

Adopted by
City Council
May XX, 2019



CITY OF DANVILLE

ANNUAL ACTION PLAN

2019-2020

Executive Summary

AP-05 Executive Summary - 24 CFR 91.200(c), 91.220(b)

1. Introduction

The purpose of this the City of Danville's Annual Action Plan for 2019-20120 is to verify the community needs and the market factors impacting the Danville community and to layout a plan for addressing those needs while outlining specific community development activities that will be carried out. This process is intended to assist in developing a viable community by providing decent housing, a suitable living environment, and expanded economic opportunities principally for the benefit of low and moderate income persons. This plan sets forth how Community Development Block Grant funds will be used to invest in the community to achieve the specific HUD objectives and outcome performance measures.

2. Summarize the objectives and outcomes identified in the Plan

This could be a restatement of items or a table listed elsewhere in the plan or a reference to another location. It may also contain any essential items from the housing and homeless needs assessment, the housing market analysis or the strategic plan.

The goals developed in the 5 year Consolidated Plan are presented in detail in SP-46 of that Plan. Specific projects to carry-out those goals are articulated in AP-15 through AP-90 of this Plan. The following summarizes the goals formulated in this Plan and the associated HUD objectives and outcomes:

Goal 1: Economic Development

Objective: Create Economic Opportunities

Outcome: Availability/Accessibility

Goal 2: Owner Occupied Housing Rehabilitation

Objective: Provide Decent Affordable Housing

Outcome: Availability/Accessibility

Goal 3: Blight Removal

Objective: Create Suitable Living Environments

Outcome: Sustainability

Goal 4:

Public Improvements & Infrastructure

Objective: Create Suitable Living Environments

Outcome: Sustainability

Goal 5: Non-Homeless Special Needs

Objective: Provide Decent Affordable Housing

Outcome: Availability/Accessibility

Goal 6: Homelessness

Objective: Create Suitable Living Environments

Outcome: Availability/Accessibility

3. Evaluation of past performance

This is an evaluation of past performance that helped lead the grantee to choose its goals or projects.

According to the 2016 Program Year End Review Letter, HUD determined that the City of Danville has the continuing capacity to administer Consolidated Plan covered programs. The City has no outstanding findings and its expenditure level on CDBG grant funding meets the requirements of the program.

In this Annual Action Plan the City of Danville is choosing to pursue most of the same goals as previously adopted and many of the same projects as previously funded due to the successes with these programs. At the same time, the City is continuing to evaluate how best to serve the ever increasing needs of the community with diminishing resources and thus some new projects are also being proposed.

4. Summary of Citizen Participation Process and consultation process

Summary from citizen participation section of plan.

The City of Danville's citizen participation process for the development of this plan followed the City's adopted citizen participation plan. This included outreach hearings for the public and meetings designed to encourage input from a broad array of the community including public housing residents,

neighborhood associations, residents from predominately low and moderate income neighborhoods, the disabled, minorities, and non-English speaking individuals. Phone and email contacts were used to gain input from entities with specific expertise, including those specializing in housing, special needs, homelessness, and economic development. These efforts met and also exceeded the stated requirements of the citizen participation plan and provided meaningful input in establishing goals and projects for this plan.

5. Summary of public comments

This could be a brief narrative summary or reference an attached document from the Citizen Participation section of the Con Plan.

In the course of the public meetings and public hearings that were scheduled to gather citizen input on this Plan minimal feedback was received. The primary source of comments came through individual consultations with the entities listed in AP-10 of this Plan under consultation. The comments received generally noted the need for continuing to improve the quality of the existing housing stock, removing blight from the City's neighborhoods, expanding economic development opportunities, addressing homeless needs, improving property values, and addressing crime in certain areas of the City. Comments also referenced emergency and transitional housing needs, mental and physical health support.

Public Comments received during the citizen participation process can be found in AP-12 which is the Citizen Participation section of this Plan.

Past questions received during this process included inquiries on the process for reaching private citizens for the public input process, the process of updating the annual action plan, and the process and purpose for allocation of programs and funds across the varying neighborhoods and wards of the City.

Past suggestions received included that of a brochure or mailing to be sent to target households to reach citizens, and to formulate a policy manual for the application process for Economic Development funds.

The public comments received including the minutes from the public hearings are attached in the appendix of this Plan.

6. Summary of comments or views not accepted and the reasons for not accepting them

All comments and views expressed **will be** accepted in the development of this 2019 Annual Action Plan.

7. Summary

The City of Danville's 2019 Annual Action Plan has been prepared in order to assist in the development of a viable community by providing decent housing, a suitable living environment, and expanded economic opportunities principally for the benefit of low and moderate income persons. Information gathered from the public, and data provided by HUD were used to identify needs, establish goals and create activities for this Annual Action Plan.

PR-05 Lead & Responsible Agencies – 91.200(b)

1. Agency/entity responsible for preparing/administering the Consolidated Plan

Describe the agency/entity responsible for preparing the Consolidated Plan and those responsible for administration of each grant program and funding source.

| Agency Role | Name | Department/Agency |
|--------------------|-------------|--------------------------|
| CDBG Administrator | DANVILLE | Community Development |

Table 1 – Responsible Agencies

Narrative (optional)

The lead agency responsible for overseeing the development of this Annual Action Plan and administering programs covered by this Plan is the City of Danville, a municipality of the State of Illinois. The City of Danville Community Development Department is responsible for administering the Consolidated Plan and Annual Action Plan. The City of Danville is not presently a member of a Consortium utilizing HUD funds.

The primary public and private agencies that may be utilized in implementing Consolidated Plan programs include neighborhood associations, faith based organizations, other governmental entities, private contractors and non-profit service and housing providers.

Consolidated Plan Public Contact Information

For more information about this City of Danville Annual Action Plan please contact R. David Schnelle, Director of Community Development, City of Danville, 1155 E Voorhees Street, Danville, IL 61832. Mr. Schnelle can also be reached via phone (217) 431-2384 or via email at dschnelle@cityofdanville.org

AP-10 Consultation – 91.100, 91.200(b), 91.215(I)

1. Introduction

The City of Danville had previously adopted a citizen participation plan that identified when public hearings and other consultations are to take place in the Annual Action Plan development process. That plan was used in preparing this 2019 Annual Action Plan. The City's Annual Action Plan was prepared to comply with all the consultation requirements of the CDBG program.

Provide a concise summary of the jurisdiction's activities to enhance coordination between public and assisted housing providers and private and governmental health, mental health and service agencies (91.215(I))

The City of Danville historically has a good working relationship with the Danville Housing Authority and both entities continually strengthen that relationship for the best interests of the community. The City is actively working with the Danville Housing Authority and other assisted housing providers in the community to improve the quality of the housing supply in the City. City staff are meeting and conversing regularly with DHA staff to work toward common goals and develop consensus on the direction of public housing in the community. City staff spoke with the Danville Housing Authority director and other DHA staff while developing this Plan in order to identify the needs, existing housing conditions, and the ongoing programs and activities of the Housing Authority.

Other assisted housing providers that the City regularly coordinates with include Habitat for Humanity of Danville and East Central Illinois Community Action Agency. City staff regularly communicates with these organizations boards and are always willing to partner for grants. Coordination between the City and other private and governmental health, mental health and service agencies is accomplished through the local Continuum of Care.

Describe coordination with the Continuum of Care and efforts to address the needs of homeless persons (particularly chronically homeless individuals and families, families with children, veterans, and unaccompanied youth) and persons at risk of homelessness.

The City is committed to continued coordination and cooperation with the Central Illinois Continuum of Care in order to better integrate programs and services. The City's strategy for developing a system to address homelessness and the priority needs of homeless persons and families is in alignment with the system utilized by the local continuum of care. The City assists the Continuum through data sharing, map production and volunteering for events such as soup kitchens and the annual street sweep. In addition the City allocates funds through the CDBG program to help address the needs of the homeless. Funds have been used in the past for such projects as lead abatement and security enhancements in a shelter where women and children are housed, and temperature control units in a men's shelter. The City will continue to look for ways to assist in the efforts to address the needs of homeless persons in the community.

Describe consultation with the Continuum(s) of Care that serves the jurisdiction's area in determining how to allocate ESG funds, develop performance standards for and evaluate outcomes of projects and activities assisted by ESG funds, and develop funding, policies and procedures for the operation and administration of HMIS

The City desires to further consult with the local Continuum and be more actively involved in the Continuum's development of policies, procedures and performance measures for the administration of HMIS. Unfortunately the local Consortium itself is very small in size in terms of individuals participating and organizations represented in regards to participating agencies but very large in terms of need and area of coverage and is severely lacking in the resources needed.

2. Describe Agencies, groups, organizations and others who participated in the process and describe the jurisdiction's consultations with housing, social service agencies and other entities

Table 2 – Agencies, groups, organizations who participated

| | | |
|---|--|--|
| 1 | Agency/Group/Organization | Danville Housing Authority |
| | Agency/Group/Organization Type | Housing PHA Other government - Local |
| | What section of the Plan was addressed by Consultation? | Housing Need Assessment Public Housing Needs |
| | Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination? | The DHA Director was informed via email that the city was drafting the 2019 Annual Action Plan. Regular discussions are continuously ongoing between City staff and DHA staff on the direction of public housing in the community. |
| 2 | Agency/Group/Organization | Dayspring |
| | Agency/Group/Organization Type | Housing Services - Housing Services-homeless |
| | What section of the Plan was addressed by Consultation? | Homelessness Needs - Veterans Non-Homeless Special Needs |
| | Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination? | Contacted Continuum Director to discuss specifics of local Continuum's recent efforts. Multiple local member organizations also contacted for data and info on homeless populations and needs. |
| 3 | Agency/Group/Organization | Habitat for Humanity of Danville |
| | Agency/Group/Organization Type | Housing Services - Housing Services-homeless |

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|---|--|--|
| | What section of the Plan was addressed by Consultation? | Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Strategy Anti-poverty Strategy |
| | Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination? | The Director was consulted on current efforts underway and informed of the drafting of this Annual Action Plan. |
| 4 | Agency/Group/Organization | Danville Neighborhood Leadership Council |
| | Agency/Group/Organization Type | Neighborhood Organization Neighborhood Organization |
| | What section of the Plan was addressed by Consultation? | Housing Need Assessment |
| | Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination? | Council was informed via email that the city was drafting the 2019 Annual Action Plan. Individual members are often consulted to determine specific issues in each neighborhood. |
| 5 | Agency/Group/Organization | CROSSPOINT HUMAN SERVICES |
| | Agency/Group/Organization Type | Services - Housing Services-Children Services-Elderly Persons Services-Persons with Disabilities Services-Persons with HIV/AIDS Services-Victims of Domestic Violence Services-homeless Services-Health Services-Education Service-Fair Housing Services - Victims |

| | | |
|---|--|--|
| | What section of the Plan was addressed by Consultation? | Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Homelessness Strategy Non-Homeless Special Needs |
| | Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination? | Crosspoint was consulted via email. |
| 6 | Agency/Group/Organization | Cris Senior Services |
| | Agency/Group/Organization Type | Services-Elderly Persons Services-Persons with Disabilities |
| | What section of the Plan was addressed by Consultation? | Non-Homeless Special Needs |
| | Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination? | Cris was consulted via email. |
| 7 | Agency/Group/Organization | Danville School District No. 118 |
| | Agency/Group/Organization Type | Services-Children Services-Education |
| | What section of the Plan was addressed by Consultation? | Non-Homeless Special Needs Anti-poverty Strategy |
| | Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination? | District 118 was consulted via email. |

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| 8 | Agency/Group/Organization | Danville Area Transportation Study |
| | Agency/Group/Organization Type | Regional organization Planning organization |
| | What section of the Plan was addressed by Consultation? | Market Analysis Economic Development Infrastructure |
| | Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination? | DATS staff was consulted during the drafting of this Plan and provided input. |
| 9 | Agency/Group/Organization | Regional Office of Education |
| | Agency/Group/Organization Type | Services-Children Services-Education |
| | What section of the Plan was addressed by Consultation? | Homeless Needs - Families with children Homelessness Needs - Unaccompanied youth Transportation |
| | Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination? | ROE was consulted via email. |
| 10 | Agency/Group/Organization | Vermilion Advantage |
| | Agency/Group/Organization Type | Regional organization Business and Civic Leaders Chamber of Commerce |
| | What section of the Plan was addressed by Consultation? | Market Analysis Economic Development |

| | | |
|----|--|--|
| | Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination? | Vermilion Advantage staff was consulted in person and via phone. VA expressed the workforce and economic development needs of the community. |
| 11 | Agency/Group/Organization | Vermilion County Mental Health Board |
| | Agency/Group/Organization Type | Services-Health Health Agency |
| | What section of the Plan was addressed by Consultation? | Homeless Needs - Families with children Non-Homeless Special Needs Health |
| | Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination? | The Mental Health Board was consulted via email. |
| 12 | Agency/Group/Organization | Your Family Resource Connection |
| | Agency/Group/Organization Type | Services - Housing Services-Children Services-Victims of Domestic Violence Services-homeless Services-Health Services-Education Service-Fair Housing Services - Victims |
| | What section of the Plan was addressed by Consultation? | Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Unaccompanied youth Homelessness Strategy Non-Homeless Special Needs |

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| | Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination? | YFRC staff was consulted via email. |
| 13 | Agency/Group/Organization | Danville Area Community College |
| | Agency/Group/Organization Type | Services-Education |
| | What section of the Plan was addressed by Consultation? | Anti-poverty Strategy Education |
| | Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination? | The College was informed via email. |
| 14 | Agency/Group/Organization | Human Relations Commission, City of Danville |
| | Agency/Group/Organization Type | Other government - Local Commission |
| | What section of the Plan was addressed by Consultation? | Non-Homeless Special Needs |
| | Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination? | Administrator was informed via email that the City was drafting the 2018 Annual Action Plan |
| 15 | Agency/Group/Organization | Salvation Army |
| | Agency/Group/Organization Type | Services-homeless |
| | What section of the Plan was addressed by Consultation? | Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Strategy |

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|----|--|---|
| | Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination? | Organization was informed via email that the city was drafting the 2019 Annual Action Plan. |
| 16 | Agency/Group/Organization | Small Business Development Center @ DACC |
| | Agency/Group/Organization Type | Services-Education Services-Employment Services - Business Assistance |
| | What section of the Plan was addressed by Consultation? | Market Analysis Economic Development |
| | Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination? | Organization was informed via email that the City was drafting the 2019 Annual Action Plan. |
| 17 | Agency/Group/Organization | Vermilion County Health Department |
| | Agency/Group/Organization Type | Services-Health Health Agency |
| | What section of the Plan was addressed by Consultation? | Non-Homeless Special Needs Lead-based Paint Strategy |
| | Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination? | Organization was informed via email that the City was drafting the 2019 Annual Action Plan. |

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| 18 | Agency/Group/Organization | East Central Illinois Community Action Agency |
| | Agency/Group/Organization Type | Services - Housing Services-Children Services-Health Services-Education Service-Fair Housing Services - Victims |
| | What section of the Plan was addressed by Consultation? | Housing Need Assessment Non-Homeless Special Needs |
| | Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination? | Organization was informed via email that the City was drafting the 2019 Annual Action Plan. |
| 19 | Agency/Group/Organization | DANVILLE RESCUE MISSION |
| | Agency/Group/Organization Type | Housing Services - Housing Services-homeless |
| | What section of the Plan was addressed by Consultation? | Homelessness Needs - Veterans Non-Homeless Special Needs |
| | Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination? | Director of the Mission was contacted and made aware of the 2019 Annual Action Plan process. |

Identify any Agency Types not consulted and provide rationale for not consulting

There were not any agency types listed above that exist in the community that were excluded.

Other local/regional/state/federal planning efforts considered when preparing the Plan

| Name of Plan | Lead Organization | How do the goals of your Strategic Plan overlap with the goals of each plan? |
|--|------------------------------------|--|
| Continuum of Care | Central Illinois Continuum of Care | The goals of the strategic plan have been coordinated with those of the Continuum of Care to make sure that areas of need are addressed. The Continuum's goals to address and end homelessness were previously integrated into the Strategic Plan of the 5 year Consolidated Plan. |
| City of Danville Comprehensive Plan 2025 | City of Danville | The goals of the Plan were developed in concert with those contained in the City's previously adopted Comprehensive Plan in order to address the critical issues facing the community. |
| Long Range Transportation Plan | Danville Area Transportation Plan | The goals of the Plan were developed in concert with those contained in the DATS previously adopted Long Range Transportation Plan in order to address the transportation related issues facing the community. |

Table 3 – Other local / regional / federal planning efforts

Narrative (optional)

AP-12 Participation – 91.105, 91.200(c)

1. Summary of citizen participation process/Efforts made to broaden citizen participation Summarize citizen participation process and how it impacted goal-setting

The City of Danville's citizen participation process for development of this Plan followed the City of Danville's adopted Citizen Participation Plan. This included outreach meetings for the public and meetings designed to encourage input from a broad array of the community including public housing residents, neighborhood associations, residents from predominately low and moderate income neighborhoods, the disabled, minorities, and non-English speaking individuals. Phone and email contacts were used to gain input from entities with specific expertise, including those specializing in housing, special needs, homelessness, and economic development. These efforts met and also exceeded the stated requirements of the Citizen Participation Plan and provided meaningful input in establishing goals and projects for this Plan.

The citizen participation process included three public input meetings held on April 22 and April 23 to obtain citizen input for the formulation of this Plan. A public notice for these meetings was published in the local newspaper fifteen days prior to the first meeting and the notice was also posted on the City's website and distributed to community organizations.

The City of Danville's Draft 2019 Annual Action Plan was made available for public review and comment from April 9, 2019 to April 24, 2019. Notice of this comment period and the associated public hearings was published in the local newspaper fifteen days prior to the start of this review period and also posted on the City's website. Draft copies of the 2019 Annual Action Plan were available for review during this time at the following locations:

Robert E Jones Municipal Building

Danville Public Library

Three public input meetings to provide input for the draft Plan were held on April 15 and April 16, 2019. The official public hearing to discuss the draft was held on April 23, 2019 at 6PM in the City Council chambers of Danville City Hall at 17 West Main Street, Danville, IL

Comments received during the course of these meetings and hearings is noted below.

Citizen Participation Outreach

| Sort Order | Mode of Outreach | Target of Outreach | Summary of response/attendance | Summary of comments received | Summary of comments not accepted and reasons | URL (if applicable) |
|------------|------------------|---|--------------------------------|------------------------------|--|---------------------|
| 1 | Public Meeting | Minorities Non-English Speaking - Specify other language: Spanish Persons with disabilities Non-targeted/broad community Residents of Public and Assisted Housing | | | | |

| Sort Order | Mode of Outreach | Target of Outreach | Summary of response/attendance | Summary of comments received | Summary of comments not accepted and reasons | URL (If applicable) |
|------------|------------------|---|--------------------------------|------------------------------|--|---------------------|
| 2 | Public Meeting | Minorities Non-English Speaking - Specify other language: Spanish Persons with disabilities Non-targeted/broad community Residents of Public and Assisted Housing | | | | |

| Sort Order | Mode of Outreach | Target of Outreach | Summary of response/attendance | Summary of comments received | Summary of comments not accepted and reasons | URL (If applicable) |
|------------|------------------|---|--------------------------------|------------------------------|--|---------------------|
| 3 | Public Meeting | Minorities Non-English Speaking - Specify other language: Spanish Persons with disabilities Non-targeted/broad community Residents of Public and Assisted Housing | | | | |

| Sort Order | Mode of Outreach | Target of Outreach | Summary of response/attendance | Summary of comments received | Summary of comments not accepted and reasons | URL (If applicable) |
|------------|------------------|---|--------------------------------|------------------------------|--|---------------------|
| 4 | Public Hearing | Minorities Non-English Speaking - Specify other language: Spanish Persons with disabilities Non-targeted/broad community Residents of Public and Assisted Housing | | | | |

Table 4 – Citizen Participation Outreach

Expected Resources

AP-15 Expected Resources – 91.220(c)(1,2)

Introduction

The City of Danville anticipates receiving only Community Development Block Grant funds from HUD, during this Annual Action Plan Program Year. At the time of the drafting of this Annual Action Plan the City's actual 2019-20Program Year allocation was not yet known. Any increase or decrease in funding levels to match actual allocation amounts will be applied to one specific activity. The one specific project activity that any increase or decrease relative to the estimated allocation amount herein listed will be applied to is the Public Improvements & Infrastructure project activity.

Anticipated Resources

| Program | Source of Funds | Uses of Funds | Expected Amount Available Year 1 | | | | Expected Amount Available Remainder of ConPlan \$ | Narrative Description |
|---------|------------------|--|----------------------------------|--------------------|--------------------------|-----------|---|-----------------------|
| | | | Annual Allocation: \$ | Program Income: \$ | Prior Year Resources: \$ | Total: \$ | | |
| CDBG | public - federal | Acquisition Admin and Planning Economic Development Housing Public Improvements Public Services | 955,459 | 20,000 | 1,500,000 | 975,459 | 2,475,459 | |

Table 5 - Expected Resources – Priority Table

Explain how federal funds will leverage those additional resources (private, state and local funds), including a description of how matching requirements will be satisfied

These federal funds identified above will leverage additional private, local and state resources. CDBG funds allocated to Economic Development activities will be leveraging private investment. Likewise, Public Facilities and Infrastructure activities will leverage other local funds including Motor Fuel Tax and Tax Increment Financing funds to accomplish more in the long run. Finally, the three Housing Programs all require private funds to be contributed towards those projects by the owner.

The City of Danville allocates over \$1 million of local funds annually for neighborhood revitalization and community development activities, including loan funds for emergency home repairs; loan funds for small business development; infrastructure improvements; crime prevention; blight removal and code enforcement. These funds are not being provided in connection with any other federal grants. This combined investment of private, local, and federal funds into the City of Danville's neighborhoods is comprehensive in nature in order to achieve lasting results.

Match requirements: The CDBG program has no match requirement.

If appropriate, describe publically owned land or property located within the jurisdiction that may be used to address the needs identified in the plan

The City of Danville currently owns a number of vacant lots around the community that could be utilized to facilitate the development of infill housing. Some of the lots are situated so that they could easily be combined together for more widescale redevelopment of underutilized neighborhoods. The City has recently partnered in the creation of a City/County landbank in order to decide how best to use this vacant/underutilized property and facilitate its redevelopment/reuse. The Landbank is now actively marketing the City's lots for resale and redevelopment.

Discussion

The CDBG funded activities proposed herein will include a blight removal activity. This is not noted on the CDBG use of funds section on the table above, but we understand this to be an allowable use of CDBG funds.

Annual Goals and Objectives

AP-20 Annual Goals and Objectives

Goals Summary Information

| Sort Order | Goal Name | Start Year | End Year | Category | Geographic Area | Needs Addressed | Funding | Goal Outcome Indicator |
|------------|---------------------------------------|------------|----------|---|----------------------------|--|-----------------|---|
| 1 | Economic Development | 2015 | 2019 | Non-Housing Community Development | CITY WIDE CDBG Target Area | Economic Development | CDBG: \$1,000 | Jobs created/retained: 4 Jobs Businesses assisted: 1 Businesses Assisted |
| 2 | Owner Occupied Housing Rehabilitation | 2015 | 2019 | Affordable Housing | CDBG Target Area | Affordable Housing Rehabilitation | CDBG: \$179,000 | Homeowner Housing Rehabilitated: 13 Household Housing Unit |
| 3 | Blight Removal | 2015 | 2019 | Non-Housing Community Development | CDBG Target Area | Blight Removal | CDBG: \$200,000 | Buildings Demolished: 18 Buildings |
| 4 | Public Improvements & Infrastructure | 2015 | 2019 | Non-Housing Community Development | CDBG Target Area | Public Improvements and Infrastructure | CDBG: \$420,264 | Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 200 Persons Assisted |
| 5 | Non-Homeless Special Needs | 2015 | 2019 | Affordable Housing Non-Homeless Special Needs | CDBG Target Area | Affordable Housing Rehabilitation Non-Homeless Special Needs | CDBG: \$1,000 | Homeowner Housing Rehabilitated: 2 Household Housing Unit |

| Sort Order | Goal Name | Start Year | End Year | Category | Geographic Area | Needs Addressed | Funding | Goal Outcome Indicator |
|------------|-----------------------------------|------------|----------|-----------------------------------|----------------------------------|---|--------------------|--|
| 6 | Planning / General Administration | 2015 | 2019 | Planning / General Administration | CITY WIDE | Affordable Housing Rehabilitation Public Improvements and Infrastructure Economic Development Blight Removal Non-Homeless Special Needs | CDBG: \$173,195 | Other: 1 Other |
| 7 | Homelessness | 2016 | 2019 | Homeless | CITY WIDE CDBG Target Area | Homelessness | CDBG: \$1,000 | Homeless Person Overnight Shelter: 40 Persons Assisted |

Table 6 – Goals Summary

Goal Descriptions

| | | |
|---|-------------------------|---|
| 1 | Goal Name | Economic Development |
| | Goal Description | This goal is designed to reduce Danville's unemployment rate by assisting businesses and facilitating the creation of new jobs or retention of existing jobs that otherwise would be lost. |
| 2 | Goal Name | Owner Occupied Housing Rehabilitation |
| | Goal Description | This goal is designed to facilitate the rehabilitation of owner occupied single family homes. Rehabilitation will primarily be focused on improvements to the exterior of a structure (roof, windows, siding) so as to preserve the structure and extend its longevity. |

| | | |
|---|-------------------------|--|
| 3 | Goal Name | Blight Removal |
| | Goal Description | This goal is intended to facilitate the demolition and clearance of deteriorated structures on a spot basis. This goal will serve the CDBG Target Area. |
| 4 | Goal Name | Public Improvements & Infrastructure |
| | Goal Description | This goal is to facilitate the upgrading of public improvements and infrastructure. This goal is intended to be targeted City wide |
| 5 | Goal Name | Non-Homeless Special Needs |
| | Goal Description | This goal will focus on ensuring accessible housing is available to those individuals/families with special needs. This goal is citywide but priority will be given to those households in the CDBG Target Area. |
| 6 | Goal Name | Planning / General Administration |
| | Goal Description | This goal is intended to make sure that all grant funds and their associated activities are properly planned and administered. This goal will be carried out citywide. |
| 7 | Goal Name | Homelessness |
| | Goal Description | This goal will focus on ensuring that adequate emergency shelters and transitional housing units are available within the community to provide housing for those that are homeless or at risk for becoming homeless. |

Projects

AP-35 Projects – 91.220(d)

Introduction

The projects listed here will address the high priority needs contained in the Consolidated Plan for the 2019-2020 program year.

Projects

| # | Project Name |
|---|---|
| 1 | Administration Expenses for CDBG 2018 |
| 2 | Economic Development Opportunities 2018 |
| 3 | Blight Removal 2018 |
| 4 | Accessibility Modifications 2018 |
| 5 | Neighborhood Impact Program 2018 |
| 6 | General Public Improvements & Infrastructure 2018 |
| 7 | Homelessness Building Assistance 2018 |

Table 7 - Project Information

Describe the reasons for allocation priorities and any obstacles to addressing underserved needs

The reasoning for these particular allocation priorities is that they address the high priority needs that were identified and articulated in this Plan. Funding priorities have not changed from those outlined in the 5 year Consolidated Plan Strategic Plan. There are no known obstacles in addressing underserved needs or proposed actions

AP-38 Project Summary

Project Summary Information

| | |
|--|--|
| Project Name | Administration Expenses for CDBG 2019 |
| Target Area | CITY WIDE |
| Goals Supported | Public Improvements & Infrastructure Economic Development Owner Occupied Housing Rehabilitation Blight Removal Non-Homeless Special Needs Homelessness Planning / General Administration |
| Needs Addressed | Public Improvements and Infrastructure Economic Development Affordable Housing Rehabilitation Blight Removal Non-Homeless Special Needs Brownfield Remediation Affordable Housing New Construction Public Services Homelessness Public Facilities |
| Funding | CDBG: \$173,195 |
| Description | This project is designed to make sure CDBG grant funds and their associated activities are properly planned and administered. This activity is citywide but many of the project sites will be in the CDBG Target Area. |
| Target Date | 4/30/2020 |
| Estimate the number and type of families that will benefit from the proposed activities | Planning & Administration Activities are not subject to benefit numbers. |
| Location Description | Citywide |
| Planned Activities | The planned activities are for administering the CDBG Grant and associated activities and coordinating with related programs. |

| | | |
|----------|--|---|
| 2 | Project Name | Economic Development Opportunities 2018 |
| | Target Area | CITY WIDE |
| | Goals Supported | Economic Development |
| | Needs Addressed | Economic Development |
| | Funding | CDBG: \$1,000 |
| | Description | This project is to facilitate the creation of new jobs or retention of existing jobs that otherwise would be lost in the community. |
| | Target Date | 4/30/2020 |
| | Estimate the number and type of families that will benefit from the proposed activities | 4 low-mod income families |
| | Location Description | Citywide |
| | Planned Activities | |
| 3 | Project Name | Blight Removal 2018 |
| | Target Area | CDBG Target Area |
| | Goals Supported | Blight Removal |
| | Needs Addressed | Blight Removal |
| | Funding | CDBG: \$200,000 |
| | Description | This activity is designed to provide for the demolition and disposal of deteriorated buildings that are no longer feasible for rehabilitation and reuse and which are having a blighting effect on the surrounding neighborhoods. This will be carried out on a spot basis. |
| | Target Date | 4/30/2020 |
| | Estimate the number and type of families that will benefit from the proposed activities | An estimated 18 vacant structures will be demolished. No families will directly benefit, but the benefit will accrue to the surrounding households and the surrounding neighborhoods through improved living conditions and preserved property values. |
| | Location Description | CDBG Target Area |
| | Planned Activities | This activity is to remove deteriorated blighting structures from the community. |
| 4 | Project Name | Accessibility Modifications 2019 |

| | | |
|---|--|--|
| | Target Area | CITY WIDE CDBG Target Area |
| | Goals Supported | Owner Occupied Housing Rehabilitation Non-Homeless Special Needs |
| | Needs Addressed | Affordable Housing Rehabilitation Non-Homeless Special Needs |
| | Funding | CDBG: \$1,000 |
| | Description | Modify or renovate existing structures by providing accessibility, mobility and sensory disability improvements to property occupied by low-moderate income persons and/or property serving low-moderate income populations. |
| | Target Date | 4/30/2020 |
| | Estimate the number and type of families that will benefit from the proposed activities | 1 low-moderate income families |
| | Location Description | Citywide, with preference given to locations within the CDBG Target Area. |
| | Planned Activities | Modifications to the interior and/or exterior of structures to provide accessibility, mobility, and sensory disability improvements. |
| 5 | Project Name | Neighborhood Impact Program 2019 |
| | Target Area | CITY WIDE CDBG Target Area |
| | Goals Supported | Owner Occupied Housing Rehabilitation |
| | Needs Addressed | Affordable Housing Rehabilitation |
| | Funding | CDBG: \$179,000 |
| | Description | This activity will allow for funds to provide needed exterior envelope repairs to homes of low income households that are owner occupied on a citywide basis with preference given to households in the CDBG Target Area. |
| | Target Date | 4/30/2020 |
| | Estimate the number and type of families that will benefit from the proposed activities | 13 low-moderate income families |

| | | |
|----------|--|---|
| | Location Description | Citywide, with preference given to households in the CDBG Target Area. |
| | Planned Activities | Roof and other exterior envelope improvements to at least 13 low-moderate income owner occupied houses in the City. |
| 6 | Project Name | General Public Improvements & Infrastructure 2019 |
| | Target Area | CDBG Target Area |
| | Goals Supported | Public Improvements & Infrastructure |
| | Needs Addressed | Public Improvements and Infrastructure |
| | Funding | CDBG: \$420,264 |
| | Description | This activity will allow for select public infrastructure improvements to be made in the community with a priority given to stormwater and sidewalk projects. |
| | Target Date | 4/30/2020 |
| | Estimate the number and type of families that will benefit from the proposed activities | This will be an area benefit to the area where the public infrastructure improvements are made with the area predominately comprised of low-moderate income residents. It is estimated that there would be at least 200 low-moderate income families in the area that would directly or indirectly benefit. |
| | Location Description | CDBG Target Area |
| | Planned Activities | This activity will allow for select public infrastructure improvements to be made in an eligible area of the community. Exact location and type of improvements will be determined at a later date. |

| | | |
|----------|--|---|
| 7 | Project Name | Homelessness Building Assistance 2019 |
| | Target Area | CDBG Target Area |
| | Goals Supported | Non-Homeless Special Needs Homelessness |
| | Needs Addressed | Non-Homeless Special Needs Homelessness |
| | Funding | CDBG: \$1,000 |
| | Description | This activity will allow for building assistance to be provided for emergency shelters and transitional housing units in order for those facilities to remain available in the community. |
| | Target Date | 4/30/2020 |
| | Estimate the number and type of families that will benefit from the proposed activities | 40 homeless individuals or families |
| | Location Description | CDBG Target Area |
| | Planned Activities | This activity will allow for building improvements to be made to existing emergency shelters and transitional housing units in order for those facilities to remain available in the community. |

AP-50 Geographic Distribution – 91.220(f)

Description of the geographic areas of the entitlement (including areas of low-income and minority concentration) where assistance will be directed

The CDBG Target Area encompasses the geographic area of the City of Danville that is South of Voorhees Street and includes the Downtown and the City's oldest neighborhoods in and around the Downtown core. This area is also where the majority of the area's households have incomes of less than 80% of the Area Median Income. Voorhees Street is a prominent East/West dividing line thru the City that basically divides the City in half geographically with areas to the South being older and in need of comprehensive revitalization and areas to the North being newer and in better overall condition. The CDBG target area is predominately comprised of low-moderate income households and this target area is also comprised of a much higher concentration of minorities than the balance of the City.

Geographic Distribution

| Target Area | Percentage of Funds |
|--------------------|----------------------------|
| CITY WIDE | 100 |
| CDBG Target Area | 90 |

Table 8 - Geographic Distribution

Rationale for the priorities for allocating investments geographically

The basis for giving priority to the allocation of investments geographically to the CDBG Target Area is to ensure that the scarce resources that are available are used in the areas where there is the most need and where they can have a measurable impact on the overall area.

Discussion

Affordable Housing

AP-55 Affordable Housing – 91.220(g)

Introduction

The plan for affordable housing in the 2019-20120 plan year is to concentrate on housing rehabilitation for eligible lower income households. No rental assistance, production of new units or acquisition of existing units will be funded through this Plan in this program year.

| One Year Goals for the Number of Households to be Supported | |
|---|----|
| Homeless | 40 |
| Non-Homeless | 13 |
| Special-Needs | 2 |
| Total | 55 |

Table 9 - One Year Goals for Affordable Housing by Support Requirement

| One Year Goals for the Number of Households Supported Through | |
|---|----|
| Rental Assistance | 0 |
| The Production of New Units | 0 |
| Rehab of Existing Units | 55 |
| Acquisition of Existing Units | 0 |
| Total | 55 |

Table 10 - One Year Goals for Affordable Housing by Support Type

Discussion

The units identified above include: owner occupied housing repairs through Neighborhood Impact Program (13); and accessibility modifications to households with "special needs" (2); and building improvements at existing homeless shelters/facilities (40 beds).

AP-60 Public Housing – 91.220(h)

Introduction

There are no specific projects from the grant funds covered in this plan assigned to be used solely to meet the needs of public housing residents. The City of Danville is actively working with the Danville Housing Authority on plans for improving the quality of affordable housing in the community including that of public housing.

Actions planned during the next year to address the needs to public housing

The City of Danville plans to continue to work with DHA to develop a plan that identifies tangible and quantitative actions that will support the needs of the residents and community.

Actions to encourage public housing residents to become more involved in management and participate in homeownership

The DHA has worked diligently to establish resident councils within its developments in order to increase resident involvement and gather input from current residents. DHA has been exploring offering the Section 8 Housing Choice Voucher Home Ownership Program in order to facilitate residents transition into homeownership.

If the PHA is designated as troubled, describe the manner in which financial assistance will be provided or other assistance

Not applicable.

Discussion

AP-65 Homeless and Other Special Needs Activities – 91.220(i)

Introduction

The City is proposing to continue to fund an accessibility modifications program in order to assist those special needs individuals with a demonstrated need with safe decent affordable housing and public access. The City is also actively involved in the local Continuum of Care and encourages the use of the HMIS as a data collection tool for service delivery and funding prioritization. The City is attempting to expand outreach by encouraging partnerships with other service agencies and faith-based organizations not currently involved with the Local Continuum of Care.

Describe the jurisdictions one-year goals and actions for reducing and ending homelessness including reaching out to homeless persons (especially unsheltered persons) and assessing their individual needs

The City of Danville will continue to work with the local Continuum of Care, including the individual organizations that comprise the local Continuum, in order to better understand and assess the individual needs of homeless persons in the jurisdiction. This will include continued participation in the local Continuum of Care Point in Time Count and Street Sweep in order to best assess the extent of homelessness and needs of homeless individuals in our community.

Addressing the emergency shelter and transitional housing needs of homeless persons

The City will continue to support the needs of the emergency shelters and transitional housing already established in the community. This will be accomplished by preserving the condition of and safe livability of all available units in the two primary emergency shelters as proposed herein and by participating in the expansion of transitional housing opportunities as those arise. Recently a new shelter facility has been proposed in the community and the City is actively working to ensure the success of this new facility.

Helping homeless persons (especially chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth) make the transition to permanent housing and independent living, including shortening the period of time that individuals and families experience homelessness, facilitating access for homeless individuals and families to affordable housing units, and preventing individuals and families who were recently homeless from becoming homeless again

The City will continue to provide assistance to meet the needs of emergency shelters and transitional housing in the community. In addition, the City has recently supported the development of a new transitional housing development in the community (Dayspring) which was recently completed. This facility expands the homeless housing options by providing permanent supportive housing for homeless females and their families.

Helping low-income individuals and families avoid becoming homeless, especially extremely low-income individuals and families and those who are: being discharged from publicly funded institutions and systems of care (such as health care facilities, mental health facilities,

foster care and other youth facilities, and corrections programs and institutions); or, receiving assistance from public or private agencies that address housing, health, social services, employment, education, or youth needs.

The City will assist individuals and families in avoiding homelessness through the CDBG funded Neighborhood Impact Program which is designed to make necessary repairs to keep structures occupied by low income owners habitable. The City also has a separate Housing Loan Program which is designed to provide low interest loans which are targeted directly at correcting conditions that would render the homes of extremely low income persons uninhabitable. The demand for these programs far outweighs the resources so when City resources are not available we will make sure that the individuals and families with unmet needs are connected to the other resources in the community where some assistance could be sought including the Salvation Army, East Central Illinois Community Action Agency and others.

Discussion

AP-75 Barriers to affordable housing – 91.220(j)

Introduction:

High tax rates, land use controls and building codes can all have a negative effect on affordable housing and residential investment. The City of Danville has no taxing policies that are not found in other communities that would directly impact the development of affordable housing or residential investment in a negative manner. Housing related taxes are based solely on the assessed value of a property. The City does have a rental registration program which requires that all rental dwelling units be registered with the City on annual basis with a nominal fee required in order to offset the costs of that program. Land use controls include adopted zoning, subdivision and building codes. The City's development codes do include some elements that could end up increasing development costs in the older established neighborhoods of the City. The City has taken steps in recent years to reduce this burden and encourage reinvestment by eliminating the need to obtain permits and pay fees for certain common home maintenance improvements as well as providing incentives to encourage infill housing development in the City's older neighborhoods. Thus, the housing development and other new private investment that does take place in the community's older established neighborhoods is frequently obtaining incentives and subsidies to facilitate the development. Building code requirements and fees are the same for all types of residential developments and present no barriers to affordable housing or residential development. Land costs in the City are also very reasonable and available vacant land is plentiful.

Actions it planned to remove or ameliorate the negative effects of public policies that serve as barriers to affordable housing such as land use controls, tax policies affecting land, zoning ordinances, building codes, fees and charges, growth limitations, and policies affecting the return on residential investment

The City codes in place can increase the cost of building and rehabilitating affordable housing in the older neighborhoods of the City of Danville. These additional costs can be offset by incentives that the City is able to make available to assist with building and rehabilitation projects. In fact, the City has several incentive programs in place to facilitate the development of in-fill housing within the City's established neighborhoods. These include providing lots at little or no cost, waiving permit fees, and providing on site infrastructure assistance. These programs are increasingly being taken advantage of in recent years, particularly by Habitat for Humanity and other community organizations, for new affordable in-fill housing construction.

As the population has declined the City of Danville has historically failed to enact measures to preserve urban density by offering incentives and relocation to the most prone residential neighborhoods. The City is developing a neighborhood wellness plan in order to analyze the current situations in each neighborhood and identify the activities that need to be carried out in each neighborhood in order to revitalize and stabilize the individual neighborhoods that are the building blocks of the community.

AP-85 Other Actions – 91.220(k)

Introduction:

The section addresses the City of Danville's planned actions to foster and maintain quality affordable housing, encourage safe homes free of lead based paint and other hazards for low-mod income individuals, reduce the number of households in poverty through various services and programs, promote the coordination of services among the various providers, and seek and support the pursuit of additional funding to address underserved needs.

Actions planned to address obstacles to meeting underserved needs

Obstacles identified include insufficient funding to meet the documented needs, the need for better coordination of services, and the widespread quality issue with the existing housing stock. In order to resolve these issues the City of Danville will apply for funding and support other applications that will finance programs that address underserved needs and encourage full participation in the coordination of services of all applicable local agencies. The City will work to strengthen housing codes and incorporate internal housing inspections into the current codes so that more units are meeting HUD safe housing standards. Due in part to lax regulations in the past some landlords have allowed their properties to fall into disrepair thru lack of maintenance and reinvestment which has created unsafe living situations for tenants.

Actions planned to foster and maintain affordable housing

There is an overabundance of housing units in the City of Danville and the housing stock is very affordable. The primary problems stem from the advanced age and ever worsening conditions of the housing stock. The City will foster and maintain affordable housing through the housing rehabilitation programs which will allow the City to facilitate an improvement in the quality of the affordable housing stock. The City also supports, both financially and otherwise, in any way it can private efforts to reinvest into the existing housing stock as such opportunities arise.

Actions planned to reduce lead-based paint hazards

The City will continue to ensure that all housing programs and projects comply with lead paint regulations through the following actions.

The City will continue to employ at least 1 individual who is an Illinois licensed Lead Risk Assessor. All residents of units or units within buildings being considered for assisted or grant funded rehabilitation will be presented lead hazard information pamphlets and provided the opportunity to discuss or ask questions concerning lead based paint with a risk assessor as pursuant to 40 CFR Part 745 and 24 CFR Part 35. Next, any persons less than six years of age who reside in or frequent any unit within a building considered for rehabilitation is found to have a blood lead level at or above 10µg/dL, the Vermilion County Health Department will be advised, and measures pursuant to Illinois Administrative Code, Ch. I, §845.26, shall be enacted.

The City owns an x-ray fluorescence analyzer and has established an account with EMSL Analytical, Inc. for processing of test samples. For all housing projects undertaken, the presumption of lead being present will be made and the contractors selected to complete the projects will be required to take all

appropriate measures in compliance with lead regulations in the performance of demolition and construction activities. Testing will be conducted where requested.

Actions planned to reduce the number of poverty-level families

The goal set in the previously adopted strategic plan (SP-65 of 2015-19 Consolidated Plan) would be to reduce the number of families in poverty (families with an annual income of less than 30% of Area Median Income) by providing assistance to at least 20 families annually. This will be accomplished by: utilizing HUD CDBG funds for targeted housing rehabilitation to keep those in poverty in their homes; improvements to emergency shelter/transitional housing facilities in order to provide a means for those most in need to transition into better conditions; and to assist in job creation that will benefit families in poverty or near poverty. These programs will assist extremely low income families to find suitable housing or remain in their homes without using their limited funds for repairs and also provide job opportunities to prevent low income families from dropping into poverty or assist in moving families out of poverty.

Actions planned to develop institutional structure

The local institutional structure is in decent shape but the continued cuts in state and local funding are impacting the ability of some local organizations to effectively carryout their missions and provide the necessary programs and resources to all who need them. The primary gap in the existing institutional structure is a need to further enhance coordination among the various service agencies and this is proving to be difficult to improve upon given the current financial climate within the State of Illinois. The City is working to take the lead in promoting additional coordination with these entities where practical. Coordination and collaboration efforts will be spearheaded by additional involvement with the Local Continuum of Care, and consultations with existing service agencies not already engaged in this process or with the Continuum.

Actions planned to enhance coordination between public and private housing and social service agencies

Ongoing collaboration with the Danville Housing Authority, Habitat for Humanity, East Central Illinois Community Action Agency, Crosspoint Human Services, local property managers and landlords, and the other engaged community organizations will continue to be spearheaded by the City. Through the Housing Task Force efforts the City has attempted to enhance coordination with all of the housing stakeholders in the community to ensure they are all working towards common goals as established in this Plan and in the Housing Task Force Report. This will ensure that all other housing efforts in the community in the future, including those of the Danville Housing Authority, Habitat for Humanity, and private developers, are better coordinated with the City's adopted plans and codes.

Discussion:

As part of the City of Danville's ongoing efforts to address the housing and neighborhood revitalization needs of the community the City has been and will continue exploring additional/alternative funding sources. The City has recently completed several planning efforts and adopted plans to facilitate the redevelopment of several areas of the community including the East Main Street corridor, Danville High School Campus neighborhood, Bowman Avenue Corridor, and the Downtown Riverfront area. Other grant opportunities are also being explored to further these redevelopment and revitalization efforts and to implement those plans.

Program Specific Requirements

AP-90 Program Specific Requirements – 91.220(I)(1,2,4)

Introduction:

The City expects to use 70% of its CDBG grant funds for Low-Mod Activities. The Overall Benefit criteria will be met over the 2 year period commencing May 1, 2018 and ending April 30, 2020.

Community Development Block Grant Program (CDBG)

Reference 24 CFR 91.220(I)(1)

Projects planned with all CDBG funds expected to be available during the year are identified in the Projects Table. The following identifies program income that is available for use that is included in projects to be carried out.

| | |
|--|----------|
| 1. The total amount of program income that will have been received before the start of the next program year and that has not yet been reprogrammed | 0 |
| 2. The amount of proceeds from section 108 loan guarantees that will be used during the year to address the priority needs and specific objectives identified in the grantee's strategic plan. | 0 |
| 3. The amount of surplus funds from urban renewal settlements | 0 |
| 4. The amount of any grant funds returned to the line of credit for which the planned use has not been included in a prior statement or plan | 0 |
| 5. The amount of income from float-funded activities | 0 |
| Total Program Income: | 0 |

Other CDBG Requirements

| | |
|---|--------|
| 1. The amount of urgent need activities | 0 |
| 2. The estimated percentage of CDBG funds that will be used for activities that benefit persons of low and moderate income. Overall Benefit - A consecutive period of one, two or three years may be used to determine that a minimum overall benefit of 70% of CDBG funds is used to benefit persons of low and moderate income. Specify the years covered that include this Annual Action Plan. | 70.00% |