

DRAFT

ANNUAL ACTION PLAN 2022-2023

CITY OF WHITE PLAINS, NEW YORK

DEPARTMENT OF PLANNING
COMMUNITY DEVELOPMENT PROGRAM

EXECUTIVE SUMMARY

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

Introduction

The United States Department of Housing and Urban Development (HUD) administers the Community Development Block Grant (CDBG) Program. The program, authorized under Title I of the 1974 Housing and Community Development Act, provides annual grants to communities to complete a wide range of projects aimed at revitalizing neighborhoods, fostering economic development and improving community facilities and services. Projects and activities that benefit low- and moderate-income persons are funding priorities. Funding levels are based on the entitlement community's population, percentage of low- and moderate-income residents and age of housing. The City of White Plains has been a designated entitlement community since the program's inception. The program allows entitlement communities to develop their own projects and funding priorities in accordance with the following national objectives:

- Benefit to low- and moderate-income persons;
- Aid in the prevention or elimination of slums or blight conditions; or
- Address other community development needs that present a serious and immediate threat to the health and welfare of the community

CDBG activities must also meet HUD's eligibility requirements and address a priority need identified in the Consolidated Plan; the City's current plan is active from July 1, 2020 until June 30, 2025. The five-year Consolidated Plan is submitted to HUD as part of the application to receive these funds. The Consolidated Plan utilizes a data-based Needs Assessment and Housing Market Analysis combined with a substantial community consultation process to identify the City's most pressing community development needs.

These findings inform a Strategic Plan that establishes goals and strategies designed to meet those needs over the next five years. An Annual Action Plan is then developed to identify the use of funds on an annual basis for each year of the Consolidated Plan.

This Annual Action Plan is active from July 1, 2022 to June 30, 2023, this is the third Annual Action Plan of the 2020-24 Consolidated Plan. This plan identifies community needs to be addressed, describes the projects and activities to be undertaken and the planned geographic distribution of CDBG funds in FY 2022-23. This Plan meets the consolidated submission requirements outlined in 24 CFR part 91; as such, the proposed projects and activities are consistent with the stated goals, objectives and funding priorities of the Consolidated Plan.

As part of each program year, the Community Development Program, in partnership with the Community Development Citizen Advisory Committee (CDCAC), offers a grant program for local public services. This program releases necessary funds to public service agencies serving White Plains low- and moderate-income neighborhoods or agencies providing direct benefit to qualified individuals and families in need.

Additionally, the Community Development Program offers funding for historic preservation and rehabilitation of special facilities that serve the community. Applications for funding are accepted on a rolling basis throughout the program year.

CDBG funded programs and activities are located throughout the City and its neighborhoods and are available to all White Plains residents protected under the County, State and Federal Laws. Statistics on program beneficiaries are collected throughout the program year and are available for each project, activity and the grant as a whole. These figures are reported in the City's Consolidated Annual Performance and Evaluation Report (CAPER) published each September.

Summarize the Objectives and Outcomes Identified in the Plan

The findings of the Needs Assessment conducted as a part of the 2020-24 Consolidated Plan show that White Plains residents are cost burdened regardless of household income or tenure. Naturally, the most vulnerable populations are the elderly and households earning between 0-30% Area Median Income (AMI). High housing costs make it very challenging for lower income households to maintain a residence. These households often cannot achieve self-sufficiency given their earning potential and limited supply of affordable housing options. Issues with substance abuse or improperly treated mental health conditions can exacerbate housing instability and can lead to unsafe housing conditions and/or homelessness.

Since the Needs Assessment was conducted, the City of White Plains was affected by the COVID-19 pandemic. The impacts of the coronavirus have only exacerbated the needs of the City's most vulnerable populations and has made new groups vulnerable.

Evaluation of Past Performance

The Planning Department is committed to optimizing the administration of CDBG funds each program year. The Department fosters strategic partnerships in a variety of ways to address the City's priority needs. Over the past 48 years, the City of White Plains Community Development Program has achieved the following:

- Over 3,000 housing units have been rehabilitated, representing \$8 million in investments in the City's housing stock
- Over \$9 million has been allocated towards public service programs serving White Plains residents in a variety of ways
- Over \$9.5 million has been allocated towards City infrastructure projects such as parks, community facilities and neighborhood public works

Projects identified for the 2022-23 program year were selected based on an evaluation of past successes and lessons learned. A Consolidated Annual Performance and Evaluation Report (CAPER) is created at the end of each fiscal year and provides an evaluation of past performance for that year.

Summary of Citizen Participation Process and Consultation Process

The 2022-23 Annual Action Plan citizen participation and consultation process was conducted in accordance with the procedures laid out in the Citizen Participation Plan. Consultation and participation efforts included internal meetings with the City's Department of Public Works, Recreation and Parks, Planning and Youth Bureau, the Community Development Citizens Advisory Committee (CDCAC) were also consulted. A Notice of Funding Availability was published with a full plan development schedule, two pre-application workshops for the Public Service Grant Program and two public hearings. In December 2021, the Community Development Program launched the @CD_WhitePlains Instagram account. The account has been instrumental in publicizing the program's offerings and connecting with new subsets of the public.

The initial Public Hearing was held virtually on January 27, 2022; 20 public service agencies presented their request for funding through the Public Service Grant Program to the CDCAC. The CDCAC will host a second public hearing on April 7, 2022. This hearing will be held approximately three weeks into the Draft Plan's 30-day public comment period, allowing the public ample time to review the document. Comments received from the hearings will be recorded in the meeting minutes, which will be published in the final plan Appendix.

The City encourages all White Plains residents, especially low- and moderate-income persons, minorities, non-English speakers, and residents of Target Areas to attend public hearings, provide comments and express individual views and ideas regarding community development and housing needs. Following the hearings, the CDCAC will meet to determine public service funding recommendations for the 2022-23 program year.

Summary of Public Comments

The Draft 2022-23 Annual Action Plan was released on March 14, 2022 and will be available for public review and comment until April 14, 2022. All comments received will be accepted and incorporated into the final plan as appropriate.

Summary of Comments or Views Not Accepted and the Reasons for Not Accepting Them

All comments regarding the 2022-23 Annual Action Plan will be accepted and incorporated into the plan where applicable.

Summary

The 2022-23 Annual Action Plan describes the City's proposed use of \$950,000 in new CDBG funds for FY 2022-23. Additional funds from the Rehabilitation Revolving Loan Fund will finance Housing Rehabilitation activities.

The primary objective of the CDBG Program is the development of viable urban communities by providing decent housing, a suitable living environment and expanding economic opportunities, principally for persons of low- and moderate-income. A minimum of 70% of the overall CDBG award will benefit White Plains low- and moderate-income* households.

The 2022-23 Annual Action Plan allocates funding to the following projects in the amounts listed using anticipated funding levels:

Administration	\$ 184,000
Code Enforcement	\$ 85,000
Housing Rehabilitation	\$ 220,000
Public Facilities	\$ 150,000
Public Services	\$ 251,000
Economic Development	\$ 60,000

*ANNUAL INCOME AS DEFINED FOR PURPOSES OF REPORTING UNDER INTERNAL REVENUE SERVICE (IRS) FORM 1040 SERIES FOR INDIVIDUAL FEDERAL ANNUAL INCOME TAX PURPOSES.

LEAD & RESPONSIBLE AGENCY

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

Agency/entity responsible for preparing/administering the Consolidated Plan

The following are the agencies/entities responsible for preparing the Consolidated Plan and administration of each grant program and funding source.

Lead Agency <i>City of White Plains Department of Planning</i>
CDBG Administrator <i>City of White Plains Department of Planning</i>

Narrative

The City of White Plains Common Council declared the Department of Planning as Lead Agency through a resolution passed on July 1, 2019. As Lead Agency, the Department of Planning is responsible for the preparation of the 2020-24 Consolidated Plan and all other CD-related plans and reports, as required by the U.S. Department of Housing and Urban Development (HUD). In addition, the Department is responsible for the administration of all types of CDBG funds. CD Program staff work closely with the Community Development Citizen Advisory Committee (CDCAC) in the development of these plans and reports.

The Planning Department, in conjunction with the CDCAC, has served as Lead Agency for the development of the Consolidated Plan since HUD instituted the requirement in 1994. The Department has successfully prepared and administered six Consolidated Plans for the City of White Plains to date - 1995, 2000, 2015, 2010, 2015 and 2020.

This Annual Action Plan is active from July 1, 2022 to June 30, 2023 and is the third Annual Action Plan of the 2020-24 Consolidated Plan. The Draft Annual Action Plan was released to the public on March 14, 2022 for a thirty-day public comment period, which will conclude on April 14, 2022. A second public hearing will be held on April 7, 2022, providing the public with an additional opportunity to participate in the development of the plan. Any additional views or comments of the public will be incorporated into the final document where applicable. The Final 2022-23 Annual Action Plan will be released and submitted to the Common Council for their approval at the May 2, 2022 meeting. If the plan is to the satisfaction of the Council, it will be forwarded to HUD for final review and approval.

Consolidated Plan Public Contact Information

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CONSULTATION

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

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(l))

Comprehensive coordination between service providers and government agencies is a critical component of the Community Development Program. Such coordination enables all service providers to understand the availability of other programs. Coordination also allows the Community Development Program to understand how different program service areas are linked and how they share many of the same consumers. Program staff engages in regular and active communication with various entities to maintain and enhance coordination between and among service providers and government agencies.

A shared concern among the leadership of community organizations continues to be the impacts of COVID-19 on vulnerable populations and the challenges that the pandemic created.

To better publicize CD resources the program initiated the @CD_WhitePlains handle on Instagram. This has helped the program advertise economic development activities and increase participation.

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 of White Plains is a member of the Westchester County Continuum of Care (CoC) Partnership for the Homeless. The core planning participants in the CoC are Westchester County and the cities of Yonkers, Mt. Vernon, White Plains and New Rochelle. To maximize the impact of limited funding Westchester CoC municipal members with smaller pro-rata funding combine their funds to provide better homeless services. White Plains coordinates placement of chronically homeless individuals through participation at monthly steering committee meetings. Community Development Program staff regularly attends these meetings in order to stay up-to-date on outreach efforts and provide general support for CoC activities. The City of White Plains works closely with Lifting Up Westchester to meet the needs of the homeless population and those experiencing food insecurity as a result of the coronavirus.

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

An Emergency Solutions Grant (ESG) is not active within White Plains.

DESCRIBE AGENCIES, GROUPS, ORGANIZATIONS AND OTHERS WHO PARTICIPATED IN THE PROCESS AND DESCRIBE THE JURISDICTIONS CONSULTATIONS WITH HOUSING, SOCIAL SERVICE AGENCIES AND OTHER ENTITIES

1. White Plains Housing Authority (WPHA)

Agency/Group/Organization Type

PHA

What section of the Plan was addressed by the Consultation?

Public Housing Needs

How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?

CD Staff participate in the White Plains Community Resources Conference to gain insight on the challenges and resources available to WPHA residents. WPHA was consulted for the responses provided in AP-60. WPHA also provides data for the development of the Consolidated Annual Performance and Evaluation Report published each September.

2. Westchester Residential Opportunities, Inc.

Agency/Group/Organization Type

Services - Housing; Services - Fair Housing

What section of the Plan was addressed by the Consultation?

Housing Needs Assessment

How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?

WRO provides regular updates and insights on housing needs in White Plains. The Planning Department also refers residents with housing related challenges to WRO.

3. City of White Plains - Department of Building

Agency/Group/Organization Type

Other government - Local

What section of the Plan was addressed by the Consultation?

Housing Needs Assessment; Market Analysis

How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?

The Department of Building works closely with the Department of Planning on a variety of housing related topics. Building Department staff work closely with the Neighborhood Conditions Coordinator on the Safe Housing Task Force and the Tenant Displacement Fund for individuals and families that have been displaced due to code violations or other unsafe conditions. CD Staff and Code Enforcement Officers canvass neighborhoods and communicate with homeowners, tenants and the

general public concerning code requirements; and preserve safe housing and neighborhood conditions.

4. Lifting Up Westchester

Agency/Group/Organization Type

Services - Homeless

What section of the Plan was addressed by the Consultation?

Homelessness Strategy

How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?

The organization also represents the City on the County's CoC Board and provides data to the Community Development Program regarding homelessness on a regular basis. The CD Program intends to continue its close partnership with LUW and the two homeless shelters that they operate within White Plains.

5. City of White Plains - Department of Recreation and Parks

Agency/Group/Organization Type

Other government - Local

What section of the Plan was addressed by the Consultation?

Non-Homeless Special Needs

How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?

The Department of Recreation and Parks worked closely with CD staff to identify public facility and infrastructure projects that would advance the goals of the Community Development Program. The Program also provides financial support of Recreation and Parks programs through the Public Service Grant Program.

6. Thomas H. Slater Center

Agency/Group/Organization Type

Other - Community Center

What section of the Plan was addressed by the Consultation?

Non-Homeless Special Needs

How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?

The Community Development Program intends to continue its financial support of the Slater Center through the Public Service Grant Program.

7. El Centro Hispano

Agency/Group/Organization Type

Civic Leaders; Other - Community Center

What section of the Plan was addressed by the Consultation?

Housing Needs Assessment; Non-Homeless Special Needs

How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?

The Community Development Program intends to continue its financial support of El Centro through the Public Service Grant Program. El Centro, on behalf of the residents they serve requested CDBG funds to be used for ESL courses, obtaining High School Equivalency (HSE) diplomas, as well as job and vocational training.

8. City of White Plains Youth Bureau

Agency/Group/Organization Type

Other government - Local

What section of the Plan was addressed by the Consultation?

Non-Homeless Special Needs

How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?

The Youth Bureau operates within the City's public schools and has contact with youth citywide. The Community Development Program intends to continue its financial support of Youth Bureau programs through the Public Service Grant Program.

9. City of White Plains - Department of Public Works

Agency/Group/Organization Type

Other government - Local

What section of the Plan was addressed by the Consultation?

Non-Homeless Special Needs

How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?

The Department of Public Works coordinates with CD staff to identify public facility and infrastructure projects that would advance the goals of the Community Development Program.

10. City of White Plains Department of Planning**Agency/Group/Organization Type**

Other government - Local

What section of the Plan was addressed by the Consultation?

Housing Needs Assessment; Homelessness Strategy

How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?

The Department of Planning is consulted on a regular basis throughout the entire plan development process. Specifically, information collected by the Neighborhood Conditions Coordinator was used in determining funding priorities for this year. The Planning Department is also responsible for maintaining a database of current and projected affordable housing.

11. White Plains BID**Agency/Group/Organization Type**

Business Leaders

What section of the Plan was addressed by the Consultation?

Economic Development

How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?

The White Plains BID assisted the City in exploration of expanding the CDBG Economic Development Program. Provides information regarding current membership and available programs to CD Staff.

12. Westchester Community College - Workforce Development**Agency/Group/Organization Type**

Education

What section of the Plan was addressed by the Consultation?

Non-Homeless Special Needs

How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?

Westchester Community College Workforce Development assisted staff in identifying in-demand industries and job training programs that would meet the needs identified in the Consolidated Plan.

13. Southern Westchester Boards of Cooperative Educational Services (BOCES)**Agency/Group/Organization Type**

Education

What section of the Plan was addressed by the Consultation?

Non-Homeless Special Needs
<i>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</i>
Southern Westchester BOCES assisted staff in identifying in-demand industries and job training programs that would meet the needs identified in the Consolidated Plan.
14. Loola Doola Boutique
<i>Agency/Group/Organization Type</i>
Business Leaders
<i>What section of the Plan was addressed by the Consultation?</i>
Economic Development
<i>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</i>
The owner and operator of Loola Doola Boutique provided insights on the current retail climate in White Plains, including needs and challenges to doing business downtown. The Boutique was also able to broaden CD Staff's connections with the wider White Plains business community.
15. National Community Development Association (NCDA)
<i>Agency/Group/Organization Type</i>
Other - Community Development Advocacy Group
<i>What section of the Plan was addressed by the Consultation?</i>
Other - Award Projections
<i>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</i>

Table 1 – Agencies, Groups, Organizations who Participated

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

All organizations listed above actively participated in some aspect of the consultation process. Any organization or agency not included was not intentionally omitted or did not chose to participate.

OTHER LOCAL/REGIONAL/STATE/FEDERAL PLANNING EFFORTS CONSIDERED WHEN PREPARING THE PLAN

1. Westchester County - Housing Needs Assessment
<i>Lead Organization</i>
Westchester County Department of Planning
<i>How do the goals of your Strategic Plan overlap with the goal of each plan?</i>
The Westchester County Housing Needs Assessment identifies housing affordability as one of the County's most critical needs as is reflected in the "Out of Reach" analysis conducted as a part of the Housing Needs Assessment. These needs are reflected in the Code Enforcement and Housing Retention and Stabilization goals of the Strategic Plan.
2. Continuum of Care Guiding Principles (August 15, 2018)
<i>Lead Organization</i>
Westchester County Continuum of Care Partnership for the Homeless
<i>How do the goals of your Strategic Plan overlap with the goal of each plan?</i>
The guiding principles of the CoC is to "coordinate all of the stakeholders, systems and resources available to prevent and end homelessness in Westchester County". The 10-year vision of the CoC is to ensure that no one will remain homeless for more than 30 days before being restored to appropriate housing. The CoC served as a valuable resource for the development of the Consolidated Plan and their goals, strategies and recommendations were incorporated throughout the plan, most notable in the Housing Retention and Stabilization goal of the Strategic Plan.
3. Mid-Hudson Region Strategic Plan (2017)
<i>Lead Organization</i>
Regional Economic Development Council (REDC)
<i>How do the goals of your Strategic Plan overlap with the goal of each plan?</i>
The Region's Plan identifies 15 goals to realize the vision of the Mid-Hudson Region. One of these goals is focused on housing development, specifically housing for seniors and the development of affordable or workforce housing. The Consolidated Plan recognizes the need for additional housing resources, especially for our most vulnerable populations. The Code Enforcement and Housing Retention and Stabilization goals of the Strategic Plan reflect these needs.
4. One White Plains, City of White Plains Comprehensive Plan (ongoing)
<i>Lead Organization</i>
City of White Plains Planning Department
<i>How do the goals of your Strategic Plan overlap with the goal of each plan?</i>

One White Plains is the City of White Plains ongoing comprehensive planning effort. Substantial community engagement kicked off the first phase of the project. CD Staff were able to participate in “Listening Sessions” hosted at locations and events throughout the City. CD Staff anticipate to receive consistent feedback until the plan is finalized, which is anticipated for 2023.

Table 2 – Other Local / Regional / Federal Planning Efforts

CITIZEN PARTICIPATION

AP-12 Participation - 91.105, 91.200(c)

Summary of citizen participation process/Efforts made to broaden citizen participation

In response to the feedback received during the 2020-24 Consolidated Plan planning process; the CD Program rolled out the @CD_WhitePlains Instagram account. This account allows the Program to connect with residents and stakeholders and to publicize programs and available resources. This has boosted engagement in the program's activities and broadened awareness of available programs. Participation took place virtually to avoid unnecessary transmission of the coronavirus.

Summarize citizen participation process and how it impacted goal-setting

In accordance with the City's Citizen Participation Plan, the Notice of Funding Availability included anticipated funding levels for the CDBG programs and program calendar including opportunities for public participation.

The Community Development Citizens Advisory Committee heard requests for funding from 20 public service agencies. Each agency described their program's needs and challenges providing unique insights on the needs of the community. Agencies stated that food insecurity remains elevated, although it has decreased since the onset of the pandemic, needs for youth programs, education programs, and expansion or transition of existing programs. Program staff notes that requests for funding were higher this year than in year's past.

EXPECTED RESOURCES

AP-15 Expected Resources

Introduction

The City of White Plains developed the Draft 2022-23 Annual Action Plan based on an anticipated CDBG award of \$950,000.

To maximize the impact of CDBG funds, the City expends general government funds, actively seeks and secures other State of private grant and resources, and encourages all sub-grantees to leverage additional resources from outside of the CDBG program.

Anticipated Resources

CDBG (Community Development Block Grant) Program			
<i>Source</i>	Public - Federal	<i>Allocation</i>	\$950,000
<i>Use</i>	Program Administration	<i>Program Income</i>	\$0
	Code Enforcement	<i>Prior Year Resources</i>	\$0
	Public Facilities		
Public Services	<i>Total</i>	\$950,000	
Home Rehabilitation	<i>Expected Amount Remainder of Con Plan</i>		\$1,966,911
Economic Development			

Table 3 - Expected Resources

The Draft 2022-23 Annual Action Plan allocates funding to the following projects, in the amounts listed:

- Planning and Administration: \$184,000
- Housing Rehabilitation: \$220,000
- Code Enforcement: \$85,000
- Public Facilities: \$150,000
- Public Services: \$251,000
- Economic Development: \$60,000

Public Service agencies that meet the priorities stated in the 2020-24 Consolidated Plan, meet the criteria identified in the Pre-Application Instructions, participated at the January 27, 2022 Public Hearing, and received a recommendation for funding from the CDCAC will receive CDBG awards, in the case that the City’s overall award amount is sufficient.

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

Federal funds used to support public services leverage funds from the private sector as well as state, county and local resources. Applicants are required to disclose committed or pending program funding

as part of their application which is used to evaluate applications. All programs administered by City of White Plains agencies, such as the Youth Bureau's After School Program, are also supported by the City's general fund. Federally funded code enforcement is supported in part by City dollars as well as funding from New York State. The Home Rehabilitation Program also uses funds from NYS Affordable Housing Corporation to offset the cost of rehab often passed on to homeowners. The CD Program often applies for County, State and Federal awards that may advance the goals and requirements for the Community Development Program.

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

There are no projects anticipated at this time.

ANNUAL GOALS & OBJECTIVES

AP-20 Annual Goals and Objectives

Goals Summary Information

1 Program Administration	
<i>Category</i>	Program Administration
<i>Objective</i>	Create suitable living environments
<i>Geographic Area</i>	All CD Target Areas and Citywide low-/mod-
<i>Need(s) Addressed</i>	Planning and Administration
<i>Funding</i>	\$184,000
<i>Outcome</i>	Sustainability
<i>GOI</i>	Other: 1 Other
2 Housing Rehabilitation	
<i>Category</i>	Quality Affordable Housing
<i>Objective</i>	Create suitable living environments
<i>Geographic Area</i>	All CD Target Areas and Citywide low-/mod-
<i>Need(s) Addressed</i>	Quality Affordable Housing
<i>Funding</i>	\$220,000
<i>Outcome</i>	Sustainability
<i>GOI</i>	Homeowner Housing Rehabilitated: 8 Household Housing Units
3 Code Enforcement	
<i>Category</i>	Quality Affordable Housing
<i>Objective</i>	Create suitable living environments
<i>Geographic Area</i>	Code Enforcement Target Areas
<i>Need(s) Addressed</i>	Quality Affordable Housing
<i>Funding</i>	\$85,000
<i>Outcome</i>	Sustainability
<i>GOI</i>	Housing Code Enforcement: 125 Household Housing Units

4 Public Facilities	
<i>Category</i>	Non-housing Community Development
<i>Objective</i>	Create suitable living environment
<i>Geographic Area</i>	All CD Target Areas and Citywide low-/mod-
<i>Need(s) Addressed</i>	Public Facilities
<i>Funding</i>	\$150,000
<i>Outcome</i>	Sustainability
<i>GOI</i>	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 1,800 Persons Assisted
5 Public Services	
<i>Category</i>	Non-housing Community Development; Non-housing Special Needs; Homeless
<i>Objective</i>	Create suitable living environment
<i>Geographic Area</i>	All CD Target Areas and Citywide low-/mod-
<i>Need(s) Addressed</i>	Housing Retention and Stabilization; Support Vulnerable Populations; Community Building
<i>Funding</i>	\$251,000
<i>Outcome</i>	Sustainability
<i>GOI</i>	Public Services other than Low/Moderate Income Housing Benefit: 2,000 Persons Assisted
6 Economic Development	
<i>Category</i>	Non-housing Community Development
<i>Objective</i>	Create suitable living environment
<i>Geographic Area</i>	All CD Target Areas
<i>Need(s) Addressed</i>	Community Building
<i>Funding</i>	\$60,000
<i>Outcome</i>	Sustainability
<i>GOI</i>	Businesses Assisted: 5 Businesses Assisted

Table 4 - Goals Summary

PROJECTS

AP-35 Project - 91.220(d)

Introduction

The CD Program intended to fund the following projects in FY 2022-23, if funding levels are sufficient. The selected projects address priority needs and goals identified in the 2020-24 Consolidated Plan, as amended April 21, 2021.

Projects

CDBG Projects					
Program Admin	Home Rehabilitation	Code Enforcement	Public Facilities	Public Services	Economic Development

(1) PROGRAM ADMINISTRATION

<i>Target Area</i>	2020-2024 All CD Target Areas 2020-2024 City-wide - low/mod
<i>Goals Supported</i>	Planning and Administration
<i>Needs Addressed</i>	Planning and Administration
<i>Funding</i>	\$184,000
<i>Description</i>	Administration activities of the Community Development Block Grant program.
<i>Target Date</i>	6/30/2023
<i>Estimate the number and type of families that will benefit from the proposed activities</i>	All residents, either directly or indirectly impacted by CDBG-funded programs and activities
<i>Location Description</i>	N/A
<i>Planned Activities</i>	Deliver the CDBG projects and activities and meet the administrative requirements of the programs

(2) HOME REHABILITATION

<i>Target Area</i>	2020-2024 All CD Target Areas 2020-2024 City-wide low/mod
<i>Goals Supported</i>	Housing Rehabilitation
<i>Needs Addressed</i>	Quality Affordable Housing
<i>Funding</i>	\$220,000
<i>Description</i>	Financial assistance for qualified households for eligible repairs
<i>Target Date</i>	6/30/2023
<i>Estimate the number and type of families that will benefit from the proposed activities</i>	Program Staff will assess at least 8 properties that will ultimately benefit from financial assistance provided through the housing rehabilitation fund and/or the Home Safety Initiative, which provides smoke and carbon monoxide detectors to eligible households
<i>Location Description</i>	At eligible residences throughout the City.
<i>Planned Activities</i>	<u>Home Rehabilitation Program</u> : Oversight of rehabilitation projects, preparation of specifications and bids, work site monitoring visits, filing of mortgages and deferred liens. <u>Home Safety Initiative</u> : Provide smoke and carbon monoxide detectors to eligible households

(3) CODE ENFORCEMENT

<i>Target Area</i>	2020-30 Code Enforcement Areas (see Appendix)
<i>Goals Supported</i>	Code Enforcement
<i>Needs Addressed</i>	Quality Affordable Housing
<i>Funding</i>	\$85,000
<i>Description</i>	See project activities
<i>Target Date</i>	6/30/2023
<i>Estimate the number and type of families that will benefit from the proposed activities</i>	All residents of Code Enforcement Target Areas benefit from improved code compliance.
<i>Location Description</i>	Code Enforcement Target Areas
<i>Planned Activities</i>	Increase the number of residences complying with local codes to improve housing conditions and the built environment that positively affect property values and overall neighborhood character. Enforcement activities take place in areas where housing is deteriorated or deteriorating and where there are signs of overcrowding or other illegal occupation. Activities also include night canvassing, inspection of properties on the Rental Housing Registry and emergency response. When challenging cases arise, residents will be connected with the Neighborhood Conditions Coordinator. Code enforcement activities are intentionally designed to avoid adversely impacting already burdened households and communities.

(4) PUBLIC FACILITIES

<i>Target Area</i>	2020-2024 All CD Target Areas 2020-2024 City-wide - low/mod
<i>Goals Supported</i>	Public Facilities
<i>Needs Addressed</i>	Public Facilities
<i>Funding</i>	\$150,000
<i>Description</i>	Improvements to local parks serving CD target areas and community facilities providing critical services to low-/moderate-income households, the homeless and special needs populations. Historic preservation of culturally significant local landmarks.
<i>Target Date</i>	6/30/2023
<i>Estimate the number and type of families that will benefit from the proposed activities</i>	All households who are located within the project's service area
<i>Location Description</i>	Specific community or public facilities located in or serving the population of CD target areas
<i>Planned Activities</i>	Investment is necessary for community and public facilities. Capital is needed for acquisition costs, improvements to streets, sidewalks and public infrastructure, removal of architectural barriers and emergency response

(5) PUBLIC SERVICES

<i>Target Area</i>	2020-2024 All CD Target Areas 2020-2024 City-wide - low/mod
<i>Goals Supported</i>	Public Services
<i>Needs Addressed</i>	Community Building; Vulnerable Populations; Housing Retention and Stabilization
<i>Funding</i>	\$251,000
<i>Description</i>	Provide necessary funding to local public service providers who serve White Plains low- and moderate-income residents. Selected services represent a new or quantifiable increase in levels of service and are not duplicative within White Plains.
<i>Target Date</i>	6/30/2023
<i>Estimate the number and type of families that will benefit from the proposed activities</i>	Beneficiaries of the funded public service providers.
<i>Location Description</i>	At various locations throughout White Plains.
<i>Planned Activities</i>	Support programs that provide housing retention and stabilization, support vulnerable populations or assist in the development of the community or provide comprehensive community services, or job or vocational training

(6) ECONOMIC DEVELOPMENT

<i>Target Area</i>	2020-2024 City-wide - low/mod
<i>Goals Supported</i>	Economic Development
<i>Needs Addressed</i>	Community Building
<i>Funding</i>	\$60,000
<i>Description</i>	Provide necessary funding to White Plains businesses in need.
<i>Target Date</i>	6/30/2023
<i>Estimate the number and type of families that will benefit from the proposed activities</i>	All White Plains residents benefit from a vibrant local business community.
<i>Location Description</i>	Select businesses in White Plains
<i>Planned Activities</i>	Provide necessary funding to White Plains businesses in need; and assist in the development of the overall White Plains business community.

Table 5 - Project Information

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

These projects were selected as priorities for the 2022-23 program year because they address the priority needs, strategies and goals identified in the 2020-2024 Consolidated Plan, as amended April 2021. The City of White Plains is a small grantee, traditionally receiving an annual entitlement grant of less than \$1,000,000. This level of funding is not enough to meet critical community needs such as supplying additional affordable housing. The impacts of the COVID-19 pandemic have exacerbated the needs of the City's most vulnerable populations and has made new groups vulnerable. It is likely underserved needs will continue to outpace funding availability.

GEOGRAPHIC DISTRIBUTION

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

SP-10 of the 2020-24 Consolidated Plan, as amended April 2021, provides a detailed description of the geographic areas in which funds will be directed.

Geographic Distribution

Target Area	Funds Allocated (%)
Barker	11%
Battle Hill	11%
Carhart South	11%
Downtown South	13%
Eastview	12%
Ferris-Church	10%
Fisher Hill	11%
Highlands	11%
Kensico-Lake	10%
Citywide Low-/Mod-	70%
Code Enforcement Areas	10%

Table 6 - Geographic Distribution

Rationale for the priorities for allocating investments geographically

Investments will be allocated partially on a geographic basis through CD designated Target Areas. Target Areas were determined based on the concentration of low-/moderate-income residents in each Census Tract Block Group or are based on presumed low-/moderate-income benefit (i.e. homeless). These priorities were determined by the needs identified in the Consolidated Plan.

AFFORDABLE HOUSING

AP-55 Affordable Housing - 91.220(g)

Introduction

The City of White Plains utilizes local, state and federal programs to support affordable housing. The following figures reflect the number of housing units supported with some form of subsidy or are expected to within the program year.

<i>One-Year Goals for the Number of Households to be Supported</i>	
<i>Homeless</i>	211
<i>Non-Homeless</i>	5,022
<i>Special-Needs</i>	402
<i>Total</i>	5,635

Table 7 - One-year Goals for Affordable Housing by Support Requirement

<i>One-Year Goals for the Number of Households Supported Through</i>	
<i>Rental Assistance</i>	5,321
<i>The Production of New Units</i>	295
<i>Rehab of Existing Units</i>	8
<i>Acquisition of Existing Units</i>	0
<i>Total</i>	5,635

Table 8 - One-year Goals for Affordable Housing by Support Type

Discussion

In addition to governmental and non-profit housing programs, the City has an Affordable Rental Housing Program (ARHP) that requires affordable housing units in new multi-family projects. The ARHP requires developers to designate between 8% and 12% of the units in new or renovated buildings for households with 50% to 100% of the Area Median Income. The ARHP regulations allow developers to buy out of part of their obligation through payment of a substantial fee in lieu of providing units within the development. The fee is deposited into the Affordable Housing Assistance Fund, which has been used to fund and support low and very low-income housing. On an annual basis, the ARHP produces more new affordable housing units than any other housing program currently active in the City. The CD Program also collaborates with Lifting Up Westchester to provide a wide variety of supportive services to the homeless, from drop-in sheltering to placement in independent living quarters.

PUBLIC HOUSING

AP-60 Public housing

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

The White Plains Housing Authority (WPHA) is currently undergoing redevelopment for Winbrook Apartments to Brookfield Commons. The project is in phase two of the five-phase redevelopment and is expected to begin housing residents at the start of this program year.

Phase II includes 129 residential units, 75 parking spaces and approximately 2,000 square feet of community facility space. The new building will contain 40 one-bedroom units, 63 two-bedroom units, 23 three-bedroom units, two four-bedroom units and one unit designated for the superintendent. Rents will be affordable to households whose income falls between 30% and 87% AMI for Westchester County, as adjusted annually. Redevelopment of Winbrook Apartments will not displace any current residents, as affordable units are set-aside for existing residents.

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

It is HUD's policy to encourage resident management. HUD encourages HAs, resident councils and resident management corporations to explore the various functions involved in management to identify appropriate opportunities for contracting with a resident management corporation. Potential benefits of resident-managed entities include improved quality of life, experiencing the dignity of meaningful work, enabling residents to choose where they want to live, and meaningful participation in the management of the housing development.

In an effort to encourage residents to become more involved with the property's management and to participate in homeownership, WPHA has:

- Recruited residents to participate in public art and other beautification efforts;
- Distributed flyers regarding resources that assist with financial planning and homeownership assistance;
- Encouraged residents to take advantage of job training opportunities;
- Offered job placement for qualified residents to attain jobs in constructing buildings as part of the redevelopment of Brookfield Commons; and
- Participated in weekly stakeholder meetings, encouraging residents to become involved in meaningful engagement with management and prepare for homeownership.

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

The White Plains Housing Authority is not designated as troubled.

HOMELESS & OTHER SPECIAL NEEDS ACTIVITIES

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

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

White Plains coordinates with the Westchester County Continuum of Care (CoC) in its efforts to reach out to unsheltered homeless individuals. Specifically, White Plains collaborates with Lifting Up Westchester (LUW) and Westhab to provide homeless services to families and individuals in the City.

Those in need of homeless services begin with Westchester County's Department of Social Services (DSS) local office and are then assigned to the appropriate shelter. Shelters offer a wide-range of supportive services including providing clothing, essential supplies, nutritious meals, case management, referrals to medical and mental health providers, and assistance with finding safe, affordable housing as well as vocational training and employment opportunities.

Certain individuals do not wish to participate in DSS's process or otherwise fail to comply with, or meet, shelter eligibility requirements. These individuals are directed to LUW's overnight drop-in shelter for a safe place to sleep, eat a hot meal and shower.

LUW's Homeless Outreach Team goes out into the community (often with representatives from the Department of Public Safety) to build relationships with unsheltered individuals, ensure their safety and ultimately, to persuade them to accept shelter. The January 2021 Point in Time (PIT) count, conducted during the height of the pandemic, identified 25 individuals who were unsheltered in White Plains. This represented a 64% increase from the previous year's count. CD Program staff and LUW anticipated the increase in unsheltered individuals due to the impacts of the pandemic.

Addressing the emergency shelter and transitional housing needs of homeless persons

Lifting Up Westchester operates two shelters, specialized for single men and women and Westhab operates a shelter for families. Shelters are located in downtown White Plains. Additionally, the YWCA operates a transitional shelter for women recently released from incarceration or in-patient mental health or substance abuse treatment.

All homeless persons within White Plains are eligible for shelter through the coordinated entry process described in the response above. Shelter staff provide housing and employment services to shelter "drop-ins" and encourage compliance with DSS requirements to receive support that is more intensive.

DSS places homeless families with children in the Coachman Family Shelter or in emergency apartments. Westhab's Coachman Shelter houses half of Westchester County's homeless

families and 17% of the County's homeless individuals at Lifting Up Westchester's shelters. White Plains' homeless service providers were able to provide safe shelter to families and individuals despite the challenges presented by the COVID-19 pandemic.

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

2022 marks the beginning of the fourth year Lifting Up Westchester (LUW) has been operating under their Restoring Independence Program. LUW launched this program to reduce the amount of time individuals spend in the shelter system and improve outcomes for those exiting the system. Dedicated case managers focus on:

HOUSING SEARCH AND RETENTION

Setting a personal budget, finding suitable housing and navigating applications, leasing and move-in. Clients are assigned a dedicated Housing Retention Case Manager for 6 to 12 months to help address any obstacles that may jeopardize their housing. 140 individuals have been housed since the program's inception and only one remains unhoused.

LIFE SKILLS/VOCATIONAL TRAINING

Connecting clients with workshops and training to learn financial management, housekeeping, nutrition and health information, conflict resolution, build job readiness skills and obtain other critical life skills coaching.

EMPLOYMENT SEARCH AND RETENTION

Identifying work skills, areas of interest and obstacles to employment. Case managers assist in preparing resumes, completing applications, practicing through mock interviews and interfacing with employers on behalf of clients. Once clients are employed, they are assigned a dedicated Employment Retention Case Manager for 6 to 12 months to help navigate any obstacles in maintaining employment. Over the past two years, over 100 individuals have been placed in employment and 86% of those are still employed.

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 CD Program takes a multi-faceted approach to preventing low- and extremely low-income households from becoming homeless. Through the Public Service Grant Program, the City offers rental and mortgage relief to families, legal representation and eviction proceedings as well as scholarships

for many types of youth programming to connect families with safe childcare options after school and throughout the summer. Many of the subsidized youth programming provides students with tactile learning opportunities exposing them to high-earning careers. These youth programs help students achieve their highest potential, despite the conditions they may experience at home.

To respond to the COVID-19 pandemic, the City has also prioritized funding for programs that meet food insecurities or provide housing retention or stabilization services. These programs include emergency food pantries, grocery distributions and assistance to survivors of domestic violence.

CD Staff participates in the CoC's monthly Eviction Prevention committee meeting. The committee has streamlined the emergency eviction prevention application, established a housing helpline and continues to advocate for legal representation of tenants involved in eviction proceedings. Additionally, the City's Neighborhood Conditions Coordinator assists residents dealing with difficult housing situations to prevent homelessness.

BARRIERS TO AFFORDABLE HOUSING

AP-75 Barriers to Affordable Housing - 91.220(j)

Introduction

The Department of Planning updated the Analysis of Impediments to Fair Housing Choice (AI) in 2020. The AI evaluates the impacts of public policies, land use patterns, transportation routes and housing discrimination that together create impediments to fair housing choice at the local level. The AI includes the following impediments and strategies:

- Cost of Housing
- Knowledge of Fair Housing Laws
- Discrimination
- Age of Housing Stock
- Zoning, Public Services and Improvements

Information on actions planned for the upcoming program year is provided below. The plan is available for review in the City's Planning Department and is available online on the City's website, at: cityofwhiteplains.com/PlansReports

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

CD Staff routinely review procedures to optimize program delivery and identify opportunities for improvement. As part of the 2020-24 Consolidated Plan, code enforcement procedures were reviewed and modified. An analysis was conducted on the block group level to determine where Code Enforcement activities were most necessary. Census data such median age of housing, median housing value, median household income, rate of poverty and concentration of low- to moderate-income households were combined with the results of the most recent neighborhood conditions survey and review of code violations relating to overcrowding or life safety issues to determine Code Enforcement Target Areas for the next 10 years. CDBG also funds home rehabilitation and public facility improvements in these areas to support code enforcement activities. Additionally, the City's Neighborhood Conditions Coordinator ensures equitable enforcement of these codes. The coordinator's involvement in code enforcement has proven to be effective in assisting families displaced by unsafe housing conditions.

Home Rehabilitation Guidelines were also reviewed as part of the 2020-24 Consolidated Plan. These guidelines were modified to allow for soft costs and new types of housing units to be eligible for publicly assisted home rehabilitation. These changes greatly increase the number of units eligible for assistance and reduce financial burden placed on the owner.

OTHER ACTIONS

AP-85 Other Actions

The City of White Plains Department of Planning and Community Development Program provides a wide range of programs that address community needs, many of which fill in gaps from State and Federal programs. Despite the Program's best attempt, certain obstacles hinder the Program's ability to meet underserved needs in the community. The community consultation process conducted as part of the development of the 2020-24 Consolidated Plan identified the following public service needs:

- Provide eviction prevention, housing counseling services, provide outreach and general support to homeless persons and assist formerly homeless households during the transition to permanent housing
- Serve vulnerable populations such as: at-risk youth, elderly, food insecure households and individuals with special needs
- Assist in the development of the community or provide comprehensive community services

Actions planned to address obstacles to meeting underserved needs

CD Staff will focus on identifying and addressing any gaps left by State and Federal programs, as it is likely underserved needs will be at an all-time high as the affects of the COVID-19 pandemic are still present. This Annual Action Plan meets community needs to the extent CDBG program requirements and funding levels allow.

CDBG-funded public services are selected based on their ability to leverage federal funds, meet an unmet need and overall benefit to the community, especially to those that earn a low- to moderate-income. CD staff will continue to maximize available community resources and services to the greatest extent possible.

Actions planned to foster and maintain affordable housing

The City's most effective method of creating and maintaining affordable housing units is through the locally adopted Affordable Rental Housing Program (ARHP). In 2019, updated rules and procedures were adopted to reflect affordable housing needs. There are currently 201 affordable housing units under construction in White Plains and 262 units approved for development. Units are made available to households earning between 50% and 110% AMI for Westchester County, as adjusted annually by HUD. It is anticipated that units approved under these improve guidelines will come online during this program year.

The Department also administers the Senior Citizen Rent Increase Exemption (SCRIE) and Disability Rent Increase Exemption (DRIE) Programs. The programs freeze rent at their current level and exempt the participant from future rent increases. Certain senior or disabled households are eligible for this assistance. The Department also maintains information on Fair Housing, local HUD-certified Housing Counseling Agencies and other housing resources on the City's website.

Actions planned to reduce lead-based paint hazards

A New York State law enacted on April 6, 1993 requires that all children from six months to six years be tested for lead-based paint poisoning as part of their physical examinations. Instances of lead exposure are determined by elevated levels of lead in the blood; this is indicated by 10 micrograms or higher per deciliter. The Westchester County Department of Health and the White Plains Community

Development Program established a cooperative program in 1993. Westchester County is notified of children whose blood screenings show these elevated lead levels, extensive abatement procedures in the home are then taken to prevent further lead exposure.

The County Health Department is also a recipient of the Lead Poisoning Prevention Program grant, funding door-to-door outreach within high-risk zip codes. White Plains zip code 10606 is a "community of concern" due to high instances of elevated blood levels in children under the age of six. In 2005, 4.2% of children who resided in 10606 and underwent a blood level screening showed elevated levels of lead in their blood. In 2014, the number of new instances has decreased to 0.32%.

The City continues to work in close collaboration with the Westchester County Community Health Services and the Department of Health, Planning and Evaluation, the department responsible for blood screenings and for the inspection of the dwelling units.

The Community Development Program continues to offer low-interest loans and technical assistance to eligible owners to remove lead-based paint hazards through the Home Rehabilitation program. The Community Development Program provides all applicants for housing rehabilitation assistance with complete information regarding lead-based paint hazards in compliance with all HUD requirements. Eligible work to remove hazards includes replacement windows, aluminum capping of all trim, interior sheet rocking of walls, encapsulation and replacement of cabinets, related moldings and trim.

Actions planned to reduce the number of poverty-level families

At the time of writing 2020 Census data has not been made available. According to the data provided by the 2019 American Community Survey (5-year estimates), 12.3% of individuals and 8.2% of families, fall below the Federal Poverty Line. For families in poverty, 19% were single female-headed households. Of those households, 5.3% had children under 5 years of age living in the household and 13.5% had children under the age of 18 living in the household. All of these metrics have increased from 2018 to 2019.

The CD Program prioritizes funding for public services that serve vulnerable individuals and programs that provide housing retention or stabilization services. Further, a detailed description of the City's Anti-Poverty Strategy is provided in SP-70 in the 2020-2024 Consolidated Plan.

Actions planned to develop institutional structure

The City's Department of Planning and Community Development Program works closely with all levels of government, developers, businesses and public service agencies. In response to the COVID-19 pandemic, the Department of Planning has been regularly gathering service providers to identify underserved needs, as they relate to food security and housing stability. The Planning Department intends to maintain these open lines of communication throughout the program year.

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

The City participates in a work group that involves local hospitals, religious organizations, the White Plains Public Housing Authority, the companies that manage WPHA units and other public service agencies to enhance communication among stakeholders. Regular participation at these meetings will continue throughout the program year.

PROGRAM SPECIFIC REQUIREMENTS

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

Community Development Block Grant Program (CDBG) Reference 24 CFR 91.220(I)(1)

The following table identifies the CD Program's program income. Funds are received when rehabilitation loans are repaid. Any funds left over from prior year resources are also provided.

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	70%

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.

Table 9 - CDBG