

**CITY OF HOLLAND**  
**COMMUNITY DEVELOPMENT BLOCK GRANT**  
**2019 ANNUAL ACTION PLAN – AMENDMENT 3 - Draft**

**Executive Summary**

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

**1. Introduction**

The City of Holland is entering its 36th year in the Community Development Block Grant Program.

As a participant in the Community Development Block Grant Program the Department of Housing and Urban Development requires the submission of a Five-Year Consolidated Plan Master Plan. Our current Consolidated Plan runs from 2015 to 2019. In this plan, the City acts as the lead agency and identifies available resources and specific actions to be taken to address community needs and priorities over the five-year period. In addition to the Master Plan, the city must develop an Annual Action Plan to cover each of the five years of the Master Plan. The Annual Action Plan provides information regarding the City's grants administration, approach to resource allocation, and specific project descriptions and funding levels for each activity selected to receive CDBG Funding. The Plan also discusses strategies for addressing community development, housing, homelessness, and poverty issues in the City. In general, the Annual Action Plan explains activities to be carried-out during the course of one year.

AMENDMENT 1: This amendment eliminates one proposed program, Rental Rehabilitation, due to an absence of demonstrated need and due to administrative barriers that have been assessed disproportionate to potential benefit.

AMENDMENT 2: This amendment incorporates required information pertaining to the City's planned use of the CDBG-CV Round 1 supplemental allocation.

AMENDMENT 3: This amendment incorporates required information pertaining to the City's planned use of the CDBG-CV Round 2 supplemental allocation.

**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.

While there are multiple initiatives by the City of Holland that work to ensure we remain a vibrant community, the activities selected for Community Development Block Grant funding for the upcoming year focus on providing assistance to:

- provide public services for youth employment;
- improve housing and neighborhood conditions;
- make housing more affordable and accessible;
- provide fair housing services, and,
- ensure effective management of the CDBG Program.

As further explained within this document, all activities are measured in terms of outputs and specific indicators of results. Reference to these outcomes is made throughout the Plan.

### **3. Evaluation of past performance**

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

Concerning the City's past performance in the CDBG Program, HUD requires the annual submission of the Consolidated Annual Performance and Evaluation Report (CAPER) for the City's fiscal year. The most recent completed Fiscal Year for the City of Holland ended on June 30, 2019. We have not identified affordable housing development programs so previous years monies have not been spent.

### **4. Summary of Citizen Participation Process and consultation process**

Summary from citizen participation section of plan.

Annual Action Plan Process-The Neighborhood Improvement Committee (NIC) is the City of Holland appointed citizen participation group that is responsible to oversee the CDBG program. The NIC consulted the community during a Community Consultation meeting on February 19, 2019 to obtain public input regarding community needs from residents, area agencies and city departments. The public was notified of this meeting via the City Website as well as the local daily newspaper. In addition, the public was given an opportunity to review and provide comment on the proposed plan during a 30 day comment period prior to the July 17, 2019 public hearing and adoption of the plan. Notice of the public hearing and comment period were made via the City Website as well and the local daily newspaper, The Holland Sentinel.

AMENDMENT 1: This amended version was available for public review and comment from May 4, 2020 to June 3, 2020. A public notice was published in the Holland Sentinel on April 18, 2020. A public hearing was held on June 3, 2020. No public comment was received during the review period, including at the public hearing.

AMENDMENT 2: The City made use of the HUD-allowed waiver allowing for an expedited public comment and review period. The waiver was requested via an email sent on May 20, 2020. A Public Notice was published in the Holland Sentinel on 5/23/20. The public comment period began on May 26 and ended on June 2, 2020. A public hearing occurred on June 3, 2020. No public comment was received during the review period, including at the public hearing.

AMENDMENT 3: (to be added upon completion of public comment period and public hearing)

## **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.

Comments provided during the Consultation Meeting during the public hearing are listed in the Consultation Meeting and Public Hearing Minutes.

Affordable housing was the predominant concern expressed at the consultation meeting. This Annual Action plan begins to address the need for new affordable units in the City of Holland.

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

No comments were rejected. Residents at all meetings and hearings were welcome and encouraged to make whatever comments they wanted.

## **7. Summary**

This Annual Action Plan was developed in collaboration with the Neighborhood Improvement Committee, with an opportunity for the public to review the plan and provide input on two occasions.

**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 | HOLLAND | Community & Neighborhood Services |

**Table 1 – Responsible Agencies**

**Narrative (optional)**

The City of Holland is an entitlement community with over 30 years of experience managing a Community Development Block Grant program.

**Consolidated Plan Public Contact Information**

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

### **1. Introduction**

The Annual Action Plan was developed in consultation with residents, housing providers, and other agencies. This year we will continue to address affordable housing activities through our Home Repair and Home Energy Retrofit Programs. New activities added this year will be Youth Employment (Public Services), Affordable Housing Development, and Sidewalk Replacements (Public Facilities).

#### **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))**

As a member of the Lakeshore Housing Alliance we participate with local housing providers, and other public service agencies to coordinate services around housing through the Continuum of Care. The City of Holland, as a member of the Macatawa Area Coordinating Council, works collaboratively in providing government services across the Holland/Zeeland metro area.

#### **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 a voting member of the Lakeshore Housing Alliance. The Lakeshore Housing Alliance provides inter-agency Continuum of Care coordination for our community. This agency was mentioned in the Consolidated plan and is an excellent example of coordination between public and private housing agencies.

#### **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**

As a member of the Allocation and Accountability sub-committee of the Lakeshore Housing Alliance, our staff member helps determine the allocation of Emergency Shelter Grants. We review proposals as a group of non-funded agencies and make funding recommendations.

### **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 | <b>Agency/Group/Organization</b>   | LAKESHORE HABITAT FOR HUMANITY  |
|   | <b>Agency/Group/Organization Type</b>  | Housing   |
|   | <b>What section of the Plan was addressed by Consultation?</b>   | Housing Need Assessment<br>Anti-poverty Strategy  |
|   | <b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b> | We have regular contact with Habitat's Executive Director to coordinate our Annual Action Plan with their activities in the City of Holland.  |
| 2 | <b>Agency/Group/Organization</b>   | Lakeshore Housing Alliance/United Way   |
|   | <b>Agency/Group/Organization Type</b>  | Housing   |
|   | <b>What section of the Plan was addressed by Consultation?</b>   | Housing Need Assessment<br>Homeless Needs - Chronically homeless<br>Homeless Needs - Families with children<br>Homelessness Needs - Veterans<br>Homelessness Needs - Unaccompanied youth<br>Homelessness Strategy |
|   | <b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b> | An LHA representative attended the community consultation meeting and also serves on the Neighborhood Improvement Committee.  |
| 4 | <b>Agency/Group/Organization</b>   | Fair Housing Center of West Michigan  |
|   | <b>Agency/Group/Organization Type</b>  | Service-Fair Housing  |
|   | <b>What section of the Plan was addressed by Consultation?</b>   | Housing Need Assessment   |

|   |  |  |
|---|--|--|
|   | <b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b> | The Fair Housing Center of Western Michigan attended our community consultation meeting. They continue to provide excellent Fair Housing Services for Holland residents. We coordinate regularly with them on education, training and fair housing complaints and testing. |
| 5 | <b>Agency/Group/Organization</b>   | Ottagan Addictions Recovery  |
|   | <b>Agency/Group/Organization Type</b>  | Services-Health  |
|   | <b>What section of the Plan was addressed by Consultation?</b>   | Substance Abuse  |
|   | <b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b> | The agency sent a representative to our community consultation meeting.  |
| 6 | <b>Agency/Group/Organization</b>   | Holland Museum   |
|   | <b>Agency/Group/Organization Type</b>  | Services-Children<br>Other government - Local  |
|   | <b>What section of the Plan was addressed by Consultation?</b>   | Civic Use  |
|   | <b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b> | The agency sent a representative to our community consultation meeting.  |
| 7 | <b>Agency/Group/Organization</b>   | Ottawa County Mental Health  |
|   | <b>Agency/Group/Organization Type</b>  | Services-Health<br>Other government - County   |
|   | <b>What section of the Plan was addressed by Consultation?</b>   | Mental Health  |
|   | <b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b> | The agency sent a representative to our community consultation meeting.  |

|    |  |  |
|----|--|--|
| 9  | <b>Agency/Group/Organization</b>   | JUBILEE MINISTRIES, INC  |
|    | <b>Agency/Group/Organization Type</b>  | Neighborhood Group<br>Neighborhood Organization  |
|    | <b>What section of the Plan was addressed by Consultation?</b>   | Housing Need Assessment  |
|    | <b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b> | The agency sent a representative to our community consultation meeting. The City provides general funds to support this organization's Asset Based Community Development Activities. |
| 10 | <b>Agency/Group/Organization</b>   | Westcore Neighbors   |
|    | <b>Agency/Group/Organization Type</b>  | Neighborhood Group<br>Neighborhood Organization  |
|    | <b>What section of the Plan was addressed by Consultation?</b>   | Housing Need Assessment  |
|    | <b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b> | The agency sent a representative to our community consultation meeting and is also a member of the Neighborhood Improvement Committee.   |

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

All local agencies were invited to the consultation.

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

| <b>Name of Plan</b> | <b>Lead Organization</b>   | <b>How do the goals of your Strategic Plan overlap with the goals of each plan?</b>           |
|---------------------|----------------------------|---|
| Continuum of Care   | Lakeshore Housing Alliance | We work with the Lakeshore Housing Alliance to do Continuum of Care planning and coordination |

**Table 3 – Other local / regional / federal planning efforts**

**Narrative (optional)**

Public participation in the CDBG planning process is a key component to developing a plan to address community needs. We are committed to listening and responding to community needs through CDBG and general funding as well as collaboration with multiple agencies to achieve our city's mission of Maximize Livability.

## **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 Neighborhood Improvement Committee is the appointed citizen group that oversees the CDBG program. They review community indicators including housing, income, poverty, and others. The community organizations were invited to a public consultation meeting on February 19, 2019 where we reviewed the CDBG program, past performance and potential uses of funds.

In addition to posting the meeting on the City Website, as well as in the Holland Sentinel the following agencies and City Departments were invited as described below:

Holland City Council, Holland City Department Heads, Fair Housing Center of West Michigan, Good Samaritan Ministries, Boys and Girls Club of the Greater Holland Area, Community Action House, Lakeshore Housing Alliance, Heights of Hope, Latin Americans United for Progress, Lakeshore Habitat for Humanity, Disability Network, Resthaven Patrons, Children’s Advocacy Center, Ottagon Addiction Recovery, Mediation Services of Ottawa and Allegan Counties, Evergreen Commons, Cornerstone Youth Ministries, Center for Women in Transition, Pathways, Ottawa County Red Cross, Ottawa County Human Services Coordinating Council, Arbor Circle, Association for the Blind & Visually Impaired, Bank of Holland, Barnabas House, Bethany Christian Service, Big Brother Big Sisters of the Lakeshore, Black River Public, 70x7 Life Recovery, 3-Sixty, Building Men for Life, Call 2-1-1, Escape, Calvary Baptist School, Catholic Social Services, Child Development Services, City on a Hill Ministries, Every Woman’s Place/Webster House Youth, Feeding America, Heritage Homes, His Harvest Stand, Holland Christian Schools, Holland Deacon Conf., Holland Public Schools, Holland Rescue, Imagine Fellowship, Jubilee Ministries, Ladder Homes, Lakeshore Advantage, Lakeshore Ethnic Diversity Alliance, Legal Aid of West Michigan, Salvation Army, United Way, Westcore Neighbors, Disabled American Veterans, Holland American Legion Band, Holland Area Arts Council, Holland Chorale, Holland Civic Theatre, Holland Museum, Holland Symphony Orchestra, Macatawa Greenway, Maple Avenue Ministries, Pine Rest Christian Mental Health, Special Olympics, and Tulip Time.

As a result of the consultation we hope to develop new activities related to affordable housing. Participants in the consultation meeting indicated developing and making additional affordable housing available is needed. However, we needed to further develop those plans and amend the 5 year Consolidated in order to fund these new activities. The Consolidated Plan has since been amended to add the new activities

The community organizations and individuals have an opportunity to express their general concerns for the community in particular those concerns that could potentially be addressed with CDBG funds. These comments were considered as the NIC developed and recommended CDBG funding allocations to Holland City Council. Public comment on the plan occurred in a 30 day period prior to a public hearing before City Council on July 17, 2019. Council held a public hearing and approved submission of the Annual Action Plan at that meeting. There were no comments at the public hearing.

**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   | Non-targeted/broad community | About a dozen agencies attended the meeting                            | Affordable housing and a suitable living environment were predominant concerns. |  |                     |
| 2          | Public Hearing   | Non-targeted/broad community | Council held a public hearing on June 20 prior to adoption of the plan |   |  |                     |
| 3          | Newspaper Ad     | Non-targeted/broad community |  |   |  |                     |

| 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          | Internet Outreach | Persons with disabilities    | Council published their intention to hold a public hearing on the City's Website. An announcement of the Annual Action Plan comment period was also available on the City's website.                  |                              |  |                     |
| 5          | Public Hearing    | Non-targeted/broad community | A public hearing was held on June 3, 2020 as part of the City's regular City Council meeting relative to Amendments 1 and 2 (CV-Round 1). No one from the public provided comment during the hearing. | No comments were received.   | NA   |                     |

**Table 4 – Citizen Participation Outreach**

## Expected Resources

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

#### Introduction

The City of Holland expects for receive Community Development Block Grant funds during the five year period covered by this Annual Action Plan.

#### 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<br>Admin and Planning<br>Economic Development<br>Housing<br>Public Improvements<br>Public Services | 323,470                          | 10,000             | 283,178                  | 616,648   | 300,000   |                       |

| 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: \$ |   |  |
| Other   | public - federal | Admin and Planning<br>Public Services<br>Other | 390,032                          | 0                  | 0                        | 390,032   | 0   | Rnd 1 = \$191,446<br>Rnd 2 = \$198,586 |

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.**

We intend to require a 25% match for rental development projects. It is also possible we will use our CDBG funds to leverage private investment through the Section 108 Loan 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.**

The City of Holland Property Review Committee has recommended the disposition of a 3-acre undeveloped site. It is anticipated we will partner with a developer for a new mixed income housing development and that CDBG funds will be used to cover site improvement cost such as streets, sidewalks, and utility connections.

### **Discussion**

The City of Holland does an excellent job of leveraging the small entitlement we receive. Owners pay a portion of the project based on their income. We also partner with private individuals, non-profits, churches and others to maximize funds to address community needs.

## 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          | Affordable Housing     | 2015       | 2019     | Affordable Housing                |                 | Affordable Housing    |                                      | Homeowner Housing Rehabilitated: 45 Household Housing Unit   |
| 2          | Public Services        | 2015       | 2019     | Non-Housing Community Development |                 | Public Services       | CDBG: \$42,000<br>CDBG-CV: \$370,586 | Public service activities other than Low/Moderate Income Housing Benefit: 2000 Persons Assisted<br>Homeless Person Overnight Shelter: 30 Persons Assisted<br>Homelessness Prevention: 180 Persons Assisted |
| 3          | Fair Housing Services  | 2015       | 2019     | Fair Housing Services             |                 | Fair Housing Services | CDBG: \$10,000                       | Public service activities other than Low/Moderate Income Housing Benefit: 35000 Persons Assisted   |
| 4          | Program Administration | 2015       | 2019     | Program Administration            |                 |                       | CDBG: \$52,470                       | Other: 35000 Other   |
| 5          | Public Improvements    | 2016       | 2019     | Area benefit activity             |                 |                       | CDBG: \$110,000                      | Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 10000 Persons Assisted  |

**Table 6 – Goals Summary**

## Goal Descriptions

|   |                         |  |
|---|-------------------------|--|
| 1 | <b>Goal Name</b>        | Affordable Housing   |
|   | <b>Goal Description</b> | The City of Holland will continue to operate a Home Repair Program to help low to moderate income homeowners with repairs. The City will also continue our efforts to retrofit homes for reduced energy use through the Home Energy Retrofit Program. We plan to undertake efforts to provide funds to repair rental properties to preserve affordable housing and we plan to work with local developers to develop new rental units and owner-occupied homes for low to moderate income residents.  |
| 2 | <b>Goal Name</b>        | Public Services  |
|   | <b>Goal Description</b> | The City of Holland will provide CDBG funding to increase the number of youth employed through the Holland Youth Connections Program. The program began several years ago as a way to offer first time employment experience for at risk youth. It is funded mostly through private donations. The City provides management and oversight. The added funding will allow the program to hire 20 more youth.<br><br>AMENDMENTS 2 & 3: Regarding planned use of CDBG-CV funds, the City intends to enter into subrecipient agreements with three local non-profit organizations providing housing assistance, emergency shelter, and food assistance to persons impacted by COVID-19. |
| 3 | <b>Goal Name</b>        | Fair Housing Services  |
|   | <b>Goal Description</b> | The City of Holland will contract with the Fair Housing Center of Western Michigan to provide education, training, advocacy and testing for Fair Housing Compliance  |
| 4 | <b>Goal Name</b>        | Program Administration   |
|   | <b>Goal Description</b> | The City of Holland will provide effective, experienced administration of the CDBG program   |

|          |                         |   |
|----------|-------------------------|---|
| <b>5</b> | <b>Goal Name</b>        | Public Improvements   |
|          | <b>Goal Description</b> | The City of Holland will replace sidewalks along pathways to schools and parks in low income neighborhoods. We will install missing sidewalks to complete pathways. |

# Projects

## AP-35 Projects – 91.220(d)

### Introduction

For Fiscal Year 2019-2020 The City of Holland expects to receive Community Development Block Grant Funds of \$330,994; including \$10,000 of program income, for a total budget of \$340,994. Eighty percent (80%) of the funds will go to projects and activities that will directly benefit low-income persons or neighborhoods.

### Projects

| #  | Project Name                   |
|----|--------------------------------|
| 1  | Administration                 |
| 2  | Public Notices- Administration |
| 3  | Fair Housing                   |
| 4  | Home Repair Program            |
| 5  | Home Energy Retrofit Program   |
| 7  | Youth Employment               |
| 8  | Sidewalk Replacement           |
| 9  | CV-Food Assistance             |
| 10 | CV-Homeless Shelter            |
| 11 | CV-Homeless Prevention         |

**Table 7 - Project Information**

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

The City of Holland has historically funded the Fair Housing Center of West Michigan to further fair housing in our community. A large portion of the CDBG grant is used for the City of Holland's Home Repair Program and Home Energy Retrofit Program, which assists low-income home owners with funding repairs made at their homes. The Consultation process identified unmet need for affordable housing, youth employment and sidewalk replacement that could be addressed with CDBG funds. The main obstacle to meeting the many community development needs facing the City is the limited amount of money that City has, both from our own general fund and the entitlement funds we receive from HUD. The Home Energy Retrofit program is new and was slow to get started. Because of this we have the opportunity to make some funds available for new activities. Our Consolidated Plan was amended to add these goals.

**AP-38 Project Summary**  
**Project Summary Information**

|          |  |   |
|----------|--|---|
| <b>1</b> | <b>Project Name</b>  | Administration  |
|          | <b>Target Area</b>   | City of Holland Low Income Areas  |
|          | <b>Goals Supported</b>   | Program Administration  |
|          | <b>Needs Addressed</b>   | Program Administration  |
|          | <b>Funding</b>   | CDBG: \$52,470<br>CDBG-CV: \$19,446   |
|          | <b>Description</b>   | The City of Holland will provide effective administration of the CDBG Program. \$35,552.64 of the estimated funding amount below will be drawn from carry-forward funds.  |
|          | <b>Target Date</b>   | 6/30/2021   |
|          | <b>Estimate the number and type of families that will benefit from the proposed activities</b> | All residents utilizing any of the CDBG funded programs will benefit from the administration of the program.  |
|          | <b>Location Description</b>  | Program administration will take place at City Hall, 270 S. River, Holland, MI 49423  |
|          | <b>Planned Activities</b>  | Sidewalk replacement, Home Repairs and Improvement, Affordable Housing Development, Youth Employment, Fair Housing Services, as well as administration of the program are planned activities  |
| <b>2</b> | <b>Project Name</b>  | Public Notices- Administration  |
|          | <b>Target Area</b>   | City of Holland Low Income Areas  |
|          | <b>Goals Supported</b>   | Program Administration  |
|          | <b>Needs Addressed</b>   | Program Administration  |
|          | <b>Funding</b>   | CDBG: \$2,000   |
|          | <b>Description</b>   | The City of Holland desires public participation in the development and review of our CDBG funded activities. We utilize the Holland Sentinel to publish notices for the Consolidated Plan as required by our Citizen Participation Plan. |
|          | <b>Target Date</b>   | 6/30/2020   |
|          | <b>Estimate the number and type of families that will benefit from the proposed activities</b> |   |
|          | <b>Location Description</b>  | This amount is for publishing public notices in the Holland Sentinel  |

|          |  |   |
|----------|--|---|
|          | <b>Planned Activities</b>  | Public Notices/Newspaper Advertising  |
| <b>3</b> | <b>Project Name</b>  | Fair Housing  |
|          | <b>Target Area</b>   | City of Holland Low Income Areas  |
|          | <b>Goals Supported</b>   | Fair Housing Services   |
|          | <b>Needs Addressed</b>   | Fair Housing Services   |
|          | <b>Funding</b>   | CDBG: \$10,000  |
|          | <b>Description</b>   | Provide Fair Housing Services to residents of the City of Holland.  |
|          | <b>Target Date</b>   | 6/30/2020   |
|          | <b>Estimate the number and type of families that will benefit from the proposed activities</b> |   |
|          | <b>Location Description</b>  | Throughout the City of Holland, Fair Housing will be utilized and testing will be done by the Fair Housing Center of West Michigan.   |
|          | <b>Planned Activities</b>  | Planned Activities include Fair Housing Testing, advocacy and education for landlords and real estate professionals.  |
| <b>4</b> | <b>Project Name</b>  | Home Repair Program   |
|          | <b>Target Area</b>   | City of Holland Low Income Areas  |
|          | <b>Goals Supported</b>   | Affordable Housing  |
|          | <b>Needs Addressed</b>   | Affordable Housing  |
|          | <b>Funding</b>   | CDBG: \$120,524   |
|          | <b>Description</b>   | The City will continue its successful Home Repair Program to help low income home owners with needed repairs. \$33,657.43 of the estimated funding amount below will be drawn from carry-forward funds. |
|          | <b>Target Date</b>   | 6/30/2020   |
|          | <b>Estimate the number and type of families that will benefit from the proposed activities</b> | An estimated 40 low-income households.  |
|          | <b>Location Description</b>  | Low-income households throughout the City limits of Holland.  |

|   |  |  |
|---|--|--|
|   | <b>Planned Activities</b>  | Planned activities include roof replacements, furnace replacements, plumbing repairs, electrical repairs, siding, windows, and insulation, but will not be limited to these categories.  |
| 5 | <b>Project Name</b>  | Home Energy Retrofit Program   |
|   | <b>Target Area</b>   | City of Holland Low Income Areas   |
|   | <b>Goals Supported</b>   | Affordable Housing   |
|   | <b>Needs Addressed</b>   | Affordable Housing   |
|   | <b>Funding</b>   | CDBG: \$30,000   |
|   | <b>Description</b>   | As a part of our Community Energy Plan, the City of Holland will provide grants for deep home energy retrofit work to low to moderate income homeowners.   |
|   | <b>Target Date</b>   | 6/30/2020  |
|   | <b>Estimate the number and type of families that will benefit from the proposed activities</b> | Five low-income households   |
|   | <b>Location Description</b>  | Low-income households throughout the City of Holland   |
|   | <b>Planned Activities</b>  | An energy audit will be conducted prior to the renovation work. Afterward homeowners will be encouraged to do repairs that will have the best return on investment for energy savings. In addition to CDBG grants for qualified households, the City and our Board of Public works will offer other incentives including on-bill financing for the improvements. |
| 6 | <b>Project Name</b>  | Youth Employment   |
|   | <b>Target Area</b>   | City of Holland Low Income Areas   |
|   | <b>Goals Supported</b>   | Public Services  |
|   | <b>Needs Addressed</b>   | Public Services  |
|   | <b>Funding</b>   | CDBG: \$21,000   |
|   | <b>Description</b>   | The City of Holland will hire and engage 16 youth, predominantly during the summer, for an employment and work skills training program. \$7,576.70 of the estimated funding amount below will be drawn from carry-forward funds.   |
|   | <b>Target Date</b>   |  |

|          |  |  |
|----------|--|--|
|          | <b>Estimate the number and type of families that will benefit from the proposed activities</b> | 20 youth in the City of Holland  |
|          | <b>Location Description</b>  | Low income families throughout the City limits of Holland  |
|          | <b>Planned Activities</b>  | Summer employment of at-risk youth.  |
| <b>7</b> | <b>Project Name</b>  | Sidewalk Replacement   |
|          | <b>Target Area</b>   | City of Holland Low Income Areas   |
|          | <b>Goals Supported</b>   | Public Improvements  |
|          | <b>Needs Addressed</b>   | Public Improvements  |
|          | <b>Funding</b>   | CDBG: \$75,000   |
|          | <b>Description</b>   | The City of Holland will replace sidewalks and install new sidewalks on routes to City Parks and public schools in low to moderate income neighborhoods. |
|          | <b>Target Date</b>   | 6/30/2020  |
|          | <b>Estimate the number and type of families that will benefit from the proposed activities</b> | All families living in low income neighborhoods will benefit from utilizing safe walking paths to the parks and schools in their areas.                  |
|          | <b>Location Description</b>  | The City of Holland will replace sidewalks and install new sidewalks on routes to City Parks and public schools in low to moderate income neighborhoods. |
|          | <b>Planned Activities</b>  | Install new sidewalks in low to moderate income neighborhoods.   |
| <b>8</b> | <b>Project Name</b>  | CV-Food Assistance   |
|          | <b>Target Area</b>   | City of Holland Low Income Areas   |
|          | <b>Goals Supported</b>   | Public Services  |
|          | <b>Needs Addressed</b>   | Public Services  |
|          | <b>Funding</b>   | CDBG-CV: \$163,000   |
|          | <b>Description</b>   | Support for food assistance program serving City of Holland residents experiencing effects of COVID-19.  |
|          | <b>Target Date</b>   | 12/31/2022   |

|           |  |  |
|-----------|--|--|
|           | <b>Estimate the number and type of families that will benefit from the proposed activities</b> | 2000 low- to moderate-income individuals   |
|           | <b>Location Description</b>  |  |
|           | <b>Planned Activities</b>  | Emergency food distribution via food pantry or daily lunch program and resource navigation assistance provided to persons experiencing economic challenges related to the effects of COVID-19. |
| <b>9</b>  | <b>Project Name</b>  | CV-Homeless Shelter  |
|           | <b>Target Area</b>   | City of Holland Low Income Areas   |
|           | <b>Goals Supported</b>   | Public Services  |
|           | <b>Needs Addressed</b>   | Public Services  |
|           | <b>Funding</b>   | CDBG-CV: \$64,586  |
|           | <b>Description</b>   | Support for homeless shelter services provided to persons experiencing domestic violence.  |
|           | <b>Target Date</b>   | 12/31/2022   |
|           | <b>Estimate the number and type of families that will benefit from the proposed activities</b> | 30 persons experiencing domestic violence.   |
|           | <b>Location Description</b>  |  |
|           | <b>Planned Activities</b>  | Support for program offering homeless shelter services and related support services to persons experiencing domestic violence due at least in part to effects of COVID-19.                     |
| <b>10</b> | <b>Project Name</b>  | CV-Homeless Prevention   |
|           | <b>Target Area</b>   | City of Holland Low Income Areas   |
|           | <b>Goals Supported</b>   | Public Services  |
|           | <b>Needs Addressed</b>   | Public Services  |
|           | <b>Funding</b>   | CDBG-CV: \$143,000   |
|           | <b>Description</b>   | Support for program providing homelessness prevention services to residents of the City of Holland.  |
|           | <b>Target Date</b>   | 12/31/2022   |

|  |  |  |
|--|--|--|
|  | <b>Estimate the number and type of families that will benefit from the proposed activities</b> | 180 low- to moderate-income persons to be provided homelessness prevention assistance.   |
|  | <b>Location Description</b>  |  |
|  | <b>Planned Activities</b>  | Provision of short-term financial support (rent, security deposit, or utility payments) and related supports to individuals and households facing housing instability due to COVID-19. |

## **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**

Most of our Programs will benefit low to moderate income households throughout the City of Holland. Our sidewalk program will benefit neighborhoods that are 51% or more low to moderate income.

### **Geographic Distribution**

| <b>Target Area</b>               | <b>Percentage of Funds</b> |
|----------------------------------|----------------------------|
| City of Holland Low Income Areas | 40                         |

**Table 8 - Geographic Distribution**

### **Rationale for the priorities for allocating investments geographically**

The rationale for allocating funds to these low to moderate income areas is mostly because the infrastructure in these neighborhoods is the oldest in the City of Holland.

# Affordable Housing

## AP-55 Affordable Housing – 91.220(g)

### Introduction

The City of Holland as a central city of the Holland metro area is home to a large share of affordable housing. Much of the affordable housing supply for the metro area is located within the City of Holland. For this reason, the efforts to foster affordable housing are typically done on individual homes or projects where rehabilitation assistance or energy improvements will help existing homeowners maintain or improve affordability through reduced repair cost or reduced energy costs.

While we continue to make a priority of helping low income homeowners, and advocate for the development of affordable housing throughout the metro area, we are considering the possibility of providing some funds for affordable housing development.

The City of Holland has also advocated for cooperative housing planning within the MACC metro area to encourage the development of affordable housing options in scattered sites throughout the metro area. Because Michigan is a home-rule state, these efforts are only going to be voluntary and not orchestrated by a regional government. To date progress in discussing scattered-site affordable housing has been very limited and has not resulted in any metro area plans to develop a fair share of affordable housing outside of the City of Holland.

The lack of affordable housing in our community is extremely high. Overall vacancies are scarce. When units become available they are usually bought or rented almost instantly. There is no realistic way we can address the deficit of 15,000 units in the City of Holland due to lack of available open land for development. However, we feel as this is a community priority we should allocate funds to allow us to partner with developers and rental property owners whenever possible to address this pressing community need. To address this need will provide funds for renovation of existing units, increase affordability by reducing utility expenses, and work to develop new units where possible.

| <b>One Year Goals for the Number of Households to be Supported</b> |    |
|--|----|
| Homeless   | 0  |
| Non-Homeless   | 45 |
| Special-Needs  | 0  |
| Total  | 45 |

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

| <b>One Year Goals for the Number of Households Supported Through</b> |   |
|--|---|
| Rental Assistance  | 0 |
| The Production of New Units  | 0 |
| Rehab of Existing Units  | 0 |

| <b>One Year Goals for the Number of Households Supported Through</b> |   |
|--|---|
| Acquisition of Existing Units  | 0 |
| Total  | 0 |

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

### **Discussion**

The City of Holland is committed to being a positive partner in the development of our community. To this end we are concentrating on helping low income homeowners address home repair and energy improvement needs.

## **AP-60 Public Housing – 91.220(h)**

### **Introduction**

Public housing units do exist in the City of Holland; however, the assistance provided to these units is administered by the Michigan State Housing Development Authority and not by a local Public Housing Authority. With MSHDA as the public housing authority that has jurisdiction in the City of Holland, MSHDA has not been identified as a “troubled” PHA with regard to these units, which would require additional assistance for these units to be included in this plan. We are prepared as a community to offer assistance in the form of CDBG funds, PILOTS, NEZ’s and other tax incentives at our disposal to assist in the development of units by MSHDA and its partners.

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

The City of Holland works with Good Samaritan Ministries which is the designated housing intake agency in our Continuum of Care. People wishing to apply for housing choice vouchers can apply through this agency. Further staff continues to work as part of the Lakeshore Housing Alliance to address community affordable housing. We are prepared to assist MSHDA, our Public Housing Agency with development of new affordable units in the City of Holland through CDBG funds and other incentives.

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

n/a

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

n/a

### **Discussion**

Efforts to create a HUD approved county-wide public housing agency have not been realized. The State of Michigan remains the Public Housing Agency in our community and offers loans, grants and rental assistance to residents. Housing Choice Vouchers are managed by Community Development Associates, a private company. Residents access this resource through our local designated housing intake agency. Good Samaritan Ministries and through one of several project-based housing choice voucher facilities.

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

### **Introduction**

Traditionally the City has not funded homelessness activities directly. But we are an active partner in the Lakeshore Housing Alliance, and Ottawa Housing Next. One of our roles in the Lakeshore Housing Alliance is to serve on the Allocation and Accountability Committee which determines what agencies will be funded for homeless and special needs funding under the 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 Holland participates as a member of the Lakeshore Housing Alliance (LHA) to coordinate and plan services for homeless and other special populations. The LHA is the official Continuum of Care planning body for Ottawa County and will address these needs through the continuum of services that the City of Holland will help plan. The continuum of services will span all the way from outreach to homeless on the street through homeless prevention to emergency shelters with temporary housing and services, to transitional housing and services to foster self-sufficiency, to homeownership programs and permanent supportive housing for special needs. This ongoing work has continued for five years and will again involve the City of Holland as a solid essential partner.

### **Addressing the emergency shelter and transitional housing needs of homeless persons.**

The City of Holland Community is served by the Holland Rescue Mission that provides emergency shelter and Good Samaritan Ministries and Center for Women in Transition that provides transitional housing. While these organizations do not currently receive direct support from the City for these specific programs, the City does provide technical support as needed, as it relates to housing inspections through our rental inspection program, research, and letters of support.

### **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 of Holland Community is fortunate to have several non-profit social service agencies that provide these services; these organizations typically make up the membership of the Lakeshore Housing Alliance.

### **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 of Holland does not provide these services directly but works closely with the local Continuum of Care organizations to address homeless needs

### **Discussion**

The City of Holland through the local Continuum of Care organization is actively involved in helping meet needs of local homeless and special needs populations. This multi-jurisdictional approach to addressing these needs is desirable and much more sustainable than working independently as a city. We do not have the resources to make a significant impact on homeless and special needs issues and therefore count on regional collaboration to address the issues of these populations.

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

### **Introduction:**

The City of Holland is already home to a large share affordable housing when considering the whole Holland housing market. Analysis done in the Five-Year Consolidated Master Plan regarding regulatory barriers to affordable housing has shown that the City of Holland is not putting up barriers to affordable housing. The amount of affordable housing in Holland verifies that fact. The biggest barrier to Affordable Housing is lack of supply. Analysis shows there is a need for an additional 15,000 housing units in our county. Our local housing market is strong and it is very difficult to find any housing, especially housing affordable to people at 60% AMI or less. One of the biggest barriers is funding. We are working with Ottawa Housing Next to try to address the availability of affordable housing in the region. The City stands prepared to offer CDBG funding, or other incentives to develop new housing.

**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 of Holland will continue to seek ways to work with neighboring governments to develop more scattered-site affordable housing. The City of Holland continues to work with the Lakeshore Housing Alliance to ensure that all residents will have access to Affordable Housing with the entire Holland Metro Area. In addition, we have recently been engaged in the Michigan Economic Development Corporation's (MEDC) Redevelopment Ready Communities Program. As a part of the program we will work with the MEDC to streamline our development process and eliminate barriers to development.

### **Discussion:**

The City of Holland's participation in local housing planning efforts is desirable as the need is much greater than we can address only as a city organization. These regional planning efforts are aimed at adding new affordable housing units throughout the county.

## **AP-85 Other Actions – 91.220(k)**

### **Introduction:**

The City of Holland has adopted a number of activities to address underserved needs on a regional basis including the Consolidated Plan, Cooperative Housing Planning with the regional planning agency, the MACC, the Lakeshore Housing Alliance and Ottawa Housing Next. We follow EPA requirements for Lead-Based Paint Mitigation, work with many agencies to reduce poverty, develop institutional structure and enhance inter-agency coordination.

### **Actions planned to address obstacles to meeting underserved needs.**

Consolidated Planning and the use of a Consolidated Plan Strategy is the communication tool that the City of Holland uses to address under-served needs and address obstacles to meeting those needs. Agencies and citizens are encouraged to identify these types of needs that are not adequately addressed by the strategy and these under-served needs are brought in with data and information to be addressed. Through this process, under-served needs and associated obstacles are considered by the Neighborhood Improvement Committee, City Council and eventually agencies and City departments until a program or solution is brought to bear on the need. This process of identifying the under-served need and addressing the obstacles until the need is met by an activity in the Consolidated Strategy and eventually by a program or agency is precisely what the Consolidated Plan is intended to do. Action is influenced by this process and community resources/agencies are triggered to get involved and do something.

### **Actions planned to foster and maintain affordable housing.**

Much of the affordable housing supply for the metro area is located within the City of Holland. For this reason, the efforts to foster affordable housing are typically done on individual homes or projects where rehabilitation assistance or energy improvements will help existing homeowners maintain or improve affordability through reduced repair cost or reduced energy costs. However, our consultation process along with our involvement with the Lakeshore Housing Alliance and Ottawa Housing next has helped solidify regional planning for affordable housing development. Rents have gone up and housing supply has not increased to meet demands. New affordable housing still needs to be developed throughout the county and we will continue to advocate for that. The need is such that all housing partners need to increase the amount of housing developed at all levels community-wide. Affordable housing will most likely not be developed without subsidies.

The City of Holland has also advocated for cooperative housing planning within the MACC metro area to encourage the development of affordable housing options in scattered sites throughout the metro area. Because Michigan is a home-rule state, these efforts are only going to be voluntary and not

orchestrated by a regional government.

### **Actions planned to reduce lead-based paint hazards**

Currently the City of Holland operates several programs that focus on rehabilitating homes that may or may not contain lead. These programs are funded by Federal, State and Local Funds. These city rehabilitation programs are designed to allow the homeowner, with technical assistance from city staff, to decide the best approach to address their rehabilitation project. These rehabilitation programs utilize an educational component and a project-specific design to prevent lead hazards. These two approaches include educating homeowners about identifying potential lead hazards and the dangers these hazards can have on young children and pregnant women and determining appropriate measures to address the rehabilitation project, such as safe work practices.

With every Home Repair/Home Energy Retrofit Application distributed the City of Holland includes a United States Environmental Protection Agency produced pamphlet titled "Protect Your Family from Lead in Your Home". This pamphlet is very useful to the homeowners by informing homeowners of the dangers of lead poisoning, how and who to check for lead poisoning, where lead hazards are typically located in a home, how to check for lead hazards in your home, how to address known lead hazards, how to prevent future lead hazards, how to significantly reduce lead hazards, and precautions to take when renovating a home to reduce the worsening of a lead hazard.

When a homeowner has chosen a rehabilitation project that will disturb a painted surface above the de minimus level established by the Department of Housing and Urban Development specific measures are incorporated into the program design to ensure that lead hazards are properly addressed. These measures follow the requirements set forth by the Department of Housing and Urban Development in TITLE 24--HOUSING AND URBAN DEVELOPMENT PART 35--LEAD-BASED PAINT POISONING PREVENTION IN CERTAIN RESIDENTIAL STRUCTURES 24 CFR35 Subpart J-Rehabilitation Assistance.

### **Actions planned to reduce the number of poverty-level families.**

Since poverty-level designation is an income issue, only improved earning capability can address this problem. Any other programs or activities that provide assistance to address the symptoms of poverty such as inadequate housing, poor health care, inability to feed and clothe household dependents does not address the real cause of poverty. The City of Holland's Neighborhood Improvement Strategy describes appropriate efforts to address the symptoms of poverty by calling for adequate access to the provision of food and health and beauty items to people experiencing food insecurity, and the availability of health care facilities to all residents.

Furthermore, the strategy addresses economic independence for all income groups including poverty level households. These activities address two of the major causes of housing need (employment and education that do not generate enough income for self-sufficiency) as well as the symptoms (lack of adequate household income). Activities which promote job training and education attainment to

upgrade income earning potential and to provide micro business opportunities are important steps that are advocated in the City of Holland's strategy. The City is involved in regional economic development activities through the Lakeshore Advantage.

**Actions planned to develop institutional structure.**

The City of Holland is the organization responsible for implementing the activities of this 1-year plan as discussed in each of the activity descriptions. Additionally, the City of Holland provides services directly to citizens through several City departments where management and delivery of services is monitored through the City's budget/goal review process. The combination of highly capable and well-run non-profit community service agencies and well managed City departments has provided an institutional structure that has been very effective in meeting the goals set forth in the City of Holland's Consolidated Plan.

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

The City of Holland is a voting member of the Lakeshore Housing Alliance. This Alliance is an ongoing coordination activity that has been discussed throughout the Consolidated Plan that is an excellent example of enhanced coordination between public and private housing organizations. The LAH has received federal funding once again this year.

Additionally, the City of Holland has continued a dialog with its MACC partner governments to discuss cooperative planning within the Holland/Zeeland Metro area which is considered the MACC area. Since health and human services are delivered within metro-centers, the City of Holland is asking its MACC partners to consider planning together and consider joint funding at some point in the future. This effort is expected to continue to mature during this annual plan period.

**Discussion:**

Regional planning and coordination efforts have begun to develop specifically around the areas of affordable housing and social service delivery. We expect that during the next year some of these efforts will result in additional affordable housing and better coordination of services. New institutional structures have formed over the last several years and are enhancing efforts toward improved service delivery on a regional basis.

## Program Specific Requirements

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

#### Introduction:

During the Annual Action Plan Period of July 1, 2019 to June 30, 2020, approximately 80% of funds will be used to directly benefit low to moderate income households. We anticipate \$10,000 in program income will be generated and reinvested in local activities

#### 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  | 10,000        |
| 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             |
| <b>Total Program Income:</b>   | <b>10,000</b> |

#### 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. | 80.00% |

We have historically used at least 80% of CDBG funds to benefit low and moderate income households. One fiscal year 2019, is covered in this Annual Action Plan.