

## **Executive Summary**

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

#### 1. Introduction

The City of West Des Moines (City) has been identified as an entitlement community under the U.S. Department of Housing and Urban Development's (HUD) Community Development Block Grant (CDBG) Program. Entitlement communities include local governments with 50,000 or more residents, other local governments designated as central cities of metropolitan areas, and urban counties with populations of at least 200,000. West Des Moines is an entitlement community because it is considered a local government with 50,000 or more residents.

The City is required by HUD to have an approved Consolidated Plan (Plan) to receive the annual CDBG entitlement grant, and the Plan must be updated every five years. The Plan fulfills the application and reporting requirements for entitlement communities and contains a strategic plan/annual action plan describing how the jurisdiction will use its CDBG funds. This Plan will address the time period of July 1, 2024 to June 30, 2025.

#### 2. Summarize the objectives and outcomes identified in the Plan

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

The City has five overall goals for meeting housing and community development needs during the 2020-24 Program Years:

- Produce and preserve both renter-and owner-occupied affordable housing
- 2. Address infrastructure needs that are tied to affordable housing or job creation;
- 3. Reduce the number of homeless families and individuals through homeless prevention programs
- 4. Maintain the City's ability to support the provision of special needs services, specifically as they are tied to affordable housing or job creation, meet the most urgent needs in the community and reduce demands on other city services; and
- 5. Explore the possibility of leveraging the initial allocation (or allocations) to have a larger initial impact.

#### 3. Evaluation of past performance

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

The City has been successful in allocating the CDBG funds to a variety of programs. Some programs are funded year after year as they are very well used by the citizens of West Des Moines. The City is also creative with our use of CDBG funds; to find a new program that will provide the most benefit to the income qualifying residents of West Des Moines.

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

Summary from citizen participation section of plan.

The significant aspects of the process to prepare the strategic plan/annual action plan include:

- Evaluated current housing and community development programs
- Analyzed data from several sources to develop a statistical picture of the City
- 2018 City of West Des Moines Housing Needs Assessment
- Current issues in the community that have arisen since the Consolidated Plan was adopted in 2020
- Discussion with the Human Services Department regarding needs from their clients

The Public Comment Period began on May 30, 2024 through June 28, 2024.

The Public Comment Period was advertised in the following ways:

- Des Moines Register Public Notice
- Front page item on the City's website
- Email to housing authorities noticing them of plan Central Iowa Regional Housing Authority & Des Moines Municipal Housing Agency

The Annual Action Plan were available for review at the following locations:

- Online at the City of West Des Moines website www.wdm.iowa.gov
- In person at City Hall 4200 Mills Civic Parkway, West Des Moines
- West Des Moines Human Services 139 6th Street, West Des Moines
- Historic City Hall Historic Valley Junction Foundation 137 5th Street, West Des Moines

Comments on the 2024-25 Annual Action Plan may be submitted by:

Email to christine.gordon@wdm.iowa.gov

• Written on forms in the copies of the Plan at locations listed above

### 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.

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

#### 7. Summary

The mission of the City of West Des Moines is to serve the people of West Des Moines honestly and effectively. Through a variety of services, we strive to provide the quality of life desired by the community.

## 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	WEST DES MOINES	Community & Economic Development	

Table 1 – Responsible Agencies

#### **Consolidated Plan Public Contact Information**

Christine Gordon, Housing & Community Development Manager

4200 Mills Civic Parkway, Suite 2B

PO BOX 65320

West Des Moines, IA 50265

515-273-0770

christine.gordon@wdm.iowa.gov

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

#### 1. Introduction

The significant aspects of the process to prepare the strategic plan/annual action plan include:

- Evaluated current housing and community development programs
- Analyzed data from several sources to develop a statistical picture of the City
- 2018 City of West Des Moines Housing Needs Assessment

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))

Both the Community and Economic Development Department and the Human Services Department assess their clients and make appropriate referrals to other agencies for services that include assisted housing, mental health, and service agencies.

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.

Homeward, formerly known as Polk County Continuum of Care, serves as the homeliness planning organization for Polk County. The City's Mayor is the Chairman for the Polk County Homeless Coordinating Council.

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

The City of West Des Moines does not receive ESG funds.

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

Table 2 – Agencies, groups, organizations who participated

1	Agency/Group/Organization	WEST DES MOINES HUMAN SERVICES
	Agency/Group/Organization Type	Other government - Local
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Homelessness Strategy Non-Homeless Special Needs Anti-poverty Strategy
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	The West Des Moines Human Services Department administers the Homeless Prevention Program with CDBG dollars. In addition, the department offers other services to low income residents of West Des Moines. The staff in Human Services provides knowledge of the needs of low-income citizens of West Des Moines.
2	Agency/Group/Organization	West Des Moines Fire Department
	Agency/Group/Organization Type	Agency - Emergency Management
	What section of the Plan was addressed by Consultation?	Resiliency
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	
3	Agency/Group/Organization	CGM Inc
	Agency/Group/Organization Type	Services - Broadband Internet Service Providers Services - Narrowing the Digital Divide

	What section of the Plan was addressed by Consultation?	Broadband needs
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	The City of West Des Moines works with CGM, Inc. on a website for the American Connectivity Program. Conversations related to the latest needs for that program and other needs beyond.
4	Agency/Group/Organization	Ovation Networks, Inc
	Agency/Group/Organization Type	Services - Broadband Internet Service Providers Services - Narrowing the Digital Divide
	What section of the Plan was addressed by Consultation?	Broadband Needs
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Ovation is the organization for the City's current wi-fi program in Valley Junction.  Conversations about the future of that program and how needs are changing with technology.

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

Not applicable

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

Name of Plan	Lead Organization	How do the goals of your Strategic Plan overlap with the goals of each plan?		
Continuum of	Homoward	Continuum of Care has the goal to end homelessness. West Des Moines has a program to assist		
Care	Homeward	homeless prevention in the City.		
Workforce		The Workforce Housing Study determined the number of housing units needed in the area before		
	Capital Crossroads	2038. It looked at the number of net new workers to the region. These numbers influenced the goals		
Housing Study		of the West Des Moines Consolidated Plan and the Strategic Plan/Annual Action Plan.		

Table 3 – Other local / regional / federal planning efforts

### **AP-12 Participation – 91.105, 91.200(c)**

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

The significant aspects of the process to prepare the strategic plan/annual action plan include:

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- 2018 City of West Des Moines Housing Needs Assessment
- Current issues in the community that have arisen since the Consolidated Plan was adopted in 2020
- Discussion with the Human Services Department regarding needs from their clients

The Public Comment Period began on May 19, 2023 through June 17, 2023.

The Public Comment Period was advertised in the following ways:

- Des Moines Register Public Notice
- Front page item on the City's website
- Email to housing authorities noticing them of plan Central Iowa Regional Housing Authority & Des Moines Municipal Housing Agency

The Annual Action Plan were available for review at the following locations:

- Online at the City of West Des Moines website www.wdm.iowa.gov
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- West Des Moines Human Services 139 6th Street, West Des Moines
- Historic City Hall Historic Valley Junction Foundation 137 5th Street, West Des Moines

Comments on the Annual Action Plan may be submitted by:

Annual Action Plan 2024

- Email to christine.gordon@wdm.iowa.gov
- Written on forms in the copies of the Plan at locations listed above

A public hearing is scheduled for June 19, 2023 at City Council at 5:30 pm.

No public comments were received during the public comment period or during the public hearing.

## **Citizen Participation Outreach**

Sort Orde r	Mode of Outreac h	Target of Outreac h	Summary of response/attendanc	Summary of comments receive	Summary of comment s not accepted	URL (If applicable)
			е	d	and reasons	
	Internet	Non-	Not applicable	No public	No public comments	www.wdm.iowa.go
1	Outreach	targeted/broad community	Not applicable	received.	were received.	V
2	Public Hearing	Non- targeted/broad community	No public comments were received.	No public comments were received.	No public comments were received.	
3	Newspaper public notice	Non- targeted/broad community	Not applicable	No public comments were received.	No public comments were received.	
4	Email to housing authorities	Residents of Public and Assisted Housing	No public comments were received.	No public comments were received.	No public comments were received.	

Table 4 – Citizen Participation Outreach

# **Expected Resources**

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

#### **Anticipated Resources**

Program	Source	Uses of Funds	Expec	ted Amoun	Expected	Narrative		
	of		Annual	Program	Prior Year	Total:	Amount	Description
	Funds		Allocation:	Income:	Resources:	\$	Available	
			\$	\$	\$		Remainder	
							of ConPlan	
CDBG	nublic	Acquisition					\$	The prior
CDBG	public	Acquisition						The prior
	-	Admin and						year
	federal	Planning						resources
		Economic						from
		Development						previous
		Housing						CDBG years
		Public						will be spent
		Improvements						in 2024-25
		Public						toward
		Services						acquisition
								and new
								housing
			299,829	0	675,378	975,207	300,000	development.

**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

The City of West Des Moines has been granted only CDBG funds. This is the fifth year of the Consolidated plan and includes \$299,829 for the 2024-25 CDBG Program. The FY 2024-25 action plan provides funds for Administration, Transit Pass Program, Homeless Prevention, and Radon Mitigation.

In the use of funds for acquisition and housing development, outside funds will be used by non-profit organizations for the rehabilitation and construction of housing.

If appropriate, describe publically owned land or property located within the jurisdiction that may be used to address the needs identified in the plan					
Not applicable.					

# **Annual Goals and Objectives**

# **AP-20 Annual Goals and Objectives**

## **Goals Summary Information**

Sort	Goal Name	Start	End	Category	Geographic	Needs Addressed	Funding	Goal Outcome Indicator
Order		Year	Year		Area			
1	Transportation	2020	2024	Non-Housing	City of West	Transportation	CDBG:	Public service activities other than
	Services			Community	Des Moines	Services	\$28,800	Low/Moderate Income Housing
				Development				Benefit: 100 Persons Assisted
2	Homeless	2020	2024	Affordable Housing	City of West	Homeless	CDBG:	Homelessness Prevention: 40
	Prevention				Des Moines	Prevention	\$16,181	Persons Assisted
3	Home Repair	2020	2024	Affordable Housing	City of West	Home Repair	CDBG:	Homeowner Housing
					Des Moines		\$194,923	Rehabilitated: 38 Household
								Housing Unit

Table 6 – Goals Summary

## **Goal Descriptions**

1	Goal Name	Transportation Services
	Goal Description	Provide Transit Pass for the DART system to low income individuals for a 12 month period (July 2024 to June 2025).
2	Goal Name	Homeless Prevention
	Goal Description	Provide financial assistance with rent, mortgage, and utilities to low income households.
3	Goal Name	Home Repair
	Goal Description	Provide radon testing and mitigation to households below 80% area median income.

## **Projects**

## AP-35 Projects - 91.220(d)

#### Introduction

The City is continuing to fund programs that have been successful and used by the community. An additional program, land acquisition, has been created to create additional affordable homeownership opportunities.

#### **Projects**

#	<b>Project Name</b>

**Table 7 - Project Information** 

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

The City continues to fund the Transit Pass Program and the Homeless Prevention Program. Both have been successful programs since first funded in 2005. The Transit Pass Program has had to evolve as DART changes. Fewer passes can be purchase today because of rising cost per pass.

The Homeless Prevention Program continues to be well utilized. This program had a large increase in funding with the additional CDBG COVID dollars. This year, 2024-25, the program is back to prepandemic funding level. The maximum limit per household has been increased to \$1,000 because of the increased cost of rent in the City.

# **AP-38 Project Summary**

# **Project Summary Information**

Project Name	Target Area	Goals Supported	Needs Addressed	Funding	Description	Target Date	Estin			
							and t			
							that			
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							activ			
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## 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

Investments will not be allocated geographically.

### **Geographic Distribution**

Target Area	Percentage of Funds
City of West Des Moines	100
VJ	

**Table 8 - Geographic Distribution** 

Rationale for the priorities for allocating investments geographically

Not applicable.

# **Affordable Housing**

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

#### Introduction

The number of households supported through affordable housing is the total of the minimum number of households expected to be assisted through the Homeless Prevention Program and Radon Mitigation Program.

One Year Goals for the Number of Households to be Supported	
Homeless	0
Non-Homeless	48
Special-Needs	0
Total	48

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

One Year Goals for the Number of Households Supported Through	
Rental Assistance	0
The Production of New Units	0
Rehab of Existing Units	38
Acquisition of Existing Units	0
Total	38

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

#### Discussion

The one-year goals for the number of households to be supported includes 38 non-homeless households through the Radon Mitigation Program and 10 non-homeless households (40 persons) through the Homeless Prevention Program.

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

#### Introduction

There are no public housing units in the City of West Des Moines.

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

There are no public housing units in the City of West Des Moines.

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

There are no public housing units in the City of West Des Moines.

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

Not applicable.

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

The City of West Des Moines is the only city in Iowa which has its own Human Services Department. While, the City does not have a shelter or transitional housing, many other basic needs services are offered to homeless families and individuals

The City of West Des Moines offers the Homeless Prevention Program to assist renters and homeowners to remain in their homes. The programs provides financial assistance to pay rent/mortgage and utilities.

The City of West Des Moines does not have any homeless shelters.

Through the Human Services Department of the City of West Des Moines, services are offered to homeless individuals and families including a food pantry, clothing closet, medical clinic, and support services.

# 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

Homeward, formerly known as the Polk County Continuum of Care, will continue to address the emergency, transitional, and permanent housing needs of homeless individuals, families, and special needs population. The Mayor of West Des Moines is the Chairman of the Homeless Coordinating Council for Homeward. As such, he is actively involved in the needs of homeless individuals in West Des Moines and Polk County.

The Human Services Department works with the homeless in West Des Moines every day through their programs including food pantry, clothing closet, medical clinic, and support services.

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

Homeward will continue to address the emergency, transitional, and permanent housing needs of homeless individuals, families, and special needs population. The Mayor of West Des Moines is the Chairman of the Homeless Coordinating Council for Homeward. As such, he is actively involved in the needs of homeless individuals in West Des Moines and Polk County. The City of West Des Moines does not provide direct emergency shelter or transitional housing services for homeless persons.

#### 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

Homeward will continue to address the emergency, transitional, and permanent housing needs of homeless individuals, families, and special needs population. The Mayor of West Des Moines is the Chairman of the Homeless Coordinating Council for Homeward. As such, he is actively involved in the needs of homeless individuals in West Des Moines and Polk County. The City of West Des Moines does not provide direct emergency shelter or transitional housing services for homeless persons.

While the City does not have a shelter of its own, the various support services by the Human Services Department of the City assist homeless persons and recently homeless persons with their basic needs.

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 West Des Moines offers the Homeless Prevention Program to assist low-income individuals and families avoid becoming homeless.

The Mayor of West Des Moines is the Chairman of the Homeless Coordinating Council for Homeward. As such, he is actively involved in the needs of homeless individuals in West Des Moines and Polk County.

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

#### Introduction:

Housing efforts by the City in the last 10 years (since 2014):

- Phenix School Apartments 17 mixed income rental units
- Neighborhood Finance Corporation City provides dollars to NFC for their home purchase and home rehabilitation programs
- Two single-family houses on 8th Street City assisted with the redevelopment of this site for two new construction affordable single-family homes built by Habitat for Humanity
- Valley Station 52 units of affordable senior rental housing
- Upper Story Housing 4 separate projects with a total of 39 affordable rental units
- Keystone Phase I 42 units of affordable rental housing
- Concord at Marketplace 3 buildings with a total of 156 units of affordable senior rental housing
- Historic West Des Moines Housing Fund City raised \$1.6 million in private funds and matched those dollar-for-dollar to create three programs - Home Improvement Program (as of December 31, 2023 - 48 homes assisted), Down Payment Assistance, and Rental Transition Program (two properties acquired which will result in 4 single-family owner-occupied affordable homeownership).
- West Des Moines was named an Iowa Thriving Community in 2023 by the Iowa Finance Authority/Iowa Economic Development Authority
- Metro Home Improvement Program City administers an owner-occupied housing rehabilitation program
- Dallas County Local Housing Trust Fund City administers an owner-occupied housing rehabilitation program

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 West Des Moines is currently updating its Comprehensive Plan. As part of that zoning ordinances are being reviewed as they relate to the creation of affordable housing. It is expected ADU's will be added as allowable with the new zoning code.

The City also modified the policy related to garage requirement on new construction. Non-profits can apply for a waiver to the garage requirement if the house is being sold to a low-income household.

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

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

The City of West Des Moines completed a Housing Needs Assessment in 2018. The Assessment has assisted the City in planning efforts related to affordable housing.

A regional Workforce Housing Study was completed in 2019 establishing the number of affordable housing units needed in the next 20 years for the region. West Des Moines was a part of the development of that plan and its implementation.

The City has joined the efforts of the City of Des Moines and Polk County to develop a Community Land Trust. This work is just beginning. It is anticipated a Community Land Trust would be in place by the end of 2025.

### Actions planned to foster and maintain affordable housing

The City will continue to offer the Metro Home Improvement Program for owner-occupied rehabilitation. The City has also funded the Upper Story Housing Program in Valley Junction through the Woodland Hill Housing TIF. This program provides funding for low-income rental units for a period of 15 years. Development Agreements have been signed that will provide a total of 39 affordable rental units among 4 buildings.

Beginning in July 2022, the City of West Des Moines launched its Historic West Des Moines Housing Fund which is a public private partnership to create a fund of \$3.2 million. The Fund provides three programs - Home Improvement Program, Down Payment Assistance, and Rental Transition Program.

The City continuously looks for ways to advance the efforts of affordable housing and increase opportunities; one of those being participation in the Community Land Trust efforts.

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

The City will continue to offer the Metro Home Improvement Program for owner-occupied rehabilitation.

Polk County has an extensive Lead-Based paint program and the City will make appropriate referrals to them.

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

The City will continue to provide the Homeless Prevention Program to assist individuals and families to avoid homelessness. In addition, their other support services such as the food pantry, clothing closet and medical clinic assist those households.

The City will continue to work with economic development partners, in addition to private developers, to create an economic environment that will create more job opportunities in the area. This will in turn reduce the number of poverty level families. Economic Development is the other half of the Community & Economic Development Department of the City. Housing and Economic Development staff work side by side to address these needs and advance efforts.

#### Actions planned to develop institutional structure

The City will continue to work with partners in the area to maximize resources to enhance the institutional structure to address housing and non-housing community development needs.

In 2022, the housing staff of the City was expanded from 1 1/2 FTE to 2 1/2 FTE. This greatly increase the capacity of staff to address the wide variety of housing needs in the community. It is hoped this level of staff will continue or be increased at some point in the future.

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

The City will continue to offer the Metro Home Improvement Program which is a partnership of 8 cities in Polk County. In addition, the City will work with non-profit agencies and developers to further the development and redevelopment of housing and social service programs in the City. Housing staff is in contact with local non-profit partners weekly regarding various issues. The City relies on those partnerships to further the affordable housing efforts.

Specifically, the City is working with the Greater Des Moines Habitat for Humanity on the rehabilitation of one house and the construction of three new single-family houses.

# **Program Specific Requirements**

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

#### Introduction:

The City does not anticipate receiving any program income as the majority of previous programs were all used as grant dollars. If program income is received, it will be included in future program needs.

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

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

1. The total amount of program income that will have been received before the start of the next	
program year and that has not yet been reprogrammed	0
2. The amount of proceeds from section 108 loan guarantees that will be used during the year to	
address the priority needs and specific objectives identified in the grantee's strategic plan.	0
3. The amount of surplus funds from urban renewal settlements	0
4. The amount of any grant funds returned to the line of credit for which the planned use has not	:
been included in a prior statement or plan	0
5. The amount of income from float-funded activities	0
Total Program Income:	0
Other CDBG Requirements	
	_
1. The amount of urgent need activities	0
2. The estimated percentage of CDBG funds that will be used for activities that benefit	
persons of low and moderate income. Overall Benefit - A consecutive period of one,	
two or three years may be used to determine that a minimum overall benefit of 70%	
of CDBG funds is used to benefit persons of low and moderate income. Specify the	
years covered that include this Annual Action Plan.	100.00%

The City does not anticipate utilizing funds for urgent needs.