

Rapid City, SD

**COMMUNITY DEVELOPMENT
BLOCK GRANT ACTION PLAN
FY 2013
RAPID CITY, SD**



**SUBMITTED TO:
U.S. DEPARTMENT OF
HOUSING AND URBAN DEVELOPMENT**

DRAFT

EXPECTED RESOURCES

AP-15 EXPECTED RESOURCES

Introduction

Rapid City estimates that it will receive \$425,000 in entitlement funds each year for 2013-2017, for a total of \$2,145,000.

The City provides Investment Funds from the General Fund in the amount of \$100,000 per year for Public Health and Services to non-profit organizations to provide services to the community. In anticipation of possible reductions in the annual allocation, estimates are for \$100,000 for FY 2013 with \$300,000 total for the remaining 4 years.

Anticipated Resources

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
CDBG	public - federal	Acquisition Admin and Planning Economic Development Housing Public Improvements Public Services	425,000	4,000	0	429,000	2,145,000	Maximum Program Administration = \$429,000; Maximum Public Services = \$321,750; Housing and Public Facilities = \$1,394,250
General Fund	public - local	Public Services	100,000	0	0	100,000	300,000	The City provides \$100,000 annually for Public Service needs from the City

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: \$		
								Investment Fund.

Table 56 - 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

Rapid City is an entitlement city only for CDBG funding. HOME and Emergency Shelter, and Shelter Plus Care funds are administered through South Dakota Housing Development Authority and HOPWA is administered through the Minnehaha County Housing Authority on a state-wide competitive basis.

Non-profit agencies funded with CDBG dollars are able to leverage other federal, state, local, and private funds. Leveraging CDBG funds is a factor that is taken into consideration as part of the application evaluation process and funding decisions.

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

There is no publically owned land or property available for use in addressing the identified needs of the plan.

Discussion

ANNUAL GOALS AND OBJECTIVES

AP-20 Annual Goals and Objectives

Goals Summary Information

Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
Acquisition for Housing	2015	2017	Affordable Housing	Rapid City Corporate Limits	Property Acquisition for Benefit of LMI Persons	CDBG: \$80,000	Homeowner Housing Added: 1 Household Housing Unit Direct Financial Assistance to Homebuyers: 6 Households Assisted
Rehabilitation - Existing Housing	2013	2017	Affordable Housing	Rapid City Corporate Limits	Housing Rehabilitation Transitional Housing Handicap Services and Modifications	CDBG: \$85,070	Rental units rehabilitated: 10 Household Housing Unit Homeowner Housing Rehabilitated: 11 Household Housing Unit
Public Facilities	2013	2017	Public Facilities	Rapid City Corporate Limits Census Tract - 111 Sioux Park/Old Canyon Lake	Public Facilities - Fire Sprinkler Systems Public Facilities - Energy Efficiency Improvements Public Facilities - Senior Facilities Public Facilities - General Acquisition of	CDBG: \$110,427	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 3580 Persons Assisted

Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
Legal Assistance	2013	2017	Homeless Non-Homeless Special Needs	Rapid City Corporate Limits	Property for Public Facilities Legal Services	CDBG: \$5,000	Public service activities other than Low/Moderate Income Housing Benefit: 15 Persons Assisted
Counseling Services	2013	2017	Non-Homeless Special Needs	Rapid City Corporate Limits	Counseling Services Youth Programs and Services	CDBG: \$7,000	Public service activities other than Low/Moderate Income Housing Benefit: 72 Persons Assisted
Housing First - Rent/Utilities/Deposit Assistance	2013	2017	Affordable Housing Homeless	Rapid City Corporate Limits	Housing First Assistance	CDBG: \$7,400	Tenant-based rental assistance / Rapid Rehousing: 9 Households Assisted
Homeless Prevention	2013	2017	Homeless	Rapid City Corporate Limits	Homeless Prevention	CDBG: \$7,400	Homelessness Prevention: 60 Persons Assisted
Mental Health Treatment and Services	2013	2017	Non-Homeless Special Needs	Rapid City Corporate Limits	Medical, Dental, Eye, & Medications Assistance	CDBG: \$39,903	Public service activities other than Low/Moderate Income Housing Benefit: 230 Persons Assisted
Emergency Shelter	2013	2017	Homeless	Rapid City Corporate Limits	Emergency Shelter	CDBG: \$5,000	Homeless Person Overnight Shelter: 100 Persons Assisted

Table 57 – Goals Summary

Estimate the number of extremely low-income, low-income, and moderate-income families to whom the jurisdiction will provide affordable housing as defined by HOME 91.215(b)

PROJECTS

AP-38 PROJECT SUMMARY

Project Summary Information

Project Name	Target Area	Goals Supported	Needs Addressed	Funding
City of Rapid City Neighborhood Restoration Loan Program	Rapid City Corporate Limits Census Tract 102 City Center Census Tract 103 - Silver St & N. Haines area Census Tract 104 Knollwood Area Census Tract 105 - E. North St to St. Pat Census Tract 106 Elm to Cambell & St. Pat to Fairmont	Acquisition for Housing Rehabilitation - Existing Housing Public Facilities Legal Assistance Counseling Services Housing First - Rent/Utilities/Deposit Assistance Homeless Prevention Mental Health Treatment and Services Emergency Shelter Rehabilitation - Existing Housing	CDBG Administration and Planning	CDBG: \$86,800
			Housing Rehabilitation Handicap Services and Modifications	CDBG: \$50,070

	Census Tract - 111 Sioux Park/Old Canyon Lake Census Tract 114 North of I90 Census Tract -107 Old Robbinsdale		Acquisition for Housing			
Rapid City Community Development Corporation	Rapid City Corporate Limits		Acquisition for Housing		Property Acquisition for Benefit of LMI Persons	CDBG: \$40,000
Teton Coalition, Inc.	Rapid City Corporate Limits		Acquisition for Housing		Property Acquisition for Benefit of LMI Persons Acquisition Cost Assistance for Homeownership	CDBG: \$40,000
Canyon Lake Senior Center	Rapid City Corporate Limits Census Tract - 111 Sioux Park/Old Canyon Lake		Public Facilities		Public Facilities - Senior Facilities	CDBG: \$15,000
Lutheran Social Services - Stepping Stones Program	Rapid City Corporate Limits Census Tract 102 City Center		Rehabilitation - Existing Housing		Public Facilities - Fire Sprinkler Systems	CDBG: \$35,000
Wellspring, Inc.	Rapid City Corporate Limits Census Tract - 111 Sioux Park/Old Canyon Lake		Public Facilities		Public Facilities - Energy Efficiency Improvements	CDBG: \$22,829
Western Resources for Disabled Independence	Rapid City Corporate Limits		Public Facilities		Public Facilities - General	CDBG: \$57,598
Youth and Family Services, Inc.	Rapid City Corporate Limits		Public Facilities		Public Facilities - Energy Efficiency Improvements	CDBG: \$15,000
Addiction Recovery Centers of the Black Hills	Rapid City Corporate Limits		Mental Health Treatment and Services		Substance Abuse Services Youth Programs and Services	CDBG: \$2,000
Behavior Management Systems	Rapid City Corporate Limits		Mental Health Treatment and Services		Medical, Dental, Eye, & Medications Assistance	CDBG: \$39,903
Dakota Plains Legal Services	Rapid City Corporate Limits		Legal Assistance		Legal Services	CDBG: \$5,000

The Salvation Army	Limits					
Volunteer of America, Dakotas	Rapid City Corporate Limits	Homeless Prevention	Housing First Assistance Homeless Prevention			CDBG: \$7,400
Working Against Violence, Inc.	Rapid City Corporate Limits	Housing First - Rent/Utilities/Deposit Assistance	Housing First Assistance			CDBG: \$7,400
Youth & Family Service - Counseling Center	Rapid City Corporate Limits	Emergency Shelter	Safe Haven Emergency Shelter			CDBG: \$5,000
	Rapid City Corporate Limits	Counseling Services	Counseling Services Youth Programs and Services			CDBG: \$5,000

Table 58 – Project Summary

AP-35 PROJECTS

Introduction

The following projects have been chosen because they meet a high priority need in the consolidated plan.

#	Project Name
1	Administration and Planning
2	City of Rapid City Neighborhood Restoration Loan Program
3	Rapid City Community Development Corporation
4	Teton Coalition, Inc.
5	Canyon Lake Senior Center
6	Lutheran Social Services - Stepping Stones Program
7	Wellspring, Inc.
8	Western Resources for Dis-Abled Independence
9	Youth and Family Services, Inc.
10	Addiction Recovery Centers of the Black Hills
11	Behavior Management Systems
12	Dakota Plains Legal Services
13	The Salvation Army
14	Volunteer of America, Dakotas
15	Working Against Violence, Inc.
16	Youth & Family Service - Counseling Center

Table 59 – Project Information

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

The top issues identified in the community needs assessment are lack of affordable housing units for persons whose incomes are below the poverty level, mental health and substance abuse treatment, transportation, cost burdens for housing costs, senior citizen needs, substandard housing and services for those with disabilities. These projects will serve those needs. Obstacles to addressing the underserved needs are the lack of livable wage jobs and lender tightened down payment buyer investments and credit underwriting for homebuyers.

AP-50 GEOGRAPHIC DISTRIBUTION

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

Funding for Public Services will service low-income people in all areas of town, within the corporate limits.

Public Facilities funded for rehab projects are located in CT 111 and CT 102, but serve low income clients from all areas of town, within the corporate limits.

Housing projects will serve low income residents with properties acquired anywhere available within the corporate limits.

Housing Rehabilitation projects will assist low income homeowners in any area of town.

Geographic Distribution

Target Area	Percentage of Funds
Rapid City Corporate Limits	100
Census Tract 102 City Center	
Census Tract 103 - Silver St & N. Haines area	
Census Tract 104 Knollwood Area	
Census Tract 105 - E. North St to St. Pat	
Census Tract 106 Elm to Cambell & St. Pat to Fairmont	
Census Tract - 111 Sioux Park/Old Canyon Lake	
Census Tract 114 North of I90	
Census Tract -107 Old Robbinsdale	

Table 60 - Geographic Distribution

Rationale for the priorities for allocating investments geographically

Housing for low income people is distributed City-wide.

No projects were brought forward for FY 2013 targeting any specific low-income Target Area, therefore funds have not been specifically targeted to any one target area, however 100% of the funds are targeted to benefit limited clientele who are extremely low-, very low-, low- and moderate-income people.

Discussion

AFFORDABLE HOUSING

AP-55 AFFORDABLE HOUSING

Introduction

One Year Goals for the Number of Households to be Supported	
Homeless	219
Non-Homeless	2,047
Special-Needs	1,850
Total	4,116

Table 61 - One Year Goals for Affordable Housing by Support Requirement

One Year Goals for the Number of Households Supported Through	
Rental Assistance	69
The Production of New Units	1
Rehab of Existing Units	13
Acquisition of Existing Units	6
Total	89

Table 62 - One Year Goals for Affordable Housing by Support Type

Discussion

Introduction

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

PCHRC will investigate the possibility of selling some scattered site, single family homes and leveraging the proceeds to develop additional under a mixed finance development.

Expand the supply of assisted housing by applying for additional units of Tenant Based Assistance, including those targeting specific clientele; acquire land for future development; and acquire or build additional units.

Improve the quality of assisted housing

Increase assisted housing choices through outreach efforts to potential voucher landlords; maintain site-based waiting lists for Public Housing; and allow incentive transfers for Public Housing residents.

Provide improved living environment through crime prevention activities, including additional police patrols and community policing efforts in Public Housing developments; work with local law enforcement agencies to provide for the exchange of information to aid in applicant screening, lease enforcement, and local law enforcement efforts; and develop a comprehensive Disaster Plan for all PCHRC properties.

Ensure equal opportunity and affirmatively further fair housing by providing staff with adequate training in the areas of Equal Opportunity, Fair Housing and Reasonable Accommodations; and modernize public housing projects to fully comply with Section 504 Accessibility Standards.

Enhance the image of Public Housing in our community by maintaining all units to standards that meet the surrounding neighborhood and responding to all complaints or concerns from local government or the citizens of our community within 48 hours.

Increase energy efficiency in Public Housing units by implementing energy saving projects in Public Housing properties.

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

The PCHRC has established a Resident Advisory Panel made up of residents from the various programs and developments. Appointments are made by the PCHRC Board of Commissioners. The Panel meets with the Executive Director and staff on a monthly basis to provide input on issues with their respective housing areas. Input is sought on all aspects of PCHRC operations. A representative of the Panel attends PCHRC Board meetings.

The PCHRC does not operate a homeownership program.

If the PHA is designated as troubled, describe the manner in which financial

assistance will be provided or other assistance

N/A

Discussion

Introduction

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

Street outreach is provided by many organizations in the community who come in contact with the homeless, such as Community Health, Western SD Community Action, and the HOPE Center, and referrals are made to the appropriate agencies. The Community now has a Homeless day drop-in center, the HOPE Center, where homeless are provided assistance, services and referrals to other agencies. They are privately funded at this time.

Addressing the emergency shelter and transitional housing needs of homeless persons

Emergency shelter needs of the homeless:

CDBG funding

\$5,000 – Working Against Violence, Inc. (WAVI) will use funding to provide shelter and supportive services to women and children experiencing domestic violence. Case management is provided to people staying at the shelter. Funding will provide assistance to 100 Very Low-Income women and children.

Funding from the City Community Investment General Funds will be provided as follows:

City General Funds

\$30,000 – WAVI will use general funds to provide shelter and supportive services. Funding will help approximately 500 Very Low-Income women and children.

\$10,000 – Cornerstone Rescue Mission will use funding to assist homeless women and children at the Women and Children's Home. Case management is provided to the residents staying at the home. Funding will help approximately 285 Very Low-Income women and children.

CDBG funding addressing transitional housing needs:

\$35,000 – Lutheran Social Services' Stepping Stones Program will use funding for installation of a centralized alarm and fire suppression system for the safety of the homeless youth living in the eight (8) apartments of the transitional housing program. Funding will benefit 8 apartments housing 16 youth at a time. Total to benefit over one year is estimated at 50 Very Low-Income youth.

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

Rapid City has adopted the Housing First model for moving homeless quickly to transitional or permanent housing and to prevent homelessness.

CDBG funding:

\$7,400 – Volunteers of America, South Dakota, will use the funding to provide rent, utility and deposit assistance to homeless people to access transitional or permanent housing. Funding may also be used to pay delinquent rent or utilities to prevent eviction. Funding will help 9 people, estimated 3 Very Low-Income and 6 Low-Income;

\$7,400 – Salvation Army will provide assistance for utility bills, deposits or delinquent accounts for accessing housing or preventing eviction. Funding will help 60 people, estimated to be 20 Very Low-Income, 20 Low-Income and 20 Moderate-Income.

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

CDBG funds:

The City has no CDBG funded projects specifically for homeless being discharged from publicly funded institutions and systems of care for FY 2013, however, other agencies address homeless issues with other funding sources:

Second Chance Act Grant (SCA) Funds: The Offender reentry program receives funding from the SD Department of Corrections SCA Grant to provide assistance to offenders from state prisons to secure transitional and permanent housing.

County/Private Funding

Pennington County Health and Human Services has two programs providing assistance to help homeless people discharged from jail and other institutions:

Rebound Program, provides assistance for housing, utilities and other needed services for persons discharged from the jail.

New Start Program provides housing and supportive services for the homeless, including those discharged from publicly funded institutions.

Housing

\$50,070–Neighborhood Restoration Loan Program will use funding for rehabilitation of substandard homes, including mobile homes. Provide assistance to 7 Very Low- Income households with grant funds.

\$58,000–Program Income will be used to fund Neighborhood Restoration Loan Program rehabilitation projects for an additional 6 Low-Income homeowners.

\$40,000–Rapid City Community Development Corporation will use funding for acquisition of property for new construction, or rehabilitation, or down payment and closing cost assistance for up to 4 Moderate-Income households.

\$40,000–Teton Coalition, Inc. will use funding for Lot purchase and Down Payment and Closing Cost assistance for homebuyers. The funding will provide assistance to 1 Very Low-Income household with lot purchase and 2 Moderate-Income households.

Discussion

Health

\$39,903–Behavior Management Systems Medications Program funding provides a staff person to apply to pharmaceutical companies for free drugs for homeless and other persons with severe, persistent mental illness. Funding will assist 230 people, 170 Very Low-, 54 Low-, and 6 Moderate- Income.

Social services

\$5,000–Dakota Plains Legal Services provides civil legal assistance to low income, homeless, victims of domestic violence, elderly, illiterate, and migrant farm workers. Funding will assist 15 people, 5 Very Low- and 10 Low- Income.

\$57,598–Western Resources for dis-Abled Independence (Public Facility – Land Acquisition) provides services, assistance and advocacy to persons with disabilities. Funding will be used to purchase land for a new facility that will provide more space and a training center. The new building will benefit 220 clients, 70 Very Low, 90 Low-, and 60 Moderate-Income.

\$15,000–Canyon Lake Seniors Center (Public Facility energy efficiency project) provides recreational programming, meals, seminars, and exercise room, and other services to the senior citizens. The rehab project will install programmable thermostats to provide consistent temperatures and automatic lowering of temperatures when the facility is not in use, reducing overall energy costs. Additionally, new electrical outlets will be installed to eliminate extension cords for improved safety. The improvements will benefit 1,400 Low-Income senior citizens.

Employment

No projects funded for FY 2013

Education

No projects funded for FY 2013

Youth needs

\$2,000–Addiction Recovery Centers of the Black Hills provides intensive outpatient treatment program for adolescents in the North Rapid Area. Funding will pay for hiring a staff family program specialist and tech to facilitate a monthly family recreational, social, and clinical activity day including psycho-educational group activities designed to increase communication between youth in recovery and their families. *This activity also serves the needs and goals for Health, Substance Abuse treatment.* Program will serve 20 youth, 10 Very Low-Income and 10 Low-Income households.

\$22,829–Wellspring (Public Facility energy efficiency project) provides programs and counseling for youth who have been abused and neglected. The project will replace 2 obsolete furnaces with new 95% efficient units and windows in the Outpatient Services building that houses the Soaring Eagle Chemical Dependency Treatment Program and Youth Challenge After School Program. 50 unduplicated youth clients from Very Low-Income families will benefit from the energy efficiency project,

Introduction

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

No barriers from public policies were identified.

Discussion

AP-85 OTHER ACTIONS

Introduction

Actions planned to address obstacles to meeting underserved needs

The City will work with local agencies to develop plans for meeting underserved needs and will focus funding on those needs.

Actions planned to foster and maintain affordable housing

The City has an Affordable Housing Task Force that is working with local social service agencies and housing agencies to develop a collaborative program with private developers to address affordable housing projects. They are seeking funding for a Housing Coordinator position that will become the catalyst and coordinator of housing projects to address the high priority needs.

The Substandard Housing Task Force is working with City departments and a City attorney to identify and prioritize substandard properties and will pursue compliance or demolition in order to eliminate the blighted properties. The task force will also work with local housing agencies when possible for the redevelopment of the property for affordable housing.

The City will require that properties purchased with CDBG funds, that are not already committed to a buyer be placed into the Dakota Land Trust, to provide permanent affordability for future low-income homebuyers.

Actions planned to reduce lead-based paint hazards

The City provides a housing rehabilitation program to home owners meeting the income guidelines that may be used to address lead-based paint hazards, within the funding limits of the program. The program requires contractors to adhere to lead-safe practices on all projects that will disturb lead paint, and lead testing is conducted on all homes built prior to 1978 where paint will be disturbed in excess of program guidelines.

Western South Dakota Community Action sponsors contractor training classes locally for lead-paint certifications and continuing education.

Actions planned to reduce the number of poverty-level families

The City's Strengthening Families Task Force *Bank On Rapid City* committee was formed to develop asset building programs that will help families increase their earnings and assets. The Bank On Rapid City committee has implemented a program of outreach to the unbanked and under-banked to connect them to mainstream banking programs; they support the AARP and VITA free tax preparation sites, and two IDA programs helped people with home buying and increasing their education. The committee will continue to work on promoting more job training and retraining opportunities for low-income people.

Actions planned to develop institutional structure

The Non-Profit Support Network offers seminars and trainings for non-profit agency directors, boards, and staffs on topics that will strengthen agencies for long term survival, that include fundraising, program

development, bookkeeping, staffing, marketing, advertising, customer service, record keeping, tracking results, and "telling their story."

The Community Development Manager provides technical assistance to agencies on program development for addressing gaps in services, grant management and performance based results.

Overall, Rapid City is very fortunate to have a very strong collaborative core of agencies that work together on many levels to serve their joint clientele. We have a very strong institutional structure with participants from all levels of government and service providers.

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

The City, Pennington County Health and Human Services, and NeighborWorks Dakota Home Resources have been working on enhancing coordination between housing agencies, Cornerstone Rescue Mission, P.C. Health and Human Services, Behavior Management Systems, and private developers. The Mayor and City Council members are very supportive of more public/private partnerships and are helping facilitate discussions. We will continue to work together to meet the needs of the community.

Discussion

PROGRAM SPECIFIC REQUIREMENTS

AP-90 Program Specific Requirements

Introduction

The City received program income in the amount of \$70,000 from the sale of a city owned property, the Friendship House.

\$19,033.33 was allocated to FY 2012 projects leaving a balance of \$69,901.33 to be carried forward to FY 2013 along with entitlement funds remaining from FY 2010 in the amount of \$6,674.98 and \$4,982.81 from FY 2012. These Entitlement funds remain due to spending program income earned, per HUD regulations.

The total amount available and carried forward to FY 2013 = \$81,559.12.

The City tries to target all CDBG funds to persons making less than 80% of median income so we have a very high ratio for benefitted persons of low and moderate income.

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	81,559
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:	81,559

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. 97.00%