



City of Bismarck, North Dakota

2021

ANNUAL ACTION PLAN

Substantial Amendment

Community Development Department

221 North 5th Street

Bismarck, ND 58501

A “substantial change” to the Consolidated or an Annual Action Plan is defined by the City be: a) a change in the allocation priorities or goals identified in the Consolidated Plan; or b) a change in the method of distributing funds (i.e. application process, selection criteria for projects, etc.); or c) a proposed new project for the program year; or d) a change in the purpose, scope, location, or type of beneficiaries of a project to such an extent that it can no longer reasonably be construed as the activity reviewed by the public and approved by the City Commission. The City’s Citizen Participation Plan requires that whenever the City makes a substantial change to the Consolidated Plan or an Annual Action Plan, a public comment period and public hearing must be held.

The substantial amendment to the 2021 Annual Action Plan includes the following:

- Modification of Section AP-20 (Annual Goals and Objectives) to clarify the funding levels and goal outcome indicators for 2021;
- Modification of Section AP-38 (Project Summary) to:
 - AARC - remove a \$5,750 public service project that has been determined to be un-fundable under HUD regulations;
 - Burleigh County Housing Authority - increase the amount of funding from \$64,351 to \$74,941 for the demolition of 17 outdated rental units that will be replaced with 34 new rental units; and
 - Administration - correct the amount allocated to Planning and Administration, an increase of \$1,210.

Executive Summary

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

1. Introduction

All local and state governments that receive direct assistance from any of four major HUD programs—Community Development Block Grant (CDBG), HOME, Emergency Shelter Grant (ESG), or Housing Opportunities for Persons with AIDS (HOPWA)—are required to develop and implement a five-year Consolidated Plan. This effort incorporates strategic planning and citizen involvement to develop more effective programs and prioritize the use of HUD funds. A grantee must also submit an annual action plan and grant application that describes the activities that will be undertaken in a particular year to implement the overall Plan. The Annual Action Plan also provides a basis for assessing performance. The City will receive \$416,581 in CDBG funds for program year 2021.

The City of Bismarck receives direct funding from HUD in only one of the covered programs--CDBG. Accordingly, its annual action plan contains only a CDBG application and required data that is relevant to the Consolidated Plan. The 2021 Annual Action plan is the second year in the City's current five-year Consolidated Plan. It must be noted that the CDBG funds may be used only for activities that primarily benefit low and moderate-income (LMI) persons, eliminate conditions of slum and blight, or address an urgent community need. The three main objectives of CDBG program are to provide decent housing, create sustainable living environments, and develop economic opportunity.

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 following goals were established in the 2020-2024 Consolidated Plan for the City of Bismarck and will guide the 2021 Annual Action Plan.

Housing Goals

- Development or renovation of affordable rentals
- Promote special needs housing
- Support homeownership for LMI households

Homeless Goals

- Support facilities serving homeless individuals and households
- Assist development of additional homeless housing
- Provide for homeless service providers
- Allocate funds to prevent homelessness

Community Development Goals

- Support public service activities
- Improve the quality of public facilities
- Improve connectivity and access
- Planning and administration

3. Evaluation of past performance

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

As part of its annual process, the City's CDBG Advisory Committee reviews prior-year projects and the progress they have made toward meeting the goals in the Consolidated Plan. When this Committee reviews CDBG applications, this helps inform their ranking of projects and the prioritization of funds.

4. Summary of Citizen Participation Process and consultation process

Summary from citizen participation section of plan.

In developing the Consolidated Plan, the City of Bismarck utilized a process that considered the needs of low- and moderate-income, homeless and special needs populations in the community, regardless of whether the identified need is eligible for funding under the CDBG program. The intent of this approach is to not only guide how the City strategically invests its CDBG funds, but also other community-based efforts to increase the resiliency and stability of the community's most vulnerable residents.

A variety of public outreach and citizen participation was used to develop the Consolidated Plan and this Annual Action Plan. Citizen participation included notices of public hearings and program updates, advertisements, on-line information, and outreach/consultation with local organizations to obtain comments, suggestions for funding, and agency proposals. Hearings were held at the City-County Office Building, which is located in an LMI area and is accessible. In addition, all public notices provided information about additional assistance that was available for persons with a disability (eg. TTY number), language assistance (eg. Spanish phone number) and staff contact information. Technical assistance was offered to non-profit organizations, and emails and application information were sent to non-profits and other agencies who provide services to LMI households.

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.

No public comments were made on the 2021 Annual Action Plan at the public hearing or received via email or mail.

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

Not applicable.

7. Summary

As no comments were received during the public comment period, no changes were made to the Annual Action Plan.

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

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

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

Agency Role	Name	Department/Agency
CDBG Administrator	Bismarck	Community Development Department

Table 1 – Responsible Agencies

Narrative (optional)

Consolidated Plan Public Contact Information

Ben Ehreth, Community Development Director | Kim Lee, Planning Manager | Maureen Mungai, Planner/CDBG Program Administrator
City of Bismarck, 221 North 5th Street, PO Box 5503, Bismarck, ND 58506-5503
Phone: (701) 355-1840 | Fax: (701) 222-6450 | TDD: 711 | Email: planning@bismarcknd.gov

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

1. Introduction

Throughout the development of the 2020-2024 Consolidated Plan and this 2021 Annual Action Plan, the City of Bismarck consulted with a variety of outside agencies and service providers to help establish funding priorities and plan objectives for the next five years. The City consulted with the Burleigh County Housing Authority; local and regional homeless service providers; public and private agencies that provide housing, health and social services; broadband service providers; entities that address resiliency issues; interested parties; and Bismarck residents.

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

The City of Bismarck works closely with the Burleigh County Housing Authority, Community Action, Community Works and other local nonprofits and private developers. In continuing these relationships, the City of Bismarck will encourage more coordination among these entities. Involvement in the Missouri Valley Coalition for Homeless People (MVCHP) and in the development and implementation of the Ten Year Plan to End Long-Term Homelessness in 2008 and the *Home, Together: Bismarck-Mandan Plan to Prevent and End Homelessness* in 2019 continues to promote communication and coordination of services among the agencies working with homeless persons.

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 Continuum of Care process provides a forum for local agencies to communicate, identify needs and prioritize local needs. The MVCHP coordinates the local CoC process. The MVCHP provides local input into the CoC that is developed at the State level. Its regular meetings provide an opportunity to share information between members on a monthly basis and to coordinate activities. The City is an active member of this organization.

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 Bismarck does not receive ESG funds but is an active member of the MVCHP to promote awareness and communication.

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	BURLEIGH COUNTY HOUSING AUTHORITY
	Agency/Group/Organization Type	Housing PHA Other government - County
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Public Housing Needs Non-Homeless Special Needs Market Analysis Anti-poverty Strategy Lead-based Paint Strategy
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	The City works with the BCHA on an ongoing basis, particularly in the development/renovation of rental projects under the Housing Authority's jurisdiction.
2	Agency/Group/Organization	Missouri Valley Coalition for Homeless Persons
	Agency/Group/Organization Type	Services-homeless CoC Neighborhood Organization
	What section of the Plan was addressed by Consultation?	Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Homelessness Strategy

	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	This organization is the lead organization for the Continuum of Care process.
3	Agency/Group/Organization	Lewis & Clark Regional Devel. Council
	Agency/Group/Organization Type	Housing Regional organization Planning organization
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Market Analysis Lead-based Paint Strategy
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	The City consults and partners with this organization on an emergency rehab program for Bismarck.
4	Agency/Group/Organization	Abused Adult Resource Center
	Agency/Group/Organization Type	Services-Victims of Domestic Violence
	What section of the Plan was addressed by Consultation?	Homeless Needs - Families with children Homelessness Strategy
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	The City works with this agency on an ongoing basis (sub-recipient of CDBG) to develop facilities and services for victims of domestic violence
5	Agency/Group/Organization	SALVATION ARMY - BISMARCK
	Agency/Group/Organization Type	Services - Housing

	What section of the Plan was addressed by Consultation?	Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Strategy
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	This agency is contacted on issues concerning homeless prevention and changing local needs. They use CDBG funds to address this issue.
6	Agency/Group/Organization	Aid, Inc.
	Agency/Group/Organization Type	Services - Housing Services-homeless
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Homeless Needs - Families with children Homelessness Strategy Anti-poverty Strategy
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	AID, Inc. is consulted to obtain information on community trends, housing and anti-poverty strategies. This organization provides valuable information on local need.
7	Agency/Group/Organization	YOUTHWORKS
	Agency/Group/Organization Type	Services - Housing Services-Children Services-homeless
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Homelessness Needs - Unaccompanied youth Homelessness Strategy

	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	This agency is consulted to obtain local information on the need for services and facilities for at-risk youth and runaways. Moreover, they have provided leadership on local homeless issues for the local coalition.
8	Agency/Group/Organization	West Central Human Service Center
	Agency/Group/Organization Type	Services - Housing Services-Persons with Disabilities Services-homeless Other government - State Regional organization
	What section of the Plan was addressed by Consultation?	Homeless Needs - Chronically homeless
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	West Central provides information on the needs of chronically homeless persons with mental illness concerns. Information is used to develop priorities and projects.
9	Agency/Group/Organization	ND Division of Community Services
	Agency/Group/Organization Type	Housing Other government - State
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Homeless Needs - Families with children Homelessness Needs - Veterans Non-Homeless Special Needs

	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	The City consults with this state agency in order to gain info on statewide need and possible funding for local projects.
10	Agency/Group/Organization	DACOTAH FOUNDATION
	Agency/Group/Organization Type	Housing Services-Persons with Disabilities
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Non-Homeless Special Needs
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	The City consults with this agency to gain more knowledge about the needs of persons with serious mental illness. The City has had several projects to fund improvements to Dacotah Foundation facilities that provide housing & support services.
11	Agency/Group/Organization	High Plains Fair Housing Center
	Agency/Group/Organization Type	Service-Fair Housing
	What section of the Plan was addressed by Consultation?	Housing Need Assessment
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	The City consults with this agency to help it determine what the greatest Fair Housing concerns are in Bismarck. The City is working with this agency on outreach and education.
12	Agency/Group/Organization	Legal Services of North Dakota
	Agency/Group/Organization Type	Services - Housing
	What section of the Plan was addressed by Consultation?	Housing Need Assessment

	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Consultation with this agency has provided the City with information on local housing issues (legal) for LMI persons and is working with this agency to increase outreach to prevent homelessness.
13	Agency/Group/Organization	Burleigh County Council on Aging
	Agency/Group/Organization Type	Services-Elderly Persons Other government - County
	What section of the Plan was addressed by Consultation?	Non-Homeless Special Needs
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	The City consults with this agency to obtain information on the housing and service needs of elderly households. This dialogue has resulted in CDBG funding of facility improvements over the last few years.
14	Agency/Group/Organization	COMMUNITY ACTION PROG. REG VII
	Agency/Group/Organization Type	Housing Services - Housing Services-Elderly Persons Services-Persons with Disabilities Services-Persons with HIV/AIDS Services-homeless Regional organization
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Non-Homeless Special Needs Anti-poverty Strategy Lead-based Paint Strategy

	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Consultation with this agency provides vital information on housing needs of LMI households. This has resulted in CDBG funding for housing accessibility. This agency does have a housing accessibility program which provides data on needs of persons with disabilities.
15	Agency/Group/Organization	Missouri Slope Areawide United Way
	Agency/Group/Organization Type	Services-Children Services-Elderly Persons Services-Persons with Disabilities Services-homeless Services-Health Services-Education
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Homeless Needs - Chronically homeless Homelessness Strategy Anti-poverty Strategy
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Consultation with this agency is ongoing. They provide information on local needs and the ability of local nonprofits to provide services. They operate the main homeless shelter in the city and are a great source of information about the needs of this group.
16	Agency/Group/Organization	Native American Development Center
	Agency/Group/Organization Type	Services - Housing Services-Elderly Persons Services-homeless Services-Education
	What section of the Plan was addressed by Consultation?	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 City consults with this agency to obtain information on the housing and service needs of Native Americans. This dialogue has resulted in a plan for future CDBG funding applications.
17	Agency/Group/Organization	GREAT PLAINS FOOD BANK
	Agency/Group/Organization Type	Services-Health
	What section of the Plan was addressed by Consultation?	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 City consults with this agency on issues related to food insecurity.
18	Agency/Group/Organization	LUMEN
	Agency/Group/Organization Type	Services - Broadband Internet Service Providers
	What section of the Plan was addressed by Consultation?	Broadband and Internet Connection

	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	The City consulted with LUMEN about broadband and internet needs of the community and more specifically, those of low-to-moderate Income (LMI) households. The consultation also explored how the City can help bridge the digital divide and other challenges that LMI households were experiencing. Access to the internet is increasingly vital to everyday life. Particularly during the COVID-19 pandemic, with many schools, governmental and service provider offices closed, websites and social media are often the primary form of communication about available services and housing. Consultation was also done with LUMEN's competitor, Midco. Overall, both found that connection was good within the city, and the majority of Bismarck neighborhoods and blocks have access to one or more choices of broadband connection. The City will continue to explore areas of collaboration to bridge the needs of the LMI community.
19	Agency/Group/Organization	Bismarck Emergency Management Division
	Agency/Group/Organization Type	Agency - Emergency Management Other government - Local
	What section of the Plan was addressed by Consultation?	Climate Change Resilience

<p>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</p>	<p>This consultation looked at Bismarck's preparedness and ability to recover from natural disasters induced by climate change. The City has an existing multi-hazard plan that was prepared with community stakeholders to address prevalent natural threats in Bismarck. The City of Bismarck has several emergency notifications services, including a city-wide siren system; Rapid Damage Assessment (RDA) quickly identifies, monitors, and informs the public in case of an emergency. The consultation identified four vulnerabilities and how each was being addressed: drought, inland flooding, wildfire/grassfire and urban heat island effect. The Community Development Department will continue to coordinate with the Emergency Management Division to ensure the community and especially LMI households are aware and prepared.</p>
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Identify any Agency Types not consulted and provide rationale for not consulting

The City made every attempt to be inclusive in its outreach efforts and consultation activities. Economic development agencies were not consulted since no CDBG funding is awarded for this purpose.

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

Name of Plan	Lead Organization	How do the goals of your Strategic Plan overlap with the goals of each plan?
Continuum of Care	Missouri Valley Coalition for Homeless People	Bismarck's Consolidated Plan integrates the needs assessed b the statewide Continuum of Care and Region 7, which contains Bismarck.

Table 3 – Other local / regional / federal planning efforts

Narrative (optional)

The City works cooperatively with the North Dakota Department of Commerce and the North Dakota Housing Finance Agency to support affordable housing activities within our jurisdiction, primarily through the HOME and Low-Income Housing Tax Credit (LIHTC) Programs. Burleigh County typically defers to the City of Bismarck for implementation of programs/projects within city limits. The Burleigh County Housing Authority serves citizens of Bismarck and Burleigh County, and is a key player in the provision, preservation, and creation of affordable housing. At the municipal level, the City partners with the Bismarck Parks and Recreation District and Bismarck Public Schools on implementation of projects that benefit low-and moderate-income, special needs and homeless populations.

AP-12 Participation – 91.105, 91.200(c)

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

The City's adopted Citizen Participation Plan (CPP) guided the key elements of resident and stakeholder consultation for the development of the 2020-2024 Consolidated Plan and this 2021 Annual Action Plan. As directed in the CPP, citizen participation included consultation with the City's CDBG Advisory Committee, needs prioritization, and public meeting/ hearings. The comprehensive citizen participation process was designed to receive input from residents and stakeholders on Bismarck's housing, community development, and economic needs.

The City's CDBG Advisory Committee also assists with the identification of needs, setting priorities, and making funding recommendation for annual allocations of CDBG funding. The recommendations of the Advisory Committee are forwarded to City Commission, which has final local approval authority.

Meeting of the Bismarck City Commission are open to the public and are noticed on the City's website. Public hearings and public comment periods are advertised in the Bismarck Tribune and posted online. Notices are also sent to agencies that serve low- and moderate-income residents, residents with special needs and homeless residents, as well as to units of local government, including law enforcement, and agencies that provide youth programming. Notices include information for residents with Limited English Proficiency to request language assistance or reasonable accommodations for residents with disabilities.

The City of Bismarck held a 30-day comment period to receive comments on the 2021 Annual Action Plan in July-August 2021. During this time, the draft Annual Action Plan was available for public review, and residents and stakeholders could provide comments. The City also held a public meeting for applicants to discuss the recommended projects and a public hearing to receive input from residents and stakeholders. A summary of community outreach efforts is included in the table that follows.

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	Newspaper Ad	Minorities Non-English Speaking - Specify other language: Spanish Persons with disabilities Non-targeted/broad community	No comments received.	No comments received.	N/A	
2	Public Meeting	applicants/current subrecipients	No one attended and no one sent in or emailed written comments.	No comments received.	N/A	
3	Public Hearing	Non-targeted/broad community	No one attended and no one sent in or emailed written comments.	No comments received.	N/A	
4	Newspaper Ad	Non-targeted/broad community	No comments received.	No comments received.	N/A	

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)
5	Public Hearing	Non-targeted/broad community	No one attended and no one sent in or emailed written comments.	No comments received.	N/A	

Table 4 – Citizen Participation Outreach

Expected Resources

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

Introduction

The City of Bismarck will receive \$416,581 in CDBG funding for FY2021.

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	416,581	0	0	416,581	1,231,593	Funds allocated to Missouri Slope Areawide United Way (UW) not appropriated because of a choice limiting infringement. The City is in the process of an amendment which will make these funds available to other subrecipients with project needs.

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

If local matching funds are required, the City will use several different options. For instance, it can use its local sales tax revenue as match in economic development activities. In addition, tax increment financing and tax abatement are tools that the City may use as match or as a way to encourage development. The City also works with nonprofits, foundations, and financial institutions to try to develop additional resources, such as lower interest loans and grants.

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

Not applicable.

Discussion

The City uses a variety of resources to address the needs of the City and its residents. Since the City of Bismarck does not receive HOME or ESG funds directly from HUD, service providers within the City are eligible to apply for these funds from the North Dakota Department of Commerce - Division of Community Services and the North Dakota Housing Finance Agency. The following summary reflects all the resources available to the City of Bismarck during this Plan.

Infrastructure/capital improvements/public facilities: The City funds its capital improvements from a variety of sources including the following: city general fund, federal funds, state funds, revenue bonds, special assessments, sales tax, fees, mill levy, special funds, etc.

Economic Development/Downtown Revitalization: The City continues to work with Bismarck-Mandan Development Association (BMDA) to develop projects to encourage local economic growth. The following resources are available to BMDA for economic development:

- Special tax exemptions or reductions on corporate income, property taxes, and the use of tax increment financing.
- State funds for low interest loans for business expansion or relocation (e.g., MATCH Program, PACE fund), advanced technology, workforce training, etc.
- Local sales tax revenue of up to \$1.5 million to be used as match or as incentive financing (Vision Fund).
- Partnerships with local service providers/utilities.
- Federal resources such as EDA.

Shelters and programs for the homeless: The City will provide technical assistance and support Emergency Solutions Grant (ESGP) applications that local emergency shelters submit directly to the ND Division of Community Services. Local emergency shelters use ESG funds for operational expenses or rehabilitation of facilities. ESG funds awarded to nonprofit groups (varies from 4 to 7) in Bismarck have totaled from \$50,000 to \$100,000 over the past few years. Local providers continue to participate in the development of the statewide Continuum of Care (COC) The local housing authority and the Community Action Program continue to administer Shelter Plus Care programs.

The United Way continues to operate a homeless shelter for both individuals and families. Ministry on

the Margins continues to provide emergency housing and services to families. Both have experienced increases in numbers of clients in the past year. Local service providers continue to utilize Coordinated Assessments. The City continues to provide operational support for the local coalition to support services.

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	Development or renovation of affordable rentals	2020	2024	Affordable Housing		Affordable Rental Housing	CDBG: \$74,941	Buildings Demolished: 3 Buildings
3	Support homeownership for LMI households	2020	2024	Affordable Housing		Affordable Owner-occupied Housing	CDBG: \$20,000	Homeowner Housing Rehabilitated: 4 Household Housing Unit
7	Allocate funds to prevent homelessness	2020	2024	Homeless		Homeless Housing and Services	CDBG: \$51,500	Homelessness Prevention: 130 Persons Assisted
8	Support public service activities	2020	2024	Non-Housing Community Development		Improved Access to Public Services	CDBG: \$10,000	Public service activities other than Low/Moderate Income Housing Benefit: 150 Persons Assisted Public service activities for Low/Moderate Income Housing Benefit: 0 Households Assisted

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
9	Improve the quality of public facilities	2020	2024	Non-Housing Community Development		Improved Public Facilities	CDBG: \$176,824	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 16052 Persons Assisted
11	Planning and administration	2020	2024	Planning and Administration			CDBG: \$83,316	

Table 6 – Goals Summary

Goal Descriptions

1	Goal Name	Development or renovation of affordable rentals
	Goal Description	Proposed project for 2021 would provide funding to the Burleigh County Housing Authority to demolish 17 units of obsolete rental housing in three buildings. These 17 units will be replaced with 14 two-bedroom apartments, three of which will be fully accessible, and 20 one-bedroom units for elderly residents, eight of which will be set aside for homeless persons.
3	Goal Name	Support homeownership for LMI households
	Goal Description	Proposed project for 2021 would provide funding to Lewis and Clark Development Group, which assists LMI homeowners with emergency home repairs, such as furnaces and frozen water pipes.
7	Goal Name	Allocate funds to prevent homelessness
	Goal Description	Funding will be provided to AID Inc for its homeless prevention program, which provides funding for those at risk of homelessness in the form of emergency temporary assistance with past-due and current month's rent or utilities and security deposits. Funding will also be provided to Ministry on the Margins to provide emergency shelter at a local motel for those who are without other housing options.

8	Goal Name	Support public service activities
	Goal Description	UPspire ND will utilize 2021 funding for its Healthy Families Program, which provides support to families as they become parents.
9	Goal Name	Improve the quality of public facilities
	Goal Description	There are five projects identified for funding to support this goal in 2021. Bridging the Dental Gap plans to rebuild their reception area to create a more accessible design and install permanent flooring in their operatories, while the Great Plains Food Bank is also planning an accessibility project for their parking lot. The Bismarck Senior Center is rehabilitating their recreation room, while the Dream Center will be purchasing a walk-in freezer and cooler to support their programs. Youthworks, a facility serving at-risk youth and their families, is also planning an interior rehabilitation project.
11	Goal Name	Planning and administration
	Goal Description	Planning and administration of CDBG program.

Projects

AP-35 Projects – 91.220(d)

Introduction

All local and state governments that receive direct assistance from any of four major HUD programs—Community Development Block Grant (CDBG), HOME, Emergency Shelter Grant (ESG), or Housing Opportunities for Persons with AIDS (HOPWA)—are required to develop and implement a five-year Consolidated Plan. This effort incorporates strategic planning and citizen involvement to develop more effective programs and prioritize the use of HUD funds. A grantee must also submit an annual action plan and grant application that describes the activities that will be undertaken in a particular year to implement the overall Plan. The Annual Action Plan also provides a basis for assessing performance. The City will receive \$416,581 in CDBG funds for program year 2021.

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The following is a listing of activities that the City will undertake during the next year to utilize CDBG funds:

Projects

#	Project Name
1	BCHA Dakota Apartments II
2	Lewis and Clark Emergency Homeowner Repairs
3	AID Homelessness Prevention
4	Ministry On The Margins - Emergency Sheltering
5	USpire Healthy Families Program
6	Bridging the Dental Gap Reception Area/Flooring
7	The Dream Center
8	Seniors Center Recreation Room Rehabilitation
9	Great Plains Food Bank Accessibility Improvements
10	Youthworks Interior Rehabilitation
11	2021 Administration

Table 7 - Project Information

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

The designated projects all meet the Priority Needs outlined in the 2020-2024 Consolidated Plan. The Priority Needs identified in the Consolidated Plan include affordable rental housing, homeless housing and services, special needs housing, improve access to public services, affordable owner-occupied housing, improve public facilities and public improvements/infrastructure. The projects selected for the upcoming program year address the priority needs identified in the Consolidated Plan through a variety of means. Projects were selected based on the ability to meet needs of LMI households in the City of Bismarck and the capacity of each entity to fulfill their objectives. The City has allocated \$83,316 for administration.

AP-38 Project Summary
Project Summary Information

1	Project Name	BCHA Dakota Apartments II
	Target Area	Citywide
	Goals Supported	Development or renovation of affordable rentals
	Needs Addressed	Affordable Rental Housing
	Funding	CDBG: \$74,941
	Description	Burleigh County Housing Authority is planning to demolish 17 units of obsolete rental housing in three building and replace them with 14 2-bedroom units, 3 of which will be ADA accessible. Another 20 1-bedroom units for the elderly will also be constructed, 8 of which will be set aside for the homeless. CDBG funds will be used for the demolition of three buildings.
	Target Date	5/31/2022
	Estimate the number and type of families that will benefit from the proposed activities	34 LMI households will ultimately benefit from the replacement of the obsolete units
	Location Description	410 S 2nd Street, Bismarck ND
	Planned Activities	BCHA plans to demolish 17 units of obsolete 2-bedroom rental units in three buildings, which will be replaced with 14 2-bedroom units, 3 of which will be ADA accessible, and 20 1-bedroom units for elderly residents. CDBG funds will be used for the demolition of the three buildings/17 units of obsolete housing.
2	Project Name	Lewis and Clark Emergency Homeowner Repairs
	Target Area	Citywide
	Goals Supported	Support homeownership for LMI households
	Needs Addressed	Affordable Owner-occupied Housing
	Funding	CDBG: \$20,000
	Description	CDBG funds are proposed for emergency repairs such as frozen pipes, furnace repairs, and water heaters as needed when the homeowner does not have the funds to pay for these much needed repairs. Funds are reserved for Bismarck residents only.
	Target Date	5/31/2022

	Estimate the number and type of families that will benefit from the proposed activities	4 LMI homeowners requiring emergency home repairs.
	Location Description	Citywide
	Planned Activities	CDBG funds are proposed for emergency repairs such as frozen pipes, furnace repairs, and water heaters as needed when the homeowner does not have the funds to pay for these much needed repairs. Funds are reserved for Bismarck residents only.
3	Project Name	AID Homelessness Prevention
	Target Area	Citywide
	Goals Supported	Allocate funds to prevent homelessness
	Needs Addressed	Homeless Housing and Services
	Funding	CDBG: \$25,000
	Description	AID Inc will use CDBG funds to provide emergency temporary assistance to LMI individuals and families who are at risk of homelessness with past-due and current month's rent or utilities and security deposits.
	Target Date	5/31/2022
	Estimate the number and type of families that will benefit from the proposed activities	50 LMI persons facing homeless due to evictions or inability to raise a security deposit will benefit from this activity.
	Location Description	City-wide
Planned Activities	AID Inc will use CDBG funds to provide emergency temporary assistance to LMI individuals and families who are at risk of becoming homeless to assist with past-due and current month's rent or utilities and security deposits.	
4	Project Name	Ministry On The Margins - Emergency Sheltering
	Target Area	Citywide
	Goals Supported	Allocate funds to prevent homelessness
	Needs Addressed	Homeless Housing and Services
	Funding	CDBG: \$26,500

	Description	CDBG funds would be used to provide emergency sheltering at a local motel for those who are without other housing options. Those utilizing this service include men and women with felony backgrounds unable to utilize our local shelter, those waiting for admission to a treatment program, families on the waiting list for our local family shelter, and those released from the hospital and in need of a few days of stabilization.
	Target Date	5/31/2022
	Estimate the number and type of families that will benefit from the proposed activities	80 homeless LMI residents will be served.
	Location Description	201 N 24th St, Bismarck, ND
	Planned Activities	CDBG funds would be used to provide emergency sheltering at a local motel for those who are without other housing options. Those utilizing this service include men and women with felony backgrounds unable to utilize our local shelter, those waiting for admission to a treatment program, families on the waiting list for our local family shelter, and those released from the hospital and in need of a few days of stabilization.
5	Project Name	USpire Healthy Families Program
	Target Area	Citywide
	Goals Supported	Support public service activities
	Needs Addressed	Improved Access to Public Services
	Funding	CDBG: \$10,000
	Description	Healthy Families is a free visitation program designed to support families as they become parents. It is specifically designed to support parents who may have histories of childhood trauma, intimate partner violence, poor mental health, and/or substance abuse issues. USpire plans on using CDBG funds for the Bismarck Healthy Families Program to support staff salary, which will ensure the continued focus on supporting enrolled families' financial capabilities (setting budgets, exploring opportunities to reduce debt and remove financial stressors from the home environment).
	Target Date	5/31/2022

	Estimate the number and type of families that will benefit from the proposed activities	150 LMI persons
	Location Description	City-wide
	Planned Activities	Healthy Families is a free visitation program designed to support families as they become parents. It is specifically designed to support parents who may have histories of childhood trauma, intimate partner violence, poor mental health, and/or substance abuse issues. Uspire plans on using CDBG funds for the Bismarck Healthy Families Program to support staff salary, which will ensure the continued focus on supporting enrolled families' financial capabilities (setting budgets, exploring opportunities to reduce debt and remove financial stressors from the home environment).
6	Project Name	Bridging the Dental Gap Reception Area/Flooring
	Target Area	
	Goals Supported	Improve the quality of public facilities
	Needs Addressed	Improved Public Facilities
	Funding	CDBG: \$57,124
	Description	CDBG funds will be used to rebuild the front reception area in a way that is more accessible to disabled clientele and install new permanent flooring in the operatories.
	Target Date	5/31/2022
	Estimate the number and type of families that will benefit from the proposed activities	3640 LMI persons.
	Location Description	1223 S 12th Street, Suite 1, Bismarck, ND
	Planned Activities	CDBG funds will be used to rebuild the front reception area in a way that is more accessible to disabled clientele and install new permanent flooring in the operatories.
7	Project Name	The Dream Center
	Target Area	
	Goals Supported	Improve the quality of public facilities
	Needs Addressed	Improved Public Facilities

	Funding	CDBG: \$35,000
	Description	CDBG funds will be used to install a walk-in freezer and a walk-in cooler for their food pantry program and meal program that benefit LMI persons and households
	Target Date	5/31/2022
	Estimate the number and type of families that will benefit from the proposed activities	500 LMI individuals.
	Location Description	1805 Park Avenue, Bismarck, ND
	Planned Activities	CDBG funds will be used to install a walk-in freezer and a walk-in cooler for their food pantry and meal programs.
8	Project Name	Seniors Center Recreation Room Rehabilitation
	Target Area	
	Goals Supported	Improve the quality of public facilities
	Needs Addressed	Improved Public Facilities
	Funding	CDBG: \$33,000
	Description	CDBG funds will be used to rehabilitate the recreation room at the Burleigh County Senior Center. Work will include wall repairs, retexturing and painting, replacement of the double door into the breakroom, and replacement of ceiling tiles. We will continue to work with them to ensure that all funded activities are rehabilitation rather than maintenance and are eligible for CDBG funding.
	Target Date	5/31/2022
	Estimate the number and type of families that will benefit from the proposed activities	1700 LMI seniors
	Location Description	315 North 20th Street, Bismarck ND
	Planned Activities	CCDBG funds will be used to rehabilitate the recreation room at the Burleigh County Senior Center. Work will include wall repairs, retexturing and painting, replacement of the double door into the breakroom, and replacement of ceiling tiles.
	Project Name	Great Plains Food Bank Accessibility Improvements

9	Target Area	
	Goals Supported	Improve the quality of public facilities
	Needs Addressed	Improved Public Facilities
	Funding	CDBG: \$30,000
	Description	CDBG funds will be used for accessibility improvements to the route from the food bank parking lot to the building, funding items such as curb cuts, ramps, and drainage correction. The project will also include the installation of doors that improve accessibility.
	Target Date	5/31/2022
	Estimate the number and type of families that will benefit from the proposed activities	9822 LMI individuals in the area
	Location Description	1315 S 20th Street, Bismarck, ND
	Planned Activities	CDBG funds will be used for accessibility improvements to the route from the food bank parking lot to the building, funding items such as curb cuts, ramps, and drainage correction.
10	Project Name	Youthworks Interior Rehabilitation
	Target Area	
	Goals Supported	Improve the quality of public facilities
	Needs Addressed	Improved Public Facilities
	Funding	CDBG: \$21,700
	Description	CDBG funds will be used for rehabilitation of the building interior including flooring replacement, door upgrades and improvements to a storage area. We will continue to work with them to ensure that all funded activities are rehabilitation rather than maintenance and are eligible for CDBG funding.
	Target Date	5/31/2022
	Estimate the number and type of families that will benefit from the proposed activities	390 LMI at-risk youth and their parents.
	Location Description	217 West Rosser Avenue, Bismarck ND

	Planned Activities	CDBG funds will be used for rehabilitation of the building interior including flooring replacement, door upgrades and improvements to a storage area.
11	Project Name	2021 Administration
	Target Area	
	Goals Supported	Planning and administration
	Needs Addressed	
	Funding	CDBG: \$83,316
	Description	Planning and administration
	Target Date	5/31/2022
	Estimate the number and type of families that will benefit from the proposed activities	
	Location Description	
	Planned Activities	Planning and administration of CDBG program.

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

Projects selected for FY 2021 are not limited to LMI areas within the City, but serve LMI residents.

Geographic Distribution

Target Area	Percentage of Funds
Citywide	100

Table 8 - Geographic Distribution

Rationale for the priorities for allocating investments geographically

Not applicable

Discussion

Affordable Housing

AP-55 Affordable Housing – 91.220(g)

Introduction

While the City of Bismarck supports affordable housing within the community, no affordable housing as defined by HOME 91.315(b)(2) will be provided with CDBG funding in FY2021.

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

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	0
Acquisition of Existing Units	0
Total	0

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

Discussion

AP-60 Public Housing – 91.220(h)

Introduction

The Burleigh County Housing Authority manages the public housing units located in the City of Bismarck.

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

One project selected for FY 2021 will benefit Burleigh County Housing Authority through demolition of three buildings containing 17 obsolete units, which will make room for the construction of 14 two-bedroom units, including three ADA access units. The BCHA will also be constructing special needs housing in the form of 20 one-bedroom units for elderly residents, including four that are ADA accessible and eight units that will be set aside for homeless persons.

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

The Housing Authority will continue to offer its homeownership program. This program annually provides an opportunity for one to three interested tenants residing in public housing to purchase the single-family dwelling which they rent. However, escalating home prices in Bismarck have resulted in higher appraised values for these units, and the purchase price is currently too high for an LMI household even with a soft second.

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

PHA has not been designated as troubled.

Discussion

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

Introduction

Activities that will benefit homeless persons and prevent homelessness were identified as a priority need in the 2020-2024 Consolidated Plan. CDBG funding will be used for public services that provide emergency assistance and homeless prevention. Funds will also be used to make improvements to two shelter facilities in the community.

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

Bismarck participates in a statewide Continuum of Care and several local agencies receive funding through that process. It also serves as a clearinghouse for statewide information on homeless data and resources, identifies gaps in services, and provides leadership in strategic planning. The local coalition provides education/outreach, services, and a means for local agencies to communicate and cooperate. It also coordinates the annual point-in-time surveys. The City will continue to work with the local coalition and is providing CDBG assistance for homelessness prevention to at risk-households and emergency services for homeless households. Local service agencies have received training on a coordinated assessment process in order to identify homeless households with the greatest needs. Several emergency housing assistance activities for at risk households within the City are being funded this year.

Addressing the emergency shelter and transitional housing needs of homeless persons

Within the City of Bismarck, there are numerous homeless service agencies that provide support to homeless households. Several projects, described in more detail below, will assist in limiting the number of households entering homelessness by providing emergency housing assistance.

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

There are several projects for 2021 that include offering emergency housing assistance such as rent, utilities, and other emergency housing assistance to help prevent households from entering homelessness. This includes AID, Inc. that will serve an estimated 50 households with emergency housing assistance. Ministry on the Margins will also provide funds for emergency housing assistance to

persons unable to access emergency shelter at other facilities.

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.

As noted above, there are two projects that will help households avoid homelessness by offering emergency housing assistance. All of these projects will have funds available to households that are at risk of becoming homeless and will be available to persons exiting systems of care.

Discussion

As the City of Bismarck continues to strive to reduce homelessness, the City will fund projects that serve the homeless and at risk population.

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

Introduction:

The Barriers to Affordable Housing were noted in MA-40 of the 2020-2024 Consolidated Plan. The most highly rated barriers to affordable housing were the cost of land or lot, cost of labor and cost of materials.

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

Most of the barriers to affordable housing that were cited in the Consolidated Plan are outside the control of the City, such as cost of land and labor. However, the City will continue to encourage non-profit and private developers to apply for CDBG and HOME funding (via the State). It will also provide support to these entities to apply to the State for HIF funding or to obtain Low Income Housing Tax Credits (LIHTC).

The City of Bismarck has recently completed ordinance changes which will have an impact on housing affordability within the community. The changes include an updated parking ordinance (which reduced parking requirements) and reduced right-of-way and roadway widths for roadways in residential neighborhoods. Both of these actions are intended to allow more developable space for housing and in turn potentially lessening the input costs for development. Additionally, the City of Bismarck is currently undertaking an update to its comprehensive plan titled *Together 2045*, and impacts of public policy, such as zoning and subdivision regulations, will be evaluated for their impact on housing affordability.

Discussion:

Some barriers to affordable housing in the City of Bismarck are out of the reach of the City, including the cost of land, labor and materials. The City can, however, continue to make it feasible for developers to develop affordable housing units within the City. The City will continue its partnership with local nonprofits, and private developers to promote affordable housing.

In accordance with the applicable statutes and regulations governing the Consolidated Plan, the City of Bismarck certifies that they will affirmatively further fair housing. The City of Bismarck adopted an Analysis of Impediments to Fair Housing Choice in 2015 and will be conducting an update to this document in the future. The City of Bismarck will take appropriate actions to overcome the effects of any impediments identified through that analysis, and maintain records reflecting that analysis and actions in this regard.

AP-85 Other Actions – 91.220(k)

Introduction:

The following narrative describes additional actions that the City of Bismarck will undertake during this plan year.

Actions planned to address obstacles to meeting underserved needs

The City has found that the largest obstacle to meeting underserved needs is the lack of resources. While the City has no control over the amount of resources it will receive, the City will allocate what funds it does have to try to meet the priority needs identified in the Consolidated Plan. The City has also allocated a large share of its CDBG public service funds to emergency housing assistance needs since this has been one of the greatest priority needs, due to a shortage of affordable housing and facilities to serve homeless or potentially homeless persons.

Actions planned to foster and maintain affordable housing

During the 2021 program year, the City will continue to use CDBG funding for LMI households to improve accessibility and do emergency repairs. These activities will help maintain affordability for LMI households. The Community Development Department, through its Planning Division, continues to conduct research and identify ways to reduce costs in the development of new housing.

Actions planned to reduce lead-based paint hazards

The City will continue to provide information on requirements and training to project owners and contractors working on CDBG funded activities. The State Health Department provides technical assistance for these projects upon request or referral by the City.

Actions planned to reduce the number of poverty-level families

The City of Bismarck will continue to support the Bismarck-Mandan Chamber/EDC and local economic development projects with local sales tax revenue and other means, but will not use CDBG funds to fund economic development. The City will encourage reinvestment in the downtown through its participation in the Renaissance Zone Program. The City will also continue to work with the Downtown Business Association on revitalization and economic development efforts in the core of the community.

The Housing Authority will continue to operate its self-sufficiency program, and Community Action Council will continue its self-reliance activities. Both programs help low income families escape poverty. Operational support, facility renovation, and improved accessibility will aid these efforts. The City will also use CDBG to support activities that encourage self-sufficiency, job training, supportive services, etc. These efforts will help the City to address poverty issues primarily through supportive services that

encourage self-sufficiency.

Actions planned to develop institutional structure

The City will implement no new actions to develop its institutional structure. The City will continue to work and communicate with the Burleigh County Housing Authority, adjacent units of government, local nonprofits, and social service agencies.

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

No new actions are planned for FY2021 to enhance coordination between public and private housing and social service agencies; however, every effort will be made to encourage communication and awareness of programs and activities.

Discussion:

During the 2021 program year, the City of Bismarck will continue direct funding to help meet the needs of LMI residents of the City. One hundred percent of CDBG activity funds will be allocated to activities benefitting LMI persons. These efforts, along with activities implemented by other public and private agencies, will help to address the priority needs identified in the 2020-2024 Consolidated Plan.

Program Specific Requirements

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

Introduction:

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.

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%