

ANNUAL ACTION PLAN Program Year 2024



Executive Summary

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

1. Introduction

Pocatello, Idaho receives an annual entitlement allocation from the U.S. Department of Housing and Urban Development's (HUD) Community Development Block Grant (CDBG) program. The Consolidated Plan provides direction on the investment of CDBG dollars over five years, from Program Years 2022 through 2026. Additionally, each year, the City produces an Annual Action Plan that details how it will carry out the goals and objectives identified in the Consolidated Plan.

The Annual Action Plan (AAP) describes funding and projects in Program Year 2024 (PY24) and provides a more specific look into how the program will operate. Consistent with HUD's mission, the City works to increase homeownership, support community development, and increase access to affordable housing free from discrimination. The City will embrace a high standard of ethics, management, and accountability in undertaking this work. The City will continue to form new partnerships that leverage resources and improve HUD's effectiveness at the community level.

The PY24 AAP serves as year three of the 2022-2026 Consolidated Plan. The PY24 AAP includes projects that will address the priority needs identified in the Consolidated Plan which include:

- Provide decent housing
- Create a suitable living environment
- Expand opportunities for Low- and Moderate-Income (LMI) Persons

To address these priority needs, the PY24 AAP includes the goals of: housing, public facilities, public infrastructure, public services, and planning and administration. The City used the Consolidated Plan as well as public feedback and comments received through the Citizen Participation process to determine funding allocations toward these goals and subsequent projects.

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.

As further articulated in section AP-20, the objectives and outcomes are identified in the Plan (see attached table) and include the following:

- Public Facilities
- Public Infrastructure
- Public Services
- Housing
- Planning and Administration

During the 2022-2026 Consolidated Plan period, the City of Pocatello selected projects to support affordable housing for low- to moderate income residents. This includes the City's Lead Safe and Healthy Homes (LSHH) program and the RENEWAL property rehabilitation grant and loan program. In PY24 those activities will assist an estimated 56 low- and moderate-income residents as follows:

- Homeowner housing rehabilitated through LSHH and RENEWAL 52
- Rental Units Rehabilitated through LSHH 4

Other programs will help support low- and moderate-income residents to remain housed or transition into affordable housing:

- Homeless overnight shelter 335 persons assisted
- Public Facilities and Infrastructure projects 2,346 persons assisted
- Public services 983 persons assisted

Goal Name	Category	Activities	Objectives
1. Public Facilities	Homeless, non-homeless	Homeless person overnight	Assist 335 clients
and Improvements	special needs, non-housing	shelter partial acquisition	
	community development		
2. Public	Non-housing community	ADA and Mobility	Complete repairs in
Infrastructure	development	improvements through	census tracts with
		Sidewalk repair,	appx 2,346 clients
		replacement	
3. Public Services	Non-homeless special needs,	Citywide eligible services for	Assist 983 clients
	non-housing community	LMI populations	
	development, homeless needs		
4. Housing	Affordable housing	Homeowner housing	Rehab appx. 56 units
		rehabilitation	

5. Planning and	All categories	Various planning and	
Administration		administration activities	
		including fair housing	

Table 1 - Annual Goals and Objectives

3. Evaluation of past performance

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

Each year, Pocatello reports its progress in meeting the five-year and annual goals in the Consolidated Annual Performance Evaluation Report (CAPER). The CAPER is submitted to HUD within 90 days after the start of each new program year. In addition, the City reviews the past performance of Subrecipients/partnering agencies to determine if the proposed projects will help meet the goals of the Con Plan. This information is used to inform the recommendation for funding that is presented to City Council for approval.

4. Summary of Citizen Participation Process and consultation process

Summary from citizen participation section of plan.

Citizen participation includes actively encouraging citizens, particularly the low and moderate-income population, to participate in the planning process for the five-year Consolidated Plan, the Annual Action Plan, the submission of Substantial Amendments, and the development of the Consolidated Annual Performance Evaluation Report (CAPER).

The City encouraged and sought broad participation but especially encouraged participation from lowand moderate-income persons, residents of predominantly low- and moderate-income neighborhoods, minorities, non-English speaking persons, persons with disabilities, public housing residents, local and regional institutions, businesses, developers, and nonprofit organizations.

All public meetings were held in a location convenient to residents, particularly those that are potential or actual beneficiaries, and were in an accessible location. Meetings were held at times to provide maximum flexibility for an array of citizen schedules. Attention is given to ensure meeting times increase the probability of maximum citizen participation. In addition to making staff available to field all input received via email, phone, or in-person communication, the City held a public technical assistance meeting in September, an advertised Needs Hearing in October, four CDBG Advisory Committee meetings which are open to the public, and a Public Hearing in February. All public hearings were preceded by a posted and advertised written comment period in accordance with the Citizen Participation Plan. Notice of meetings is posted in accessible locations and notice of public hearings are

posted in agency partner locations to seek target population input. The draft plan and information about the process are posted on the City's website as well.

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.

Citizen participation includes actively encouraging citizens, particularly the low and moderate-income population, to participate in the planning process for the AAP. All public comments are included in the development of the plan. No public comments were received during the written comment periods. At the Needs Hearing held on October 19, 2023, one oral comment was received regarding the impact of uranium on the health and wellbeing of Pocatello residents.

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

Pocatello accepts and records all comments.

7. Summary

Pocatello has an adopted Citizen Participation Plan (CPP) implemented in conjunction with the Annual Action Plan. The CPP provides the framework for public input into the allotment of CDBG funds granted to the City. Pocatello's CPP is used to guide how it gives notice and provides outreach to residents for public hearings regarding all aspects of the CDBG process.

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
Lead Agency	POCATELLO	
CDBG Administrator	POCATELLO	Neighborhood & Community Services
HOPWA Administrator		
HOME Administrator		
HOPWA-C Administrator		

Table 2 – Responsible Agencies

Narrative (optional)

The City of Pocatello is the entity responsible for preparing the Consolidated Plan and for the administration of each grant program and funding source. The City effectively administers the grant programs by using dedicated staff within its Neighborhood and Community Services (NCS) Division, a division within the City's Planning and Development Services Department. NCS Division staff include: Grants Manager who serves as the Division Manager and is responsible for the administration and oversight of all entitlement funded programs, including Subrecipients; CDBG Grants Administrator/Compliance Analyst who is responsible for the implementation of programs and also conducts subrecipient monitoring, is the Labor Standards Officer, and is the Loan Officer; CDBG Property Rehabilitation Specialist who administers the RENEWAL rehab grant and loan program as well as oversees lead hazard control projects, public facility projects, public infrastructure projects, and completes environmental reviews; Lead Program Administrator who is a certified Lead Inspector/ Risk Assessor who ensures compliance with the lead safe housing rule for rehabilitation projects; and an Public Outreach & Grant Coordinator who assists with administration of programs and ensures eligibility of applicants in addition to conducting community outreach.

The City's PY2022-2026 Consolidated Plan was completed and adopted by HUD in 2022. This subsequent PY24 Annual Action Plan reflects the Consolidated Plan and the staff described herein are responsible for proper administration in accordance with the Consolidated Plan.

Consolidated Plan Public Contact Information

The City of Pocatello's PY2022-2026 Consolidated Plan, which includes an Analysis of Impediments and Fair Housing Plan and the Citizen Participation Plan, is available at Pocatello City Hall, 911 North 7th, during usual business hours, as are the current year's Annual Action Plan and most recent Consolidated Annual Performance and Evaluation Report. These same documents are also available on the City's website at www.pocatello.gov. The City's Neighborhood & Community Services Division staff is available to provide information and technical assistance to agency representatives and the general public, during usual business hours or via email at: ncs@pocatello.gov or phone at 208-234-6186.

Annual Action Plan 2024

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

1. Introduction

In conformance with its Citizen Participation Plan, a variety of agencies were included in the consultation phase of the Annual Action Plan (AAP) development. In particular, the City works to engage and involve those agencies working with, providing services to, and representing low- and moderateincome persons. Specifically, the City holds an annual Technical Assistance meeting to begin the Annual Action Plan planning process. This meeting invites all local stakeholders, totaling nearly 75 agencies, to attend the meeting to learn about CDBG, identify eligible projects, outline Consolidated Plan goals, and seek feedback regarding community needs for the target population. After the Technical Assistance meeting, the City conducts a Public Needs Hearing at a City Council meeting. This needs hearing is advertised in a local paper of general circulation, posted on the City website and social media channels, posted on the City Council agenda, and posted throughout the City at locations targeting low- and moderate-income residents. The City gathers feedback from residents and agency representatives at the hearing. Finally, as part of the AAP development process, local agencies may submit letters of interest, draft applications, and final applications for CDBG funding requests. These applications are reviewed by staff for eligibility and submitted to the CDBG Advisory Committee who meets several times throughout November and December to review the applications and score them based on a rubric designed to align with the Consolidated Plan goals. These are publicly advertised meetings, open to the members of the public. Agencies are asked to present their applications to the Advisory Committee and community needs are discussed. The CDBG Advisory Committee is a seven-member board appointed by the Pocatello City Council that provides input on community needs, evaluates proposals for CDBG funding, and reviews progress made toward meeting community goals. Membership of the committee includes community, business, and civic leaders, a majority of whom must be residents of the City's neighborhood associations which represent the majority low- and moderate-income resident census tracts.

In addition to these formal methods, CDBG staff meets on a frequent, informal basis with staff members of these local agencies to ensure that programs are addressing the most pressing needs. Outreach is conducted frequently throughout the entire program year through attendance at events, meetings, commission meetings, and community board meetings. The City's Public Outreach and Grant Coordinator attends several community meetings and events to solicit feedback and promote CDBG programs. Needs and gaps are often identified by agencies at these group meetings and used to inform the CDBG AAP.

Finally, the Pocatello City Council holds a public hearing on the draft AAP to allow oral comment, after which the plan and amendments may be approved for submission to HUD. This public hearing is preceded by a written comment period in accordance with the City's Citizen Participation Plan. The Consolidated Plan provides the groundwork for development of each year's AAP. While consultation and outreach are not as broad annually as for the development of the Consolidated Plan, many of the same

agencies are consulted and invited to not only comment on potential activities, but also to be applicants themselves. The City takes proactive steps to ensure needs are addressed and the projects align with the broader Consolidated Plan goals.

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 has established a close relationship with local public and assisted housing providers as well as those local agencies providing services to low- and moderate-income residents including mental health and service agencies. The City of Pocatello is a member organization of the Homeless and Housing Coalition of Southeast Idaho. This group originally was created to coordinate and collaborate on housing, homeless, and special needs population issues. Coalition members include representatives of 20 different public agencies and nonprofit organizations, including those working on homelessness issues, public and affordable housing providers, mental health service providers, and social service providers. The Coalition serves as the Region V organization under the Idaho Balance of State Continuum of Care (CoC), working under a Collaborative Agreement with the Idaho Homelessness Coordinating Committee (IHCC) and Idaho Housing and Finance Association (IHFA). Coalition members participate as representatives to the IHCC and its committees, including: Governance; Strategic Planning; Data Collection, Reporting, and Evaluation; Continuum of Care Planning; and Point-in-Time Count.

In addition, the City works closely with the Pocatello Housing Alliance and Community Partnership (HACP), the City's housing authority. The City will continue to coordinate activities with the HACP to leverage resources to address public housing as applicable.

Similarly, the City is working directly with local agencies to provide housing, health, mental health, and other services to low- and moderate-income residents. This includes partnership and Subrecipient funding for housing, public service, and public facility projects with: Aid for Friends, Boys & Girls Club, New Day Products, Pocatello Free Clinic, Saint Vincent de Paul, and Senior Activities Center. These agencies all provide services to address the needs of the target population and provide for coordination of activities to improve outcomes.

Describe coordination with the Continuum of Care and efforts to address the needs of homeless persons (particularly chronically homeless individuals and families, families with children, veterans, and unaccompanied youth) and persons at risk of homelessness.

The City of Pocatello does not receive ESG or HOPWA funding. The City works to reduce homelessness through homelessness prevention and rapid rehousing programs as part of the City's CDBG allocation. As part of the Homeless and Housing Coalition of Southeast Idaho's "Balance of State" Continuum of Care, the designated regional entity directly receiving the funds. As active members of the Homeless and Housing Coalition of Southeast Idaho, the City of Pocatello regularly coordinates with agencies to foster

communication of affordable housing and projects for special needs/homeless populations. Coalition members include representatives of 20 different public agencies and nonprofit organizations, including: those working on homelessness issues; public and affordable housing providers; and mental health and social services providers. The Coalition began functioning as the Region V organization under the Idaho Balance of State Continuum of Care (CoC), working under a Collaborative Agreement with the Idaho Homelessness Coordinating Committee (IHCC) and Idaho Housing and Finance Association (IHFA). Coalition members participate as representatives to the IHCC and its committees, including Governance, Strategic Planning, Data Collection, Reporting, Evaluation, Continuum of Care Planning, and Point-in-Time homeless counts.

On a less formal level, staff members of the involved agencies maintain a close working relationship and assist one another whenever possible. This communication and inter-agency work is facilitated by the City Staff availability, at the bi-monthly Homeless and Hosing Coalition meetings, and often at CDBG Advisory Committee meetings. This collaboration also includes the organizations that receive other HUD funding, such as Southeast Idaho Community Action Agency (SEICAA), Bannock Youth Foundation (BYF), Family Services Alliance (FSA), and Aid for Friends (AFF).

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

Idaho Housing and Finance Association (IHFA) is a uniquely created and organized financial institution and administrator of affordable housing resources. In its simplest form, IHFA's

mission is to provide funding for affordable housing opportunities in Idaho communities where they are most needed and when it is economically feasible.

IHFA is a self-supporting corporation that must generate all revenue necessary to cover the cost of its operations. It does this by earning fees for work performed and does not use any state-appropriated funds for its operations. It functions as an agent for the US Department of Housing and Urban Development and performs various tasks associated with financing, developing, or managing affordable housing. Idaho Housing and Finance Association provides services through the HUD's HOPWA, ESG, and CoC programs.

Idaho Housing and Finance Association is designated by the Idaho Homelessness Coordinating Committee (IHCC) to serve as the Collaborative Applicant for the CoC. The Collaborative Applicant is responsible for coordination, communication, record-keeping of meeting agendas and minutes, annual reporting, completion, and submittal of the annual CoC program application, general program administration and oversight, monitoring, and other duties as assigned. IHFA is also the Homeless Management Information System (HMIS) Lead for all of Idaho.

Idaho Housing and Finance Association currently contracts with HOPWA service providers throughout the State of Idaho that specialize in HIV/AIDS-related services and/or low-income rental assistance programs.

As active members of the Homeless and Housing Coalition of Southeast Idaho, the City participates in the Idaho Balance of State Continuum of Care. Within this organization, issues surrounding Emergency Solutions Grant funds are reviewed, including allocation, performance standards, and how--or whether-the projects and activities funded by ESG have furthered the goals of the continuum of care. Additionally, as part of the Balance of State Continuum of Care, the Homeless and Housing Coalition participates in the Data Collection, Reporting, and Evaluation Committee, which oversees the operation and administration of HMIS.

City of Pocatello CDBG staff members respond to IHFA surveys and attend meetings as planned. The City often refers clients to IHFA programs and has worked with the agency in a variety of ways such as through the partial acquisition of the Aid for Friends homeless shelter and fair housing training.

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 3 – Agencies, groups, organizations who participated

1	Agency/Group/Organization	AID FOR FRIENDS		
	Agency/Group/Organization Type What section of the Plan was addressed by	Services - Housing Services-Children Services-Elderly Persons Services-Victims of Domestic Violence Services-homeless Homeless Needs - Chronically homeless		
	Consultation?	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?	Aid for Friends is a multifaceted resource center providing services and opportunities to overcome or prevent homelessness in Southeast Idaho. In addition to the Emergency Shelter, they also provide their clients with case management services to support self-sufficiency, a transitional housing program, and a host of other community services. Aid for Friends is also the local designated Access Point for the region. Aid for Friends attended the City's Technical Assistance meeting and provided feedback on the needs for PY24. In addition, the agency presented two applications for CDBG funding for public services: PRT tickets for transportation and Case Management services for clients. Finally, the City will continue funding for the partial acquisition of the shelter. The City will partner with Aid for Friends as a subrecipient to achieve the goals outlined in the Consolidated Plan as articulated in this AAP.		
2	Agency/Group/Organization	Boys & Girls Club		
	Agency/Group/Organization Type	Services-Children		

	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 Boys & Girls Club provides services for low and moderate-income families through a children's after school and summer program. The Boys & Girls Club attended the City's Technical Assistance meeting as well as submitted an application for funding for public services. The demand for programming for this target group is high in Pocatello. Through the TA meeting and application process, the City was able to receive feedback on these needs and incorporate it into the Public Services project for PY24.		
3	Agency/Group/Organization	New Day Products and Resources		
	Agency/Group/Organization Type	Services-Persons with Disabilities Services-Employment		
	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?	New Day Products offers a community therapy program giving jobs and resources to disabled persons all across Southeast Idaho. In particular, New Day Products provides training and workforce development for disabled persons in the target area. New Day Products attended the City's Technical Assistance meeting and submitted an application for public service funding for PY24. The City will partner with New Day Products to provide public services to their clientele through a case management program in PY24 as well as continue to collaborate as a partner for resource referral, outreach, communication, and any other relevant areas.		
4	Agency/Group/Organization	Pocatello Neighborhood Housing Services dba NeighborWorks Pocatello		
	Agency/Group/Organization Type	Housing Services - Housing		

What section of the Plan was addressed by Consultation?	Housing Need Assessment Non-Homeless Special Needs Economic Development 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?	NeighborWorks Pocatello is a chartered member of the NeighborWorks America network of trained and certified community development organizations at work in more than 2,000 communities across the United States. NeighborWorks Pocatello was created by the community in 1993 to revitalize the central neighborhoods of Pocatello. NeighborWorks Pocatello works towards this goal in several ways including housing development projects, beautification programs, local neighborhood investment, and housing-related education and training opportunities for the City's target populations. The City often consults and works with NeighborWorks on a number of programs to determine the City's needs for housing. NeighborWorks attended the City's Technical Assistance meeting in PY24. While they did not submit an application for funding, NeighborWorks and the City will continue a strong partnership through referrals to mobile home loan and repair programs offered.
Agency/Group/Organization	Pocatello Free Clinic
Agency/Group/Organization Type	Health Agency
What section of the Plan was addressed by Consultation?	Non-Homeless Special Needs

	Briefly describe how the Agency/Group/Organization	The Pocatello Free Clinic provides quality health care to the medically under-			
	was consulted. What are the anticipated outcomes of	served of Southeast Idaho and to promote the health and well-being of the			
	the consultation or areas for improved coordination?	community through disease prevention, continuity of care, and education. As one of the oldest free clinics in the United States, the Pocatello Free Clinic provides free medical and dental care, including labs and prescriptions, to those who are uninsured and below 300% of the Federal Poverty Level. The clinic is managed by an Executive Director under the supervision of a volunteer Board of Directors. The clinic is staffed by an MD and an assistant, clinic coordinator, certified nursing assistant, and registered nurse. The Free Clinic attended the City's Technical Assistance meeting and submitted an application for dental services, indicating the public service need in the community.			
6	Agency/Group/Organization	Senior Activity Center			
	Agency/Group/Organization Type	Services-Elderly Persons			
	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 Senior Activity Center (SAC) strives to provide daily nutritional meals that support nutritional, physical, cognitive and socialization activities that serve the City's senior population. This enriches the daily lives of seniors by providing a creative environment that stimulates them nutritionally, physically, mentally and socially. The Senior Activity Center works to provide a daily well-balanced lunch to seniors over the age of 60 who financially or physically may not be able to provide for themselves. In PY24, CDBG will continue to partner with the SAC to provide nutrition program services that will address non-homeless special needs through an elder services-focused activity.			

7 A §	gency/Group/Organization	Saint Vincent De Paul Society Holy Spirit Conference		
Ag	gency/Group/Organization Type	Services - Housing		
		Services-Elderly Persons		
		Services-Health		
		Services-Education		
		Services-Employment		
w	/hat section of the Plan was addressed by	Non-Homeless Special Needs		
Co	onsultation?			
Briefly describe how the Agency/Group/Organization		St. Vincent de Paul is one of the oldest social service agencies in Pocatello,		
w	as consulted. What are the anticipated outcomes of	offering a public food bank, social service program for short-term assistance, and		
th	ne consultation or areas for improved coordination?	providing discounted goods and amenities through their thrift store. The thrift		
		store also operates as a means to employ low- and moderate-income residents.		
		The City will partner with St. Vincent de Paul to provide public services to their		
		clientele in PY24 as well as continue to collaborate as a partner for resource		
		referral, outreach, communication, and any other related projects.		

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

The City continues to consult with all required organizations in helping to formulate a strategy for the efficient use of HUD Community Development Block Grant (CDBG) funds.

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	Idaho Housing and	Idaho Housing and Finance Association (IHFA) and the City of Pocatello are both committed to		
		ensuring greater access to fair and affordable housing, the reduction/prevention of homelessness,		
	Finance	and access to credit for homeownership. The City participates in many joint efforts and organizations		
	Association	with IHFA to help support increasing housing options for residents.		

Table 4 – Other local / regional / federal planning efforts

Narrative (optional)

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

Citizen participation includes actively encouraging citizens, particularly the low- and moderate-income population, to participate in the planning process for the five-year Consolidated Plan, the Annual Action Plan, the submission of Substantial Amendments, and the development of the Consolidated Annual Performance Evaluation Report (CAPER). All notices of public meetings relating to this process are published in the local newspaper prior to the public meeting as well as advertised at target locations and on the City's website. Public comment periods also offer a written comment opportunity ahead of the oral comment public hearing.

Adhering to HUD guidelines, the Annual Action Plan draft was posted on the City's website, made known to grant subrecipients, and noticed in the local newspaper. In addition, the draft plan notice is published in locations across Pocatello to reach the target population. The City encouraged and sought broad participation but especially encouraged participation from low- and moderate-income persons, residents of slum and blighted areas, residents of predominantly low- and moderate-income neighborhoods, minorities, non-English speaking persons, persons with disabilities, public housing residents, local and regional institutions, businesses, developers, nonprofit organizations, philanthropic organizations, and community or faith-based organizations. This outreach consisted of several public meetings, attendance at local community events and community meetings to solicit feedback, the conducting of a public needs hearing with a written comment period, a technical assistance meeting, and one-on-one technical assistance and engagement with agencies providing services to the target populations.

All public meetings are held in a location convenient to residents, particularly those who are potential or actual beneficiaries. Meetings are held at times to provide maximum flexibility for an array of citizen schedules. Attention is given to ensure meeting times increase the probability of full citizen participation. The City offers accessibility and language accommodations and publishes the information on the City's website which includes PageAssist technology for accessibility needs. All Public Hearings and Comment Periods are advertised in the local newspaper of general circulation. Meetings are recorded and broadcast live as well as made available for re-broadcast. Staff are available to field inquiries and all documents can be made available in Spanish upon request.

Annual Action Plan 2024 **Citizen Participation Outreach**

Sort Order	Mode of Outreach	Target of Outreach	Summary of	Summary of	Summary of comments	URL (If
			response/attendance	comments received	not accepted	applicable)
					and reasons	

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)
			meeting and were			
			made available to			
			provide technical			
			assistance to			
			attendees. Attendees			
			were also provided a			
			detailed schedule of			
			the Annual Action			
			Plan planning			
			process, including			
			public hearing			
			opportunities.			

Sort Order	Mode of Outreach	Target of Outreach	Summary of	Summary of	Summary of comments	URL (If
			response/attendance	comments received	not accepted	applicable)
					and reasons	
			The City advertised a			
			Needs Hearing to be			
			conducted at an			
			October City Council			
			meeting as a public			
			hearing. Included in			
			this advertisement			
			was the opportunity			
			to submit written			
		Non-	comments to be	No written		
2	Newspaper Ad	targeted/broad	included in the	comments were	All comments are	
		community	correspondence	received.	accepted.	
			recorded with the			
			Public Hearing as well			
			as any oral comments			
			received at the			
			hearing. This was			
			advertised in a local			
			newspaper of general			
			circulation on			
			October 4, 2023.			

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)
3	Public Hearing	Non- targeted/broad community	The City held a public hearing at the October 19, 2023 City Council meeting. This meeting was advertised in the Idaho State Journal as well as posted with the City Council agenda on the City's website, at City Hall, and in other locations. The Needs Hearing was held in an accessible location, live streamed, and recorded for rebroadcast.	One oral comment was received at the Public Hearing regarding how health concerns from legacy uranium may impact housing in the community. The comment was recorded by Staff and incorporated into the plan priorities as applicable.	All comments were accepted and noted.	

			Pocatello has an			
			active and engaged			
			CDBG Advisory			
			Committee that			
			meets regularly and			
			provides			
			programmatic			
			oversight. The CDBG	All comments from		
			Advisory Committee	the CDBG Advisory		
			(Committee) met	Committee are		
			frequently			
				incorporated into		
		Non-	throughout the	the Annual Action		
	targeted/broad community	Annual Action Plan	Plan. Their			
		community	process: September	recommendation	All comments are	
4	Public Meeting	·	19, 2023 - The	for funding based	accepted and noted.	
		Community	Advisory Committee	on review of the	·	
		Stakeholders	met and staff	community needs		
			provided an update	and alignment with		
			on the Technical	Consolidated Plan		
			Assistance meeting,	goals are		
			the upcoming Needs	incorporated in the		
			Hearing, and the	AAP.		
			Program year 2024			
			planning process.			
			This included a			
			summary of the			
			feedback received at			
			the technical			
			assistance meeting,			

review of any letters
of interest received
from local service
agencies, and a
review of the
application and
application scoring
tool. October 17,
2023 - The scheduled
meeting was
cancelled due to a
lack of a quorum.
However, the
meeting packet with
the preliminary
applicants for PY24
funding was
distributed and
included with the
meeting notice.
November 28, 2023 -
The Committee met
to review the final
applications for PY24
funding. This
included project
presentations from
local service
providers to explain

	their needs for CDBG		
	funding. December 5,		
	2023 - The		
	Committee met to		
	review the final		
	applications for PY24		
	funding. This		
	included a review of		
	the requests, scoring		
	the applications, and		
	comparing the scores		
	to the Consolidated		
	Plan goals and		
	community needs.		
	The Committee		
	developed a final		
	recommendation for		
	PY24 funding needs		
	and voted on		
	submitting the		
	recommendation to		
	Council. This will be		
	included in the draft		
	Annual Action Plan		
	that will go before		
	the public for		
	comment and will be		
	voted on by City		

Sort Order	Mode of Outreach	Target of Outreach	Summary of	Summary of	Summary of comments	URL (If
			response/attendance	comments received	not accepted	applicable)
					and reasons	
			Council for approval			
			submission to HUD.			

			The City advertised a			
			written comment			
			opportunity and a			
			Public Hearing to be			
			conducted at the			
			February 1, 2024 City			
			Council meeting. As			
			noted, this			
			advertisement			
			includes a 30-day			
		Non-English	period to submit			
	Speaking - Specify other language:	_	written comments to			
		be included in the				
		correspondence		All comments that are		
5	Newspaper Ad	Spanish	recorded with the	TBD	received are noted and	
		Niere	Public Hearing as well		incorporated.	
		Non-	as any oral comments			
		targeted/broad	received at the			
		community	hearing. This was			
			advertised in a local			
			newspaper of general			
			circulation on			
			December 19, 2023			
			as well as posted at			
			various locations			
			throughout Pocatello			
			that will reach the			
			target population.			
			The advertisement			

Sort Order	Mode of Outreach	Target of Outreach	Summary of	Summary of	Summary of comments	URL (If
			response/attendance	comments received	not accepted	applicable)
					and reasons	
			provides a copy of			
			the draft Annual			
			Action Plan for the			
			community to			
			comment on.			

			The City will hold a			
			public hearing at the			
			February 1, 2024 City			
			Council Meeting. This			
			is the oral comment			
			opportunity for the			
			PY2024 Annual			
			Action Plan. The			
			hearing is advertised			
			in the Idaho State			
			Journal as well as			
			posted with the City			
			Council agenda on			
		Non-	the City's website, at		All comments received	
6	Public Hearing	targeted/broad	City Hall, and in other	TBD	will be accepted and	
		community	locations. The Public		noted.	
			Hearing is held in an			
			accessible location,			
			love streamed, and			
			recorded for re-			
			broadcast. This			
			hearing is the oral			
			comment			
			opportunity for the			
			community as a			
			whole regarding the			
			PY2024 Annual			
			Action Plan.			
			Following the Public			

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)
			Hearing, City Council			
			may wish to approve			
			the PY24 AAP for			
			submission to HUD.			

Table 5 – Citizen Participation Outreach

Expected Resources

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

Introduction

The City anticipates using its annual entitlement allocation to fulfill the goals established in the PY2022-PY2026 Consolidated Plan and those goals articulated in this PY2024 Annual Action Plan. The City also anticipates it will receive \$25,000 in program income to be used for eligible CDBG project expenses. Prior year resources will be allocated toward established projects, most of which were approved in the PY23 Action Plan but have not yet been spent in PY23. This includes the Federal Transit Authority funding which the Pocatello Regional Transit has partnered with the City to complete public infrastructure projects. The City will continue to encourage local agency partners to allocate portions of their funding toward public service activities to ensure programs can extend beyond the CDBG-funded portion. Finally, the CDBG program will continue to match the Lead Safe and Healthy Homes program, and leverage those resources to complete lead-based paint remediation in units as well as

address healthy homes hazards and concerns.

Anticipated Resources

Program	Source	Uses of Funds	Expec	ted Amoun	t Available Ye	ar 1	Expected	Narrative Description
	of		Annual	Program	Prior Year	Total:	Amount	
	Funds		Allocation:	Income:	Resources:	\$	Available	
			\$	\$	\$		Remainder	
							of ConPlan	
CDBG	public -	Acquisition						The City anticipates an annual entitlement
	federal	Admin and						of less than the previous Program Year
		Planning						based off of the trend for funding the last
		Economic						several years. The anticipated entitlement
		Development						is, therefore, \$375,000. In addition, it is
		Housing						expected that Program Income will be
		Public						about \$25,000 as a result of income
		Improvements						received from rehabilitation project loan
		Public Services						repayments. All previous program year
								resources are allocated or accounted for,
								therefore no prior year resources will be
			376,595	25,000	0	401,595	800,000	used for PY24 activities.

Table 6 - 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

In PY24, the CDBG program is not explicitly leveraging federal funds or other outside resources. In PY23 the City partnered with Pocatello Regional Transit to leverage Federal Transit Administration (FTA) funding for the repair or replacement of sidewalks located in low-to-moderate income areas that lead to or improve accessibility and mobility to transit stops. These projects may be completed in PY24. For private, state, and local fund leverage, the City identifies opportunities to layer CDBG-funding with allowable and allocable projects as they arise. The City also

relies on in-kind services of City Staff, such as building inspectors or engineers, to complete housing or public infrastructure activities. These resources are not explicitly quantified but are leveraged to conduct the CDBG program.

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

Publicly owned land or property within the jurisdiction will be used to achieve public infrastructure needs. Specifically, the City owns the public right of way for streets, sidewalks, and parks. The City will utilize CDBG funding to remove architectural barriers and create ADA-accessible facilities particularly for sidewalks in the community. In addition, the City leases a public facility to the Senior Activities Center, which serves as the nonprofit entity to administer programs for seniors in the City. The Senior Activity Center will continue to operate their nutrition program which is funded with CDBG funding out of the public facility. In addition, the Bannock Youth Foundation leases a public facility to operate a youth homeless shelter. Finally, the Boys & Girls Club operates its programs out of the School District #25 Pocatello elementary schools, which are public buildings.

Discussion

The City expects partners to leverage CDBG funding to the fullest extent possible to implement robust programs that will help further the needs of area residents

Annual Goals and Objectives

AP-20 Annual Goals and Objectives

Goals Summary Information

Sort	Goal Name	Start	End	Category	Geographic	Needs Addressed	Funding	Goal Outcome Indicator
Order		Year	Year		Area			
1	Public Facilities	2022	2026	Homeless	Pocatello	Provide Decent	CDBG:	Homeless Person Overnight
	and			Non-Homeless	Citywide	Housing	\$50,000	Shelter: 335 Persons Assisted
	Improvements			Special Needs		Create a Suitable		
				Non-Housing		Living		
				Community		Environment		
				Development		Expand		
						Opportunities for		
						LMI Persons		
2	Public	2022	2026	Non-Housing	Pocatello	Create a Suitable	CDBG:	Public Facility or Infrastructure
	Infrastructure			Community	Citywide	Living	\$50,000	Activities other than
				Development		Environment		Low/Moderate Income Housing
								Benefit: 2346 Persons Assisted
3	Public Services	2022	2026	Non-Homeless	Pocatello	Create a Suitable	CDBG:	Public service activities other than
				Special Needs	Citywide	Living	\$70,292	Low/Moderate Income Housing
				Non-Housing		Environment		Benefit: 983 Persons Assisted
				Community		Expand		
				Development		Opportunities for		
						LMI Persons		

Sort	Goal Name	Start	End	Category	Geographic	Needs Addressed	Funding	Goal Outcome Indicator
Order		Year	Year		Area			
4	Housing	2022	2026	Affordable	Pocatello	Provide Decent	CDBG:	Rental units rehabilitated: 4
				Housing	Citywide	Housing	\$150,984	Household Housing Unit
						Create a Suitable		Homeowner Housing
						Living		Rehabilitated: 52 Household
						Environment		Housing Unit
5	Program	2022	2026	Affordable	Pocatello	Provide Decent	CDBG:	Other: 1 Other
	Administration			Housing	Citywide	Housing	\$80,319	
				Public Housing		Create a Suitable		
				Homeless		Living		
				Non-Homeless		Environment		
				Special Needs		Expand		
				Non-Housing		Opportunities for		
				Community		LMI Persons		
				Development				

Table 7 – Goals Summary

Goal Descriptions

1	Goal Name	Public Facilities and Improvements
	Goal	The City will fund partial acquisition of the homeless person overnight shelter. This partial acquisition is year five of a five-
	Description	year plan to support partial acquisition for Aid for Friends.

2	Goal Name	Public Infrastructure
	Goal Description	CDBG funds will be used to repair, replace, and install sidewalks in qualifying low- and moderate-income areas (LMA) as well as for qualifying low- and moderate-income clients (LMC). The program removes architectural barriers to mobility as well as ensures ADA-compliance. This year's funding will focus on census tract area 16005000900.
3	Goal Name	Public Services
	Goal Description	The City will partner with local non-profit service providers to address homeless and non-homeless special needs as well as non-housing community development. Activities that will be funded include: Aid for Friends Case management services; Aid for Friends PRT tickets; Boys & Girls Club after school program; New Day Products case management services; Pocatello Free Clinic dental services; Senior Activity Center nutrition program; and St. Vincent de Paul social services program.
4 Goal Name Housing		Housing
	Goal Description	Housing projects for PY24 include: RENEWAL property rehabilitation grants and loans; and the Lead Safe and Healthy Homes program for lead-based paint remediation.
5	Goal Name	Program Administration
	Goal Description	Program administration encompasses the administration of the CDBG program including all planning, administration, and fair housing activities conducted by program staff.

Projects

AP-35 Projects – 91.220(d)

Introduction

Annually the City undergoes a technical assistance and program year planning process to identify project needs in conjunction with the goals and objectives outlined in the five-year Consolidated Plan. The City works closely with the CDBG Advisory Committee as well as various public service agencies, organizations, coalitions, and the community to determine needs. In PY2024, funding will continue to be allocated toward the ever-increasing demand for housing rehabilitation grants and loans, particularly for homes with long-overdue rehab needs.

The City's RENEWAL program leverages small grants for minor repairs for those income-qualifying residents and couples this with interest-free, fully or partially deferred loans for larger projects. The City provides RENEWAL program grants and loans to single family homes as well as mobile homes. Often these rehab grants and loans improve public health and safety concerns as well as emergency repairs for items such as sewer lines, furnaces, roof, or hot water heaters. The City coordinates with its Lead Hazard control grant to not only resolve potential lead-based paint hazards but also to provide comprehensive assistance to those most in need. By coupling the CDBG and Leah Hazard Control and Healthy Homes funding, the federal funds can be leveraged to have greater impact and better preserve the City's affordable housing stock and the homes of the low- and moderate-income residents.

In addition to housing needs, the City will continue to address public infrastructure demands through the sidewalk repair and replacement program which seeks to improve accessibility and develop ADA-compliant paths, sidewalks, walkways, and access points. The City will leverage federal funding through the Federal Transit Authority in a partnership with our local transit authority to create cost efficiencies and expand the reach of infrastructure projects.

The City will address individual needs of the low- and moderate-income population, particularly homeless needs, through continued support for the partial acquisition of the homeless shelter. In addition, service funding will go toward transportation and case management services provided to homeless individuals by Aid for Friends. Other service needs affecting health, environment, living conditions, and economic opportunities will be addressed through various public service projects provided by partners including: Boys & Girls Club, New Day Products, Pocatello Free Clinic, Senior Activity Center, and St. Vincent de Paul.

Finally, the City's administrative services will account for planning and administration of the entitlement

funding as well as technical assistance, regulatory compliance, fair housing activities, and more.

Projects

#	Project Name
1	PY2024 Public Facilities and Improvements
2	PY2024 Public Infrastructure
3	PY2024 Public Services
4	PY2024 Housing
5	PY2024 Program Administration

Table 8 - Project Information

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

These allocation priorities reflect the goals identified in the consolidated plan as well as the prioritized needs identified during the public outreach process for AAP development. Primary obstacles to addressing underserved needs stem from a lack of available funding compared to the demand. In the AAP development process, 11 local agencies attended the City's technical assistance meeting and 8 agencies submitted applications for funding. Further, the City was only able to award about 70% of the funding requests for public services. Agencies expressed the need for continued funding to meet the demand for services. In addition to funding, expenses continue to rise as the country faces inflation, contractor demand, labor shortages, cost of materials increases, and rising health care and benefit costs. It is more challenging than ever to recruit and retain service providers at local agencies in the nonprofit sector, and the construction industry is facing similar issues with labor shortages. The demand for contractors locally well exceeds the available supply. This results in increasing costs and an inability to efficiently help the underserved populations.

AP-38 Project Summary

Project Summary Information

1	Project Name	PY2024 Public Facilities and Improvements
	Target Area	Pocatello Citywide
	Goals Supported	Public Facilities and Improvements
	Needs Addressed	Provide Decent Housing Create a Suitable Living Environment Expand Opportunities for LMI Persons
	Funding	CDBG: \$50,000
	Description	The City will fund partial acquisition of the homeless person overnight shelter. This partial acquisition is year five of a five-year plan to support partial acquisition for Aid for Friends.
	Target Date	3/31/2025
	Estimate the number and type of families that will benefit from the proposed activities	It is estimated that 335 low- and moderate-income clients will benefit from the proposed activity.
	Location Description	The project will take place at the Aid for Friends homeless overnight shelter, located at 209 E. Lewis St., Pocatello, ID 83201
	Planned Activities	The planned activities include partial acquisition of the Aid for Friends homeless overnight shelter.
2	Project Name	PY2024 Public Infrastructure
	Target Area	Pocatello Citywide
	Goals Supported	Public Infrastructure
	Needs Addressed	Create a Suitable Living Environment
	Funding	CDBG: \$50,000
	Description	CDBG funds will be used to repair, replace, and install sidewalks in qualifying low- and moderate-income areas (LMA) as well as for qualifying low- and moderate-income clients (LMC). The program removes architectural barriers to mobility as well as ensures ADA-compliance. This year's funding will focus on census tract area 16005000900.
	Target Date	3/31/2025

	Estimate the number and type of families that will benefit from the proposed activities	The project anticipates assisting low- and moderate-income clients as well as low- and moderate-income areas located in qualifying census tract areas. It is anticipated 2,346 persons will benefit.
	Location Description	The project activities will take place citywide in qualifying low- and moderate-income areas as well as at individually qualifying LMC locations in the City of Pocatello.
	Planned Activities	CDBG funds will be used to repair, replace, and install sidewalks in qualifying low- and moderate-income areas (LMA) as well as for qualifying low- and moderate-income clients (LMC). The program removes architectural barriers to mobility as well as ensures ADA-compliance.
3	Project Name	PY2024 Public Services
	Target Area	Pocatello Citywide
	Goals Supported	Public Services
	Needs Addressed	Create a Suitable Living Environment Expand Opportunities for LMI Persons
	Funding	CDBG: \$70,292
	Description	The City will partner with local non-profit service providers to address homeless and non-homeless special needs as well as non-housing community development. Activities that will be funded include: Aid for Friends Case management services; Aid for Friends PRT tickets; Boys & Girls Club after school program; New Day Products case management services; Pocatello Free Clinic dental services; Senior Activity Center nutrition program; and St. Vincent de Paul social services program.
	Target Date	3/31/2025
	Estimate the number and type of families that will benefit from the proposed activities	An estimated 983 low- and moderate-income families will benefit from the proposed activities.
	Location Description	The service activities will take place at various locations that serve qualifying clientele through eligible activities in the City of Pocatello.

_		
	Planned Activities	The City will partner with local non-profit service providers to address homeless and non-homeless special needs as well as non-housing community development. Activities that will be funded include: Aid for Friends Case management services; Aid for Friends PRT tickets; Boys & Girls Club after school program; New Day Products case management services; Pocatello Free Clinic dental services; Senior Activity Center nutrition program; and St. Vincent de Paul social services program.
4	Project Name	PY2024 Housing
	Target Area	Pocatello Citywide
	Goals Supported	Housing
	Needs Addressed	Provide Decent Housing Create a Suitable Living Environment
	Funding	CDBG: \$150,984
	Description	Housing projects for PY24 include: RENEWAL property rehabilitation grants and loans; and the Lead Safe and Healthy Homes program for lead-based paint remediation.
	Target Date	3/31/2025
	Estimate the number and type of families that will benefit from the proposed activities	An estimated 56 families that are low- and moderate-income will benefit from the proposed activities.
	Location Description	The projects will take place at qualifying units located in the City of Pocatello.
	Planned Activities	Housing projects for PY24 include: RENEWAL property rehabilitation grants and loans for approximately 17 units; and the Lead Safe and Healthy Homes program for lead-based paint remediation for approximately 4 rental units and 39 single family residences.
5	Project Name	PY2024 Program Administration
	Target Area	Pocatello Citywide
	Goals Supported	Program Administration
	Needs Addressed	Provide Decent Housing Create a Suitable Living Environment Expand Opportunities for LMI Persons
	Funding	CDBG: \$80,319

	Description	Program administration encompasses the administration of the CDBG program including all planning, administration, and fair housing activities conducted by program staff.
	Target Date	3/31/2025
	Estimate the number and type of families that will benefit from the proposed activities	N/A - planning and administration funds do not require specified beneficiaries.
	Location Description	The program will be administered by City of Pocatello staff, located at City Hall: 911 N. 7th Avenue, Pocatello, ID 83201.
	Planned Activities	Program administration encompasses the administration of the CDBG program including all planning, administration, and fair housing activities conducted by program staff.

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

The projects in PY24 do not emphasize any one geographic area of Pocatello. Funds are generally dispersed out geographically to have the most significant impact. The City does not have a singular concentration of low- to moderate-income residents. For those projects that are conducted on an area basis, such as the public infrastructure improvements, those funds will be directed to qualifying census tracts per HUD guidelines for the low- to moderate-income area (LMA) National Objective. While some projects focus on an LMA, they are not part of a greater neighborhood reinvestment or a designated Neighborhood Revitalization Strategy Area (NRSA).

Geographic Distribution

Target Area	Percentage of Funds	
Pocatello Citywide	100	

Table 9 - Geographic Distribution

Rationale for the priorities for allocating investments geographically

The majority of CDBG funded projects will be based on individual qualification as a low- and moderate-income household. Because LMI persons are not restricted to a specific geographic location, a Citywide distribution of resources allows for the program to address needs of all of the City's LMI persons. Similarly, the census tracts qualifying as LMA are distributed throughout the City. Therefore, allowing for a citywide distribution of funds ensures that all qualifying census tracts will be eligible for CDBG funding.

Discussion

All projects supported with CDBG funds are within the Pocatello city limits. The projects listed in the 2024 Action Plan will benefit low- and moderate-income residents throughout the City of Pocatello.

Affordable Housing

AP-55 Affordable Housing – 91.220(g)

Introduction

The City's housing programs are intended to prevent or end homelessness for individuals. The City accomplishes this through the effective administration and distribution of its limited CDBG resources. While public facility, infrastructure, and service programs provide necessary supplemental supports to ensure housing remains affordable for the program's target populations, it is the City's RENEWAL housing rehabilitation grant and loan program that allows the City to achieve this CDBG objective. The City internally operates its RENEWAL program to provide qualifying applicants with grants up to \$5,000 or loans for projects in excess of that amount for necessary repairs on their homes. Grants are administered to owner-occupied residences and mobile homes. Loans are administered to owner-occupied homeowners. Loan are offered at 0% interest and can be partially or fully deferred depending on the loan qualifying criteria of the applicant.

Similarly, the City received a HUD Office of Lead Hazard Control and Healthy Homes (OLHCHH) Lead Hazard Control and Healthy Homes Supplemental funding grant. CDBG funds will be used as the match for this program. Through the City's Lead Safe and Healthy Homes (LSHH) program, homes of qualifying LMI homeowners or rentals with four or fewer units will receive a lead inspection/risk assessment and any lead-based paint hazards will be remediated through the LSHH program. In addition, LSHH can identify any Healthy Homes issues and allocate funding toward those repairs. This program preserves the City's affordable housing stock while also resolving dangerous lead hazards from homes.

Overall, the City's top priority identified in the Consolidated Plan was affordable housing. As such, the City has dedicated the majority of its CDBG entitlement to these programs. The property rehabilitation programs ensure homeowners can remain housed and preserves the City's affordable housing stock and property tax value from those homes.

One Year Goals for the Number of Households to be Supported			
Homeless	0		
Non-Homeless	56		
Special-Needs	0		
Total	56		

Table 10 - 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			

Annual Action Plan

One Year Goals for the Number of Households Supported Through	
Rehab of Existing Units	56
Acquisition of Existing Units	0
Total	56

Table 11 - One Year Goals for Affordable Housing by Support Type

Discussion

As noted, the majority of the programs address rehab of existing units for those households facing major repairs, hazardous living conditions, and on the brink of homelessness. Therefore, the City anticipates the rehabilitation of about 56 units.

AP-60 Public Housing – 91.220(h)

Introduction

The Housing Alliance and Community Partnerships (HACP) is the City of Pocatello's housing authority that participates in the Section 8 Housing Choice Voucher (HCV), Public Housing, and Move to Work programs.

Housing Choice Voucher

HACP administers the Housing Choice Voucher Program under contract with the U.S. Department of Housing and Urban Development (HUD). This program enables very low-income families to obtain decent, safe, and affordable housing on the private market. To be eligible for assistance, applicants must qualify under HUD-established income limits and other eligibility criteria established by HACP. Program participants contribute between 30% to 40% of their monthly adjusted gross income towards rent and utilities, while HACP pays the difference in the contract rent directly to the landlord.

The Emergency Housing Voucher (EHV) program is available through the American Rescue Plan Act (ARPA). Through EHV, HUD is providing HACP with 15 EHV choice vouchers to assist individuals and families who are:

- Homeless
- At risk of becoming homeless
- Fleeing, or attempting to flee, domestic violence, dating violence, sexual assault, stalking, or human trafficking
- Were recently homeless or have high risk of housing instability

Christensen Courts - The Housing Alliance and Community Partnerships manages Christensen Courts with federal aid from the United States Department of Housing and Urban Development (HUD) under the Public Housing Program. Christensen Courts is a 72-unit apartment complex for elderly or disabled residents. Program participants contribute 30% of their monthly adjusted income towards rent.

Portneuf Towers - HACP manages Portneuf Towers, a 72-unit high-rise complex for elderly or disabled individuals and couples, under the Section 8 New Construction Program.

Reflections 5 - HACP also manages five other Section 8 New Construction properties called Reflections 5, consisting of El Rancho Heights, Franklin Heights, Hawthorne Terrace, Stockman Terrace, and Swisher Terrace. These are multi-family properties and have 2, 3, and 4-bedroom units. These properties do not

require age or disability as a qualifier.

Maple West and McKinley Manor - Unsubsidized Affordable Rentals

HACP manages two Multi-Family Section 236 apartment complexes: 56 units at McKinley Manor and 44 units at Maple West Apartments. Although there is no subsidy tied to these properties, Housing Alliance and Community Partnerships is bound by a contract with HUD to ensure that the rents at these properties remain affordable. Depending on a family's income, they may be given a basic rent rate or the market rent rate (as set by HUD). Utilities are included in these rent rates.

Open Market Rentals

Housing Alliance and Community Partnerships owns and manages apartment complexes (Pinewood, Kats Court, Railyard, Jefferson, 6th Ave, and 10th Ave.) that are open market rentals. This means no subsidy or HUD contract is tied to these properties. However, in keeping with the HACP mission to provide affordable housing, the rents at these complexes are still kept at a reasonably low level. The goal of Pinewood and Kats is to bridge the gap between families who are over income for other programs yet still struggle with high rents.

The Elms - Student Housing

The Elms is located at 2125 S 4th Ave and offers student housing for Idaho State University. Each apartment is four bedrooms & two bathrooms. Students can rent by the room, and HCAP can assign rooms or accommodate roommate requests.

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

City staff coordinates with HACP regularly. Both agencies are participants in Idaho's Region V Idaho Homelessness Coordinating Committee (IHCC). The City's projects do not specifically aim to address the needs of public housing residents. The City's projects aim to focus on efficiently and effectively providing services and support to low- to moderate-income residents. These initiatives also help assist public housing residents and residents who receive a HUD housing voucher. The City does coordinate with HACP to provide Fair Housing resources and other applicable training and education opportunities through its Planning & Administration funds.

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

The City of Pocatello's Housing Authority, Housing Alliance and Community Partnership (HACP), is a designated a Move to Work PHA. As such, HACP is able to expand its role with public housing residents to provide employment training, opportunities, and resources. In PY22 the City partnered with HACP to support eligible programming costs for the Move to Work public service. The program will provide a multi-year benefit to public housing residents to assist them in securing adequate employment which

Annual Action Plan

will eventually lead to homeownership. Similarly, HACP continues to offer resources to their clients to ensure residents understand Fair Housing Act requirements, have stable and secure rental housing, and gain financial literacy through various training and programs. HACP has a resident advisory board and has clients of its services on its operating board.

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

The PHA is not designated as troubled.

Discussion

The City does not own or manage any public housing and relies of HACP to provide those services to the community. The City works with HACP on various initiatives to coordinate and promote services and resources to the community.

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

Idaho Housing and Finance Association (IHFA) is the agency designated by the State to administer these funds to communities in Idaho not eligible to receive direct funding. The Continuum of Care plan funds are distributed through IHFA with input from regional coalitions. The City is not eligible as a recipient of other HUD funds, including HOME, ESG, or HOPWA.

IHFA administers the HUD Emergency Shelter and Supporting Housing Grant funds that benefit area homeless individuals and providers.

The City of Pocatello participates in the Southeast Idaho Homeless and Housing Coalition, a part of the Idaho Balance of State Continuum of Care under a Collaborative Agreement. As part of this collaboration, the South-Eastern Idaho Community Action Agency (SEICAA), Bannock Youth Foundation (BYF), Family Services Alliance (FSA), and Aid For Friends (AFF) continue to submit their applications for these other federal funds to the City's CDBG Advisory Committee for consistency review and comment, when required by the funders.

Describe the jurisdictions one-year goals and actions for reducing and ending homelessness including

Reaching out to homeless persons (especially unsheltered persons) and assessing their individual needs

The City does not currently receive other HUD funds, including HOME, ESG, or HOPWA. The City will continue to work with the local Continuum of Care (IHFA) and local partners to reach the local homeless population and assess their needs.

CDBG staff have consistently assisted with the Homeless Stand Down and the Point-in-Time Count. Each year, community partners host the Homeless Stand Down, which is for homeless and low-income residents in the community. This service provides one-stop assistance for needs ranging from flu shots to haircuts to foot treatment, plus a meal, winter coats, sleeping bags, boots, and other winter gear. Stand Down is an opportunity for attendees to make contact with those who can help and provides participating agencies with the information needed to ensure efforts are being directed to the most pressing needs.

The City has also worked with agencies doing the annual Point-in-Time Count, which helps determine

the number of people experiencing homelessness on a given day. This information allows the City to understand the level of homelessness in Pocatello and develop a program that better serves those in need. The City will continue to assist with this process in the upcoming program year.

Finally, through partnership with Aid for Friends, the City will provide funding for critical outreach activities including the PRT ticket program to address transportation needs for those homeless persons and Case Management services for homeless persons. The City will continue to use its partners to identify, understand, and support those experiencing homelessness (especially persons experiencing unsheltered homelessness) or at risk of homelessness with special needs in Pocatello.

Addressing the emergency shelter and transitional housing needs of homeless persons

The City of Pocatello has funded Aid for Friends for partial acquisition of a new public facility over five program years. Aid For Friends serves approximately 400 people annually (9,000-10,000 bed nights). The shelter operated in an 80-year-old structure. Because Aid For Friend's grant money from IHFA generally is used for client services, operational support of the shelter, and housing programs, using CDBG funding to assist with facility acquisition and services allows the use of AFF's other funding directly for those costs. In PY2019, CDBG funds were used to assist with architectural and engineering expenses for the new shelter, and in PY2024, funding will be allocated toward partial acquisition of the shelter site. This is year 5 of a five-year commitment between the City and Aid for Friends, for a total investment of \$250,000 in CDBG funds that annually results in acquisition in part of the shelter for AFF.

To address transitional needs, the City provides CDBG funding to Aid for Friends for services including transportation services via Pocatello Regional Transit (PRT) Tickets and individualized case management services. These are the only direct expenditures of CDBG funds for homeless persons; indirectly, the City's housing programs contribute to the prevention of homelessness by offering options for more affordable housing.

Helping homeless persons (especially chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth) make the transition to permanent housing and independent living, including shortening the period of time that individuals and families experience homelessness, facilitating access for homeless individuals and families to affordable housing units, and preventing individuals and families who were recently homeless from becoming homeless again

The City's efforts to support the transition of persons experiencing homelessness will be broad and

flexible so that service providers can adapt to clients' needs as economic and housing conditions change.

This support in PY2024 will include funding:

- Creation of affordable ownership housing,
- Emergency repairs and rehabilitation to preserve existing affordable housing and improve the housing conditions of existing low-income residents, and
- Supportive services are provided by nonprofit organizations that help stabilize residents at risk of and experiencing homelessness. These include but are not limited to emergency assistance, access to health services, access to food, and transportation assistance.

Helping low-income individuals and families avoid becoming homeless, especially extremely low-income individuals and families and those who are: being discharged from publicly funded institutions and systems of care (such as health care facilities, mental health facilities, foster care and other youth facilities, and corrections programs and institutions); or, receiving assistance from public or private agencies that address housing, health, social services, employment, education, or youth needs.

The City of Pocatello does not directly participate in the discharge planning or protocols for persons leaving publicly funded institutions or healthcare systems or receiving assistance from public and private agencies (health care facilities, foster care or other youth facilities, or correction programs and institutions).

All of the local agencies serving the homeless population work together to ensure that people receive the appropriate services. The agencies serving the homeless population maintain ties with institutions that release people from their care or custody, whether publicly or privately funded. For instance, the local hospital, Portneuf Medical Center, contacts Aid For Friends when releasing a patient that does not have housing. In 2018, Aid For Friends became the designated organization to be the community's single access point. This has helped individuals and families more efficiently gain access to needed services.

Discussion

One of the most remarkable aspects of homeless services in Pocatello is the ability for the services providers to work together to help support their clients through an exceptionally challenging point of time in their lives. The community has increased the availability of rapid rehousing services, emergency housing vouchers, foster youth initiatives, affordable student housing, public housing market-rate rentals, and behavioral health resources for children. Family Services Alliance, Aid for Friends, Bannock Youth Foundation, and Housing Alliance and Community Partnerships (HACP) collaborate to bring

needed resources and funding to Region 5.

The City does not specifically target persons with disabilities or other special needs for receiving services related to homelessness. The City will work with partners to better understand the scope of homelessness in Pocatello and what actions might be most beneficial for helping people transition into permanent housing. The Point-In-Time Count conducted by IHFA counts homelessness by Region 5 and does not provide specific data on the City of Pocatello. There is a general understanding that Pocatello may have a large percentage of homeless children, teenagers, and young adults.

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

Introduction:

Cost of construction and availability of contractors continues to be an issue for addressing the high demand for affordable housing. Although federal policies play an important role in influencing the availability of affordable housing, the supply of affordable housing depends less on federal policies than on local planning practices, policies, and community engagement (Sturtevant, HUD, PD&R Edge, "Regulatory Barriers and Affordable Housing Quarterly Update").

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

Annually, the City's governing bodies, namely the City Council, make a concerted effort to review many public policies, structures, fees, regulations, codes, and other provisions that may serve as barriers to affordable housing. The Council reviews the fee structure to ensure current rates do not inhibit development each fiscal year. Similarly, as projects move through the review process to Council approval, unintended barriers or potential issues that arise are reviewed by the Council and often included in the discussion for future review. The City's Planning and Development Services Department completed a new Comprehensive Plan which will serve as a long-term plan with actionable deliverables to address the City's future growth and development, including affordable housing needs. The City Council is committed to keeping the property tax level as low as possible. CDBG program customers are encouraged to take advantage of the Homeowner's Exemption and the Circuit Breaker Exemption to reduce the tax burden on low- and moderate-income households.

Comprehensive Plan 2040

The City of Pocatello recently adopted its new Comprehensive Plan: Our Valley | Our Vision. Comprehensive Plan 2040 is a 20-year plan that seeks to implement a vision for Pocatello and its people. It reflects the voice of residents and is the guiding document for shaping Pocatello's future. The vision, composed of seven vision elements, is the backbone of this plan. It knits together a set of long-term, integrated, and implementable goals and strategies. Through these vision elements and their associated goals and strategies, the Plan can be utilized as a citywide playbook that determines the City's priorities. The Plan provides a common language to connect the plans, policies, and programs of multiple City departments with the community's identified values.

While several of the vision elements address the negative effects of public policies, the Authentic & Affordable Neighborhoods vision element contains several goals to address barriers to affordable housing. The Vision Element primarily aims to achieve the following: In 2040, Pocatello neighborhoods

are affordable, complete, unique, and reflective of our city's history.

Goals of the vision element include:

- 1. Create Complete Neighborhoods by implementing development criteria informed by unique neighborhood plans.
- 2. Conduct intentional, equitable, and measurable neighborhood planning.
- 3. Create a Housing Plan that will provide guidance on housing needs for each neighborhood.
- 4. Assist those who are unhoused or otherwise in need to help prevent their involuntary displacement.
- 5. Develop form-based code standards to guide new development within each neighborhood.
- 6. Preserve the authenticity of Pocatello's neighborhoods and celebrate our history, architecture, and culture.

In addition to the Comprehensive Plan, the City is also updating its Zoning Code (Title 17) to improve on potential policy barriers to affordable housing development. This has been budgeted by the City Council and will occur over fiscal years 2024 and 2025, and include affordable housing study components.

Overall, the Comprehensive Plan, along with other programs and policies, aims to eliminate barriers to affordable housing and improve land use controls, tax policies, zoning ordinances, building codes, fees and charges, growth limitations, and policies affecting the return on residential investment.

Discussion:

Affordable housing impacts all levels of income and housing in Pocatello. As housing costs rise, it places additional financial stresses upon residents. In addition, market instability with increasing rental costs inhibits stable, secure, and affordable housing particularly for the most vulnerable populations. The City is working to improve on its processes and policies to address these barriers and issues.

AP-85 Other Actions – 91.220(k)

Introduction:

The City of Pocatello continues to remain involved in several efforts to address the needs of the underserved and promote efforts to coordinate the many components related to housing, suitable living environments, and promoting safer living environments.

Actions planned to address obstacles to meeting underserved needs

Primary obstacles to meeting PY23 goals included: delays caused by labor and supply shortages; lack of available contractors; lack of qualifying applicants; limited availability of resources; and delays in expending funds due to regulations or federal requirements. The City was able to accomplish several goals identified in PY23 but encountered issues plaguing many grantees. The property rehab programs experience delays due to lack of contractors because of a highly competitive construction market and lack of laborers. This results in delayed start for projects. In addition, residual effects from the COVID-19 supply chain shortages coupled with historically high inflation led to project cost increases which delayed some projects and depleted funds more quickly, resulting in fewer completed projects. Similarly, historically high rents resulted in fewer beneficiaries assisted by service programs. A reduction in the CDBG entitlement also meant less funding available for public service providers. Lastly, the federal regulatory requirements of the programs chilled participation in the CDBG programs and delayed the release of funds to Subrecipients. In particular, environmental regulations resulted in delays with home repair grant programs. Several applicants also did not meet the income criteria or were just above 80% AMI, thereby excluding them from the program. The documentation required resulted in fewer program participants due to the burdensome nature of program requirements. The City's entitlement was not announced until May 2023, a month after the start of the program year and 3 months after the normally anticipated funding announcement. The City's subsequent CAPER and PY23 AAP were not approved and the funding agreement not completed until July, shortening the timeframe during which Subrecipients could complete PY23 projects. The City prepares subrecipient agreements and the required reports so that it can quickly issue the funding once HUD releases the grant agreement, however, this still creates delays. To address obstacles, the City is working with its CPD rep to ensure plans are completed in a timely manner and ready to be administered as soon as funding is available. The City continues to work with contractors to establish relationships so they are willing to work on CDBG-funded projects. This includes packaging projects to make jobs more attractive as well as expediting payment and streamlining contract processes. In addition, the City is encouraging Subrecipients to leverage other funding sources to assist more beneficiaries and offers assistance in finding funding sources, such as through technical assistance. Consistent with previous years, strong local partnerships have been paramount to addressing obstacles to meeting underserved needs. The City has numerous local partners and continues to grow this cadre of organizations. Staff present on programs at meetings and meet one on one with potential service provider Subrecipients. In addition, CDBG staff attend local events regularly and present on the available programs offered by the City. Staff also serve as members of multiple community-based organizations and groups, providing information sharing and gathering.

Finally, the CDBG Advisory Committee holds monthly meetings to improve strategies for addressing obstacles. The CDBG Program's Policies and Procedures guide the program's work to address obstacles to underserved needs. The Language Assistance Plan was adopted to improve program accessibility for LEP individuals. In addition, the City ensures compliance with Section 3 when expending CDBG funds, adhering to the adopted policy. The program also references the Citizen Participation Plan to ensure depth of outreach. The City's broad base of partner agencies results in a robust referral system for those seeking assistance for whom CDBG funding is not an option.

Actions planned to foster and maintain affordable housing

The City will partner with local agencies to create more housing units for residents at 80% or less area median income (AMI). Specifically, the City will partner with local agencies to maintain its affordable housing stock through the rehabilitation programs. Further, the City's Lead Safe and Healthy Housing program will ensure current affordable housing is safe and livable, particularly for those families with children under 6 years of age. City staff will continue to assess the effect of city policies on affordable housing. Additionally, the City will work with other local agencies and non-profits to inform residents of their rights to access fair and affordable housing.

Actions planned to reduce lead-based paint hazards

The City will reduce lead-based paint hazards directly through property rehabilitation work. In PY24 the City has dedicated CDBG funding to support the City's Lead safe and Healthy Homes (LSHH) program. The City was awarded a grant for lead-hazard reduction through HUD's Office of Lead Hazard Control and Healthy Homes (OLHCHH) in 2021. As part of this grant, CDBG funds will match the OLHCHH award, leveraging the grant funds to remediate hazards in homes built before 1978 with children under the age of 6. In addition to those funds allocated as a match to the LSHH program, the City will continue to conduct its RENEWAL property rehab program which requires compliance with the Lead Safe Housing Rule. The City continues to offer educational materials on lead-based paint as well as provide outreach to several community groups.

Actions planned to reduce the number of poverty-level families

Housing - The City will help to ensure that low- to moderate-income residents will have safe and livable housing. Housing rehabilitation projects and emergency home repair ensure that residents most at risk of having deferred home maintenance and unsafe living environments can remain in their homes. The City will fund its internal RENEWAL home rehab grant and loan program. The City will continue to help ensure that low- and moderate-income residents have the opportunity to have housing that is free of lead-based paint. This will be accomplished primarily through the LSHH program match but also be incorporated into the RENEWAL home repair program. Improvement and preservation of the existing house stock is key to increasing the number of affordable housing units in Pocatello. Affordable and safe housing helps to provide financial stability, reduces the chances of a person becoming homeless, and

promotes housing sustainability.

Public Services - Projects will help low- to moderate-income residents with the impacts of domestic violence, homelessness, and other key community services. Specifically, in PY24, the City will support many types of services including: homelessness case management services, transportation for homeless persons, case management for persons with disabilities, nutrition programs for seniors, youth development programs, dental services for uninsured and underinsured persons, and subsistence payments for qualifying applicants. The focus will remain on ensuring that low- and moderate-income residents have the support they need to ensure their safety, access to affordable housing, and increased access to economic improvements, all to reduce the number of poverty-level families.

Public Infrastructure - Public Infrastructure Improvements will focus on safe and accessible infrastructure essential to the quality of life and building communities that support community diversity and stability. In general, public infrastructure improvements will include acquisition, construction, reconstruction, and installation of sidewalks particularly those leading to public transit stops and in LMA neighborhoods.

Public Facilities - Public Facilities and Improvements are publicly-owned facilities and infrastructure such as streets, playgrounds, underground utilities, and buildings owned by non-profits open to the general public. Safe and accessible infrastructure is essential to the quality of life and building communities that support community diversity and stability. The City will be supporting partial acquisition of the Aid for Friends Homeless Shelter, providing a safe, secure temporary location for those facing homelessness. This shelter will be a means to assist the target population and provide opportunities to move out of poverty.

Actions planned to develop institutional structure

The City bases its community delivery system on CDBG federal regulation, guidance, and the City's adopted CDBG Program Policies and Procedures. In its over 25-year history as an entitlement community, the City has developed many institutional structures inherent in the delivery system through internal operational procedures which ensure compliance. As Subrecipients administer programs, these requirements are reviewed by staff, contained in contract terms and conditions, and staff is made available to provide technical assistance to ensure compliance.

The City's Neighborhood and Community Services Division employs staff to implement the program who are required to complete training on CDBG programs and requirements to ensure compliance with federal regulations. In addition, the Neighborhood and Community Services Division is housed in the Planning and Development Services Department and works with the City's Finance Department to ensure continuity of the internal structure and cross-department checks and balances on program activities. The City's program is subject to City Council approval, with the CDBG Advisory Committee serving as the appointed body to make recommendations to the Council. A City Council member serves as a liaison to the CDBG Advisory Committee to foster communication on issues and keep the Council

Annual Action Plan

apprised of ongoing activity. Finally, the long-established relationships with community partners allow for frequent communication of issues, areas of success, and potential changes in institutional structure or service delivery.

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

The City provides technical assistance to service agencies interested in utilizing CDBG funding through the technical assistance meeting or individualized technical assistance offered on a case-by-case basis via in-person meetings, email, or phone communication. The City participates in the Housing and Homeless Coalition to stay apprised of public housing and service agency housing activity. Regarding private housing, the CDBG program is housed within the Planning and Development Services Department, so there is frequent communication about ongoing or planned developments. This is enhanced with monthly department meetings. The CDBG program goals and objectives are included in the City's Comprehensive Plan. The PDS Department is redoing the Comprehensive Plan and will be including actionable deliverables of which CDBG program goals and objectives will be reviewed and incorporated as applicable. Staff maintains open lines of communication so that partners can share project updates, and CDBG priorities can be shared externally. Overall, the City will continue its participation in various coalitions and work to address housing needs by leveraging opportunities for coordination amongst the various public and private entities.

Discussion:

The City will continue to engage with local stakeholders to ensure CDBG funds are utilized for the most significant community benefit. This strategy allows the City to assess the most pressing community needs and program successes continually.

Program Specific Requirements

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

Introduction:

The City plans to address priority needs through a variety of activities that meet the established project goals for public facilities, public infrastructure, public services, housing, and administration. The City will rely primarily on CDBG entitlement funding and anticipates program income of about \$25,000 to assist with completion of these activities. The City expends program income on eligible CDBG activities as soon as it is receipted into the City, so it does not anticipate a large carry-forward from the previous PY22. The City does not have any section 108 loan guarantees, surplus funds from urban renewal settlements, returned funds, or income from float-funded activities. Overall, all activities will meet the Low/Moderate Income National Objective, as the City will not conduct any activities under Slum/Blight or Urgent Need.

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.	C
3. The amount of surplus funds from urban renewal settlements	C
4. The amount of any grant funds returned to the line of credit for which the planned use has no	t
been included in a prior statement or plan	0
5. The amount of income from float-funded activities	C
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. 10	0.00%