

Executive Summary

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

1. Introduction

In this fourth year of the 2023-2027 Consolidated Plan, the City continues to prioritize funding activities with the highest needs according to the data and outreach collected during the Consolidated Plan update process. The City's CDBG Program Annual Action Plan features a range of activities, each intended to respond to the City's needs through economic development and affordable housing preservation to support low- and moderate-income populations. The City has placed a special emphasis on supporting the needs of our community through committing the majority of our funding to housing preservation activities. The PY2026 projects are as follows:

Rebuilding Together Thurston County	Critical Home Repair	\$84,077
Enterprise for Equity	Microenterprise Assistance	\$84,077
South Puget Sound Habitat for Humanity	Critical Home Repair	\$84,077
South Puget Sound Habitat for Humanity	Energize Thurston	\$84,077
City of Olympia	Planning & Administration	\$75,283
City of Olympia	Rental Rehabilitation Program	\$250,000

Table 1 - Program Year 2026 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.

CDBG funding for PY26 activities is estimated to achieve the following accomplishments:

- Rehabilitation of 20-30 single family homes for low- and moderate-income homeowners
- 15-30 small businesses receiving technical assistance

In accordance with the priorities identified in the Consolidated Plan, the majority of our programmatic funding available is being recommended for activities related to the creation and preservation of affordable housing.

3. Evaluation of past performance

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

The City's CDBG program has made great strides to meet goals set up in past Annual Action Plans and Consolidated Plans.

The City's CDBG program is consistently timely with its spenddown and continues to provide technical assistance to subrecipients to build capacity in administering CDBG funding. Local service providers continue to expand capacity to reach more LMI households in the community. Performance measures related to housing activities have increased dramatically over the past five-year Consolidated Plan.

4. Summary of Citizen Participation Process and consultation process

Summary from citizen participation section of plan.

The City will present at the Regional Housing Council's Affordable Housing Advisory Board on June 18th. The City presented at the Community Livability and Public Safety Committee on May 27th. There is a 30-day public comment period open June 8th - July 9th. A public hearing will be held at the regular City Council meeting June 23rd.

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.

To be updated

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

To be updated

7. Summary

The City continues to target CDBG funding towards priorities set in the Consolidated Plan.

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

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

The following are the agencies/entities 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	Olympia	
CDBG Administrator	Olympia	Community Planning and Economic Development
HOPWA Administrator		
HOME Administrator		
HOPWA-C Administrator		

Table 2 – Responsible Agencies

Narrative

Consolidated Plan Public Contact Information

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

1. Introduction

The City consulted with a variety of stakeholders and constituents during the 2023-2027 Consolidated Plan update. Each Annual Action Plan during this period will reflect the findings of the outreach and research in the Consolidated Plan. In development of the Annual Action Plan, City housing staff regularly participate in Regional Housing Council meetings and discuss priority housing needs in the community. City staff also participate in the regional Housing Action Team, a group of housing providers and government employees to discuss capacity building and services needed for LMI residents.

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

The City’s participation in these coordinating bodies allowed the City to receive valuable input from a broad range of service providers.

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 Thurston County Continuum of Care (COC) is the body that addresses the needs of homeless people in all populations. The COC is also directly aligned with Coordinated Entry Team that engages in an ongoing system improvement work to seek, develop and adopt best practices for serving homeless people. City staff meets with the COC regularly to ensure goals are aligned and efforts to address homelessness are compounded but not duplicated. The housing projects funded this program year are directly targeted to prevent housing insecurity and meet the goals of the COC.

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

The Thurston Thrives Coordination Council works directly with the Regional Housing Council to develop recommendations on how best to invest all state and local funds including ESG funds. The TTCC also works closely with the Coordinated Entry Team to strengthen HMIS administration and reporting.

2. Agencies, groups, organizations and others who participated in the process and consultations

Table 3 – Agencies, groups, organizations who participated

1	Agency/Group/Organization	Thurston County Continuum of Care
	Agency/Group/Organization Type	Housing PHA Services - Housing Services-Children Services-Elderly Persons Services-Persons with Disabilities Services-Persons with HIV/AIDS Services-Victims of Domestic Violence Services-homeless Services-Health Services-Education Services-Employment Service-Fair Housing Services - Victims Health Agency Child Welfare Agency Other government - Federal Other government - State Other government - County Other government - Local Regional organization Planning organization

<p>What section of the Plan was addressed by Consultation?</p>	<p>Housing Need Assessment Public Housing Needs Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Homelessness Strategy Non-Homeless Special Needs HOPWA Strategy Market Analysis Economic Development Anti-poverty Strategy Lead-based Paint Strategy</p>
<p>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</p>	<p>The City works closely with the continuum of care for priority needs in the community.</p>

2	Agency/Group/Organization	Regional Housing Council
	Agency/Group/Organization Type	Housing PHA Services - Housing Services-Children Services-Elderly Persons Services-Persons with Disabilities Services-Persons with HIV/AIDS Services-Victims of Domestic Violence Services-homeless Services-Health Services-Education Services-Employment Service-Fair Housing Services - Victims Services - Broadband Internet Service Providers Services - Narrowing the Digital Divide Health Agency Child Welfare Agency Publicly Funded Institution/System of Care Other government - Federal Other government - State Other government - County Other government - Local Regional organization Planning organization Civic Leaders

<p>What section of the Plan was addressed by Consultation?</p>	<p>Housing Need Assessment Public Housing Needs Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Homelessness Strategy Non-Homeless Special Needs HOPWA Strategy Market Analysis Economic Development Anti-poverty Strategy Lead-based Paint Strategy</p>
<p>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</p>	<p>The City participated in strategic regional policy to help coordinate public funding.</p>
<p>3 Agency/Group/Organization</p>	<p>Thurston Regional Planning Council</p>
<p>Agency/Group/Organization Type</p>	<p>Services - Broadband Internet Service Providers Services - Narrowing the Digital Divide Other government - State Other government - County Other government - Local</p>
<p>What section of the Plan was addressed by Consultation?</p>	<p>Broadband service providers strategy</p>
<p>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</p>	<p>TRPC was consulted during the Consolidated Plan process to strategize broadband services.</p>

4	Agency/Group/Organization	HOUSING AUTHORITY OF THURSTON COUNTY
	Agency/Group/Organization Type	Housing PHA
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Public Housing Needs Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Homelessness Strategy Non-Homeless Special Needs Market Analysis
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	The Housing Authority was consulted during the Consolidated Plan process to provide housing market data, public housing data, review of inventory and housing vouchers, and to help identify the priority needs and goals for the Consolidated Plan.

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

N/A

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	Thurston County	Each plan emphasizes the inter-relationship of housing, shelter, supportive services and economic opportunity for all low- and moderate-income people.

Table 4 - Other local / regional / federal planning efforts

Narrative

City staff continue to follow the priorities and needs identified in the Consolidated Plan. The consultation process for the Consolidated Plan update and creation of the Annual Action Plan has been extensive. City staff have worked alongside County staff and consultants in order to collect data that accurately reflects the needs of our community.

AP-12 Participation - 91.401, 91.105, 91.200(c)

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

The Annual Action Plan has a 30-day public comment period, a Public Hearing, a briefing at the community Affordable Housing Advisory Board, and funding recommendations at the City's Community Livability and Public Safety committee. Goal-setting has been influenced by the Consolidated Plan update for 2023-2027.

Citizen Participation Outreach

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

Table 5 – Citizen Participation Outreach

Expected Resources

AP-15 Expected Resources - 91.420(b), 91.220(c)(1,2)

Introduction

The City has made a great effort in expending prior program year unspent funds and is now timely in its expenditures and continues to meet performance measure timelines and project milestones with all subrecipients. The City is dissolving the Revolving Loan Fund to incorporate all Program Income to activities identified in the Annual Action Plan

Anticipated Resources

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
CDBG	public - federal	Acquisition Admin and Planning Economic Development Housing Public Improvements Public Services	376,415.00	285,176.00	0.00	661,591.00	376,415.00	The City's PY26 entitlement award is identified for projects as well as \$35,176 in program income formerly attributed to the revolving loan fund. \$250,000 of program income is for the remaining project funded by the revolving loan fund for a rental rehabilitation project.

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

All housing related projects outlined in the Annual Action Plan are being partially funded with PY26 CDBG funding. The subrecipients will be contributing staff time, resources, and materials to complete the agreed upon projects. Neither the City nor the organizations could have completed these goals independently of one another. The partnering agencies will be seeking outside donations and/or other state and local funds to fill the budget gaps to serve low/mod income homeowners and renters. Additionally, CDBG funds are used to leverage state funding for the Energize Thurston campaign.

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

N/A

Discussion

The City will pursue all potential leverage to ensure maximum leverage of local, state and federal funding sources.

Annual Goals and Objectives

AP-20 Annual Goals and Objectives - 91.420, 91.220(c)(3)&(e)

Goals Summary Information

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
1	Preserve and Improve Existing Affordable Housing	2023	2027	Affordable Housing Homeless Non-Homeless Special Needs	City of Olympia	Housing	CDBG: \$502,231.00	Homeowner Housing Rehabilitated: 30 Household Housing Unit Rental housing rehabilitated: 12 household housing units
2	Improve Housing and Economic Outcomes	2023	2027	Homeless Non-Homeless Special Needs	City of Olympia	Community and Economic Development Services Special Needs	CDBG: \$84,077.00	Businesses assisted: 30 Businesses Assisted

Table 7 – Goals Summary

Goal Descriptions

1	Goal Name	Preserve and Improve Existing Affordable Housing
	Goal Description	

2	Goal Name	Improve Housing and Economic Outcomes
	Goal Description	

AP-35 Projects - 91.420, 91.220(d)

Introduction

The City prioritizes housing rehabilitation and preservation. Additionally, the City is funding one economic development activity.

#	Project Name
1	Housing Preservation and Rehabilitation
2	Economic Development
3	Planning and Administration

Table 8 – Project Information

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

Allocation priorities align with needs identified in the Consolidated Plan.

AP-38 Project Summary

Project Summary Information

#	Project Name
1	Housing Preservation and Rehabilitation
2	Economic Development
3	Planning and Administration

1	Project Name	Housing Preservation and Rehabilitation
	Target Area	City of Olympia
	Goals Supported	Preserve and Improve Existing Affordable Housing
	Needs Addressed	Housing Special Needs
	Funding	CDBG: \$502,231.00
	Description	Rehabilitation and preservation activities carried out by subrecipient partners. Partners include Rebuilding Together Thurston County and South Puget Sound Habitat for Humanity. Rehabilitation also includes rental rehabilitation program by City of Olympia.
	Target Date	8/31/2027
	Estimate the number and type of families that will benefit from the proposed activities	An estimated 30-40 homeowner households will receive benefit from the proposed activities. 12 rental households will receive benefit from the rproposed activities.
	Location Description	Activities will take place throughout the City's jurisdiction.
	Planned Activities	Critical Home Repair programs administrated by Rebuilding Together Thurston County and South Puget Sound Habitat for Humanity. Energize Thurston administered by South Puget Sound Habitat for Humanity. Rental rehabilitation program administered by the City of Olympia.
2	Project Name	Economic Development
	Target Area	City of Olympia
	Goals Supported	Improve Housing and Economic Outcomes
	Needs Addressed	Community and Economic Development
	Funding	CDBG: \$84,077.00
	Description	Economic development activities to support low- and moderate-income businessowners in Olympia.
	Target Date	8/31/2027
	Estimate the number and type of families that will benefit from the proposed activities	Approximately 30-40 businesses will be assisted through Enterprise for Equity's microenterprise assistance programs.
	Location Description	Small businesses throughout the City's jurisdiction.

	Planned Activities	Enterprise for Equity's Microenterprise Assistance program
3	Project Name	Planning and Administration
	Target Area	City of Olympia
	Goals Supported	Preserve and Improve Existing Affordable Housing Improve Housing and Economic Outcomes
	Needs Addressed	Housing Community and Economic Development Services
	Funding	CDBG: \$75,283.00
	Description	Planning and administration costs
	Target Date	8/31/2027
	Estimate the number and type of families that will benefit from the proposed activities	N/A
	Location Description	Olympia
	Planned Activities	Planning and administration costs for the CDBG program.

AP-50 Geographic Distribution - 91.420, 91.220(f)

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

Geographic Distribution

Target Area	Percentage of Funds
City of Olympia	100

Table 9 - Geographic Distribution

Rationale for the priorities for allocating investments geographically

Services are provided throughout the entitlement community. Homeowner rehabilitation is prioritized in low-income census tracts and those with minority concentrations according to City and HUD GIS mapping tools.

Discussion

The City continues to work on updating GIS systems to reflect underserved and overrepresented communities in poverty. The City is considering undertaking a local income survey to collect better data on what census tracts are most vulnerable.

AP-75 Barriers to affordable housing -91.420, 91.220(j)

Introduction

The City of Olympia has made great strides in confronting barriers to producing and preserving multi-family rental units but more work is needed to produce homeownership units and to remove barriers that low-income households face in accessing those units. Increasing homeownership provides a unique opportunity to equitably provide affordable, sustainable, healthy and safe housing while assisting low and moderate-income households to begin building wealth and exiting poverty. The three key barriers to homeownership that still exist are the reduced organizational capacity of housing developers to create new homeownership housing, insufficient availability of financing and subsidies needed to produce new housing, and insufficient availability of resources needed to purchase a house. These barriers are present in Olympia but also seen statewide and have been called out in Homestead Community Land Trust's Closed Doors report, the Black Home Initiative, and the State's Homeownership Disparities Work Group study.

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

In recent years the City of Olympia has taken several actions to address and mitigate barriers to affordable housing production and preservation. Some of these measures are briefly described below.

1. Dedicated Funding Source:

In 2018, voters approved a ballot measure that created the Home Fund, a local funding source that is solely used for the construction and preservation of housing units affordable to Olympia residents whose incomes do not exceed 60% of area median income by household size. The funding originates from the collection of one-tenth of one percent sales and use tax. Until 2023, funding awards were made by an Olympia Home Fund board comprised of residents with knowledge and expertise in the affordable housing field. From 2018 through 2022, Olympia's Home Fund supported the creation of approximately 130 permanent rental units.

In 2022, Thurston County adopted its own Home Fund and in 2023, the Olympia and Thurston County Home Funds were merged, thereby creating a local funding mechanism that offers an anticipated \$8 million annually toward the construction and preservation of affordable

housing in Thurston County. In 2023, seven projects that will produce 137 new units of housing by 2027 were awarded funds.

Funding awards for the newly merged Home Fund are now recommended by a citizen advisory board known as the Thurston Affordable Housing Advisory Board. The board is comprised of residents of Olympia, Lacey, Tumwater, and Yelm. Board members have a wide range of expertise in the affordable housing field. In establishing the board, priority was placed on including board members with lived experience of homelessness or housing insecurity. Priority was also placed on individuals who represent a population which is overly represented in Thurston County's Homeless Crisis Response Plan. Examples of such populations are Black, Hispanic, and LGBTQIA+.

2. Housing Action Plan

The cities of Olympia, Lacey, and Tumwater partnered with Thurston Regional Planning Council (TRPC) in 2021 to create Housing Action Plans. Because the cities are so closely geographically located and operate within the same housing market constraints, the decision was made for each city's plan to include the same six strategies for increasing the production and preservation of affordable housing. The strategies are:

- Increase the supply of permanently affordable housing for households that make 80 percent or less of the area median income.
- Make it easier for households to access housing and stay housed.
- Expand the overall housing supply by making it easier to build all types of housing projects.
- Increase the variety of housing choices.
- Continually build on resources, collaboration, and public understanding to improve implementation of housing strategies.
- Establish a permanent source of funding for low-income housing.

Cities then individually identified several actions their jurisdiction would take to support these six broad strategies. The City of Olympia's Housing Action Plan includes 71 actions. Staff across the organization recognize the need for affordable housing and work collaboratively to carry out the Housing Action Plan.

The City applied for the PRO Housing grant opportunity from HUD in 2023 and 2024 to address barriers to affordable housing. While

unsuccessful in our application, we intend to apply for any future funding opportunities.

Discussion

The City of Olympia has extensively gathered and analyzed data and engaged our residents to assess the community's housing needs. The City pursued a Missing Middle Initiative, an effort to increase housing production and range of housing options by allowing more than one housing unit per lot. The City engaged Olympians on the issue of homelessness and from the engagement emerged the One Community plan, a roadmap for addressing homelessness. A Housing Needs Assessment identified, among other things, the need for more housing production and preservation and a need for a range of housing types to meet current and anticipated demand. The 2023-2027 Consolidated Plan deepened our knowledge about housing need and instability in Olympia. It provided data on the cost to produce and preserve housing as well as data on housing cost burden. The Assessment of Fair Housing highlighted populations of our community who experience barriers to accessing housing, housing insecurity, housing cost burden and ongoing disparities in homeownership.

AP-85 Other Actions - 91.420, 91.220(k)

Introduction

The City, through non-profit agencies supported with state funding will continue its outreach particularly to homeless individuals and families to connect them to employment and education opportunities through the variety of programs that are available in the community.

The City will continue its efforts in creating effective partnerships with service delivery agencies and other jurisdictions within its boundaries to implement countywide programs and activities that strengthen our capacity to address the needs of low-income households.

Actions planned to address obstacles to meeting underserved needs

The City through the funded non-profit agencies will continue its outreach particularly to homeless individuals and families to connect them to employment and education opportunities through the variety of programs that are available in the community. The City is also actively pursuing state and federal funding to address obstacles to affordable housing.

Actions planned to foster and maintain affordable housing

The City prioritizes using CDBG funding to preserve existing affordable housing. Staff are continuously looking for funding sources to leverage CDBG and create new affordable housing.

Actions planned to reduce lead-based paint hazards

The City will continue its efforts in creating effective partnerships with service delivery agencies and other jurisdictions within its boundaries to implement countywide programs and activities that strengthen our capacity to address the needs of low-income households.

The City, through the Housing Action Team and Regional Housing Council, will continue to create partnerships for the ongoing development of affordable housing in our community. A working group of the Housing Action Team is the Affordable Housing Team, which is comprised of local affordable housing providers, local jurisdiction staff, and other interested private sector parties. The group works to focus collaborative action to create, preserve and diversify affordable and equitable housing through advocacy, education, and leadership.

City staff are researching capacity and availability for a HUD lead reduction grant.

Actions planned to reduce the number of poverty-level families

The Regional Housing Council (RHC), representing the jurisdictions of Thurston County, Olympia, Lacey,

Tumwater, and Yelm all pledge a portion of local sales tax revenue collected by the jurisdictions to support health and human services agencies throughout the County. For the past several years, the RHC has directed these funds to be used to fund local non-profit agencies that address "basic needs" including food and meal programs, personal hygiene, childcare, and other emergency needs to support low-income households.

Actions planned to develop institutional structure

In January 2021, Thurston County and the Cities of Olympia, Lacey, Tumwater, and Yelm, signed an Interlocal Agreement to form the Regional Housing Council (RHC). The RHC replaces the Health and Human Services Council and creates a more intentional focus on addressing affordable housing and homelessness as a region. The primary purpose of the RHC is to leverage resources and partnerships through policies and projects that promote equitable access to safe and affordable housing.

The Thurston Thrives Housing Action Team and its sub teams, including Affordable Housing; Homeless Housing Hub; Affordable Rental Housing; Manufactured Housing Work Group; and Senior Housing, will continue to build new partnerships to enhance our planning environment. These teams provide valuable information to our local planning bodies regarding the development of affordable housing and needed public services.

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

The Housing Action Team is again the key county focus on the activities in this area. The HAT forum brings together non-profits, government and private sector developers in a unique manner that solicits input for the greater community wellbeing.

Discussion

The City will continue to solicit the input from existing community members, local not for profit agencies and private sector businesses to create a stronger, healthier community.

Program Specific Requirements

AP-90 Program Specific Requirements - 91.420, 91.220(I)(1,2,4)

Introduction

The City continues to use its CDBG funding to benefit low- and moderate-income community members. The City utilizes contingency projects to avoid program income not being allocated to any projects.

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

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

1. The total amount of program income that will have been received before the start of the next program year and that has not yet been reprogrammed	0
2. The amount of proceeds from section 108 loan guarantees that will be used during the year to address the priority needs and specific objectives identified in the grantee's strategic plan.	0
3. The amount of surplus funds from urban renewal settlements	0
4. The amount of any grant funds returned to the line of credit for which the planned use has not been included in a prior statement or plan	0
5. The amount of income from float-funded activities	0
Total Program Income:	0

Other CDBG Requirements

1. The amount of urgent need activities	0
2. The estimated percentage of CDBG funds that will be used for activities that benefit persons of low and moderate income. Overall Benefit - A consecutive period of one, two or three years may be used to determine that a minimum overall benefit of 70% of CDBG funds is used to benefit persons of low and moderate income. Specify the years covered that include this Annual Action Plan.	100.00%

Discussion

The overall benefit period for this Annual Action Plan is 2024, 2025, 2026.