RESOLUTION NO. 6492

A RESOLUTION ADOPTING THE CITY OF ALBANY'S 2016-2017 ACTION PLAN FOR COMMUNITY DEVELOPMENT BLOCK GRANT PROGRAMS AS REQUIRED BY THE U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT

WHEREAS, the City of Albany is entitled to annual Community Development Block Grant (CDBG) funding provided by U.S. Department of Housing and Urban Development (HUD) to develop viable urban communities by providing decent housing, a suitable living environment, and by expanding economic opportunities, principally for low- and moderate-income persons; and

WHEREAS, the City assessed the City's community development needs and then set goals and priorities to address those needs in a five-year Consolidated Plan for Fiscal Years 2013 through 2017; and

WHEREAS, the City is required to develop an Annual Action Plan that describes the actions, activities, and programs that will be delivered to address priority needs and goals identified in the Consolidated Plan; and

WHEREAS, the City of Albany Community Development Commission and staff sought public input through public meetings and outreach to local agencies to identify activities to be carried out in FY 2016-2017 to address the needs identified in the Consolidated Plan; and

WHEREAS, the City of Albany public comment period on the 2016-2017 Action Plan was March 28, 2016, to April 27, 2016 and City Council public hearing was April 27, 2016; all public comments were accepted and considered; and

WHEREAS, the FY 2016-2017 Action Plan identifies the following activities to be carried out with FY 2016-2017 CDBG funds: revitalizing public facilities in low-income neighborhoods, removing barriers to accessibility, rehabilitating affordable housing, providing public services and economic opportunities for the City's low- and moderate-income persons, and furthering fair housing.

NOW, THEREFORE, BE IT RESOLVED that the Albany City Council adopts the FY 2016-2017 Action Plan, a copy of which is attached hereto as "Exhibit A."

DATED AND EFFECTIVE THIS 27th DAY OF April 2016.

Mary A- tribble
City Clerk

Mayor

ATTEST:



CITY OF ALBANY

2016-2017 ACTION PLAN

FOR THE 2016 FEDERAL PROGRAM YEAR

YEAR FOUR OF THE 2013-2017 CONSOLIDATED PLAN

FOR THE CITY OF ALBANY

COMMUNITY DEVELOPMENT BLOCK GRANT PROGRAMS

ADOPTED BY	RESOLUTION
	, 2016

PREPARED BY THE CITY OF ALBANY, OREGON COMMUNITY DEVELOPMENT DEPARTMENT

Acknowledgements

Albany Community Development Commission

Nathan Brown

Karen Cardosa

Iris Carrasco

Tara Dixson (Vice Chair)

Chris Equinoa

Terry Knoll

Sharon Konopa (Mayor)

Dick Olsen

Daniel Sullivan

Joann Zimmer (Chair)

Albany City Council

Bill Coburn

Floyd Collins

Bessie Johnson

Rich Kellum

Sharon Konopa (Mayor)

Ray Kopczynski

Dick Olsen

Albany City Staff

Anne Catlin, Planner III

Bob Richardson, Planning Manager

Jeff Blaine, Public Works Engineering and Community Development Director

Table of Contents

Annual Action Plan for Fiscal Year 2016-2017

Acknov	wledgements	1
AP-05	Executive Summary - (24 CFR 91.200(c), 91.220(b))	1
1.	Introduction	1
2.	Summary of the objectives and outcomes identified in the Action Plan	1
3.	Evaluation of past performance.	2
4.	Summary of citizen participation process and consultation process (AP-12, 91.105, 91.200(c))	3
5.	Summary of public comments received	4
6.	Summary of comments or views not accepted and the reasons for not accepting them	4
7.	Conclusions	4
PR-05	Lead and Responsible Agencies – 91.200(b)	5
AP-10	Consultation – 91.100, 91.200(b), 91.215(l)	6
AP-12	Citizen Participation	11
AP-15	Expected Resources	12
AP-20	, 2016-2017 Annual Goals and Projects	13
AP-35	Projects – 91.220(d)	14
AP-38	Project Summary	15
AP-50	Geographic Distribution	17
AP-55	Affordable Housing	19
AP-65	Homeless and Other Special Needs Activities – 91.220(i)	20
AP-75	Barriers to Affordable Housing (CFR 91.220(j))	22
AP-85	Other Actions– 91.220(k)	23
ΔΡ-90) Program Specific Requirements	25

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

1. Introduction

The City of Albany is an entitlement jurisdiction receiving a federal formula grant from the U.S. Department of Housing and Urban Development (HUD) through the Community Development Block Grant (CDBG) program. The purpose of the CDBG program is to provide decent housing, a suitable living environment, and to expand economic opportunities, primarily for low- and moderate-income residents.

All CDBG-funded activities must meet one of three HUD-defined National Objectives:

- Benefit to low- and moderate-income (LMI) persons;
- Aid in the prevention or elimination of slums or blight; and
- Meet urgent needs to alleviate emergency conditions.

CDBG statutes require recipients to spend 70 percent of all CDBG funds to benefit LMI persons. In addition, CDBG program activities, when considered as a whole, must not benefit moderate-income persons (those earning 50 to 80 percent of the median income) to the exclusion of low-income persons (residents earning less than 50 percent of the median income).

A five-year Consolidated Plan is required by the CDBG program to establish the vision for housing, community, and economic development priorities and creates the opportunity for strategic planning and citizen participation to take place in a comprehensive context. It outlines how the City will target CDBG funds to address the highest needs. Each jurisdiction's plan must state how it will pursue the CDBG statutory program goals and must report on progress meeting program goals.

Each year, entitlement jurisdictions must submit an Action Plan to HUD that describes the specific planned uses for CDBG funding and how program requirements will be satisfied.

2. Summary of the objectives and outcomes identified in the Action Plan

The City is preparing its fourth annual Action Plan to address needs identified in the 2013-17 Consolidated Plan, Albany's first five-year plan. The 2016-17 Action Plan objectives and outcomes were developed through citizen participation over the past year and an assessment of needs identified in the 2013-17 Consolidated Plan. Albany's Consolidated Plan goals and objectives were developed through the *Needs Assessment*, data analysis and evaluation, consultations with area agencies, and citizen input.

The City proposes to use 2016 entitlement funds in fiscal year (FY) 2016-17 to remove blighting influences in target neighborhoods, remove barriers to accessibility, reduce homelessness, provide public services, and expand economic opportunities for Albany's low- and moderate-income residents. The City will prepare an updated fair housing assessment and provide fair housing education and monitoring.

The 2016-17 Action Plan objectives and outcomes are further described below.

Decent Housing

- Reduce homelessness. Reduce homelessness through shelter services, case management, and mentoring to at least 30 of Albany's homeless and at-risk youth.
- Further fair housing. The City will prepare a fair housing assessment and will do additional analysis of Albany's socio-economic demographics by area. The City will increase awareness of fair housing laws by providing training to residents and/or property managers. The City will help residents access fair housing resources and will evaluate housing advertisements for potential fair housing violations.
- Improve the quality and livability of Albany's affordable housing stock. Prior year CDBG funds will continue the Albany housing rehabilitation programs for Albany's low- and moderate-income households.

Suitable Living Environment

- Remove blighting influences in LMI target areas. The City will complete public facility improvements in Census Tract 208 to include remodeling Sunrise Park, installing infill sidewalk and curb ramps, removing barriers to accessibility, and improving pedestrian safety, especially along routes to schools. Approximately 1,000 residents will benefit from these improvements.
- Remove barriers to accessibility. Improve accessibility and a suitable living environment by installing accessible curb ramps in LMI Census Tracts 204 and 208. These improvements will benefit at least 300 area residents, including a large percentage of school-aged children going to and from school.
- Support public service agencies that work to improve the lives of Albany's special needs and low-income populations. Support the home-based infant intervention program that will work with 15 low-income families to provide parenting skills to prevent child abuse and foster care placements (40 residents).

Expanded Economic Opportunities

- Increase economic opportunities for Albany's LMI residents
 - 1. Provide jobs skills training, application and résumé assistance, and job placement assistance to help 25 homeless or chronically homeless get jobs.
 - 2. Prior year CDBG funds will continue to support the development of Albany's microenterprises and small business through training and technical assistance.
 - 3. Small grants to small businesses for LMI job creation will be available using prior year CDBG funds.

3. Evaluation of past performance.

The City of Albany submitted its second Consolidated Annual Performance and Evaluation Report (CAPER) to HUD in September 2015. The following list reports performance on the City's progress meeting its Consolidated Plan and Action Plan objectives:

Decent Housing

 Reduce the Number of Homeless Residents: CDBG funds were granted for two acquisition projects that added six supportive housing beds and ten shelter beds. Funds were also granted to help more than 300 Albany residents with a variety of public services including outreach and case management to at-risk youth, shelter and case management for homeless women with children, and services to reduce the number of homeless and abused children. Emergency housing assistance has been provided to 10 households to date.

- Improve the Quality of Affordable Housing: The City provided no-interest deferred loans to four owner-occupied households for housing rehabilitation located in Albany's target area Census Tracts 204 and 208. Due to declining interest in loans and meeting loan requirements, the program was changed to offer grants for housing rehabilitation when paired with free weatherization services. Three owner-occupied and two rental housing rehabilitation applications are being processed.
- Further Fair Housing: Since the beginning of the Consolidated Plan, the City has provided fair housing training for tenants and landlords and has sponsored code compliance and crime prevention training. The City also helped to host a forum and discussion on the history of housing discrimination in Oregon. According to reports provided by the Fair Housing Council of Oregon, no fair housing cases were opened in FY 2013-14; four bona fide allegations were reported in FY 2014-15, but all cases have been closed.

Suitable Living Environment

- Remove Barriers to Accessibility: The City repaired 1,200 linear feet of a pedestrian multi-use path, Periwinkle Path. Planning and engineering are complete for installing curb ramps along another popular City walking route and path as well as infill sidewalks and curb ramps in Albany's low-income target areas.
- Eliminate Blighting Influences in Low- and Moderate-Income Neighborhoods: CDBG funds from the first two program years were allocated to remove blighting influences at Sunrise Park. Park facilities and equipment are frequently vandalized and the park is a location for illegal activities. Facility improvements include all new park equipment and amenities, new lighting, paths, and a parking lot. When the park project expanded in scope to add a parking lot, wetlands were identified during the environmental review process. The wetland permitting process is underway but has caused substantial delays to this project. The project is expected to be completed in 2016.
- Increase Economic Opportunities: Through June 30, 2016, 40 low-income Albany residents have enrolled in microenterprise or small-business training or received free advising; including 11 Spanish-speaking residents. Small grants for job creation were awarded to three microenterprises. These programs have created 11 new jobs for low- and moderate-income (LMI) residents. Public services funds also provided jobs skilling training for 10 of Albany's young adults through a partnership with Youthbuild. Youthbuild is a comprehensive program designed to provide apprentice-like opportunities for young men and women ages 17 to 24 years old.

4. Summary of citizen participation process and consultation process (AP-12, 91.105, 91.200(c))

The City held semi-annual public hearings in conformance with federal regulations and Albany's Citizen Participation Plan. The hearings provided an opportunity to gain public input on community development needs that can be addressed with eligible CDBG activities, the City's performance on

the use of CDBG funds, and the City's Consolidated Annual Performance and Evaluation Report (the CAPER).

The City and Community Development Commissioners (CDC) gathered input on community needs through monthly meetings and outreach with local agencies. The CDC also solicited and evaluated applications for public services and economic development projects.

The draft 2016-17 Action Plan was posted on the City's Website on March 28, 2016, and was available at Albany City Hall and both of Albany's public libraries. [See AP-12 Citizen Participation for more detailed information.]

5. Summary of public comments received

Comments received on needed services from local public service agencies through presentations, applications, and grant reports:

- Case management and shelter services for homeless and unaccompanied youth
- Infant child-abuse prevention services including parenting classes and visits
- Employment coordinator position is needed at a local shelter to help homeless guests with job skills training, life skills, education, résumés, interviewing, completing applications, and more in order to successfully re-enter the workforce
- Youthbuild job skills training is needed to help young adults get training and education that will enable them to get jobs in construction-related industries
- Court-appointed special advocates for children to prevent children from going into foster care

The City has received numerous comments over the past few years regarding the need to remodel Sunrise Park in order to remove blighted and unsafe conditions at the park and improve neighborhood safety and livability. Residents also identified locations where infill sidewalks and/or curb ramps are needed in Census Tracts 204 and 208.

Comments received during the 30-day public comment period and the public hearings:

- None to date.
- City Council April 27, 2016, Hearing Testimony: To be completed following the hearing.

6. Summary of comments or views not accepted and the reasons for not accepting them None.

7. Conclusions

The FY 2016-17 Action Plan objectives and strategies support programs that will improve livability in Albany's low-income neighborhoods and will expand economic opportunities for Albany's low-income, homeless, and young adult residents. Public services will help prevent homelessness. Livability will be improved by addressing blighted conditions and community development needs in low- and moderate-income areas, based on community feedback. Partnerships with local organizations will be continued and strengthened. Public input and involvement is ongoing and encouraged via regular opportunities to interact with City staff and the CDC.

Page 4

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

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

Agency Role	Name	Department/Agency
Administration, Planning, and	City of Albany	Community Development
Programming		Department

Table 1 - Responsible Agencies

Narrative

The City of Albany Community Development Department staff is responsible for preparing the Consolidated Plan, Annual Action Plans, administration of each grant program and funding source, and ensuring compliance with HUD regulations.

The Community Development Commission (CDC) reviews and recommends policies, programs, activities, and strategies to the Albany City Council related to the CDBG programs, the Consolidated Plan, Annual Action Plan, and any substantial amendments proposed to those plans. The CDC evaluates performance of the CDBG-funded activities.

Consolidated Plan Public Contact Information

Anne Catlin, Planner III, AICP City of Albany, Community Development Department 333 Broadalbin Street SW Albany, OR 97321;

Email: anne.catlin@cityofalbany.net

Phone: 541-917-7560 Facsimile: 541-791-0150

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

 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 engages in ongoing consultation with local affordable housing providers, service providers, community leaders, the public, and other community development partners. Consultation includes correspondence with area agencies, attendance at local and regional meetings, serving on committees, outreach by Community Development Commissioners (CDC), and CDC public meetings.

The City has ongoing consultation with the following agencies to address needs and to coordinate delivery of services:

- 1. Public and Assisted Housing Providers consultation with the local housing authority Linn-Benton Housing Authority, and the local affordable housing non-profit the Albany Partnership for Housing and Community Development.
- 2. Health and Mental Health Providers consultation with Linn County Mental Health department staff.
- 3. Service Agencies The City solicits applications for public services funding annually; existing subrecipients provide quarterly reports and CDBG subrecipients.

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 and the Community Development Commission (CDC) members coordinate and consult with service providers throughout the year that provide services to Albany's low-income, homeless, and at-risk homeless populations. Consultations are ongoing with local homeless shelter and service providers to assess needs that may be addressed with CDBG-funded activities.

The Community Services Consortium (CSC) is the state and federally recognized community action agency for the region and administers HUD Emergency Solutions Grant funds. CSC acts as a conduit for federal and state homeless program funding and coordinated the development and update of the *Ten-Year Plan to Address Issues Around Housing and Homelessness in Linn County* (Ten-Year Plan).

The CDC chair is staff to the Rural Oregon Continuum of Care (ROCC), a consortium of HUD-funded homeless housing and service providers working in Oregon's most rural counties, including Linn County.

Staff and a few CDC members regularly attend the Homeless Enrichment and Rehabilitation Team (HEART) monthly meetings. HEART includes a broad range of service providers, homeless advocates, health providers, and governmental agencies within Linn County, including CSC and ROCC. HEART members work together to address the needs of Albany's homeless and at-risk populations. Attendance helps to coordinate services, prioritize and address Linn County's homeless and housing needs, and implement strategies identified in the Ten-Year Plan.

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

The City of Albany does not receive ESG (Emergency Solutions Grants) funds. The CSC receives ESG funds for use in Albany. The City consults with the CSC throughout the year to discuss performance and outcomes and determine community and homeless needs that can be addressed with CDBG funds.

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

Direct consultation by staff throughout the year provides an opportunity to clarify and expand on the City's understanding of community needs and funding priorities. City staff consults with area service providers through an annual public services grant application cycle to identify needs that could be addressed with CDBG-funded activities. Primary agencies that were consulted in the development of this Plan are outlined below. A full list is provided in the table that follows.

- The Community Services Consortium (CSC) is a community action agency that receives Community Services Block Grant funding to operate services in a three-county region that includes Albany. CSC provides housing services, rental and utility assistance, job training, and Emergency Solutions Grants (ESG funds) to reduce homelessness in Albany.
- The **Linn-Benton Housing Authority** (LBHA) oversees HUD Section 8 housing activities in Albany and serves over 2,600 families in the two-county area. The LBHA provides housing and services to Albany's elderly population and residents with mental disabilities and other special needs, and administers the Section 8 Housing Choice Voucher program.
- Linn Benton Community College, Small Business Development Center provides education, training, and counseling to small businesses through a team of business advisors and faculty. They offer microenterprise courses and counseling as well as small business management programs to help improve economic opportunities within Albany and the region.
- Linn County Health Services is the primary agency providing mental health services in Albany.
 The Mental Health division offers a Community Support Services team and crisis services for persons with mental illness and disabilities.

EXHIBIT A

Agency/Group /Organization	Agency/Group/ Organization Type	What section of the Plan was addressed by Consultation?	How was the Agency/Group/Organization consulted, and what are the anticipated outcomes of the consultation or areas for improved coordination?
Albany Helping Hands	Services-Homeless	Homeless Needs – all	Albany Helping Hands has the largest homeless shelter with services in Albany. The City consulted with staff to help assess homeless needs and eligible CDBG activities. Long-term homeless need job skills training and counseling in order to re-enter the workforce.
Albany Partnership for Housing and Community Development (APHCD)	Housing, Services – Homelessness	Housing Needs, Homelessness	APHCD owns 133 units of affordable housing and has three permanent supportive housing units. APHCD was consulted for affordable housing, transitional and permanent supportive housing needs. Consultation and coordination is ongoing.
CASA of Linn County	Services – Children Services – Victims	Anti-poverty Strategy	casa of Linn County, Inc. received a 15-16 public services grant. Casa is a non-profit organization that supports volunteers who advocate for the best interests of children who have been abused or neglected and are under the protection of the Juvenile Court in Linn County.
Community Services Consortium (CSC)	Publicly Funded Institution/System of Care Regional Action Agency	Housing Needs Assessment Homeless Needs — All Anti-Poverty Strategy	The Community Services Consortium (CSC) was consulted for input about homelessness data, housing rehabilitation and weatherization programs, job training, and more. Collaboration and consultation will be ongoing throughout the five-year Consolidated Plan period.
Family Tree Relief Nursery (FTRN)	Services – Children Services – Victims	Non-Homeless Special Needs	Staff met with FTRN to discuss needs related to preventing child abuse. FTRN is receiving CDBG funds to provide an infant abuse specialist to LMI families.
Fair Housing Council of Oregon (FHCO)	Housing Service – Fair Housing	Housing Need Assessment Fair Housing	The City works with the Fair Housing Council of Oregon (FHCO) to carry out fair housing training activities for area landlords and tenants. The FHCO provides complaint data. This consultation has and will continue to provide direction for future fair housing training, outreach, and testing.
FISH of Albany	Services-Homeless	Homeless Needs – Families with children Anti-poverty	The City consulted with FISH regarding homeless needs of women with children. FISH also provides numerous services to Albany's low-income residents.

EXHIBIT A

Agency/Group /Organization	Agency/Group/ Organization Type	What section of the Plan was addressed by Consultation?	How was the Agency/Group/Organization consulted, and what are the anticipated outcomes of the consultation or areas for improved coordination?
Greater Albany Public School District (GAPS)	Services-Children Services- homeless Services-Education Other government- Local School District	Homeless Needs- Families with children Anti-poverty Strategy	Consultation with the school district, McKinney- Vinto, and youth services coordinator to work with homeless and highly mobile students residing in the Albany district. Consultation is ongoing.
Jackson Street Youth Services (JSYS)	Services – Homeless Services – Housing Services – Homeless	Homeless Needs Homelessness Needs — Unaccompanied Youth	Homeless Enrichment and Rehabilitation Team (HEART) Homeless needs and priorities. JSYS was consulted on the housing and services needs of homeless and at-risk youth in Albany. The City allocated funding to provide youth case management and to open an emergency shelter and is allocating funding for shelter services in the FY 16-17 Plan.
Linn Benton Community College Small Business Development Center (LBCC SBDC)	Services-Education Services – Employment	Economic Development Anti-Poverty Strategy	The City consulted with LBCC SBDC to determine needs for microenterprises and how to create jobs for low- and moderate-income residents. CDBG funds support the LBCC microenterprise and small business development programs that will increase economic opportunities for Albany's low-income residents and for Albany's Hispanic/Latino residents.
Linn-Benton Housing Authority (LBHA)	Public Housing Authority	Housing – All, Public Housing – All	LBHA provides Section 8 housing choice voucher data for Albany. LBHA was consulted for housing needs of persons with mental illness and affordable housing needs in general. Coordination and consultation will continue as the Consolidated Plan is implemented.
Linn Benton Health Equity Alliance	Services-Health Regional organization	Housing Need Assessment Anti-poverty Strategy Lead-based Paint Strategy	The City consulted with staff regarding diversity and housing issues. The City will continue consultations for guidance on housing policies and practices.
Linn County Health Services	Services-Persons with Disabilities Services-Persons with HIV/AIDS Other government- County	Lead-Based Paint Strategy Homelessness Strategy Non-Homeless Special Needs	Various representatives of Linn County were consulted for input into the healthcare and services needs of many of the populations described in the Consolidated Plan. The county is involved in the Linn County Ten-Year Homelessness Plan and in providing health and mental health care for individuals and families. City and county consultation and collaboration will continue to occur on various fronts on an ongoing basis.

EXHIBIT A

Agency/Group /Organization	Agency/Group/ Organization Type	What section of the Plan was addressed by Consultation?	How was the Agency/Group/Organization consulted, and what are the anticipated outcomes of the consultation or areas for improved coordination?
City of Albany	Local Government	All	Various City departments were consulted to assess community and economic development needs, proposed infrastructure improvements, and code compliance issues. This consultation and coordination will be ongoing.
City of Corvallis	Local Government	Process, Consultation	The City worked with Corvallis to coordinate fair housing education for the public.
U. S. Department of Housing and Urban Development	Housing Other Government- Federal	Housing Need Assessment Market Analysis	Much of the data presented throughout this Consolidated Plan was provided to the City through HUD training and publications. HUD also provided American Community Survey (ACS) data. Consultation with HUD regarding eligible activities, plans, and monitoring will be ongoing.

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

None identified.

AP-12 Citizen Participation

Summarize citizen participation process and how it impacted goal-setting.

The City followed its Citizen Participation Plan to assess needs and prepare the 2016-17 Action Plan. Activities identified in the proposed Plan were greatly informed through resident input and input from local service providers.

Public input and consultation for the 2016-17 Action Plan consisted of the following:

- Attendance at the Homeless Enrichment and Rehabilitation Team (HEART) monthly meetings
- Monthly Community Development Commission (CDC) meetings
- Two pre-application meetings for Public Services grant candidates in November 2015
- Public Service agency presentations at a February 2016 CDC meeting
- Consultations with the Linn-Benton Housing Authority and Albany Partnership for Housing to discuss housing rehabilitation needs
- Ongoing consultation with Community Services Consortium to discuss housing rehabilitation, weatherization, and other housing-related needs and existing resources to address needs
- September 23, 2015, City Council public hearing on community needs (no comments were received)
- April 27, 2016 City Council public hearing on the draft 2016-17 Action Plan

Citizen input from Sunrise area neighborhood residents directly impacted community development public facility improvements.

- Sunrise Park public facility improvements the amenities are dated and unsafe, there is no parking, the park attracts nuisances due to poor lighting
- Sidewalks do not exist in several areas in the Sunrise neighborhood, including primary routes to schools and to Sunrise Park and the safety of several intersections could be improved
- Complaints about living conditions in a few apartment complexes have been received

Citizen input regarding curb ramp needs helped the City prioritize curb ramp projects and provide CDBG funding to the project.

Curb ramps are needed to provide access to sections of the Dave Clark path and walking route

Comments received from local public service agencies through presentations, applications, and grant reports help the CDC prioritize community needs and determine which programs and activities will receive CDBG funding in 2016-17.

The City published notice in the Albany Democrat-Herald on March 28, 2016, of opportunities to review and comment on the 2016-17 Action Plan. The City Council hearing on the Plan was April 27, 2016.

INSERT COMMENTS RECEIVED HERE.

FY 2016-2017 Annual Action Plan OMB Control No: 2506-0117 (exp. 07/31/2015) The notice of public hearing, the comment period, and 2016-17 Action Plan were posted on the website on March 28, 2016, and made available at City Hall and Albany's two public libraries. Notice was emailed to the City's interested parties' list that includes local service agencies and organizations.

AP-15 Expected Resources

Introduction

As an entitlement jurisdiction, the City of Albany receives an annual Community Development Block Grant (CDBG) fund from HUD. The City's 2016 annual grant is \$390,988. The City anticipates approximately \$456,000 of prior year resources will be unspent on June 30, 2016. The City expects that all of the prior year activities will be completed and resources spent by June 30, 2017.

Anticipated Federal Resources

			Expected Amount Available Year 3					
Program	Source of Funds	Uses of Funds	Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total:	Amount Available Remainder of Con Plan	Narrative Description
CDBG	Public- Federal	 Admin and Planning Economic Development Housing Public Improvements Public Services 	\$390,988	\$0	\$456,112	\$847,100	\$375,000	CDBG will leverage private funds, grants, and other public funds

Table 56 - Expected Resources

Explain how federal funds will leverage those <u>additional resources</u> (private, state, and local funds), including a description of how matching requirements will be satisfied.

Anticipated matching resources for programs proposed in the 2016-17 Action Plan are identified below.

- <u>Public Services</u> all subrecipients receiving grants in 2016-17 will provide a match of at least 25 percent, with most matching funds exceeding 100 percent. The primary source of matching funds is private donations, but does include some other federal program funds.
- <u>Sunrise Park Public Improvements</u> will leverage local City parks and recreation funding of \$25,000.

AP-20, 2016-2017 Annual Goals and Projects

This table summarizes the City's 2016-17 Action Plan projects that will implement the Consolidated Plan goals.

Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
Reduce Homelessness	2016	2017	Public Services: shelter and case management	Census Tract 204	Reduce youth homelessness: Youth services (Jackson Street Albany House)	\$18,000	30 people assisted
Reduce Homelessness	2016	2017	Public Services: employment training	Citywide	Job skills, employment training (Helping Hands)	\$12,200	30 people assisted
Reduce Homelessness	2016	2017	Public Services: abused and neglected children	Citywide	Public Services – infant abuse prevention (Family Tree Relief Nursery)	\$15,000	40 people assisted
Further Fair Housing	2013	2017	Public Services: Fair Housing Activities	Citywide	Increase awareness of fair housing laws and resources	\$600	20 people assisted
Remove Blighting Influences in LMI areas	2013	2017	Non-Housing Community Development	Census Tract 208	Public improvements – parks, sidewalks and paths, curb ramps pedestrian safety, and safe routes to schools	\$159,300	1,000 people benefitted
Remove Barriers to Accessibility	2013	2017	Non-Housing Community Development	Census Tracts 204 and 208	Remove barriers to accessibility: Public Improvements - Infill sidewalks and curb ramps	\$95,000	300 people benefitted
Increase Economic Opportunities	2016	2017	Public Services: employment training	Citywide	Job skills, employment training (YouthBuild)	\$12,800	6 people assisted
CDBG Program Administration and Planning	2013	2017		Citywide	Ensure Albany is in compliance with all applicable regulations.	\$78,100	Not applicable

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

The City's Housing Needs Assessment in the 2013-17 Consolidated Plan identified housing cost burden as the primary housing problem facing Albany's LMI households. The assessment also found there is an aging housing stock in need of long-term maintenance located in Albany's two low-income Census Tracts 204 and 208.

The City of Albany established a housing rehabilitation program that offers grants to households earning 60 percent or less of the area median income and free weatherization services. No-interest loans are available for households earning less than 80 percent of the area median income. These programs will reduce housing cost burden by reducing maintenance costs and annual operating costs.

The City addresses residential code compliance issues when complaints are reported and substantiated. The City has received complaints regarding living conditions in a few apartment complexes located in one of Albany's low-income target areas.

The City expects that CDBG funding will rehabilitate and/or weatherize at least eight low- and moderate-income households in FY 2016-17.

The City does not receive HOME funds.

AP-35 Projects - 91.220(d)

Introduction

This section lists and describes the projects that will be carried out under the City of Albany Community Development Block Grant program during FY 2016-17. The projects reflect priorities that have been identified within the 2013-17 Consolidated Plan.

Projects proposed in the fourth year of the Consolidated Plan include accessibility improvements, public facility improvements, and public services. Projects are intended to increase access to facilities, remove blighting conditions in Albany's low-income target areas, reduce homelessness, expand economic opportunities, and further fair housing. Details are provided in AP-38 Project Summary.

#	Project Name
1	Reduce Homelessness – Youth Shelter Services
2	Reduce Homelessness – Homeless Employment Services
3	Reduce Homelessness - Infant Abuse Prevention
4	Further Fair Housing – Fair Housing Education and Outreach
5	Suitable Living Environment – Sunrise Park Area Improvements
6	Accessibility Improvements – Infill Sidewalks and Curb Ramps
7	Increase Economic Opportunities – Youthbuild Job Skills Training
8	CDBG Program Administration and Planning

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

The Community Development Commission (CDC) evaluated performance of existing programs, assessed community needs through public meetings, and reviewed applications for public services.

The CDC evaluated community needs and elected to focus funding to address the following goals:

- Reduce homelessness
- Improve livability and housing conditions in low-income neighborhoods
- Provide safe and accessible routes to schools, facilities, and amenities in Census Tracts 204 and
 208
- Expand economic opportunities for Albany's homeless and low- and moderate-income residents

Several programs are continuing with prior year funds: housing rehabilitation, Sunrise area public improvements, microenterprise development, and small business assistance. New projects include curb ramps and infill sidewalks. Public services activities will address the goals to reduce and prevent homelessness and expand economic opportunities for Albany's low-income residents.

Lack of funding is the primary obstacle to addressing underserved needs.

AP-38 Project Summary

The projects and activities that have been recommended for funding in the 2016-17 Action Plan are described below.

Project 1: Reduce Homelessness - Youth Shelter Services

This Public Services activity will provide emergency and transitional shelter and support/prevention services to Albany's runaway, homeless, and at-risk youth ages 10 to 18. Emergency shelter stays range from a few hours up to 15 days. The Albany House also provides a transitional living program for youth ages 15 to 18 who do not have a suitable home to return to. Shelter programs and case plans are prepared for each youth based on their needs, strengths, and situations. The transitional living program will encourage self-sufficiency through the *Positive Youth Development* approach, giving young people opportunities to exercise leadership, build skills, and get involved in their communities.

Outcomes: 30 at-risk or homeless youth assisted

Project 2: Reduce Homelessness - Homeless Employment Services

CDBG Public Services funding will help Albany Helping Hands provide an employment coordinator that will provide counseling and job skills training to help extremely low-income and unemployed homeless guests gain employment. The Employment Coordinator will collaborate with Albany area employers to provide training and employment; will develop training curriculum, life skills programs, and résumé and interviewing assistance. The goal of the program is to help homeless guests transition into permanent employment and housing.

Outcomes: 30 LMI or homeless residents served

Project 3: Reduce Homelessness - Infant Abuse Prevention

Family Tree Relief Nursery (FTRN) will use a CDBG Public Services grant to prevent child abuse through the Therapeutic Childhood Program's home-based services provided to high-risk families with children under the age of two. A trained interventionist educates parents impacted by domestic violence and substance abuse in how to make safe choices to build healthy families and prevent foster care placements. The program also prepares children for kindergarten by developing their physical, social, and emotional skills. The agency also offers many complementary services in collaboration with other agencies, such as distribution of food boxes to their low-income clients.

Outcomes: 40 LMI residents served

Project 4: Further Fair Housing - Fair Housing Education and Outreach

The City will work with the Fair Housing Council of Oregon (FHCO) to provide fair housing training for Albany property owners, landlords, developers, City staff, and others in the housing industry. The FHCO will also provide counseling through their hotline. City staff will attend training to understand fair housing laws related to new development and will monitor ads for discrimination. The City will increase community awareness of fair housing laws by increasing distribution of fair housing information in English and in Spanish. Brochures are located in City Hall, at the public libraries, on the City's website, and at the Welcome Center. Staff will also review housing advertisements for potential fair housing violations and mail fair housing brochures to landlords.

Outcomes: 20 residents or landlords assisted or trained

Project 5: Suitable Living Environment - Sunrise Area Public Improvements

A community priority identified through the citizen participation process and noted in the Consolidated Plan is to provide public improvements in Census tract 208 to remove blighting influences and improve the safety and livability of Sunrise Park and the areas around Sunrise School and Sunrise Park. CDBG funds will pay to install infill sidewalks and curb ramps, new paths, park equipment, a parking lot, new and more lighting and other safety improvements such as curb extensions, high visibility crosswalks, and pedestrian warning signals at busy intersections.

Outcomes: 1,000 LMI area residents served

Project 6: Accessibility Improvements – Infill Sidewalks and Curb Ramps

City staff and residents have identified areas in Census Tracts 204 and 208 where curb ramps and sidewalks are needed. This project will remove barriers to accessibility and improve pedestrian conditions. Sidewalks and curb ramps are missing along several pedestrian and cycling routes to neighborhood schools and parks.

Outcomes: 300 LMI residents served

Project 7: Increase Economic Opportunities - YouthBuild Job Skills Training

CDBG Public Services grant funding will enable the Community Services Consortium Youthbuild program to continue. The program serves low-income residents between the ages of 16-24. These young adults work with educators, technicians, and a crew leader to obtain their GEDs and acquire industry certifications that will enable them to get jobs in the construction and energy efficiency sectors.

Outcomes: 6 LMI residents served

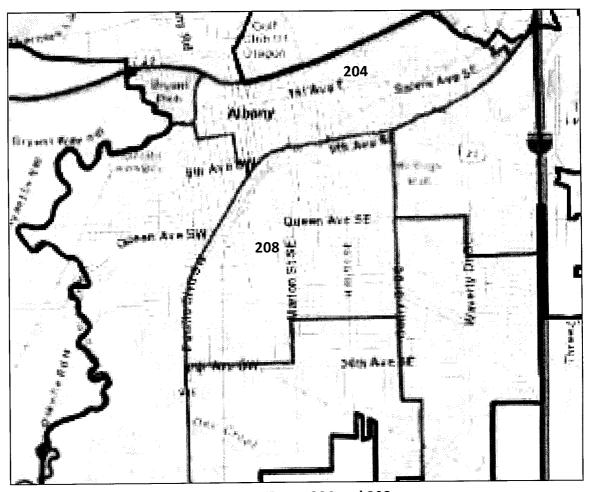
AP-50 Geographic Distribution

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

The City of Albany has two census tracts qualify as low-income tracts according to HUD standards where over 50 percent of the households have incomes less than 80 percent of the area median income.

Census Tract 204 has the highest percent of persons in poverty, at 39.1 percent. Census Tract 204 is bordered by the Willamette River to the north and includes historic downtown and older areas in the heart of the City.

Census Tract 208 abuts Tract 204 to the south and is located in the geographic center of the city. Tract 208 is south and east of Pacific Boulevard, State Route 99. It includes a large amount of industrial land, apartments, and housing built in the 1970s and 1980s. Tract 208 also includes a concentration of Hispanic/Latino and other minority households.



Census Tracts 204 and 208

Geographic Distribution

Table 60, below, estimates the percentage of 2016-17 program year funds that will be directed to projects and programs within the two geographic target areas, Census Tracts 204 and 208.

Target Area	Percentage of Funds
204 and 208	70%

Table 60 - Geographic Distribution

Rationale for the priorities for allocating investments geographically

In the 2016-17 Action Plan, the City will focus funding on removing blighting influences and improving accessibility in Census Tracts 204 and 208. Census Tract 204 is Albany's highest percent of low-income residents in Albany. Census Tract 208 has two block groups with a low-moderate percentage over 70 percent, and two more block groups with low-moderate percentages averaging 51 percent. Census Tract 208 also has a high concentration of minority populations.

The City estimates 70 percent of its 2016 CDBG entitlement award will be spent in Census Tracts 204 and 208.

Affordable Housing

AP-55 Affordable Housing

Introduction

In this section of the Plan, HUD asks jurisdictions to indicate the number of households that will be assisted with an affordable housing program such as rental assistance, housing rehabilitation, or new housing.

The City of Albany's low-income housing rehabilitation program will help improve the quality and livability of Albany's existing affordable housing stock. The housing rehabilitation program will continue in FY 2016-17 using CDBG funding from prior years. The number of households expected to be served by this program was reported in the FY 2014-15 and FY 2015-16 Action Plans so no figures are reported below.

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

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

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

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

Discussion

The City will be providing CDBG funding to several agencies that will be supporting Albany's homeless households, low-income households, and households with special needs. However, this section does not include reporting on the provision of emergency shelter, transitional shelter, or social services.

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

Introduction

The Albany region has a network of homeless assistance providers including emergency shelters, support for victims of domestic violence, child abuse prevention, medical and dental support, soup kitchens, and food and clothing pantries for the homeless. Providers and advocates work together to refer the homeless to services that can help them find safe affordable housing. Despite successful efforts by local providers and Emergency Homeless Assistance and Emergency Solutions Grants to reduce homelessness, there is ongoing need to assist persons who are homeless, or at risk of becoming homeless, with affordable housing.

The 2015 Point in Time (PIT) homeless one-night count identified 222 homeless individuals in Linn County representing 181 households. Of these, 154 people reported being sheltered and 68 reported being unsheltered. Only 20 homeless residents counted were under 18 and there were 15 between 18 and 24 years of age.

The McKinney-Vento Homeless Count for the 2014-15 school year, provided by the Albany School District, found there were 385 children in grades K through 12 that were considered homeless (including those staying in shelters, with friends or relatives, or in a motel). Of these, 102 were unaccompanied youth.

Describe the jurisdiction's 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 of Albany's one-year goals and actions for reducing and ending homelessness include the following activities:

- 1. Actively participate in the Homeless Enrichment and Rehabilitation Team (HEART). HEART members work together to coordinate efforts to address needs identified in the *Linn County Ten-Year Plan to Address Issues Around Homelessness*. The HEART team has prepared bags stocked with basic necessities and a resource list for where to go locally to get services and shelter. HEART also sponsors an annual resource fair for Albany's homeless residents that include numerous area agencies and vendors that help residents with medical and dental needs, haircuts, identification, and numerous other services.
- 2. In 2015, the Community Services Consortium (CSC) also sponsored Linn County's first "stand down" event (fair) for veterans.
- 3. Participate in the annual homeless resource fairs.
- 4. Provide Public Services grants to local agencies that work to prevent homelessness or work with homeless residents and youth to move homeless persons into permanent housing.
- 5. Monitor Albany's homeless camps and work with agencies to encourage these residents to seek support services.

The City collaborates with and supports Albany's two adult homeless shelters and the new youth shelter. The City also works with area agencies that provide services and outreach to Albany's homeless populations, including the Community Services Consortium (CSC). As the local community action

agency, CSC administers state Emergency Housing and federal Emergency Solutions grants to house homeless individuals and to provide emergency housing assistance to prevent homelessness.

Describe the jurisdiction's one-year goals and actions for 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 of Albany's 2016-17 Action Plan goals to help homeless persons make the transition to permanent housing and to preventing future homelessness include the following projects/services):

- Homeless and Unaccompanied Youth Support Services The local youth shelter, the Albany House, opened last year with CDBG support. CDBG Public Services grants will provide emergency and transitional housing, case management, and support services for 30 of Albany's unaccompanied youth. The shelter programs promote self-sufficiency using the Positive Youth Development approach.
- Homeless Adults CDBG funds will help the Albany Helping Hands shelter hire an employment coordinator. The coordinator will work with shelter guests to get job skills training, life skills, education, and more to help them gain employment. The goal of the program is to help at least 30 residents through the steps to prepare for and apply for jobs.

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 following programs and services provided by Albany agencies help prevent Albany's low-income and at-risk residents from becoming homeless. Most of these programs and services did not request CDBG funding this program year.

- Infant Abuse Prevention Family Tree Relief Nursery (FTRN) will use a Public Services grant to
 provide a home-based intervention service for high-risk families struggling with domestic
 violence and substance abuse. The FTRN works with parents and children to strengthen and
 keep families together and to prevent abuse and foster care placements.
- Albany has ten Oxford Houses that provide housing for more than 130 people recovering from drug and alcohol addiction. Many of these individuals have also been incarcerated and have difficulty finding and staying in permanent housing on their own once released from jail.
- The CSC provides utility assistance, rental assistance, financial fitness classes, and help for homeowners through several programs. They administer federal emergency housing grants to provide emergency housing assistance and rapid re-housing assistance to area homeless and atrisk residents.

- FISH of Albany manages the "toto" fund that helps people return home to their local support systems if they have become homeless in Albany.
- The ABC House provides counseling to parents and family members to reduce the incidences of child abuse and consequent homelessness for children and families.
- Willamette Neighborhood Housing Services provides foreclosure prevention counseling for homeowners.

AP-75 Barriers to Affordable Housing (CFR 91.220(j))

Introduction

The largest barrier to affordable housing in Albany is lack of available units to households or individuals earning less than 50 percent of the area median family income. Thousands of Albany households are experiencing high housing cost burden. Rents have also increased substantially over the last two years, reducing Albany's supply of affordable housing units.

Actions 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.

When developing Albany's current *Analysis of Impediments to Fair Housing and Fair Housing Plan (AI)*, the City conducted a thorough review of its land use policies. The Albany Comprehensive Plan includes several policies that promote the development and maintenance of affordable housing in the City. Policies also promote housing variety, mixed use housing, and infill development. Despite numerous policies and zoning standards to allow new affordable housing to be constructed, the analysis concluded there are additional affordable housing policies that could be considered to increase the affordable housing supply and housing choices.

In the 2016-17 program year, the City will undertake the following actions to identify and ameliorate negative effects of potential barriers to affordable housing:

- Concentrate CDBG housing rehabilitation funding in Census Tracts 204 and 208 to improve the livability and affordability of housing for low-income residents. Performance Measure: Rehabilitate four low-income households to include weatherization and accessibility assistance as applicable.
- Concentrate CDBG community development funding in Census Tracts 204 and 208 to provide safe pedestrian routes and remove unsafe conditions in the neighborhood in order to encourage reinvestment and stability in these neighborhoods. Performance Measure: Add 650 linear feet of missing sidewalk and install 10 accessible curb ramps.
- The City will be developing its Fair Housing Assessment in the 2016-17 fiscal year, which is due to HUD in May 2017. As part of the assessment, the City will be working with the University of Oregon to conduct an equity and opportunity mapping analysis. The analysis will present a clearer picture of demographic and housing conditions by area, and will help the City to determine how to address access to decent affordable housing, suitable living environments, and quality community facilities and amenities.

Page 22

AP-85 Other Actions-91.220(k)

Actions planned to address obstacles to meeting underserved needs:

Lack of funding is the primary obstacle to meeting underserved needs. The City is allocating the maximum amount it can (15 percent of the annual CDBG entitlement allocation) to Public Services.

The City will continue to work with area agencies and other public and governmental entities to identify ways to collaborate resources and programming to do more in the community to address underserved needs.

Actions planned to foster and maintain affordable housing:

The City will continue the Housing Rehabilitation grant and loan programs that provide funds to owners of low-income housing units to rehabilitate their homes. The program is a partnership with the Community Services Consortium (CSC) that also provides free weatherization assistance. These programs help to both improve and maintain Albany's existing affordable housing supply and reduce operating and rehabilitation costs for households earning less than 60 percent of the area median income.

Actions planned to reduce lead-based paint hazards:

The City currently distributes lead-hazard information pamphlets to any resident seeking information regarding housing repairs in historic districts. The City also offers links on its historic resource website to this information.

The City developed lead safe housing checklists that will be used by the CSC staff, who administers Albany's housing rehabilitation programs for rehabilitation projects on housing units constructed before 1978. The checklist follows the federal requirements for lead safe housing and includes evaluation, testing, implementing safe work practices, compliance with the EPA's Renovator, repair and painting laws, clearance exams or risk assessments as required. In addition, the CSC will distribute lead-hazard information to each recipient of a housing rehabilitation loan or grant. The pamphlets are available on the City's website and at City Hall.

The City will monitor each housing rehabilitation project involving housing units constructed before 1978 for compliance with the federal standards and processes.

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

The Infant Abuse Prevention program provided by Family Tree Relief Nursery described earlier will help parents of families in poverty gain skills to make safe choices for their family, and help them recover from domestic and substance abuse situations.

The City will continue to expand economic opportunities for Albany residents in FY 2016-17 with prior year CDBG resources through the following two programs:

 Microenterprise Development – Prior year CDBG funds will continue to support the Linn-Benton Community College Small Business Development Center's Microbusiness programs. Programs provide free and reduced-cost courses and one-on-one advising to Albany's low-income entrepreneurs. Economic Opportunity Grants – The City will continue its small grant program that provides financial assistance to small businesses to offset costs to create jobs made available to LMI residents.

Actions planned to develop institutional structure:

Albany is fortunate to have agencies with well-established service delivery structures within the City.

The City will work to develop program policies, contract templates, report templates, and monitoring guidelines.

The City will work with subrecipients to assess their needs in order to ensure successful implementation of the CDBG programs and desired outcomes.

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

Thanks to efforts by many agencies, there is a good communication and delivery structure in Albany for addressing homeless needs, including housing and social service agencies. There is coordination among Albany's social service agencies and governmental agencies, such as between the Department of Human Services and the Family Tree Relief Nursery child abuse prevention program. There is also coordination with affordable housing providers to connect clients and residents to services and/or housing. The Homeless Enrichment and Rehabilitation Team (HEART) board meets monthly, representing a large coordination effort between service agencies, the public, and local government.

An ongoing City goal is to coordinate and facilitate partnerships among affordable housing and service providers. This coordination would help to ensure the resources of agencies serving low-income community members are applied efficiently and that residents/clients are supported throughout the housing continuum.

AP-90 Program Specific Requirements

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 on page 14. 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. N/A	\$0
3.	The amount of surplus funds from urban renewal settlements. N/A	\$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. N/A	\$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	90.0%
	overall benefit of 70 percent of CDBG funds is used to benefit persons of low and moderate income. Specify the years covered that include this annual Action Plan.	2013-2017

Discussion:

Albany is entering its fourth year as an Entitlement grantee and has not generated any program income to date.

Page 25