Amended on May 18, 2020 to add CARES Act funds to the PY 2019 Annual Action Plan.

### **Executive Summary**

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

#### 1. Introduction

The City of Wauwatosa Annual Action Plan for the Community Development Block Grant Program (CDBG) is a comprehensive document that outlines goals to assist low/moderate income individuals through various programs/services throughout the program year. Each program/project funded with CDBG is designed to meet one of three major objectives (Decent Housing, Suitable Living Environment, or Economic Opportunity) and to contribute accomplishments under one or more of the three categories of outcomes (increase availability/accessibility, increase affordability, increase sustainability).

The City of Wauwatosa is receiving a total of \$969,886 in new Community Development Block Grant (CDBG) funding in 2019. In addition to the annual allocation, some projects will be funded with carryover funds from previous years or unspent funds from closed out projects.

The City of Wauwatosa is receiving a total of \$795,942 in Community Development Block Grant - COVID-19 (CDBG-CV & CDBG-CV3) funding in 2020.

In addition, Milwaukee County HOME Consortium receives the City of Wauwatosa's share of the HOME funds and provides services with these funds on its behalf.

### 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.

**Provide Services to Senior Citizens:** Emphasis is placed on programs that improve the quality of life for Wauwatosa's senior population, which comprises approximately 20% of the total population. In particular, programs serve the needs of low-income seniors.

**Improve the quality of life for individuals with disabilities:** CDBG funds support programs that offer services to low income individuals with disabilities.

**Undertake improvements to public facilities:** The City provides funds for implementation of eligible public facilities projects as needed.

Annual Action Plan 2019 **Promote economic development:** The City provides funds to businesses for eligible economic development projects when they create FTE jobs filled with low/moderate income individuals.

**Promote equal opportunity in housing:** A portion of Wauwatosa's CDBG funding supports The Metropolitan Milwaukee Fair Housing Council who, through its Fair Housing Project, works to ensure that all people have equal access to housing opportunities and to eliminate unfair/illegal discrimination in the sale, rental, financing and insuring of housing. MMFHC provides counseling and investigative services to people who report possible violations of fair housing laws and conducts outreach and informational activities directed toward increasing public awareness of equal opportunity in housing.

Increase and improve affordable housing opportunities for LMI people: Another priority undertakes vital improvements to enhance the quality of life and safety of low-income, elderly and disabled residents in subsidized residential facilities. Priority will also be given to housing programs that perform improvements to low-income homeowners and assist low-income homebuyers.

**Provide quality planning projects and program administration**: Planning studies that support economic development, housing and other relevant goals of the CDBG program will be undertaken as needed. Funds are also provided for staff time and training for program administration.

### 3. Evaluation of past performance

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

Projects that address suitable living and economic opportunity objectives consistently meet their goals assisting LMI populations. Programs that fall into the public service and public facilities/economic development categories, such as the programs that assist Wauwatosa's senior and disabled populations, rely on CDBG funding to continue offering quality services to the predominantly LMI populations they serve. Many of these programs apply for CDBG funds on an annual basis and as a result, city staff has been able to foster positive, close-working relationships with the organizations that allow for effective communication and problem solving.

The City of Wauwatosa has a slightly more difficult time meeting the goals of the housing programs. Wauwatosa is almost completely built out, there is very little available land for residential development and vacancy rates (owner and rental) are consistently low – around 2%. In addition, the land values are high in Wauwatosa. The cost of existing housing units is dictated by market forces and new developments have followed market trends/rates as well. The NIMBY philosophy results in resistance to duplex/multi-family housing construction in many areas of the community and makes it challenging to secure approval from the Common Council for these types of projects; the political feasibility of affordable housing remains a barrier to such projects. Discrimination in housing also likely plays a role. All of these characteristics and issues act as impediments to affordable housing.

As a result of the impediments listed above, Wauwatosa will focus funds on supporting/enforcing fair housing initiatives/laws and rehabilitating/upgrading existing low-income housing facilities and assisting low-income homebuyers. Additionally, we will offer continued support of housing that ensures the underserved low-income population living with HIV has housing and support options in Wauwatosa. Moving forward funds have been approved for housing rehab activities for LMI households.

#### 4. Summary of Citizen Participation Process and consultation process

Summary from citizen participation section of plan.

With the intention of increasing public involvement, Wauwatosa worked with Community Planning and Development Advisors, LLC (CPDA) to conduct focus groups and an on-line survey for stakeholders and possible beneficiaries. CPDA invited stakeholders from the City who represented a variety of groups, elected officials, and administrators involved in the City's community development program to participate in focus groups.

The City emailed focus group invitations to 42 individuals and organizations, including the City's CDBG Committee, CDBG sub-recipients, relevant City Departments (e.g. Health, Engineering), and the Common Council. Additionally, these groups received an email with a link to the citizen survey that described the survey and its purpose. The same email was distributed to all email subscribers of the City's neighborhood group association. A press release with the survey link and purpose was sent to the Wauwatosa Patch and Wauwatosa NOW publication and posted on the City website.

On June 26, 2013, the consultant (CPDA) conducted three focus groups. Facilitators used a nominal group technique developed by Andre Delbecq to help each group generate a series of responses to topic questions, clarify and consolidate the ideas, and rank them. The following questions were asked of each group: In your opinion, 1) What has the City done well in planning and administering its CDBG and HOME programs (strengths) over the last 5 years; 2) What were the weaknesses in the City's planning and administering of the CDBG and HOME programs over the last 5 years; 3) What could they do better and what should be the focus and priorities for the next 5-Year Con Plan?

A Milwaukee County Consolidated Plan Needs survey was conducted online during the months of July and August, 2013. The survey was accessible to the residents of the City of Wauwatosa online and was distributed through email. The survey consisted of 17 questions broken into the following categories:

- Demographic information
- Community needs assessment
- Public spending importance assessment

Citizens and other interested parties had the opportunity to comment on the citizen participation plan on October 24, 2017 and the Annual Action Plan from July 9, 2018 - August 9, 2018. Written comments

submitted to the Community Development were also accepted. Notice was sent to the local newspaper and community organizations that may have an interest in the plan.

### 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.

The highest rated strengths of the program were the City's a staff, who according to the group, were a pleasure to work with, provided timely responses to questions, and were flexible/helpful. The next rated strength was the application for funding; it was consistent from year to year and the reporting requirements of the program were clear and understandable.

The weaknesses of the program were: the housing priority has been difficult to address, not enough was done over last 5 years; need to facilitate collaboration/communication between agencies that receive funding; need for more opportunity for agencies to market/inform each other about their programs; and more communication, in general, needed.

The focus/priorities for the next 5 years receiving the highest ranking were: decisions on how to address the need for a senior center; facilitate/encourage collaboration/communication among agencies, have localized events in Wauwatosa; have training sessions for perspective applications each year and use rating criteria for review of applications.

#### **Summary of Survey Results:**

Housing/Community Needs: The respondents rated the following housing needs as 1) maintenance and upkeep of rental properties; 2) Home repairs for existing homeowners; 3) Actions to address abandoned vacant properties; 4) Affordable rental housing and 5) Increasing home ownership. Public Facility Improvements The facility improvement activity rated as having the highest need were to improve the condition of neighborhood parks and/or public spaces, next was to improve the condition of neighborhood/community facilities and then to increase the number of recreational facilities.

### **Results of Public Hearing:**

Ten different community organizations provided comment at the public hearings on the Consolidated Plan. Comments demonstrated the need for safe, affordable housing, especially for low-income senior and disabled populations and public services to provide additional support. Emergency food and basic need supplies also are in demand and the agencies providing support have seen increased use over the years.

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

All comments were heard and accepted. Records of all the comments received and minutes from meetings where public comments were taken are kept on file at the City's Development Department.

### 7. Summary

The City of Wauwatosa is receiving a total of \$969,886 in new Community Development Block Grant (CDBG) funding in 2019 and \$795,942 in CDBG-CV funds in 2020. In addition to the annual allocation, some projects will be funded with carryover funds from previous years or unspent funds from closed out projects.

Public hearings for CDBG-CV funds held May 12, 2020 and October 27, 2020 at the Financial Affairs Committee and Common Council. No public comments were received.

### 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	WAUWATOSA				
CDBG Administrator	/AUWATOSA		Development Department - Planning Divison		
HOPWA Administrator					
HOME Administrator	WAUWATOSA				
HOPWA-C Administrator					

Table 1 – Responsible Agencies

#### **Narrative**

The City of Wauwatosa is part of the Milwaukee County Consortium. Milwaukee County serves as the lead agency; Wauwatosa is participating member along with the City of West Allis.

### **Consolidated Plan Public Contact Information**

City of Wauwatosa

**Planning Division** 

7725 W North Avenue

Wauwatosa, WI 53213

414-479-8957

www.wauwatosa.net

tplanning@wauwatosa.net

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

#### 1. Introduction

For PY 2019, Public Notices soliciting public input were placed on the City's website and distributed to community-based organizations. Public Notices for the Public Hearings were published in the official City newspaper, TosaNow. All CDBG Public Hearings are held in buildings which are handicap accessible to allow for access to elderly persons and persons with disabilities. The first Public Hearing was held on October 24, 2018 during a meeting with the CDBG Committee and a second Public Hearing was held on October 29, 2018 to present the recommended community development activities to the general public and to solicit feedback.

Efforts to increase public involvement in development of the 2014-2018 Five-Year Consolidated Plan, the City of West Allis, City of Wauwatosa, and Milwaukee County contracted with Community Planning and Development Advisors, LLC (CPDA) to conduct focus groups and an on-line citizen survey for stakeholders, practitioners and possible beneficiaries involved with the CDBG and HOME programs.

Also, Wauwatosa and CPDA invited stakeholders from the City of Wauwatosa who represented the variety of groups, elected officials, and administrators involved in the City's community development program to participate in focus groups.

Wauwatosa emailed focus group invitations to 42 individuals and organizations, including the City's CDBG Committee, CDBG sub-recipients, relevant City Departments (e.g. Department of Health, Department of Engineering), and the Common Council. Additionally, these groups and individuals received an email with a link to the citizen survey that described the survey and its purpose. The same email was distributed to all subscribers of the City's neighborhood group association. A press release with the survey link and purpose was sent to the Wauwatosa Patch and Wauwatosa NOW publications. The survey link was also posted on the City website homepage.

On June 26, 2013, the consultant CPDA conducted three focus groups. Facilitators used a nominal group technique developed by Andre Delbecq to help each group generate a series of responses to topic questions, clarify and consolidate the ideas, and then rank them. The following questions were asked of each group: In your opinion, 1) What has the City done well in planning and administering its CDBG and HOME programs (strengths) over the last 5 years; 2) What were the weaknesses in the City's planning and administering of the CDBG and HOME programs over the last 5 years; 3) What could they do better and what should be the focus and priorities for the next 5-Year Con Plan?

Summary of Results: The highest rated strengths of the program were the City's a staff, according to the group, they said they were a pleasure to work with, they provided timely responses to questions and were flexible and helpful. The next rated strength was the application for funding, it was consistent from year to year and the reporting requirements of the program were clear and understandable.

The weaknesses of the program were: the housing priority has been difficult to address, not enough was done over last 5 years; need to facilitate collaboration and communication between agencies who receive funding; need for more opportunity for agencies to market/inform each other about their programs; and more communication, in general, needed.

The focus/priorities for the next 5 years receiving the highest ranking were: make decisions on how to address the need for a senior center; facilitate/encourage collaboration and communication among agencies, have localized events in Wauwatosa; have training sessions for perspective applications each year and use rating criteria for review of applications.

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)).

As a member of the Consortium, Wauwatosa works with The Milwaukee County Housing Division, which participates in several community groups to ensure coordination. The City is also an active, participating member in the Continuum of Care and attends meetings where numerous entities come together to address these issues in the community.

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 is a member of the Continuum of Care (CoC), signs onto the NOFA application and attends COC monthly meetings to remain up to date on services that offered in the community. The City participated in the COC sponsored point in time homeless count and will continue to do so to track the population over time.

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 Development Director attends COC meetings and can provide input.

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

Table 2 – Agencies, groups, organizations who participated

1	Agency/Group/Organization	Metropolitan Milwaukee Fair Housing Council		
	Agency/Group/Organization Type	Services - Housing Planning organization		
	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		
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	The City of Wauwatosa emailed focus group invitations to 42 individuals and organizations, including the City's CDBG Committee, CDBG sub-recipients, relevant City Departments (e.g. Department of Health, Department of Engineering), and the Common Council for the purpose of getting their input into the community development focus/priorities for the next 5-year Con Plan. Each annual plan cycle these groups are consulted with again and attend a public hearing on the needs and goals of the community.		
2	Agency/Group/Organization	COMMON GROUND MINISTRY / ELENA'S HOUSE		
	Agency/Group/Organization Type	Housing Services-Persons with HIV/AIDS Services-Health		
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Homelessness Strategy Non-Homeless Special Needs		

	Briefly describe how the Agency/Group/Organization	The City of Wauwatosa emailed focus group invitations to 42 individuals and		
	was consulted. What are the anticipated outcomes of	organizations, including the City's CDBG Committee, CDBG sub-recipients, relevant City Departments (e.g. Department of Health, Department of		
	the consultation or areas for improved coordination?			
		Engineering), and the Common Council for the purpose of getting their input into		
		the community development focus/priorities for the next 5-year Con Plan. Each		
		annual plan cycle these groups are consulted with again and attend a public		
		hearing on the needs and goals of the community.		
3	Agency/Group/Organization	INTERFAITH SERVICES		
	Agency/Group/Organization Type	Services-Elderly Persons		
		Services-Persons with Disabilities		
		Services-Health		
	What section of the Plan was addressed by	Housing Need Assessment		
	Consultation?	Non-Homeless Special Needs		
	Briefly describe how the Agency/Group/Organization	The City of Wauwatosa emailed focus group invitations to 42 individuals and		
	was consulted. What are the anticipated outcomes of	organizations, including the City's CDBG Committee, CDBG sub-recipients,		
	the consultation or areas for improved coordination?	relevant City Departments (e.g. Department of Health, Department of		
		Engineering), and the Common Council for the purpose of getting their input into		
		the community development focus/priorities for the next 5-year Con Plan. Each		
		annual plan cycle these groups are consulted with again and attend a public		
		hearing on the needs and goals of the community.		

4	Agency/Group/Organization	TOSA COMMUNITY FOOD PANTRY
	Agency/Group/Organization Type	Housing
		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
	What section of the Plan was addressed by	Housing Need Assessment
	Consultation?	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
		Economic Development
		Anti-poverty Strategy
	Briefly describe how the Agency/Group/Organization	The City of Wauwatosa emailed focus group invitations to 42 individuals and
	was consulted. What are the anticipated outcomes of	organizations, including the City's CDBG Committee, CDBG sub-recipients,
	the consultation or areas for improved coordination?	relevant City Departments (e.g. Department of Health, Department of
		Engineering), and the Common Council for the purpose of getting their input into
		the community development focus/priorities for the next 5-year Con Plan. Each
		annual plan cycle these groups are consulted with again and attend a public
Ì		hearing on the needs and goals of the community.

5	Agency/Group/Organization	Tosa Cares
	Agency/Group/Organization Type	Housing
		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
	What section of the Plan was addressed by	Housing Need Assessment
	Consultation?	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
		Anti-poverty Strategy

	1	T		
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	The City of Wauwatosa emailed focus group invitations to 42 individuals and organizations, including the City's CDBG Committee, CDBG sub-recipients, relevant City Departments (e.g. Department of Health, Department of Engineering), and the Common Council for the purpose of getting their input in the community development focus/priorities for the next 5-year Con Plan. Each annual plan cycle these groups are consulted with again and attend a public hearing on the needs and goals of the community.		
6	Agency/Group/Organization	WWBIC		
	Agency/Group/Organization Type	Services-Education Services-Employment Regional organization Business Leaders Business and Civic Leaders		
	What section of the Plan was addressed by Consultation?	Non-Homeless Special Needs Economic Development Anti-poverty Strategy		
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	The City of Wauwatosa emailed focus group invitations to 42 individuals and organizations, including the City's CDBG Committee, CDBG sub-recipients, relevant City Departments (e.g. Department of Health, Department of Engineering), and the Common Council for the purpose of getting their input into the community development focus/priorities for the next 5-year Con Plan. Each annual plan cycle these groups are consulted with again and attend a public hearing on the needs and goals of the community.		

Agency/Group/Organization	Community First, Inc.
Agency/Group/Organization Type	Housing
	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
What section of the Plan was addressed by	Housing Need Assessment
Consultation?	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
Briefly describe how the Agency/Group/Organization	The City of Wauwatosa emailed focus group invitations to 42 individuals and
was consulted. What are the anticipated outcomes of	organizations, including the City's CDBG Committee, CDBG sub-recipients,
the consultation or areas for improved coordination?	relevant City Departments (e.g. Department of Health, Department of
	Engineering), and the Common Council for the purpose of getting their input into
	the community development focus/priorities for the next 5-year Con Plan. Each
	annual plan cycle these groups are consulted with again and attend a public
	hearing on the needs and goals of the community.

8	Agency/Group/Organization	Lutheran Home		
	Agency/Group/Organization Type	Housing Services - Housing Services-Elderly Persons Services-Persons with Disabilities Health Agency		
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Public Housing Needs Non-Homeless Special Needs		
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	The City of Wauwatosa emailed focus group invitations to 42 individuals and organizations, including the City's CDBG Committee, CDBG sub-recipients, relevant City Departments (e.g. Department of Health, Department of Engineering), and the Common Council for the purpose of getting their input into the community development focus/priorities for the next 5-year Con Plan. Each annual plan cycle these groups are consulted with again and attend a public hearing on the needs and goals of the community.		
9	Agency/Group/Organization	Life Navigators		
	Agency/Group/Organization Type	Services-Children Services-Elderly Persons Services-Persons with Disabilities Services-Health Services-Education Services-Employment Services - Victims Health Agency		
	What section of the Plan was addressed by Consultation?	Non-Homeless Special Needs		

	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	The City of Wauwatosa emailed focus group invitations to 42 individuals and organizations, including the City's CDBG Committee, CDBG sub-recipients, relevant City Departments (e.g. Department of Health, Department of Engineering), and the Common Council for the purpose of getting their input into the community development focus/priorities for the next 5-year Con Plan. Each annual plan cycle these groups are consulted with again and attend a public hearing on the needs and goals of the community.		
10	Agency/Group/Organization	Easter Seals of SE Wisconsin		
	Agency/Group/Organization Type  What section of the Plan was addressed by	Services - Housing Services-Children Services-Elderly Persons Services-Persons with Disabilities Services-Health Services-Education Services-Employment Health Agency		
	Consultation?	Non-Homeless Special Needs		
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	The City of Wauwatosa emailed focus group invitations to 42 individuals and organizations, including the City's CDBG Committee, CDBG sub-recipients, relevant City Departments (e.g. Department of Health, Department of Engineering), and the Common Council for the purpose of getting their input into the community development focus/priorities for the next 5-year Con Plan. Each annual plan cycle these groups are consulted with again and attend a public hearing on the needs and goals of the community.		

11	Agency/Group/Organization	Housing Resources Inc.	
	Agency/Group/Organization Type	Housing	
		Services - Housing	
		Services-Children	
		Services-Elderly Persons	
		Services-Persons with Disabilities	
		Services-Persons with HIV/AIDS	
		Services-Victims of Domestic Violence	
		Services-homeless	
		Service-Fair Housing	
		Regional organization	
	What section of the Plan was addressed by	Housing Need Assessment	
	Consultation?	Public Housing Needs	
		Homelessness Strategy	
		Non-Homeless Special Needs	
		Anti-poverty Strategy	
	Briefly describe how the Agency/Group/Organization	The City of Wauwatosa emailed focus group invitations to 42 individuals and	
	was consulted. What are the anticipated outcomes of	organizations, including the City's CDBG Committee, CDBG sub-recipients,	
	the consultation or areas for improved coordination?	relevant City Departments (e.g. Department of Health, Department of	
		Engineering), and the Common Council for the purpose of getting their input into	
		the community development focus/priorities for the next 5-year Con Plan. Each	
		annual plan cycle these groups are consulted with again and attend a public	
		hearing on the needs and goals of the community.	

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

All stakeholders and practitioners involved with community development activities within the City were provided an invitation to participate in the consultation process.

### 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 Cara		Both identify goals of economic development/employment, access to supportive services, and
Continuum of Care		providing resources to safe, affordable housing as ways to prevent the risk of homelessness.

Table 3 - Other local / regional / federal planning efforts

#### Narrative

The Development Department at the City serves as the administrator the City's CDBG funding and works closely with neighboring municipalities (West Allis, City of Milwaukee, Milwaukee County) through the consortium, collaborating though meetings/communications on shared issues such as the AI, and interacting at trainings/conferences. The City is a member of the Continuum of Care (CoC), signs onto the NOFA application and attends COC monthly meetings to remain up to date on services that offered in the community. The City participated in the COC sponsored point in time homeless count and will continue to do so to track the population over time. Development Department staff also attend and staff regular meetings of the Community Development Authority, which serves as the City's Housing Authority and approval body of CDBG Economic Development funds. Outreach and marketing efforts to businesses and industry are increasing to ensure continued involved of these players in the development process. The City keeps abreast of activities at the State level through electronic communications and interaction at trainings and conferece events.

### 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

A Needs survey was conducted online during the months of July and August, 2013. The survey was accessible to the residents of the City of Wauwatosa on the City website, advertised in the local paper, and distributed through email. The survey consisted of 17 questions broken into the following categories:

- Demographic information
- Community needs assessment
- Public spending importance assessment
- Feedback regarding municipal changes
- Communication from City or County officials regarding CDBG and HOME programs
- Recommendations for the use of public funds in Wauwatosa

Public Notices soliciting public input were placed on the City's website and distributed to community-based organizations. Public Notices for the Public Hearings were published in the official City newspaper, TosaNow. All CDBG Public Hearings are held in buildings which are handicap accessible to allow for access to elderly persons and persons with disabilities.

For annual plan PY 2019, the first Public Hearing was held on October 24, 2018 during a meeting with the Community Development Block Grant Committee and a second Public Hearing was held on October 29, 2018 to present the recommended community development activities to the general public and to solicit feedback. This input sets the direction for goal-setting and priority projects.

Financial Affairs Committee and Common Council had a public hearing, reviewed and approved CDBG-CV funding, 2019 Annual Plan Amendments and updates to the Citizen Participation Plan on May 12, 2020. A notice was posted in the WEST NOW paper to identify the 5-day comment period. Amendments were posted on the City website.

Annual Action Plan 2019

### **Citizen Participation Outreach**

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

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
1	Public Hearing	Non- targeted/broad community	Ten individuals attend the public open house on October 9, 2013 to provide input on community activities. They represented organizations working in the community that have received or intend to apply to received CDBG funding to assist LMI populations in the City. For annual plan PY 2016, the first Public Hearing was held on September 14th, 2015 during a meeting with the Community Development Block Grant Committee and a second Public Hearing was held on September 21, 2015	Comments provided generally fell into one of four groups: the need for services to assist the City's senior population, the need to assist activities that serve people with disabilities, the need for emergency relief services to help people in tough economic times, and the need to rehab housing units in order to maintain a quality housing supply. Each commenter iterated tight or declining budgets/resources for providing	All comments were accepted and considered in the development of the Con Plan and Annual Plan.	
OMB Control No:	2506-0117 (exp. 06/30/2018	)	to present the Action Plane recommende 2019 community development activities to the	services coupled with an increased and/or growing demand for services.	22	

### Table 4 – Citizen Participation Outreach

### **Expected Resources**

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

#### Introduction

Wauwatosa receives an annual allocation of CDBG funding from HUD that remains fairly consistent from year to year. In addition, the WRLF has program income from economic development loans that can be allocated to make additional loans. If there are remaining funds from completed projects from previous years, those funds can be reallocated to existing projects or applied to a current year project for an approved organization.

### **Anticipated Resources**

Program	Source of	Uses of Funds	Expe	ected Amount	Available Yea	r 1	Expected	Narrative Description
	Funds		Annual	Program	Prior Year	Total:	Amount	
			Allocation:	Income: \$	Resources:	\$	Available	
			\$		\$		Remainder	
							of ConPlan	
							\$	
CDBG	public -	Acquisition						
	federal	Admin and						
		Planning						
		Economic						
		Development						
		Housing						
		Public						
		Improvements						
		Public Services	969,886	12,000	0	981,886	0	
Other	public -	Other						Cares Act funds to the FY 2019
	federal		795,942	0	0	795,942	0	Annual Action Plan

Table 5 - Expected Resources - Priority Table

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

Other than CDBG funds, federal funds such as HOME and Section 8 are allocated to Milwaukee County who in turn administers these funds on behalf Wauwatosa and other municipalities in the county. The City also received Federal Brownfield Assessment funds to assist businesses/property owners in redevelopment projects.

The individual organizations and programs that the City funds with CDBG money are able to leverage additional resources from the private and non-profit sector in order to fully implement their projects. Each organization that the city allocates CDBG funds to relies on other funding sources to operate and receives private donations or other grants.

The City of Wauwatosa only directly receives HUD funds from the CDBG Program and this program does not have any matching requirements.

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

The Wauwatosa Senior Center conducts operations out of the Muellner Building located in Hart Park, which is a publicly owned land and a public building.

#### Discussion

Services and programs are targeted to LMI people/households City-wide.

## **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	Increase the supply	2014	2018	Affordable	Wauwatosa	Housing	CDBG:	Homeowner Housing
	of standard			Housing	CDBG		\$311,919	Rehabilitated: 30
	affordable housing				Entitlement			Household Housing Unit
					Jurisdiction			
2	Provide services to	2014	2018	Non-Homeless	Wauwatosa	Public Services	CDBG:	Public service activities
	targeted populations			Special Needs	CDBG		\$139,689	other than Low/Moderate
				Non-Housing	Entitlement			Income Housing Benefit:
				Community	Jurisdiction			9000 Persons Assisted
				Development				
3	Improve/develop	2014	2018	Non-Housing	Wauwatosa	Public	CDBG:	Public Facility or
	infrastructure			Community	CDBG	Infrastructure/Facilities	\$309,662	Infrastructure Activities
				Development	Entitlement			other than Low/Moderate
					Jurisdiction			Income Housing Benefit:
								770 Persons Assisted
4	Develop economy	2014	2018	Non-Housing	Wauwatosa	Economic Development	CDBG:	Public service activities
	and employment			Community	CDBG		\$30,000	other than Low/Moderate
				Development	Entitlement			Income Housing Benefit: 30
					Jurisdiction			Persons Assisted
								Businesses assisted: 5
								Businesses Assisted

Sort	Goal Name	Start	End	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
Order		Year	Year					
5	Provide strong	2014	2018	Administration	Wauwatosa	Administration and	CDBG:	Other: 1 Other
	program planning				CDBG	Planning	\$178,616	
	and administration				Entitlement			
					Jurisdiction			

Table 6 – Goals Summary

### **Goal Descriptions**

1	Goal Name	Increase the supply of standard affordable housing
	Goal Description	
2	Goal Name	Provide services to targeted populations
	<b>Goal Description</b>	
3	Goal Name	Improve/develop infrastructure
	Goal Description	
4	Goal Name	Develop economy and employment
	Goal Description	
5	Goal Name	Provide strong program planning and administration
	<b>Goal Description</b>	

### AP-35 Projects - 91.420, 91.220(d)

#### Introduction

The City's CDBG program focuses on serving LMI populations in need of supportive and housing services. Overall activities are conducted city-wide and there is an emphasis places on services for seniors and people with disabilities, housing rehabilitation programs, and economic development activities that create jobs. As an entitlement community, Wauwatosa receives approximately the same annual CDBG allocation. While meeting goals to provide services is accomplished each year, it is more difficult to meet housing goals that necessitate overcoming obstacles to affordable housing. Economic development activities have been successful in recent years as well and the City will continue to plan for such activities moving forward.

#	Project Name
1	Economic Development
2	Senior Services
3	Program Administration & Planning
4	Fair Housing
5	Services for people with HIV/AIDS
6	Services for people with disabilities
7	Housing
8	Rehab of Public Facilities
9	Emergency Food Services
19	CV-Emergency Food Services
20	CV- Services for people with disabilities
21	CV-Services for people with HIV/AIDS

Table 7 - Project Information

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

Allocations are focused on serving LMI populations and are geographically distributed throughout the community. Seniors and people with disabilities represent a significant portion of the City's population living below the poverty level, so priorities are assigned for allocating investments to activities that reach these populations in the community. Commercial districts and businesses are scattered throughout the city. Economic development strategies are identified in order to fund activities and initiatives that create/retain LMI jobs and promote economic development in business districts.

### **AP-38 Project Summary**

**Project Summary Information** 

1	Project Name	Economic Development
	Target Area	Wauwatosa CDBG Entitlement Jurisdiction
	Goals Supported	Provide services to targeted populations  Develop economy and employment
	Needs Addressed	Economic Development
	Funding	CDBG: \$42,000
	Description	Provide loans (and limited grants) to new or expanding businesses that retain or create jobs filled by low/moderate income individuals. Funding and approvals are administered by the Community Development Authority. WWBIC provides training and technical assistance for entrepreneurs and prospective entrepreneurs.
	Target Date	12/31/2019
	Estimate the number and type of families that will benefit from the proposed activities	30 LMI individuals
	Location Description	1533 N. River Center Drive,
	Planned Activities	Provide forgiovable loans to businesses that create new jobs filled with 51% LMI individuals.
		Provide training and technical assistances to entrepreneurs and prospective entrepreneurs.
2	Project Name	Senior Services
	Target Area	Wauwatosa CDBG Entitlement Jurisdiction
	Goals Supported	Provide services to targeted populations
	Needs Addressed	Public Services
	Funding	CDBG: \$112,089
	Description	Provide services to target populations but funding program operations and administration of non-profits that serve seniors in the community.
	Target Date	12/31/2019
	Estimate the number and type of families that will benefit from the proposed activities	335 LMI senior individuals

	Location Description	Senior Center,7300 West Chestnut Street, Wauwatosa 53213
		City-wide, Wauwatosa
	Planned Activities	Provide funds to the senior center and Interfaith organizations to offer quality of life services for seniors.
3	Project Name	Program Administration & Planning
	Target Area	Wauwatosa CDBG Entitlement Jurisdiction
	Goals Supported	Provide strong program planning and administration
	Needs Addressed	Administration and Planning
	Funding	CDBG: \$141,886
	Description	Funds cover staff salaries for administering the CDBG Program, training / conferences, and planning studies.
	Target Date	12/31/2019
	Estimate the number and type of families that will benefit from the proposed activities	
	Location Description	
	Planned Activities	Funds used to cover staff costs for program administration and training; planning studies.
4	Project Name	Fair Housing
	Target Area	Wauwatosa CDBG Entitlement Jurisdiction
	Goals Supported	Provide strong program planning and administration
	Needs Addressed	Housing
	Funding	CDBG: \$36,730
	Description	Funds support organizations that affirmatively further fair housing in the community.
	Target Date	12/31/2019
	Estimate the number and type of families that will benefit from the proposed activities	100 clients. Unknown estimate of LMI clients at time of application.  Mandated program to ensure fair housing compliance.
	Location Description	Wauwatosa
	Planned Activities	Provide services that affirmatively futher fair housing in the community.

5	Project Name	Services for people with HIV/AIDS
	Target Area	Wauwatosa CDBG Entitlement Jurisdiction
	Goals Supported	Provide services to targeted populations
	Needs Addressed	Public Services
	Funding	CDBG: \$15,000
	Description	Provide services to individuals living with HIV/AIDS that include housing services, meals/food pantry, support groups, and social activities.
	Target Date	12/31/2019
	Estimate the number and type of families that will benefit from the proposed activities	28 LMI individuals
	Location Description	624 N. 103rd Street, Wauwatosa
	Planned Activities	Elena's House is a transitional, end of life home for people living with HIV/AIDS.
6	Project Name	Services for people with disabilities
	Target Area	Wauwatosa CDBG Entitlement Jurisdiction
	Goals Supported	Improve/develop infrastructure
	Needs Addressed	Public Infrastructure/Facilities
	Funding	CDBG: \$17,662
	Description	Funds to support Life Navigators, serving families and individuals with disabilities.
	Target Date	12/31/2019
	Estimate the number and type of families that will benefit from the proposed activities	160 LMI individuals
	<b>Location Description</b>	Life Navigators - 7203 W. Center Street, Wauwatosa
	Planned Activities	Building improvements specifically for the Consumer & Family Resource Room.
7	Project Name	Housing
	Target Area	Wauwatosa CDBG Entitlement Jurisdiction
	Goals Supported	Increase the supply of standard affordable housing

	Needs Addressed	Housing
	Funding	CDBG: \$311,919
	Description	Programs provide housing services, rehab projects to LMI households.
	Target Date	12/31/2019
	Estimate the number and type of families that will benefit from the proposed activities	Up to 30 LMI owner-occupied households.
	Location Description	City-wide Wauwatosa
	Planned Activities	Homeowner rehab program for emergency and accessibility rehab work.
8	Project Name	Rehab of Public Facilities
	Target Area	Wauwatosa CDBG Entitlement Jurisdiction
	Goals Supported	Improve/develop infrastructure
	Needs Addressed	Public Infrastructure/Facilities
	Funding	CDBG: \$292,000
	Description	Funds are used to rehab buildings that support LMI populations the community including seniors and people with disabilities.
	Target Date	12/31/2019
	Estimate the number	131 LMI individuals
	and type of families that will benefit from	113 LMI individuals
	the proposed activities	
	Location Description	Lutheran Home - 7500 W. North Avenue, Wauwatosa
		Luther Manor - 4545 N 92nd Street, Wauwatosa
		Â
	Planned Activities	Infrastructure improvements to health facilities that serve seniors and people with disabilities.Â
9	Project Name	Emergency Food Services
	Target Area	Wauwatosa CDBG Entitlement Jurisdiction
	Goals Supported	Provide services to targeted populations

	Needs Addressed	Public Services
	Funding	CDBG: \$12,600
	Description	Support organizations that supply emergency food and basic needs supplies to low income individuals and families.
	Target Date	12/31/2019
	Estimate the number and type of families that will benefit from the proposed activities	627 LMI households
	Location Description	Tosa Community Food Pantry - 7474 Harwood Avenue, Wauwatosa, 53213
		Tosa Cares - 12012 W. North Avenue, Wauwatosa, 53226
	Planned Activities	Provide funds to the Food Pantry and Tosa Cares to purchase emergency food supplies for LMI households.
10	Project Name	CV-Emergency Food Services
	Target Area	
	<b>Goals Supported</b>	Provide services to targeted populations
	Needs Addressed	Public Services
	Funding	CDBG-CV: \$16,000
	Description	Support organizations that supply emergency food and basic needs supplies to low income individuals and families during the coronavirus pandemic.
	Target Date	12/31/2020
	Estimate the number and type of families that will benefit from the proposed activities	627 LMI
	Location Description	
	Planned Activities	
11	Project Name	CV- Services for people with disabilities
	Target Area	Wauwatosa CDBG Entitlement Jurisdiction
	Goals Supported	Provide services to targeted populations
	Needs Addressed	Public Services

	Funding	CDBG-CV: \$32,002
	Description	Funds to support emergency pandemic needs for Life Navigators, serving families and individuals with disabilities.
	Target Date	12/31/2020
	Estimate the number and type of families that will benefit from the proposed activities	500 LMI
	Location Description	7203 W. Center Street, Wauwatosa, 53210
	Planned Activities	Provide needed support services, emergency supplies and intervention services in response to COVID-19.
12	Project Name	CV-Services for people with HIV/AIDS
	Target Area	Wauwatosa CDBG Entitlement Jurisdiction
	Goals Supported	Provide services to targeted populations
	Needs Addressed	Public Services
	Funding	CDBG-CV: \$10,000
	Description	Provide emergency pandemic support services to individuals living with HIV/AIDS that include housing services, meals/food pantry, support groups, and social activities.
	Target Date	12/31/2020
	Estimate the number and type of families that will benefit from the proposed activities	28 LMI
	<b>Location Description</b>	624 N 103rd Street, Wauwatosa
	Planned Activities	Provide emergency pandemic support services to individuals living with HIV/AIDS that include housing services, meals/food pantry, support groups, and social activities.

### 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

Businesses that are approved for economic development loans or grants are geographically distributed throughout the city. The remaining 2018 projects are conducted by various organizations that have a specific location within the city (with the exception of the office of Community First and WWBIC located in Milwaukee). All organizations serve Wauwatosa residents community-wide, along with some non-residents as well, and primarily those who are LMI with their CDBG funds at the locations below:

- Community Development Authority 7725 W. North Avenue
- Life Navigators 7203 W. Center Street
- Elena's House 624 N. 103rd Street
- Interfaith 1529 Wauwatosa Avenue
- Tosa Cares 12012 W. North Avenue
- Tosa Food Pantry 7474 Harwood Avenue
- Wauwatosa Senior Center 7300 Chestnut Street
- The Lutheran Home 7500 W North Avenue
- Luther Manor 4545 N 92nd Street
- Wisconsin Women's Business Initiative Corporation (WWBIC) 2745 W MLK Drive, Milwaukee
- Community First 3942 W Lisbon, Milwaukee, WI 53208

#### **Geographic Distribution**

Target Area	Percentage of Funds
Wauwatosa CDBG Entitlement Jurisdiction	100

**Table 8 - Geographic Distribution** 

#### Rationale for the priorities for allocating investments geographically

Commercial districts and businesses are scattered throughout the city, but the main focus is on supporting business in the Village and North Avenue Corridor, districts where CDBG funds were used to complete redevelopment plans. The City completed a similar study for the the midtown section of the North Avenue Corridor economic development strategies will be identified in order to fund activities and initiatives that create/retain LMI jobs and promote economic development. The City's Economic Development Division, along with WWBIC, will use CDBG funds to assist businesses throughout the City that hire LMI employees.

Allocations for the remaining projects are focused on serving LMI populations and are geographically distributed throughout the community. Seniors and people with disabilities represent a significant portion of the City's population living below the poverty level, so priorities have been assigned for allocating investments to activities that reach these populations in the community.

#### Discussion

As eligible projects arise, infrastructure activities will be undertaken in the city's LMAs; none are scheduled or funded in 2019.

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

#### Introduction

Wauwatosa works to affirmatively further fair housing in conjunction with the Metropolitan Milwaukee Fair Housing Council and will be undertaking an updated Analysis of Impediments with other entities in the County in 2019. Work in underway.

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

Wauwatosa completed a City-wide comprehensive housing study in 2016 that investigated affordability and policy issues. Recommendations from the study will be incorporated into CDBG funding strategies and program goals. Recommendations from the updated AI will also be priortized and undertaken.

#### Discussion

In addition, the city provides continued support to Elena's House, a transitional living facility for LMI people with HIV / AIDS. In 2019, CDBG funds will also be used for renovation/rehabilitation, accessibilty modifications and code compliance updates for single-family home improvements for low-income households through the Community First organization.

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

#### Introduction

Each of the programs and activities described in this Plan is designed to meet one of three major objectives (Decent Housing, Suitable Living Environment, or Economic Opportunity) and to contribute accomplishments under one or more of three categories of outcomes (increase availability/accessibility, increase affordability, increase sustainability).

#### Actions planned to address obstacles to meeting underserved needs

Actions include the funding of Milwaukee County Home Consortium's Home Repair Loan, Rent Assistance, and First-Time Homebuyers programs, along with conducting outreach and distributing information and data about the number of people who access these programs. In addition, the city will offer funding to provide a transitional living facility for LMI people with HIV / AIDS. CDBG funds will also be used for renovation/rehabilitation of subsidized housing developments. CDBG funding will be available for funding a senior center and other activities/services to improve/maintain the quality of life and personal well-being of Wauwatosa's senior population. The city will continue to provide assistance for the continued operation of family support and crisis intervention services for persons with disabilities to improve health, safety and work/life experiences.

### Actions planned to foster and maintain affordable housing

Wauwatosa will support the rehabilitation/renovation of subsidized housing units that are in great need of repairs and to home repairs for LMI households through the Health Department and Community First programs. In addition, the City of Wauwatosa will continue to support programs that provide services that create affordable housing options for the clients they serve. In addition, the use of CDBG funds for housing unit rehabilitation projects will be promoted and encouraged when possible, in order to create more affordable housing options in the city. Outreach, technical assistance and additional support will be offered to projects that include affordable housing components.

#### Actions planned to reduce lead-based paint hazards

Wauwatosa's Human Health Hazard Ordinance authorizes the Wauwatosa Health Department to issue orders to abate lead hazards in homes where a lead-poisoned child resided. The lead certified health department staff conducts investigations and follow-up inspections to verify the hazard, write clean-up orders and determine compliance by the date specified on the orders. Citations will be issued if clean-up is not completed when ordered.

Grants are available to LMI households as part of the Health Department's weatherization grant program. Priority is given to those with greatest need and with young children residing in the home and to daycares.

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

Housing: The City of Wauwatosa will continue to support and coordinate with the Milwaukee County Home Consortium to provide home repair grants/loans, rental assistance and first-time homebuyers assistance to Wauwatosa families in order to relieve these financial burdens for LMI families. Assistance to other housing programs for housing rehab activities maintain available and safe housing units while covering the cost burden for LMI households/people. In addition, the City will continue to uphold and enforce zoning ordinances that maintain small-size residential lots and allow for high-density, multifamily developments that can more easily accommodate LMI households.

**Economic Development:** The City will administer grants and low-interest loans to businesses for the purpose of job creation for LMI individuals, thereby working to alleviate poverty for these people.

**Public/Social Services:** The City provides CDBG funds to non-profit organizations that provide emergency food assistance to those in need, alleviating some of the burden of obtaining this basic need so families can focus resources on other needs.

### Actions planned to develop institutional structure

To develop institutional structure, planning staff will continue to administer CDBG program duties and enhance coordination with the various institutions with which it works – City government, HUD, subrecipients and community groups and citizens. Further actions will be taken to refine the structure of annual application, reporting and monitoring processes, such as updating and creating forms/checklists/timelines/notices and distributing timely information to all relevant entities. Actions to clarify and streamline processes will provide an organized, defined institutional structure. Staff is also creating and maintaining a procedures reference manual that defines the various components and structure of the CDBG program.

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

The City staff will foster a consistent relationship and increase communication with Milwaukee County and the administration of the City's HOME funds. Continued input will be solicited from the Wauwatosa Health Department. Staff, when appropriate and possible, will seek new avenues and partnerships with agencies for meeting/expanding underserved needs in the community. Staff maintains regular communication with subrecipients throughout the year.

#### Discussion

...

### **Program Specific Requirements**

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

#### Introduction

Wauwatosa will receive \$969,886 in CDBG funds in 2019. Additionally, program income from the revolving loan fund will be available for new loans. The majority of funds will be allocated to serve LMI populations through public service activities (capped at 15%) and housing and economic development activities. Approximately 20% of funds will be expended for program administration, planning, and fair housing activities.

# 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	12,000
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:	12,000

### **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.

80.00%

Discussion
In 2019, the only allocated funds that will not directly serve LMI populations are those set aside for program administration and fair housing activities (although some people served by MMFHC may be LMI) that fall under the 20% Administration cap. Program income from the revolving loan fund will be available for new economic development loans in 2019.