

Executive Summary

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

1. Introduction

The 2021 Action Plan provides a specific roadmap of activities to meet strategic goals with a basis for assessing the City's performance. Once in place, the Plan provides guidance for the City's community development investment decisions that is consistent with public concerns and needs. This Action Plan outlines the activity for the fifth year of the 5-year Consolidated Plan.

For the 2021 Program Year, the City of Radford estimates it will receive \$182,495 from the Department of Housing and Urban Development. In the event that the actual amount received from HUD is higher or lower than anticipated, the City will adjust the funding amounts and will ensure that we remain in compliance with the regulatory requirements for funding allocations to certain activities.

2. Summarize the objectives and outcomes identified in the Plan

This could be a restatement of items or a table listed elsewhere in the plan or a reference to another location. It may also contain any essential items from the housing and homeless needs assessment, the housing market analysis or the strategic plan.

The overall goal is to develop a viable community by providing decent housing, expanded economic opportunities and a suitable living environment, primarily for low- and moderate-income persons. HUD administers these programs on a national basis and awards grants to entitlement communities each year on a formula basis. The City of Radford in turn awards grants to local nonprofits as well as providing direct services to residents through CDBG-funded programs.

This Action Plan covers the period of July 1, 2021 to June 30, 2022;

Objectives:

- Continued improvement of the City's public infrastructure, beautification enhancements, continued support to local agencies who help low-to-moderate residents and strengthening the neighborhoods to enhance the quality of life for the citizens of Radford.

Outcomes:

- Beautification enhancements to continue increasing the tree canopy and aesthetics throughout the City.
- Weatherization and Emergency Home Repair Program
- Improve the Dobbins/Oakly Park located between 16th and 17th Street
- Infrastructure Improvements along East Main Business District and Third Avenue Parking Lot.
- Support to our local agencies that provide services to LMI children with an afterschool programs and food insecurities. Support to agencies that assist families who are at risk of becoming homeless.

3. Evaluation of past performance

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

The City of Radford achieved several goals that was set forth in the 2017 Consolidated Plan and 2020 Action Plan. Infrastructure improvements were made to the water lines in the neighborhoods of Cowan Street and Grandview Dr. The City also was able to support a number local agencies that provide services to LMI children. Funding also assisted with families who are close to becoming homeless throughout the Homeless Intervention Program and Emergency Shelter.

4. Summary of Citizen Participation Process and consultation process

Summary from citizen participation section of plan.

Prior to the development of the Action Plan, public input sessions were held on March 9th and 10th to give the citizens an opportunity to offer input on the activities for the 2021 Action Plan. The City also invited citizens to review and comment on the Action Plan over a 30 day comment period. Notification was printed in the local daily newspaper on March 31, 2021 and the Action Plan was posted to the City's website.

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.

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

7. Summary

The Action Plan has been developed using an estimate of the amount of 2021 CDBG allocation that the City plans to receive from HUD. Funding amount revisions will be made to the activities in the Action Plan should the exact amount of funding awarded by HUD differ from the estimate. The activities with the highest funding amounts are the highest priority activities.

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
CDBG Administrator		City of Radford

Table 1 – Responsible Agencies

Narrative

HUD has designated the City of Radford as an entitlement community and as such it receives a direct allocation of Community Development Block Grant (CDBG) funds.

Consolidated Plan Public Contact Information

For more information call:

Melissa Skelton, City of Radford Community Development Director

(540)267-3188

Melissa.Skelton@radfordva.gov

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

1. Introduction

The City of Radford works in partnership with local public service providers, community agencies, groups, organizations, and citizens to evaluate community needs and set goals for the plan period. The City of Radford's Consolidated Plan outlines the priorities and goals which guide the allocation of funds of the five year period. The funds allocated for the 2021 grant application cycle are included in this PY 2021 Action Plan.

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

City Staff continued its participation in the regional housing study that has compiled citizen input and housing market data to provide a detailed understanding of the regional and local housing market within the New River Valley. It will serve as a foundation for planning of future employment, housing and infrastructure development activities, providing us with data and strategies that will help to guide investment in housing and rehabilitation projects. The study has taken longer than anticipated due to COVID 19 restrictions.

We continue to actively participate in the Livability Initiative, as it is a planning tool that provides opportunities for the residents within the New River Valley to develop a vision for the future and develop strategies that businesses, community organizations, local governments, and individuals can use to make this future vision a reality.

City Staff takes part in the ongoing update of the Housing Service Guide and Affordable Housing list that NRV HOME Consortium led as a regional effort to create a resource to assist those seeking information about affordable housing. The guide provides a list of different housing services throughout the New River Valley.

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 New River Valley Housing Partnership is the entity responsible for the local Continuum of Care. The CoC meets on a monthly basis for the purpose to assist in the coordination, development, and evaluation of services and housing for homeless and at-risk of homeless persons with housing needs through planning, education and advocacy.

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

N/A

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

Table 2 – Agencies, groups, organizations who participated

1	Agency/Group/Organization	Women's Resource Center
	Agency/Group/Organization Type	Housing Services-Victims of Domestic Violence Services-homeless Services - Victims
	What section of the Plan was addressed by Consultation?	Homeless Needs - Families with children Domestic Violence
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Staff has ongoing conversations with WRC to ensure that funding is being utilized as anticipated and is the need being met.
2	Agency/Group/Organization	New River Community Action
	Agency/Group/Organization Type	Services - Housing Services-homeless
	What section of the Plan was addressed by Consultation?	Homelessness Strategy
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	NRCA was consulted for data pertaining to homeless needs and those at risk of homelessness.
3	Agency/Group/Organization	Radford Fairlawn Daily Bread
	Agency/Group/Organization Type	Services-Elderly Persons
	What section of the Plan was addressed by Consultation?	Food Bank

	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	
4	Agency/Group/Organization	City of Radford
	Agency/Group/Organization Type	Other government - Local
	What section of the Plan was addressed by Consultation?	Grantee
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	In development of the Action Plan, Two public input meetings were provided to the community at large soliciting applications for funding. Staff also met with directors of the following departments to determine needs and projects; Building, Planning, City Manager, Water/Wastewater, Engineering, Parks and Recreation

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

The City provided for limited consultation efforts due to the small amount of grant funds being recieved and the need to focus the limited resources to viable projects

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

Name of Plan	Lead Organization	How do the goals of your Strategic Plan overlap with the goals of each plan?
Continuum of Care	New River Housing Partners	Ensure that all regional housing providers are working in collaboration with one another to address homelessness.

Table 3 - Other local / regional / federal planning efforts

Narrative

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

Prior to the development of the Action Plan, A public notice was posted in the Radford News Journal and City's website on March 3, 2021 seeking proposals for Public Service Funds.

Two public input sessions were held on March 9,2021 and March 10, 2021 to give the citizens an opportunity to offer input on how to utilize funding for the upcoming program year.

A 30-day public hearing review was held from March 31, 2021 to May 7, 2021.

The City of Radford engaged community agencies, groups, organizations, and citizens in the plan development process. Agencies and organizations are asked to review the City's goals outlined in the Action Plan and recommend programs that support those goals. Copies of the Action Plan were made available on the City's website, along with a copy City Manager's Office for public input. Citizens are asked to review the proposed plan and activities and submit their comments. The City of Radford makes every attempt to encourage the participation of all citizens.

Citizen Participation Outreach

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
1	Internet Outreach	Non-targeted/broad community	2 public input meetings were scheduled, one citizen was in attendance	The citizen came to discuss the potential funding of their 501 3c that is still pending approval.		www.radfordva.gov
2	Newspaper Ad	Non-targeted/broad community	2 public input meetings were scheduled, one citizen was in attendance	The citizen came to discuss the potential funding of their 501 3c that is still pending approval.		
3	Public Meeting	Non-targeted/broad community	a public hearing was held during Radford City Council's April 26, 2021 meeting			
4	30-day Public Review	Non-targeted/broad community	A copy of PY 2021 was provided via the City's website for a 30 comment period			

Table 4 – Citizen Participation Outreach

Expected Resources

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

Introduction

The CDBG allocation expected for Program Year 2021 is \$182,495. With the limited amount of available funding, the City targets specific activities that will have the most impact on many of the needs in the City of Radford, similarly to how it has been allocated in past program years.

Anticipated Resources

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
CDBG	public - federal	Acquisition Admin and Planning Economic Development Housing Public Improvements Public Services	182,495	0	45,000	227,495	0	The amount is based on estimated Program 2021 funding allocations. We anticipate rolling about \$45000 from prior year allocations.

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
Other	public - federal	Admin and Planning Economic Development Housing Public Improvements Public Services Other	0	0	0	0	0	

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

The City does not expect to use State-funding sources to address the activities in this Consolidated Plan.

The City will provide all necessary oversight and project management staffing for the implementation of these programs. Because of the limited funds available for administration and planning, it is expected that a significant portion of these staffing hours will be absorbed by the City’s general operations budget.

City staff within Public Works and the Recreation Department will provide in-kind work on the Dobbin's/Oakley Park and East Main/Third Ave Parking lot, in order to "stretch" the resources.

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

N/A

Discussion

The City will continue to identify ways to leverage private funds to address the goals outlined in the Consolidated Plan.

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	Support Non-Homelessness Needs	2017	2021	Youth Services	Citywide	Youth Services	CDBG: \$14,350	Public service activities other than Low/Moderate Income Housing Benefit: 350 Persons Assisted
2	Emergency Home Repair	2017	2021	Emergency Home Repair	Citywide	Maintain existing affordable housing	CDBG: \$25,000	Public service activities for Low/Moderate Income Housing Benefit: 5 Households Assisted
3	Neighborhood Revitalization	2017	2021	Non-Housing Community Development			CDBG: \$118,600	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 600 Persons Assisted
4	Planning and Administration	2017	2021	Planning and Administration			CDBG: \$36,450	
5	Prevent and End Homelessness	2017	2021	Homeless		Prevention of Homelessness Domestic Violence	CDBG: \$13,000	Homeless Person Overnight Shelter: 35 Persons Assisted Homelessness Prevention: 4 Persons Assisted
6	Neighborhood Beautification	2017	2021	Non-Housing Community Development	Citywide		CDBG: \$10,000	Other: 1 Other

Table 6 – Goals Summary

Goal Descriptions

1	Goal Name	Support Non-Homelessness Needs
	Goal Description	Will support local non profits provide who provide assistance to LMI children who are food insecure and support local Meals on Wheels program
2	Goal Name	Emergency Home Repair
	Goal Description	
3	Goal Name	Neighborhood Revitalization
	Goal Description	Provide enhancements to Dobbins/Oakly Park located between 16th & 17th Street. Also, to provide public improvements to the East Main Business District and Third Avenue parking lot.
4	Goal Name	Planning and Administration
	Goal Description	
5	Goal Name	Prevent and End Homelessness
	Goal Description	Funding will be used to assist 2 local nonprofits with their Homeless Intervention program and Emergency Shelter for domestic violence survivors.
6	Goal Name	Neighborhood Beautification
	Goal Description	

AP-35 Projects - 91.420, 91.220(d)

Introduction

CDBG funds are allocated to organizations that provide low-moderate income households with housing and services. Funds were allocated through an application process and the projects were based on the priorities that were outlined in the 2017-2021 Consolidated Plan.

Program Years 2021 will focus on Public Infrastructure Improvements in the East Main Street/Third Ave Parking lot, beautification, emergency home repair/weatherization program, EDA's facade program and continued support to the sub-recipients as we have in previous years.

#	Project Name
1	Planning & Administration
2	Public Infrastructure Improvement
3	Beautification
4	Facade Improvement
5	Emergency Housing Repair
6	Subrecipients

Table 7 – Project Information

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

Program Year 2021 funds were allocated according to the priorities outlined in the 2017-2021 Consolidated Plan. The primary obstacle to addressing underserved need in the community continues to be the lack of funding.

AP-38 Project Summary
Project Summary Information

Community Development Systems
Integrated Disbursement & Information System (IDIS)

User: C90877
Role: Grantee
Organization: RADFORD
- Switch Profile
- Logout

Activity
- Add
- Search
- Search HOME/HTF
- Review
- CDBG Cancellation

Project
- Add
- Search
- Copy

Consolidated Plans
- Add
- Copy
- Search

Annual Action Plans
- Add
- Copy
- Search

Consolidated Annual Performance Evaluation Report
- Add
- Search

Utilities
- Home
- Data Downloads
- Print Page
- Help

Links
- Contact Support
- Rules of Behavior
- CPD Home
- HUD Home

Plans/Projects/Activities Funding/Drawdown Grant Grantee/PJ Admin

You have **2 CDBG** activities that have been flagged. Click on the number to go to the review page.

Annual Action Plan (2021-Version 1)

AP-38 Project Summary

[Return to Annual Action Plan Projects](#)

Project Summary Information

No.	Project	Goals Supported	Geographic Areas	Needs Addressed
1	Planning & Administration	Planning and Administration		
	Description	Funding will be utilized to assist with the downtown planning grant and update ordinance		
	Target Date for Completion			
	Estimate the number and type of families that will benefit from the proposed activities (additional information for this discussion may be available on the AP-36 Project Detail screen)	Administration activities do not produce beneficiary data		
	Location Description (additional information for this discussion may be available on the AP-36 Project Detail screen)			
2	Planned Activities (additional information for this discussion may be available on the AP-36 Project Detail screen)			
	Public Infrastructure Improvement - East Main/Third Ave Parking	Support Non-Homelessness Needs Neighborhood Revitalization		
	Description	The City will work on enhancement to the East Main Business Corridor and TI lot. Enhancements to include recommendation from the Regional Commission Downtown Planning Grant, for sidewalk improvements and traffic calming street improvements to the Third Avenue Parking lot.		
	Target Date for Completion			
	Estimate the number and type of families that will benefit from the proposed activities (additional information for this discussion may be available on the AP-36 Project Detail screen)			
3	Location Description (additional information for this discussion may be available on the AP-36 Project Detail screen)			
	Planned Activities (additional information for this discussion may be available on the AP-36 Project Detail screen)			
	Beautification	Neighborhood Beautification	Citywide - Other	
	Description	Funding will be utilized to assist with our Tree City USA designation and enhance Main District		
	Target Date for Completion			
4	Estimate the number and type of families that will benefit from the proposed activities (additional information for this discussion may be available on the AP-36 Project Detail screen)	The entire community can benefit from having a community invest in its urban		
	Location Description (additional information for this discussion may be available on the AP-36 Project Detail screen)			
	Planned Activities (additional information for this discussion may be available on the AP-36 Project Detail screen)			
4	Facade Improvement	Support Non-Homelessness Needs		
	Description	Funding will be used to support the City's Economic Development Authorities		
	Target Date for Completion			
	Estimate the number and type of families that will benefit from the proposed activities (additional information for this discussion may be available on the AP-36 Project Detail screen)			
	Location Description			

	(additional information for this discussion may be available on the AP-36 Project Detail screen)		
	Planned Activities (additional information for this discussion may be available on the AP-36 Project Detail screen)		
5	Emergency Housing Repair	Emergency Home Repair	
	Description	Funding will be used to assist at least 5 homeowners that need emergency re weatherization	
	Target Date for Completion		
	Estimate the number and type of families that will benefit from the proposed activities (additional information for this discussion may be available on the AP-36 Project Detail screen)		
	Location Description (additional information for this discussion may be available on the AP-36 Project Detail screen)		
	Planned Activities (additional information for this discussion may be available on the AP-36 Project Detail screen)		
6	Subrecipients	Support Non-Homelessness Needs	Prevention of Homeless Youth Services Domestic Violence
	Description	Funding will be utilized to assist the following public service agencies: Wome New River Community Action, Bean's and Rice, Bobcat Back Pack program ar Daily Bread	
	Target Date for Completion		
	Estimate the number and type of families that will benefit from the proposed activities (additional information for this discussion may be available on the AP-36 Project Detail screen)		
	Location Description (additional information for this discussion may be available on the AP-36 Project Detail screen)		
	Planned Activities (additional information for this discussion may be available on the AP-36 Project Detail screen)		
7	Public Infrastructure Improvement - Dobbins Park/Oakley Field	Support Non-Homelessness Needs Neighborhood Revitalization	
	Description	Dobbin's Park/Oakley field located between 16th & 17th Street, has been ide enhancements to the baseball field and the playground equipment	
	Target Date for Completion		
	Estimate the number and type of families that will benefit from the proposed activities (additional information for this discussion may be available on the AP-36 Project Detail screen)	Approximately 600 people live within 1/4 mile of the location of Dobbins Park could benefit from the enhancements.	
	Location Description (additional information for this discussion may be available on the AP-36 Project Detail screen)		
	Planned Activities (additional information for this discussion may be available on the AP-36 Project Detail screen)		

[Return to Annual Action Plan Projects](#)

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

The City of Radford is located in the New River Valley of Southwestern Virginia, with City limits consisting of 9.63 square miles. The Weldon Cooper Center for Public Service estimate the population for the City's to be at 18,041, this is a 10 % increase from the 2010 Census. The City of Radford's overall LMI is over 64% which qualifies for the distribution of CDBG funds to be citywide. The City of Radford allocates funding based on eligible organizations who carry out programs and projects within the City.

Geographic Distribution

Target Area	Percentage of Funds
Citywide	100

Table 8 - Geographic Distribution

Rationale for the priorities for allocating investments geographically

The City has over 64% of its residents earning less than 80% Area Median Income and whom live throughout the City.

Discussion

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

Introduction

The City of Radford understands the need for removing or ameliorating the negative effects of public policies that serve as barriers to affordable housing. City Staff continues to conduct a review of all relevant land use controls, zoning ordinances, building codes, and related fees and charges to identify and address any that may be considered barriers to affordable housing.

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

The City Comprehensive Plan supports our efforts to remove barriers to affordable housing by including policies that provide housing opportunities to all residents, including adequate supply of affordable housing for all incomes.

City staff is actively participating on a Regional Housing Study, whose goal is to provide a detailed understanding of local and regional housing issues and provide strategies to address affordable housing.

Discussion

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

Introduction

There is a growing need for affordable housing within the region. The challenge is identifying developers to invest in new affordable housing, as well as preservation of the existing housing stock.

The City will continue to explore new and innovative ways to increase affordable housing and expand economic opportunities for low-moderate income families.

Actions planned to address obstacles to meeting underserved needs

The City will continue to work with area agencies in attempt to leverage resources that will effectively help meet the goals of the program.

Actions planned to foster and maintain affordable housing

The City will utilize a portion of the CDBG funds this program year toward the emergency home repair/weatherization program to help maintain the housing stock.

Actions planned to reduce lead-based paint hazards

The City does not have the resources or expertise necessary to implement a lead poisoning prevention program. Instead, the City will work with the local health department to provide as effective a program as possible. To this end, the following steps will be taken over the next five years to improve local understanding and efforts to reduce lead-based paint hazards in the City:

1. Engage in analysis and study to determine and track lead hazards in the City.
2. Support efforts by the Health Department to reduce lead hazards in the community.

The Health Department reports a very low incidence of lead poisoning for the City and the entire New River Valley health district. Significant progress continues on a nationwide basis to reduce the incidence of lead paint poisoning.

Actions planned to reduce the number of poverty-level families

The City of Radford will continue to support effort to reduce the number of families and individuals living in poverty. The focus is primarily on supporting area agencies that directly assist with helping to reduce poverty-levels.

Actions planned to develop institutional structure

City staff is committed to continuing their education in administering the CDBG program by participating

in available trainings and webinars.

The City continually seeks opportunity to ensure growth and success in the community by working with agencies throughout Radford and the New River Valley. These collaborative efforts put an emphasis on the needs of the community without duplicating efforts by any one individual entity.

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

The City will continue its active role in the regional Continuum of Care as a member of the Board and other local agencies that provide resources to low to moderate income persons.

Discussion

The City will continue to look at additional ways to expand existing and find new opportunities that addresses the needs of our low to moderate income residents.

Program Specific Requirements

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

Introduction

The City of Radford does not participate in activities that provide Program Income.

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

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

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

Other CDBG Requirements

1. The amount of urgent need activities	0
2. The estimated percentage of CDBG funds that will be used for activities that benefit persons of low and moderate income. Overall Benefit - A consecutive period of one, two or three years may be used to determine that a minimum overall benefit of 70% of CDBG funds is used to benefit persons of low and moderate income. Specify the years covered that include this Annual Action Plan.	0.00%

Discussion

