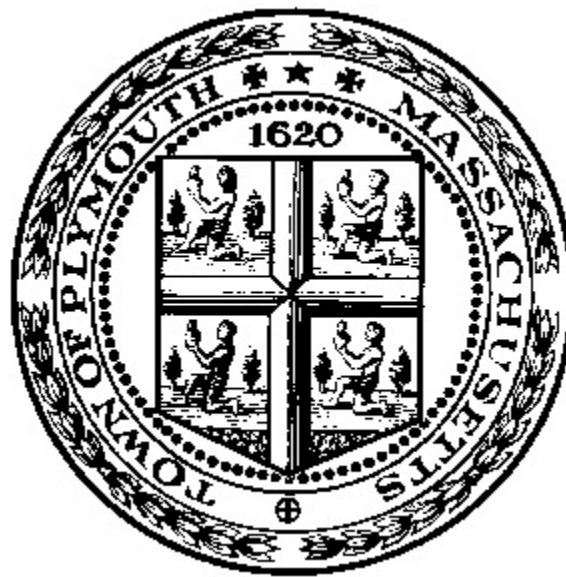


TOWN OF PLYMOUTH
COMMUNITY DEVELOPMENT BLOCK GRANT PROGRAM
ANNUAL ACTION PLAN (JULY 1, 2023-JUNE 30, 2024)



CONTACT PERSON:
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Executive Summary

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

1. Introduction

The Town of Plymouth is pleased to present its Action Plan for the Program Year **2023-2024** in conformance with the **2021-2026 Consolidated Plan**. With its annual entitlement of **\$387,007**, as well as program income, the Town strives to continue to promote its **Housing Rehabilitation Program** and **Microenterprise Assistance Program** both of which are needed and successfully impact the lives of low to moderate-income individuals. Also, the Town would like to continue to use Community Development Block Grant (CDBG) funds to provide financial assistance for **Affordability and Accessibility** (loans and grants) to projects that provide a direct benefit for low to moderate-income individuals in Plymouth. These additional programs include the **First Time Homebuyer Down Payment Assistance** and, two newer programs were recently added which include the **Housing Acquisition Program along with Public Services program**. The Plymouth Office of Community Development (OCD) administers the CDBG funds.

Programs and activities described in this plan are to primarily benefit low to moderate-income residents of the Town of Plymouth by providing decent affordable housing, economic opportunities, and a suitable living environment. The Department of Housing & Urban Development (HUD) defines low to moderate-income as those making 80% or less of the Area Median Income for Plymouth County. The numbers below reflect the grant funds awarded, the estimated carryover and projected program income for **2023-2024** Program Year.

➤ Entitlement Amount	\$387,007
➤ Estimated Carryover	\$533,109
➤ Projected Program income	<u>\$250,000</u>
Total	\$1,170,116

2. Summarize the Objectives and Outcomes Identified in the Plan

Affordable Housing Objectives: (Housing Rehab, Acquisition and Homebuyer Assistance)

- Acquisition of property for the purpose of creating affordable housing units.
- Rehabilitation of properties in need of repair, remove lead hazards, Septic repair, and code violations.
- Any other eligible activity that creates or preserves affordable Housing.

Outcome Statement: An estimated **20** low to moderate housing units will be rehabilitated for the purpose of providing decent, affordable housing. Also, the OCD will continue to work with the Plymouth Affordable Housing Trust (PAHT) with the goal of additional affordable housing in the community. It is expected that One Single Family unit will be rehabilitated through the PAHT during the **2023-2024** Program Year.

Economic Development: (Microenterprise Loans/Grants)

- Preserve and create new jobs for low to moderate-income persons
- Promote and strengthen the local economic recovery

Outcome Statement: An estimated three (**3**) small businesses will be able to maintain and expand their services, retain their existing employees, and create additional job openings. A total of six (**6**) existing jobs, full and part-time, will be retained, and eight (**8**) new jobs, full and part-time, will be created through the Microenterprise Assistance Program.

Other Community Development Objectives (Public Improvements and service activities)

- Help reduce the effects of poverty and improve the quality of life for low to moderate-income persons through support for vital social service providers and facilities
- Enhance the quality of life through the provision of better public facilities, infrastructure improvements and other neighborhood stabilization efforts
- Including ADA improvements to public buildings and ADA accessible walking trail.
- Increase awareness and availability of indoor gardening to allow low to moderate-income persons access to fresh fruits and vegetables

3. Evaluation of past performance

Current Programs: During the **2022-2023** program year, the Plymouth Office of Community Development offered the following programs: 1.) Housing Rehab Program: 2.) Microenterprise Assistance Program: 3.) Down Payment/Closing costs Assistance 4) Acquisition 5) Funding through the CARES act for COVID-19 Relief.

Housing Rehab Program: This program is available to all Town of Plymouth residents for code violations or public safety hazards. The program provides financial assistance to homeowners for windows, heating systems, septic systems, lead removal, roofing, and other critical housing components. The program is available to all residents who meet the program income guidelines (80% of the AMI). All payments are made directly to the contractors for the repairs. The financial assistance is provided in the form of loans and grants (grants only available to residents that are under 50% of the AMI). Loans are a 2% simple interest, deferred until sale or transfer of title (refinance). Grants, which require no repayment and are generally used for emergency projects (such as water heaters, etc.), are typically under **\$10,000**.

During the **2022-2023** Program Year, the Office of Community Development (OCD) had **21** applications, completed **11** (Eleven) Rehab Projects, **7** in process that will be completed in Program Year **2022-2023**, and **3** denied or withdrawn. There was a slight increase in the number of projects completed in 2022-2023 Program Year compared to 2021-2022, but the OCD did see project costs nearly double due to the economy and the cost of materials. The OCD does anticipate an increase of projects this coming Program Year.

Microenterprise Assistance Loan Program: This program is available to small business owners with 15 or fewer employees. The owner, or the employees benefited, must be low to moderate-income individuals. The key component of low to moderate benefit is through the creation of jobs for low to moderate income individuals. Program funds may be used to purchase equipment, inventory, working capital, etc. The financial assistance provided is a **5 to a 7-year** loan with a **2.63%** interest rate. The program can provide loans up to **\$50,000**. During the Program Year **2022-2023**, the Office of Community Development made **1** loan for **\$50,000**. The OCD anticipates assisting **2** businesses in the coming Program Year.

Down Payment & Closing Costs Assistance (DPA): The Down Payment Program allows for closing costs assistance and down payment to eligible First Time Homebuyers under 80% of the AMI to receive assistance in the form of a deferred loan that has zero percent interest and is paid back when sold or refinance. The OCD closed on **2** Down Payment Assistance loan during **2022-2023** totaling **\$12,500**. The OCD anticipate 2 this coming program year. There has been a reduction in the CDBG funded program since the PAHT created a Down Payment program for deed restricted properties, there was **1** homebuyer funded by the Plymouth Affordable Housing Trust totaling **\$12,000**. The OCD will continue to offer the CDBG funded Down Payment Assistance for First Time Homebuyers looking to purchase non deed restricted properties in the Town of Plymouth.

Acquisition Program: The OCD partnered with Habitat for Humanity on a joint acquisition Subrecipient agreement to purchase and rehab a property in the Town of Plymouth. The funding was provided by the CDBG grant under acquisition and the marketing and outreach is being completed by Habitat in cooperation with DHCD guidelines. The purchase has been completed and the rehab portion is being completed by Habitat and will bring us into the next fiscal year.

The OCD is hoping to do at least one more with Habitat this coming Program Year should an appropriate location be located. .

Cares Act: The Town of Plymouth was allocated a total of **\$796,549**. In CARES act funding which the OCD focused mainly on grants to small businesses affected by COVID. During Program Year **2021-2022** the OCD funded **59** small businesses with varying amounts using the same formula for all businesses paying up to 4 months' rent/utilities, and some inventory office avoided covering payroll due to the Payroll Protection Program and increased unemployment benefits so as not to duplicate benefits with the maximum grant amount being 20K. The Cares Act also funded an education/job placement program and a homeless COVID quarantine program. There is a balance of approx. **\$44,102**. which OCD plans to use during the coming Program Year.

4. Summary of Citizen Participation Process and consultation process

Summary from citizen participation section of plan.

Procedures:

- Public Hearing/Meetings: The Town of Plymouth will hold a public hearing either in person or virtual to obtain the views of citizens, public agencies, and other interested parties on the 5 year Consolidated Plan, Annual Action Plan and CAPER and any amendments.
- Public meeting notices are posted with the Town Clerk's office and comply with Massachusetts public meeting law requirements.
- Comments shall be submitted in writing or email pwhalen@plymouth-ma.gov to the Town of Plymouth, Office of Community Development, 26 Court Street, Plymouth, MA 02360.
- Comments will be considered and summarized for the final submission to HUD.

PUBLIC HEARING PLYMOUTH, MA – The Town of Plymouth, Office of Community Development, will conduct a public hearing on **Friday, April 14th, 2023 at 9:00 AM** via Zoom:

Join Zoom Meeting

<https://zoom.us/j/99097852571?pwd=WDhPcUJKS2VRUS4WFYrRVh0OWNkZz09>

Meeting ID: 990 9785 2571

Passcode: 313214

Annual Action Plan
2023-2024

This information has also been posted on our website and at the Clerk's Office. All provisions of the Citizen Participation Plan were fulfilled in accordance with the Plan. Please see AP-12 for a full description of the Citizen Participation process.

Encouragement of citizen participation:

Annual Public Hearings: The Office of Community Development will hold two **(2)** Public Hearings each Program Year to obtain views and to respond to proposals and questions, develop proposed activities, strategies and to discuss prior year performance. The first Public Hearing will be held during the first quarter of the year and the second Public Hearing will be held in the fourth quarter of the year.

Press Releases: The Town will issue press releases to notify the public of Public Meetings, Document Availability, Public Comment Periods, Substantial Amendments and Notices of Fund Availability. Press releases are distributed to local community agencies and press including but not limited to the following:

Direct Email: The Town maintains an email distribution list of agencies serving low- and moderate-income persons, residents requesting CDBG information, and other interested parties. The list is used to distribute notification of CDBG activity including but not limited to the following: Meeting Notices, Fund Availability Notices, Document Availability Notices, and Public Comment Periods.

Anyone wishing to receive email notifications can email: pwhalen@plymouth-ma.gov with "Add to CDBG List" in the subject field or by calling 508-332-3321. Participants shall provide the email address they wish to receive such notices at and their name(s). If affiliated with an agency please provide the agency name, title, and phone number.

5. Summary of public comments

PUBLIC HEARING PLYMOUTH, MA – The Town of Plymouth, Office of Community Development, will conduct a public hearing on **Friday, April 14th, 2023 at 9:00 AM** via Zoom:
Join Zoom Meeting

<https://zoom.us/j/99097852571?pwd=WDhPcUJKS2VRUS4WFYrRVh0OWNkZz09>

Meeting ID: 990 9785 2571

Passcode: 313214

Comments from Public Hearing –

6. There was one agency on the zoom public hearing meeting, and it was Rita Hurley from Father Bill's & MainSpring (info below). They are looking to get help with their winter homeless shelter. They can supply reimbursable invoices for housing the homeless in the coldest of the months and feeding them breakfast along with other supplies. I would like to work this into the Public Services part of the grant with a subrecipient agreement and possibly continue this support into the next program year of 2024-2025.



Rita Hurley (She, Her, Hers)

Grants and Compliance Associate

460 Belmont Street | Brockton, MA 02301

Tel: 1-774-297-7514 | Fax: 508-427-6514

rhurley@helpfbms.org | www.helpfbms.org

7. Summary

The Town of Plymouth's Action Plan for **2023-2024** seeks to utilize its CDBG entitlement in a manner that will best accomplish the key objectives of the **July 2021 – June 2026 Consolidated Plan**. This document is the **Third** year of the consolidated plan.

Community Development Housing Rehab Program: Continue our effort to rehabilitate and upgrade older and deteriorating housing units occupied by low to moderate income individuals. The Town of Plymouth anticipates rehabilitating twenty **(20) housing units** occupied by low to moderate income persons.

Microenterprise Loan Program: To be funded with funds from program income received from the repayment of prior loans. The Town anticipates assisting small businesses resulting in the creation of new jobs and retaining existing jobs through the implementation of this program.

Down Payment & Closing Cost Assistance: for First Time homebuyers. The Town would like to continue to utilize the down payment and closing costs to first time homebuyers buying in Plymouth. This would be a 0% deferred loan program that would help with the cost of down payment and closing costs. The buyer would need to have 3% of their own money and we would offer up to \$15,000 to go towards the cost. The Town would also offer rental assistance in the form of a grant for those looking to rent deed restricted affordable housing units and are short funds for rental down payment, eligibility would need to be under 80% AMI.

Acquisition: look to Partner with Habitat and the PAHT to help coordinate projects for Affordable Housing by either supplying the funds for materials until sale at 0% interest and/or supplying town land to the Habitat or PAHT to construct Affordable Housing that would add to our Housing Inventory.

Partner with Father Bills & MainSpring: to help prevent homelessness in Plymouth by providing funds through the CDBG grant to help support this critical work. The use of the funds would need to fall into the national objective of limited clientele (homeless).

Project-based Grants and Loans: to programs and services that would have a direct impact on neighborhoods in the community housed by low to moderate income individuals. These projects may include, but are not limited to, social service programs, capital improvement of neighborhood shared resources such as playgrounds/fields/trails, etc.

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

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

Agency Role	Name	Department/Agency
CDBG Administrator	PLYMOUTH	Planning and Community Development

Table 1 – Responsible Agencies

Narrative (optional)

The Town of Plymouth is an Entitlement Community and is responsible for preparing the Consolidated Plan, Annual Action Plan, Substantial Amendments and preparing and submitting the Consolidated Annual Performance Evaluation Reports (CAPER) directly to HUD.

Consolidated Plan Public Contact Information

Town of Plymouth
 Office of Community Development
 26 Court Street Plymouth, MA
 Peggy Whalen, Director
pwhalen@plymouth-ma.gov
 1-508-322-3321

AP-10 Consultation – 91.100, 91.200(b), 91.215(I)

1. Introduction

The Goal of the consultation process in the preparation of the Consolidated Plan is to strengthen the partnerships among all levels of government, the private sector, and other concerned stakeholders. To Achieve these goals the Town of Plymouth implemented the following activities.

The Town of Plymouth planned to consult with several different organizations in the preparation of the Consolidated Plan, however with the pandemic The Town was unable to consult with as many agencies as planned. The Town will be reaching out to those agencies this coming Program Year and will be including those that provide assisted housing, health services, social and fair housing services (including those focusing on services to children, elderly, persons with disabilities, with HIV/AIDS and their families, and Veterans)

The Consultation process for the Annual Action Plan included inviting public housing and service agencies to attend the meeting via Zoom on **Friday April 14th at 9:00am** Those that cannot make it, are encouraged to submit comments. The agencies are also provided notice when the draft is available and encouraged to comment during the public comment period.

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))

In addition to public meetings the Town consults directly with public housing providers and service agencies. These agencies are given the opportunity to comment on the Towns Community Development housing efforts. They will also be notified of availability of funding.

During the development of the Plymouth One Year Action Plan for Program Year **2023-2024**, the Town of Plymouth consulted with local human services providers (public and private) to obtain their opinion on the housing and the needs of Plymouth households. This was done through the use of public hearings, direct conversations with community partners, and email inquiries. Agencies and organizations consulted included those who serve the homeless, disabled, elderly, people living with HIV/AIDS, low-income residents, and people struggling with mental health issues or substance abuse, as well as agencies which promote economic opportunities and sustainability. These agencies were both local and regional entities.

Outreach includes meetings, phone calls, and email correspondence. Discussion on housing and community development needs and programs and projects to address those needs.

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 CDBG Program coordinates emergency housing services and housing development by meeting or contacting regularly with public and assisted housing providers and health service agencies such as Father Bills, the Plymouth Affordable Housing Trust, Plymouth Housing Authority, Habitat for Humanity, South Shore Community Action Council, the Plymouth Community Housing Inc, (a Nonprofit housing agency), and the Plymouth Redevelopment Authority. These agencies were given the opportunity to comment on the Town's community development and housing efforts. They will also be notified of availability of funding.

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

Town staff often provides contact information to local resources to homeless persons and persons at risk of homelessness. Working closely with agencies that provide emergency housing and support and also notifying them of availability of funding.

2. Describe Agencies, groups, organizations, and others who participated in the process and describe the jurisdiction's consultations with housing, social service agencies and other entities

Table 2 – Agencies, groups, organizations who participated.

1	Agency/Group/Organization	PLYMOUTH HOUSING AUTHORITY
	Agency/Group/Organization Type	Housing Services - Housing
	What section of the Plan was addressed by Consultation?	Public Housing Needs Homeless Needs - Chronically homeless
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Provided notices of public meeting, available drafts, comment periods and available funds. Direct consultations by meeting, phone and email.
2	Agency/Group/Organization	FATHER BILLS & MAINSPRING
	Agency/Group/Organization Type	Services-homeless
	What section of the Plan was addressed by Consultation?	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?	Provided notices of public meeting, available drafts, comment periods and available funds. Direct consultations by meeting, phone and email.
3	Agency/Group/Organization	PLYMOUTH REDEVELOPMENT AUTHORITY
	Agency/Group/Organization Type	Housing Services - Housing Service-Fair Housing Other government - Local

	What section of the Plan was addressed by Consultation?	Public Housing Needs Economic Development
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	The Community Development Director works closely with the PRA to address homebuyer education and available housing for potential buyers and ways we can join together to increase housing for low to moderate income individuals/families
4	Agency/Group/Organization	HABITAT FOR HUMANITY
	Agency/Group/Organization Type	Housing
	What section of the Plan was addressed by Consultation?	Housing need assessment 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?	Provided notices of public meeting, available drafts, comment periods and available funds. Direct consultations by meeting, phone and email

5	Agency/Group/Organization	DEPARTMENT OF TRANSITIONAL ASSISTANCE
	Agency/Group/Organization Type	Other government-State
	What section of the Plan was addressed by Consultation?	Public Housing Needs Homeless Needs - Chronically homeless, families with children, veterans
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Provided notices of public meeting, available drafts, comment periods and available funds. Direct consultations by meeting, phone and email.

6	Agency/Group/Organization	SOUTH SHORE COMMUNITY ACTION COUNCIL
	Agency/Group/Organization Type	Regional Organization Private Non-Profit
	What section of the Plan was addressed by Consultation?	Housing Needs Assessment Community Development
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Provided notices of public meeting, available drafts, comment periods and available funds. Direct consultations by meeting, phone and email.
7	Agency/Group/Organization	SALVATION ARMY CORPS
	Agency/Group/Organization Type	Regional Organization Services
	What section of the Plan was addressed by Consultation?	Housing Needs Assessment Community Development
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Provided notices of public meeting, available drafts, comment periods and available funds. Direct consultations by meeting, phone and email.

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

The new Director is working on increasing communication and interaction between the local and state human service agencies in the upcoming program year.

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	Brockton/Plymouth City & County CoC	Discussions will be set up to determine how each of our services overlap and how we can coordinate our programs to address such issues as affordable housing, economic development, and community development.

Table 3 – Other local / regional / federal planning efforts

Narrative (optional)

AP-12 Participation – 91.105, 91.200(c)

1. Summary of citizen participation process/Efforts made to broaden citizen participation

Summarize citizen participation process and how it impacted goal-setting

The Office of Community Development held a public hearing on **April 14th 2023 at 9:00am Via Zoom**. A legal notice was placed in the Old Colony Memorial newspaper. A stakeholder database was created, and emails of the notice were sent to all stakeholders identified in the amended Citizen Participation Plan.

Any email that was undeliverable by email was mailed a hard copy.

The Town also posted the legal notice on the Town website. Notice of the public hearing was filed with the Office of the Town Clerk.

Also, the Town of Plymouth also published a legal notice entitled, “LEGAL NOTICE, Town of Plymouth, Notice of Availability and Public Comment Period **April 14th 2023 through May 15th 2023** this legal notice was published in the Old Colony Memorial before the beginning of the public comment period. The Town also posted the legal notice on the Town website. Notice of the public hearing was also filed with the Office of the Town Clerk.

The Town of Plymouth has successfully managed its Housing Rehabilitation Program and Microenterprise Program, and as a result, this continues to be the primary source of program income. The OCD is looking at ways to use funds outside of the Housing Rehabilitation Program and Microenterprise Program and seek out projects, services or capital programs that will directly impact low to moderate clientele in the Town of Plymouth.

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	Public Hearing	Non-Targeted broad community				
2	Newspaper Ad Press Release	Minorities Persons with disabilities Non-targeted/broad community Residents of Public and Assisted Housing				

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
3	Internet Outreach	Minorities Persons with disabilities Non-targeted/broad community Residents of Public and Assisted Housing				

**Table 4 – Citizen Participation Outreach
Expected Resources**

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

Introduction

The amount of the actual award is **\$387,007.00** The carryover is an estimate until all activity through **June 30, 2023**, is processed. Income from property transfers and repayments are estimates using past performance.

The Town of Plymouth will direct all its entitlement funding under the **FY-2023-2024** Action Plan, plus program income, as well as any carryover to the following activities: Housing Rehabilitation, Microenterprise Assistance, Down Payment & Closing Costs Assistance and also Acquisition.

Priority Table

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Reminder 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	387,007	250,000	533,109	1,170,116	3,000,000.	

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.

Certain other non-CDBG resources serve to support the objectives and goals identified in the Consolidated Plan and the activities carried out through the Action Plan. The Town of Plymouth, working through the Office of Community Development, will seek to coordinate and leverage these externally funded efforts with CDBG funds. Some of these activities include: The Plymouth Redevelopment Authority's First Time Homebuyers Program; using the Plymouth Affordable Housing Trust to provide loans for 1st Time Homebuyers and for housing rehab loans to developers to renovate homes into affordable housing units and the Title V Program which uses state funds to provide low-interest loans to homeowners to replace failing septic systems.

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

The Plymouth Affordable Housing Trust is currently exploring acquiring tax title properties to rehab and include in the towns Subsidized housing inventory.

Discussion

To the extent feasible, the Town will utilize limited amounts of its annual allocation to support individual smaller non-housing community development-based initiatives, beyond its primary program objectives of housing rehabilitation and microenterprise assistance and add a program of down payment and closing cost assistance for first time homebuyers. Town departments and agencies will continue to pursue other federal, state, and local resources when available, which will assist in the programming of projects addressing non-housing community development needs as discussed in the **2021-2025 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	Housing Rehab Program	2021	2026	Affordable Housing		Owner Housing Objectives- Retention, Rehab	CDBG: \$543,116	Homeowner Rehabilitated: 20 Household Housing Unit
2	Economic Development	2021	2026	Non-Housing Community Development		Economic Development Public Facilities Public Services	CDBG: \$100,000	Jobs created/retained: includes 100k in CARES act and includes Façade improvement loans
3	Affordability	2021	2026	Affordable Housing		Owner Housing Objectives-Asst for Homeownership	CDBG: \$300,000	Direct Financial Assistance to Homebuyers 2 Households Assisted & Acquisition
4	Accessibility	2021	2026	Public Services		Public Facilities Public Services	CDBG: \$100,000	Infrastructure and graffiti removal program

Table 6 – Goals Summary/Does not include 127K for Administration.

*Current Grant Year =387,007+ estimated program income x20% is the max for ADMIN

Goal Descriptions

1	Goal Name	Housing Rehab Program
	Goal Description	May include Acquisition of property for purpose of creating or preserving affordable housing units; Rehab activities to preserve housing stock including but not limited to septic and lead removal. This also includes acquisition and/or site clearance and utility work. The amount is estimated using previous years estimated allocation and carryover and will increase proportionately to the grant funding
2	Goal Name	Economic Development
	Goal Description	Continuation of the Micro-Enterprise loan program; creating jobs for low and moderate-income persons and assist with Facade improvement loans
3	Goal Name	Affordability
	Goal Description	The purpose of this goal is to assist low to moderate first-time homebuyers with down payment assistance/closing costs and also for Acquisition
4	Goal Name	Accessibility
	Goal Description	Public Facilities, infrastructure, and other public improvements Including ADA improvements to public buildings and open space walking Trail. Graffiti removal program and a new indoor garden for the purpose of donation of fresh vegetables to the food pantry/food kitchen to feed the low income and homeless.

Table 7 Admin. & Planning 127K

AP-35 Projects – 91.220(d)

Introduction

According to the 2010-2014 ACS, 16% of the Town's housing stock was built before 1940, and 12.8% was built between 1940 and 1959. Approximately, 29% of the housing supply was constructed before 1959, much of this housing stock was built before the adoption of our Town Zoning Bylaws. Consequently, in many cases, these older properties were never in compliance with our current building, zoning, and occupancy standards. Town has decided to prioritize housing rehabilitation as a critical community need and utilize its CDBG entitlement funds towards this end. Since 1987, Plymouth, through its Housing Rehabilitation Program has brought up to code, otherwise improved, **692** units of housing.

Small businesses continue to struggle despite our current economy. The effort to start up a new business, or expand an existing small business, is a constant challenge to the small business owner. Like most communities, Plymouth is made up of small businesses that power our local economy. Small businesses rely on local residents for their employment needs. **48%** of Plymouth's town-wide population is made up of low to moderate income households. Many of these households have individuals who are employed in local small businesses. Often small businesses are unable to obtain capital to start up or expand because of underwriting standards that are used by larger commercial banks. These standards require small businesses to have a business history, sufficient capital to collateralize the loan or to have an established credit rating. As a result, numerous small businesses struggle to find lenders willing to lend funds to them. The Microenterprise Assistance Program fills an important need in the business community by providing capital to small business. These funds provide a means to start a business, expand the sales of an existing business, and to remain to keep the doors open in a challenging economy. A second significant benefit is the jobs that are created through the Microenterprise Assistance Program. New jobs are created which directly benefit low to moderate income individuals and existing jobs are retained using these funds.

1	Housing Rehab & Acquisition
2	Microenterprise
3	Affordability
4	Accessibility
5	Admin & Planning

–Project Information

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

Allocation priorities are based on the Consolidated Plan goals, consultations, public input, and fund requests while preparing this plan. Obstacles include lack of funding to address all the needs that can be funded with the CDBG grant.

Projects

AP-35 Projects Summary

Project Summary Information

Table 7 – Project Summary

1	Project Name	HOUSING REHABILITATION
	Target Area	Town-wide
	Goals Supported	Housing Rehab Program
	Needs Addressed	Owner Housing Objectives – Assistance for Homeowners
	Funding	CDBG: \$543,116
	Description	The Housing Rehabilitation Program will target owner-occupied single family and two-family dwelling units. Single-family dwelling units must be occupied by a low, or low to moderate income household. At least one of the units in a two-unit structure must be occupied by a low, low to moderate income household. The rehab program will also address vacant abandoned structures owned by the Plymouth Affordable Housing Trust which will be rehabilitated and made available for resale to a low to moderate income buyer. These properties will be deed restricted and affordable in perpetuity.
	Target Date	6/30/2024
	Estimate the number and type of families that will benefit from the proposed activities	Twenty families (20) will benefit from the housing rehabilitation program. In addition, one (1 or 2) families will benefit from the creation of a rehabilitated single-family home in partnership with the Plymouth Affordable Housing Trust.
	Location Description	The Housing Rehabilitation Program is offered on a community-wide basis.

	Planned Activities	The planned activities are the rehabilitation of twenty (20) housing units and the rehabilitation of one (1 or 2) single-family house. The rehabilitation of these units will be to address code and public safety concerns within the individual unit. This program is available to low income and low to moderate income, individuals and the distribution of the funds is by low-interest loans and outright grants (very low income).
2	Project Name	MICROENTERPRISE E LOAN PROGRAM
	Target Area	Town-wide
	Goals Supported	Economic Development
	Needs Addressed	Economic Development
	Funding	CDBG: \$100,000.
	Description	The Microenterprise Assistance Program will target and assist low to moderate income individuals seeking to create a small business or owners of existing businesses seeking to strengthen and expand their business and create new jobs for low to moderate income individuals. The program provides business training (SCORE), low interest loans, and free technical assistance. These businesses must be located in Plymouth, owned by low to moderate income individuals, or will create jobs of which 51% will be made available to low and moderate-income individuals. Also, loans to businesses for facade improvement.
	Target Date	6/30/2024
	Estimate the number and type of families that will benefit from the proposed activities	A total of fourteen (14) individuals 6 jobs retained and 8 new jobs will benefit, and 3 or more businesses assisted
	Location Description	This program is offered town-wide to new business owners or existing business owners who qualify for the program.

	Planned Activities	This program will provide loans up to \$50,000 (@2.63 interest) to small business owners for job creation. The loan must be offered to a low-income business owner or create, and/or maintain existing jobs which will benefit low to moderate income individuals. The business owner will file an application and meet the criteria of the program. Each application will be approved based on sound financial underwriting. The same guidelines for the façade program as well.
3	Project Name	Affordability
	Target Area	Town Wide
	Goals Supported	Affordable Housing
	Needs Addressed	Affordability
	Funding	CDBG: \$300,000.
	Description	The Down Payment & Closing costs Assistance Program will benefit low to moderate income persons with assistance in purchasing a home. Part of the obstacle of homeownership is being able to secure the down payment when you are under the 80% AMI its more of a challenge. This program will fill that gap, homebuyer needs to provide some of the funding 1.5% of their own money but we will provide an additional 1.5% and cover most closing costs, with a max of \$15,000. May include grant funding for Rental assistance & Also include Acquisition for Affordable Housing Lottery
	Target Date	6/30/2024
	Estimate the number and type of families that will benefit from the proposed activities	The OCD estimates to help 2 families with Down Payment Assistance and 1-2 families with the Affordable lottery on acquired/rehab of a distressed property. The reduction in DPA families is due to the AHT also having a DPA program for deed restricted properties.
	Location Description	The administration of the CDBG program is town wide.
	Planned Activities	To administer the Community Development Block Grant program for Program Year 2023.
4	Project Name	Accessibility
	Target Area	Town-wide

	Goals Supported	Accessibility
	Needs Addressed	Public Facilities Public Services
	Funding	CDBG: \$100,000
	Description	Public Facilities, infrastructure and other public improvements that benefit low- to moderate-income persons and special needs populations. Projects that improve access. Priority is for ADA compliance in public spaces. Also, donation of fresh food to the homeless and food pantry. Rides to Dr. & jobs and Homeless winter shelter
	Target Date	6/30/2024
	Estimate the number and type of families that will benefit from the proposed activities	Infrastructure and public services
	Location Description	Town Wide
	Planned Activities	The OCD is not sure what activities as of yet will be identified but will be targeting access to public buildings and open space.
5	Project Name	Administration & Planning
	Target Area	
	Goals Supported	
	Needs Addressed	
	Funding	CDBG: \$127,000
	Description	This project is the administrative cost, salaries and general expense associated with administering the Community Block Grant Program in the Town of Plymouth. The Programs personnel includes an Office of Community Development Director, A housing Rehabilitation Specialist and a Fiscal Coordinator/Program Coordinator. General expenses are all ordinary expenses associated with the operation of a Community Development Office.
	Target Date	6/30/2024

	Estimate the number and type of families that will benefit from the proposed activities	This would be a town wide benefit
	Location Description	The administration is town wide
	Planned Activities	To Administer the Community Block Grant program for Program Year 2023-2024

AP-50 Geographic Distribution – 91.220(f)

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

The Housing Rehabilitation Program is a town-wide program and not targeted towards any specific area in Town. A significant number of homes are located in West Plymouth, Manomet and South Plymouth. In the upcoming year, OCD will extend our outreach program to target households in the North Plymouth and Downtown area. Outreach for the Housing Rehabilitation Program is achieved by a flyer that is inserted in the tax bill twice a year and a program description on the Office of Community Development website. The Office of Community Development will actively market this program by releasing press releases, cable and web notices regarding the availability of the program.

The Microenterprise Program is offered on a community-wide basis due to the direct program benefit for low to moderate income individuals. Job creation can occur in any area in the community that is properly zoned for the creation of business.

Affordability is planned as a town-wide program not targeted towards any specific area in Town.

Accessibility is also town wide project but specifically targeting public buildings and some open space for the improvement of ADA accessibility.

Geographic Distribution

Target Area	Percentage of Funds
Town-wide	100%

Table 8 - Geographic Distribution

Rationale for the priorities for allocating investments geographically.

There is statistical and visual evidence of poor housing quality in various locations in the community. The building value of about 1,600 single family homes falls below the 10th percentile for the Town as a whole. According to the Plymouth Assessors Office, 10% of all two-family homes, and 17% of all three family homes are rated fair to poor. These properties are predominantly located in Plymouth Center and North Plymouth.

The Microenterprise Assistance Program is a town-wide program. The criteria for

specifying that the either the owner of the small business is a low to moderate individual or that the business will create, or retain, several low to moderate income jobs. As a result, this type of program activity can happen in a business located in any area of town.

Discussion

While the Town of Plymouth does have some retrograding housing stock, the Town does not have a pervasive housing quality problem. While some substandard conditions do exist in several parts of Town, there is no significant area where housing stock is obvious or where there is disinvestment is apparent.

The importance of job creation and retention is critical to the development of the vibrant local economy. The benefit to low and moderate-income individuals in job creation and retention is an important part of the success of this program.

Affordable Housing

AP-55 Affordable Housing – 91.220(g)

Introduction

The Town of Plymouth, acting through the Office of Community Development, plans to rehabilitate twenty **(20)** properties in **Program Year 2023**. These properties will be owned by low to moderate income individuals and families.

The Plymouth Affordable Housing Trust (PAHT) is an active proponent in the community for affordable housing. The PAHT has, in the past, sponsored two (2) programs which assist low to moderate income households achieve the goal of obtaining affordable housing.

The OCD, in partnership with the AHT, is planning to rehabilitate one (1) single-family home in Program Year **2023-2024** as an affordable unit to add to the Subsidized Housing Inventory

Finally, the Town's Affordable Housing Plan contains a number of strategies for increasing the Town's inventory of affordable housing. These plans include working with non-profit developers, targeting infrastructure improvements to increase affordable housing development, and usage of the Plymouth Affordable Housing Trust and Community Preservation Funds for the development of affordable housing.

One Year Goals for the Number of Households to be Supported	
Homeless	0
Non-Homeless	20
Special-Needs	0
Total	20

Table 9 - One Year Goals for Affordable Housing by Support Requirement

One Year Goals for the Number of Households Supported Through	
Rental Assistance	0
The Production of New Units	0
Rehab of Existing Units	20
Acquisition of Existing Units	0
Total	20

Table 10 - One Year Goals for Affordable Housing by Support Type

Discussion

The Office of Community Development, acting on behalf of the Town, looks to take an active role in addressing the needs of affordable housing through close interaction with the Plymouth Housing Authority, Plymouth Affordable Housing Trust, Community Preservation Committee, and the Plymouth County Housing Alliance in **Program Year 2023**.

AP-60 Public Housing – 91.220(h)**Introduction**

The Plymouth Housing Authority's mission is to provide safe, decent, and sanitary housing conditions for very low-income families and to manage resources efficiently. The PHA is to promote personal, economic and social upward mobility to provide families the opportunity to make the transition from subsidized to non-subsidized housing." (website)

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

The Town of Plymouth, through the Office of Community Development, will explore development opportunities with the PHA and other agencies, in the program year **2023-2024**. As a potential funding source for development, the OCD through the use of CDBG entitlement funds and program income is able to provide financing to the PHA and other agencies/non-profits for the development of affordable housing. The OCD, working in partnership with the Plymouth Housing Authority, Habitat, Plymouth Affordable Housing Trust, the Plymouth Redevelopment, HUD, and other non-profit agencies the Town is committed to the development of new affordable housing in the Town of Plymouth as part of its Local Initiative Program (LIP).

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

The PHA has implemented and runs a Family Self-Sufficiency Program (FSS) whose goal is to improve the lives of PHA residents through vocational counseling and training, childcare training, substance abuse counseling and training, training in homemaking and personal money management. The outcome of this program is to prepare the participants to be homeowners.

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

N/A

Discussion

We often refer families to the PHA for subsidized housing needs.

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

Introduction

In the past, the Town has not dedicated any of its CDBG entitlement allocation to address the emergency shelter and transitional needs of homeless individuals and families. The Town through the office of Community Development would like to be more involved in this group and are meeting with the members of the taskforce to address any needs that we can help with.

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

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

Father Bills & Mainspring has reached out to the OCD to ask for support through the CDBG funds to help fund their program, the OCD needs to find the right project within the program that we are able to fund or partner with them on.

Also, the Town of Plymouth will continue to support the efforts of the Plymouth County Housing Alliance (PCHA), the Coalition for the Homeless, the Plymouth Task Force for the Homeless, Father Bill's/MainSpring and other groups/agencies as they address homelessness and intervention in emergency situations.

Addressing the emergency shelter and transitional housing needs of homeless persons

Father Bill's/MainSpring (FBMS) and the Plymouth Taskforce to End Homelessness are two of the lead agencies that provide emergency shelter and transitional housing needs services in the Town of Plymouth. FBMS has been serving our community housing resource services and overnight housing for the homeless. The program, Overnights of Hospitality, which is jointly run by FBMS and the Plymouth Taskforce to End Homelessness, is the sole provider of winter emergency shelter.

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

recently homeless from becoming homeless again

Father Bill's/MainSpring together with the Plymouth Taskforce to End Homelessness provide services which include street outreach, assessments, information and referrals, housing search and placement, and home-based stabilization services. FBMS currently supports 40 formerly homeless households in Plymouth. These 40 units are professionally maintained by FBMS and are funded through a variety of public funding sources. When vacancies occur, Father Bill's/MainSpring assists another homeless household which needs housing and housing services.

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

FBMS has proposed a program to serve the needs of individuals who need assistance and are on the verge of becoming homeless. The purpose of the program is to provide counseling and resource assistance and to help the individual(s) stay in their homes. Father Bill's has expressed an interest to apply for CDBG funds to partially support their proposed program.

Discussion

The Town of Plymouth continues to support Father Bill's/MainSpring and the Plymouth Taskforce to End Homelessness in their efforts to address the issues surrounding homelessness in our community.

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

Introduction

Several factors contribute to the ability to develop affordable housing in the Town of Plymouth. These factors include, but not limited to:

- 1) Land and housing are expensive and not affordable to many residents,
- 2.) The availability of developable land due to the build-out of commercial development and housing in the community.
- 3.) The availability of land for the development of two-family and multifamily housing is difficult due to zoning and other state/local regulations.
- 4.) The applicability of laws and regulations that may impact the development of available land.
- 5.) Title V.
- 6.) Lead Paint

The median home value in Plymouth has increased dramatically and is expected to continue to rise. As America's Hometown, Plymouth is one of the oldest communities in North America. As a result, Plymouth is a mature community regarding development having been in existence since 1620. Zoning and other developmental regulations have added to the difficulty in developing multi-family housing in the community.

Federal and state authorities administer environmental laws to protect wetlands and water resources; to clean up hazardous waste; reduce non-point source pollution; manage storm water run-off, and to remove lead paint from older homes. The Town of Plymouth is the largest municipality in Massachusetts area-wise. Also, being a coastal community, Plymouth has vast areas of wetlands, floodplain, and water resources such as ponds and lakes. These water resources, coupled with Plymouth's large land area, contribute to Plymouth being a Coastal Area of Environmental Concern (ACEC).

Title V regulations have limited the development of available land by requiring more land to develop affordable housing (particularly in areas with public water).

Finally, due to the age of the housing stock, lead paint can be an impediment to the development of houses into affordable housing. Lead paint was banned in the United

States in 1978. Lead paint removal is required by the Office of Community Development as part of any housing rehabilitation project funded with CDBG funds.

Actions that 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 Town established the Plymouth Affordable Housing Trust (PAHT) in 2006. PAHT has been charged with the responsibility of creating affordable rental properties and housing in the community. Towards this end, the Plymouth Affordable Housing Trust has established programs (noted earlier in the Action Plan) which benefit First Time Home Buyers

The Town of Plymouth, through legislative action by Town Meeting, has adopted to establish real estate fees through the Community Preservation Action. These funds are available for the creation of affordable housing and the preservation of open space.

Finally, the Town, through Town Meeting action, has adopted an Inclusionary Zoning Bylaw which provides either: 1.) for the creation of affordable units as part of any larger development project; or, 2.) the payment of an In Lieu Donation to the Town as part of any larger development project. The sole purpose of the Inclusionary Zoning Bylaw is to create affordable housing as part of any large development project or provide funds for the creation of affordable housing in the community as a whole.

Discussion

The Town of Plymouth is dependent upon the creation of affordable housing by private for-profit developers. The only local non-profit funding that is available for the creation of affordable housing is through the Plymouth Affordable Housing Trust or the Community Preservation Fund.

Without the help of non-profit developers, or a coordinated regional presence to create affordable housing by independent non-profit agencies, the Town will have to rely on the creation of affordable housing through the use of the Inclusionary Zoning Bylaw, Chapter 40B or Chapter 40R.

AP-85 Other Actions – 91.220(k)**Introduction**

The Town of Plymouth will work in close collaboration with its stakeholders in Program Year **2023-2024** to identify and meet unserved needs the community and help alleviate those underserved needs.

Actions planned to address obstacles to meeting underserved needs.

The Town will, in the upcoming year, work to increase the channels of communication with its partners: 1.) identify all unmet needs in the community; and 2.) by coordinating activities between the various agencies to address and implement policies/actions that help to alleviate these underserved needs. The Town will work closely with the Plymouth Housing Authority, Plymouth Planning Department, Plymouth Redevelopment Authority, Affordable Housing Trust and others to open a dialogue on how to best to serve those that are not being served through traditional channels of service.

Actions planned to foster and maintain affordable housing.

The Town will continue its program for housing rehabilitation and will work with the Plymouth Housing Authority to develop new affordable rental and single/multifamily housing. Additionally, the Office of Community Development will work to explore opportunities to partner with the Plymouth Redevelopment Authority and other groups such as Habitat for Humanity to develop affordable housing in Plymouth.

Actions planned to reduce lead-based paint hazards.

The Town will continue to require, as part of its grant/loan program for housing rehabilitation, that all awards be based on prioritizing lead paint removal as the priority for any grant award or loan. Lead testing is required to be done as part of any rehabilitation application before any housing rehabilitation/activity. The OCD is also planning on partnering with Mass Housing get the lead out program to help with those properties that may have been too large requiring too much funding on our part alone, they will help fund up to 30K for lead abatement.

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

The Town of Plymouth has a broad general goal of reducing the number of families living at the poverty level. The Family Self-Sufficiency Program which is administered by the Plymouth Housing Authority is an example of a program that has been

successful at reducing the number of families living at poverty level. The goal of this program is to improve the income, stability, and self-sufficiency of the families participating in the program. Also, the Town continues to advocate and support the efforts of the Head Start Program. This program which is operated by the South Shore Community Action Council is designed to help and assist children who come from low-income families to succeed in school.

Most importantly, the Town of Plymouth, through its use of Community Development Block Grant funds, will continue to promote its Microenterprise Assistance Program which will create new jobs and retain existing jobs. The Town feels that the best anti-poverty program is job creation and retention.

Actions planned to develop institutional structure.

The Office of Community Development (OCD) manages its Community Development Block Grant program with a staff of three: The Community Development Director, Program Coordinator/Fiscal Manager, and a Housing Rehabilitation Specialist. Except for the Housing Rehabilitation Specialist, the remaining staff is involved with the administration and implementation of the entire program. All division of responsibilities between members of our team ensures that not one person has sole oversight of any one transaction from start to finish. Although the Community Development Director provides managerial oversight for the program and controls and authorizes all activities, others are responsible for specific program activities within each program. The OCD staff works closely with private contractors, town departments, HUD, the Department of Housing and Community Development, and its stakeholders to foster a spirit of cooperation and community in the areas of affordable housing, economic development, homelessness, and other related issues.

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

The update of the stakeholder database will help the OCD to communicate with our stakeholders quickly and efficiently during the upcoming program year. In addition, the Office of Community Development intends to engage with its stakeholders more actively by participating in programs and activities sponsored by the private housing and social service agencies.

Discussion

The Town of Plymouth is cognizant of the importance of identifying all unmet needs and

determining the appropriate action necessary to address such needs. The Office of Community Development is committed to increasing participation by our stakeholders to define and address all unmet needs in our community.

Program Specific Requirements

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

Introduction

This section of the Action Plan addresses resources that may be expected to be available to support CDBG activities/programs. For example, the amount of any program income received prior to the start of the **2023-2024** Program Year has not been reprogrammed.

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

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

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

Other CDBG Requirements

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

Discussion

The overall resources expected to be available for use for activities/projects supported through the Community Development Block Grant program are fully described in Section AP-15 of this Action Plan. There are no urgent needs activities anticipated, but these needs would be prioritized, and the Action Plan amended should the need arise. The percentage of new CDBG funds that would be allocated to low to moderate-income individuals is 100%. The Town uses a three-year certification period to ensure that at least 70% of CDBG funds are available to low to moderate income persons.