

TOWN OF MANCHESTER



COMMUNITY DEVELOPMENT BLOCK GRANT ANNUAL ACTION PLAN

OCTOBER 1, 2021 – SEPTEMBER 30, 2022

Executive Summary

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

1. Introduction

As an entitlement community for the federal Community Development Block Grant (CDBG) program, the Town of Manchester is required to prepare an Annual Action Plan for the use of CDBG funds. To be eligible for CDBG funding, a project must meet one of three national objectives: (1) be of benefit to low and/or moderate-income households, (2) work towards the elimination of slum and blight or (3) meet a particular urgent community development need.

This Annual Action Plan outlines Manchester's proposed investment of CDBG grant funds in the areas of housing, public facilities, community development and public services. The town has \$573,392 in CDBG funds available for projects and activities in the forty-seventh (47th) program year, which runs October 1, 2021 - September 30, 2022. The Town's Planning Department is the agency responsible for administering the CDBG program.

This Action Plan represents Year 2 of the 2020-2024 Consolidated Plan and will discuss objectives, funding levels, and specific projects and activities planned for this program year. Projects and activities described in this report were approved for funding by the Board of Directors after providing numerous opportunities for public participation and input.

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 Town's primary goal for the use of CDBG funding is to preserve, improve and revitalize our older neighborhoods, where housing and other needs are greatest and broadest, so they will continue to be livable and attractive places.

The Department of Housing and Urban Development (HUD) requires a focus on three particular outcomes to guide CDBG expenditures: Affordability, Availability/Accessibility and Sustainability. In order to create vibrant, healthy neighborhoods, provide opportunities for our residents and to meet HUD's desired outcomes, we will pursue these objectives by funding the following projects during the 47th program year:

Affordability

- Maintain availability of affordable, safe and sanitary housing through: home repair, rehabilitation of owner- and renter-occupied units, accessibility improvements, addressing lead hazards and code enforcement. *Projects: Housing Rehab Program, Rebuilding Together Roofing Program, MACC Boiler Replacements.*

Availability/Accessibility

- Provide services to improve the health, well-being and economic position of low/moderate-income individuals and families. *Projects: BrightStart Family Workshops, Interval House East.*
- Maintain, improve or repurpose public facilities located in income-eligible areas and those that serve low/moderate-income residents. Accessibility improvements may also be included. *Projects: Work_Space Accessibility Project.*
- Complete public improvements including but not limited to park and trail improvements, sidewalk replacement or installation and general streetscape improvements in low/moderate-income neighborhoods. *Projects: Tolland Turnpike Sidewalks*

3. Evaluation of past performance

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

Housing programs funded by CDBG have had a significant impact on the condition of affordable housing units in Manchester. Rebuilding Together's roofing program has filled a service gap by providing replacements for roofs in poor condition and, when needed, related chimney work. The program has been very successful and continues to maintain a waiting list.

The Housing Rehab Program's general rehab portion continues to fill the need for addressing lead and code issues in lower-income Manchester properties, particularly in our older neighborhoods. Continued coordination with the Health Department ensures any cases of lead poisoned children are quickly referred to the Rehab Program or Connecticut Children's Healthy Homes Program (CCHHP) with whom we frequently partner on lead projects. The emergency replacement component has been vital to restoring heat and hot water to many homes with non-functioning systems. This program addresses issues that threaten the health and/or safety of a property's occupants and provides flexibility to address a variety of issues, such as failing septic systems and compromised sewer lines.

Past performance of sub-recipients is reviewed when considering whether to fund a program again. Some programs may experience adjustments to their funding based on number of people served or whether the program spent all funding received during past program years.

CDBG's impact on Manchester's low/moderate income households and neighborhoods has been significant. The town continues to use the needs and priorities identified in the Consolidated Plan as a guide when selecting programs to fund. Citizen participation and input is also always considered. There continues to be strong support for the various housing programs funded through CDBG.

4. Summary of Citizen Participation Process and consultation process

Summary from citizen participation section of plan.

The town followed their Citizen Participation Plan (CPP) during the formation of this year's Annual Action Plan. Efforts to foster resident and stakeholder input included the following:

Public Hearings

Two virtual public hearings were offered at the start of the planning process to gather opinions on previously funded programs, explain CDBG funding and suggest future projects.

Stakeholder Discussions

Each year, a memo is distributed to all department heads and members of the Board of Directors outlining funding availability and describing eligibility for CDBG funds. Recipients of this memo are encouraged to consider project requests received from the public that may be eligible for this funding stream and to develop applications that reflect identified needs. Information was also gathered during service provider meetings, including with the Manchester Community Services Council (MCSC) and the town's Continuum of Care (CoC) group during the planning process for this year's Action Plan.

Board of Directors Public Hearings

Public hearings were included as part of the Board of Directors' meetings in June and July to allow for public feedback on the General Manager's recommendations and the Board of Directors' Proposed Action Plan before the Action Plan was finalized.

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.

Public hearings and opportunities to participate in the planning process were broadly publicized. Despite this, there was very minimal participation in the meetings. Residents were also provided the opportunity to speak at each Board of Directors meeting when information about the plan was presented and no one chose to do so.

Minutes summarizing the discussion during the virtual public hearing are located in the appendix.

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

All comments and views were accepted.

7. Summary

Despite the threat of Covid-19, the Town of Manchester and its sub-recipients have incorporated safety precautions and adapted to ever-changing guidance to enable continued public input and provision of projects to benefit the town's low- and moderate-income residents.

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

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

Describe the agency/entity 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	Manchester, CT	Planning and Economic Development Department

Table 1 – Responsible Agencies

Narrative (optional)

The Planning and Economic Development Department is responsible for administration of the town's Community Development Block Grant funds. The department will also run the CDBG-funded Housing Rehabilitation program. Other activities are implemented by Town departments and nonprofit community organizations.

Consolidated Plan Public Contact Information

Manchester Planning and Economic Development Department
494 Main St.
P.O. Box 191
Manchester, CT 06045-0191

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Community Development Program Manager
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AP-10 Consultation – 91.100, 91.200(b), 91.215(I)

1. Introduction

Manchester employs a variety of methods to solicit information and feedback from the general public and other stakeholders. In preparing this Plan, this included incorporation of the following methods: public hearings, consultation with the town's Continuum of Care, Housing Authority and Housing and Fair Rent Commission, and soliciting input from local officials, town departments and area nonprofits.

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

The Planning and Economic Department seeks to improve coordination of housing and human services providers through participation in the local Continuum of Care group, housing and social service forums, and the Manchester Housing and Fair Rent Commission. The Commission aims is to promote the development and continued availability of affordable housing in Manchester and has ex-officio members including the housing authority's Executive Director and the Town's Planning and Human Services Directors.

The Manchester Community Services Council (MCSC) has operated since 1972 with the primary mission of determining needs, setting priorities and enhancing health and social services within the community. Their Board and membership consists of representatives from mental health and substance abuse organizations, child welfare groups, town government, the housing authority, local healthcare facilities, and a variety of other groups as well as interested town residents.

The privately owned Squire Village affordable housing complex's owners have worked diligently to establish connections with area service providers to increase opportunities for residents. This has included the town library to create an on-site lending library, a local gym for on-site personal training at their community center, a local hospital to provide medical care at an on-site clinic, and a local grocery store for on-site healthy cooking demonstrations and workshops.

Manchester Hospital has created a working group to address underlying issues faced by frequent users of hospital services. This group is one of about a dozen statewide hospital/community collaboratives known as Community Care Teams (CCT). CCT members also act as referral sources by educating participating groups about services and programs provided by their organization or department. Local CCT meetings attract 10-15 attendees each month including mental health providers, first responders, hospital staff, town staff and local social service providers. Ideally, the hospital or another member group identifies residents (with a signed Release of Information) who frequently visit the emergency room or rely on multiple healthcare providers and access points. The team creates a service plan in an effort to reduce service utilization. Effectiveness is measured by monitoring this plan and its impact on emergency room visits.

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.

Manchester is part of the “Balance of State Continuum of Care”. However, the Town and its homeless service providers made a commitment to establishing a "sub-CoC" representing those who serve the Manchester homeless community. This local network provides the opportunity for Town staff, the public schools, local service agencies, and housing providers to meet on a monthly basis and discuss issues of relevance. Members of this group include the Town's Community Development Program Manager and Senior Adult and Family Services (SAFS) Supervisor, staff from the Manchester Housing Authority, representatives from a local private healthcare provider, staff from the local food pantry/soup kitchen, and representatives from housing agencies targeting persons with mental health diagnosis, chronically homeless persons, Veterans and formerly homeless.

Continuation of this localized CoC enables coordination of service delivery to homeless and at-risk households. Members share information about the availability of housing vouchers, shelter beds, and events such as job fairs and renter rebate events that benefit these populations. Participating Manchester Public Schools (MPS) staff work with at-risk youth and assist families with children impacted by homelessness. Other CoC members coordinate with MPS to connect these families with affordable housing, housing vouchers, mental health services and stabilization services.

Staff from Journey Home, a regional homelessness nonprofit, is working with the town’s Youth Service Bureau to evaluate the extent of youth homelessness in Manchester. This will aid in determining the housing and service needs of homeless youth in town.

This past winter, area nonprofits focused on homelessness, social services and social justice banded together and worked with the town to establish a winter warming center for the homeless. The Human Services Director is meeting with a subcommittee of the Board of Directors to determine the best short and long-term approach to addressing the housing needs of Manchester’s homeless population.

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

The Town of Manchester does not receive ESG funds. Through our localized CoC, area nonprofits keep us informed of applications for and receipt of any ESG funds through the Balance of State CoC.

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	MANCHESTER HOUSING AUTHORITY
	Agency/Group/Organization Type	PHA
	What section of the Plan was addressed by Consultation?	Public Housing Needs
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	The Manchester Housing Authority was asked to provide and discuss their revised capital expense plan for the upcoming program year. They were also asked to provide information for the narrative portion detailing local housing authority initiatives, resources, etc.
2	Agency/Group/Organization	Manchester – Planning and Economic Development
	Agency/Group/Organization Type	Other Government - Local
	What section of the Plan was addressed by Consultation?	Other Actions – Affordable Housing and Zoning
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Discussion of AP-75: actions to remove or ameliorate public policies that served as barriers to affordable housing. Highlighted accomplishments at the state level that should allow for more equity in housing options.

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

None.

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	Balance of State CoC	Shared goals of preventing and ending homelessness by connecting homeless residents with housing and social services.

Name of Plan	Lead Organization	How do the goals of your Strategic Plan overlap with the goals of each plan?
Public Act 21-29 (HB 6107)	State Legislature	Updates to the state's Zoning Enabling Act were pushed forward by the group DeSegregateCT. This group advocates for increased equity in zoning laws and a number of their initiatives were passed as part of this plan.
Annual PHA Plan and Capital Fund Program Plan	Manchester Housing Authority	Both aim to provide and improve quality affordable housing to lower-income residents.

Table 3 – Other local / regional / federal planning efforts

Narrative (optional)

None

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

Our methods of soliciting public input and comment were different this year due to the ongoing Covid-19 pandemic. In-person events were not being held in the State of Connecticut so all public participation had to be through online methods.

Flyers were distributed to various community nonprofits and social service groups including the Continuum of Care, Manchester Community Services Council, the housing authority, Leisure, Recreation and Families Department and all current sub-recipient organizations. Information about public meetings was shared on all town social media platforms, in the Manchester Matters emails and on the main page of the Town website. Ads were placed in the regional newspaper, the Journal Inquirer, in an effort to make even more residents aware of opportunities to make comments and share their opinions. The two meetings were held at different times of day to accommodate various schedules.

Information and an application packet were distributed to department heads and members of the Board of Directors to encourage submission of funding applications based upon resident proposals and requests. Application information was discussed with member organizations of the CoC and the MCSC network, and all were encouraged to submit applications to support eligible endeavors. Our Citizen Participation Plan outlines agencies to be notified when application materials are available; all such agencies received information.

The Planning department ran public notices outlining the General Manager's funding recommendations and later the Board of Directors Proposed Annual Action Plan. The Board of Directors also ran public notices for their June and July meetings that included a public hearing on the Proposed Annual Action Plan. The Community Development Program Manager shared a presentation with members of the Board and the public at the Board's June meeting to describe CDBG funding, the types of projects that are eligible and outline the General Manager's funding recommendations. The July Board meeting was held as a hybrid meeting, thereby accommodating residents who wanted to attend in-person as well as those who preferred to participate online. The Town made concert

ed efforts to overcome the numerous challenges to the public participation process brought about by the pandemic. The goal was to remain flexible and provide numerous opportunities and avenues for the public to participate and we succeeded in doing that. Board of Directors meetings were well attended via Zoom but no participants had comments on the Annual Action Plan.

A 30-day comment period was held prior to approval of the finalized Action Plan, but no comments were received.

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 Meeting	Minorities Non-English Speaking - Specify other language: Spanish Persons with disabilities Non-targeted/broad community Residents of Public and Assisted Housing Residents of CDBG-eligible neighborhoods	One resident in attendance (virtually).	A summary of comments is attached.	Not applicable.	

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)
2	Public Meeting	<p>Minorities</p> <p>Non-English Speaking - Specify other language: Spanish, Hindi</p> <p>Persons with disabilities</p> <p>Non-targeted/broad community</p> <p>Residents of Public and Assisted Housing</p> <p>Residents of CDBG-eligible neighborhoods</p>	A second virtual public meeting was offered but no residents signed up to attend.	Not applicable.	Not applicable.	
3	Newspaper Ads	Non-targeted/broad community	No responses received.	No comments received.	Not applicable.	

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)
4	Flyers (for public meetings)	<p>Minorities</p> <p>Persons with disabilities</p> <p>Non-targeted/broad community</p> <p>Residents of Public and Assisted Housing</p> <p>Non-English Speaking - Specify other language: Spanish</p>	No responses received.	No comments received.	Not applicable.	
5	Public Hearing	Non-targeted/broad community	Public hearings were held as part of the Board of Directors' June and July meetings. The meetings were well attended. June was online and July was a hybrid format.	No comments were received from the public regarding the Annual Action Plan for Program Year 47.	No public comments were rejected.	

Table 4 – Citizen Participation Outreach

Expected Resources

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

Introduction

As a HUD Entitlement Community, the Town of Manchester receives an annual CDBG grant from HUD but does not receive HOME, ESG or HOPWA funding. The town’s CDBG entitlement grant for program year 47 is \$573,392. This represents a .06% increase over the prior program year.

To maximize the impact of the CDBG entitlement funds, the Town also expends general government funds, partners with other community funders, and encourages all community-based organizations and project sponsors to strategically leverage additional funds.

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	\$573,392	0	0	\$573,392	\$1,798,600	Expected amount available assumes a slight increase in funding over the remaining three years of this Con Plan.

Table 5 - Expected Resources – Priority Table

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

The Town of Manchester anticipates CDBG funds will leverage significant additional resources. Manchester will continue to encourage CDBG funding sub-recipients to identify and secure such resources. Resources that directly contribute to the furtherance of Consolidated Plan goals will include both public and private sources. Anticipated private sources are likely to include private foundations, faith-based organizations, and individual donors.

The following public resources are anticipated to be leveraged during this Action Plan period:

Town General Funds: The annual Town budget commits resources for priority activities including economic development, code enforcement, services for youth, families and seniors, and improvements to public parks, facilities and infrastructure.

Local Capital Improvement Program (LoCIP) will include portions allocated to benefit lower-income neighborhoods. Town departments will also pursue outside grants to assist low- and moderate-income residents.

CARES Act Funds: Federal funds related to the Covid-19 pandemic will be used to support housing, human services, capital improvements and economic development initiatives eligible for CDBG funding.

Continuum of Care funds: Federal CoC funds awarded to non-profit human service providers to assist in housing and services to homeless persons.

Connecticut Children’s Healthy Homes Program (CCHHP) resources are leveraged to support the Housing Rehab Program for the rehabilitation of renter- and owner-occupied units.

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

While the Town will continue to identify opportunities for publically owned properties to further the community development goals identified within the Consolidated Plan, opportunities are likely to be limited to vacant school buildings and any properties taken for back taxes. The Town’s Repurposed Schools Committee continues forward progress to identify the highest and best use for Manchester’s current and soon to be vacant schools.

While the redevelopment of publically owned land is not identified in this second year Annual Action plan, the Town has prioritized improvements to public infrastructure and improvements to the existing affordable housing supply as activities within this plan.

Discussion

In addition to resources directly leveraged to complete Action Plan activities, additional federal and state funding will fund programs to assist low- and moderate-income residents during the upcoming program year. These resources include the following:

FEDERAL	STATE
USDA School Breakfast Program Summer Food Service Program for Children Child and Adult Care Food Program	DOE Summer School Accountability Program School Breakfast Program
DOE Title 1 Grants to Local Educational Agencies	DCF Youth Service Bureau Youth Service Bureau Enhancement
DHHS Head Start Preventative Health and Health Services Block Grant Substance Abuse & Mental Health Services Projects of Regional & National Significance	OEC Head Start Services Early Care & Education – School Readiness in Priority Districts
DOT Enhanced Mobility for Seniors and Individuals with Disabilities	OPM Property Tax Relief on Property of Totally Disabled Persons
	Judicial Branch Youth Services Prevention
	DOT ADA Dial-A-Ride
	DSS Medicaid
Approximate funding: \$4,561,792	Approximate funding: \$1,175,418

Annual Goals and Objectives

AP-20 Annual Goals and Objectives

Goals Summary Information

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
1	Housing: Improving Quality of Affordable Stock	2020	2024	Affordable Housing Public Housing	HOUSING REHABILITATION ELIGIBLE AREA	Housing	CDBG: \$337,329	Rental units rehabilitated: 6 Household Housing Unit Homeowner Housing Rehabilitated: 14 Household Housing Unit
2	Public Services: Provision of Services to Low/Moderate Income Persons	2020	2024	Homeless Non-Homeless Special Needs		Public Services	CDBG: \$14,000	Public service activities other than Low/Moderate Income Housing Benefit: 670
3	Public Facilities: Maintain, Improve or Repurpose	2020	2024	Public Housing Non-Homeless Special Needs Non-Housing Community Development		Public Facilities & Parks	CDBG: \$48,717	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 5 persons assisted

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
4	Public Improvements	2020	2024	Non-Housing Community Development		Public Improvements / Infrastructure	CDBG: \$59,346	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 1,295 Persons Assisted
5	Planning & Administration	2020	2024	Administration		Housing Public Services Public Facilities and Parks Public Improvements /Infrastructure	CDBG: \$114,000	N/A

Goal Descriptions

1	Goal Name	Housing Rehabilitation
	Goal Description	Increase availability of decent, safe, affordable housing that meets the needs of Manchester residents.
2	Goal Name	Public Services
	Goal Description	Provide public services to benefit the health and well-being of lower income and vulnerable populations. Provision of programs and services that support persons in need, assist in stabilization, and increase access to education, training and employment.
3	Goal Name	Public Facilities & Parks
	Goal Description	Improve public facilities and parks to improve access, increase utilization and expand offerings.
4	Goal Name	Public Improvements
	Goal Description	Improvements to public infrastructure that improve existing conditions such as sidewalk repairs and ADA curb cuts, that enhance development opportunities such as streetscapes in commercial corridors /nodes, or that increase development opportunities.
5	Goal Name	Planning and Administration
	Goal Description	Efficient, compliant administration of the CDBG program.

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

Over the 5 years spanning the 2020-2024 Consolidated Plan, the Town estimates providing rehabilitation assistance to approximately 115 low-moderate income families.

Projects

AP-35 Projects – 91.220(d)

Introduction

All of the projects funded during Program Year 47 support the goals and objectives of the 2020-2024 Consolidated Plan.

Projects

#	Project Name
1	Housing Rehab Program
2	Rebuilding Together Roof Replacements
3	Interval House East
4	Tolland Turnpike Sidewalks
5	Work_Space Accessibility Project
6	MACC Boiler Replacements
7	BrightStart Family Workshop

Table 6 - Project Information

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

The two core housing rehabilitation activities are top priorities due to their impact on the welfare of families assisted and the overall positive impact on older, core neighborhoods. These programs consistently receive support from town residents.

Communities face the unfortunate reality that domestic violence is an ever-present threat to the safety and welfare of residents, particularly women and children. Reports of domestic violence increased significantly due to COVID_19 and the resulting economic impact. Manchester’s CDBG funding for Interval House East will enable the organization to continue providing vital services to residents of our community.

Public Works is focused on filling sidewalk gaps to improve walkability and accessibility. Funding for the Tolland Turnpike sidewalk project will connect residents in an LMA neighborhood with walkable access to a park, bus stops and shopping areas.

AP-38 Project Summary

Project Summary Information

1	Project Name	Housing Rehab Program
	Target Area	MANCHESTER HOUSING REHABILITATION AREA
	Goals Supported	Housing: Improve Quality of Affordable Stock
	Needs Addressed	Housing
	Funding	CDBG: \$195,000
	Description	Address lead-based paint and property maintenance code deficiencies in Manchester homes. In the future, Healthy Home hazards may be added to the program's scope. Also funds an emergency replacement program to address non-functioning boilers, furnaces, etc. that threaten the health and/or safety of residents.
	Target Date	9/30/2022
	Estimate the number and type of families that will benefit from the proposed activities	<p>We anticipate this year's funding will allow us to rehab 2 single-family homes and 1 multi-family property (2 units). We estimate this will provide assistance to 2 rental units (both at the multi-family property) and two owner units (single-family homes). In addition, we expect to help 5 owner-occupied and 2 renter-occupied units through the emergency replacement program.</p> <p>The type of households assisted will depend on the applications received and the urgency with which we need to complete a project.</p>

	Location Description	The Housing Rehab Program does have an applicable "Rehab Program Eligible Area" to target program investment primarily in the Town's core neighborhoods. Despite this, the program does venture outside of these boundaries under some circumstances: when the program partners with CCHHP or when completing an emergency replacement project. The "Eligible Area" does not apply to the emergency replacement portion of the program; this program is available town-wide to households that meet the eligibility criteria.
	Planned Activities	Continue Housing Rehab Program that focuses on lead-based paint and property maintenance code issues. Also continue emergency replacement program to address situations that, if left unaddressed, threaten the health and/or safety of residents.
2	Project Name	Rebuilding Together Roofing Program
	Target Area	Town-wide
	Goals Supported	Housing: Improve Quality of Affordable Stock
	Needs Addressed	Housing
	Funding	CDBG: \$92,329
	Description	Funds roof repair/replacement and, if necessary, repair of chimneys of residential properties occupied by income eligible households.
	Target Date	9/30/2022
	Estimate the number and type of families that will benefit from the proposed activities	Rebuilding Together proposes they will assist a minimum of 7 households through the provision of roof (and possibly related chimney) replacements. Though they do assist some rental households, their program requires that the property owner lives on-site. So the program is primarily geared to assist low-income owner-occupied households. Many homeowners assisted are seniors or disabled.
	Location Description	Town-wide
	Planned Activities	Continue Rebuilding Together's supplemental program that funds roof replacements and chimney repairs for income-qualified households.
3	Project Name	Interval House East

	Target Area	
	Goals Supported	Public Services: Provision of Services to Low/Moderate Income Persons
	Needs Addressed	Public Services
	Funding	\$10,000
	Description	Fund satellite office staff who provide services and assistance to victims of domestic violence in Manchester.
	Target Date	9/30/2022
	Estimate the number and type of families that will benefit from the proposed activities	Interval House East estimates 650 unduplicated survivors of domestic violence in Manchester will be served.
	Location Description	DV Safe House/Undisclosed
	Planned Activities	Provide free, individualized services to each program participant in a confidential manner.
4	Project Name	Tolland Turnpike Sidewalks
	Target Area	
	Goals Supported	Public Improvements
	Needs Addressed	Public Improvements/Infrastructure
	Funding	CDBG: \$59,346
	Description	Install approximately 1,000 linear feet of new sidewalk on the south side of Tolland Turnpike between Union St. and Northwest Park access road.
	Target Date	9/30/2022
	Estimate the number and type of families that will benefit from the proposed activities	Most of the households to benefit are located in eligible block group 5142.001, 860 (66.41%) of whom are low/moderate income.
	Location Description	The project is located in census tract 5142, block group 1.

	Planned Activities	Install new sidewalk to close a gap and provide safe pedestrian access to a nearby park as well as points east on Deming St. and Tolland Tpke.
5	Project Name	Work_Space Accessibility Project
	Target Area	
	Goals Supported	Public Facilities: Maintain, Improve or Repurpose
	Needs Addressed	Public Facilities and Parks
	Funding	CDBG: \$48,717
	Description	Install push button auto operators and fob access control (as needed) to remove barriers to mobility and accessibility at 901-903 Main St.
	Target Date	9/30/2022
	Estimate the number and type of families that will benefit from the proposed activities	This project will complete improvements to one public facility. Both current and future Work_Space members and visitors with physical disabilities will directly benefit from this project.
	Location Description	901-903 Main St.
	Planned Activities	The primary goal is to make this publicly-owned building accessible to persons with physical disabilities, thereby increasing access to programs and services offered at Work_Space.
6	Project Name	MACC Boiler Replacements
	Target Area	
	Goals Supported	Housing: Improve Quality of Affordable Stock
	Needs Addressed	Housing
	Funding	CDBG: \$50,000
	Description	Replace old, energy inefficient boilers serving rental units. Evaluate need for chimney liners.
	Target Date	9/30/2022

	Estimate the number and type of families that will benefit from the proposed activities	It is estimated at least two income-qualified rental households will benefit from the installation of new, energy efficient boilers.
	Location Description	A multi-family property located at 450/452 Main St.
	Planned Activities	Replace boilers serving income-qualified households in rental units.
7	Project Name	BrightStart Family Workshops
	Target Area	
	Goals Supported	Public Services: Provision of Services to Low/Moderate Income Persons
	Needs Addressed	Public Services
	Funding	CDBG: \$4,000
	Description	Fund workshops to equip parents/caregivers with tools to promote healthy brain development and nurture the long-term success of young children.
	Target Date	9/30/2022
	Estimate the number and type of families that will benefit from the proposed activities	It is anticipated that this year's workshops will serve 20 families. The workshops are for entire families to participate – parents, caregivers and children birth through age 8.
	Location Description	In prior years, workshops were held at Adelbrook, 42 Prospect St., but this facility closed to the public for 2021. Unless another opportunity emerges, workshops will be held at BrightStart's office, 20 Hartford Rd. with additional participants online.
	Planned Activities	BrightStart is geared to prepare parents to provide children with the brightest start possible - in school and in life. The program and activities focus on the building blocks for healthy development, known as the ABCD's: A (attention), B (bonding), C (communication) and D (diet).
8	Project Name	Planning & Administration
	Target Area	Town-wide

Goals Supported	Planning & Administration
Needs Addressed	Housing, Public Service, Public Facilities and Parks, Public Improvements/Infrastructure
Funding	\$114,000
Description	Administration of CDBG funds.
Target Date	09/30/2022
Estimate the number and type of families that will benefit from the proposed activities	N/A
Location Description	Town-wide
Planned Activities	Administer funds and provide oversight for CDBG-funded projects.

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

In general, CDBG spending is not limited to specific geographic areas as long as it is an eligible census tract or the household receiving assistance is income-eligible. Public infrastructure and capital improvement projects funded through CDBG are typically located around the center of town since eligible census tracts tend to be more concentrated in this area.

Neighborhoods targeted for Rehab Program assistance are those with the highest percentages of low- and moderate-income households and aged housing stock and infrastructure. They are concentrated in the central area of Manchester and were originally built between the 1880s and 1930s. They are, for the most part, traditional neighborhoods in terms of urban design: grid streets, sidewalks, and large homes on generally smaller lots. Housing is typically one unit detached and duplex, with some four-unit buildings and some larger apartment projects dispersed throughout these neighborhoods.

Geographic Distribution

Target Area	Percentage of Funds
MANCHESTER HOUSING REHABILITATION AREA	34

Table 7 - Geographic Distribution

Rationale for the priorities for allocating investments geographically

Based upon relevant data and the desire to invest funds in an impactful way, the Town’s Board of Directors approved the “Housing Rehab Eligible Area” in 2010 to concentrate housing investment where it seemed most needed and to create a greater impact on our core neighborhoods. The eligible area has a total of 7,319 housing units and of those, 85%, or 6,251, were built prior to 1978.

Despite this targeted investment, the program allows flexibility in spending rehab funds outside of these boundaries when partnering with CCHHP or when performing emergency replacements.

Discussion

The percentage listed above only represents the town’s investment through expenditure of Housing Rehab funds. Manchester’s core neighborhoods, which make up this area, are also the location for a number of other CDBG investments each year.

Affordable Housing

AP-55 Affordable Housing – 91.220(g)

Introduction

The charts below summarize work to be done by the Town through the use of CDBG funds.

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

Table 8 - 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 9 - One Year Goals for Affordable Housing by Support Type

Discussion

The CDBG-funded Rebuilding Together roofing program aims to assist a minimum of 7 households through roof replacements. The Housing Rehab Program plans to assist at least 11 households with CDBG funds this program year. Though not a specific program goal, it is likely some households assisted by Rebuilding Together and the Rehab Program will also serve special needs populations. MACC's project is anticipated to fund the replacement of boilers serving at least two units of affordable housing.

As previously stated, Rebuilding Together's roof replacement program has set a goal of replacing at least 7 roofs. The Housing Rehab Program plans to rehabilitate at least 11 units with CDBG funds. MACC plans to replace old, inefficient boilers serving at least two rental units.

AP-60 Public Housing – 91.220(h)

Introduction

The Manchester Housing Authority manages a rental portfolio that includes both federally and state-funded public housing units. In addition, the agency administers federal and state housing vouchers under contract with John D’Amelia & Associates.

The MHA is recognized as a high-performing Public Housing Authority that has been a leader in public housing modernization and restructuring. The MHA was the first New England housing authority to install a solar field array, which has resulted in reduced utility costs. MHA continues to explore ways to reduce expenditures both for the housing authority as well as its residents.

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

MHA recently submitted their annual PHA Plan for 2021. As a “High Performer PHA”, they were allowed to submit a Streamlined Annual PHA Plan. A significant renovation to their Spencer Village property is wrapping up over the next month or so. For the upcoming year, MHA has funds available for reasonable accommodation requests and energy efficiency upgrades at their scattered site units.

The housing authority is working with a consultant to submit applications to HUD to recapitalize their housing portfolio through the use of the Section 18 Demolition/Disposition streamlined conversion, the Rental Assistance Demonstration (RAD) program and Streamlined Voluntary Conversion (SVC). The intent of this conversion process is to position their housing stock to be eligible for additional funding.

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

The housing authority maintains a Resident Advisory Board, consisting of one representative from each property (including scattered site).

MHA’s Board of Commissioners includes a tenant commissioner who is engaged in the proceedings and decision-making processes of the commission. The current tenant commissioner is serving a 5-year term.

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

The MHA is not a troubled housing authority.

Discussion

The MHA is a critical partner in the provision of affordable housing and efforts to provide housing to elderly and disabled persons. The Town and the MHA will seek to identify opportunities to leverage the housing authority’s capacity to improve quality of life for these subpopulations.

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

Introduction

Manchester's homeless shelter closed as of July 1, 2015 so Manchester no longer offers emergency shelter beds. There has since been a noticeable decrease in the number of homeless individuals visiting the MACC facility where the shelter was formerly located. Despite the shelter closing, MACC continues to offer a soup kitchen, food pantry and a thrift store - as well as counseling and other programs at their complex - to provide support and assistance to Manchester's homeless.

The town's homeless population remains a noticeable presence in the downtown area, especially near bus stops, by the park and the library. MACC and CHR have recognized this and coordinate outreach efforts to both minimize the negative impact on downtown businesses and passersby and connect these individuals with needed services. The two organizations also meet frequently with SAFS to coordinate efforts with the town.

This past winter the Town, in collaboration with area nonprofit partners, operated a Winter Warming Shelter out of the Community Y building. The operation was considered a success in serving the immediate need for providing a warm space for homeless residents. Efforts are underway to explore alternative methods to provide shelter to homeless persons, particularly during the winter months.

Interval House provides services to survivors of domestic violence through an office and shelter in Hartford. In Manchester, they operate a satellite office called Interval House East and staff a Law Enforcement Advocate position in the Police Department. Their Safe House has been operating at capacity for an extended period of time.

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

The town is no longer providing CDBG funds to MACC to perform homeless outreach. MACC contacted the town to say available funding from other resources was sufficient to cover related costs. Their outreach case workers investigate issues reported by the police, engage business owners along Main St. (an area where homeless tend to congregate) and meet with visitors to MACC's Community Kitchen.

MACC staff works tirelessly to provide services to homeless and low-income residents and connect these individuals with programs provided by area organizations or develop new programs to meet identified needs. MACC, CHR and SAFS meet at least monthly to coordinate efforts to connect homeless with housing and support services.

The state also funds homeless outreach at the regional level. CHR holds the contract for this region and a member of its staff provides mental health, substance abuse and housing counseling to the area's unsheltered homeless population through this grant.

Addressing the emergency shelter and transitional housing needs of homeless persons

In Connecticut, shelter bed referrals are handled through the state's 211 system. SAFS and local agencies serving the homeless have provided direct assistance to those needing help navigating the system.

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

Veterans Inc. maintains a strong presence in Manchester. Their efforts, especially combined with those of Dinda House, have created a strong network of support for local Veterans. Local and regional organizations serving Veterans continue efforts to identify property owners in Manchester who will accept HUD-VASH vouchers. Efforts will continue during the upcoming program year to assist Veterans to transition into permanent housing with the necessary support structures.

CHR's "Promise House" has recently completed construction. This property will provide housing and on-site social services for homeless youth that have aged out of the DCF system. The nonprofit recognized the need for this type of housing to keep youth from becoming homeless.

Youth-specific navigators assist homeless youth age 18-24 to identify and secure housing. Youth can be 14 days away from being homeless and still qualify for assistance. Limited rental assistance and security deposits can be provided.

The town's Human Services Department maintains an online list of local rooming houses including location, contact information and prices. These units frequently serve as a bridge between homelessness and permanent housing options for individuals with very low incomes. Organizations such as CHR and MACC and the town's SAFS department will continue to be the strongest presence in efforts to prevent individuals and families from extensive periods of homelessness. Staff works with residents to prevent evictions and help connect homeless families with temporary as well as long-term housing solutions.

Journey Home has "Rapid Exit" funds to help prevent people from re-entering homelessness.

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.

SAFS Human Services Directory provides information on resources available to persons being released from - or trying to prevent - incarceration. The guide lists resources for CHR's Jail Diversion Program, Manchester Alternative in the Community through Community Partners in Action, the Inmate Trust Fund and resources for dealing with substance abuse issues.

As the Local Mental Health Authority for Manchester, CHR is the primary contact for persons being discharged from institutions and systems of care. Their liaison works to connect such clients with resources to meet basic needs and connect them with services. The continued provision of such services will assist families in avoiding homelessness or, in other cases, get their feet back on the ground so they can pursue stable housing and employment.

CHR Center St. Apartments I includes 4 units with DCF referrals and Center St. Apts II includes 5 units set aside for unaccompanied youth. Three units are for Veterans ineligible for HUD VASH vouchers, so this fills a housing and service gap for these individuals. All of these units, including two more for chronically homeless with mental health and substance abuse issues, are supported.

Rapid Rehousing funding is available for a number of different groups in Connecticut, including survivors of domestic violence (DV). Each DV shelter has a housing advocate to assist with locating appropriate housing options.

Rapid Resolution is the VA's diversion money to help prevent couch surfers from becoming completely homeless. This program provides financial assistance directly to people providing shelter to couch surfers.

Journey Home and SAFS continue to receive funding from MISAC to assist renters in Manchester, East Hartford and Vernon. Eligible expenses to assist current renters maintain their housing include up to 3 months of back rent or utility assistance to cover deposits or arrears.

Discussion

Local nonprofits and town departments employ a number of methods to assist the above-named groups. There is additional funding available to address homeless (and other) needs in an effort to curb the negative impacts of Covid-19. These additional resources may or may not still be available during the upcoming program year.

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

Introduction:

Manchester offers a wide variety of housing to persons of all income levels. Although there are limited public policies that create barriers to affordable housing, every community faces barriers that make securing affordable housing challenging for certain populations.

The eviction moratorium has created an extremely challenging rental market. The lack of available units is difficult for all renters but in particular for persons with lower incomes, bad credit, prior evictions or the lack of funds for security deposits frequently 1.5 or even 2 times the monthly rent. SAFS staff has a list of landlords of smaller properties they can contact when assisting residents in need of affordable rentals who may not have a very positive rental history.

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

There is limited developable land remaining in Manchester. Despite this barrier, CHR recently completed construction of Promise House, a development for homeless youth aging out of the DCF system. Looking ahead, developers will likely have to focus primarily on opportunities for adaptive reuse or demolition and new construction for future affordable housing developments.

Recently the Board of Directors approved using a Town ordinance to calculate a lower tax assessment (and related tax) for affordable housing projects in Manchester.

In 2018 and 2019, Town staff assisted the Planning and Zoning Commission in amending zoning regulations in mixed-use and business zones to incentivize multifamily housing accessible to transit. The Town continues to monitor opportunities to encourage transit-oriented development including multifamily and/or affordable units.

In 2021, the Connecticut state legislature enacted Public Act 21-29 making accessory dwelling units (ADUs) legal “as of right”, no longer requiring a special permit or a public hearing. ADUs can be attached or detached and up to 1,000 square feet.

Discussion:

Even prior to the Covid-related eviction moratorium, the supply of quality affordable housing in Manchester did not meet the demand. The Town must continue efforts to identify housing opportunities for those in need as well as maintain and improve the existing affordable housing stock to increase opportunities for low and moderate-income households.

AP-85 Other Actions – 91.220(k)

Introduction:

The Town of Manchester will continue to pursue a variety of methods to meet the needs outlined below. Along with CDBG funds, town departments and local organizations will also use other available resources to meet residents' needs and provide an improved quality of life.

Actions planned to address obstacles to meeting underserved needs

Typically, the primary challenge to meeting underserved needs is the lack of available financial resources. With federal funding to fight the impacts of Covid-19 pouring into communities, funding is currently not the primary issue. Concern has shifted to the lack of staff to manage the funding, create and execute programs and get the resources to those within the community who need it most.

Programs are continuously evaluated to determine effectiveness and whether consolidation of resources would be beneficial. When underserved needs are presented at a forum such as a CoC meeting, members work together to bridge gaps and provide the assistance needed or refer as necessary. Town departments also meet to cover topics of shared relevance, such as the provision of health services or affordable housing. Such collaborative efforts tend to expedite action and reduce duplicative efforts.

Actions planned to foster and maintain affordable housing

CDBG funds continue to be allocated to the Housing Rehab Program whose primary goal is to maintain and improve affordable housing. This program will also continue to partner with CCHHP to improve the safety of affordable units. Additionally, CDBG continues to fund Rebuilding Together's roof replacement program to improve the safety and quality of affordable housing in Manchester. CDBG will also be used to fund boiler replacements for affordable housing units.

MHA is pursuing conversion of units to the Rental Assistance Demonstration (RAD) program. This program is intended to enable housing authorities to address the backlog of deferred maintenance nationwide and finance capital improvements. According to the Executive Director, the housing authority is also researching the application of Section 18 demolition/disposition and repositioning.

Local nonprofit developers will continue to pursue opportunities for new construction and acquisition of additional vouchers to increase the supply of affordable housing.

Actions planned to reduce lead-based paint hazards

The Town will continue to fund the Housing Rehabilitation Program that focuses on remediation of lead paint hazards. In addition, CCHHP will fund lead projects in Manchester and the town's program will continue to partner with them to leverage funds and increase the capacity of both programs.

As the Planning Department becomes aware of RRP training programs in CT, this information is passed on to contractors visiting the department. Registration information is also made available on the Building Department's bulletin board within clear site of contractors stopping in for permits. This is in an effort to increase the number of RRP trained contractors who can help prevent unnecessarily exposing

residents to lead hazards.

The Health Department will continue to send Environmental Health Inspectors into the field for lead inspections and to investigate lead orders. There are currently 4 certified lead inspector/risk assessors within the department. The department also educates the public about the dangers of lead paint and ways to prevent exposure. Their nurse attends numerous community fairs and events each year to provide information and education about lead-based paint and provides brochures on the Housing Rehab Program to interested parties. In instances of children with elevated blood lead levels, the Health Department makes referrals to the Rehab Program and CCHHP.

Actions planned to reduce the number of poverty-level families

MACC's Executive Chef runs a culinary and hospitality training program focused on low-income, homeless and those at-risk of homelessness. The 12-week course provides life skills while also preparing participants for a potential career in the hospitality or food services industry.

MACC operates a successful restaurant in Manchester's downtown that offers "upscale bistro fare in a casual setting with great service". Bistro on Main is a training kitchen for graduates of their culinary program before they seek external employment. Employees are a mix of individuals experienced in the field and culinary program graduates. The restaurant continues to receive positive reviews for both their food and their mission.

Manchester Adult & Continuing Education offers opportunities for adults who want to improve their educational attainment and/or economic situation. The group continues to work closely with the local American Job Center office to provide residents with a smooth transition between education and job opportunities.

Actions planned to develop institutional structure

Institutional structures within Manchester have been developed and improved over time to a point where they are relatively coordinated and efficient. We will continue efforts to improve coordination as opportunities are identified.

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

We try to maintain open lines of communication between agencies and departments serving the housing and social service needs of town residents. This coordination is improved through groups such as the Continuum of Care, Manchester Community Services Council and publication of the Human Services Directory. Referrals are frequently made between town departments, to local and regional service providers or even to 211 for general assistance.

The Planning and Human Services Department Directors, as well as the Executive Director of the housing authority, all serve as ex-officio members of the Housing and Fair Rent Commission. They participate in meetings to share updates and information with Commission members.

The Squire Village subsidized housing complex is privately owned but the property's Resident Services

Coordinator and social workers continue to develop partnerships with town departments, the Manchester Police Department, local businesses and community organizations to meet residents' needs and interests both on-site and within the larger community.

The Executive Director and Resident Services Coordinator for the MHA maintain contact with the Planning and Human Services Department to discuss initiatives, consistency of plans and tenant needs that require referrals.

The Human Services Department maintains a list of local landlords that have housed special needs populations in the past so they can be contacted when new potential tenants are identified.

Discussion:

Much of Manchester's success in serving low and moderate-income residents is attributable to continuous efforts to improve coordination and collaboration. In last year's Annual Action Plan, a new group, called the Town Agency Collaboration, was discussed. This group, which includes representatives from a number of town departments including Planning, Human Services, the Senior Center, Fire, Police, Building, Customer Service and the Health Department, continues to meet each month. Staff from these departments noticed the frequency with which the same client or household would be served by multiple departments. This group's outreach expanded this year to include presentations at town staff supervisory meetings. Town staff and local organizations continue to identify ways in which we can better serve the public.

Program Specific Requirements

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

Introduction:

As outlined below, no program income is anticipated during the course of this Action Plan.

Community Development Block Grant Program (CDBG)

Reference 24 CFR 91.220(l)(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%

The overall benefit calculation used by the Town of Manchester spans a three year period. The period of applicability for this Action Plan will include the following years: 2021, 2022, 2023.