

Executive Summary

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

1. Introduction

In compliance with HUD's regulations, the Borough of Berwick has prepared an Annual Action Plan, which will be utilized for FFY 2024. This Annual Action Plan highlights challenges and opportunities in focus areas such as housing, community, and economic development needs, as well as generating priorities within the Borough of Berwick.

The Annual Action Plan outlines goals for the Borough of Berwick as presented and anticipated during the next year by outlining initiatives the Berwick Borough Council may be willing to undertake addressing identified needs. This FFY 2024 Annual Action Plan is a collaborative effort between the Borough of Berwick, SEDA-Council of Governments (SEDA-COG), the community at large, social service agencies, housing providers, community development agencies, and economic development groups. The planning process was accomplished through a series of public meetings, stakeholder consultation interviews, and collaboration.

2. Summarize the objectives and outcomes identified in the Plan

As part of the Annual Action Plan, the community must develop goals and objectives. The following goals and objectives have been identified for the Borough of Berwick for the period of FFY 2024 for the CDBG Program:

Housing Priority - (High Priority)

There is a need to improve the quality of the housing stock in the Borough of Berwick, and to increase the supply of affordable, decent, safe, sound, and accessible housing for homeowners, renters, and homebuyers.

- **HS-1: Fair Housing** – Support education, enforcement/reporting, and/or evaluation/study of Fair Housing rights and other housing related topics relevant to the public.
- **HS-2: Housing Stock** - Support efforts to create new units of affordable and/or accessible housing as well as maintain and improve the quality of older homes, including elimination of slum and blighting conditions.

Other Special Needs Priority - (Low Priority)

There is a need for services and facilities for the youth, elderly, persons with disabilities, victims of domestic violence, persons with HIV/AIDS, and persons with special needs.

- **SN-1 Public Safety** – Improvement in the ability to respond to emergency situations.
- **SN-2 Social Services** - Support social service programs and facilities for the youth, elderly, persons with disabilities, victims of domestic violence, persons with HIV/AIDS, and persons with other special needs.

Community and Economic Development Priority - (High Priority)

There is a need to improve the public and community facilities, infrastructure, employment, and the quality of life in the Borough of Berwick.

- **DV-1 Community Facilities** - Improve the parks, recreational centers, trails, bikeways, and public and community facilities through rehabilitation, new construction, and handicap accessibility improvements.
- **DV-2 Infrastructure** - Improve infrastructure through rehabilitation, reconstruction, and new construction of streets, sidewalks, ADA curb cut ramps, sewer, water, storm water management, flood protection, bridges, green infrastructure, etc.
- **DV-3 Employment** - Support and encourage job creation, job retention, and job training opportunities as well as entrepreneurship and small business development.

Administration, Planning, and Management Priority - (High Priority)

There is a continuing need for planning, administration, management, and oversight of Federal, state, and local funding grant programs.

- **AM-1 Overall Coordination** - Provide program management and oversight for the successful administration of federal, state, and local funding programs, including planning services for special studies, environmental clearance, fair housing, and compliance with all Federal, state, and local laws and regulations.

Assignment of Priority Discussion:

High Priority - Activities are assigned a high priority if the Borough of Berwick will likely utilize CDBG funds to finance activities during the Five-Year Consolidated Plan period.

Low Priority - Activities are assigned a low priority if the activity may not be funded by the Borough of Berwick during the Five-Year Consolidated Plan period. The Borough of Berwick may support applications for other funding if those activities are consistent with the needs identified in the Five-Year Consolidated Plan.

3. Evaluation of past performance

The Borough of Berwick is an eight-year federal Entitlement community.

The FFY 2017 through FFY 2022 Consolidated Annual Performance Evaluation Reports (CAPER) have been submitted to HUD regarding how the Borough of Berwick has expended its funds.

The FFY 2023 Consolidated Annual Performance Evaluation Report will report on the use of FFY 2023 funds. This report will be submitted by the end of the calendar year 2024.

4. Summary of Citizen Participation Process and consultation process

In preparation for the development of the 2024 Annual Action Plan, consultation meetings occurred with the Columbia County Housing Authority (who also has a representative on the regional Continuum of Care Board), Columbia County Human Service Coalition, businesses, developers, nonprofit organizations, philanthropic organizations, and community and faith-based organizations. A notice was mailed out on April 19, 2024, to the various contacted organizations regarding the initiation of the CDBG application preparation schedule.

As a component of this schedule, the Borough of Berwick held its first public hearing Tuesday, May 6, 2024. This meeting was held in the council chambers at 1800 North Market Street Berwick, PA at 7:00PM. The hearing is based on the needs of the community and its residents. The hearing also provided the residents, agencies, and organizations with the opportunity to discuss the Borough of Berwick's CDBG program, and to provide suggestions for future CDBG program priorities and activities.

SEDA-COG then emailed all the agencies and organizations that were contacted as part of the consultation process, to let them know that the FFY 2024 Action Plan would be on public display. The comment period for the FFY 2024 Annual Action Plan began on June 10, 2024. A copy of the "FFY 2024 Annual Action Plan" was published and made available for display and comment at the following locations:

1. Borough of Berwick
1800 North Market Street
Berwick, PA 18603
2. SEDA-COG's website:
<http://www.sedacog.org/Pages/communitydevelopment.aspx>

A final public hearing was scheduled for Tuesday, July 1, 2024, coinciding with a regularly scheduled Berwick Borough Council meeting, Berwick City Hall, 7:00 PM. The hearing gave the public a final opportunity to comment on the Borough's plan.

The comment period for the FFY 2024 Annual Action Plan ended on July 10, 2024. Please refer to the minutes of the public hearings for further comment documentation as well as the public comment summary.

5. Summary of public comments

Notices were advertised in the *Press Enterprise*, the local newspaper of circulation, regarding the borough's public hearing in order to invite comment. Public comment was also invited for thirty (30) days regarding the Annual Action Plan.

Comments received at the borough's public hearings, as well as during the thirty (30) day comment period are included as public hearing meeting minutes and are included within the addendums of the FFY 2024 Annual Action Plan.

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

All comments and suggestions received to date have been accepted and incorporated into the Five-Year Consolidated Plan.

7. Summary

The primary goal of the FFY 2024 Annual Action Plan will be to implement strategies and work toward goals related to challenges identified in the Five-Year Consolidated Plan. Through this Five-Year Consolidated Plan study effort, baseline goals were established to work toward improving the housing conditions, and address community and economic development needs.

For FFY 2024 program year, the following CDBG allocation will be distributed to the Borough of Berwick: \$289,751.

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 Recipient	Damien Scoblinc	Borough of Berwick
CDBG Administrator	Tyler Dombroski	SEDA-COG
CDBG Administrator	Leslie Hosterman	SEDA-COG

Table 1 – Responsible Agencies

Narrative

The mission of the Community Development Program at SEDA-COG is to work with local governments and their citizens to improve communities and the lives of community residents through infrastructure and community facility projects. Recipients of SEDA-COG’s Community Development services include the region’s counties, communities, municipal authorities, and locally based organizations.

Success is assisting a community through the planning, development, design, funding, and construction of much needed public infrastructure or community facility projects. In the last 30 years, SEDA-COG's Community Development Program has assisted with nearly 1,000 public infrastructure and community facility projects, resulting in community investments of nearly half a billion dollars.

Consolidated Plan Public Contact Information

Tyler J. Dombroski
Director Community Development
SEDA-Council of Governments
201 Furnace Road, Lewisburg, PA 17832
570-524-4491 (v) 570-524-9190 (f)
email: tdombroski@seda-cog.org

Leslie M. Hosterman
Program Analyst
SEDA - Council of Governments
201 Furnace Road, Lewisburg, PA 17837
570-524-4491 (v) 570-524-9190 (f)
Email: lhosterman@seda-cog.org

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

1. Introduction

The Borough of Berwick and its CDBG Administrator, SEDA-COG, held a series of consultation meetings during spring of 2021. Upon completion of the initial consultation meetings and interviews, a SEDA-COG representative attended the bi-monthly meeting of the Columbia County Human Service Coalition. At this meeting, the SEDA-COG representative informed local providers of the Borough's effort to undertake this Five-Year Consolidated Plan and invited the providers an opportunity to schedule additional consultation meetings/interviews to participate in this effort. Input from the consultation meetings was used in the development of the specific strategies and priorities for this Five-Year Consolidated Plan. Public hearings were scheduled in accordance with the Borough of Berwick's adopted Citizen Participation Plan to provide the public an opportunity to comment on the development of this Plan

Organizations that participated during the consultation process of the Five-Year Consolidated Plan have been notified of the FFY 2024 CDBG program's initiation through an outreach letter. Additionally, an announcement was made at a bi-monthly Columbia County Human Services Coalition meeting about the FFY 2024 Annual Action Plan's development and the opportunity for CDBG program funding for projects. Public advertising also occurred.

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

The Borough of Berwick will work with the following agencies to enhance coordination:

Responsible Entity	Responsible Entity Type	Role	Geographic Area Served
The Borough of Berwick	Government agency	Community Development – Public Facilities, Neighborhood Improvements, Public Services, Economic Development Planning	Jurisdiction
Central PA Continuum of Care	Government agency	Homelessness	Region
Columbia County Housing Authority	PHA	Affordable Housing: Ownership Affordable Housing: Rental Public Housing	Region
Columbia County Human Service Coalition Member Organizations	Nonprofit organization	Homelessness Non-homeless special needs	Region
Columbia Montour Chamber of Commerce	Private Industry	Economic Development Planning	Region
Community Strategies Group	Redevelopment authority	Affordable Housing: Ownership Affordable Housing: Rental Community Housing Development Organization (CHDO) Planning	Region

DRIVE	Government agency	Economic Development Planning	Region
SEDA-COG	Government agency	Community Development – Public Facilities, Neighborhood Improvements, Public Services, Economic Development Planning	Region

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.

Columbia County is part of Central Valley Regional Homeless Advisory Boards. There are 5 (Regional Homeless Advisory Boards in the Eastern PA Continuum of Care, and each Regional Homeless Advisory Boards has two representatives on the Continuum of Care’s Funding Committee. Each year the Continuum of Care conducts a gaps analysis, using data from the homeless service system, to identify needs and gaps within the Continuum of Care. This analysis includes a review of needs both at the Continuum of Care level, but also at the region and county level. The Continuum of Care Funding Committee uses this analysis to inform funding decisions about the needs of people experiencing homelessness, including chronically homeless, families with children, veterans, and youth.

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 Continuum of Care has three mechanisms by which local organizations may be involved in funding decisions, developing performance standards/evaluating outcomes, and developing funding policies/procedures.

1) Regional Homeless Advisory Board meetings - There are five regions in the Pennsylvania Continuum of Care, each represented by a Regional Homeless Advisory Board RHAB. Columbia County is part of Central Valley RHAB. Local organizations are encouraged to participate in these meetings. These meetings serve to keep Continuum of Care members updated on what is going on in the Continuum of Care, solicit input from members on needs within the Continuum of Care, and allow members to connect with one another and share resources.

2) Funding Committee - Each Regional Homeless Advisory Board has two representatives on the Continuum of Care's Funding Committee. Each year the Continuum of Care conducts a gaps analysis, using data from the homeless service system to identify needs and gaps within the Continuum of Care. This analysis includes a review of needs both at the Continuum of Care level, but also at the region and county level. The Continuum of Care Funding Committee uses this analysis to inform funding decisions about the needs of people experiencing homelessness, including chronically homeless, families with children, veterans, and youth. The Funding Committee also leads the process of developing performance evaluation standards. All Continuum of Care funded projects are evaluated based on their performance annually, which informs which projects are renewed for ongoing funding.

3) Data Committee - Any Continuum of Care member can join the Data Committee. The Data Committee is charged with reviewing Continuum of Care level and project level data, developing performance benchmarks, and evaluating outcomes across the Continuum of Care.

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

All agencies listed below were contacted regarding the FFY 2024 Annual Action Plan development process.

1	Agency/Group/Organization	Columbia County Commissioners' Office
	Agency/Group/Organization Type	Other government - County Civic Leaders
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Lead-based Paint Strategy Public Housing Needs Homelessness Strategy Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Non-Homeless Special Needs HOPWA Strategy Economic Development Market Analysis Anti-poverty Strategy
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Public advertisement, outreach letter; Housing and Community Development priorities.

2	Agency/Group/Organization	Agape
	Agency/Group/Organization Type	Services-homeless Regional organization Faith Based Neighborhood Organization
	What section of the Plan was addressed by Consultation?	Homelessness Strategy Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Non-Homeless Special Needs Anti-poverty Strategy
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Public advertisement, outreach letter, regular attendance at Columbia County Human Services Coalition meetings; Housing and Community Development priorities.
3	Agency/Group/Organization	Central Susquehanna Community Foundation
	Agency/Group/Organization Type	Services-Health Business Leaders Civic Leaders Business and Civic Leaders Community Development Financial Institution Foundation Neighborhood Organization

	What section of the Plan was addressed by Consultation?	Economic Development Anti-poverty Strategy
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Public advertisement, outreach letter; Housing and Community Development priorities.
4	Agency/Group/Organization	CMSU
	Agency/Group/Organization Type	Services-Persons with Disabilities Health Agency Child Welfare Agency Regional organization
	What section of the Plan was addressed by Consultation?	Homelessness Strategy Anti-poverty Strategy
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Public advertisement, outreach letter, regular attendance at Columbia County Human Services Coalition meetings; Housing and Community Development priorities.
5	Agency/Group/Organization	Columbia County Family Center
	Agency/Group/Organization Type	Services-Children Child Welfare Agency Publicly Funded Institution/System of Care Regional organization
	What section of the Plan was addressed by Consultation?	Homeless Needs - Families with children Anti-poverty Strategy

	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Public advertisement, outreach letter, regular attendance at Columbia County Human Services Coalition meetings; Housing and Community Development priorities.
6	Agency/Group/Organization	Columbia Montour Chamber of Commerce
	Agency/Group/Organization Type	Services-Employment Regional organization Planning organization Business Leaders Civic Leaders Business and Civic Leaders
	What section of the Plan was addressed by Consultation?	Economic Development Market Analysis
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Public advertisement, outreach letter; Housing and Community Development priorities.
7	Agency/Group/Organization	Columbia County Career Link
	Agency/Group/Organization Type	Services-Employment Regional organization Business Leaders Business and Civic Leaders
	What section of the Plan was addressed by Consultation?	Economic Development Market Analysis

	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Public advertisement, outreach letter; Housing and Community Development priorities.
8	Agency/Group/Organization	Berwick Area United Way
	Agency/Group/Organization Type	Regional organization Civic Leaders Business and Civic Leaders Community Development Financial Institution Foundation
	What section of the Plan was addressed by Consultation?	Economic Development Market Analysis Anti-poverty Strategy
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Public advertisement, outreach letter, regular attendance at Columbia County Human Services Coalition meetings; Housing and Community Development priorities.
9	Agency/Group/Organization	CARING COMMUNITY FOR AIDS
	Agency/Group/Organization Type	Services-Persons with HIV/AIDS Health Agency Publicly Funded Institution/System of Care
	What section of the Plan was addressed by Consultation?	HOPWA Strategy Anti-poverty Strategy
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Public advertisement, outreach letter, regular attendance at Columbia County Human Services Coalition meetings; Housing and Community Development priorities.

10	Agency/Group/Organization	Columbia County Human Services Coalition
	Agency/Group/Organization Type	Publicly Funded Institution/System of Care Planning organization
	What section of the Plan was addressed by Consultation?	Homelessness Needs - Veterans Anti-poverty Strategy
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Public advertisement, outreach letter, regular attendance at Columbia County Human Services Coalition meetings; Housing and Community Development priorities.
11	Agency/Group/Organization	Columbia-Montour Visitors Bureau
	Agency/Group/Organization Type	Services-Employment Regional organization Planning organization Business Leaders Civic Leaders Business and Civic Leaders
	What section of the Plan was addressed by Consultation?	Economic Development Market Analysis Anti-poverty Strategy
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Public advertisement, outreach letter; Housing and Community Development priorities.

12	Agency/Group/Organization	Columbia County Housing and Redevelopment Authority
	Agency/Group/Organization Type	Housing PHA Services - Housing Services-homeless Service-Fair Housing Publicly Funded Institution/System of Care Regional organization Planning organization Civic Leaders Business and Civic Leaders
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Public Housing Needs Homelessness Strategy Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Non-Homeless Special Needs Economic Development Market Analysis Anti-poverty Strategy
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Public advertisement, outreach letter, regular attendance at Columbia County Human Services Coalition meetings; Housing and Community Development priorities.

13	Agency/Group/Organization	Columbia Montour Area Agency on Aging
	Agency/Group/Organization Type	Housing PHA Services - Housing Services-Elderly Persons Services-Persons with Disabilities Services-homeless Service-Fair Housing Publicly Funded Institution/System of Care Regional organization
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Public Housing Needs Homelessness Strategy Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Non-Homeless Special Needs Market Analysis Anti-poverty Strategy
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Public advertisement, outreach letter, regular attendance at Columbia County Human Services Coalition meetings; Housing and Community Development priorities.

14	Agency/Group/Organization	Columbia County Volunteers in Medicine Clinic, Inc.
	Agency/Group/Organization Type	Services-Children Services-Elderly Persons Services-Persons with Disabilities Services-Persons with HIV/AIDS Services-Health Health Agency Publicly Funded Institution/System of Care
	What section of the Plan was addressed by Consultation?	Non-Homeless Special Needs HOPWA Strategy Anti-poverty Strategy
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Public advertisement, outreach letter, regular attendance at Columbia County Human Services Coalition meetings; Housing and Community Development priorities.
15	Agency/Group/Organization	Berwick Borough
	Agency/Group/Organization Type	Other government – Local

	<p>What section of the Plan was addressed by Consultation?</p>	<p>Housing Need Assessment Lead-based Paint Strategy Public Housing Needs Homelessness Strategy Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Non-Homeless Special Needs HOPWA Strategy Economic Development Market Analysis Anti-poverty Strategy</p>
	<p>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</p>	<p>Public advertisement, regular attendance at Borough Council meetings and work sessions; Housing and Community Development priorities.</p>
<p>16</p>	<p>Agency/Group/Organization</p>	<p>Susquehanna Greenway</p>
	<p>Agency/Group/Organization Type</p>	<p>Services-Health Business Leaders Civic Leaders Business and Civic Leaders Community Development Financial Institution Foundation Neighborhood Organization</p>

	What section of the Plan was addressed by Consultation?	Economic Development Anti-poverty Strategy
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Public advertisement, outreach letter; Housing and Community Development priorities.
17	Agency/Group/Organization	Berwick Area YMCA
	Agency/Group/Organization Type	Services-Health Civic Leaders Business and Civic Leaders Neighborhood Organization
	What section of the Plan was addressed by Consultation?	Economic Development Anti-poverty Strategy
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Public advertisement, outreach letter; Housing and Community Development priorities.
18	Agency/Group/Organization	DC Center - Independent Living
	Agency/Group/Organization Type	Housing PHA Services - Housing Services-Elderly Persons Services-Persons with Disabilities Services-homeless Publicly Funded Institution/System of Care Regional organization

	What section of the Plan was addressed by Consultation?	Housing Need Assessment Public Housing Needs Homelessness Strategy Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Non-Homeless Special Needs Market Analysis Anti-poverty Strategy
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Public advertisement, outreach letter; Housing and Community Development priorities.
19	Agency/Group/Organization	National Organization - Disability
	Agency/Group/Organization Type	Housing PHA Services - Housing Services-Elderly Persons Services-Persons with Disabilities Services-homeless Service-Fair Housing Publicly Funded Institution/System of Care Regional organization

	What section of the Plan was addressed by Consultation?	Housing Need Assessment Public Housing Needs Homelessness Strategy Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Non-Homeless Special Needs Market Analysis Anti-poverty Strategy
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Public advertisement, outreach letter; Housing and Community Development priorities.
20	Agency/Group/Organization	Eastern Seals Western and Central Pennsylvania
	Agency/Group/Organization Type	Housing PHA Services - Housing Services-Elderly Persons Services-Persons with Disabilities Services-homeless Service-Fair Housing Publicly Funded Institution/System of Care Regional organization

	<p>What section of the Plan was addressed by Consultation?</p>	<p>Housing Need Assessment Public Housing Needs Homelessness Strategy Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Non-Homeless Special Needs Market Analysis Anti-poverty Strategy</p>
	<p>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</p>	<p>Public advertisement, outreach letter; Housing and Community Development priorities.</p>
21	<p>Agency/Group/Organization</p>	<p>Easter Seals Eastern Pennsylvania</p>
	<p>Agency/Group/Organization Type</p>	<p>Housing PHA Services - Housing Services-Elderly Persons Services-Persons with Disabilities Services-homeless Service-Fair Housing Publicly Funded Institution/System of Care Regional organization</p>

	What section of the Plan was addressed by Consultation?	Housing Need Assessment Public Housing Needs Homelessness Strategy Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Non-Homeless Special Needs Market Analysis Anti-poverty Strategy
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Public advertisement, outreach letter; Housing and Community Development priorities.
22	Agency/Group/Organization	Northeast Pennsylvania Center for Independent Living
	Agency/Group/Organization Type	Housing PHA Services - Housing Services-Elderly Persons Services-Persons with Disabilities Services-homeless Service-Fair Housing Publicly Funded Institution/System of Care Regional organization

	What section of the Plan was addressed by Consultation?	Housing Need Assessment Public Housing Needs Homelessness Strategy Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Non-Homeless Special Needs Market Analysis Anti-poverty Strategy
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Public advertisement, outreach letter; Housing and Community Development priorities.
23	Agency/Group/Organization	Eastern PA Continuum of Care
	Agency/Group/Organization Type	Regional organization
	What section of the Plan was addressed by Consultation?	Homelessness Strategy Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Public advertisement, outreach letter; Housing and Community Development priorities.

24	Agency/Group/Organization	Community Strategies Group
	Agency/Group/Organization Type	Housing Services - Housing Service-Fair Housing Regional organization
	What section of the Plan was addressed by Consultation?	Public Housing Needs
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Public advertisement, outreach letter, email, regular attendance at Columbia County Human Services Coalition meetings; Housing and Community Development priorities.
25	Agency/Group/Organization	Central Susquehanna Opportunities
	Agency/Group/Organization Type	Services - Housing Services-Children Services-Elderly Persons Services-Persons with Disabilities Services-Persons with HIV/AIDS Services-Victims of Domestic Violence Services-homeless Services-Health Services-Education Services-Employment Service-Fair Housing Services - Victims Regional organization

	What section of the Plan was addressed by Consultation?	Homelessness Strategy Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Public advertisement, outreach letter, email, regular attendance at Columbia County Human Services Coalition meetings; Housing and Community Development priorities.
26	Agency/Group/Organization	DRIVE
	Agency/Group/Organization Type	Services - Broadband Internet Service Providers Services - Narrowing the Digital Divide
	What section of the Plan was addressed by Consultation?	Homelessness Strategy Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Economic Development
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Public advertisement, outreach letter, email; Housing and Community Development priorities.

27	Agency/Group/Organization	SEDA-COG
	Agency/Group/Organization Type	Housing Services - Housing Agency - Managing Flood Prone Areas Agency - Management of Public Land or Water Resources Agency - Emergency Management Regional organization
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Lead-based Paint Strategy Non-Homeless Special Needs Economic Development
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Public advertisement, outreach letter, email; Housing and Community Development priorities.
28	Agency/Group/Organization	The Gate House
	Agency/Group/Organization Type	Services-homeless Regional organization
	What section of the Plan was addressed by Consultation?	Homeless Needs - Families with children
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Public advertisement, outreach letter, regular attendance at Columbia County Human Services Coalition meetings; Housing and Community Development priorities.
29	Agency/Group/Organization	Beyond Violence
	Agency/Group/Organization Type	Services-homeless Services-Victims of Domestic Violence

	What section of the Plan was addressed by Consultation?	Homeless Needs - Families with children
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Public advertisement, outreach letter, regular attendance at Columbia County Human Services Coalition meetings; Housing and Community Development priorities.

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

All agency types were consulted and contacted during the planning process.

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

Name of Plan	Lead Organization	How do the goals of your Strategic Plan overlap with the goals of each plan?
Continuum of Care	Central Valley Regional Homeless Advisory Board (Central RHAB)	They are incorporated in the Five-Year Consolidated Plan and the Annual Action Plans.
FFY 2020 Annual Action Plan	The Borough of Berwick	They are incorporated in the Five-Year Consolidated Plan and the Annual Action Plans.
FFY 2021 Annual Action Plan	The Borough of Berwick	They are incorporated in the Five-Year Consolidated Plan and the Annual Action Plans.
FFY 2022 Annual Action Plan	The Borough of Berwick	They are incorporated in the Five-Year Consolidated Plan and the Annual Action Plans.
FFY 2023 Annual Action Plan	The Borough of Berwick	They are incorporated in the Five-Year Consolidated Plan and the Annual Action Plans.
FFY 2016-FFY 2020 Consolidated Plan	The Borough of Berwick	They are incorporated in the Five-Year Consolidated Plan and the Annual Action Plans.

Name of Plan	Lead Organization	How do the goals of your Strategic Plan overlap with the goals of each plan?
FFY 2020-FFY 2024 Analysis of Impediments Fair Housing Study	The Borough of Berwick	They are incorporated in the Five-Year Consolidated Plan and the Annual Action Plans.
Columbia County Hazard Mitigation Plan Update	Columbia County	They are incorporated in the Five-Year Consolidated Plan and the Annual Action Plans.
Comprehensive Economic Development Strategy	SEDA-COG	They are incorporated in the Five-Year Consolidated Plan and the Annual Action Plans.
Long Range Transportation Plan	SEDA-COG	They are incorporated in the Five-Year Consolidated Plan and the Annual Action Plans.

Table 2 – Other local / regional / federal planning efforts

Narrative

The Borough of Berwick has consulted with various agencies which has culminated in the development of this FFY 2021-2025 Five-Year Consolidated Plan. Below is a non-exhaustive list of organizations represented at Columbia County Human Service Coalition Meetings:

- Columbia County Family Center
- Columbia County Children and Youth Services
- Columbia County Juvenile Probation
- Columbia County Commissioners
- Columbia Child Development Program/ Head Start

- AGAPE
- Columbia County Volunteers in Medicine
- Danville Child Development Center
- Central Susquehanna Community Foundation
- Columbia/Montour Area Agency on the Aging
- CMSU Behavioral Health/Drug and Alcohol
- Central Susquehanna Intermediate Unit
- Central Susquehanna Intermediate Unit
- AmeriHealth Caritas Pennsylvania
- Gatehouse Shelter
- Caring Communities
- Central Susquehanna Opportunities Inc.
- SEDA-COG
- Central Pennsylvania Workforce Development Corp. (CPWDC)
- The Women's Center Inc
- Geisinger Nurse Family Partnership/Free2BMoms
- Consumer

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 Borough of Berwick followed its Citizens Participation Plan to develop this FFY 2024 Annual Action Plan including:

- Email and written letter outreaches to local organizations.
- Regular attendance at Columbia County Human Service Coalition meetings.
- Two public hearings at different stages of the application preparation schedule.
- Newspaper advertisements encouraging participation and comment.
- Public display of the draft FFY 2024 Annual Action Plans.

Through the citizen participation process, public input was used to identify what challenges and opportunities exist in Berwick, as well as develop goals to mitigate these issues.

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	Notice to community organizations	Minorities Persons with disabilities Non-targeted/broad community Residents of Public and Assisted Housing	Sent via US Mail to community organizations and agencies.	No comments received.	No comments received.	N/A

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 Hearing	Minorities Non-English Speaking - Specify other language: Assistance provided upon request Persons with disabilities Non-targeted/broad community Residents of Public and Assisted Housing	Varied. Refer to attached sign-in sheets for attendance records.	Refer to minutes of public hearings attached to this Consolidated Plan.	All comments were accepted.	N/A

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	Newspaper Ad	Minorities Non-English Speaking - Specify other language: Assistance provided upon request Persons with disabilities Non-targeted/broad community Residents of Public and Assisted Housing	All advertisements circulated in the local newspaper of circulation, the <i>Press Enterprise</i> .	No comments received.	No comments received.	http://www.presseenterpriseonline.com/

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	Annual Action Plan Comment Period	Minorities Persons with disabilities Non-targeted/broad community Residents of Public and Assisted Housing	Varied. Refer to attached documentation of comments received.	No comments received.	No comments received.	https://seda-cog.org/departments/community-development/hud-documentation/

Table 4 – Citizen Participation Outreach

Table 3 – Citizen Participation Outreach

Expected Resources

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

Introduction

The Borough of Berwick will receive \$289,751.00 of FFY 2024 CDBG funds.

The program year goes from October 1, 2024 through September 30, 2025. The accomplishments of these activities will be reported in the FFY 2024 Consolidated Annual Performance and Evaluation Report (CAPER).

Anticipated Resources

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 4				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
CDBG (Borough of Berwick)	Public-Federal	<ul style="list-style-type: none"> • Acquisition • Admin and Planning • Economic Development • Housing • Public Improvement • Public Services 	\$289,751.00	\$0.00	\$895,418.00	\$0.00	\$289,751.00	Berwick Borough completed a Consolidated Plan for FFY2021-FFY2025.

Table 4 - 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

In addition to the CDBG entitlement funds, the Borough of Berwick anticipates the following resources may be available to local partners to undertake the strategies identified in the Five-Year Consolidated Plan:

- American Rescue Plan-State Local Fiscal Recovery Funds

- Columbia County Access Grant Program
- Community Development Block Grant – Coronavirus Response
- Community Health Choices
- Emergency Solutions Grant
- First Time Home Buyers Assistance Program
- HOME Program
- Infrastructure Investment and Jobs Act
- Low-Income Housing Tax Credit Program (LIHTC)
- Pennsylvania Assistive Technology Foundation
- Pennsylvania Department of Natural Resources Grant Programs
- Pennsylvania Department of Transportation Multi-Modal Transportation Fund
- Pennsylvania Housing Finance Agency
- Pennsylvania Liquid Fuels Program
- Public Housing Developments
- Section 8 Rental Assistance Program
- Self-Determination Housing Project
- U.S. Department of Agriculture (USDA) Rural Development Single Family Housing Programs
- Weatherization Program

CDBG funds may be considered by the Borough of Berwick as a match source for projects financed with other resources, when a national objective can be met, and match requirements do not preclude use of federal funds.

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

Publicly owned property will likely be utilized for any DV-1 Community Facility or DV-2 Infrastructure projects.

Discussion

With limited CDBG funds available to address the needs identified in the Five-Year Consolidated Plan, the Borough of Berwick will work cooperatively with private, public, and non-profit partners. The Borough of Berwick anticipates that projects funded in FFY 2024 with CDBG funds will require minimal additional matching funds. The Borough could utilize FFY 2024 CDBG funds to reimburse itself for project cost overruns that occur on FFY 2024 projects, if necessary. Other goals identified in the Five-Year Consolidated Plan and not funded with CDBG funds in FFY 2024, will utilize Local General Funds when necessary.

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.	DV-1 Community Facilities	2021	2026	Non-Housing Community Development	Borough- Wide	Community Development Priority	CDBG: 70.08% of CDBG project funds \$170,983	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 10,250 households
2.	HS-2 Housing Stock	2021	2025	Non-Housing Community Development	Borough -Wide	Community Development Priority	CDBG: 29.92% of CDBG project funds; \$73,000	Buildings Demolished: 1 Building
3.	AM-1 Overall Coordination	2021	2025	Administration, Planning, and Management	Borough -Wide	Administration, Planning, and Management Priority	CDBG: 15.8% of the total CDBG allocation; \$45,768	Other: 1 Other

Table 5 – Goals Summary

Goal Descriptions

1.	Goal Name	DV-1 Community Facilities
	Goal Description	Improve the parks, recreational centers, trails, bikeways, and public and community facilities through rehabilitation, new construction, and handicap accessibility improvements.
2.	Goal Name	HS – 2 Housing Stock
	Goal Description	Support efforts to create new units of affordable and/or accessible housing as well as maintain and improve the quality of older homes, including elimination of slum and blighting conditions.
3.	Goal Name	AM-1 Overall Coordination
	Goal Description	Provide program management and oversight for the successful administration of federal, state, and local funded programs, including planning services for special studies, environmental clearance, fair housing, and compliance with all Federal, state, and local laws and regulations.

Table 6 – Goal Descriptions

Projects

AP-35 Projects – 91.220(d)

Introduction

Projects

#	Project Name
1.	Administration
2.	Removal of Blighted Properties Phase V
3.	Jackson Mansion Rehabilitation

Table 7 - Project Information

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

The Borough of Berwick has allocated its CDBG funds for FFY 2024 to principally benefit low- and moderate-income persons.

Through ongoing discussion by members of the Berwick Borough Council, residents, and an examination by SEDA-COG, it has been determined that the best investment of FFY 2024 CDBG funds would be to move forward with the following activities

- Removal of slum and blighting conditions, on a spot basis, has been a CDBG funding priority of the Berwick Borough Council for years due to the roughly forty vacant, condemned structures throughout the municipal limits. This pervasive blight is detrimental to public safety and health for all borough residents.

Berwick Borough has taken a very proactive approach toward code enforcement which has included structural demolitions when property owners have been unresponsive to mandated code repairs. The Borough of Berwick's Code Enforcement Supervisor continues to identify blighted structures which are suitable for demolition.

Berwick Borough will select structures for demolition utilizing CDBG funds based on the borough's demolition policies and procedures. The professional opinion of the Borough of Berwick's Code Enforcement Supervisor, an official condemnation of the structures, accumulation of documentation of the structure's dilapidated state, and the adopted

Residential Anti-Displacement and Relocation Assistance Plan are all necessary for the selection of a structure for demolition.

- Community Development is a high funding priority of Berwick Borough as there is a need to improve the public and community facilities through rehabilitation, new construction, and handicap accessibility improvements.

Berwick Borough identifies The Jackson Mansion as a treasured community facility in need of rehabilitation. The residents of the Borough use this historic building for concerts, local group meetings, social gatherings, and events around the holidays. Public tours are also given as this promotes a sense of community pride and interest in the Berwick area and its history.

The roof of the building is old and needs to be replaced. If the roof is not replaced, the building will be irrevocably damaged. Rehabilitation of the Jackson Mansion is crucial for the building's long-term preservation as a public facility. This project will benefit all residents in Berwick Borough, which is primarily residential and more than 51% are L/M income persons.

AP-38 Project Summary

Project Summary Information

1.	Project Name	Administration
	Target Area	Borough-wide
	Goals Supported	AM-1 Overall Coordination
	Needs Addressed	Administration, Planning, and Management Priority
	Funding	\$45,768.00
	Description	General administrative costs, including staff salaries/benefits, consulting services, Analysis of Impediment Housing Study, preparation of application, annual action plans, Environmental Review Record, CAPERs, advertising, audit, special studies, planning and management.
	Target Date	9/30/2025
	Estimate the number and type of families that will benefit from the proposed	10,250 Residents, 2011-2015 ACS
	Location Description	Borough-wide
	Planned Activities	The project matrix code is 21A - General Program Administration.
2.	Project Name	Jackson Mansion Rehabilitation
	Target Area	Borough-wide
	Goals Supported	DV-1 Community Facilities

	Needs Addressed	Community Development Priority
	Funding	FFY 2024 \$170,983 committed to project
	Description	CDBG funds will be used to rehabilitate the roof of the Jackson Mansion
	Target Date	9/30/2025
	Estimate the number and type of families that will benefit from the proposed activities	10,250 Residents, 2011-2015 ACS
	Location Description	344 N. Market Street, Berwick, PA 18603
	Planned Activities	The national objective is Low/Mod Area Benefit (LMA). The matrix code is 03E, Neighborhood Facilities.
3.	Project Name	Removal of Blighted Structures – Berwick Phase V
	Target Area	Borough Wide
	Goals Supported	HS – 2 Housing Stock
	Needs Addressed	Community Development Priority
	Funding	FFY 2024 \$73,000 allocated funds to be committed to the project as needed
	Description	CDBG Funds have been allocated in programming to remove slum, blight on a spot basis
	Target Date	09/30/2025

Estimate the number and type of families that will benefit from the proposed activities	1 building/structure has been identified by Borough Codes Department. Funding allocations may limit demolitions.
--	---

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

Generally speaking, CDBG expenditures will be made on a borough wide basis.

Compared to other HUD grantees, Berwick Borough is quite small in size, population, and tax base. The Borough only has two census tracts within its borough limits.

Geographic Distribution

Target Area	Percentage of Funds
Borough Wide	100%

Table 8 - Geographic Distribution

Rationale for the priorities for allocating investments geographically

Selection of projects to be financed with CDBG is orchestrated by the Borough of Berwick’s adopted Citizen Participation Plan. Criteria necessary to have a project financed with CDBG includes but is not exclusively limited to the project’s eligibility as a CDBG activity, financial need, and consistency with the FFY 2021-2025 Five-Year Consolidated Plan. Service area of a project is also of great importance, particularly given that at least 70% of CDBG project funds must be expended on low to moderate income benefit activities. The Borough of Berwick has traditionally funded most of its activities based on low to moderate income area benefit. Depending on the service area of a proposed activity, a local income survey effort may be necessary to demonstrate low to moderate income benefit. Otherwise, the following geographic areas are considered predominately low to moderate income based on 2011-2015 ACS data:

- Borough-Wide LMI: 55.2%
- Census Tract, 506 Block Group 2: 74.27%
- Census Tract, 506 Block Group 4: 62.15%
- Census Tract, 506 Block Group 5: 62.92%
- Census Tract, 506 Block Group 4: 70.26%
- Census Tract, 507 Block Group 1: 61.54%
- Census Tract, 507 Block Group 4: 53.95%

Discussion

The geographic locations for the FFY 2024 CDBG activities are as follows:

- Removal of Blighted Structures – Berwick Phase V: Borough-wide (SBS)
- Jackson Mansion Rehabilitation - Borough-wide (LMA)
- Administration – Borough-wide

Affordable Housing

AP-55 Affordable Housing – 91.220(g)

Introduction

One Year Goals for the Number of Households to be Supported	
Homeless	
Non-Homeless	3
Special-Needs	
Total	3

Table 64 - One Year Goals for Affordable Housing by Support Requirement

One Year Goals for the Number of Households Supported Through	
Rental Assistance	
The Production of New Units	
Rehab of Existing Units	3
Acquisition of Existing Units	
Total	3

Table 65 - One Year Goals for Affordable Housing by Support Type

Discussion

The Borough of Berwick uses HOME funds it receives from the Commonwealth of Pennsylvania to do affordable housing projects. The Borough of Berwick rehabilitated three housing units between October 1, 2022, and September 30, 2023.

The Commonwealth opened a new HOME funding application round in August 2023. The Borough of Berwick applied for a HOME grant for \$300,000 to be utilized for existing owner-occupied housing rehabilitation on September 15, 2023.

The Borough was successful in securing a new grant award and it is estimated that four homes

will be rehabilitated during the course of the grant period October 1, 2024 through September 30, 2025.

AP-60 Public Housing – 91.220(h)

Introduction

The Columbia County Housing Authority's Admission and Continued Occupancy Policy requires their agency to regularly monitor each of their units to maintain safe, satisfactory living conditions for its public housing tenants.

To provide superior service, the Columbia County Housing Authority resolves to:

- Administer applicable Federal and state laws and regulations to achieve high ratings in compliance measurement indicators, while maintaining efficiency in program operation to ensure fair and consistent treatment of clients served.
- Provide decent, safe, and sanitary housing, in good repair – in compliance with program uniform physical condition standards – for very low- and low-income families.
- Achieve a healthy mix of incomes in its public housing developments by attracting and retaining higher income families, and by working toward deconcentration of poverty goals.
- Encourage self-sufficiency of participant families and assist in the expansion of family opportunities which address educational, socio-economic, recreational, and other human services needs.
- Promote fair housing and the opportunity for very low- and low-income families of all races, ethnicities, national origins, religions, ethnic backgrounds, and with all types of disabilities, to participate in the public housing program and its services.
- Create positive public awareness and expand the level of family and community support in accomplishing the PHA's mission.
- Attain and maintain a high level of standards and professionalism in day-to-day management of all program components. Administer an efficient, high-performing agency through continuous improvement of the CCHA's support systems and commitment to employees and their development.
- CCHA will make every effort to keep residents informed of program rules and regulations, and to advise participants of how the program rules affect them.

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

Based on consultation with Matt Hess, Executive Director of the Columbia County Housing & Redevelopment Authorities, employees are currently reviewing HUD regulations to determine what public housing needs the authorities need to prioritize in the near future.

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

The Columbia County Housing Authority does not administer a Public Housing Homeownership Program or a Section 8 Housing Choice Voucher Homeownership Program. As a result, there has been limited concerted effort promoting public housing residents to become more involved in management. These are voluntary programs that public housing authorities can choose to establish by notifying HUD and the public in the Annual Agency Plan and by creating administrative guidelines that meet HUD requirements. HUD approval of these local option programs does not increase funding to the public housing authority.

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

Not applicable.

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

Introduction

The Borough of Berwick is part of the Eastern Pennsylvania Continuum of Care and the Central Valley Regional Homeless Advisory Board which includes 11 counties. Most people experiencing homelessness are sheltered and are not considered to be homeless based on the HUD definition. There is a perception that homelessness does not exist in the Borough of Berwick and further if a person is homeless, it is their own fault due to drugs, alcohol, etc. As noted by the National Low- Income Housing Coalition Executive Director Sheila Crowley in the Daily Item, “rural homelessness is undercounted...Rural people could be living in a car, living in a trailer, in hunting shacks.” People experiencing homelessness in rural communities also have the challenge of being distanced from services.

Nearly one in five households in the Borough of Berwick is ‘doubled up’ with multiple families or unrelated individuals living in the home.

- Census Tract 506 18.5%
- Census Tract 507 19.7%
- Bloomsburg-Berwick MSA 12.5%
- Pennsylvania 10.2%
- United States 11.1%

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

Based on the recommendations of the FFY 2020 - 2024 Analysis of Impediments Fair Housing Study, the Borough of Berwick will assess the need for additional emergency or transitional shelter, rapid rehousing, and homelessness prevention services in the borough. Key partners to this effort included the Continuum of Care, Community Strategies Group, SEDA-Council of Governments, and the Borough of Berwick.

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

The Borough of Berwick's Citizen Participation Plan encourages consultation with local homelessness organizations during the development of various CDBG planning efforts. These organizations include:

- Beyond Violence, Inc.
 - Provides shelter for women and children that are victims of domestic violence.
 - Located in the Borough of Berwick.

- Columbia/Montour Transitional Housing and Care Center
 - Provides emergency shelter and transitional housing.
 - Located at the Gatehouse facility in the Borough of Danville.
 - This is a nine-mile drive between Bloomsburg and Danville and a twenty-two-mile drive from Berwick to Danville.

- Eastern Pennsylvania Continuum of Care
 - HUD program is designed to promote regionwide commitment to the goal of ending homelessness.

- The Women's Center, Inc.
 - Provides shelter for women and children that are victims of domestic violence.
 - Located in the Town of Bloomsburg.

Addressing the emergency shelter and transitional housing needs of homeless persons

The Borough of Berwick's FFY 2020 - 2024 Analysis of Impediments Fair Housing Study provides the following strategies to address this housing need:

- Assess the need to provide additional emergency or transitional shelter, rapid rehousing, and homelessness prevention services in the Borough and the region.
 - Key Partners: Continuum of Care, Community Strategies Group, SEDA-Council of Governments, The Borough of Berwick

- Submit a regional competitive ESG (Emergency Solutions Grant) application to DCED to fund the needs and solutions identified in the assessment.
 - Key Partners: Continuum of Care, SEDA-Council of Governments

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

The Borough of Berwick supports the efforts of local partner agencies to address the need for rapid rehousing.

CCHA's Homelessness Prevention and Rapid Re-Housing Program's aim is to provide financial assistance and services to minimize and prevent individuals and families from becoming homeless.

Beyond Violence in Berwick and the Women's Center of Columbia/Montour Counties in Bloomsburg both have counseling and programs to assist their clients with finding more permanent housing opportunities. The Women's Center of Columbia/Montour Counties holds

focus groups on this topic and other related topics such as healthcare, budgeting, and parenting. The Gatehouse also lists “securing affordable housing” as one of their shelter’s tenant goals for their residents.

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.

A variety of programs are established in Columbia County to help low-income individuals and families avoid becoming homeless. The Columbia County United Way and Berwick United Way, the Columbia County Family Center, Beyond Violence, and the Women’s Center of Columbia/Montour Counties offer some form of budgeting or financial literacy class. The goals of these classes are for clients to learn how to earn money, manage it, and potentially invest it, and/or donate it to organizations or causes to help others. Successful money management is a critical skill for clients to develop to find and maintain housing which is affordable to their budget.

Numerous programs are also available for individuals and families recently discharged from a publicly funded institution or system of care. CMSU has established a Mental Health/Substance Abuse Housing Plan as required by the Pennsylvania Department of Public Welfare’s Office of Mental Health and Substance Abuse Services (OMHSAS). This plan describes the status of and any modification to the county’s efforts to enable adults and transition age individuals with serious mental illness to live, work, learn, and participate fully in their communities.

The county also has an established reentry program known as the Justice House program for prisoners who have been released back into the community. For individuals about to be released from a medical institution, hospitals must have written discharge policies that include evaluation of a patient’s capacity for self-care and possibility of being cared for in “the environment from which he/she entered the hospital.” The actual discharge varies with the individual being discharged, their primary and behavioral health needs, and resources and supports available. While planners try to send individuals home or to family, sometimes they are referred to a nursing home, rehab hospital or as last resort, non-HUD funded shelter.

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

Introduction:

The Borough of Berwick’s FFY 2020-2024 Analysis of Impediments to Fair Housing Study provides the following narrative concerning municipal laws and practices negatively impacting affordable housing:

Most of the Borough is zoned R-1 and R-2 which only permits single- and two-family dwelling units. The few places that allow multifamily dwelling and townhouses are smaller areas and concentrated; however, they are scattered throughout the Borough.

There is vacant land in the northwest corner of the Borough. It is mostly zoned R-1, Low Density Residential District, but there are some R-2, Medium Density Residential and R-3, High Density Residential sections. Berwick could consider re-zoning the undeveloped R-1 land to R-3 to allow for a greater variety of housing options including single-family, two-family, multifamily and townhouse dwellings. The dimensions for lot area, lot width, front yard setback, rear yard setback, side yard setback, max lot coverage and building height are not overly burdensome in any zoning district. In the zoning ordinance, mobile homes are defined as single family dwelling units, and therefore can be located anywhere single-family dwelling units are permitted. This allows for a low-income housing option in residential zoning districts.

The Borough’s zoning ordinance defines a family as “one or more person related by blood, marriage or legal adoption or a group not more than four (4) persons occupying a dwelling unit and living together as a single nonprofit housekeeping unit. Foster children placed into the care and custody of a family shall be deemed to be a member of the family.” This definition limits the definition of family to related individuals, foster children, or to residents of a group home with up to four people. The definition of family should be revised to make it clear that unrelated individuals are permitted to share the same home. The zoning ordinance has a “group care facility” type. A group residence is defined as “a dwelling unit which is shared under congregate living arrangements by more than four persons, who are residents of the dwelling unit by virtue of their need to receive supervised services limited to health, social and/or rehabilitative services...” Group care facilities are permitted by special exception in the R-2 and R-3 zoning districts only. Group care facilities should be permitted by right in any single-family dwelling unit, per the Fair Housing Act.

The definition of disruptive conduct does not exclude victims of domestic violence. While this is not required by law, such a definition may discourage victims from seeking assistance when they are in danger. Currently, the Landlord Registration Ordinance states that a license can be revoked after two violations involving the same occupant. This is inordinately restrictive as

most municipalities base this on three violations

Economically, Berwick Borough has rebounded from the disastrous conditions of Covid-19. At peak, unemployment surpassed 17%; while currently mirroring that of Pennsylvania and surrounding regions below 5%. Inflationary pressures within CPI and PPI place inordinate financial balancing acts on residents, as do fluctuating interest rates, directly affecting consumer spending, investment, homeownership, long and short-term investments. Such instability has limited mitigating controls by local municipal bodies. Effects of national and/or Commonwealth economic trends directly cause harm to resident base, limiting available cash flows required for property management, upkeep, or purchase. Mirroring, the Borough, commercial and industrial employment base, would similarly face decisions of growth, expansion, re-investment of plant, capital, equipment, and training. Limited control of macro-economic forces, thus limit Borough investment, business investment, and trickle-down resident investment.

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

Hailstone Economics, included recommendations within the Berwick Borough Analysis of Impediments recognizing barriers to affordable housing being affected through public policy. Activities and actions recently completed, anticipated or on-going by Berwick Borough during FFY 2024 includes:

1. Re-zoning sections of Borough vacant land from R-1 to R-3. Borough Administration recognizes potential land use and development in the northwest section.
 - a. Council voted to advertise an update to the zoning ordinance that will change the entire section to C-1, allowing for high density residential (same as R-3), while also allowing for neighborhood commercial. Voting for final passage is anticipated in August 2024.
 - b. Attraction of potential investors, likely will be affected through macro-economic conditions, largely beyond control of borough officials
 - c. Actions and updates to zoning will further incorporate zoning board, solicitor opinion and council action culminating sometime during FFY 2024

2. Mixed use occupancy for residential occupancy in C-1, C-2 and C-3 districts has had council discussion. Concerns and questions of permitting, licensing, parking, egress have lacked conclusion.
 - a. As part of the same zoning update referenced above, a change will allow high-density residential C-2 zones. High-density is already allowed in C-1. The C-3 district is the

downtown commercial, which the Council hopes to further address in an upcoming second phase of updates.

- b. Macro and micro economic conditions and forces may facilitate investment incentives thus generating new housing locations, rebirth of commercial districts, increased tax and revenue base, triggered by increased population densities
3. Creating an I-1 Overlay District in the I-1 Zoning District aims at protecting existing dwelling units and fostering additional development of housing stock. Existing properties had been granted exclusions, prior to both zoning and current Borough Administration. Overlay districts proposed in 'R-1' recognition, but further provide scope of 'urban' development via gentrification, loft living or conversion habitats.
 - a. Borough council began reviews during an umbrella review of re-zoning borough-wide during FFY 2024. Creating an Overlay District has been identified as a potential priority for the second phase of updates.
 - b. Incentivization for such modern trend dwelling units would foster numerous positive benefits for Borough officials
 - i. Housing stock increases
 - ii. Population density increase
 - iii. Tax base growth
 - iv. Commercial shop-local profits
 - v. Employment base increases
 - vi. Mitigation of spot slum/blight locations
 - vii. Retention of population base (younger under 40 populations)
4. Adoption of Fair Housing and AFFH language within Borough ordinances to reflect updated definitions of family, familial size and extended family necessities as well as disturbances
 - a. Integration and adoption of such ordinance language has been planned for FFY 2024 as included within an overall ordinance adoption package
5. Berwick Borough Council has begun discussions of landlord ordinances, updating language and policies & procedures from its origination in 1972. Language relevant to Landlord-Tenant Ordinance would identify issues of timeliness, responsibilities, maintenance, licensing, and inspection which have foundations within affordable housing. Action likely to be concluded during FFY 2024.

6. Berwick Borough updated its website, adding links to and for SEDA-COG Fair Housing Educational pages and Weatherization during FFY 2023. In June 2024, the Borough updated its website to a mobile-friendly version, allowing easier access to this information for residents using mobile devices as a primary means of accessing the website.
7. Berwick Borough Codes staff will continue review of code enforcement, codes and permitting. Activities will include distribution of SEDA-COG Fair Housing Welcome Back: Toolkit, as means to disseminate information of Fair Housing practices, complaint processes, protected class topics, financial awareness, homeownership, and biases.
8. For FFY 2024, SEDA-COG's Community Development and Housing Rehabilitation department's annual project proposed to address the Fair Housing goal of increasing Public Awareness of Fair Housing Rights. The Financial Awareness/Home Ownership Social Media project reached out to Fair Housing institutions.. Material presentations were uploaded for broadcast on SEDA-COG's Facebook, LinkedIn, X (Twitter), and Instagram accounts during the month of April. A letter was sent to all community partners encouraging them to share on their own social media accounts.
9. Berwick Borough, pending adoption of Landlord-Tenant Ordinance revision, will outreach to out-of-town property owners both establishing relationships among regional social service organizations, landlord and tenants to improve housing stock, property values, and living accommodations.

Berwick Borough's Analysis of Impediments to Fair Housing Study (AI Plan) represents the Borough's commitment to affirmatively furthering fair housing. The Affirmatively Furthering Fair Housing (AFFH) obligation requires federal agencies and federal funding recipients to take proactive steps to address long-standing patterns of segregation, discrimination, and disinvestment. Implementation of the plan is just as important as the plan itself. In addition to annually re-adopting a Fair Housing Resolution, Berwick Borough, in coordination with SEDA-COG and Columbia County Human Service Coalition (CCHSC), will share information to regional Centers for Independent Living (CIL) regarding upcoming projects, programs, and outreach facilitating Fair Housing and AFFH initiatives. On-going collaborative outreach by Berwick Borough, CCHSC, SEDA-COG and CIL's will enable consistent communication of Fair Housing rules, regulations, and updates to protected classes within the Borough.

AP-85 Other Actions – 91.220(k)

Introduction:

The Borough of Berwick has developed the following actions which address the obstacles of meeting underserved needs, foster affordable housing, reduce lead-based paint hazards, reduce the number of families living in poverty, develop institutional structures, and enhancing coordination between public and private housing, and social service agencies.

Actions planned to address obstacles to meeting underserved needs

Despite efforts made by the Borough of Berwick and social service providers, several significant obstacles remain to meet underserved needs. With funding resources being scarce, funding becomes the greatest obstacle for the Borough of Berwick to meet its underserved needs. Insufficient funding lessens the ability to fund many worthwhile public service programs, activities, and agencies. The Borough of Berwick, through its planning efforts, will use its limited resources to address its greatest needs and improve the quality of life for its residents. The following obstacles need to be overcome to meet underserved needs:

- Lack of decent, safe, sound, and affordable owner and renter housing
- High cost of rehabilitation work
- Aging-in-place population who need accessibility improvements
- The need for rehabilitation of the Borough of Berwick’s aging housing stock
- Vacant and abandoned properties
- The unemployment rate and loss of household income resulting from the COVID-19 pandemic
- Low wages in the service and retail sector job market

Actions planned to foster and maintain affordable housing

Housing Priority - (High Priority)

There is a need to improve the quality of the housing stock in the Borough of Berwick, and to

increase the supply of affordable, decent, safe, sound, and accessible housing for homeowners, renters, and homebuyers.

- **HS-1: Fair Housing** – Support education, enforcement/reporting, and/or evaluation/study of Fair Housing rights and other housing related topics relevant to the public.
- **HS-2: Housing Stock** - Support efforts to create new units of affordable and/or accessible housing as well as maintain and improve the quality of older homes, including elimination of slum and blighting conditions.

Assignment of Priority Discussion:

High Priority - Activities are assigned a high priority if the Borough of Berwick will likely utilize CDBG funds to finance activities during the Five-Year Consolidated Plan period.

Low Priority - Activities are assigned a low priority if the activity may not be funded by the Borough of Berwick during the Five-Year Consolidated Plan period. The Borough of Berwick may support applications for other funding if those activities are consistent with the needs identified in the Five-Year Consolidated Plan.

Actions planned to reduce lead-based paint hazards

For the CDBG and HOME Program rehab programs, all contracts entered after January 10, 2002, must comply with the Lead Based Paint Regulations dated September 15, 1999, for housing rehabilitation. These regulations include the requirement that all work performed on lead-containing surfaces must conform to lead-safe practices and be completed by workers who are either supervised by an EPA-certified abatement supervisor, or workers trained in lead-safe work practices. If abatement options are specified in the work writeup, then the contractor must hire an EPA-certified and state licensed abatement contractor and submit proof of the current state license.

The following requirements apply to federally funded housing rehabilitation:

Rehab where the costs range from \$1,000 to \$4,999:

- Provisions of the Protect Your Family from Lead in Your Home Pamphlet found at

www.epa.gov/lead

- Paint testing
- Repair surfaces disturbed during rehabilitation
- Use lead safe work practices
- Clearance of the work site

Rehab where the costs range from \$5,000 to \$24,999:

- Provisions of the Protect Your Family from Lead in Your Home Pamphlet found at www.epa.gov/lead
- Paint testing and risk assessment
- Interim controls
- Use lead safe work practices
- Clearance of the unit

Rehab where the work exceeds \$25,000:

- Provisions of the Protect Your Family from Lead in Your Home Pamphlet found at www.epa.gov/lead
- Paint testing and risk assessment
- Abatement (interim controls on exterior surfaces not disturbed by rehab)
- Use lead safe work practices
- Clearance of the unit

Any housing rehabilitation projects undertaken by the Borough of Berwick, utilize DCED's Housing Rehabilitation Guidebook dated November 2020. This guidebook was specifically created for projects financed with CDBG and/or HOME funds. The actions listed above were

obtained from this literature.

Actions planned to reduce the number of poverty-level families

Preservation of local jobs and businesses has been as important as ever for the Borough of Berwick, mitigating the increase in poverty-level families. To encourage a local economic recovery, economic empowerment of the Borough of Berwick's residents also needs to occur. These efforts ought to include but are not limited to Borough economic incentives, coordinated planning for commercial district growth and success, social media support of borough-based businesses, Council support of initiatives fostering community aesthetics and promotion of family values reflective of the close-knit community.

Additional economic development partnerships within the region would well include attraction of industrial / manufacturing base, marketing of the borough's location and proximity to major SMSA's and population hubs, emphasizing both work ethics and transportation links within the northeast megalopolis, enhancing new employment opportunities, supporting employee education and job training and business technical assistance efforts.

The resources and opportunities that the Borough of Berwick has for minimizing the number of families with incomes below the poverty line are limited. Since poverty is a function of income, its effect on housing opportunity and choice is apparent. Conversely, without adequate, stable housing, alleviating poverty is more difficult.

More direct efforts to alleviate poverty by combining case management, social services, job training, and housing assistance are more common through collaboration with the Columbia County Human Service Coalition. Additionally, the Columbia Montour Chamber of Commerce also has developed relevant programming to include:

1. Facilitation of regular discussions between employers and educators to improve the teaching of real workplace skills; and
2. Foundational skills for unemployed and underemployed individuals with the potential expansion to include people on parole and/or leaving prison; and
3. A partnership with Bloomsburg University to develop team leadership and basic management skills in existing employees.

Several structural barriers to poverty are addressed through different local policies. For example, the Borough of Berwick has adopted a Section 3 Action Plan which requires the employment of Section 3 persons on construction contracts when possible. Admittedly, contractors often already have the workforce necessary to complete a construction project.

The goals of the FFY 2021-2025 Consolidated Plan concerning economic development include:

Community and Economic Development Priority - (High Priority)

There is a need to improve the public and community facilities, infrastructure, employment, and the quality of life in the Borough of Berwick.

- **DV-1 Community Facilities** - Improve the parks, recreational centers, trails, bikeways, and public and community facilities through rehabilitation, new construction, and handicap accessibility improvements.
- **DV-2 Infrastructure** - Improve infrastructure through rehabilitation, reconstruction, and new construction of streets, sidewalks, ADA curb cut ramps, sewer, water, storm water management, flood protection, bridges, green infrastructure, etc.
- **DV-3 Employment** - Support and encourage job creation, job retention, and job training opportunities as well as entrepreneurship and small business development.

Assignment of Priority Discussion:

High Priority - Activities are assigned a high priority if the Borough of Berwick will likely utilize CDBG funds to finance activities during the Five-Year Consolidated Plan period.

Low Priority - Activities are assigned a low priority if the activity may not be funded by the Borough of Berwick during the Five-Year Consolidated Plan period. The Borough of Berwick may support applications for other funding if those activities are consistent with the needs identified

in the Five-Year Consolidated Plan.

Actions planned to develop institutional structure

The Borough of Berwick and SEDA-COG will coordinate activities amongst public and private agencies, and other organizations that serve the borough. Due to the relatively small population of the Borough of Berwick, many public and private agencies provide services on either a county or multi-county level. As a result of this administrative structure, the efforts to implement the strategies produced from this Five-Year Consolidated Plan will require greater cooperation across Columbia County.

In order to streamline efforts and promote greater local cooperation, the Borough of Berwick will continue to collaborate with the Columbia County Human Service Coalition. This will facilitate and coordinate the linkages between these public/private partnerships, develop new partnership opportunities, and ensure that the goals and objectives of the Five-Year Consolidated Plan will be addressed by more than one agency. Columbia County Human Services Coalition (CCHSC) meetings are held centrally to Columbia County on a monthly basis.

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

Expanding public transportation options could greatly facilitate coordination between public and private housing and social service agencies.

At a planning level, the SEDA-COG Metropolitan Planning Organization (MPO) develops and maintains a Coordinated Public Transit-Human Services Transportation Plan for Clinton, Columbia, Juniata, Mifflin, Montour, Northumberland, Snyder, and Union counties. The Coordinated Plan ensures that area transit operators can apply for and be eligible for funding programs. The 2019 Plan covers a variety of goals, objectives, trends, and projects that were shaped by the Columbia County Housing Authority and several other human service agencies across the region. The 2019 Plan is being updated in 2024 and should be finalized before October.

The Susquehanna Valley United Way, the United Way of Columbia and Montour County, the Greater Susquehanna Valley Chamber of Commerce, River Valley Transit, rabbittransit, Bucknell University, SEDA-COG, and other partners previously pursued a \$300,000 fixed-route pilot transit service focused on the US Routes 11 & 15 corridors (including from Bloomsburg to Berwick) to be funded by the Pennsylvania Department of Transportation. Currently, these

efforts have been tabled due to funding and operational issues, although other regional transit solutions and discussions have been ongoing.

Since 2022, rabbittransit has been operating a successful micro transit pilot service (referred to as the Stop Hopper) that currently covers three zones in the SEDA-COG MPO region, including a Danville to Bloomsburg zone. Stop Hopper is an on-demand, curb-to-curb shuttle service with ADA-accessible vehicles that allows riders to use a smartphone app to arrange trips within a geo-fenced service area from Monday-Friday, 6:30 AM-6:30 PM. During 2023, there were nearly 9,700 Stop Hopper trips in the Danville to Bloomsburg zone. Apartment complexes and homeless shelters are regularly served within this zone. Recent surveying showed that most trip purposes within this zone were for medical, employment, and shopping purposes; also, 69% of the survey participants had household incomes less than \$25,000 annually and 33% had no other means of transportation. An expansion of the Danville to Bloomsburg zone is planned to cover Berwick. More information about the Stop Hopper service can be found here:

<https://www.rabbittransit.org/services/stophopper/>

Discussion:

The Borough of Berwick will continue to observe the community and economic development challenges and opportunities that the residents of the community face. Although the Five-Year Consolidated Plan study effort has been completed, the baseline goals established toward improving the housing and community and economic development needs of the Borough of Berwick will be modified, as necessary.

Otherwise, this current Consolidated Plan will continue to serve as a guide for allocating CDBG funds over the next five years and to provide direction to stakeholder organizations to address the housing and community and economic development needs.

Program Specific Requirements

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

Introduction:

The Borough of Berwick receives an annual allocation of CDBG funds. Since the Borough of Berwick receives this Federal allocation, the questions below have been completed, as they are applicable. The Borough of Berwick will use 70.08% of FFY 2024 CDBG funds toward the benefit of low- and moderate-income individuals.

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	70.08%

persons of low and moderate income. Specify the years covered that include this Annual Action Plan.	
---	--

Discussion:

The Borough of Berwick is allocating 70.08% of the FFY 2024 annual allocation minus administration to LMI activities. The Borough of Berwick wishes to be evaluated over a three-year period (FFY 2022-2024) to determine that a minimum overall benefit of 70% of CDBG funds is used to benefit persons of low and moderate income.

SIGNATURE PAGE

Appendix: