

Executive Summary

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

1. Introduction

As a CDBG entitlement community, the City of Palm Coast is required to submit an Annual Action Plan to direct use of CDBG funds. FFY 2020 is the fourth year of the City's 5-year Consolidated Action Plan (FFY 2017-2021). CDBG funding has previously been programmed for infrastructure improvements to qualified low-moderate income neighborhoods, financial assistance program for home repair for low-moderate income households, public service activities, as well as planning and administration activities. The City intends to continue with activities within one of the categories named above in FFY 2020.

The City serves as the lead agency for administering and implementing projects and programs using CDBG funds. The City has an Interlocal Agreement (ILA) with Flagler County for the administration and implementation of a Joint Housing Program. The ILA has enabled the City and County to partner on the administration of projects using funds from the State Housing Initiative Partnership (SHIP), and in previous years; the Neighborhood Stabilization Program (NSP), and CDBG Small Cities program.

To meet the statutory program goals of decent housing, a suitable living environment, and expanded economic opportunities to benefit low-moderate income persons and households, the City will continue to rely on the objectives, policies, and actions identified in various City documents such as the City Budget, City Capital Improvements Plan (CIP), 2035 Comprehensive Plan, the Recreation and Parks Facilities Master Plan, the Pedestrian and Bicycle Facilities Master Plan, and the City's Economic Development Plan, Prosperity 2021. Additionally, the City consults with various social service agencies including Flagler County Social Service Department, the Volusia/Flagler Continuum of Care and other non-profit organizations on public service needs as well as data for analysis.

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.

To meet the three goals of providing decent housing, providing a suitable living environment, and expanding economic opportunity; the City developed the following objectives:

Goal 1: Provide Decent Housing:

- **Encourage Home Ownership and Reinvestment** by providing financial assistance programs for home repairs to retain the affordable housing stock. City will also identify opportunities to expand housing activities without duplicating services provided by other entities. Activities to be considered could include first time home buyer programs.

Goal 2: Sustainable Living Environment:

- **Invest in Capital Projects** that improve the safety and livability of neighborhoods.
- **Expand availability and access** to public services.

Goal 3: For Expanded Economic Opportunities:

- **Identify economic activities** which may be assisted by CDBG funds.

Goal 4: Address urgent needs:

As a result of a declared emergency, identify potential use of CDBG funds to assist eligible persons and activities.

3. Evaluation of past performance

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

The City has received approximately \$3.5 million in CDBG entitlement funds since 2012. These funds have been used to assist students to attend the City's summer camp, provide financial assistance to qualified home owners to repair and bring their homes to meet existing code requirements, and finally, to construct approximately 8 miles of multi-use paths to serve a low-moderate income neighborhood. The City seeks to continue these activities in an effort to assist low-moderate income households/families as well as providing improvements to low-moderate income neighborhoods.

4. Summary of Citizen Participation Process and consultation process

Summary from citizen participation section of plan.

To complete the Annual Action Plan (AAP), the City consulted with various local and regional social service and housing advocate agencies. The City further hosted public workshop/public hearings to discuss housing and community development needs. In addition to non-profit agencies, the City continuously coordinates with the adjacent municipalities as well as regional planning agencies such as the Northeast Florida Regional Council, and the River to Sea Transportation Planning Organization.

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.

A summary of public comments opportunities and any comments received are provided as an attachment to this Annual Action Plan.

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

A summary of public comments opportunities and any comments received are provided as an attachment to this Annual Action Plan.

7. Summary

A summary of public comments opportunities and any comments received are provided as an attachment to this Annual Action Plan.

DRAFT - For Public Comment July 2, 2020 to July 31, 2020

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 | | Community Development Department |

Table 1 – Responsible Agencies

Narrative (optional)

The City of Palm Coast Community Development Department is the responsible entity for administering the CDBG program. Staff works with other City departments (Finance, Central Services), non-profit organizations, Flagler County to carry out the goals of the Consolidated Plan. As an example, an infrastructure activity may require the coordination of various departments to implement the most cost-efficient project. One department (Stormwater & Engineering) may design and work on the necessary permitting for the project, while the Public Works Dept. does the actual construction. The capacity to coordinate various phases using existing City staff allows the available CDBG funds to be stretched, in essence, the City is providing an in-kind match to the implementation of CDBG activities.

Consolidated Plan Public Contact Information

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DRAFT - For Public Comment July 2, 2020 to July 31, 2020

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

1. Introduction

The CDBG program mandates the consultation of grant funding recipients with other public and private agencies, state or local social service agencies (for homeless services, child welfare services), adjacent governments, local Continuum of Care (CoC), and Public Housing authorities.

During the course of the administration and implementation of CDBG funded activities, the City continuously coordinates with these various agencies. The City reached out to social service and housing assistance service providers (including the Public Housing Authority) as part of the completion of the Analysis of Impediments to Fair Housing (AI). During the completion of the current Consolidated Action Plan (CAP) as well as during the completion of the Annual Action Plan, the City provided notice of public workshops and meetings to discuss the use of CDBG funds.

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 City works consistently with the Flagler County SHIP program, the City and County have an Interlocal Agreement that allows for the coordination of services and information between the two entities. This coordination assists to minimize the duplication of services. Additionally, the City annually works with Mid-Florida Housing Partnership, the local Board of Realtors, local financial institutions, and the County to host the Annual Flagler County Housing Fair. This annual housing fair targets all families and provides information on available housing assistance programs in the County as well as information on opportunities for home-ownership.

As part of the completion of the CAP, mental health, and service agencies are invited to attend the public workshops as well as to provide comments on the drafts of the CAP. The City continuously receives feedback and comment on activities which may be funded through the CDBG program.

Describe coordination with the Continuum of Care and efforts to address the needs of homeless persons (particularly chronically homeless individuals and families, families with children, veterans, and unaccompanied youth) and persons at risk of homelessness.

The Volusia/Flagler County Coalition for the Homeless (VFCCH) is the lead agency for the Continuum of Care (CoC) which serves Flagler County. The CoC is responsible for conducting the annual count of people experiencing homelessness, identifying the gaps in available housing and services to homeless subpopulations, and strategically planning and organizing the expansion of housing and supportive

services to meet the needs. As the lead agency to end homelessness in the Volusia/Flagler area, the Coalition is committed to implementing the following strategies:

- Provide fully transparent leadership in planning, policy making and implementation our community's response system to homelessness.
- Administer program monitoring, evaluation, and performance measurement with professionalism and neutrality
- Be guided by the mission of ending homelessness in its coordination and utilization of public and private resources
- Provide a highly skilled and experienced professional staff to implement and coordinate the CoC Plan.

The City in reviewing the 2015/16 CoC Strategic Action Plan recognizes the following objectives and actions identified in the plan.

Volusia-Flagler Continuum of Care (VFCoC) Objective 1: INCREASE RATE OF PEOPLE MOVING INTO PERMANENT HOUSING/ENDING HOMELESSNESS

VFCoC Objective 2: *RAPID-REHOUSING /FAMILIES W/ CHILDREN AND INDIVIDUALS*

VFCoC Objective 3: INCREASE ACCESS TO MAINSTREAM BENEFITS & HOMELESS PREVENTION SERVICES

VFCoC Objective 4: *ENHANCE EMERGENCY SHELTER TRANSITIONAL Housing / ACCESS TO FAMILIES AND INDIVIDUALS*

VFCoC Objective 5: ENHANCE COORDINATED ENTRY SYSTEM

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 City of Palm Coast does not receive ESG funds. The City of Palm Coast receives a limited amount of funding through the CDBG program. The City of Palm Coast recognizes the VFCoC as the lead agency in determining how to allocate ESG funds and will provide support and coordinate efforts as necessary.

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

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Table 2 – Agencies, groups, organizations who participated

| | | |
|---|--|---|
| 1 | Agency/Group/Organization | City of Palm Coast |
| | Agency/Group/Organization Type | Other government - Local |
| | What section of the Plan was addressed by Consultation? | Housing Need Assessment Economic Development Infrastructure Needs |
| | Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination? | City of Palm Coast serves the as the lead agency for the planning and administration of the CDBG program. The Community Development Department serves as the lead but consults with other departments such as Recreation and Parks, Utilities, & Construction Management & Engineering Services to identify projects and needs that may be funded with CDBG funds. |
| 2 | Agency/Group/Organization | Northeast Florida Regional Council |
| | Agency/Group/Organization Type | Regional organization |
| | What section of the Plan was addressed by Consultation? | Economic Development |
| | Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination? | Northeast Florida Regional Council (NEFRC) completed the Comprehensive Economic Development Strategy (CEDS) for the 7 county region in Northeast Florida including Flagler County. Additionally, the NEFRC assisted the City in the completion of the Analysis of Impediments to Fair Housing (AI) and provided valuable input into ensuring that the analysis was pertinent to the needs of the City in determining housing needs and fair housing issues. |
| 3 | Agency/Group/Organization | FLAGLER COUNTY |
| | Agency/Group/Organization Type | Other government - County |
| | What section of the Plan was addressed by Consultation? | Housing Need Assessment |

| | | |
|---|--|--|
| | Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination? | The City coordinated with various departments of Flagler County government to gather data for the completion of the Consolidated Action Plan. Specifically, the Flagler County Social Service Department provided input during the completion of the Analysis of Impediments to Fair Housing process. The input was valuable in identifying needs of their clients who are mainly the elderly or veterans. Additionally, the City of Palm Coast and Flagler County have an Interlocal Agreement to provide a Joint Housing Program. Flagler County as the administrator of the SHIP program is consulted to ensure that there is minimal duplication of programs and services between the City and the County. |
| 4 | Agency/Group/Organization | MID-FLORIDA HOUSING PARTNERSHIP |
| | Agency/Group/Organization Type | Housing Service-Fair Housing |
| | What section of the Plan was addressed by Consultation? | Housing Need Assessment |
| | Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination? | The City is a partner with Mid-Florida in providing an annual Housing Fair. The Fair provides information on housing opportunities and housing programs available in Flagler County. |
| 5 | Agency/Group/Organization | VOLUSIA FLAGLER HOMELESS COALITION |
| | Agency/Group/Organization Type | Services-homeless |
| | What section of the Plan was addressed by Consultation? | Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Homelessness Strategy |

| | |
|---|---|
| <p>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</p> | <p>The Volusia/Flagler County Coalition for the Homeless (VFCCH) is the lead agency for the Continuum of Care which covers Flagler County. Data and documents from the VFCCH were used in the completion of the Consolidated Action Plan.</p> |
|---|---|

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

The City coordinated with a wide range of agencies in the completion of this CAP. Comments and consultation from all agencies were welcomed and considered during the 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 | Volusia-Flagler County Coalition for the Homeless | The strategic plan incorporates the goals of the Coalition's Strategic Action Plan. |

Table 3 – Other local / regional / federal planning efforts

Narrative (optional)

The City of Palm Coast coordinates with a number of public entities in the implementation of the Consolidated Plan. For housing activities, the City will coordinate with Flagler County (as the SHIP program coordinator and social service provider) on intake and strategies to avoid duplication of services. In addition to housing activities, the City provides notice of upcoming infrastructure projects, if the project is adjacent to a neighboring local government.

During the course of implementation of the Consolidated Plan, the City coordinated with various state agencies to ensure a comprehensive environmental review that meets federal regulations. These state agencies depending on the activity have included: the Department of Environmental Protection, the Division of Historic Resources, the St. Johns River Water Management District, and the Department of Transportation.

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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**

Consistent with CDBG regulations and the City’s Citizen Participation Plan, the City hosted a public workshop and two public hearings on the Annual Action Plan. These public hearings were held on July 2, 2020, with the Citizens Advisory Task Force, and the City Council on August 4, 2020.

Notice for the public meetings were published in the Daytona Beach News Tribune. The notices were also posted on the City’s website.

The draft FFY 2020 Action Plan was published for a 30-day comment period from July 2, 2020 to July 31, 2020. The plan was also posted on the City’s website and was available by hard copy at City Hall.

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 | Non-targeted/broad community | Citizens Advisory Task Force Public Meeting. Attendance were from members of the Task Force and the Flagler County SHIP Administrator. | <i>To be completed after public comment period.</i> | <i>To be completed after public comment period.</i> | |

| 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 | Non-targeted/broad community | Citizens Advisory Task Force Public Hearing. Attendance were from members of the Task Force and the Flagler County SHIP Administrator. | <i>To be completed after public comment period.</i> | <i>To be completed after public comment period.</i> | |
| 3 | Public Hearing | Non-targeted/broad community | City Council public hearing. Attendance were from a variety of residents who were at meeting for other items. | <i>To be completed after public comment period.</i> | <i>To be completed after public comment period.</i> | |

Table 4 – Citizen Participation Outreach

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Expected Resources

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

Introduction

The City of Palm Coast's allocation for FFY 2019 is \$508,387 along with program income of \$30,000. If the City receives additional (likely from the sale of a home that has received CDBG assistance), the City will use the funds for housing activities. The City will anticipate receiving approximately the same amount of funds per year for the remainder of the Consolidated Plan Years (FFY 2021).

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 | 508,387 | 30,000 | 0 | 538,387 | 500,000 | |

Table 5 - Expected Resources – Priority Table

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

The CDBG program does not require a match from non-federal sources. Historically, the City has used in-house staff to provide administrative and planning functions for the CDBG program. In previous years, staff time was not charged to the CDBG program, budget constraints in the upcoming year may require a certain amount of staff time dedicated to CDBG activities to be paid from CDBG funds.

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

Other than the use of public right-of-way for the construction of the Seminole Woods Neighborhood Multi-use Path (now complete), the City does not anticipate using publicly owned land or property to address needs identified in the plan.

Discussion

The only anticipated resources during the completion of this Action Plan is the allocation from HUD. Any program income received during the year will be programmed for housing activities.

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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 | Provide Housing Assistance | 2017 | 2021 | Affordable Housing | | Housing Programs | CDBG: \$163,387 | Homeowner Housing Rehabilitated: 3 Household Housing Unit |
| 2 | Provide Public Service Assistance | 2017 | 2021 | Homeless Non-Homeless Special Needs | | Public Service | CDBG: \$300,000 | Public service activities other than Low/Moderate Income Housing Benefit: 857 Persons Assisted |
| 4 | Maintain compliance with CDBG rules and regulation | 2017 | 2021 | Planning, Administration, and Monitoring | | Housing Programs Public Infrastructure Public Service | CDBG: \$75,000 | Other: 1 Other |

Table 6 – Goals Summary

Goal Descriptions

| | | |
|---|-------------------------|---|
| 1 | Goal Name | Provide Housing Assistance |
| | Goal Description | Provide financial assistance for repair of owner-occupied housing units. This program is available on a Citywide basis to income qualified residents. |
| 2 | Goal Name | Provide Public Service Assistance |
| | Goal Description | The goal of this activity is to expand the availability of public services. The public services will be made available to income qualified residents who meet the intended demographic profile of program (i.e. student, senior resident) |
| 4 | Goal Name | Maintain compliance with CDBG rules and regulation |
| | Goal Description | Maintain compliance through monitoring of CDBG activities. |

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Projects

AP-35 Projects – 91.220(d)

Introduction

The City of Palm Coast intends to carry-out activities which are consistent with previous activities funded by the CDBG program. Specifically, these projects include: owner-occupied housing rehabilitation, the Seminole Woods neighborhood multi-use path, activities to be provided by the City's Recreation and Parks Department for youth and seniors (summer camp/youth activities, community outreach activities targeted at the senior population), grant program for non-profit organizations, or public service assistance for homeless services, and general planning, administration, and monitoring.

Projects

| # | Project Name |
|---|--------------|
| | |

Table 7 - Project Information

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

The data in the needs assessment and market analysis prepared for the Consolidated Action Plan indicate that there is a shortage of affordable housing units. Combined with an aging housing stock and a population that continues to be more elderly than the state average indicates the need to address the preservation of the existing units currently occupied by low-moderate income households. Additional input into priorities came from through the consultation and public input process, as well as the advisory committee.

The following are identified as obstacles to meeting underserved needs:

- The primary obstacle to meeting underserved needs is the limited financial resources available to address identified priorities.
- The City will continue to have a significant population over the age of 65, the need for increased supportive services for the elderly population (especially those on a fixed income) is significantly impacted by a downturn in the economy. Again, the limited resources available to the City place a significant obstacle in providing for the needs of the elderly.
- As the City's housing stock and neighborhoods begin to age, additional resources will be needed

to prevent the dilapidation of neighborhoods.

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AP-38 Project Summary
Project Summary Information

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AP-50 Geographic Distribution – 91.220(f)

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

The City has not identified a specific geographic area where assistance will be directed due to low-income or minority concentration. It is important to note however that Census Tracts/Block Groups which have greater than 51% low-moderate income households qualify for the use of CDBG funds, if the project has an areawide benefit. The City through the course of preparing the Annual Action Plan may identify infrastructure projects within low-moderate income census tracts and elect to fund qualified infrastructure projects or qualified activities with CDBG funds.

Geographic Distribution

| Target Area | Percentage of Funds |
|--------------------|----------------------------|
| | |

Table 8 - Geographic Distribution

Rationale for the priorities for allocating investments geographically

The City has not created a priority for allocating investments geographically in a specific area of the City. The housing program to be funded with CDBG funds will be available Citywide and will be available to benefit low-moderate income households.

Discussion

As previously stated the City has not identified any specific geographic areas for targeted use of CDBG funds. However, consistent with CDBG National Objectives, activities or projects may be funded in low-moderate income Census Tracts, Block Groups if the activity or project provide an areawide benefit.

Affordable Housing

AP-55 Affordable Housing – 91.220(g)

Introduction

The City intends to allocate a majority of the available CDBG funds to expand the available housing program in the City. The City’s housing program is available to all low-moderate income homeowners.

| One Year Goals for the Number of Households to be Supported | |
|---|---|
| Homeless | 0 |
| Non-Homeless | 3 |
| Special-Needs | 0 |
| Total | 3 |

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

| One Year Goals for the Number of Households Supported Through | |
|---|---|
| Rental Assistance | 0 |
| The Production of New Units | 0 |
| Rehab of Existing Units | 3 |
| Acquisition of Existing Units | 0 |
| Total | 3 |

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

Discussion

The City's housing rehabilitation assistance program is intended to provide financial assistance to low-moderate income families to bring existing housing up to minimum code standards.

AP-60 Public Housing – 91.220(h)

Introduction

The Flagler County Housing Authority does not manage any housing units within the City of Palm Coast.

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

The Flagler County Housing Authority does not manage any housing units within the City of Palm Coast.

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

The Flagler County Housing Authority does not manage any housing units within the City of Palm Coast.

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

The Flagler County Housing Authority does not manage any housing units within the City of Palm Coast. However, it is important to note that the Flagler County Housing Authority is not designated as troubled.

Discussion

N/A

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

Introduction

Due to limited funding availability and staff, the City does not directly provide services to address the homeless and other special needs activities. However, when appropriate, the City will coordinate with efforts of the CoC and social service agencies which provide assistance to homeless and special needs population. In the upcoming Program Year, the City will reach out to Flagler County to identify homeless services which may be funded with CDBG funds.

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

As previously stated, due to limited funding and institutional capacity, the City does not provide direct outreach service to the homeless. However, the City intends to coordinate with Flagler County to potentially use CDBG funds for homeless services.

Addressing the emergency shelter and transitional housing needs of homeless persons

As previously stated, due to limited funding and institutional capacity, the City does not intend to carry out activities directly to provide emergency shelter and transitional housing needs of homeless persons.

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

Due to limited funding availability and staff, the City does not directly provide services to address homeless programs that provide assistance for households that make the transition to permanent housing and independent living. As with other needs to assist the homeless, the City will coordinate with Flagler County, and the CoC to ensure that the proper referrals and contacts are made to agencies who

have the capacity to provide homeless services.

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

As stated previously, In recognition of the following limitations for the City: limited funds are available through the CDBG program to address all the needs in the City, and limited capacity to provide social services. The City will focus on prevention or assisting households from becoming homeless as a step to eliminating chronic homelessness.

Discussion

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

Introduction:

As previously discussed, within the City of Palm Coast, the lack of a diverse housing supply is a challenge that can be linked to the availability of affordable housing. The low supply of rental housing presents a challenge for households to have a housing choice. As reported in the City's most recent Analysis of Impediments to Fair Housing Choice, the lack of a diverse housing supply provides a challenge not just in supply but also translates to the affordability of rentals or home-ownership.

Actions it planned to remove or ameliorate the negative effects of public policies that serve as barriers to affordable housing such as land use controls, tax policies affecting land, zoning ordinances, building codes, fees and charges, growth limitations, and policies affecting the return on residential investment

The strategy to remove or ameliorate the barriers to affordable housing is to provide the opportunities to diversify the housing supply. Diversification of housing supply not only comes with an increase in the amount of rental units in the city, but also through the diversification of lot sizes for single-family residential development. Smaller lot sizes can serve as a way of addressing the need for "starter" homes which was highlighted by anecdotal evidence from various sources during the completion of the Analysis of Impediments for Fair Housing Choice study.

Discussion:

N/A

AP-85 Other Actions – 91.220(k)

Introduction:

In recognition of the City's limited capacity to provide assistance for certain activities, the City seeks to partner with existing agencies to provide the assistance needed by segments of the population not covered by direct City activities.

Actions planned to address obstacles to meeting underserved needs

As previously stated, the main obstacle to meeting underserved need is funding and the limited capacity to provide social service. The City when appropriate can provide support and assistance to the CoC or social service agencies to carry out their mission.

Actions planned to foster and maintain affordable housing

The City's main activity for the use of CDBG funds is to provide financial assistance to repair owner-occupied housing units. The intent of this activity is the maintenance/preservation of housing units which are serving low-moderate income households.

Actions planned to reduce lead-based paint hazards

As specified within the Local Housing Assistance Plan for the CDBG program, the following process controls activities related to lead-based paint hazards:

In order for a house to be considered feasible for rehabilitation, the proposed rehabilitation scope of work (SOW) must...

b) Provide interim controls or abatement for lead-based paint hazards as required by HUD and EPA for structures constructed prior to 1978. All houses built prior to 1978 will be tested for lead based paint. If lead based paint is found, interim control procedures will be used for all houses rehabilitated at or below \$25,000. Houses above \$25,000 will be rehabilitated using abatement procedures. The occupants will be notified of the hazards of lead-based paint, the symptoms and treatment of lead poisoning, how to avoid

poisoning, lead level screening requirements, and appropriate abatement procedures;

Actions planned to reduce the number of poverty-level families

In addition to expanding economic opportunity through the City's Business Assistance Center, the City also uses the strategy of providing financial assistance to qualified homeowners to repair and rehabilitate their primary dwelling units. This strategy becomes more important as the City's housing stock begins to age and as the elderly population of the City continues to grow. Providing financial assistance for housing rehabilitation ensures that the City continues to have decent, and safe affordable housing and that qualified households do not become overburdened with housing costs for repair and maintenance.

Actions planned to develop institutional structure

City staff participates in webinars to remain up-to-date to changes in CDBG rules as well as to keep informed of best practices in the administration of the CDBG program. Additionally, the city consults with local social service providers during the completion of the Annual Action Plan. This consultation process provides the opportunity to coordinate and dialogue on on-going and upcoming items for consideration in the City's CDBG activities.

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

City staff will continue to foster relationships with public and private housing and social service agencies to provide coordination and avoid duplication of services. Additionally, the City's Interlocal Agreement with Flagler County for a Joint Housing Program ensures that there is constant coordination between agencies.

Discussion:

City intends as required by the CDBG program to consult with various service providers in identifying community development needs in the City of Palm Coast. Furthermore, City staff responsible for the administration of the CDBG program regularly coordinates with other City departments to identify

infrastructure projects which may qualify for CDBG funds.

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Program Specific Requirements

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

Introduction:

The activities identified in the FFY 2020 Action Plan are consistent with activities carried out in previous CDBG program years. The City does not anticipate any program income at this time. However, it should be noted that program income from the Neighborhood Stabilization Program (NSP) are to be administered as part of the CDBG program. Should any income from the NSP program come to the CDBG program it will be allocated to housing activities funded by the CDBG program.

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

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

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

Other CDBG Requirements

- | | |
|---|--------|
| 1. The amount of urgent need activities | 0 |
| 2. The estimated percentage of CDBG funds that will be used for activities that benefit persons of low and moderate income. Overall Benefit - A consecutive period of one, two or three years may be used to determine that a minimum overall benefit of 70% of CDBG funds is used to benefit persons of low and moderate income. Specify the years covered that include this Annual Action Plan. | 70.00% |

The overall benefit will cover the period from FFY 2017 to FFY 2021.

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