



PALM BEACH
Gardens

City of Palm Beach Gardens



Community Development Block Grant
Fiscal Year 2019 Annual Action Plan
August 2019

Contents

AP-05 Executive Summary	2
AP-10 Consultation	3
AP-12 Participation	5
AP-15 Expected Resources.....	6
AP-20 Annual Goals and Objectives.....	8
AP-35 Projects.....	9
AP-38 Project Summary	10
AP-50 Geographic Distribution	11
AP-55 Affordable Housing.....	12
AP-60 Public Housing.....	13
AP-65 Homeless and Other Special Needs Activities.....	14
AP-70 HOPWA Goals.....	16
AP-75 Barriers to Affordable Housing.....	17
AP-85 Other Actions.....	18
AP-90 Program Specific Requirements	20
Appendix	22

AP-05 Executive Summary

The City of Palm Beach Gardens (City) is a fifth-year entitlement community with the US Department of Housing and Urban Development (HUD) for a Community Development Block Grant (CDBG) formula grant. In August of 2015, the City's first 5-year Consolidated Plan and FY 15 Annual Action Plan was submitted to HUD and accepted. In December of 2015, the City's Analysis of Impediments to Fair Housing was submitted to HUD and accepted. The City's primary goal as identified in the City's Consolidated Plan is to maintain the City's affordable housing stock, and the objective was to rehabilitate owner occupied single-family households. It was the City's goal to rehabilitate 10 households in the first year, and in each of the following years, for a total of 50 homes. The response and outreach from the public regarding the program over the past year has been positive, and the proposed objective of rehabilitating single family homes will remain the same. The City has completed the required environmental review for the owner occupied single family exterior rehabilitation project as a tiered review. The program materials and process have been developed, and the City has completed improvements on a total of thirteen homes. One home is currently under construction, and seven additional applications are under review for income eligibility. Several residents have been pre-screened who may apply in the near future.

To encourage citizen participation and solicit feedback, a two-column display advertisement was published on Monday, July 1, 2019 in the *Palm Beach Post*, a newspaper of daily general circulation, announcing a 30-day comment period on this annual action plan which was available for review both in person at City Hall, as well as on the City's CDBG webpage. The total public comment period consisted of 32 days. The advertisement also included a section in Spanish encouraging members of the limited English proficiency (LEP) public to call and comment about the program. The advertisement also indicated that a public hearing would be held at the regular City Council meeting scheduled for Thursday, August 1, 2019 where comments from the public could also be accepted. The public hearing location is ADA accessible, and all members from the public were invited to comment. The City also has a TDD machine available for members of the public that require assistance for hearing impairments.

This Action Plan is the City's application for receipt of federal funds for FY 2019. It identifies the projects and activities that will be carried out during the program year, which is October 1, 2019 to September 30, 2019. These projects and activities are established based on the priorities and goals identified in the City of Palm Beach Gardens 2015 – 2019 Consolidated Plan. The City's goal for FY 2019, as identified in the City's Consolidated Plan, is to maintain the City's affordable housing stock, and the objective will continue to be to rehabilitate owner occupied single-family households.

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

Introduction

The City of Palm Beach Gardens welcomes input from citizens, local agencies, and other stakeholders in the development and implementation of the City's Action Plan.

Provide a summary in regards to the City's coordination with the following entities in preparing the homeless strategy and resources: health services, social and fair housing services, publicly funded institutions and systems of care that may discharge persons into homelessness, corrections programs and institutions and business and civic leaders;

The Federal Consolidated Plan regulations require that the City consult with public and private agencies, government organizations, and public housing authorities during the preparation of the Annual Action Plan. As a fifth-year entitlement recipient of federal funds, the City of Palm Beach Gardens aims to continue building relationships and work closely with other agencies to provide resources for the City's residents on the City CDBG website for health, mental health and other services.

The City coordinates with and supports Palm Beach County's Continuum of Care, which is now known as the Homeless and Housing Alliance (HHA). This organization provides many coordinated initiatives and programs for health services, social and fair housing services, institutions and systems that care for discharged persons, and corrections programs, specifically with the provision of many supportive housing projects in various locations throughout the County to assist these homeless individuals or individuals who are at risk of becoming homeless. The City primarily supports through attendance of and participation in HHA quarterly meetings, and regular communication with HHA staff. The County's Senator Philip D. Lewis Homeless Resource Center (HRC) serves as the central point of access for all homeless populations, ensuring that needs are uniformly and fairly evaluated. Additionally, the City performs a Comprehensive Review on an annual basis of the full schedule of the Continuum of Care programs. The HHA also serves as a clearinghouse for disseminating information regarding various support programs, and City CDBG staff receive these communications and routinely posts and provides this information on the City's CDBG webpage.

An advertised public hearing will be held on August 1, 2019 to solicit input on the Action Plan. Additionally, individual consultations are conducted with the Mayor, Vice Mayor and Councilmembers in advance of the hearing so that they can provide input on the program. In particular, the City's Media Relations Department, the Building Department, and the Code Compliance Division of Unified Services have been especially critical in the marketing, development, and successful operation of the 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.

City staff reviews Palm Beach County's Continuum of Care projects for consistency with the City's Consolidated Plan. Many programs are available to assist the homeless and those at risk of becoming homeless. There are no layers of overlap between the City's Strategic Plan and the Continuum of Care, and therefore the programs complement each other nicely.

There are no homeless shelters or housing facilities within the City of Palm Beach Gardens city limits, however Palm Beach County offers several locations in close proximity for services, such as the Philip D.

Lewis Center, which assists homeless individuals and families in need by assessing for service eligibility, providing information, and referrals to agencies and resources in Palm Beach County.

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 is not a recipient of ESG funds at this time.

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. Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?

The City does not currently have its own housing authority and therefore supports the Palm Beach County Housing Authority and will continue to work diligently to identify areas where the City can support the County housing initiatives. Once again, in December of 2018, Staff and the City's Community Action Support Team (CAST) representatives also paired up with Solid Waste Authority and Christ Fellowship, a local faith-based organization, to assist in painting one of the City's CDBG applicant's homes which was rehabilitated through the program. CAST was established in 2007 and works to find solutions, resources, and programs in order to better assist the residents and the business community with Code Compliance related items. The Urban League of Palm Beach County (ULPBC) and the Homeless Housing Alliance (HHA) continues to provide information regarding services and upcoming workshops, seminars, such as mortgage assistance programs and classes, and public information which the City routinely posts on its CDBG webpage. This information furthers the City's goal of maintaining the City's affordable housing stock by making homeownership more attainable. Finally, the City owns and operates a senior center facility called Lakeside Center which provides activities and events for mental health and wellness for elderly residents.

Indicate if persons in designated areas where CDBG funds will be used and persons from PHA's were consulted in the development of this portion of the plan;

The City's CDBG funds are not assigned to specific areas in the City and rather are available City-wide to all residents that meet the income and property criteria. Therefore, publication of an advertisement in the Palm Beach Post, a newspaper with general circulation, which addresses the whole County and therefore the whole City is the most effective means of communication. The City also routinely publishes information in the City's Signature City Magazine, which is sent to every household within the jurisdictional boundaries of Palm Beach Gardens at no charge. The City does not have its own Public Housing Authority; however staff supports the initiatives of Palm Beach County's Housing Authority which mainly provides public housing vouchers.

Staff also attended a meeting on January 16, 2019 of the Homeless and Housing Alliance Executive Committee Meeting where many updates were provided regarding the various partner organizations. Staff is aware of the 2019 meeting schedule and routinely attends meetings.

Describe coordination with general units of regional government particularly agencies with

metropolitan-wide planning and transportation responsibilities;

The City coordinates with Palm Beach County which is a general unit of regional government that has large scale planning initiatives through the Homeless and Housing Alliance. The City's also has good relationships and maintains communication for input on program with neighboring jurisdictions such as Town of Jupiter, City of West Palm Beach, and the City of Boca Raton throughout the program year and has a collaborative approach toward proper and efficient administration of federal funds. The City continues to explore additional avenues to further increase regional coordination.

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

No agency types were specifically excluded.

Outline the consultation the City has had with entities in preparing the action plan concerning lead based paint. This may include information from the State and local health and child welfare agencies, including health department data regarding addresses of children who have been identified as lead poisoned;

The City supports the State Department of Health to reduce lead-based paint hazards within Palm Beach Gardens with mandatory lead-based paint inspection of all rehabilitation projects, and related abatement if necessary for the qualified applicants to the City's CDBG program. The City also distributes educational materials to each applicant during the application intake process. Data and information regarding children who have been identified as lead poisoned has not been updated since 2011 but generally shows a downward trend of new cases.

Describe other local/regional/state/federal planning efforts considered when preparing the Plan.

City staff reviews Palm Beach County's Continuum of Care projects for consistency with the City's Consolidated Plan, and will continue to do so when contacted by the County. Staff also reviews the City's Comprehensive Plan's Goals, Objectives and Policies with regard to workforce and affordable housing, and found the City's anticipated activities to be in compliance with the Policies.

AP-12 Participation - 91.105, 91.200(c)

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

Summarize citizen participation process and how it impacted goal-setting.

To encourage citizen participation and solicit feedback, a two-column display advertisement was published on Monday, July 1, 2019 in the *Palm Beach Post*, a newspaper of daily general circulation, announcing a 30-day comment period on this annual action plan which was available for review both in person at City Hall, as well as on the City's CDBG webpage. The advertisement also included a section in Spanish encouraging members of the limited English proficiency (LEP) public to call and comment about the program. The advertisement also indicated that a public hearing was held at the regular City Council meeting scheduled for Thursday, August 1, 2019 where comments from the public will also be accepted during the public hearing. The public hearing location is ADA accessible, and all members from the public are invited to comment. The City also has a TDD machine available for members of the public that require assistance for hearing impairments.

The City is continuing the same priorities and goals as established in the previous year, for FY 2018. The program has been well received by the residents.

Citizen Participation Outreach

Mode: Newspaper Ad

Target of Outreach: Non-targeted/broad community; Non-English Speaking – Spanish.

Summary of response/attendance: No comments were submitted.

Summary of comments received: N/A

Mode: Public Hearing

Target of Outreach: Non-targeted/broad community.

Summary of response/attendance: No comments were submitted.

Summary of comments received: N/A

Expected Resources

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

Introduction

As a fifth year entitlement recipient of federal funds, the City of Palm Beach Gardens anticipates receiving an annual allocation of Community Development Block Grant (CDBG) funds. The City will continue to explore and explore applying for additional funding opportunities, such as HOME funds and State Housing Initiative Partnership (SHIP) funds.

Anticipated Resources

Program	Source of Funds	Uses of Funds	Expected Amount Available: Year 4				Expected Amount Available Remainder of Con Plan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
CDBG	public - federal	Acquisition Admin and Planning Economic Development Housing Public Improvements Public Services	\$228,608.00	0	\$327,420.13	\$556,028	\$0.00	CDBG allocation used to carry out priority need projects, especially housing rehabilitation and general planning/program administration within the City.
HOME	public - federal	Acquisition Homebuyer assistance Homeowner rehab Multifamily rental new construction Multifamily rental rehab New construction for ownership TBRA	0	0	0	0	0	The City of Palm Beach Gardens may pursue funds from the HOME Incentives Partnership (HOME)Program. This is federal money the City will explore utilizing as a participating jurisdiction of the Palm Beach County HOME Consortium. HOME funds can only be used to address housing needs of households at 80% AMI or less. The City may use HOME funds for

								home repair and/or purchase assistance.
HOPWA	public - federal	Permanent housing in facilities Permanent housing placement Short term or transitional housing facilities STRMU Supportive services TBRA	0	0	0	0	0	N/A
ESG	public - federal	Conversion and rehab for transitional housing Financial Assistance Overnight shelter Rapid re-housing (rental assistance) Rental Assistance Services Transitional housing	0	0	0	0	0	N/A

Table 1 - 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

Federal funds will be used to leverage other resources available to extend the level of assistance the City can provide or scope of project that can be undertaken. The City currently does not have any funding source that requires matching.

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

The City does not have any publicly-owned land or property in Palm Beach Gardens that is available to address the needs identified in this Plan.

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	Maintain City's affordable housing stock	2019	2020	Affordable Housing		Priority I	CDBG: \$182,887.00	Homeowner Housing Rehabilitated: 10 Household Housing Units

Table 2 – Goals Summary

Goal Descriptions

1	Goal Name	Maintain City's affordable housing stock
	Goal Description	The City anticipates allocating approximately \$182,887.00 in CDBG funding for eligible homeowner housing rehabilitation projects, specifically for general housing rehabilitation.

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

The City is not a recipient of HOME funds at this time.

Projects

AP-35 Projects – 91.220(d)

Introduction

PROJECT NAME: Housing Rehabilitation

AMOUNT REQUESTED: \$182,887.00

PROJECT DESCRIPTION: The City’s home repair program provides exterior home repair assistance to homeowners who are experiencing conditions in and around their homes that pose a threat to their health, safety, and welfare. The home repair program is limited to low- to moderate- income homeowners and is available on a “first-eligible, first-served” basis.

Target Beneficiaries: Low- to moderate-income persons

Geographic Distribution: Citywide and/or eligible neighborhoods

National Objective: 570.208 (a) (3) Low/Mod Housing

Eligible Category: 570.202 (a) (1) Eligible rehabilitation and preservation activities

Objective Category: Suitable Living Environment

Proposed Outcome: Availability/Accessibility

Performance Measure: 10 households assisted.

Projects

#	Project Name
1	Housing Rehabilitation
2	Planning and Administration

Table 3 – Project Information

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

This is an allocation priority because it furthers the need/goal of the City preserving and extending the life of the existing housing stock, and will provide financial assistance so that homeowners can repair and afford to stay in their homes.

AP-38 Project Summary

Project Summary Information

1	Project Name	Housing Rehabilitation
	Target Area	
	Goals Supported	Maintain City's affordable housing stock
	Needs Addressed	Priority I
	Funding	CDBG: \$182,887.00
	Description	The City's home repair program provides home repair assistance to homeowners who are experiencing conditions in and around their homes that pose a threat to their health, safety, and welfare. The home repair program is limited to low- to moderate- income homeowners and is available on a first come, first served basis.
	Target Date	9/30/2020
	Estimate the number and type of families that will benefit from the proposed activities	10 low- to moderate-income households.
	Location Description	Citywide.
	Planned Activities	
2	Project Name	Planning and Administration
	Target Area	
	Goals Supported	Maintain City's affordable housing stock
	Needs Addressed	Priority I
	Funding	CDBG: \$45,721.00
	Description	Cost associated with administering the Community Development Block Grant (CDBG) program.
	Target Date	9/30/2020
	Estimate the number and type of families that will benefit from the proposed activities	n/a
	Location Description	City-wide.
	Planned Activities	Program administration, preparation of the Annual Action Plan (AAP) and preparation of Consolidated Annual Performance and Evaluation Review (CAPER).

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

There is no specific geographic area within the City to be targeted. The home improvements will occur in various, undetermined locations throughout Palm Beach Gardens.

Geographic Distribution

Target Area	Percentage of Funds
n/a	

Table 4 - Geographic Distribution

Rationale for the priorities for allocating investments geographically

There is no specific geographic area within the City to be targeted. The home improvements will occur in various, undetermined locations throughout Palm Beach Gardens, and assistance is available to residents in all neighborhoods that demonstrate compliance with HUD's low- to moderate-income criteria.

Discussion

There is no specific geographic area within the City to be targeted. The home improvements will occur in various, undetermined locations throughout Palm Beach Gardens.

Affordable Housing

AP-55 Affordable Housing – 91.220(g)

Introduction

One Year Goals for the Number of Households to be Supported	
Homeless	0
Non-Homeless	10
Special-Needs	0
Total	10

Table 5 - 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	10
Acquisition of Existing Units	0
Total	10

Table 6 - One Year Goals for Affordable Housing by Support Type

Discussion

It is assumed that with approximately \$182,887.00 available for housing rehabilitation that approximately 10 homes at approximately \$18,288.70 each will be supported. Program guidelines and criteria for this project have been developed and are currently being utilized by staff.

AP-60 Public Housing – 91.220(h)

Introduction

The City of Palm Beach Gardens does not have any public housing facilities within the jurisdictional boundaries, and therefore relies on the assistance provided by Palm Beach County Housing Authority.

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

Although, the City does not have any specific actions planned at this time to address any need for public housing during the next year the City will remain in contact with the Palm Beach County Housing Authority. The City will make continuous efforts to communicate with the agency in the event there is a way the City can assist, and participates in quarterly meetings as needed.

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

At this time, the City does not have any public housing units, but supports Palm Beach County Housing Authority in their efforts to provide public housing for the area, and also supports the goal of homeownership. The City will continue to communicate with the Housing Authority should a direct need be anticipated that the City can assist with. Additionally, the Urban League of Palm Beach County routinely hosts workshops and events, and the City continues to work closely with the organization to spread the word regarding future events hosted by the ULPBC.

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

The City does not have any public housing; therefore, no PHA has been designated as troubled. Additionally, the Palm Beach County Housing Authority is not considered troubled.

Discussion

There are no public housing units in Palm Beach Gardens, so the City will continue communication with the Palm Beach County Housing Authority to support their public housing efforts.

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

Introduction

The City of Palm Beach Gardens will work with and support countywide homeless initiatives to help address the housing needs of homeless persons.

AP-65 – Specify the activities the City plans to undertake during the next year to address the housing needs for persons who aren't homeless but have other special needs (elderly, frail elderly and persons with disabilities);

Many of the City's applicants for the CDBG home repair program are elderly persons and the improvements provided allow these residents to continue to live in their homes and age in place by addressing long term, large scale home improvements that are unattainable for individuals with a limited fixed income. The City also includes exterior disability improvements as eligible improvements under the home repair program, which could include but is not limited to creation of new accessibility ramps or modifying existing steps into ramps for accessibility.

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

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

The City of Palm Beach Gardens will continue to work with and support Palm Beach County's homeless initiatives to help address the housing needs of homeless persons.

Addressing the emergency shelter and transitional housing needs of homeless persons

The City of Palm Beach Gardens will work with and support countywide homeless initiatives to help address the 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

The City of Palm Beach Gardens will work with and support countywide homeless initiatives to help address the housing needs of homeless persons. The City also has the Homeless Coalition of Palm Beach County's website listed as a resource for the public to find for assistance.

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

The City of Palm Beach Gardens home repair program will serve to make housing more affordable

by providing financial assistance for home repair improvements. The City has established a relationship with the Palm Beach County Homeless and Housing Alliance (HHA). Due to the proximity and regional nature of the northern Palm Beach County Area without clear geographical boundaries between jurisdictions, a regional, County-wide approach toward this issue is more appropriate and efficient. The HHA has studied supportive housing needs in the past and is working on a plan to address these needs. Staff routinely attends meetings where these topics are discussed so information can be disseminated to individuals that may call or reach out for assistance to the City.

Discussion

The most recent Point-In-Time count was held in 2019 and reported a total of 226 unsheltered individuals in Palm Beach County. A break-down of Palm Beach Gardens specific statistics was not available this year. However, the number of homeless persons is not high enough in Palm Beach Gardens to warrant establishment of a new program agency, so the City of Palm Beach Gardens will continue to work with and support countywide homeless initiatives such as the Homeless and Housing Alliance, as well as perhaps the Homeless Coalition of Palm Beach County, to help address the housing needs of homeless persons.

AP-70 HOPWA Goals - 91.220 (I)(3)

One year goals for the number of households to be provided housing through the use of HOPWA for:	
Short-term rent, mortgage, and utility assistance to prevent homelessness of the individual or family	0
Tenant-based rental assistance	0
Units provided in permanent housing facilities developed, leased, or operated with HOPWA funds	0
Units provided in transitional short-term housing facilities developed, leased, or operated with HOPWA funds	0
Total	0

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

Introduction:

As a recipient of Community Development Block Grant (CDBG) entitlement funding from the US Department of Housing and Urban Development (HUD), the City of Palm Beach Gardens is required to create and maintain an *Analysis of Impediments to Fair Housing Choice (AI)* to identify impediments or barriers to affordable housing and fair housing choice, and create actions toward the resolution of the barriers. The AI was submitted to HUD in December of 2015 and accepted. The AI identified perceived impediments to affordable housing and fair housing choice, and identified actions to combat these impediments.

The City proactively updated the City's Citizen Participation Plan in 2017 to address the new Affirmatively Furthering Fair Housing regulation regarding the Assessment of Fair Housing (AFH).

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

As of a part of the development of the AI, the City of Palm Beach Gardens determined recommendations for actions that can be implemented in federal grant program administration and other local government operations to resolve the identified barriers. These recommended actions to resolve the barriers identified include:

1. Promoting awareness regarding County, State and Federal fair housing laws
2. Reviewing all public policies, such as in the City's Comprehensive Plan, to identify potential barriers to affordable housing

Discussion:

The City reviewed all of its public policies through its Analysis of Impediments to Fair Housing Choice (completed in December of 2015) to identify barriers to affordable housing and fair housing. The AI reviewed possible barriers such as land use controls, zoning ordinances, building codes, fees and charges, growth limitations, and policies affecting the return on residential investment.

AP-85 Other Actions – 91.220(k)

Introduction:

The City of Palm Beach Gardens coordinates its limited resources through a single department which facilitates the coordination of all rehabilitation efforts targeted to low-to-moderate income households throughout the City. Staff coordinates efforts with other Palm Beach County governmental agencies as well as neighboring cities, via regular communication with the staff responsible for administering the housing and community development programs.

Actions planned to address obstacles to meeting underserved needs

Participation in the CDBG program and the relationship with HUD has spring-boarded the City into studying and participating in working toward a solution for the affordable housing crisis in Palm Beach County. The City's Comprehensive Plan includes provisions for exploring workforce housing density bonuses and expedited permitting. The City Council also recently approved a professional services contract to work with Strategic Planning Group to develop a Comprehensive Workforce Housing Study and Plan/Program.

Actions planned to foster and maintain affordable housing

The City's rehabilitation program is designed to enable residents to maintain their housing affordably by providing home repair assistance.

Actions planned to reduce lead-based paint hazards through the home rehabilitation program;

The City requires mandatory lead-based paint inspection, both interior and exterior, of all qualified applicants to the City's CDBG rehabilitation program in accordance with the monetary thresholds established in the federal guidelines, and related abatement if necessary.

If the City comes across a project where lead-based paint is identified as an issue, the City will address and take appropriate steps to reduce the hazard. Thus far, two homes have required lead-based paint abatement. Staff also distributes educational materials to each applicant through the assistance application intake process.

Actions planned to reduce the number of poverty-level families

No specific actions are planned to reduce the number of poverty-level families, except for the provision of the home repair program, which could potentially assist poverty-level families and therefore reduce the housing cost burden.

Actions planned to develop institutional structure

The City will continue to coordinate planning and implementation efforts internally and externally to further the goals of the Five-Year Consolidated Plan and meet the needs of low-to-moderate income residents.

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

The City has a Resources page on its website which lists various social services and both private

and public entities that may help the public find various kinds of assistance. The City will continue to reach out and communicate to the public the many different avenues assistance and coordination are available.

Discussion:

The City of Palm Beach Gardens will address maintaining affordable housing through its Single Family Housing Rehabilitation Program. This Program will also help address poverty (e.g. low-income homeowners) and removing possible life safety housing hazards including roof repair and accessibility for the disabled and special needs individuals. Lead-based paint hazards are rare in Palm Beach Gardens since the majority of housing was built in the last thirty years.

The Housing Rehabilitation Program assists the City in developing an institutional response to housing rehabilitation for low-income homeowners, which was initially being handled by a volunteer initiative. Through dedicated staff members, new coordinated efforts will be enhanced with other public and private housing and social service agencies.

Program Specific Requirements

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

Introduction:

There is no program income, proceeds from section 108 loan guarantees, surplus funds, grant funds returned to the LOC, or income from float funded activities.

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. The years covered that include this Annual Action Plan are FY 2018 and FY 2019.	100.00%

HOME Investment Partnership Program (HOME)

Reference 24 CFR 91.220(I)(2)

1. A description of other forms of investment being used beyond those identified in Section 92.205 is as follows:

The City of Palm Beach Gardens will not be a direct recipient of HOME funds. It will work closely with Palm Beach County to be a part of the County HOME Consortium.

2. A description of the guidelines that will be used for resale or recapture of HOME funds when used for homebuyer activities as required in 92.254, is as follows:

The City of Palm Beach Gardens will not be a direct recipient of HOME funds. It will work

closely with Palm Beach County to be a part of the County HOME Consortium.

3. A description of the guidelines for resale or recapture that ensures the affordability of units acquired with HOME funds See 24 CFR 92.254(a)(4) are as follows:

The City of Palm Beach Gardens will not be a direct recipient of HOME funds. It will work closely with Palm Beach County to be a part of the County HOME Consortium.

4. Plans for using HOME funds to refinance existing debt secured by multifamily housing that is rehabilitated with HOME funds along with a description of the refinancing guidelines required that will be used under 24 CFR 92.206(b), are as follows:

The City of Palm Beach Gardens will not be a direct recipient of HOME funds. It will work closely with Palm Beach County to be a part of the County HOME Consortium.

Emergency Solutions Grant (ESG)

Reference 91.220(l)(4)

1. Include written standards for providing ESG assistance (may include as attachment)
The City of Palm Beach Gardens is not a direct recipient of ESG funding.
2. If the Continuum of Care has established centralized or coordinated assessment system that meets HUD requirements, describe that centralized or coordinated assessment system.
The City of Palm Beach Gardens is not a direct recipient of ESG funding.
3. Identify the process for making sub-awards and describe how the ESG allocation available to private nonprofit organizations (including community and faith-based organizations).
The City of Palm Beach Gardens is not a direct recipient of ESG funding.
4. If the jurisdiction is unable to meet the homeless participation requirement in 24 CFR 576.405(a), the jurisdiction must specify its plan for reaching out to and consulting with homeless or formerly homeless individuals in considering policies and funding decisions regarding facilities and services funded under ESG.
The City of Palm Beach Gardens is not a direct recipient of ESG funding.
5. Describe performance standards for evaluating ESG.
The City of Palm Beach Gardens is not a direct recipient of ESG funding.

Discussion:

The City of Palm Beach Gardens is not a direct recipient of ESG funding.

Appendix – Public Comments

TBD

DRAFT FOR COMMENT