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2018

ONE YEAR ACTION PLAN

Lake County Housing & Community Development
2008 Classique Lane, P.O. Box 7800
Tavares, FL 32778



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Executive Summary

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

1. Introduction

The Consolidated Plan is a collaborative process whereby Lake County established a unified vision for community development actions. Through the planning process the County used the opportunity to shape the various housing and community development programs into effective, coordinated housing and community development strategies. It also created the opportunity for strategic planning and citizen participation to take place in a comprehensive context. The Consolidated Plan approach is also the means to meet U.S. Department of Housing and Urban Development (HUD), Community Planning and Development (CPD) submission requirements for the Community Development Block Grant (CDBG) formula program.

In fiscal year 2018, Lake County will receive \$1,284,695 in CDBG funds, to address identified community development needs. To receive these federal funds, the County must assess local housing and community development needs and resources and socioeconomic impediments toward building viable neighborhoods. This Plan is a prerequisite to receiving the grant funds. HUD envisions the Consolidated Plan to function as:

1. A planning document for Lake County, which builds on a participatory process including government, residents, businesses, and educational institutions
2. An application for federal funds under HUD's formula grant programs, and
3. An action plan that provides a basis for assessing performance

The statutes for the formula grant programs set forth three basic goals against which the plan and the jurisdiction's performance under the plan will be evaluated by HUD. Each jurisdiction's plan must state how it will pursue these goals for all community development programs, as well as all housing programs. These statutory program goals are decent housing, a suitable living environment, and economic opportunities. As mandated by HUD, this document is a complete consolidated plan and it contains the information required by §91.200 through §91.230 and it will be submitted according to instructions prescribed by HUD (including tables and narratives).

2. Summarize the objectives and outcomes identified in the Plan

This could be a restatement of items or a table listed elsewhere in the plan or a reference to another location. It may also contain any essential items from the housing and homeless needs assessment, the housing market analysis or the strategic plan.

The Consolidated Plan furthers the statutory goals through a collaborative process whereby a community establishes a unified vision for community development actions. This vision evolves into a Five-Year Plan that offers local jurisdictions a better chance to shape the various programs into effective, coordinated neighborhood and community development strategies that create a specific course of action for revitalization. The Plan builds on local assets and coordinates a response to the needs of the community; integrates economic, physical, environmental, community, and human development in a comprehensive coordinated fashion. Once the five-year strategic plan is developed, it sets forth goals, objectives, and performance benchmarks for measuring progress.

The statutes for the formula grant programs set forth three basic goals against which the plan and the jurisdiction's performance under the plan will be evaluated by HUD. Each jurisdiction's plan must state how it will pursue these goals for all community development programs, as well as all housing programs. These statutory program goals are:

A SUITABLE LIVING ENVIRONMENT-- which includes:

- Improving the safety and livability of neighborhoods;
- Eliminating blighting influences and the deterioration of property and facilities;
- Increasing access to quality public and private facilities and services;
- Reducing the isolation of income groups within areas through spatial de-concentration of housing opportunities for lower income persons and the revitalization of deteriorating neighborhoods;
- Restoring and preserving properties of special historic, architectural, or aesthetic value; and
- Conserving energy resources and use of renewable energy sources.

EXPANDED ECONOMIC OPPORTUNITIES-- This includes:

- Job creation and retention;
- Establishment, stabilization and expansion of small businesses (including micro-businesses);
- The provision of public services concerned with employment;
- The provision of jobs to low-income persons living in areas affected by those programs and activities, or jobs resulting from carrying out activities under programs covered by the plan;
- Availability of mortgage financing for low-income persons at reasonable rates using nondiscriminatory lending practices;
- Access to capital and credit for development activities that promote the long-term economic and social viability of the community; and
- Empowerment and self-sufficiency for low-income persons to reduce generational poverty in federally assisted housing and public housing.

The Consolidated Plan for Lake County laid out the following goals and objectives:

- Housing Improvement: Provide mobile home replacement and emergency repairs for persons/families living in dilapidated mobile homes. Increase access to affordable rental units for low-income elderly.
- Community Improvement: Working with our Urban County Partners to create neighborhood center, improve a community center, road improvements, and access to sewer.
- Public Services: Create access to healthcare, counseling and nutritional needs for families in need. Increase college/job training opportunities for Section 8 youth.
- Administration: Administration and planning for program.

3. Evaluation of past performance

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

The last annual report prepared for HUD, the Comprehensive Annual Performance and Evaluation Report (CAPER) was for federal fiscal year 2016. The County's grant program for that year ended September 30, 2017. The next report to HUD for fiscal year 2017 will be due by the end of 2018 for the period ending September 30, 2018.

During FY 2016, the County expended \$401,255 and completed 11 housing rehabilitation, 2 mobile home replacement and 1 handicap barrier removal projects for homeowners and a road improvement project in Tavares. The CDBG program also pays for a County Health Worker who serves a low income population by outreaching to those with high risk health problems and connecting them to services and supported a college outreach project for low income youth.

The FY 2017 program continued the implementation of several Urban County partner programs including a Community Learning Center in Leesburg, Park improvements in Tavares and the Umatilla Community Center as well as the housing improvement programs.

4. Summary of Citizen Participation Process and consultation process

Summary from citizen participation section of plan.

The Citizen Participation Plan (CP) encourages public participation, emphasizing involvement by low and moderate-income persons, particularly those living in areas targeted for revitalization and areas where funding is proposed. In addition, it encourages the participation of all its citizens, including minorities,

non-English speaking persons, and persons with disabilities. Two County Community Services staff members are bi-lingual and able to interact with the County's non-English speaking Hispanic population. In addition, written materials can be provided in Spanish, and the County makes all reasonable accommodations for persons with special needs that request assistance.

Technical assistance is provided to both organizations and individuals, including those representatives of low and moderate income people, who are interested in submitting a proposal to obtain funding for an activity and request such assistance. An advertisement and mailing provided the Request for Proposals to numerous county entities.

Lake County provided the public with reasonable and timely access to the Annual Plan. The 2018 Action Plan and recommended use of funding was posted for public review and comment for the requisite 30 days. The County posted display advertisements in the local *Leesburg Daily Commercial* Newspaper. Information was also posted on the County websites, in public places and emailed to people and agencies on our emailing list, in accordance with the Citizen Participation Plan. A public hearing was held July 11, 2018 to receive further comment. A copy of the display advertisement and meeting minutes can be found in the appendices.

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.

To be included at the end of the public comment period

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

To be included at the end of the public comment period

7. Summary

To be included at the end of the public comment period

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
Lead Agency	LAKE COUNTY	
CDBG Administrator		Housing and Community Development
HOPWA Administrator		
HOME Administrator		
HOPWA-C Administrator		

Table 1 – Responsible Agencies

Narrative (optional)

The Consolidated Plan consists of the information required in 24 Code of Federal Regulations (CFR) Part 1, Consolidated Submissions for Community Planning and Development Programs. The Consolidated Plan serves as a planning document, application for Federal Funds, strategic plan in carrying out U.S. Department of Housing and Urban Development (HUD) programs and Action Plan that provides the basis for assessing performance. The Lake County Five Year Consolidated Plan covers the time period from October 1, 2015 through September 30, 2020. The Plan identifies community needs and details initiatives to address those needs and is structured in a format that will help to measure performance. This five-year planning document for the period of 10/01/15-9/30/2020, identifies priority housing, homeless, special populations and community development needs, establishes general strategies for addressing those needs, and integrates the application, planning, and citizen participation requirements for the Community Development Block Grant and all other sources of state and federal funds administered through the Lake County Housing and Community Development Division. Lake County is designated as an Urban County by HUD and consists of all unincorporated areas in the County as well as Leesburg, Tavares, Minneola, Montverde, and Howey-in-the Hills. The 2015-2019 Consolidated Plan (Plan) is a detailed illustration of community development issues in Lake County and includes a directory of community services and proposed funding activities that address community priorities. The County is mandated to submit this Plan to HUD, in an effort to remain eligible for federal funds. This Plan is the direct result of the collaborative efforts of the County and other public and private agencies.

Consolidated Plan Public Contact Information

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

1. Introduction

Lake County shall be the lead agency having overall responsibility for overseeing the development of the Consolidated Plan and Annual Plan and ensuring that the program is carried out in compliance with the requirements in 24 CFR Parts 91 and 92.

During the development of the Consolidated Plan, the following organizations and public agencies participated in the process: Children's Services Council, Elder Affairs Coordinating Council, Homes In Partnership, The ROCC, Boys & Girls Clubs of Lake & Sumter Counties, Community Medical Care Center, Greater Leesburg CDC, Early Learning Coalition of Lake County, Haven of Lake & Sumter Counties, Lake Sumter Children's Advocacy Center, LifeStream Behavioral Center, Inc.- Child Care Choice Services- LifeStream Deaf Service Center of Lake County, Inc. - LovExtension, Inc., New Beginnings of Lake County, Inc. New Vision for Independence, Inc.

For FY 2018, the Annual Action Plan describes a one-year plan budget for project activities that will be undertaken with funding from the CDBG grant program and all other state and federal funds. Agencies were solicited for projects to be funded as well as input to the plan and comments on the proposed use of 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(l))

These efforts are accomplished on two fronts. The Mid-FL Homeless Coalition works in collaboration with the Lake County Housing and Community Development Division, which consist of Community Development, Affordable Housing, and Public Housing (Section 8). Lake County is a member of the Continuum of Care; its clients can be referred to other governmental health, mental health, and other social service agencies as needed. The CoC consists of the various human services agencies that serve the homeless and non-homeless populations in their respective county(ies).

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 Lake County Housing and Community Development (LCHCD) Division works in collaboration with the Mid FL Homeless Coalition (MFHC) to ensure that all federal and State funds available for homelessness are used to address highest priority needs of the chronically homeless, homeless families, children aging out of foster care, homeless veterans and domestic violence victims who become homeless. The MFHC is charged with the responsibility of preparing the County's homeless strategy and is the lead agency for

the Continuum of Care. The members of the MFHC meet monthly to discuss and strategize with each member and all the other social service agencies in the region. The LCHCD operates the Shelter plus Care program in conjunction with social service agencies providing the wrap around services. Lake County has also partnered with New Beginnings to create 20 additional beds of transitional housing to serve homeless families. Lake County has also partnered with LifeStream and the City of Leesburg Housing Department to create 47 units of affordable housing to help prevent or deter homelessness due to housing cost burden.

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 Lake County Housing and Community Development (LCHCD) Division works in collaboration with the Mid FL Homeless Coalition (MFHC) to ensure that all federal and State funds available for homelessness are used to address highest priority needs of the chronically homeless. The MFHC is charged with the responsibility of preparing the County's homeless strategy and is the lead agency for the Continuum of Care. The members of the MFHC meet monthly to discuss and strategize with each member and all the other social service agencies in the region.

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

Lake County has two (2) long standing Advisory Committees that are comprised of appointed community members charged with identifying and addressing the gaps in service for at-risk children and families and our elderly population respectively. The Children's Services Council (CSC) and Elder Affairs Coordinating Council (EACC) meet monthly to discuss and develop recommendations to improve services for our most vulnerable populations. Local for-profit and not-for-profit family and elder service providers attend and participate regularly at both the CSC and EACC monthly meetings. The County Commission pledges funds annually to be awarded through a competitive grant process to address the most critical needs identified by the committees. The respective committees make recommendations to the Board of Commissioners for grant funding to the health and social service providers.

Table 2 – Agencies, groups, organizations who participated

1	Agency/Group/Organization	Lake County Human Services Children’s Services Council
	Agency/Group/Organization Type	Services-Health, Education, Counseling, Child Welfare, Nutrition, Housing For Profit and Not-for-Profit agencies and organizations Local Government agencies
	What section of the Plan was addressed by Consultation?	Homeless and non-homeless needs
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Monthly advisory committee meetings. Identification of gaps in service and current needs. Recommendations for grant award funding to appropriate health and social services agencies.
2	Agency/Group/Organization	Lake County Elder Affairs Coordinating Council
	Agency/Group/Organization Type	Services – Housing, Health, Nutrition, Counseling
	What section of the Plan was addressed by Consultation?	Homeless and non-homeless needs
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Monthly advisory committee meetings. Identification of gaps in service and current needs. Recommendations for grant award funding to appropriate health and social services agencies.

3	Agency/Group/Organization	LifeStream Behavioral Center
	Agency/Group/Organization Type	Housing 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 Publicly Funded Institution/System of Care Major Employer
	What section of the Plan was addressed by Consultation?	Homeless Needs - Chronically homeless
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Behavioral health provider which provides shelter, mental health/substance abuse services, and is a homelessness drop-in center. It is a contracted community partner.
	Agency/Group/Organization Type	Services-Children Services-Elderly Persons Services-Persons with Disabilities

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

All the various groups were consulted.

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	Mid FL Homeless Coalition	The overarching goals of the strategic plan intersects with the goals of the coalition to reduce the rate of homelessness, increase housing options and improve the quality of living for those at risk of losing housing.

Table 3 – Other local / regional / federal planning efforts

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 Citizen Participation Plan in accordance with the Housing and Community Development Act of 1974, as amended and 24 CFR Parts 91, 92, 510, 574, 576 and 968 of the HUD Regulations provides for and encourages citizen participation with particular emphasis on persons of low and moderate income that are residents of slum and blighted areas. The Division further provides citizens reasonable and timely access to local meetings, information and records. In addition, technical assistance is made available to low and moderate income representative groups. The Citizen Participation Plan details the process to develop needs, review proposed activities and program performance, as well as the manner in which hearings are advertised and conducted.

For example, the first public hearing was conducted on March 14, 2018 to solicit citizen views and adopt a vision statement with priorities for investment. Local and regional organizations notified of the hearing and invited to attend. Outreach included the Lake County Housing Authority, the Mid Florida Homeless Coalition, the City of Eustis Planning Department, The City of Groveland, the City of Leesburg Housing and Community Revitalization Area Department and the four Urban County Participating Cities are Tavares, Leesburg, Howey-in-the-Hills, and Minneola. Moreover, the Lake County Housing Authority is the designated public housing authority for the Urban County and the designated Shelter Plus Care provider.

The public hearing was conducted by County staff representatives to solicit citizen input into the planning process and to plan project implementation. The first public hearing will be conducted by staff on March 14, 2018 and the second hearing on July 11, 2018. The Lake County Board of County Commissioners will meet on August 7, 2018 to consider the Consolidated Plan and the Annual Action Plan.

The citizen participation process provides ample time for written complaints and grievances. As such, the County, in regards to its CDBG program, takes a two-fold approach to achieving the above goal. The first approach provides for, encourages, and assists eligible area communities in maintaining civic associations, which have over the years facilitated the citizen participation function in the Community Development Block Grant Program. The unincorporated area civic groups function on an on-going basis and their priority neighborhood needs are incorporated into the Consolidated Plan goals and priorities by the Housing and Community Development Division. The second approach provides for the representation of municipalities which make up the Urban County.

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 Residents of Public and Assisted Housing	No members of the public attended the public hearing.	No comments were received.	N/A	
2	Newspaper Ad	Non-targeted/broad community	No comments were received during the public comment period.	TBD		
3	Public Meeting	Non-targeted/broad community Residents of Public and Assisted Housing	TBD	TBD		

Table 4 – Citizen Participation Outreach

Expected Resources

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

Introduction

Federal resources are critical in addressing local housing and community development needs. All strategies and activities planned under the Consolidated Plan contribute to promoting economic opportunities in Lake County’s jurisdiction by providing many very-low, and low to moderate-income persons and households with access to services, financial stabilization, and affordable housing. These funds also result in collective efforts that include partnerships with many local nonprofit organizations. Many of these strategies and activities cannot be implemented without the anticipated resources listed in this section.

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	\$1,284,695	0	\$680,576.47	\$1,965,271.47	\$1,258,780	

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

Every reasonable effort is made to leverage financial support from other sources in addition to using federal funds to complete the projects undertaken. CDBG sub-recipients must document as part of the application process the attempt to seek funding from other sources before applying for CDBG funding as part of the project selection, CDBG applicants receive bonus points if the funding sought from CDBG was used to leverage other dollars.

Most programs use other funds to leverage the limited state and federal funds. The State Housing Incentive Program (SHIP) program offers down-payment and closing cost assistance, with lender's mortgage funds providing the bulk of the housing investment. Community Development Block Grant funds are usually used in conjunction with other funding.

The CoC competes annually for funding for the Permanent Supportive Housing program. The County administers the Section 8 Rental Assistance program.

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

Not applicable, however, in the rare instances that the County acquires parcels adequate in size and location for development, a process has been established to evaluate the suitability for improvement. If the acquired property does not meet the County's need it shall initially be offered to the municipalities, non-profit developers and finally offered to the public as surplus land. Additionally, the County is working with the cities of Leesburg and Eustis to provide support for the implementation of their individual infill development projects.

Discussion

Lake County also administers the Housing Choice Voucher Program (Section 8) under which \$3,058,526 is utilized annually to provide rental subsidies to low income households in Lake County. In addition, Permanent Supportive housing funding in the amount of \$97,857 is utilized to help chronically homeless individuals with permanent and supportive housing. Lake County administers 10 Permanent Supportive housing vouchers and partners with Lifestream Behavioral Center to provide the supportive services necessary to maintain independent living. Services include physician/medical services, case management, day treatment, indigent medications, and other necessary supported housing assistance. To be eligible, a person must be eighteen years of age or older, must be homeless (by HUD definition) and disabled. Lake County specifically targets those with serious and persistent mental illness. Eligible clients may also present with co-occurring chronic alcohol or drug abuse. All referrals are received from the Mid-Florida Homeless Coalition and data is tracked through the HMIS system.

As referenced above, the State of Florida State Housing Initiatives Partnership (SHIP) program has awarded Lake County \$1,404,582 which is targeted to help meet the housing needs of the very low, low, and moderate income households to expand production of and preserve affordable housing, and to further the Housing Element of the local Comprehensive Plan specific to affordable housing. The key elements implemented to address home ownership and preservation of existing homes include: 1st time buyer down payment assistance, home ownership counseling, owner occupied rehabilitation, and demolition and replacement. An expanded strategy under SHIP includes rental development of affordable residential multifamily rental units. To help address homeless households or near homeless households, the County offers rental assistance for homeless households and security and utility deposit assistance for utilities and rent.

Annual Goals and Objectives

AP-20 Annual Goals and Objectives

Goals Summary Information

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
1	Housing Improvements	2015	2019	Affordable Housing Homeless	Leesburg Minneola Umatilla Unincorporated Lake County Tavares	Affordable Housing	CDBG: \$744,000	<ul style="list-style-type: none"> • Homeowner Housing Added: 23 Housing Units • Homeowner Housing Rehabilitated: 15 Housing Units • Rental units added: 20 Housing Units
2	Quality of Life	2015	2019	Non-Housing Community Development	Umatilla Minneola Unincorporated Lake County Tavares	Public Facilities and Infrastructure	CDBG: \$784,624	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 3741 Persons Assisted
3	Administration	2015	2019		Leesburg Groveland/Mascotte Minneola Umatilla Unincorporated Lake County Tavares		CDBG: \$256,939	Other: 1

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
4	Public Services	2015	2019	Public Housing Non-Homeless Special Needs	Leesburg Groveland/Mascotte Minneola Umatilla Unincorporated Lake County Tavares Eustis	Public Services	CDBG: \$179,709	Public service activities for Low/Moderate Income Housing Benefit: 1,210 Persons Assisted

Table 6 – Goals Summary

Goal Descriptions

1	Goal Name	Housing Improvements
	Goal Description	Provide emergency repairs for low/mod families to assist in extending the life of the home and create/maintain a suitable living environment. Provide mobile home replacements for families living in dilapidated mobile homes to improve the quality of living and create a suitable living environment. Provide mobility ramps and removal of architectural barriers for persons with a physical disability.
2	Goal Name	Quality of Life
	Goal Description	Working with our Urban County Partners to create neighborhood center, improve a community center, road improvements, and access to sewer.
3	Goal Name	Administration
	Goal Description	Administration and planning for program.
4	Goal Name	Public Services
	Goal Description	Provide for a community healthcare worker to assist persons with language barriers and other high risk populations' access mainstream resources for the primary benefit of health and wellness.

Projects

AP-35 Projects – 91.220(d)

Introduction

The following section outlines the proposed projects and activities to be accomplished in FY 2018. Each project includes Consolidated Plan goal(s) to be supported and priority needs to be addressed by the proposed project and associated activities, as well as its funding source, target completion date, and estimated number of persons or households to benefit from the proposed activities.

Projects

Administration	\$ 256,939
Public Service: Community Health Worker	\$ 69,708
Minneola Water line replacement	\$ 200,000
Tavares Nature Park – Observation Dock	\$ 200,000
Forward Paths - Youth Transitional Housing in Eustis	\$ 150,000
Life Stream - Permanent Supportive Housing in Eustis	\$ 110,000
Habitat for Humanity of Lake and Sumter - Tavares Cottage Community	\$ 119,000
Shepherd’s Village Community Senior Housing Development	\$ 450,000
Housing programs - emergency rehabilitation	\$ 175,000
Umatilla Senior Center	\$ 94,624
Sorrento Park	\$ 140,000

Table 7 - Project Information

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

Lake County's housing stock consists of a high percentage of mobile homes and low value owner-occupied homes. Mobile homes account for 37% of all housing units in unincorporated Lake County. Owner occupied homes valued at \$50,000 or less represent 24% of the county's housing stock. According to the US Census Bureau, there are 3,760 housing units build prior to 1950 with 26% of the estimated population of children residing in those units.

A key obstacle to addressing the underserved needs is that the need far outweighs the available funding.

In identifying priorities, the County uses a ranking system to determine needs as low, medium, high, or no need. In ranking needs within the community, the County takes into consideration information from the Needs Assessment, Lake County Housing Element – Data, Inventory & Analysis – Planning Horizon 2030, Housing Market Analysis, citizen participation process and agency consultation.

AP-38 Project Summary
Project Summary Information

1	Project Name	Administration
	Target Area	
	Goals Supported	Administration and Planning
	Needs Addressed	
	Funding	CDBG: \$ 256,939
	Description	Staff, public information, reporting, and program management
	Target Date	10/01/2019
	Estimate the number and type of families that will benefit from the proposed activities	NA
	Location Description	2008 Classique Lane., Tavares, FL 32778
	Planned Activities	Administration
2	Project Name	Community Health Care Coordinator (CHW)
	Target Area	Leesburg Groveland/Mascotte Minneola Umatilla Unincorporated Lake County Tavares
	Goals Supported	Quality of Life Public Services
	Needs Addressed	Public Services
	Funding	CDBG: \$69,709
	Description	Provide support for a community healthcare outreach worker to provide assistance to high risk families and families with language barriers in accessing healthcare, financial, and food assistance.
	Target Date	9/30/2019
	Estimate the number and type of families that will benefit from the proposed activities	Assist at least 1200 families annually.
	Location Description	Countywide

	Planned Activities	Provide support for a community healthcare outreach worker to provide assistance to high risk families and families with language barriers in accessing healthcare, financial, and food assistance.
3	Project Name	Emergency Home Repair
	Target Area	Leesburg Groveland/Mascotte Minneola Umatilla Unincorporated Lake County Tavares
	Goals Supported	Housing Improvements
	Needs Addressed	Affordable Housing
	Funding	CDBG: \$175,000
	Description	Provide emergency repairs for low/mod families to a minimum of ten homeowners this year.
	Target Date	9/30/2019
	Estimate the number and type of families that will benefit from the proposed activities	A minimum of 15 families will be assisted.
	Location Description	To be Determined
	Planned Activities	Housing rehabilitation
4	Project Name	Minneola Water Line Replacement
	Target Area	
	Goals Supported	Infrastructure Improvements
	Needs Addressed	Infrastructure
	Funding	CDBG: \$200,000
	Description	Replacement of water line in targeted areas to improve water reliability and remove asbestos piping to improve water quality.
	Target Date	9/30/2019
	Estimate the number and type of families that will benefit from the proposed activities	There are 98 homes in the targeted area CT: 313.09, BG 2

	Location Description	Improve water service to residents of Minneola St, Pear St., Rose Ave., Bloxam Ave., Oakland Ave., Alexandra Ave., Galena Ave., Osceola St., Chester St., Sumter St. and Washington Street For IDIS: 205 E. Pearl St. Minneola FL 34715
	Planned Activities	Replacement of Water Line
5	Project Name	Tavares Nature Park - Observation Dock
	Target Area	
	Goals Supported	Public Facility Improvements
	Needs Addressed	Public Facilities
	Funding	CDBG: \$200,000
	Description	Replacement of dock with ADA compliant facility. The dock was destroyed in the flooding and must be replaced.
	Target Date	9/30/2019
	Estimate the number and type of families that will benefit from the proposed activities	CT: 308.06, BG 1 889 disabled persons (26.3% of the CT)
	Location Description	Tavares Nature Park 1551 Milwaukee Ave. Tavares, FL
	Planned Activities	Reconstruction of Dock construction
6	Project Name	Forward Paths Youth Transitional Housing
	Target Area	
	Goals Supported	Homelessness
	Needs Addressed	Homeless
	Funding	CDBG: \$150,000
	Description	Eustis
	Target Date	9/30/2019
	Estimate the number and type of families that will benefit from the proposed activities	5 youth
	Location Description	101 E. Woodward Ave. Eustis FL
	Planned Activities	Acquisition of property and structures to provide housing for homeless youth.

7	Project Name	Life Stream - Permanent Supportive Housing
	Target Area	
	Goals Supported	Public Service
	Needs Addressed	Homelessness
	Funding	CDBG: \$110,000
	Description	Staffing and case management for Permanent Supportive Housing for homeless individuals
	Target Date	6/30/2019
	Estimate the number and type of families that will benefit from the proposed activities	8 bed permanent supportive housing
	Location Description	24 Grove St. Eustis FL 32726
	Planned Activities	Public Services
8	Project Name	Habitat for Humanity of Lake and Sumter - Tavares Cottage Community
	Target Area	
	Goals Supported	Affordable Housing
	Needs Addressed	Affordable Housing
	Funding	CDBG: \$119,000
	Description	Multiyear funding commitment to provide infrastructure including roads and utilities to support construction of 23 affordable housing units. Remaining infrastructure cost will be paid for by Habitat and reimbursed upon receipt of the 2 nd year of funding. Total funds required \$240,000.
	Target Date	6/23/2019
	Estimate the number and type of families that will benefit from the proposed activities	A total of 23 homes will be built in phases over a 3 year period.
	Location Description	1410 County Drive, Tavares FL
	Planned Activities	Construction of infrastructure to support new housing construction

9	Project Name	Shepherd's Village Community Senior Housing Development
	Target Area	
	Goals Supported	Affordable Housing
	Needs Addressed	Affordable Housing
	Funding	CDBG: \$450,000
	Description	The Shephard Village Community Inc., plans to construct 20 affordable housing units for the elderly in Phase I. A Multiyear funding commitment of CDBG funds will be dedicated to Phase I
	Target Date	6/30/2020
	Estimate the number and type of families that will benefit from the proposed activities	Phase I consists of 20 units
	Location Description	Flatswood Road Leesburg 34748
	Planned Activities	Special project by a Community Based Development Organization
10	Project Name	Umatilla Community Center
	Target Area	
	Goals Supported	Public Facility Improvements
	Needs Addressed	Public Facilities
	Funding	CDBG: \$94.624
	Description	Construction of an addition to the Senior Center to create new activity space.
	Target Date	9/30/2019
	Estimate the number and type of families that will benefit from the proposed activities	An estimated 1200 senior will benefit from the project.
	Location Description	17107 Ball Park Road Umatilla
	Planned Activities	Rehabilitation of facility
11	Project Name	Sorrento Park
	Target Area	

Goals Supported	Public Facility improvements
Needs Addressed	Public Facilities
Funding	CDBG: \$140,000
Description	Acquisition of property to add to existing park.
Target Date	09/30/2019
Estimate the number and type of families that will benefit from the proposed activities	CT: 309.12 BG: 1 1549 People, 75.73 % low mod
Location Description	31535 Church Street, Sorrento, FL, 32776
Planned Activities	Acquisition of land for park

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

Lake County and its Urban County Partners, which include the Cities of Tavares, Leesburg and Minneola, receive CDBG funding. The Cities of Eustis and Groveland receive their own allocations of CDBG dollars through the State of FL Small Cities CDBG program. All funds expended by Lake County in the unincorporated areas and the participating cities are targeted toward low-income areas, many of which have a high minority population percentage. The City of Leesburg has the highest percentage of minority population within the targeted low mod census tracts as illustrated on the following maps. (Maps are in the Unique Appendices in IDIS.) The Cities of Leesburg, Eustis, and Groveland primarily fund activities benefitting census tracts 305.03 and 306.02 (Leesburg), 302.06 (Eustis) and 312.04 (Groveland) of which each have above average levels of minorities and/or low income residents.

Geographic Distribution

Target Area	Percentage of Funds
Leesburg	28
Groveland/Mascotte	1
Minneola	12
Umatilla	17
Unincorporated Lake County	6
Tavares	20
Eustis	16

Table 8 - Geographic Distribution

Rationale for the priorities for allocating investments geographically

There are two census tracts considered minority concentration areas (more than 50% minority representation) for Lake County and the two areas are located respectively within the city limits of Eustis and Leesburg. The census tracts are 302.06 (53% minority), 305.03 (50% minority). Some of Lake County's CDBG funds are expended within the unincorporated areas of Lake County on public facilities for agencies or services that would increase the quality of living for those residents. The Cities of Eustis and Groveland receive CDBG dollars through the Florida Small Cities program.

Affordable Housing

AP-55 Affordable Housing – 91.220(g)

Introduction

In FY 2018, Lake County will improve the housing stock using CDBG funds by providing housing emergency repairs, mobile home replacements, and mobility ramps. In addition, the County will provide housing rehabilitation assistance, purchase assistance, and demolition/construction of housing with State of FL SHIP funds. All recipients must complete the application process and meet income requirements. Homeowners are served on a first come first ready basis.

One Year Goals for the Number of Households to be Supported	
Homeless	12
Non-Homeless	120
Special-Needs	40
Total	172

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

One Year Goals for the Number of Households Supported Through	
Rental Assistance	12
The Production of New Units	20
Rehab of Existing Units	20
Acquisition of Existing Units	0
Total	52

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

Discussion

Lake County will also utilize SHIP funding to partner with agencies to create 12 additional affordable housing units through the development of a multifamily residential low income senior housing community; operate the REACH program to assist 120 persons at risk with accessing housing with utility and security deposits, and provide rental subsidy for up to 12 homeless families.

AP-60 Public Housing – 91.220(h)

Introduction

The Eustis Housing Authority manages approximately 2,142 subsidized rental units, including USDA units in two developments as well as continuing to manage approximately 485 vouchers. The Lake County Housing Authority is the only agency in the County to receive Section 8 housing assistance program funding. The purpose of the Housing Choice Voucher Program is to promote adequate and affordable housing, economic opportunity, and a suitable living environment free from discrimination. Rents associated with the federal developments are in accordance with HUD regulations and are 30% of the total income of the household. This is monitored through a yearly income verification to determine any income changes. Eligible applicants are those whose income is within the limits as determined by HUD.

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

Lake County will continue to support and work cooperatively with the Eustis Housing Authority to ensure their clients remain in compliance in order to maintain their affordable housing.

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

The Lake County Housing Authority is managed by Lake County Housing and Community Development (H&CD) and has implemented a program to increase self-sufficiency of families receiving services through the Section 8 program. This program is designed to assist the parents and children with developing personalized goals, such as educational, vocational, or homeownership and coordinate services to help those families achieve the desired goals. Lake County Housing Authority implemented its first project- based voucher program in partnership with the City of Leesburg and LifeStream Behavioral Center, Inc. to introduce value added enhancements to the subsidized housing assistance available to the participants. These services include but are not limited to life skills classes, parenting classes, homeownership classes, youth summer job club, rental and utility assistance, credit counseling, college outreach, and homeownership counseling.

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

Lake County will attempt to verify that the Eustis PHA is not troubled by researching public records within the County Clerk's public documents database and the State's regulatory agencies. Any assistance provided by Lake County to the clients' of the PHA will be done so within the limits of available funds and/or services.

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

Introduction

As reported by the Mid Florida Homeless Coalition January 2017 Point in Time Count, Lake County had 312 unsheltered individuals, thus confirming that the housing needs of homeless persons and families cannot be completely met by existing emergency shelters and transitional housing due to a lack of capacity. Emergency shelters, transitional housing programs and permanent supportive housing programs have too few beds and are full almost year round with the already homeless or recently homeless population.

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

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

In 2018, the Mid Florida Homeless Coalition will address some of this lack of capacity by utilizing Lake County's SHIP utility and deposit assistance program to move individuals and families who have secured an income and reacquired life skills into their own housing units. Each time Lake County H&CD is able to do this, it frees bed space in a shelter for another needy individual or family to begin the process of coming off the streets and into a future home of their own.

Concurrently, H&CD works with Lake County Community Services to leverage County funds awarded to faith-based agencies and local non-profits for the purpose of supporting the "Open Door" a homeless drop-in facility operated by the county's non-profit mental health provider, LifeStream Behavioral Center. The overarching goal of the "Open Door" is to offer direct assistance to the homeless and to link them to programs and services that help them reintegrate back into society. They provide their clients with immediate needs such as showers, laundry and food, as well as access to healthcare, income benefits, identification, clothing, computers, child care, employment and housing resources.

Addressing the emergency shelter and transitional housing needs of homeless persons

Lake County H&CD continues to search for resources from other sources to help move individuals and families out of homelessness. During 2017, H&CD funded and supported an additional 20 transitional housing beds to assist with housing homeless families. An existing significant identified and unmet need is for additional housing for homeless families that does not require separation of the family unit during this period in their lives. Family sheltering remains problematic, and the larger the family, the more difficult it is with obtaining sheltering without requiring family separation.

Lake County is continuously working with community partners in the effort to create additional

transitional beds.

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

Lake County H&CD has established a homeless prevention strategy in its Local Housing Assistance Plan to assist individuals and families who are currently homeless or at-risk of becoming homeless with utility and rental assistance for up to one year. The purpose of the program is to decrease at-risk families from becoming homeless and/or to assist families to be able to transition from homelessness or hotel/motel housing or “house-couching” into permanent affordable housing. The goal of this program is to relieve these individuals and families of the financial burden of paying for housing and utilities for up to one-year to allow them to gain self-sufficiency by obtaining and maintaining training, education and/or stable employment.

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.

With the advent of the Continuum of Care (CoC) Coordinated Intake, Assessment and Referral System it should become easier for extremely low income families and individuals to access the services needed to avoid becoming homeless. The CoC has several agencies that can provide assistance on a one-time basis to very low income families and individuals who have suffered a non-recurring hardship and will be financially sustainable and able to remain housed after receiving assistance. However, long term assistance of this type is severely limited. Lake County H&CD is expected to be re-funded through the CoC to support 15 households in the Shelter Plus Care Program. Shelter Plus Care is designed to promote permanent housing with supportive service to persons with disabilities coming from the streets and emergency shelters. Lake County H&CD has partnered with LifeStream Behavioral Center to develop 35 units of affordable housing, 50% of which will be earmarked to assist clients with disabilities meeting the criteria for Shelter Plus Care services.

Providing services to those being discharged from publicly funded institutions and system of care (health care facilities, mental health facilities, foster care and other youth facilities and corrections programs and institutions) is difficult since these institutions are not funded for assisting these individuals and

their families. Faith-based organizations have stepped forward to help assist those in need, but it remains to be seen if the additional assistance and resources they can provide will fill the gaps.

The Mid Florida Homeless Coalition has continued to expand the CoC for the homeless and near homeless by placing the Coordinated Intake, Assessment and Referral System on-line thus putting all available resources under a single contact point, optimizing their resources and better serving Lake County residents.

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

Introduction:

The Lake County Affordable Housing Advisory Committee (AHAC) was formed by the Lake County Board of County Commission by Resolution 1992-11 on November 24, 1992. Pursuant to Chapter 420.9706 F.S. and Board of County Commissioners, the AHAC is made up of appointed and ad hoc members representing a cross-section of the affordable housing development community. Chapter 420.9706 F.S. requires the establishment of an affordable housing advisory committee to recommend monetary and nonmonetary incentives as part of an affordable housing incentive plan. All AHAC meetings are advertised as required by the Sunshine Law and open to the public. In addition to the hours spent together at these meetings, AHAC members spent many additional hours reviewing materials including studies and reports from other jurisdictions for the purpose of developing recommendations for the County Commission to consider.

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 AHAC is vested in continuing to serve as an active board by helping to draft implementing legislation and by continuing to monitor the demand for affordable housing and the ability of, and restrictions on, the development community in meeting those needs. Recommendations include:

- Eliminate or reduce impact and development fees for new construction to households at or below 80% MFI,
- Establish a separate fund to assist with the cost of school, water & sewer fees for housing to families at or below 80% MFI;
- Establish a lien mechanism to recapture these fees if the house is sold within 10 years;
- Waive property taxes on land donated to non-profit organizations for five years with the requirement that the property must be developed for affordable housing within that time period; and
- Create a new zoning classification specifically for affordable housing that allows development on 40' lots.

Further, to assist in reducing barriers to affordable housing, the County has implemented various programs targeted towards low-and moderate-income households. The County creates homeownership opportunities, brings homes up to code through rehabilitation efforts, and demolishes and replaces homes when necessary. These programs also assist in eliminating barriers to affordable housing by providing economic opportunities and minimizing overall household expenses. The County also will update its Analysis of Impediments to Fair Housing Choice. In addition to the activities undertaken by the County, the Cities of Eustis and Leesburg are working in tandem with the County to acquire and

donate lots for infill development for affordable housing activities.

AP-85 Other Actions – 91.220(k)

Introduction:

There are various elements that produce obstacles to meeting needs within the community. Addressing all housing, homeless, and community developments needs is an impossible task due to restricted funding. However, the County utilizes all possible resources and continues to seek leveraging sources to meet as many underserved needs as possible. The current housing market and economic environment also serve as barriers to meeting needs. The lack of high wage jobs adds to the number of families and individuals needing access to services, and many times the capacity to fund and implement existing or additional programs is limited. Also, the Cities of Leesburg and Eustis have identified land in high risk neighborhoods that can be utilized to construct affordable housing. The County and its Urban County Partners will continue to utilize CDBG funds to the fullest extent to assist in meeting underserved needs. Leveraging efforts with public and private funding agencies will also be made to supplement federal funds and increase the resources available to address community needs.

Actions planned to address obstacles to meeting underserved needs

The major obstacle to meeting underserved needs is inadequate resources. The jurisdiction receives Supportive Housing Program funds, Federal Emergency Management Agency (FEMA) funds and financial resources from the Florida State Department of Children and Families to assist Lake County residents with rent and utility assistance. These funding sources can only address a small portion of the homeless needs in the County. With dramatic cuts in state funding and decreases in private donations, local non-profit homeless service providers are having a difficult time meeting the needs of the growing homeless population. In addition, programmatic requirements for other HUD competitive grants do not always coincide with determined local needs.

However, Lake County continues to work with agencies to build support and advocacy for needy populations and areas that are underserved. The County will continue to focus the funding efforts on populations and areas of high need.

Actions planned to foster and maintain affordable housing

Lake County continues to foster and maintain relationships with non-profits and developers to increase affordable housing opportunities.

Actions planned to reduce lead-based paint hazards

Lake County consults with the Lake County Health Department to review lead data, educate the public and mitigate housing units in which lead has been found. From 2010-2014 there were 19 confirmed cases of lead poisoning in Lake County, two of which were acquired out of state. Of the 19 confirmed cases, eight were for persons under the age of 18. According to the U.S. Census Bureau, in Lake County

there are 3760 housing units built prior to 1950, with 26% of the estimated population of children residing in those units. Property statistic reports are pulled for all housing projects to determine year of construction. If the year is 1978 or prior, an inspector certified in lead paint assessment completes the testing for the presence of lead and provides the homeowner with the EPA Lead Awareness brochure. To date, none of the housing projects in Lake County have tested positive for lead.

All rehabilitation activities follow HUD regulations concerning lead-based paint assessment and interim controls if necessary. The first step is counseling, informing the rehabilitation client of the danger of lead-based paint when they apply for assistance. Staff determines at this interview whether there is heightened risk due to young children in the household.

Actions planned to reduce the number of poverty-level families

The County recognizes the interrelationship between housing and economic opportunities and the need to pursue both in order to assist households with attaining self-sufficiency. The County also recognizes that it has defined priority strategy areas, housing and economic development are not separate or isolated strategies. The County believes these strategies are inter-related, and they impact, reinforce and contribute to each other to achieve the common goal of a viable, vibrant community.

The health of the County, its special needs populations and the community at large cannot be artificially separated as they are an integral part of the whole. The betterment and improvement of any part inevitably contributes to the betterment of the other segments of the community. The County believes the implementation of the housing and neighborhood revitalization activities outlined in the Consolidated Plan will help reduce the number of households in poverty. All of the programs outlined in the Consolidated Plan are intended to provide benefits to Lake County residents who are considered low income and/or fall below the federal poverty level.

The County is committed to alleviating the effects of poverty among its residents. The County recognizes that it may not be possible to end poverty all together but is dedicated to better understanding its causes and finding a way to reverse the cycle of poverty. The County, the Community Action Agency, and the City of Leesburg Community Redevelopment Area (CRA) provide housing rehabilitation to assist in maintaining affordable housing and reducing household costs. Programs are coordinated when possible to assist in reducing poverty and to continue support of subsidized housing providers incorporating programs and services that promote tenant transition to self-sufficiency. Various federal, state, and local agencies are engaged to leverage funding sources for the development of economic opportunities when possible.

Actions planned to develop institutional structure

Lake County's Consolidated Plan will be carried out through a combination of public, private and non-profit organizations, many of which participate in the citizen participation process. The County staff will continue to play active roles in supporting local non-profit organizations dealing with homelessness –

Mid Florida Homeless Coalition – children’s issues – Children’s Services Council – mental health – LifeStream Behavioral Center, Inc. – Veterans Services and Elder Affairs. The Lake County H&CD Division will continue to partner with CHDOs, Veterans Services, the Mid Florida Homeless Coalition, Housing in Partnership, USDA, Habitat for Humanity, Florida Specs, and other local non-profits on affordable housing projects.

The H&CD Division will consult with the Eustis Housing Authority concerning consideration of public housing needs and any planned grant program activities. This consultation will ensure and provide a better basis for the certification by the Lake County Board of County Commissioners that the Consolidated Plan is consistent with the County’s assessment of low-income housing needs. This type of consultation will help insure that any proposed activities that are directed towards increasing affordable housing, neighborhood improvement and any program or services funded by the Eustis Housing Authority that will increase the quality of life are in sync with the efforts of all participating parties. Those funded programs covered by the Consolidated Plan will be fully coordinated to achieve comprehensive community development goals. Both the County and cities will continue to seek additional funding sources for housing and community development activities when possible.

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

Several steps are taken to ensure coordination between public and private housing and social service agencies during the program year. Each of these steps will help facilitate information exchange among the County, cities, and those providing public services. A technical assistance workshop is held at the beginning of each grant year to educate the County’s Urban County Partners on the grant funds, application process, eligible uses, and additional requirements when utilizing these funds and long-term conditions on their use.

Additionally, the County’s Human Services grant program collaborates and coordinates with H&CD to identify the self-sufficiency areas most in need so that public funds can be targeted by the County’s non-profits to assist those most in need.

Program Specific Requirements

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

Introduction:

Community Development Block Grant Program (CDBG)

Reference 24 CFR 91.220(I)(1)

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

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

Other CDBG Requirements

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

Low and moderate income benefit percentage (100%) covers FY 2018.

Attachments

Citizen Participation Comments

Grantee Unique Appendices

Grantee SF-424's and Certification(s)