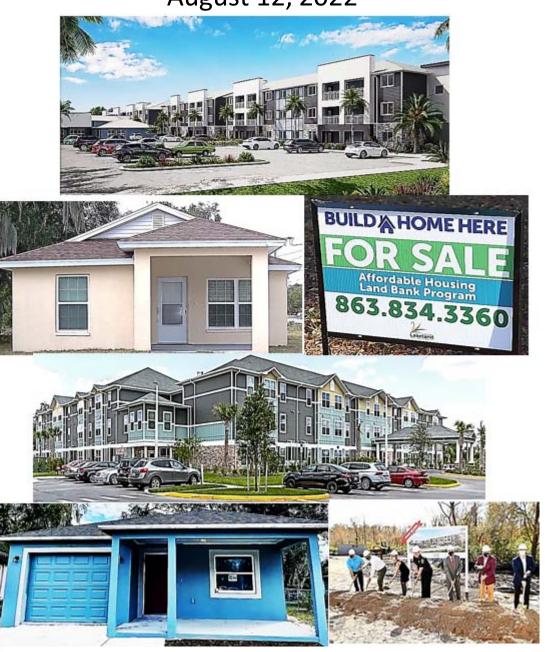


# Community & Economic Development Housing Division

One Year Action Plan FY 2022-2023 August 12, 2022





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## **Executive Summary**

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

#### 1. Introduction

The City of Lakeland is awarded federal formula funds annually from the U. S. Department of Housing and Urban Development (HUD), the funds are administered by the Community and Economic Development Department – Housing Division. As a condition of awarding these funds, the City is required each year to develop a one-year Action Plan that outlines the community development goals on which it will focus these funds. This Plan covers the period of October 1, 2022 through September 30, 2023. During this period, the City has been awarded the following Federal Formula funds:

- Community Development Block Grant (CDBG)
- HOME Investment Partnerships Program (HOME)
- Housing Opportunities for Persons with AIDS (HOPWA)

The Plan identifies community needs, initiatives to address those needs, and is structured in a format that will help to measure performance.

The City of Lakeland's Housing Division (Division), under the general direction of the Community and Economic Development Department, is the lead agency for preparing and implementing the Plan. The Housing Division administers Community Development Block Grant (CDBG) and Home Investment Partnerships (HOME). The City of Lakeland declined to act as the Lead Agency to administer federal Housing Opportunities for Persons with AIDS (HOPWA) Program funds for the Lakeland/Winter Haven EMSA (Polk County). Rather, the City of Lakeland re-designated the State of Florida as the Lead Agency to act as the grantee and recipient of HOPWA funds for services on behalf of HIV/AIDS clients in Lakeland/Winter Haven EMSA (Polk County).

#### 2. Summarize the objectives and outcomes identified in the Plan

This plan includes activities carried out by the City of Lakeland. The objectives and goals of the Five-Year Consolidated Plan are to:

# Objective #1: Provide affordable, safe, decent housing Outcomes

- Preserve and maintain affordable housing by correcting substandard housing conditions.
- Increase homeownership opportunities for low to moderate income individuals through affordable home construction and down payment assistance.
- Increase rental housing units through partnerships with the public housing authority and private sector investors; and

 Assist in the provision of affordable housing to persons and/or families at risk of becoming homeless and those who are homeless.

# Objective # 2: Establish and maintain a suitable living environment Outcomes

- Enhance and support programs that promote the safety and livability of neighborhoods including education and guidance on minimum code and housing standards.
- Improve housing and neighborhood conditions for homeowners and renters through code enforcement actions to seek compliance.
- Support the expansion and improvements of infrastructure such as streets, sidewalks & sewer; and
- Increase access to quality facilities and public services.

#### Objective # 3: Expand economic opportunities

#### **Outcomes**

- Empower low-income persons to achieve financial self-sufficiency.
- Support programs that create economic opportunities by creating jobs to low-income persons in areas affected by those programs and activities covered by the Plan.

As the City of Lakeland continues to work toward addressing the needs of the local community, there is a high demand for funding to address other national priorities. Like other HUD grant entitlements, the City of Lakeland is faced with providing more services to a growing population and a reduction in local and state resources.

#### 3. Evaluation of past performance

In the previous five years, the City of Lakeland has shown major progress in its efforts to implement its programs. The City follows HUD regulations and continues to deliver housing and community development services in an efficient manner.

The City has successfully funded housing preservation and production through housing rehabilitation program by repairing homes and reconstructing homes on the same lot, as well as rental construction. The funds also assisted with Code Enforcement efforts and public services activities. The City has facilitated affordable housing units for homebuyers through its down payment assistance program.

The City was successful in implementing these programs in the past and anticipates the continuation of such programs in the future. The City will use CDBG and HOME funds to make these programs worthy and to meet the goals and objectives identified in the Consolidated Plan.

#### 4. Summary of Citizen Participation Process and consultation process

The City of Lakeland is required by the U.S. Department of Housing and Urban Development (HUD), pursuant to 24 CFR 91.105, to have a detailed Citizen Participation Plan that contains the City's policies and procedures for public involvement in the Consolidated Plan process and use of Community Development Block Grant (CDBG) and HOME Investment Partnerships (HOME) funds. The citizen participation plan is an important part of the five-year Consolidated Plan and may be amended over the life of that plan.

The process of developing and implementing the Consolidated Plan is broken into several different phases: development, amendments, and performance reporting. The citizen participation process is integrated into each of these phases.

The City strives to keep all interested parties informed about the opportunities for involvement in each phase of the Consolidated Plan process, including opportunities to comment on all proposed Consolidated Plan submissions to HUD, any substantial amendments and the Consolidated Annual Performance and Evaluation Report (CAPER).

#### 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.

No comments received

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

All Comments were accepted and directed to the relevant city departments to be addressed. All comments relative to the One Year Action Plan were incorporated in the document.

#### 7. Summary

N/A

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

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

Describe the agency/entity responsible for preparing the Consolidated Plan and those responsible for administration of each grant program and funding source.

Agency Role	Name	Department/Agency
CDBG Administrator	LAKELAND	Community and Economic
		Development/Housing Division
HOME Administrator	LAKELAND	Community and Economic
		Development/Housing Division

Table 1 – Responsible Agencies

#### **Narrative**

The City of Lakeland's Housing Division (Division), under the general direction of the Community and Economic Development Department, will be the lead agency for preparing and implementing the Plan. The Division coordinates its planning efforts among many local partner organizations to ensure that the goals outlined in the plan are met in a manner consistent with the stated performance measures.

As part of the Plan development process, input on housing, community development and support service needs, issues and initiatives were solicited from citizens and organizations. The Division continues to create partnerships with non-profit developers, Community Housing Development Organizations (CHDOs), developers, social service providers, and other units of local government to expand the City's ability to provide affordable housing and community development programs.

The Division also obtained information on housing and community development needs and issues through participation of housing advocacy groups and support service organizations, including the Affordable Housing Advisory Committee, the Homeless Coalition of Polk County and the Polk County Department of Health provided information on people with HIV/AIDS and lead based-paint poisoning, neighborhood associations, representatives of health and human services agencies. The City of Lakeland worked with the Lakeland Housing Authority and other housing and support service organizations on grant applications, plan compliance reviews and the certification of consistency process.

Planning presentations were conducted with focus groups such as the Affordable Housing Advisory Committee and was engaged with other community meeting and networks. Public meetings and hearings were held to obtain input from citizens and community leaders in preparing the Consolidated Plan for 2021 to 2025. A list of the organizations contacted is included in Table 2.

The Staff also regularly attends and participates with groups such as Homeless Coalition of Polk County and Mid-Town Community Redevelopment Agency to improve methods of delivery and initiate systematic improvements in certain service sectors.

#### **Consolidated Plan Public Contact Information**

Housing Division 1104 Martin L. King, Jr. Avenue Lakeland, FL 33805 863/834-3360 www.housing@lakelandgov.net

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

#### 1. Introduction

The Division under the general direction of the Community and Economic Development Department will be the lead agency for preparing and implementing the Plan. The Division coordinates its planning efforts among many local partner organizations to ensure that the goals outlined in the plan are met in a manner consistent with the stated performances measures.

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

The City is committed to the coordination of all its programs with other City departments, local nonprofits and the private sector. City staff will continue to participate in events and planning sessions of the local housing authority, private housing developers and health and social service agencies.

The City has an ongoing relationship with the Lakeland Housing Authority (LHA). The City also supports the LHA Youth Build project. The City provides several health and social service agencies with CDBG and City general funds through the public/community service application process.

A summary of the comments/findings from group participants can be found in Appendix B.

A few other examples of the City's activities intended to enhance coordination include the following:

- Staff member attends Homeless Coalition of Polk County meetings.
- Participates with Homeless Point in Time Committee.
- Staff member participates with the Florida Community Development Association.
- Staff coordinates affordable housing goals with Polk County Housing & Neighborhood Services;
   and
- As part of its work to affirmatively further fair housing, the Staff coordinated efforts with the Central Florida Regional Planning Council to create its Impediments to Fair Housing Choice report.

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 City's strategy for addressing chronic homelessness includes working with providers of emergency housing, transitional housing, and permanent housing for the homeless in Lakeland. Exhibit 1 of the Continuum of Care may be viewed at **www.polkhomeless.org**.

The HCPC coordinates with homeless service providers to circulate information regarding grants and funding available through HUD for permanent housing and transitional living programs. The Coalition is

the organizing agency in the development of Exhibit 1 of the Grant Application for the McKinney-Vento Act Funds. The Coalition has successfully sought grant funds for the Continuum of Care, State of Florida and the Department of Children and Families. The Coalition works closely with Department staff to further assist the homeless or persons threatened with homelessness. These grant funds have been distributed to member agencies that applied for funds through the Homeless Coalition of Polk County.

City staff works closely with the Homeless Coalition's Director. The City continues to participate as a member and on various committees in support of the Homeless Coalition of Polk County, Inc. Additional support to existing programs is given each year by awarding public services and community services grants to support the Coalition and local member organizations.

The City has long supported and will continue to give preference to projects that develop permanent supportive housing units that serve special needs populations. Development of several multi-family rental apartments was led by the City to prevent families from becoming homeless. The City also supports the Coordinated Entry Process.

Lack of funds to end chronic homelessness is one of the largest barriers to success. The current inventory of emergency and transitional housing shelter beds is mainly in the Lakeland corporate area; but facilities are available in other parts of Polk County Continuums of Care area. Similar statistics exist in regard to Persons in Families with Children with the majority of the beds for families with children located in Lakeland.

The Polk County Continuum of Care is also making more of an effort to identify the geographic locations from which the homeless originate in Polk County. Recent homeless surveys identified previously uncounted homeless in County areas outside of Lakeland. Therefore, it seems logical to conclude that shelter capacity will be developed in other areas of the County. If other areas of Polk County develop shelter capacity, it appears possible that the number of Polk County residents served in Lakeland will decline.

In today's economy, HCPC and other agencies are seeing more families with children seeking affordable housing. The City in partnership with homeless providers, local housing authority and affordable housing developers seek methods of assisting extremely low and very low-income people. Wages have not kept pace with the cost of housing and utilities for the families that are low income. The City partners with Lakeland Habitat for Humanity, Keystone Challenge Fund (CHDO) and the Lakeland Housing Authority and other affordable housing developers.

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

The City of Lakeland does not receive or administer the Emergency Shelter Grant.

# 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

1	Agency/Group/Organization	Homeless Coalition of Polk County
	Agency/Group/Organization Type	Services-homeless
	What section of the Plan was addressed by Consultation?	Homelessness Strategy
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Meet with agency on monthly basis to discuss the challenges of homeless issues. Will continue to discuss ways on improved performance.
2	Agency/Group/Organization	Housing and Neighborhood Development Services of Central Florida, Inc.
	Agency/Group/Organization Type	Housing
	What section of the Plan was addressed by Consultation?	Housing needs assessment
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Communicated with agency on a regular basis to discuss affordable housing concerns. Will forward consolidated plan to agency to continue discussion on improved performance.
3	Agency/Group/Organization	Lakeland Housing Authority
	Agency/Group/Organization Type	PHA

How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?  Agency/Group/Organization Mid-Town Community Redevelopment Agency  Agency/Group/Organization Type  What section of the Plan was addressed by Consultation?  How was the Agency/Group/Organization Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?  Agency/Group/Organization City Commission/Mayor's Office  Agency/Group/Organization Type  What section of the Plan was addressed by Consultation?  City Commission/Mayor's Office  Agency/Group/Organization Type  What section of the Plan was addressed by Consultation?  Group discuss affordable housing programs during budget meetings.  Group discuss affordable housing programs during budget meetings.		What section of the Plan was addressed by Consultation?	Rental strategy
Agency/Group/Organization Type  What section of the Plan was addressed by Consultation?  How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?  Agency/Group/Organization  City Commission/Mayor's Office  Other Government - Local  Housing Need Assessment Strategic Plan  How was the Agency/Group/Organization Consulted and what are the anticipated outcomes of the consultation or areas for improved		Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved	LHA staff attended Stakeholder meeting.
What section of the Plan was addressed by Consultation?  How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?  5 Agency/Group/Organization City Commission/Mayor's Office  Agency/Group/Organization Type Other Government - Local  What section of the Plan was addressed by Consultation?  How was the Agency/Group/Organization Consulted and what are the anticipated outcomes of the consultation or areas for improved  City Commission/Mayor's Office  Housing Need Assessment Strategic Plan  Group discuss affordable housing programs during budget meetings.	4	Agency/Group/Organization	Mid-Town Community Redevelopment Agency
addressed by Consultation?  How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?  Agency/Group/Organization Agency/Group/Organization Type  What section of the Plan was addressed by Consultation?  How was the Agency/Group/Organization City Commission/Mayor's Office  Other Government - Local  Housing Need Assessment Strategic Plan  How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved		Agency/Group/Organization Type	Economic Development
Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?  Agency/Group/Organization  City Commission/Mayor's Office  Agency/Group/Organization Type  Other Government - Local  What section of the Plan was addressed by Consultation?  Housing Need Assessment Strategic Plan  How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved			Community Development Needs
Agency/Group/Organization Type  Other Government - Local  What section of the Plan was addressed by Consultation?  How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved  City Commission/Mayor's Office  Other Government - Local  Housing Need Assessment  Strategic Plan  Group discuss affordable housing programs during budget meetings.		Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved	Attend Stakeholder Strategic meetings.
What section of the Plan was addressed by Consultation?  How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved  Housing Need Assessment  Strategic Plan  Group discuss affordable housing programs during budget meetings.	5	Agency/Group/Organization	City Commission/Mayor's Office
addressed by Consultation?  How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved		Agency/Group/Organization Type	Other Government - Local
Agency/Group/Organization meetings.  consulted and what are the anticipated outcomes of the consultation or areas for improved			
Table 2 – Agencies, groups, organizations who participated		Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	meetings.

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

Not applicable

# 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	Homeless Coalition of	HCPC's mission overlaps with the City 's
	Polk County	Strategic Plan and Action Plan goals through
		enhanced coordination between public and
		private social service providers, as well as
		community outreach on issues related to
		homelessness.
City of Lakeland Ten	City of Lakeland	The City's comprehensive plan includes a
Year Comprehensive		housing element with goals of special use for
Plan		development of this Consolidated Plan. The
		housing element includes strategies for
		provision of affordable housing goals. These
		goals align with those in this Consolidated
		Plan, and were important in developing the
		priority needs and strategies
Local Housing	City of Lakeland	The City's Local Housing Assistance Plan
Assistance Plan		(LHAP) includes goals related to affordable
		housing programs identified as priority
		needs in this Consolidated Plan, particularly
		in terms of expanding the supply of
		affordable housing.
Impediments to Fair	City of Lakeland	Actions to address impediments identified in
Housing Choice		the AI are incorporated in the Action Plan
City of Lakeland CRA	City of Lakeland	Goals do not overlap
Area Plan		
Five Year and Annual	Lakeland Housing	Goals do not overlap
Plans	Authority	
Consolidated Plan	Polk County	Goals do not overlap
	Neighborhood Services	
	Division	

Table 3 – Other local / regional / federal planning efforts

### Narrative (optional)

### 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 City of Lakeland is required by the U.S. Department of Housing and Urban Development (HUD) pursuant to 24 CFR 91.105 to have a detailed Citizen Participation Plan that contains the City's policies and procedures for public involvement in the Consolidated Plan process and use of Community Development Block Grant (CDBG) and HOME Investment Partnerships (HOME) funds. The citizen participation plan is an important part of the five-year Consolidated Plan and may be amended over the life of that plan.

HUD along with the City considers it is important to obtain the views of residents who live in CDBG low-income areas, as well as service providers who deliver services to low income and special needs residents.

# **Citizen Participation Outreach**

Sort O rder	Mode of Out reach	Target of Ou treach	Summary of response/atte ndance	Summary of comments re ceived	Summary of co mments not accepted and reasons	URL (If applica ble)
1	Newspaper/I nternet	Public Service Agencies	February 7, 2022	26 applications received	n/a	
2	Public Meeting	CRA and Consultants	April 20, 2022	Discussion regarding housing in specific redevelopment area	n/a	
2	Newspaper Ad	Non- targeted/bro ad community	April 25, 2022	None	n/a	
3	Public Meeting	Low-income census tract community	May 9, 2022	Infill lot, time to build, Tiny Homes, Public Service funding, Homeless	n/a	
4	Public Meeting	Non- targeted /broad community	May 26, 2022	New Construction Rental	n/a	
5	Public Hearing	Non- targeted/bro ad community	June 20, 2022	No Comments	n/a	
6	Newspaper Ad	Non- targeted/bro ad community	July 11, 2022			
7	Public Hearing	Non- targeted/bro ad community	July 18, 2022			

Table 4 – Citizen Participation Outreach

### **Expected Resources**

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

#### Introduction

The City of Lakeland is awarded an allocation of CDBG funds each year which, for 2022-2023 is \$907,548, and anticipates \$2,500 in program income; partially from NSP3 program income received the city transfer to CDBG and use for eligible activities. The City will transfer program income from NSP3 projects and all future program income to IDIS for CDBG eligible rehabilitation activities. CDBG funds may be used for housing and community development activities including housing rehabilitation, public services, code enforcement, and administration of the City's CDBG program.

The City of Lakeland also is awarded HOME funds in the amount of \$430,231 and anticipates an approximate amount of \$20,000 for program income. The City has added a new strategy with the development of new housing in addition to housing preservation. HOME funds may be used for housing activities such as increasing homeownership, new rental construction and administration of the City's HOME program and CHDO support. The city's General fund and the Community Redevelopment Agency (CRA) funds may be utilized for impact fee reimbursements/waiver for multi-family housing developments.

The CRA has also committed to expend funds for owner occupied rehabilitation, down payment assistance and development of new construction programs in targeted CRA areas.

#### **Anticipated Resources**

Program	Source	Uses of Funds	Expe	cted Amou	nt Available Y	ear 1	Expected	Narrative
	of		Annual	Program	Prior Year	Total:	Amount	Description
	Funds		Allocation:	Income:	Resources:	\$	Available	
			\$	\$	\$		Remainder	
							of ConPlan	
							\$	_
CDBG	Public-	Admin &	907,548	2,500	400,000	1,310,048	3,630,192	Anticipated
	Federal	Planning						one-year
		Economic						average
		Development						annual
		Housing						CDBG
		Public						allocation
		Improvements						
		Public						
		Services						
HOME	Public-	Admin	430,231	20,000	0	450,231	1,720,924	Anticipated
	Federal	Homebuyer						one-year
		Assistance						average
		Rental -Multi-						annual
		family						HOME
		Homeowner						allocation
		rehab						
		CHDO						

Table 5 - Expected Resources – Priority Table

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

The City's Planning and Housing Division will seek other grant funding sources to leverage with existing state, federal and general funds. The City was awarded over \$3 million HUD's Neighborhood Stabilization Program (NSP) to acquire, rehabilitate and sell foreclosed and abandoned homes and Community Development Block Grant — Recovery to stimulate the suffering economy. The City has closed out NSP3 and will close NSP1 this program year. To utilize the program income generated for CDBG eligible activities. The City will meet its HOME match requirements with the State funds available, local impact fees waivers and/reimbursement to non-profit developers, discounted homesteading lot program and other local contributions. The State of Florida funded the State Housing Initiatives Partnership (SHIP) program with an allocation of \$1,116,238 in housing and community development funding.

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

In 2019, the City created an In-Fill Land Bank program with (city and CRA owed lots) to award to builders/developers to increase the inventory of affordable housing. The lots are sold for \$1,000 and the

remaining value of the lot is in the form of a deferred lien and also may be reimbursed for non-utility impact fees. With single family homes, low to moderate homebuyers may be awarded down payment and closing costs.

#### Discussion

The City is awarded federal funds from HUD and an annual award from the State of Florida State Housing Initiatives Partnership (SHIP) program. The SHIP amount varies each year. The local CRA allocates an additional \$10,000 for those homeowners purchasing homes in the Midtown area. The City also allocates local funds to public services agencies along with waiving local impact fees for housing development.

The City has also contributed local General Fund and CRA dollars to various multi-family rental projects along with donating a parcel of city owned for development.

# **Annual Goals and Objectives**

# **AP-20 Annual Goals and Objectives**

# **Goals Summary Information**

Sort	Goal Name	Start	End	Category	Geographic	Needs Addressed	Funding	Goal Outcome Indicator
Order		Year	Year		Area			
1	Affordable	2022	2023	Affordable	Citywide	Preserve and maintain	CDBG:	Homeowner Housing
	Housing			Housing		affordable housing	\$1,105,878	Rehabilitated: 11 households
								Temporary Relocation: 3
							номе:	households
							\$261,464	
								New Construction Rental: 6
								households
2	Self	2022	2023	Non-Housing	Citywide	Preserve and maintain	HOME:	CHDO- 1 Unit
	Sufficiency			Community		affordable housing	\$168,767	
				Development				Direct Financial Assistance to
								Homebuyers: 5 households
3	Quality of	2022	2023	Non-Housing	Citywide	Code Enforcement &	CDBG:	Housing Code: 2019 Units
	life			Community	Code	Safety of Neighborhoods,	\$204,170	· ·
				Development	enforcement	Public Services		Clearance & Demo: 2 Units
								Public Services: 2,203

Table 1– Goals Summary

# **Goal Descriptions**

1	Goal Name Affordable Housing			
	Goal Description	Quality affordable housing, Temporary relocation, Housing Rehab Delivery, Rental Construction		
2	Goal Name	Self Sufficiency		
	Goal Description	Home Purchase Assistance, Community Housing Development Organization		
3	Goal Name	Quality of life		
	Goal Description	Code enforcement, Clearance and Demolition, Public Services		

Table 2 – Goals Name and Description

# **Projects**

### **AP-35 Projects - 91.220(d)**

#### Introduction

The City of Lakeland's Action Plan outlines its planned actions for the 2022 -2023 to support housing and community development for the City's low- and moderate-income populations, as well as the City's homeless and special needs groups.

The Division, under the direction of the Community and Economic Development Department, will continue to administer its Community Development Block Grant (CDBG) and HOME Investment Partnerships (HOME) affordable housing programs. The City will continue to provide funding for affordable housing rehabilitation, home purchase assistance and rental construction as well as coordinating efforts of social service providers to enhance the quality of life for persons at 80% and below of the area median income.

#### **Projects**

#	Project Name
1	Owner Occupied Housing Rehabilitation
2	Home Purchase Assistance – HOME funds
3	Temporary Relocation
4	Clearance and Demolition
5	New Construction Rental – HOME funds
6	Housing Rehabilitation Staff-Activity Delivery
7	Code Enforcement
8	General Program Administration
9	Community Housing Development Organization
10	City Wide Summer Recreation Program
11	Coleman Bush Building Summer Tutoring
12	Coleman Bush Building Fall Tutoring
13	Coleman Bush Building After School Program
14	Simpson Park Art Classes
15	Simpson Park Dance & Life Skills Classes
16	Simpson Park & Gandy Swimming Classes
17	Kelly Recreation Martial Arts Class
18	Achievement Academy
19	Boys & Girls Club
20	Florida Rural Legal Service
21	Homeless Coalition

#	Project Name
22	Lakeland Volunteers in Medicine
23	Peace River Center for Personal Growth, Inc
24	Talbot House Ministries of Lakeland, Inc
25	The Wilson House, Inc

**Table 1 – Project Information** 

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

Allocations are typically used to address high priority needs, as identified in this plan, on a citywide basis for projects primarily benefiting low- and moderate-income households. The basis for assigning priority given to each category of priority needs (include relative priority, where required,) was a series of focus group meetings with providers of housing and community services, public meetings and public hearings. Consultations with the local housing authority and other City and Planning documents were also considered. HOPWA assistance shall be provided throughout the Lakeland/Winter Haven EMSA or Polk County wide.

The primary obstacle to addressing underserved needs continues to be the diminishing availability of funds and the increasing requests of funding needs from non-profit agencies providing services to low-and moderate-income individuals.

# **AP-38 Project Summary**

# **Project Summary Information**

1	Project Name	Owner Occupied Rehabilitation
	Target Area	City-Wide
	Goals Supported	Affordable Housing
	Needs Addressed	Preserve and maintain affordable housing
	Funding	CDBG: \$711,830
	Description	Housing program provides major rehabilitation and emergency repair for owner-occupied housing for low-income homeowners.
	Target Date	09/30/2023
	Estimate the number and type of families that will benefit from the proposed activities	Estimated ten (10) low-income households
	Location Description	City of Lakeland, FL city limits
	Planned Activities	Single unit detached housing rehabilitation
2	Project Name	Home Purchase Assistance-HOME funds
	Target Area	City-Wide
	Goals Supported	Self Sufficiency
	Needs Addressed	Preserve and maintain affordable housing
	Funding	HOME: \$100,000
	Description	Provide down payment and closing cost assistance to low-income home buyers. Homes purchased must be within the city limits of Lakeland.
	Target Date	09/30/2023
	Estimate the number and type of families that will benefit from the proposed activities	Estimated five (5) low-income families
	Location Description	City of Lakeland, FL city limits
	Planned Activities	Down payment and closing cost assistance

3	Project Name	Temporary Relocation
	Target Area	City-Wide
	Goals Supported	Affordable Housing
	Needs Addressed	Preserve and maintain affordable housing
	Funding	CDBG: \$10,000
	Description	Temporary relocation for clients benefiting from the city's owner-occupied rehabilitation.
	Target Date	09/30/2023
	Estimate the number and type of families that will benefit from the proposed activities	Estimated three (3) low-income households
	Location Description	City of Lakeland, FL city limits
	Planned Activities	Temporary relocation assistance for clients benefiting from the City's owner-occupied rehabilitation program.
4	Project Name	Clearance and Demolition
	Target Area	City-Wide
	Goals Supported	Quality of life
	Needs Addressed	Preserve and maintain affordable housing
	Funding	CDBG: \$5,000
	Description	Clearance, demolition and removal of accessory building and improvement including movement of structure to other sites.
	Target Date	09/30/2023
	Estimate the number and type of families that will benefit from the proposed activities	Estimated two (2) low-income households.
	Location Description	City of Lakeland, FL city limits
	Planned Activities	Clearance and demolition for blighted properties
5	Project Name	New Construction Rental-HOME funds

	Target Area	City-Wide
	Goals Supported	Affordable Housing
	Needs Addressed	Preserve and maintain affordable housing
	Funding	HOME: \$238,441
	Description	Rental Development for low-income families-multi-family units
	Target Date	09/30/2023
	Estimate the number and type of families that will benefit from the proposed activities	Six (6) low-income households
	Location Description	City of Lakeland, FL city limits
	Planned Activities	New Rental Construction
6	Project Name	Housing Rehabilitation Staff-Activity Delivery
	Target Area	City-Wide
	Goals Supported	Affordable Housing
	Needs Addressed	Preserve and maintain affordable housing
	Funding	CDBG: \$200,000
	Description	Funds are budgeted to administer the Neighborhood Services Housing Section, owner occupied rehabilitation program. This includes activity delivery for CDBG and other low- income rehabilitation activities.
	Target Date	09/30/2023
	Estimate the number and type of families that will benefit from the proposed activities	Ten (10) low-income families
	Location Description	City of Lakeland, FL city limits
	Planned Activities	Housing Rehabilitation Staff Activity Delivery
7	Project Name	Code Enforcement
	Target Area	City-Wide
	Goals Supported	Quality of life

	Needs Addressed	Code enforcement
	Funding	CDBG: \$68,037
	Description	Code Enforcement as it relates to demolition, housing and environmental code violations, fire inspections, overgrowth/care of premises, and abandoned vehicles.
	Target Date	09/30/2023
	Estimate the number and type of families that will benefit from the proposed activities	Two thousand nineteen (2019) City of Lakeland residents in targeted census tracts
	Location Description	City of Lakeland, FL Census tracts 110, 111, 112.02, 112.03, 112.04, and south 1/2 of 113, 120.02, & 164
	Planned Activities	Costs incurred for inspection of code of violations and enforcement of codes.
8	Project Name	General Program Administration
	Target Area	City-Wide
	Goals Supported	Affordable Housing
	Needs Addressed	Preserve and maintain affordable housing
	Funding	CDBG: \$175,000 HOME: \$43,023
	Description	General program administration involving the oversight, monitoring and coordination of Community Development Block Grant Program and related activities. Payroll and benefits of staff involved in administration and costs for the provision of CDBG and HOME programs and information to the public. General program administration and project soft costs.
	Target Date	09/30/2023
	Estimate the number and type of families that will benefit from the proposed activities	Fifteen (15) low-income households
	Location Description	City of Lakeland, FL city limits
	Planned Activities	Administration of housing programs

9	Project Name	Community Housing Development Organization
	Target Area	City-Wide
	Goals Supported	Self Sufficiency
	Needs Addressed	Preserve and maintain affordable housing
	Funding	HOME: \$68,767
	Description	Housing acquisition and rehabilitation/reconstruction
	Target Date	09/30/2023
	Estimate the number and type of families that will benefit from the proposed activities	Estimated one (1) unit.
	<b>Location Description</b>	City of Lakeland, FL city limits
	Planned Activities	Reconstruction or rehabilitation of a single-family unit
10	Project Name	Simpson Park Camp Blast Summer Program
	Target Area	City-Wide
	Goals Supported	Quality of life
	Needs Addressed	Facilities and Services
	Funding	CDBG: \$23,611
	Description	This structured summer recreation program provided by the City of Lakeland's Parks and Recreation Department will provide activities for the youth.
	Target Date	09/30/2023
	Estimate the number and type of families that will benefit from the proposed activities	One hundred (100) low-income families
	<b>Location Description</b>	City of Lakeland, FL city limits
	Planned Activities	Youth Summer Camp Program at 4 locations
11	Project Name	Coleman Bush Building Summer Tutoring
	Target Area	City-Wide

	Goals Supported	Quality of life
	Needs Addressed	Facilities and Services
	Funding	CDBG: \$4,400
	Description	Summer tutoring for low-income households
	Target Date	09/30/2023
	Estimate the number and type of families that will benefit from the proposed activities	Fifty (50) low-income families
	Location Description	1104 Martin L. King Jr. Ave, Lakeland, FL 33805
	Planned Activities	Summer tutoring
12	Project Name	Coleman Bush Building Fall Tutoring
	Target Area	City-Wide
	Goals Supported	Quality of life
	Needs Addressed	Facilities and Services
	Funding	CDBG: \$14,800
	Description	After school tutoring for low-income households.
	Target Date	09/30/2023
	Estimate the number and type of families that will benefit from the proposed activities	Sixty plus (60+) low-income families
	Location Description	1104 Martin L. King Jr. Ave., Lakeland, FL 33805
	Planned Activities	After school tutoring for youth
13	Project Name	Coleman Bush After School Cultural Programs
	Target Area	City-Wide
	Goals Supported	Quality of life
	Needs Addressed	Facilities and Services
	Funding	CDBG: \$2,700

	Description	After school dance, piano
	Target Date	09/30/2023
	Estimate the number and type of families that will benefit from the proposed activities	Ten (10) low -income families
	Location Description	1104 Martin L. King Jr. Ave., Lakeland, FL 33805
	Planned Activities	Youth Activities
14	Project Name	Simpson Park Art
	Target Area	City-Wide
	Goals Supported	Quality of life
	Needs Addressed	Facilities and Services
	Funding	CDBG: \$3,240
	Description	After school art classes
	Target Date	09/30/2023
	Estimate the number and type of families that will benefit from the proposed activities	Two hundred fifty (250) low-income families
	<b>Location Description</b>	1725 Martin L. King Jr. Ave, Lakeland, FL 33805
	Planned Activities	After school art
15	Project Name	Simpson Park Dance & Life Skills Classes
	Target Area	City-Wide
	Goals Supported	Quality of life
	Needs Addressed	Facilities and Services
	Funding	CDBG: \$2,180
	Description	Dance & Life Skills classes
	Target Date	09/30/2023

	Estimate the number and type of families that will benefit from the proposed activities	Two hundred fifty (250) low-income families
	<b>Location Description</b>	1725 Martin L. King Jr. Ave, Lakeland, FL 33805
	Planned Activities	Dance classes & & Life Skills classes for youth
16	Project Name	Simpson Park & Gandy Summer Swimming Lessons
	Target Area	City-Wide
	Goals Supported	Quality of life
	Needs Addressed	Facilities and Services
	Funding	CDBG: \$4,700
	Description	Swim Classes
	Target Date	09/30/2023
	Estimate the number and type of families that will benefit from the proposed activities	Seventy-four (74) low-income families
	<b>Location Description</b>	1725 Martin L. King Jr. Ave, Lakeland, FL 33805
	Planned Activities	Swimming lessons for youth
17	Project Name	Kelly Recreation Martial Arts Classes
	Target Area	City-Wide
	Goals Supported	Quality of life
	Needs Addressed	Facilities and Services
	Funding	CDBG-\$2,870
	Description	Martial Arts Classes
	Target Date	09/30/2023

	Estimate the number and type of families that will benefit from the proposed activities	Eighty-two (82) low-income youth
	Location Description	404 Imperial Blvd, Lakeland, FL 33803
	Planned Activities	Martial Arts Classes for youth
18	Project Name	Achievement Academy
	Target Area	City-Wide
	Goals Supported	Quality of Life
	Needs Addressed	Facilities & Services
	Funding	CDBG-\$10,000
	Description	Home-based early intervention is provided to children birth to three who are at risk for developmental delays throughout Polk County
	Target Date	09/30/2023
	Estimate the number and type of families that will benefit from the proposed activities	One-hundred eighty-five (185) at-risk children
	Location Description	City-wide
	Planned Activities	Early intervention birth to three learning skills.
19	Project Name	Boys and Girls Club
	Target Area	City-Wide
	Goals Supported	Quality of life
	Needs Addressed	Facilities and Services
	Funding	CDBG: \$13,928
	Description	Programs proved a safe environment with the summer camp and after school program for low-income, at-risk youth at two (2) location.
	Target Date	09/30/2023

	Estimate the number and type of families that will benefit from the proposed activities	Eighty (80) low-income families
	<b>Location Description</b>	1525 Martin L. King Jr. Ave., Lakeland, FL 33805
	Planned Activities	Summer camp and after school programs for children.
20	Project Name	Florida Rural Legal Services
	Target Area	City-Wide
	Goals Supported	Quality of life
	Needs Addressed	Facilities and Services
	Funding	CDBG-\$10,000
	Description	Prevent homelessness through eviction defense and fair housing community education.
	Target Date	09/30/2023
	Estimate the number and type of families that will benefit from the proposed activities	One hundred (100) low-income families at risk of homelessness
	Location Description	1321 E. Memorial Blvd, Lakeland, FL 33801
	Planned Activities	Free legal assistance and education to residents who face health & economic hardships
21	Project Name	Homeless Coalition of Polk County, Inc.
	Target Area	City-Wide
	Goals Supported	Quality of life
	Needs Addressed	Facilities and Services
	Funding	CDBG-\$10,000

	Description	Provides services to home providers to seek housing options for homeless households including chronically homeless, veterans and families, meeting with prospective landlords to solicit participation in CoC's rental assistance and leasing programs as well as serving as liaison between case managers who are working with homeless households and landlords.
	Target Date	09/30/2023
	Estimate the number and type of families that will benefit from the proposed activities	Ten (10) homeless households
	<b>Location Description</b>	5304 S. Florida Ave Ste 406, Lakeland, FL 33813
	Planned Activities	Services to homeless households
22	Project Name	Lakeland Volunteers in Medicine
	Target Area	City-Wide
	<b>Goals Supported</b>	Quality of life
	Needs Addressed	Facilities and Services
	Funding	CDBG: \$10,252
	Description	A Non-profit agency provides medical care for the working uninsured with volunteers.
	Target Date	09/30/2023
	Estimate the number and type of families that will benefit from the proposed activities	Three hundred eighty (380) working uninsured Lakeland residents
	<b>Location Description</b>	600 W Peachtree St, Lakeland, FL 33815
	Planned Activities	Healthcare for the working uninsured
23	Project Name	Peace River Center for Personal Development, Inc
	Target Area	City-Wide
	Goals Supported	Quality of life
	Needs Addressed	Facilities and Services

	Funding	CDBG: \$15,000
	Description	Immediate crisis mental health services
	Target Date	09/30/2023
	Estimate the number and type of families that will benefit from the proposed activities	Twelve (12) children, adolescents, and adults
	Location Description	1831 Gilmore Ave, Lakeland, FL 33801
	Planned Activities	Mental Health services
24	Project Name	Talbot House Ministries
	Target Area	City-Wide
	Goals Supported	Quality of life
	Needs Addressed	Facilities and Services
	Funding	CDBG: \$7,500
	Description	Help pay utility costs for the agency location.
	Target Date	09/30/2023
	Estimate the number and type of families that will benefit from the proposed activities	Five hundred (500) low income and homeless persons
	<b>Location Description</b>	814 N Kentucky Ave., Lakeland, FL 33801
	Planned Activities	Assist with utility costs
25	Project Name	Wilson House, Inc
	Target Area	City Wide
	Goals Supported	Self Sufficiency
	Needs Addressed	Facilities and Services
	Funding	CDBG: \$5,000
	Description	Agency working with homeless, chronic male substance abuser in Lakeland
	Target Date	09/30/2023

Estimate the number and type of families that will benefit from the proposed activities	Fifty (50) male, chronically homeless, substance abuser
Location Description	510 Wildlife Trail. Lakeland, FL 33809
Planned Activities	Counseling services

#### AP-50 Geographic Distribution – 91.220(f)

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

The geographic areas of the City in which the CDBG funding will be invested consist of the areas identified by Census Tract. There are several areas that have high percentages of low-income residents. That is, the census tracts identified contain the highest concentration of low-income families. The population of the remaining low-income tracts is between 13 and 55 percent minority. The majority of the population in the census tracts is of low to moderate income.

Although the City of Lakeland's programs are citywide, the vast majority of funds are spent within the census tracts outlined in colors in the map. For PY 2022-2023 as in prior years, the Housing Division anticipates expending the majority of the funds in the census tracts through various housing programs and public services activities.

#### **Geographic Distribution**

Target Area	Percentage of Funds
Citywide	100
Code Enforcement	7

**Table 6 - Geographic Distribution** 

#### Rationale for the priorities for allocating investments geographically

Census Tracts where 51% of the individuals meet HUD's low/moderate Income standards (80% or less of the area median income) are identified as target areas for investment.

Assistance will also be made available citywide to persons meeting the CDBG eligibility requirements for lowand moderate-income benefit. While the City of Lakeland estimates the percentage of funds to be directed to low- and moderate-income areas or citywide, the City has not estimated the percentage of funds to be directed to specific areas.

#### Discussion

The City will concentrate its efforts on owner occupied rehabilitation, home purchase assistance, rental construction and public supportive services to benefit the low to moderate income clients citywide.

# **Affordable Housing**

### AP-55 Affordable Housing - 91.220(g)

#### Introduction

The Housing Division will concentrate its efforts on keeping families in their homes with its rehabilitation programs. There is a tremendous need for major and minor repairs of existing homes. The City also will provide eligible households with homeownership assistance. Rental Multi-family Construction has become a priority to assist those persons unable to obtain homeownership in their current financial status. The Analysis of Impediments to Fair Housing Choice shows that area (along with the nation) has shortage of affordable housing rental units for households at 50% and below of the AMI.

The Housing Division has committed its rehabilitation program to perform energy saving efforts such as R38 insulation, 15 SEER heating and cooling units; low E coating windows and low flow faucets and toilets.

One Year Goals for the Number of Households to be Supported	
Homeless	3
Non-Homeless	17
Special-Needs	3
Total	23

Table 7 - One Year Goals for Affordable Housing by Support Requirement

One Year Goals for the Number of Households Supported Through	
Rental Assistance	6
The Production of New Units	1
Rehab of Existing Units	10
Acquisition of Existing Units	5
Total	22

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

#### Discussion

## **AP-60 Public Housing – 91.220(h)**

### Introduction

The City works with the Lakeland Housing Authority (LHA) on different projects during the program year.

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

The City and LHA offers their residents positive programs, undertaking by both entities. LHA provides homebuyer education and the City offers down payment and closing assistance. LHA is currently building new affordable housing units through LIHTC funding and actively seeking out additional funding and partnerships to attain their goal of increasing available public housing by 30%. LHA offers the Family Self-Sufficiency and Youth Build Program and the City supports these programs by signing the Certificate of Consistency. The City also provides funds for low-income youth for scholarships at a local non-profit' agency and many youths from the housing complexes take advantage of the after school and summer programs.

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

LHA is committed to providing families in assisted housing with opportunities for growth and development. All recipients of Section 8 rental assistance are provided counseling through a case management and supportive service referral program based on the Family Self-Sufficiency model. LHA helps assist families into homeownership through the Public Housing Homeownership Program, the HOPE VI, and other programs. The City offers down payment assistance to qualified buyers that have completed a HUD approved buyer's education course.

The City encourages its general contractors to recruit residents of its housing complexes and Youth Build program with its Section 3 requirements. This would promote opportunities for clients to earn income to become homeowners. As mentioned above, LHA offers homebuyer education and the City provides down payment and closing assistance to clients.

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

The Lakeland Housing Authority is not designated as "troubled".

### Discussion

The City has a strong working relationship with the Lakeland Housing Authority with the support of its many services offered and also waiver of particular impact fees for their multiple family projects. The City's Community Redevelopment Agency (CRA) awarded \$288,000 funds to a second phase of a multi-family housing project which is currently occupied to capacity. The goals of LHA to increase the availability of affordable housing align with the goals of the City of Lakeland.

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

#### Introduction

The city staff works closely with the local homeless and special needs providers to support their efforts in their programs.

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 Lakeland partners with the Homeless Coalition of Polk County which acts as the lead agency for the Continuum of Care for the area. The goals are to identify, coordinate, integrate, and leverage resources to maximize impact of services for individuals who are homeless or at risk of homelessness.

Our homeless outreach one-year goals and actions are to:

- Examine the capacity of outreach efforts and expand services to meet demand.
- Create and deliver basic training for outreach volunteers, library employees, law enforcement, and other frontline service providers.

### Addressing the emergency shelter and transitional housing needs of homeless persons

Our one-year goals and actions to address this issue are to:

Develop a strategy to align the emergency shelter and transitional housing beds more closely with needs over the next 5 years.

Allocate HOME-American Rescue Plan (ARP) funds to multi-family rental projects to benefits clients who are homeless and at risk of homeless.

Workings with Polk County determine whether an emergency shelter outside the City of Lakeland would better serve the homeless. Currently, the only emergency shelters are located in the City of Lakeland.

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

Our one-year goals and actions to address this issue are to:

- Increase funding for rapid re-housing by working with agencies and private partners, the community foundation serving Lakeland, to make rapid re-housing projects a funding priority.
- Prioritize rapid re-housing for CoC funding.
- Assist in funding a Housing Navigator to locate available housing within the county.

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

Our one-year goals and actions to address this issue are to:

- Identify community prevention partners determining what each prevention partner group can best do for prevention and ensure processes and tools are in place to support prevention.
- CoC monitors provider housing stability providing technical assistance to poor performers as needed.

### Discussion

The City supports the efforts of homeless community with the support of public service agencies and city resources such as policing the homeless community, extra trash pickup by the Solid waste division. The special needs community is also support with the financial awards to public agencies and waiver of impact fees for special needs development project.

The City is funding a position with the HCPC to locate available housing for homeless clients and also has issued a Request for Application to assist multi-family rental developers with development cost with HOME- ARP funds.

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

### Introduction:

The effect of City public policies on the cost of affordable housing may include tax policy affecting land and other property, land use controls, zoning ordinances, building codes, impact fees, growth limits, and policies that affect the return on residential investment. The City has a review process in place for all City actions that may adversely impact the development and cost of affordable housing. The following programs have been established to support affordable housing within the city limits.

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

Impact Fee Credits-All land development activity, regardless of type or location, may receive an impact fee credit for a structure which has been removed within the prior five years.

Impact Fee Exemptions-The City has in place impact fee exemptions targeted to a specific location. Through an inter-local agreement with Polk County, development in the Core Improvement Area is exempt from all County and City impact fees except water, wastewater, and fire service capacity fees.

Tax Increment Benefits-In the Downtown Community Redevelopment Area, property owners are eligible to take advantage of tax increment benefits for renovation/improvement to a current structure.

Affordable Housing Incentive Plan-In 1992 when the State enacted the William E. Sadowski Affordable Housing Act, which provided a comprehensive funding package for affordable housing programs, local governments had to develop a "Local Housing Incentive Plan" to receive funds under the Act. The City appointed an Affordable Housing Advisory Committee (AHAC) which, through the Affordable Housing Incentive Plan, established the incentives to be provided to encourage the development of affordable housing. The incentives made available through this Plan include:

Expedited permitting for all affordable housing developers;

- Developers may request impact fee reimbursements if the unit is sold or rented to an eligible household. If the unit is located in an Affordable Housing Incentive's Central City Supportive Transit Area, the developer may be eligible for a larger reimbursement in impact fees.
- Eligibility for additional incentives that may be approved by the Community & Economic Division Staff, including reduced road widths, and modifications in curbing, parking, or other site improvement features. The developer is responsible for requesting these specific reductions or modifications.

Code Enforcement-The Code Enforcement Section of the Community and Economic Development Department is responsible for investigating and citing properties for code violations, boarding up abandoned buildings, demolishing unsafe structures, and maintaining vacant lots. Code Enforcement receives funding from both CDBG and the City's General Fund. Code Enforcement has a new computer

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system that allows the tracking of code violations by Census Tract.

In Fill Land Bank Program was created in 2019 to replace the outdated Urban Homestead Program. In Lakeland's most distressed areas, City and CRA owed awarded to builders/developers to increase the inventory of affordable housing. The lots are sold for \$1,000 and the remaining value of the lot is in the form of a deferred lien and also may be reimbursed for non-utility impact fees. The units must be sold or rented to an income qualified individual or household. With single family homes, low to moderate homebuyers may be awarded down payment and closing costs. There has been ?? homes purchased by low to moderate income homebuyers.

Accessory Dwelling Units-The City amended its Land Development regulations to allow accessory dwelling units (ADU) in residential zoning districts. ADUs may provide affordable units for retirees, single persons, couples and students while attending college or preparing to become independent.

#### Discussion:

N/A

## **AP-85 Other Actions – 91.220(k)**

#### Introduction:

The City will perform the actions stated below to assist low to moderate income households and persons with affordable housing and social service needs.

### Actions planned to address obstacles to meeting underserved needs

The Housing Division has identified several obstacles that will hinder its ability to address the identified needs in the five-year Consolidated Plan. These include the following:

The primary obstacle to meeting underserved needs in the City is the limited financial resources available to address identified priorities. For example, the amount of CDBG funds available under the 15% Public Service cap is consistently and significantly less than the amount requested to meet local goals. The State housing trust fund has fluctuated over the last several years. This fund complemented the federal funds coming into the community.

Escalating the impact of limited available funding is the current increase in housing construction foreclosures in Lakeland/Polk County/Florida, increased homelessness and risk of homelessness, increased loss of employment due to the COVID and need for increased supportive services for the growing population that is affected by the economy. Such supportive Services, day care and transportation, are in lacking due to the pandemic. The City, along with communities, has even fewer resources available to address these issues.

The community development needs are outlined as priorities addressed in the next section to be achieved over the next five-year period 2021 to 2025.

### Actions planned to foster and maintain affordable housing

As stated in above paragraphs, the City will concentrate its efforts on keeping families in their homes with its rehabilitation programs. There is a tremendous need for minor and major repairs of existing homes. The City also will provide eligible households with homeownership assistance. Rental construction is priority for low-income renters.

The City's rehab program is committed to provide energy saving efforts such as R38 insulation, 15 SEER heating and cooling units, low E coating windows and low flow faucets and toilets.

The City will continue to support homeless service providers with public service funds in programs to assist households and prevent homelessness. The City supports local non-profit developers with waiver of impact fees, discounted lots and contributed General Fund, CRA and HOME funds to add to the construction of units to the affordable housing market. Down payment and closing assistance award have increased due to homebuyers lacking the funds for the first-time homebuyers.

### Actions planned to reduce lead-based paint hazards

The City of Lakeland addresses lead-based paint hazards as part of the rehabilitation program. The City addresses any lead-based paint hazards pursuant to 24 CFR Part 35 Final Rule effective September 15, 2000.

### Actions planned to reduce the number of poverty-level families

The goal of the City is to address issues relating to poverty through assistance to both outside agencies and City programs. Funded activities that provide assistance and training to lower-income persons include Salvation Army and Talbot House programs, Homeless Coalition of Polk County support, drug prevention activities, after school programs, summer teen activities, volunteers to assist elderly shut-ins, programs for persons with disabilities, counseling, and recreational programs for low-income children.

The Housing Assistance Program will continue to focus on training and counseling activities that help families become successful homeowners. The Affordable Housing Advisory Committee and the Housing Assistance Partnership Task Force will continue to oversee the implementation of housing programs and attempt to ensure affordable, decent housing for all residents. The City recently amended its Affordable Housing Incentive Plan to expand the area of affordable housing incentives. The City's single-family rehab program helps lower income owners make needed repairs, which enables them to remain in their affordable homes. The Division offers homebuyer education to clients interested in purchasing homes.

The Housing Division maintains contacts with other agencies supplying services to low-income residents such as the Lakeland Housing Authority, various homeless service agencies, and local non-profit agencies with programs that benefit children and families.

The Lakeland Housing Authority operates the Family Self-Sufficiency and Section 8 FSS programs to promote the development of local strategies to coordinate the use of assistance under the public housing program with public and private resources, enable participating families to increase earned income, reduce or eliminate the need for welfare assistance, and make progress toward achieving economic independence and self-sufficiency. The FSS program supports HUD's strategic goals of helping HUD-assisted renters make progress toward housing self-sufficiency welfare reform and help families develop new skills that will lead to economic self-sufficiency. As a result of their participation in the FSS program, many families have achieved stable, well-paid employment, which had made it possible for them to become homeowners or move to other non-assisted housing. The city signs LHA's certificate of consistency for its submission to funding sources.

All local non-profit agencies serving the homeless offer some level of supportive services to program participants, ranging from family counseling to job skill development, all of which are intended to promote self-sufficiency and prevent a return to poverty and homelessness.

### Actions planned to develop institutional structure

In its efforts to develop institutional structure during 2022, the city will undertake the following activities:

- Work with other City's Departments and Management to best address affordable housing goals and objectives.
- Continue to support and coordinate with the Polk County Continuum of Care (CoC) to help ensure the best possible system of supports for people who are homeless or at risk of homelessness.
- Continue to work with affording housing partners such as Keystone Challenge, Lakeland Habitat
  and Lakeland Housing Authority and multi-family developers. The Keystone Challenge agency
  recently closed its doors; but the City entered into contract with a new certified housing
  counseling agency, Housing and Neighborhood Development Service of Central Florida, HANDS,
  who is able to offer other services, such as rental counseling and more services in Spanish.
- Continue to implement revised internal Division outcome reporting structures to optimize efficiency and accuracy associated with annual performance reporting.
- Continue to review internal and external policies and procedures and create technical assistance training for subrecipients.

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

The City is committed to the close coordination of all its programs with other City departments, local non-profits, and private sector. The City's Staff will continue to participate in events and planning sessions of the local housing authority, private housing developers and health and social service agencies.

In a survey performed by Lakeland Vision, it outlined several priorities for the local community such as: effective land planning to provide diverse housing options for all incomes, preservation of green space and trees, reducing Lakeland's homeless population through outreach shelters and housing programs that provide comprehensive support services, including childcare, education, and job placement.

The City has an ongoing relationship with the Lakeland Housing Authority (LHA). The city also supports the LHA Youth Build project.

The City provides several health and social service agencies with CDBG and City general funds through the public/community service application process.

#### Discussion:

The City will coordinate its efforts with other agencies in the community to provide services to the low-income households and assist those in the prevention of becoming homeless.

## **Program Specific Requirements**

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

The City uses CDBG program funds to ensure decent affordable housing, to provide services to the most vulnerable in our communities, to create jobs through the expansion and retention of businesses and to support strong and healthy neighborhoods. Not less than 70 percent of CDBG funds are used for activities that benefit low- and moderate-income persons, and each funded activity meets one of the following national CDBG objectives:

- benefit low- and moderate-income persons,
- prevention or elimination of slums or blight, or
- address community development needs having a particular urgency because existing conditions pose a serious and immediate threat to the health or welfare of the community for which other funding is not available.

## 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.

#### **Table 67 – Program Income**

<ol> <li>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</li> <li>The amount of proceeds from section 108 loan guarantees that will be used during the year</li> </ol>	2,500
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	U
not been included in a prior statement or plan	0
5. The amount of income from float-funded activities	0
Total Program Income:	2,500

## Other CDBG Requirements Table 68-Other CDBG Requirements

1. The amount of urgent need activities 0

2. The estimated percentage of CDBG fund 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 used to benefit persons of low and moderate income. Specify the years covered that include this Annual Action Plan.
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:

For HOME funds, the City has no forms of investment other than those described in Section 92.205(b). HOME funds are invested as deferred payment loan

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 utilizes the recapture method for HOME programs as written in 24 CFR 92.254 {a} {4} with the period of affordability and Recapture Provisions of 24 CFR 92.254 {5}{ii}.

Direct subsidies will be provided in the form of a deferred lien. If a homeowner elects to sale or use the property for non-eligible HOME Program activities, the amount of HOME fund assistance that the subrecipient or CHDO used to purchase and construct or rehabilitate and a homebuyer to purchase, shall be recaptured and repaid to the City provided the net proceeds are sufficient.

In the event of a sale (voluntary or involuntarily) of the housing unit, and there are no net proceeds, or the net proceeds are insufficient to repay the HOME investment due, the City shall recapture the net proceeds, if any. The net proceeds are the sale price minus superior loan repayment (other than HOME funds) and any closing costs.

All CHDO's and subrecipients that are awarded HOME funding for the creation of affordable homebuyer units will use the recapture provisions. This language is included in the written contracts.

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:

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:

Home Purchase Assistance – Assistance provided requires a recapture (affordability term) for all HOME funding. Down payment and closing cost assistance provided as a direct benefit to the client for home purchase assistance shall be recaptured as follows:

Amount of HOME Assistance per Unit	<u>Affordability Term</u>
Under \$15,000	5 years
\$15,000 to \$40,000	10 years
Over \$40,000	15 years

Annual Action Plan

The contractor's fee is provided as a grant to the client, not subject to recapture; but will be used to calculate the affordability period.

All homebuyers who receive HOME Program assistance will sign a deferred lien and HOME agreement that state the homebuyer will ensure the property remains their principal residence during the period of affordability, as determined by the funding amount. The City maintains a loan portfolio that is reviewed annually to determine if the home remains the borrower's primary residence.

Housing Rehabilitation – Recapture provisions are applied to housing rehabilitation with the pro rata reduction of the deferred lien amount.

Housing Reconstruction – Recapture provisions are applied to reconstruction with the pro rata reduction of the deferred lien amount

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 does not intend to use HOME funds to refinance existing debt secured by multi-family housing that is being rehabilitated with HOME funds. The City's HOME funds are used for single-family units.

For purposes of the Housing Division programs, the City elects to utilize for its income eligibility requirement the Section 8-Part 5 program definition for annual income to determine household income. This definition shall be used program wide.

OMB Number: 4040-0004 Expiration Date: 12/31/2022

Application for Federal Assistance SF-424			
* 1. Type of Submission:  Preapplication  Application  Changed/Corrected Applica	New Continuation	* If Revision, select appropriate letter(s):  * Other (Specify):	
* 3. Date Received:	4. Applicant Identifier:		
5a. Federal Entity Identifier:  B-22-MC-12-0011  5b. Federal Award Identifier:			
State Use Only:			
6. Date Received by State:	7. State Application	Identifier:	
8. APPLICANT INFORMATION:			
	eland Florida		
* a. Legal Name: City of Lakeland, Florida  * b. Employer/Taxpayer Identification Number (EIN/TIN):  59-6000354  * c. Organizational DUNS:  0209979120000			
d. Address:			
* Street1: 228 S. Massachusetts Avenue Street2:			
* City: Lakeland			
County/Parish: Polk  * State: FL: Florida			
Province:			
* Country: USA: UNITED STATES			
* Zip / Postal Code: 33801-501	2		
e. Organizational Unit:			
Department Name:		Division Name:	
Community & Economic Dev	elop.	Community Planning & Housing	
f. Name and contact information	of person to be contacted on m	atters involving this application:	
Prefix: Mr.	* First Name		
Middle Name: B.			
* Last Name: Smith			
Suffix:			
Title: Housing Programs Manager			
Organizational Affiliation:			
* Telephone Number: 863/834-3360 Fax Number: 863/834-6266			
* Email: michael.smith3@la	kelandgov.net		

Application for Federal Assistance SF-424
* 9. Type of Applicant 1: Select Applicant Type:
C: City or Township Government
Type of Applicant 2: Select Applicant Type:
Type of Applicant 3: Select Applicant Type:
* Other (specify):
* 10. Name of Federal Agency:
U. S. Department of Housing and Urban Development
11. Catalog of Federal Domestic Assistance Number:
14*218
CFDA Title:
Community Development Block Grant
* 12. Funding Opportunity Number:
12. Fulluling Opportunity Number.
* Title:
13. Competition Identification Number:
Title:
14. Areas Affected by Project (Cities, Counties, States, etc.):
Add Attachment Delete Attachment View Attachment
* 15. Descriptive Title of Applicant's Project:
City wide Affordable Housing Programs, Public services and Infrastructure
Attach supporting documents as specified in agency instructions.
Add Attachments Delete Attachments View Attachments

Application for Federal Assistance SF-424				
16. Congressional Districts Of:				
* a. Applicant FL-015 * b. Program/Project FL-015				
Attach an additional list of Program/Project Congressional Districts if needed.				
Add Attachment Delete Attachment View Attachment				
17. Proposed Project:				
* a. Start Date: 10/01/2022 * b. End Date: 09/30/2023				
18. Estimated Funding (\$):				
* a. Federal 907,548.00				
* b. Applicant				
* c. State				
* d. Local				
* e. Other				
* f. Program Income 2,500.00				
* g. TOTAL 910,048.00				
* 19. Is Application Subject to Review By State Under Executive Order 12372 Process?				
a. This application was made available to the State under the Executive Order 12372 Process for review on				
b. Program is subject to E.O. 12372 but has not been selected by the State for review.				
c. Program is not covered by E.O. 12372.				
* 20. Is the Applicant Delinquent On Any Federal Debt? (If "Yes," provide explanation in attachment.)				
Yes No				
If "Yes", provide explanation and attach				
Add Attachment Delete Attachment View Attachment				
21. *By signing this application, I certify (1) to the statements contained in the list of certifications** and (2) that the statements herein are true, complete and accurate to the best of my knowledge. I also provide the required assurances** and agree to comply with any resulting terms if I accept an award. I am aware that any false, fictitious, or fraudulent statements or claims may subject me to criminal, civil, or administrative penalties. (U.S. Code, Title 218, Section 1001)  ** I AGREE  ** The list of certifications and assurances, or an internet site where you may obtain this list, is contained in the announcement or agency specific instructions.				
Authorized Representative:				
Prefix: Mr . * First Name: M .				
Middle Name: Shawn				
*Last Name: Sherrouse				
Suffix:				
* Title: City Manager				
* Telephone Number: 863/834-6248 Fax Number: 863/834-8402				
* Email: shawn.sherrouse@lakelandgov.net				
* Signature of Authorized Representative:				

OMB Number: 4040-0004 Expiration Date: 12/31/2022

* 1. Type of Submission:  Preapplication  New  Application  Continuation  Revision  * If Revision, select appropriate letter(s):  Other (Specify):  Revision			
* 3. Date Received:  4. Applicant Identifier:			
5a. Federal Entity Identifier:  M-22-MC-12-0228  5b. Federal Award Identifier:			
State Use Only:			
6. Date Received by State: 7. State Application Identifier:			
8. APPLICANT INFORMATION:			
*a. Legal Name: City of Lakeland, Florida			
* b. Employer/Taxpayer Identification Number (EIN/TIN):  * c. Organizational DUNS:    0209979120000			
59-6000354			
d. Address:			
*Street1: 228 S. Massachusetts Avenue			
Street2:			
* City: Lakeland			
County/Parish:			
* State: FL: Florida			
Province:			
* Country: USA: UNITED STATES			
* Zip / Postal Code: 38801-5012			
e. Organizational Unit:			
Department Name: Division Name:			
Community & Economic Delevop Community Planning & Housing			
f. Name and contact information of person to be contacted on matters involving this application:			
Prefix: Mr. * First Name: Michael			
Middle Name: B.			
* Last Name: Smith			
Suffix:			
Title: Housing Programs Manager			
Organizational Affiliation:			
* Telephone Number: 863/834-3360 Fax Number: 863/834-6266			
* Email: michael.smith3@lakelandgov.net			

Application for Federal Assistance SF-424
* 9. Type of Applicant 1: Select Applicant Type:
C: City or Township Government
Type of Applicant 2: Select Applicant Type:
Type of Applicant 3: Select Applicant Type:
* Other (specify):
* 10. Name of Federal Agency:
U. S. Department of Housing & Urban Development
11. Catalog of Federal Domestic Assistance Number:
14-239
CFDA Title:
HOME Investment Partnerships
* 12. Funding Opportunity Number:
* Title:
13. Competition Identification Number:
Title:
14. Areas Affected by Project (Cities, Counties, States, etc.):
Add Attachment Delete Attachment View Attachment
* 15. Descriptive Title of Applicant's Project:
City wide Affordable housing programs
Attach supporting documents as specified in agency instructions.
Add Attachments Delete Attachments View Attachments

Application for Federal Assistance SF-424							
16. Congression	nal Districts Of:						
* a. Applicant	FL-015			* b. Progra	m/Project FL-01	.5	
Attach an addition	nal list of Program/Project C	Congressional District	s if needed.				
			Add Attachmen	Delete At	tachment Vie	w Attachment	
17. Proposed Pr	roject:						
* a. Start Date:	10/01/2022			* b.	End Date: 09/30	0/2023	
18. Estimated F	unding (\$):						
* a. Federal		430,231.00					
* b. Applicant							
* c. State							
* d. Local							
* e. Other							
* f. Program Inco	me	20,000.00					
* g. TOTAL		450,231.00					
* 19. Is Applicati	ion Subject to Review By	State Under Exec	utive Order 12372	Process?		14.	
a. This appli	cation was made availab	le to the State unde	er the Executive O	der 12372 Proce	ess for review on		*
b. Program i	is subject to E.O. 12372 t	out has not been se	lected by the State	e for review.			
c. Program i	s not covered by E.O. 12	372.					
* 20. Is the Appl	icant Delinquent On Any	Federal Debt? (If	"Yes," provide ex	planation in atta	chment.)		
Yes	No						
If "Yes", provide	explanation and attach						
			. Add Attachment	Delete At	achment Vie	w Attachment	
herein are true, comply with any subject me to cr	this application, I certify complete and accurate resulting terms if I acceriminal, civil, or administ iffications and assurances, as.	e to the best of mept an award. I am a rative penalties. (U	y knowledge. I a aware that any fal .S. Code, Title 21	so provide the se, fictitious, or 3, Section 1001)	required assuran fraudulent statem	ices** and agree to ents or claims may	
Authorized Rep	resentative:						
Prefix: M	r.	* Firs	t Name: M.				
-	hawn						
* Last Name: S	herrouse						
Suffix:							
* Title: Cit	y Manager						
* Telephone Numl	ber: 863/834-6248	^		Fax Number: 86	53/834-8402		
* Email: shawn.	sherrouse@lakeland	gov.net					
* Signature of Aut	horized Representative:	Mie	V			* Date Signed:	8/9/22

### ASSURANCES - CONSTRUCTION PROGRAMS

OMB Number: 4040-0009 Expiration Date: 02/28/2022

Public reporting burden for this collection of information is estimated to average 15 minutes per response, including time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden, to the Office of Management and Budget, Paperwork Reduction Project (0348-0042), Washington, DC 20503.

# PLEASE DO NOT RETURN YOUR COMPLETED FORM TO THE OFFICE OF MANAGEMENT AND BUDGET. SEND IT TO THE ADDRESS PROVIDED BY THE SPONSORING AGENCY.

NOTE: Certain of these assurances may not be applicable to your project or program. If you have questions, please contact the Awarding Agency. Further, certain Federal assistance awarding agencies may require applicants to certify to additional assurances. If such is the case, you will be notified.

As the duly authorized representative of the applicant:, I certify that the applicant:

- Has the legal authority to apply for Federal assistance, and the institutional, managerial and financial capability (including funds sufficient to pay the non-Federal share of project costs) to ensure proper planning, management and completion of project described in this application.
- Will give the awarding agency, the Comptroller General
  of the United States and, if appropriate, the State,
  the right to examine all records, books, papers, or
  documents related to the assistance; and will establish
  a proper accounting system in accordance with
  generally accepted accounting standards or agency
  directives.
- 3. Will not dispose of, modify the use of, or change the terms of the real property title or other interest in the site and facilities without permission and instructions from the awarding agency. Will record the Federal awarding agency directives and will include a covenant in the title of real property acquired in whole or in part with Federal assistance funds to assure non-discrimination during the useful life of the project.
- Will comply with the requirements of the assistance awarding agency with regard to the drafting, review and approval of construction plans and specifications.
- Will provide and maintain competent and adequate engineering supervision at the construction site to ensure that the complete work conforms with the approved plans and specifications and will furnish progressive reports and such other information as may be required by the assistance awarding agency or State.
- Will initiate and complete the work within the applicable time frame after receipt of approval of the awarding agency.
- Will establish safeguards to prohibit employees from using their positions for a purpose that constitutes or presents the appearance of personal or organizational conflict of interest, or personal gain.

- Will comply with the Intergovernmental Personnel Act of 1970 (42 U.S.C. §§4728-4763) relating to prescribed standards of merit systems for programs funded under one of the 19 statutes or regulations specified in Appendix A of OPM's Standards for a Merit System of Personnel Administration (5 C.F.R. 900, Subpart F).
- Will comply with the Lead-Based Paint Poisoning Prevention Act (42 U.S.C. §§4801 et seq.) which prohibits the use of lead-based paint in construction or rehabilitation of residence structures.
- 10. Will comply with all Federal statutes relating to nondiscrimination. These include but are not limited to: (a) Title VI of the Civil Rights Act of 1964 (P.L. 88-352) which prohibits discrimination on the basis of race, color or national origin; (b) Title IX of the Education Amendments of 1972, as amended (20 U.S.C. §§1681 1683, and 1685-1686), which prohibits discrimination on the basis of sex; (c) Section 504 of the Rehabilitation Act of 1973, as amended (29) U.S.C. §794), which prohibits discrimination on the basis of handicaps; (d) the Age Discrimination Act of 1975, as amended (42 U.S.C. §§6101-6107), which prohibits discrimination on the basis of age; (e) the Drug Abuse Office and Treatment Act of 1972 (P.L. 92-255), as amended relating to nondiscrimination on the basis of drug abuse; (f) the Comprehensive Alcohol Abuse and Alcoholism Prevention, Treatment and Rehabilitation Act of 1970 (P.L. 91-616), as amended, relating to nondiscrimination on the basis of alcohol abuse or alcoholism; (g) §§523 and 527 of the Public Health Service Act of 1912 (42 U.S.C. §§290 dd-3 and 290 ee 3), as amended, relating to confidentiality of alcohol and drug abuse patient records; (h) Title VIII of the Civil Rights Act of 1968 (42 U.S.C. §§3601 et seq.), as amended, relating to nondiscrimination in the sale. rental or financing of housing; (i) any other nondiscrimination provisions in the specific statue(s) under which application for Federal assistance is being made; and (j) the requirements of any other nondiscrimination statue(s) which may apply to the application.

- 11. Will comply, or has already complied, with the requirements of Titles II and III of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (P.L. 91-646) which provide for fair and equitable treatment of persons displaced or whose property is acquired as a result of Federal and federally-assisted programs. These requirements apply to all interests in real property acquired for project purposes regardless of Federal participation in purchases.
- 12. Will comply with the provisions of the Hatch Act (5 U.S.C. §§1501-1508 and 7324-7328) which limit the political activities of employees whose principal employment activities are funded in whole or in part with Federal funds.
- 13. Will comply, as applicable, with the provisions of the Davis-Bacon Act (40 U.S.C. §§276a to 276a-7), the Copeland Act (40 U.S.C. §276c and 18 U.S.C. §874), and the Contract Work Hours and Safety Standards Act (40 U.S.C. §§327-333) regarding labor standards for federally-assisted construction subagreements.
- 14. Will comply with flood insurance purchase requirements of Section 102(a) of the Flood Disaster Protection Act of 1973 (P.L. 93-234) which requires recipients in a special flood hazard area to participate in the program and to purchase flood insurance if the total cost of insurable construction and acquisition is \$10,000 or more.
- 15. Will comply with environmental standards which may be prescribed pursuant to the following: (a) institution of environmental quality control measures under the National Environmental Policy Act of 1969 (P.L. 91-190) and Executive Order (EO) 11514; (b) notification of violating facilities pursuant to EO 11738; (c) protection of wetlands pursuant to EO 11990; (d) evaluation of flood hazards in floodplains in accordance with EO 11988; (e) assurance of project consistency with the approved State management program developed under the Coastal Zone Management Act of 1972 (16 U.S.C. §§1451 et seq.); (f) conformity of

- Federal actions to State (Clean Air) implementation Plans under Section 176(c) of the Clean Air Act of 1955, as amended (42 U.S.C. §§7401 et seq.); (g) protection of underground sources of drinking water under the Safe Drinking Water Act of 1974, as amended (P.L. 93-523); and, (h) protection of endangered species under the Endangered Species Act of 1973, as amended (P.L. 93-205).
- Will comply with the Wild and Scenic Rivers Act of 1968 (16 U.S.C. §§1271 et seq.) related to protecting components or potential components of the national wild and scenic rivers system.
- Will assist the awarding agency in assuring compliance with Section 106 of the National Historic Preservation Act of 1966, as amended (16 U.S.C. §470), EO 11593 (identification and protection of historic properties), and the Archaeological and Historic Preservation Act of 1974 (16 U.S.C. §§469a-1 et seq).
- 18. Will cause to be performed the required financial and compliance audits in accordance with the Single Audit Act Amendments of 1996 and OMB Circular No. A-133, "Audits of States, Local Governments, and Non-Profit Organizations."
- Will comply with all applicable requirements of all other Federal laws, executive orders, regulations, and policies governing this program.
- 20. Will comply with the requirements of Section 106(g) of the Trafficking Victims Protection Act (TVPA) of 2000, as amended (22 U.S.C. 7104) which prohibits grant award recipients or a sub-recipient from (1) Engaging in severe forms of trafficking in persons during the period of time that the award is in effect (2) Procuring a commercial sex act during the period of time that the award is in effect or (3) Using forced labor in the performance of the award or subawards under the award.

SIGNATURE OF AUTHORIZED CERTIFYING OFFICIAL	TITLE
The E South	Housing Programs Manager
APPLICANT ORGANIZATION	DATE SUBMITTED
City of Lakeland, Florida	8/11/2022

SF-424D (Rev. 7-97) Back

### CERTIFICATIONS

In accordance with the applicable statutes and the regulations governing the consolidated plan regulations, the jurisdiction certifies that:

Affirmatively Further Fair Housing -- The jurisdiction will affirmatively further fair housing.

Uniform Relocation Act and Anti-displacement and Relocation Plan -- It will comply with the acquisition and relocation requirements of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended, (42 U.S.C. 4601-4655) and implementing regulations at 49 CFR Part 24. It has in effect and is following a residential anti-displacement and relocation assistance plan required under 24 CFR Part 42 in connection with any activity assisted with funding under the Community Development Block Grant or HOME programs.

Anti-Lobbying -- To the best of the jurisdiction's knowledge and belief:

- 1. No Federal appropriated funds have been paid or will be paid, by or on behalf of it, to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with the awarding of any Federal contract, the making of any Federal grant, the making of any Federal loan, the entering into of any cooperative agreement, and the extension, continuation, renewal, amendment, or modification of any Federal contract, grant, loan, or cooperative agreement;
- 2. If any funds other than Federal appropriated funds have been paid or will be paid to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with this Federal contract, grant, loan, or cooperative agreement, it will complete and submit Standard Form-LLL, "Disclosure Form to Report Lobbying," in accordance with its instructions; and
- 3. It will require that the language of paragraph 1 and 2 of this anti-lobbying certification be included in the award documents for all subawards at all tiers (including subcontracts, subgrants, and contracts under grants, loans, and cooperative agreements) and that all subrecipients shall certify and disclose accordingly.

**Authority of Jurisdiction** -- The consolidated plan is authorized under State and local law (as applicable) and the jurisdiction possesses the legal authority to carry out the programs for which it is seeking funding, in accordance with applicable HUD regulations.

Consistency with plan -- The housing activities to be undertaken with Community Development Block Grant, HOME, Emergency Solutions Grant, and Housing Opportunities for Persons With AIDS funds are consistent with the strategic plan in the jurisdiction's consolidated plan.

Section 3 b will comply with section 3 of the Housing and Urban Development Act of 1968 (12 U.S.C. 170 lu) and implementing regulations at 24 CFR Part 135.

8/9/2Z Date

M. Shawn Sherrouse

## Specific Community Development Block Grant Certifications

The Entitlement Community certifies that:

Citizen Participation -- It is in full compliance and following a detailed citizen participation plan that satisfies the requirements of 24 CFR 91.105.

Community Development Plan -- Its consolidated plan identifies community development and housing needs and specifies both short-term and long-term community development objectives that that have been developed in accordance with the primary objective of the CDBG program (i.e., the development of viable urban communities, by providing decent housing and expanding economic opportunities, primarily for persons of low and moderate income) and requirements of 24 CFR Parts 91 and 570.

Following a Plan -- It is following a current consolidated plan that has been approved by HUD.

Use of Funds -- It has complied with the following criteria:

1. Maximum Feasible Priority. With respect to activities expected to be assisted with CDBG
funds, it has developed its Action Plan so as to give maximum feasible priority to activities which
benefit low- and moderate-income families or aid in the prevention or elimination of slums or
blight. The Action Plan may also include CDBG-assisted activities which the grantee certifies
are designed to meet other community development needs having particular urgency because
existing conditions pose a serious and immediate threat to the health or welfare of the community
and other financial resources are not available (see Optional CDBG Certification).

- 2. Overall Benefit. The aggregate use of CDBG funds, including Section 108 guaranteed loans, during program year(s) \_\_\_\_\_\_ [a period specified by the grantee of one, two, or three specific consecutive program years], shall principally benefit persons of low and moderate income in a manner that ensures that at least 70 percent of the amount is expended for activities that benefit such persons during the designated period.
- 3. Special Assessments. It will not attempt to recover any capital costs of public improvements assisted with CDBG funds, including Section 108 loan guaranteed funds, by assessing any amount against properties owned and occupied by persons of low and moderate income, including any fee charged or assessment made as a condition of obtaining access to such public improvements.

However, if CDBG funds are used to pay the proportion of a fee or assessment that relates to the capital costs of public improvements (assisted in part with CDBG funds) financed from other revenue sources, an assessment or charge may be made against the property with respect to the public improvements financed by a source other than CDBG funds.

In addition, in the case of properties owned and occupied by moderate-income (not low-income) families, an assessment or charge may be made against the property for public improvements financed by a source other than CDBG funds if the jurisdiction certifies that it lacks CDBG funds to cover the assessment.

### Excessive Force -- It has adopted and is enforcing:

- 1. A policy prohibiting the use of excessive force by law enforcement agencies within its jurisdiction against any individuals engaged in non-violent civil rights demonstrations; and
- 2. A policy of enforcing applicable State and local laws against physically barring entrance to or exit from a facility or location which is the subject of such non-violent civil rights demonstrations within its jurisdiction.

Compliance with Anti-discrimination laws -- The grant will be conducted and administered in conformity with title VI of the Civil Rights Act of 1964 (42 U.S.C. 2000d) and the Fair Housing Act (42 U.S.C. 3601-3619) and implementing regulations.

**Lead-Based Paint** -- Its activities concerning lead-based paint will comply with the requirements of 24 CFR Part 35, Subparts A, B, J, K and R.

Compliance with Laws -- It will comply with applicable laws.

1. Shawn Sherrouse

## **OPTIONAL Community Development Block Grant Certification**

Submit the following certification only when one or more of the activities in the action plan are designed to meet other community development needs having particular urgency as specified in 24 CFR 570.208(c):

The grantee hereby certifies that the Annual Plan includes one or more specifically identified CDBG-assisted activities which are designed to meet other community development needs having particular urgency because existing conditions pose a serious and immediate threat to the health or welfare of the community and other financial resources are not available to meet such needs.

8/9/2Z Date

M. Shawn Sherrouse

### **Specific HOME Certifications**

The HOME participating jurisdiction certifies that:

Tenant Based Rental Assistance -- If it plans to provide tenant-based rental assistance, the tenant-based rental assistance is an essential element of its consolidated plan.

Eligible Activities and Costs -- It is using and will use HOME funds for eligible activities and costs, as described in 24 CFR §§92.205 through 92.209 and that it is not using and will not use HOME funds for prohibited activities, as described in §92.214.

**Subsidy layering** -- Before committing any funds to a project, it will evaluate the project in accordance with the guidelines that it adopts for this purpose and will not invest any more HOME funds in combination with other Federal assistance than is necessary to provide affordable housing;

M. Shawn Sherrouse

### **Emergency Solutions Grants Certifications**

The Emergency Solutions Grants Program recipient certifies that:

Major rehabilitation/conversion/renovation – If an emergency shelter's rehabilitation costs exceed 75 percent of the value of the building before rehabilitation, the recipient will maintain the building as a shelter for homeless individuals and families for a minimum of 10 years after the date the building is first occupied by a homeless individual or family after the completed rehabilitation.

If the cost to convert a building into an emergency shelter exceeds 75 percent of the value of the building after conversion, the recipient will maintain the building as a shelter for homeless individuals and families for a minimum of 10 years after the date the building is first occupied by a homeless individual or family after the completed conversion.

In all other cases where ESG funds are used for renovation, the recipient will maintain the building as a shelter for homeless individuals and families for a minimum of 3 years after the date the building is first occupied by a homeless individual or family after the completed renovation.

Essential Services and Operating Costs – In the case of assistance involving shelter operations or essential services related to street outreach or emergency shelter, the recipient will provide services or shelter to homeless individuals and families for the period during which the ESG assistance is provided, without regard to a particular site or structure, so long the recipient serves the same type of persons (e.g., families with children, unaccompanied youth, disabled individuals, or victims of domestic violence) or persons in the same geographic area.

**Renovation** – Any renovation carried out with ESG assistance shall be sufficient to ensure that the building involved is safe and sanitary.

Supportive Services – The recipient will assist homeless individuals in obtaining permanent housing, appropriate supportive services (including medical and mental health treatment, victim services, counseling, supervision, and other services essential for achieving independent living), and other Federal State, local, and private assistance available for these individuals.

Matching Funds - The recipient will obtain matching amounts required under 24 CFR 576.201.

Confidentiality – The recipient has established and is implementing procedures to ensure the confidentiality of records pertaining to any individual provided family violence prevention or treatment services under any project assisted under the ESG program, including protection against the release of the address or location of any family violence shelter project, except with the written authorization of the person responsible for the operation of that shelter.

Homeless Persons Involvement – To the maximum extent practicable, the recipient will involve, through employment, volunteer services, or otherwise, homeless individuals and families in constructing, renovating, maintaining, and operating facilities assisted under the ESG program, in providing services assisted under the ESG program, and in providing services for occupants of facilities assisted under the program.

Consolidated Plan – All activities the recipient undertakes with assistance under ESG are consistent with its consolidated plan.

<b>Discharge Policy</b> – The recipient will estawhere appropriate, policies and protocols systems of care (such as health care facility or correction programs and institutions) in homelessness for these persons.	for the discharge of p ties, mental health fac	ersons from publicly funded institutions or ilities, foster care or other youth facilities,
N/A Signature of Authorized Official	Date	
Title		

## Housing Opportunities for Persons With AIDS Certifications

The HOPWA grantee certifies that:

**Activities** -- Activities funded under the program will meet urgent needs that are not being met by available public and private sources.

**Building** -- Any building or structure assisted under that program shall be operated for the purpose specified in the consolidated plan:

- 1. For a period of not less than 10 years in the case of assistance involving new construction, substantial rehabilitation, or acquisition of a facility,
- 2. For a period of not less than 3 years in the case of assistance involving non-substantial rehabilitation or repair of a building or structure.

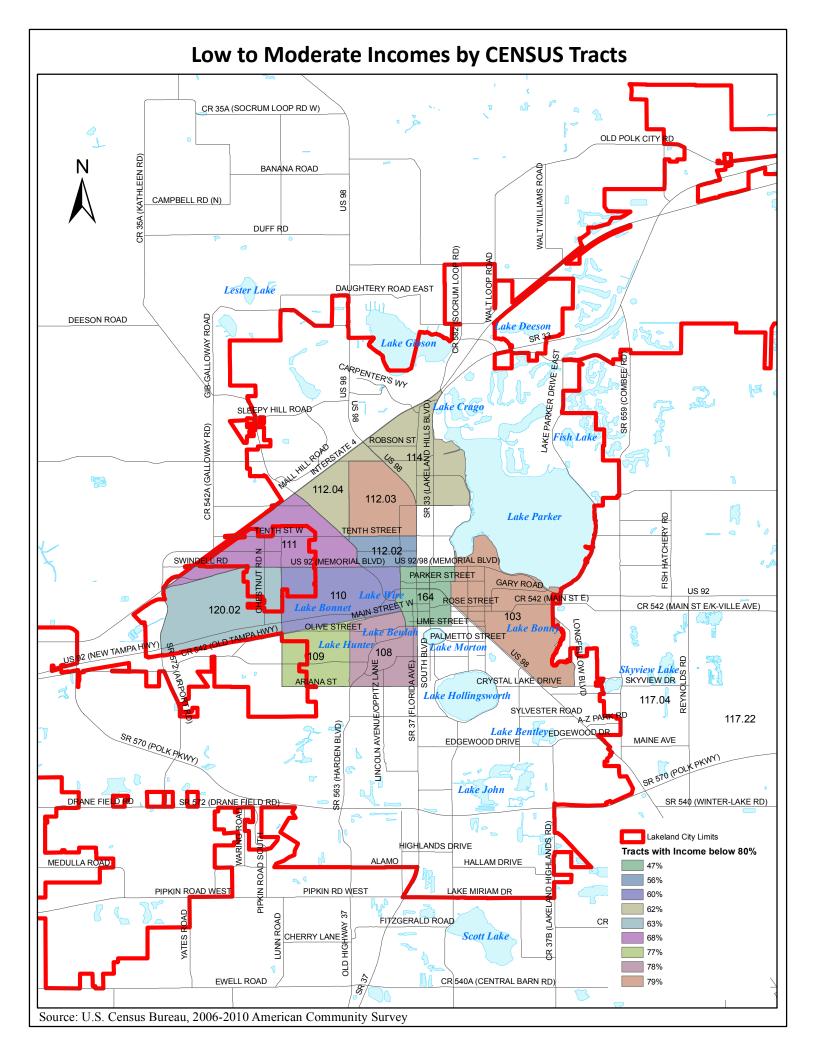
N/A	
Signature of Authorized Official	Date
Title	

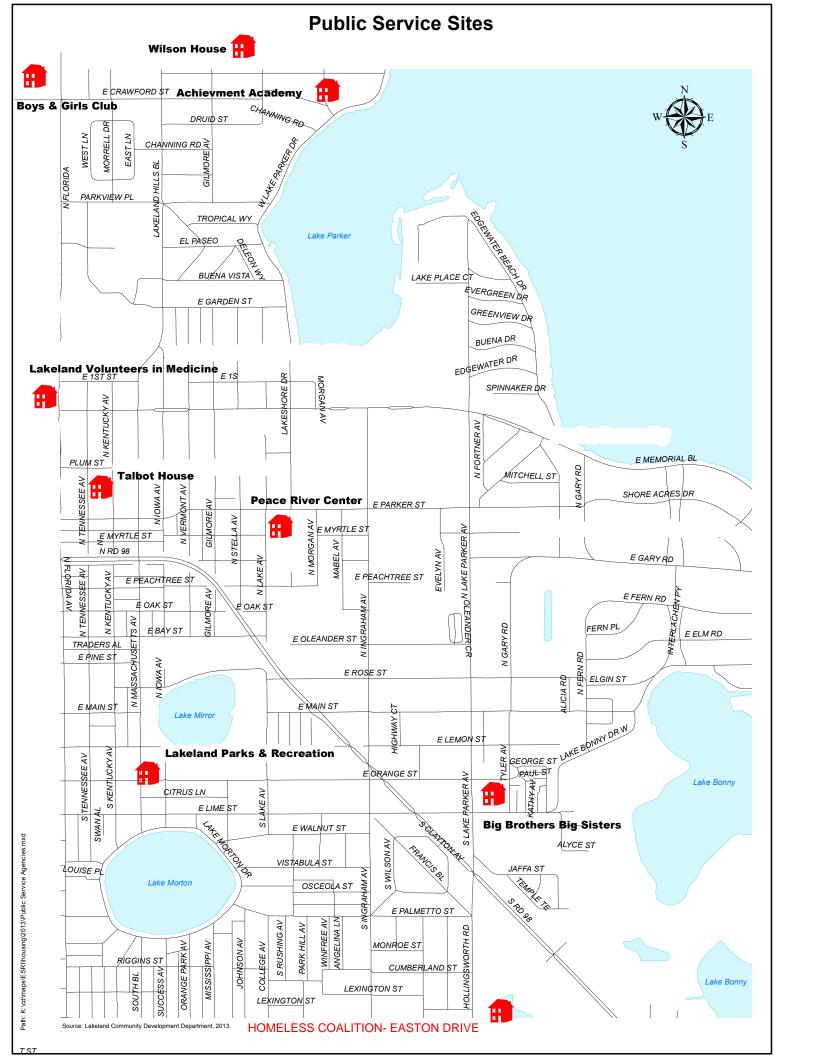
### APPENDIX TO CERTIFICATIONS

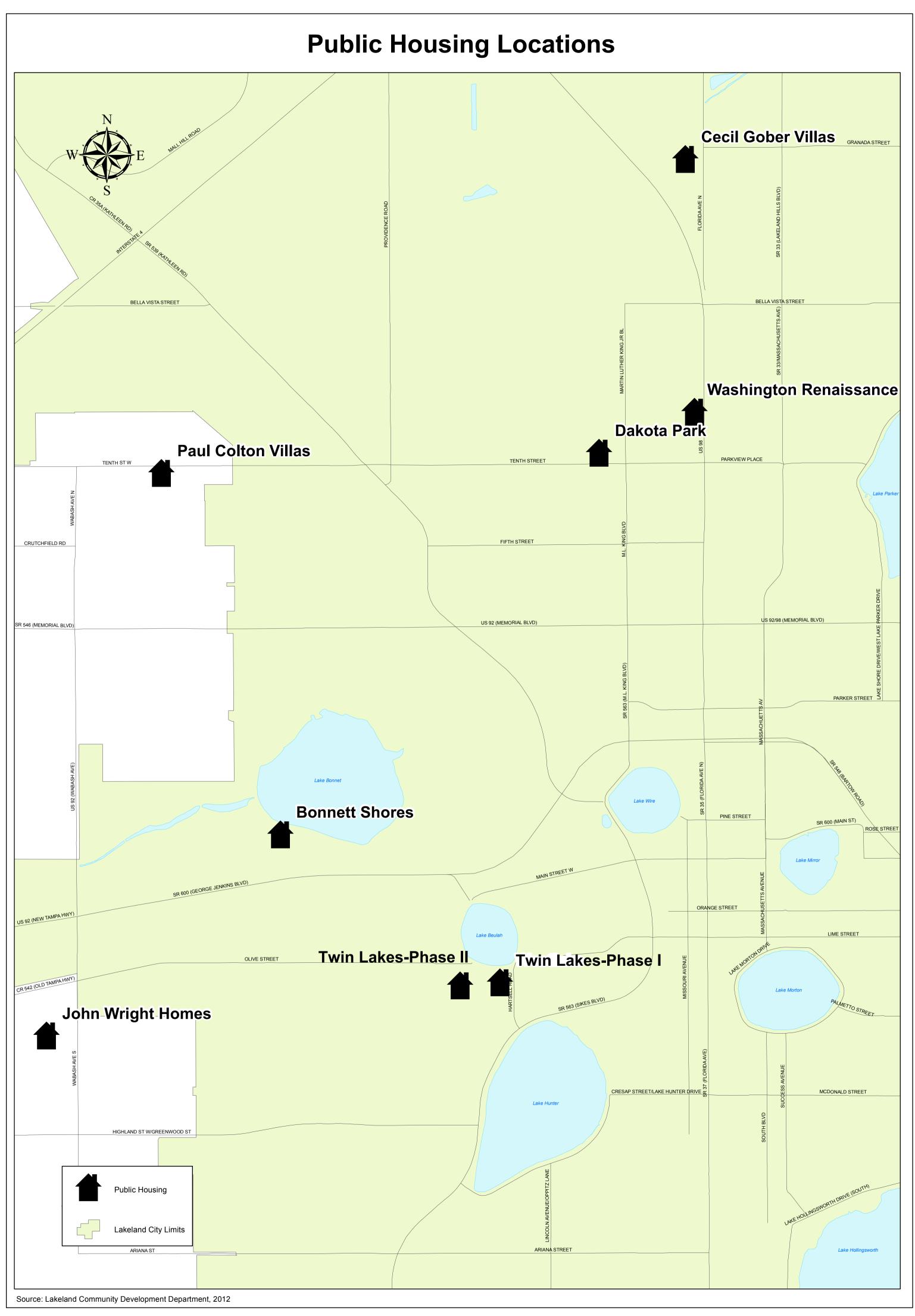
## INSTRUCTIONS CONCERNING LOBBYING CERTIFICATION:

## **Lobbying Certification**

This certification is a material representation of fact upon which reliance was placed when this transaction was made or entered into. Submission of this certification is a prerequisite for making or entering into this transaction imposed by section 1352, title 31, U.S. Code. Any person who fails to file the required certification shall be subject to a civil penalty of not less than \$10,000 and not more than \$100,000 for each such failure.



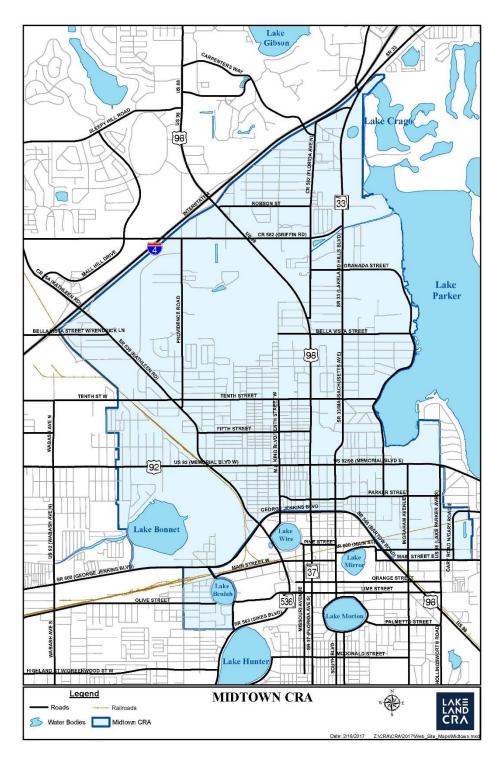






## COMMUNITY REDEVELOPMENT AGENCY

## **Exhibit A: Midtown District Map**



## **Central City Transit Supportive Area**

