



**NEIGHBORHOOD SERVICES DIVISION  
HOUSING SECTION**

44th Year Community Development Block Grant (CDBG) and  
24th Year HOME Investment Partnerships (HOME)

**ONE YEAR ACTION PLAN  
2018-2019**

**July 16, 2018**



EQUAL HOUSING  
OPPORTUNITY

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# Executive Summary

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

### 1. Introduction

The City of Lakeland Community Development Department – Neighborhood Service Division is awarded federal formula funds annually from the U. S. Department of Housing and Urban Development (HUD). 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. The Plan covers the period of October 1, 2018 through September 30, 2019. 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)

Programs and activities in this plan are intended to primarily benefit low and moderate income residents, neighborhoods with high concentrations of low and moderate income residents, and the city as a whole. HOPWA funds have been re-designated to the State of Florida Department of Health.

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

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

The 2018-19 Action Plan includes the three goals outlines below, all targeting community needs related to affordable housing, suitable living environment and expand economic opportunities. 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 homes 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 persons and/or families at risk of becoming homeless and those homeless to obtain affordable housing.

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

### **Outcomes**

- Improve safety and livability of neighborhoods;
- Improve housing and neighborhood conditions for homeowners and renters through code enforcement;
- Provide infrastructure improvements, including streets and sidewalks; and
- Increase access to quality facilities and services.

## **Objective # 3: Expand economic opportunities**

### **Outcomes**

- Empower low income persons to achieve self-sufficiency; and
- Assist in providing employment opportunities 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 community, there continues to be a major 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**

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

In the previous year, the City of Lakeland has shown major progress in its efforts to implement its programs. The City is in compliance with 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, if needed, with more energy efficient homes. The funds also assisted with Code Enforcement efforts and public services activities. The City has produced affordable housing units for first time homebuyers through its down payment assistance program.

The City has been 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**

Summary from citizen participation section of plan.

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.

At the May 14, 2018 public meeting, there were fifteen (15) community members in attendance as well as the District's Commissioner and City Manager. After the presentation, there were questions asked regarding the budget, a park for the local community and safety for children at the new local corner store. Staff answered the questions accordingly.

On May 24, 2018, an Affordable Housing Advisory Committee meeting was held. The prior year accomplishments were reviewed and the projected use of funds was outlined. There were questions regarding the proposed budget items. Staff replied.

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

No comments were made

## **7. Summary**

The Staff accepted the concerns and answered the questions presented from the public, interest community, City Management and City Commissioners. All expressed that they were pleased with the affordable housing programs with the assistance given to low income clients.

## 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 Dev/Neighborhood Services Division
HOME Administrator	LAKELAND	Community Dev/Neighborhood Services Division

**Table 1 – Responsible Agencies**

### Narrative (optional)

The Neighborhood Services Division (NSD) – Housing Section of the City of Lakeland, under the general direction of the Community Development Department, will be the lead agency for preparing and implementing the Plan. The Housing Section coordinated 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. Neighborhood Services Division has and will continue to create partnerships with non-profit developers, Community Housing Development Organizations (CHDOs), social service providers and other units of local government to expand the City’s ability to provide affordable housing and community development programs.

The Neighborhood Services 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.

Public meetings and hearings were held to obtain input from citizens and community leaders in preparing the Action Plan for 2018-2019. A list of the organizations contacted is included in Table 2.

The Neighborhood Services Division 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**

Inquiries, comments or complaints concerning the Consolidated Plan, any amendments or performance reports may be conveyed by contacting City staff at:

City of Lakeland

Neighborhood Services Division

1104 Martin L. King, Jr. Avenue

Lakeland, FL 33805

863/834-3360

863/834-6266 (fax)

[housing@lakelandgov.net](mailto:housing@lakelandgov.net)

Business hours: 8 am – 5 pm (Monday – Friday)



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

### **Introduction**

The Neighborhood Services Division, under the general direction of the Community Development Department will be the lead agency for preparing and implementing the Plan. The Neighborhood Services Division coordinated 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(l))**

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

Staff participates in various community meetings, throughout the county, such as Permanent Supportive Housing workshop. Staff meets regularly with groups such as the Homeless Coalition of Polk County. The City has an ongoing relationship with the Lakeland Housing Authority (LHA). The City also supports the LHA Self Sufficiency and Youth Build projects.

The City provides several health and social service agencies with CDBG and City general funds through the public/community service application process. The coordination and participation of the City are all efforts to improve service delivery and initiate systematic improvements for low income and underserved population.

### **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](http://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.

The City's Housing Section staff works closely with the Homeless Coalition's Director and is a member of the executive board committee. 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 awarded a RFP to consultant to strategize ways to assist the services delivered to the homeless population.

The City along with Polk County Housing and Neighborhood Development has entered into a contract to provide rapid re-housing State funds to individuals and families who are homeless or at risk of homelessness. This strategy will be serviced by a local non-profit agency. City Staff is also coordinating efforts with local agencies, HCPC, PHA's and COC to make efforts for more permanent supportive housing in the county.

Lack of funds to end chronic homelessness is one of the largest barriers to success. The current inventory in the Lakeland and Polk County Continuums of Care show that the majority of emergency and transitional housing shelter beds for individuals are located in Lakeland. Similar statistics exist with regards to families, 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, Keystone Challenge (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**

**Table 2 – Agencies, groups, organizations who participated**

1	<b>Agency/Group/Organization</b>	Lakeland Habitat for Humanity
	<b>Agency/Group/Organization Type</b>	Housing
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Stakeholder interview
2	<b>Agency/Group/Organization</b>	Homeless Coalition of Polk County
	<b>Agency/Group/Organization Type</b>	Services-homeless
	<b>What section of the Plan was addressed by Consultation?</b>	Homelessness Strategy
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Stakeholder interview
3	<b>Agency/Group/Organization</b>	Keystone Challenge Fund
	<b>Agency/Group/Organization Type</b>	Housing
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Stakeholder interview
4	<b>Agency/Group/Organization</b>	Lakeland Housing Authority
	<b>Agency/Group/Organization Type</b>	PHA
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment

	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Stakeholder interview
5	<b>Agency/Group/Organization</b>	Affordable Housing Advisory Committee
	<b>Agency/Group/Organization Type</b>	Services - Housing Social Services
	<b>What section of the Plan was addressed by Consultation?</b>	Public Housing Needs Community Development Needs
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Public meeting

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

N/A

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

<b>Name of Plan</b>	<b>Lead Organization</b>	<b>How do the goals of your Strategic Plan overlap with the goals of each plan?</b>
Continuum of Care	Homeless Coalition of Polk County	Goals do not overlap
City of Lakeland Ten Year Comprehensive Plan	City of Lakeland	Goals do not overlap
City of Lakeland CRA Plan	City of Lakeland	Goals do not overlap
LHA Five Year and Annual Plan	Lakeland Housing Authority	Goals do not overlap
Polk County Neighborhood Services Con Plan	Polk County Neighborhood Services Division	Goals do not overlap
Central Florida Planning Council	Regional Planning	Goals do not overlap

**Table 3 – Other local / regional / federal planning efforts**

**Narrative (optional)**

Neighborhood Services partners with many local non-profit agencies in the community. NSD also has a relationship with Polk County’s Housing and Neighborhood Development Office, in its efforts to support the goals of the provision of affordable, safe and sanitary housing; a suitable living environment, and expanded economic opportunities for low and moderate income persons.

NSD cooperates with other City departments to carry out the activities outlined in the Consolidated Plan. The City will continue to encourage relationships between other local municipalities, builders, developers, and advocates for low-income persons.

## **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 CDBG and 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.

#### **Amendments to Final Statement**

The City may decide not to carry out an activity described in the final statement, or to include an activity not previously described, or to substantially change the purpose, scope, location or beneficiaries of an activity. Prior to the City Commission taking action to amend the final statement, the Community Development Department shall require a public notice to be published in a local newspaper at least seven days prior providing citizens with notice and the opportunity to comment on the proposed amendment. The City Commission shall consider citizen comments and, if appropriate, may modify the proposed changes. In the event the Commission approves an amendment, the Department shall publish a public notice of the amended final statement.

#### **Substantial Change Criteria**

A substantial change includes the cancellation of a previously approved activity, the addition of an activity not previously described, or a change in the purpose, scope, location or beneficiaries of an activity. A substantial change as described above requires an amendment to the City's final statement. The City shall provide sufficient public notice and shall hold a public hearing where citizens will be given an opportunity to provide comments.

#### **Annual Performance Report**

Each year HUD requires that the City compile a Consolidated Annual Performance and Evaluation Report (CAPER) within 90 days of the end of the fiscal year. The report provides programmatic and financial data on the progress with which the federal grant programs were implemented during the fiscal year.

At least fifteen days prior to submitting the report to HUD, the City will publish a public notice in the local newspaper announcing the availability of the report for review by the public. After the public comment period, the City shall consider any comments received and a summary of the comments shall be attached to the report when submitted to HUD.

### **Efforts made to Broaden Public Participation**

The Neighborhood Services Division Staff attends and participates in different community forums throughout the year, such as Public Works Week. This informal method allows the staff to inform the public and organizations of our mission. Other Public meetings were held to obtain input from all sectors of the community.

Currently, there are no local newspapers for the African American or Hispanic neighborhoods. Over 250 postcards were mailed to the local minority community, public service agencies, and neighborhood associations and distributed to all interested city departments to announce the public meeting on May 14, 2018. Staff attends various meetings and service providers' activities to hear the needs and views of the community.

### Citizen Participation Outreach

Sort	Mode of Outreach	Target of Outreach	Summary of response /attendance	Summary of Comments received	Summary of comments not accepted and reasons	URL (if applicable)
1	News paper Ad	Non-targeted/ broad community	April 30, 2018. N/A	N/A	N/A	
2	Request for Proposal	Non Profit Organizations	February 12, 2018/29 applications received	N/A	N/A	
3	Public Meeting	Low income census tract community	May 14, 2018/ 17 attendees	Review of accomplishments for projected use of funds.  Inquiry on budget, need for park in local community and safety of children from neighborhood school. Staff answered and directed to correct department		



Sort	Mode of Outreach	Target of Outreach	Summary of response /attendance	Summary of Comments received	Summary of comments not accepted and reasons	URL (If applicable)
4	Public Meeting	Non-targeted/ broad community	May 24, 2018/5 Attendees	Inquiry on funding sources and how funds are distributed to each project.		
5	Internet Outreach	Non-targeted/ broad community	June 14 to July 13, 2018/ N/A	N/A	N/A	<a href="http://www.lakelandgov.net/departments/communitydevelopment/housing">http://www.lakelandgov.net/departments/communitydevelopment/housing</a>
6	Newspaper Ad	Non-targeted/ broad community	June 14, 2018	N/A	N/A	
7	Public Hearing	Non-targeted/ broad community	June 18, 2018/ Regular meeting	Commissioner inquired as to the number of citizens served in his district. Staff will provide report. City Officials expressed that programs were doing well.	N/A	

Sort	Mode of Outreach	Target of Outreach	Summary of response /attendance	Summary of Comments received	Summary of comments not accepted and reasons	URL (If applicable)
8	Public Hearing	Non-targeted/ broad community	July 16, 2018/ TBD	TBD	N/A	

**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 2018-2019 is \$977,622, and anticipates an amount of \$242,751 program income; in which the City is able to transfer from NSP3 program income to IDIS for CDBG eligible 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 \$419,174 and anticipates an approximate amount of \$5,000 for program income. The amount awarded for the State of Florida State Housing Initiatives Partnership (SHIP) program is \$150,191 for 2018-2019. There has been a considerable decrease in the state’s funding over the past few years: In 2017, it was a 33% decrease from 2016 and 2018 was substantial at 66% decrease from 2017. HOME and SHIP funds may be used for housing activities such as increasing homeownership, housing rehabilitation, housing rehabilitation administration of the City’s HOME and SHIP programs and CHDO support. The City’s General Fund and CRA funds may be utilized for impact fee reimbursements/waiver for multi-family housing developments.

#### Anticipated Resources

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
CDBG	public - federal	Acquisition Admin and Planning Economic Development Housing Public Improvements Public Services	977,622	242,751	300,000	1,520,373	3,040,746	Anticipated two-year average annual CDBG allocation

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
HOME	public - federal	Acquisition Homebuyer assistance Homeowner rehab Multifamily rental new construction Multifamily rental rehab New construction for ownership TBRA	419,174	5,000	0	424,174	848,348	Anticipated two-year average annual HOME allocation

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 Neighborhood Services Division seeks other grant funding sources to leverage with existing state, federal and general funds. The City was awarded \$2,005,781 in 2009 and \$1,303,139 in 2011 from 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. Staff has closed out the NSP3 grant with approximately \$242,000 available to be expended on eligible community development 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 \$150,191 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**

The City does not plan to use city-owned property to address the needs identified in this plan.

**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 City also allocates local funds to public services agencies along with waiving local non-utility impact fees for multi-family housing developments.

## Annual Goals and Objectives

### AP-20 Annual Goals and Objectives

#### Goals Summary Information

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
1	Affordable Housing	2015	2019	Affordable Housing	City Wide	Preserve and maintain affordable housing	CDBG: \$1,192,445 HOME: \$244,381	Homeowner Housing Rehabilitated: 23 Household Housing Unit
2	Quality of life	2015	2019	Non-Housing Community Development	City Wide Code enforcement	Code Enforcement Safety of Neighborhoods Infrastructure Improvements Facilities and Services	CDBG: \$202,928 HOME: \$0	Public service activities other than Low/Moderate Income Housing Benefit: 3000 Persons Assisted Housing Code Enforcement/Foreclosed Property Care: 2928 Household Housing Unit
3	Self Sufficiency	2015	2019	Affordable Housing	City Wide	Preserve and maintain affordable housing Increase homeownership	CDBG: \$0 HOME: \$137,876	Direct Financial Assistance to Homebuyers: 5 Households Assisted

**Table 6 – Goals Summary**

## Goal Descriptions

<b>1</b>	<b>Goal Name</b>	Affordable Housing
	<b>Goal Description</b>	Quality affordable housing, Temporary relocation, clearance and demolition, Housing Rehab Delivery
<b>2</b>	<b>Goal Name</b>	Quality of life
	<b>Goal Description</b>	Code enforcement, blight and elimination, Public Services
<b>3</b>	<b>Goal Name</b>	Self Sufficiency
	<b>Goal Description</b>	Affordable Housing, Home Purchase Assistance, Community Housing Development Organization

# Projects

## AP-35 Projects – 91.220(d)

### Introduction

The City of Lakeland’s Action Plan outlines its planned actions for the 2018-2019 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 Neighborhood Services Division, under the direction of the Community 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 and home purchase assistance 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 Rehabilitation
2	Home Purchase Assistance-HOME funds
3	Temporary Relocation
4	Clearance and Demolition
5	Housing Rehabilitation Staff-Activity Delivery
6	Code Enforcement
7	General Program Administration
8	Community Housing Development Organization
9	Simpson Park Summer Recreation Program
10	Coleman Bush Building Summer Tutoring
11	Coleman Bush Building Fall Tutoring
12	Coleman Bush After School Youth Programs
13	Simpson Park Art Classes
14	Simpson Park Dance Lesson
15	Simpson Park Summer Swimming Lessons
16	Boys and Girls Club Summer and After School Programs
17	Lakeland Volunteers in Medicine
18	Sunrise Community of Polk County
19	Talbot House Ministries
20	The Salvation Army
21	Volunteers in Service to the Elderly (VISTE)

**Table 7 - 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. Input from 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. During the 2018-2019 RFP process, the City received funding proposals for requesting over \$1.7 million, in which only an estimated \$1.4 million was projected to be available.

# AP-38 Project Summary

## Project Summary Information

1	<b>Project Name</b>	Owner Occupied Rehabilitation
	<b>Target Area</b>	City Wide
	<b>Goals Supported</b>	Affordable Housing
	<b>Needs Addressed</b>	Preserve and maintain affordable housing
	<b>Funding</b>	CDBG: \$1,002,445 HOME: \$244,381
	<b>Description</b>	Housing program provides major rehabilitation and emergency repair for owner-occupied housing for low income home buyers.
	<b>Target Date</b>	9/30/2019
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	Eighteen (18) low income households
	<b>Location Description</b>	City of Lakeland, FL, City limits
	<b>Planned Activities</b>	Single unit detached housing rehabilitation
2	<b>Project Name</b>	Home Purchase Assistance-HOME funds
	<b>Target Area</b>	City Wide
	<b>Goals Supported</b>	Self Sufficiency
	<b>Needs Addressed</b>	Preserve and maintain affordable housing
	<b>Funding</b>	HOME: \$75,000
	<b>Description</b>	Provide down payment and closing cost assistance to low income home buyers. Homes purchased must be within the city limits of Lakeland.
	<b>Target Date</b>	9/30/2019
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	Five (5) low income families
	<b>Location Description</b>	1140 Martin L. King Jr. Ave., Lakeland, FL 33805
	<b>Planned Activities</b>	Down payment and closing cost assistance

3	<b>Project Name</b>	Temporary Relocation
	<b>Target Area</b>	City Wide
	<b>Goals Supported</b>	Affordable Housing
	<b>Needs Addressed</b>	Preserve and maintain affordable housing
	<b>Funding</b>	CDBG: \$10,000
	<b>Description</b>	Temporary relocation for clients benefiting from the city's owner-occupied rehabilitation.
	<b>Target Date</b>	9/30/2019
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	Eight (8) low income households
	<b>Location Description</b>	1140 Martin L. King Jr. Ave., Lakeland, FL 33805
	<b>Planned Activities</b>	Temporary relocation assistance for clients benefiting from the City's owner-occupied rehabilitation program.
4	<b>Project Name</b>	Clearance and Demolition
	<b>Target Area</b>	City Wide
	<b>Goals Supported</b>	Quality of life
	<b>Needs Addressed</b>	Preserve and maintain affordable housing
	<b>Funding</b>	CDBG: \$5,000
	<b>Description</b>	Clearance, demolition and removal of accessory building and improvement including movement of structure to other sites.
	<b>Target Date</b>	9/30/2019
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	Two (2) low income households
	<b>Location Description</b>	1140 Martin L. King Jr. Ave., Lakeland, FL 33805
	<b>Planned Activities</b>	Clearance and demolition for blighted properties
5	<b>Project Name</b>	Housing Rehabilitation Staff-Activity Delivery
	<b>Target Area</b>	City Wide

	<b>Goals Supported</b>	Affordable Housing
	<b>Needs Addressed</b>	Preserve and maintain affordable housing
	<b>Funding</b>	CDBG: \$175,000
	<b>Description</b>	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.
	<b>Target Date</b>	9/30/2019
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	Eighteen (18) low income families
	<b>Location Description</b>	N/A
	<b>Planned Activities</b>	Housing Rehabilitation Staff Activity Delivery
<b>6</b>	<b>Project Name</b>	Code Enforcement
	<b>Target Area</b>	Code enforcement
	<b>Goals Supported</b>	Quality of life
	<b>Needs Addressed</b>	Preserve and maintain affordable housing
	<b>Funding</b>	CDBG: \$72,132
	<b>Description</b>	Code Enforcement as it relates to demolition, housing and environmental code violations, fire inspections, overgrowth/care of premises, and abandoned vehicles.
	<b>Target Date</b>	9/30/2019
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	Two thousand nine hundred twenty eight (2,928) City of Lakeland residents in targeted census tracts
	<b>Location Description</b>	City of Lakeland, FL- Census Tracts 110, 111, 112.02, 112.03, 112.04 and South ½ of 113, 120.02 & 164
<b>Planned Activities</b>	Costs incurred for inspection code of violations and enforcement of codes.	
<b>7</b>	<b>Project Name</b>	General Program Administration
	<b>Target Area</b>	City Wide

	<b>Goals Supported</b>	Affordable Housing
	<b>Needs Addressed</b>	Preserve and maintain affordable housing
	<b>Funding</b>	CDBG: \$125,000 HOME: \$41,917
	<b>Description</b>	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.
	<b>Target Date</b>	9/30/2019
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	Eightteen (18) low income households
	<b>Location Description</b>	1140 Martin L. King Jr. Ave., Lakeland, FL 33805
	<b>Planned Activities</b>	Administration of rehabilitation projects
8	<b>Project Name</b>	Community Housing Development Organization
	<b>Target Area</b>	City Wide
	<b>Goals Supported</b>	Self Sufficiency
	<b>Needs Addressed</b>	Preserve and maintain affordable housing
	<b>Funding</b>	HOME: \$62,876
	<b>Description</b>	Housing acquisition and rehabilitation/reconstruction
	<b>Target Date</b>	9/30/2019
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	One (1) low income family
	<b>Location Description</b>	1140 Martin L. King Jr. Ave., Lakeland, FL 33805
<b>Planned Activities</b>	Reconstruction or rehabilitation of a single-family unit.	
9	<b>Project Name</b>	Simpson Park Summer Recreation Program
	<b>Target Area</b>	City Wide

	<b>Goals Supported</b>	Quality of life
	<b>Needs Addressed</b>	Facilities and Services
	<b>Funding</b>	CDBG: \$25,546
	<b>Description</b>	This structured summer recreation program provided by the City of Lakeland's Parks and Recreation Department will provide activities for the youth.
	<b>Target Date</b>	9/30/2019
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	One hundred (100) low income children
	<b>Location Description</b>	1725 Martin L. King Jr. Ave., Lakeland, FL 33805
	<b>Planned Activities</b>	Youth Summer Camp
<b>10</b>	<b>Project Name</b>	Coleman Bush Building Summer Tutoring
	<b>Target Area</b>	City Wide
	<b>Goals Supported</b>	Quality of life
	<b>Needs Addressed</b>	Facilities and Services
	<b>Funding</b>	CDBG: \$3,200
	<b>Description</b>	Summer tutoring for low income households
	<b>Target Date</b>	9/30/2019
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	Fifty (50) low income children
	<b>Location Description</b>	1104 Martin L. King Jr. Ave., Lakeland, FL 33805
	<b>Planned Activities</b>	Summer tutoring
<b>11</b>	<b>Project Name</b>	Coleman Bush Building Fall Tutoring
	<b>Target Area</b>	City Wide
	<b>Goals Supported</b>	Quality of life
	<b>Needs Addressed</b>	Facilities and Services
	<b>Funding</b>	CDBG: \$11,300

	<b>Description</b>	After school tutoring for low income households
	<b>Target Date</b>	9/30/2019
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	Sixty (60) low income children
	<b>Location Description</b>	1104 Martin L. King Jr. Ave., Lakeland, FL 33805
	<b>Planned Activities</b>	After school tutoring
<b>12</b>	<b>Project Name</b>	Coleman Bush After School Youth Programs
	<b>Target Area</b>	City Wide
	<b>Goals Supported</b>	Quality of life
	<b>Needs Addressed</b>	Facilities and Services
	<b>Funding</b>	CDBG: \$3,150
	<b>Description</b>	After school dance, keyboard and Taekwondo Classes
	<b>Target Date</b>	9/30/2019
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	Eleven (11) low income children
	<b>Location Description</b>	1104 Martin L. King Jr. Ave., Lakeland, FL 33805
	<b>Planned Activities</b>	Youth Activities
<b>13</b>	<b>Project Name</b>	Simpson Park Art Classes
	<b>Target Area</b>	City Wide
	<b>Goals Supported</b>	Quality of life
	<b>Needs Addressed</b>	Facilities and Services
	<b>Funding</b>	CDBG: \$2,740
	<b>Description</b>	After school art classes
	<b>Target Date</b>	9/30/2019

	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	Two hundred fifty (250) low income children
	<b>Location Description</b>	1104 Martin L. King Jr. Ave., Lakeland, FL 33805
	<b>Planned Activities</b>	After School art classes
<b>14</b>	<b>Project Name</b>	Simpson Park Dance Lesson
	<b>Target Area</b>	City Wide
	<b>Goals Supported</b>	Quality of life
	<b>Needs Addressed</b>	Facilities and Services
	<b>Funding</b>	CDBG: \$2,180
	<b>Description</b>	Dance classes
	<b>Target Date</b>	9/30/2019
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	Two hundred fifty (250) low income children
	<b>Location Description</b>	1104 Martin L. King Jr. Ave., Lakeland, FL 33805
	<b>Planned Activities</b>	Dance classes for youth
<b>15</b>	<b>Project Name</b>	Simpson Park Summer Swimming Lessons
	<b>Target Area</b>	City Wide
	<b>Goals Supported</b>	Quality of life
	<b>Needs Addressed</b>	Facilities and Services
	<b>Funding</b>	CDBG: \$4,200
	<b>Description</b>	Swim Classes
	<b>Target Date</b>	9/30/2019
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	One hundred five (105) low income children
	<b>Location Description</b>	1725 Martin L. King Jr. Ave., Lakeland, FL 33805



	<b>Planned Activities</b>	Swimming lessons for youth
<b>16</b>	<b>Project Name</b>	Boys and Girls Club Summer and After School Programs
	<b>Target Area</b>	City Wide
	<b>Goals Supported</b>	Quality of life
	<b>Needs Addressed</b>	Facilities and Services
	<b>Funding</b>	CDBG: \$10,000
	<b>Description</b>	Programs proved a safe environment with the summer camp and after school program for low income, at risk youth at two (2) locations.
	<b>Target Date</b>	9/30/2019
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	Eighty (80) at risk youth
	<b>Location Description</b>	1505 Martin L. King Jr. Ave., Lakeland, FL 33805
	<b>Planned Activities</b>	Summer camp and after school programs for children
<b>17</b>	<b>Project Name</b>	Lakeland Volunteers in Medicine
	<b>Target Area</b>	City Wide
	<b>Goals Supported</b>	Quality of life
	<b>Needs Addressed</b>	Facilities and Services
	<b>Funding</b>	CDBG: \$22,500
	<b>Description</b>	A Non-profit agency provides medical care for the working uninsured with volunteers.
	<b>Target Date</b>	9/30/2019
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	One thousand (1000) low income working uninsured
	<b>Location Description</b>	1021 Lakeland Hills Blvd., Lakeland, FL 33805
	<b>Planned Activities</b>	Healthcare for the working uninsured
<b>18</b>	<b>Project Name</b>	Sunrise Community of Polk County
	<b>Target Area</b>	City Wide

	<b>Goals Supported</b>	Quality of life
	<b>Needs Addressed</b>	Facilities and Services
	<b>Funding</b>	CDBG: \$3,480
	<b>Description</b>	Improve and revitalize homes for aging adults with disabilities and cerebral palsy
	<b>Target Date</b>	9/30/2019
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	Eight (8) aging adults with developmental disabilities and cerebral palsy
	<b>Location Description</b>	940 Alicia Rd., Lakeland, FL 33801
	<b>Planned Activities</b>	Improve and revitalize homes
<b>19</b>	<b>Project Name</b>	Talbot House Ministries
	<b>Target Area</b>	City Wide
	<b>Goals Supported</b>	Quality of life
	<b>Needs Addressed</b>	Facilities and Services
	<b>Funding</b>	CDBG: \$10,000
	<b>Description</b>	Help pay utility costs
	<b>Target Date</b>	9/30/2019
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	One Hundred Eighty (180) homeless individuals
	<b>Location Description</b>	3800 Kathleen Rd, Lakeland, FL 33810
	<b>Planned Activities</b>	Assist with utility costs
<b>20</b>	<b>Project Name</b>	The Salvation Army
	<b>Target Area</b>	City Wide
	<b>Goals Supported</b>	Quality of life
	<b>Needs Addressed</b>	Facilities and Services
	<b>Funding</b>	CDBG: \$10,000

	<b>Description</b>	Case management and financial assistance to homeless families with children to create stability and self sufficiency.
	<b>Target Date</b>	9/30/2019
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	Forty (40) homeless families with children
	<b>Location Description</b>	3800 Kathleen Rd, Lakeland, FL 33810
	<b>Planned Activities</b>	Case management and financial assistance
21	<b>Project Name</b>	Volunteers in Service to the Elderly (VISTE)
	<b>Target Area</b>	City Wide
	<b>Goals Supported</b>	Quality of life
	<b>Needs Addressed</b>	Facilities and Services
	<b>Funding</b>	CDBG: \$22,500
	<b>Description</b>	Agency working with volunteers to prepare and deliver hot meals to low income, home bound elderly residents.
	<b>Target Date</b>	9/30/2019
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	Two hundred (200) low income elderly
	<b>Location Description</b>	1232 E. Magnolia St., Lakeland, FL 33801
	<b>Planned Activities</b>	Deliver hot meals to elderly

## **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 low to moderate income.

Although the City of Lakeland’s programs are city wide, the vast majority of funds are spent within the census tracts outlined in colors in the map. For PY 2018-2019 as in prior years, Neighborhood Services Division anticipates expending the majority of the funds in the census tracts through various housing programs and public services activities.

### **Geographic Distribution**

<b>Target Area</b>	<b>Percentage of Funds</b>
City Wide	100
Code enforcement	7

**Table 8 - 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 low- and 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 and public supportive services to benefit the low to moderate income clients citywide.

# Affordable Housing

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

### Introduction

Neighborhood Services 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.

Neighborhood Services 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	0
Non-Homeless	17
Special-Needs	2
Total	19

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

One Year Goals for the Number of Households Supported Through	
Rental Assistance	0
The Production of New Units	0
Rehab of Existing Units	19
Acquisition of Existing Units	5
Total	24

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

### Discussion

The City will concentrate its efforts on owner occupied rehabilitation due to the age of existing stock, home purchase assistance to assist families with self-sufficiency and public supportive services to benefit the low to moderate income clients citywide. Neighborhood Services has reconstructed fifteen (15) home built in 1925, since 2013.

## **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 offers the Family Self-Sufficiency and Youth Build Programs 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-profits 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. The mission of the Family Self-Sufficiency program is achieved through the coordination and the broadening of the existing resources to help low- and moderate-income persons to become economically independent and self-sufficient.

Neighborhood Services 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. Staff is part of the board of YouthBuild and the City’s official signs off on LHA’s certifications of consistency for their programs. The City's staff did assist the LHA in its environmental review process for its proposed senior apartments.

## **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**

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 the needs over the next five years.
- Work with Polk County to determine if 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 strategy to address this issue is to:

- Increase funding for rapid re-housing by working with GiveWell, the community foundation serving Lakeland, to make rapid re-housing projects a funding priority.
- Prioritize rapid re-housing for CoC funding.
- Provide rapid re-housing with State funding.
- Evaluate current CoC transitional housing programs serving families for re-allocation of funding

toward rapid re-housing.

- Continue to pursue State of Florida and private funding for rapid re-housing projects.
- Working with other agencies to bring permanent supportive housing into Polk County.
- CoC to work with Public Housing Authorities on Section 8 and rapid re-housing.

**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 strategy to address this issue is 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.
- Work with landlords to identify stability issues early and effective interventions to keep client housed.
- CoC develops and monitors CoC-wide goals emphasizing housing retention outcomes with results reported in annual performance-based rankings.
- CoC monitors provider housing stability providing technical assistance to poor performers as needed.
- Connect prevention programs coordinated entry allowing households to quickly access the services they need without having to call multiple programs.
- Pursue increased funding for homeless prevention projects including Florida Department of Children and Families Homeless Prevention Grant.
- A local housing developer, Aida Palms, has set aside five (5) units for a non-profit agency to accommodate person with special needs.

## **Discussion**

The City supports the efforts of the homeless community with the support of the public service agencies. The City and Polk County have entered into an interlocal agreement to provide rapid-rehousing assistance. The City's Mayor has also revitalized the Mayor's Taskforce to End Homelessness and issued and awarded an RFP for consultants to research efforts to best serve the homeless population. The consulting agency has set forth a timeline with goals for the City to concentrate its efforts on. There are short, medium and

long-term recommendations. The special needs community is supported with the financial awards to public agencies and waiver of impact fees for special needs projects.



## **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 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 interlocal 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.

**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 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.
- Eligibility for additional incentives that may be approved by the Affordable Housing Review Committee, including reduced road widths, and modifications in curbing, parking, or other site improvement features.

**Code Enforcement**-The Code Enforcement Section of the Neighborhood Services Division 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 system that allows the tracking of code violations by Census Tract.

**Urban Homesteading Program**-As a strategy to promote infill housing development in some of Lakeland’s

most distressed neighborhoods, the Urban Homesteading Program was developed. On vacant buildable residential lots, the City shall continue to aggressively pursue title and marketability through foreclosure of special assessment liens and quiet title action. Funding for this effort is derived from the General Fund. The City shall maintain a list of City owned vacant lots suitable for single family construction where the property has marketable title and all back taxes have been paid in full. These lots shall be available for Urban Homesteading.

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 Neighborhood Services 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; have been reduced by 75% this program year.

The obstacles to meeting housing needs revolve primarily around the rising cost of housing and need for additional affordable housing. While housing quality and non-housing factors play a role in the city's housing needs, housing cost burden is by far the leading challenge in the market. Moreover, the limited supply and rising cost of housing makes challenges like homelessness and living wages for low income households even more difficult to address.

### **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.

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 down payment assistance.

The local Community Redevelopment Agency has strategies in the planning stage for neighborhood wide rehabilitation program regardless of income. The CRA started construction on a plot of land for twenty-five units of single family homes located in a low income census tract for low to moderate income

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. Qualified testers and risk assessment contractors are utilized for the work to be completed for lead based paint stabilization, detection, and abatement using safe work practices. HUD's lead-based paint regulations and requirements are fully incorporated into all of the City's rehabilitation and homebuyer activities.

### **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's single family rehab program helps lower income owners make needed repairs, which enables them to remain in their affordable homes.

The Neighborhood Services 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 has 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.

City and Polk County have a contract with a local non-profit agency to provide rental and security deposits

for households 30% and below of the Area Median Income.

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 N/A**

### **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 nonprofits and private sector. Neighborhood Services Staff will continue to participate in events and planning sessions of the local housing authority, private housing developers and health and social service agencies.

Staff makes every effort to attend various community meetings throughout Polk County. 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 child care, 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.

1. The total amount of program income that will have been received before the start of the next program year and that has not yet been reprogrammed	242,751,
2. The amount of proceeds from section 108 loan guarantees that will be used during the year to address the priority needs and specific objectives identified in the grantee's strategic plan.	0
3. The amount of surplus funds from urban renewal settlements	0
4. The amount of any grant funds returned to the line of credit for which the planned use has not been included in a prior statement or plan	0
5. The amount of income from float-funded activities	0
<b>Total Program Income:</b>	<b>242,751</b>

#### Other CDBG Requirements

1. The amount of urgent need activities	0
-----------------------------------------	---

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

**HOME Investment Partnership Program (HOME)  
Reference 24 CFR 91.220(l)(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 loans.

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 entire 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:

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:

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

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.

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



Application for Federal Assistance SF-424	
<b>* 1. Type of Submission:</b> <input type="checkbox"/> Preapplication <input checked="" type="checkbox"/> Application <input type="checkbox"/> Changed/Corrected Application	
<b>* 2. Type of Application:</b> <input type="checkbox"/> New <input checked="" type="checkbox"/> Continuation <input type="checkbox"/> Revision	
<b>* If Revision, select appropriate letter(s):</b> _____ <b>* Other (Specify):</b> _____	
<b>* 3. Date Received:</b> _____	<b>4. Applicant Identifier:</b> _____
<b>5a. Federal Entity Identifier:</b> B-18-MC-12-0011	<b>5b. Federal Award Identifier:</b> _____
<b>State Use Only:</b>	
<b>6. Date Received by State:</b> _____	<b>7. State Application Identifier:</b> _____
<b>8. APPLICANT INFORMATION:</b>	
<b>* a. Legal Name:</b> City of Lakeland, Florida	
<b>* b. Employer/Taxpayer Identification Number (EIN/TIN):</b> 59-6000354	<b>* c. Organizational DUNS:</b> 0209979120000
<b>d. Address:</b>	
<b>* Street1:</b> 228 S Massachusetts	_____
<b>Street2:</b>	_____
<b>* City:</b> Lakeland	_____
<b>County/Parish:</b> Polk	_____
<b>* State:</b>	FL: Florida
<b>Province:</b>	_____
<b>* Country:</b>	USA: UNITED STATES
<b>* Zip / Postal Code:</b> 33801-5012	_____
<b>e. Organizational Unit:</b>	
<b>Department Name:</b> Community Development	<b>Division Name:</b> Neighborhood Services
<b>f. Name and contact information of person to be contacted on matters involving this application:</b>	
<b>Prefix:</b> Mrs.	<b>* First Name:</b> Annie
<b>Middle Name:</b> L.	_____
<b>* Last Name:</b> Gibson	_____
<b>Suffix:</b>	_____
<b>Title:</b> Housing Programs Supervisor	
<b>Organizational Affiliation:</b> _____	
<b>* Telephone Number:</b> 863/834-3360	<b>Fax Number:</b> 863/834-6266
<b>* Email:</b> annie.gibson@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 and Urban Development

**11. Catalog of Federal Domestic Assistance Number:**

14-218

CFDA Title:

Community Development Block Grant

**\* 12. Funding Opportunity Number:**

\* Title:

**13. Competition Identification Number:**

Title:

**14. Areas Affected by Project (Cities, Counties, States, etc.):**

MAPS .pdf

Add Attachment

Delete Attachment

View Attachment

**\* 15. Descriptive Title of Applicant's Project:**

Citywide Affordable Housing Programs

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

\* b. Program/Project

Attach an additional list of Program/Project Congressional Districts if needed.

**17. Proposed Project:**

\* a. Start Date:

\* b. End Date:

**18. Estimated Funding (\$):**

* a. Federal	<input type="text" value="977,622.00"/>
* b. Applicant	<input type="text"/>
* c. State	<input type="text"/>
* d. Local	<input type="text"/>
* e. Other	<input type="text"/>
* f. Program Income	<input type="text" value="242,751.00"/>
* g. TOTAL	<input type="text" value="1,220,373.00"/>

**\* 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

**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:  \* First Name:   
Middle Name:   
\* Last Name:   
Suffix:

\* Title:

\* Telephone Number:  Fax Number:

\* Email:

\* Signature of Authorized Representative: 

\* Date Signed:

Anthony Delgado

Application for Federal Assistance SF-424		
<b>* 1. Type of Submission:</b> <input type="checkbox"/> Preapplication <input checked="" type="checkbox"/> Application <input type="checkbox"/> Changed/Corrected Application	<b>* 2. Type of Application:</b> <input type="checkbox"/> New <input checked="" type="checkbox"/> Continuation <input type="checkbox"/> Revision	<b>* If Revision, select appropriate letter(s):</b> _____ <b>* Other (Specify):</b> _____
<b>* 3. Date Received:</b> _____	<b>4. Applicant Identifier:</b> _____	
<b>5a. Federal Entity Identifier:</b> B-18-MC-12-0228	<b>5b. Federal Award Identifier:</b> _____	
<b>State Use Only:</b>		
<b>6. Date Received by State:</b> _____	<b>7. State Application Identifier:</b> _____	
<b>8. APPLICANT INFORMATION:</b>		
<b>* a. Legal Name:</b> City of Lakeland, FL		
<b>* b. Employer/Taxpayer Identification Number (EIN/TIN):</b> 59-6000354	<b>* c. Organizational DUNS:</b> 0209979120000	
<b>d. Address:</b>		
<b>* Street1:</b> 228 S Massachusetts Ave	_____	
<b>Street2:</b>	_____	
<b>* City:</b> Lakeland	_____	
<b>County/Parish:</b> Polk	_____	
<b>* State:</b>	FL: Florida	
<b>Province:</b>	_____	
<b>* Country:</b>	USA: UNITED STATES	
<b>* Zip / Postal Code:</b> 33801-5012	_____	
<b>e. Organizational Unit:</b>		
<b>Department Name:</b> Community Development	<b>Division Name:</b> Neighborhood Services	
<b>f. Name and contact information of person to be contacted on matters involving this application:</b>		
<b>Prefix:</b> Mrs.	<b>* First Name:</b> Annie	_____
<b>Middle Name:</b> L.	_____	
<b>* Last Name:</b> Gibson	_____	
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<b>Title:</b> Housing Programs Supervisor		
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**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:**

14.239

CFDA Title:

HOME Investment Partnerships

**\* 12. Funding Opportunity Number:**

\* Title:

**13. Competition Identification Number:**

Title:

**14. Areas Affected by Project (Cities, Counties, States, etc.):**

MAPS.pdf

Add Attachment

Delete Attachment

View Attachment

**\* 15. Descriptive Title of Applicant's Project:**

Citywide Affordable Housing Programs

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

\* b. Program/Project

Attach an additional list of Program/Project Congressional Districts if needed.

**17. Proposed Project:**

\* a. Start Date:

\* b. End Date:

**18. Estimated Funding (\$):**

* a. Federal	<input type="text" value="419,174.00"/>
* b. Applicant	<input type="text"/>
* c. State	<input type="text" value="94,314.15"/>
* d. Local	<input type="text"/>
* e. Other	<input type="text"/>
* f. Program Income	<input type="text" value="5,000.00"/>
* g. TOTAL	<input type="text" value="518,488.15"/>

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- 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.
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- Yes  No

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**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:  \* First Name:   
Middle Name:   
\* Last Name:   
Suffix:

\* Title:

\* Telephone Number:  Fax Number:

\* Email:

\* Signature of Authorized Representative: 

\* Date Signed:

## ASSURANCES - CONSTRUCTION PROGRAMS

OMB Number: 4040-0009  
Expiration Date: 01/31/2019

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.

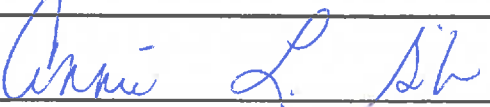
**PLEASE DO NOT RETURN YOUR COMPLETED FORM TO THE OFFICE OF MANAGEMENT AND BUDGET. SEND IT TO THE ADDRESS PROVIDED BY THE SPONSORING AGENCY.**

**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:

1. 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.
2. 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.
4. Will comply with the requirements of the assistance awarding agency with regard to the drafting, review and approval of construction plans and specifications.
5. 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.
6. Will initiate and complete the work within the applicable time frame after receipt of approval of the awarding agency.
7. 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.
8. 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).
9. 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 non-discrimination. 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 statute(s) under which application for Federal assistance is being made; and (j) the requirements of any other nondiscrimination statute(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).
16. 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.
17. 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."
19. 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.

<b>SIGNATURE OF AUTHORIZED CERTIFYING OFFICIAL</b> 	<b>TITLE</b> Housing Programs Supervisor
<b>APPLICANT ORGANIZATION</b> City of Lakeland, FL	<b>DATE SUBMITTED</b> 7/25/2018



## 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, which means it will conduct an analysis of impediments to fair housing choice within the jurisdiction, take appropriate actions to overcome the effects of any impediments identified through that analysis, and maintain records reflecting that analysis and actions in this regard.

**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, and implementing regulations at 49 CFR 24; and it has in effect and is following a residential antidisplacement and relocation assistance plan required under section 104(d) of the Housing and Community Development Act of 1974, as amended, in connection with any activity assisted with funding under the CDBG 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 CDBG, HOME, ESG, and HOPWA funds are consistent with the strategic plan.

~~Section 3 - It will comply with section 3 of the Housing and Urban Development Act of 1968, and implementing regulations at 24 CFR Part 135.~~

\_\_\_\_\_  
Signature/Authorized Official

7/17/18  
\_\_\_\_\_  
Date

Anthony J. Delgado, City Manager

Title

## Specific CDBG 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 housing and community development plan identifies community development and housing needs and specifies both short-term and long-term community development objectives that provide decent housing, expand economic opportunities primarily for persons of low and moderate income. (See CFR 24 570.2 and CFR 24 part 570)

**Following a Plan** -- It is following a current consolidated plan (or Comprehensive Housing Affordability Strategy) 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 certifies that 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 activities which the grantee certifies are designed to meet other community development needs having a 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);
2. Overall Benefit. The aggregate use of CDBG funds including section 108 guaranteed loans during program year(s) \_\_\_\_\_ , \_\_\_\_\_ (a period specified by the grantee consisting 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.

The jurisdiction will not attempt to recover any capital costs of public improvements assisted with CDBG funds, including Section 108, unless CDBG funds are used to pay the proportion of fee or assessment attributable to the capital costs of public improvements financed from other revenue sources. In this case, an assessment or charge may be made against the property with respect to the public improvements financed by a source other than CDBG funds. Also, 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 USC 2000d), the Fair Housing Act (42 USC 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.

  
\_\_\_\_\_  
Signature Authorized Official

7-17-18  
\_\_\_\_\_  
Date


Anthony J. Delgado, City Manager

Title

**OPTIONAL CERTIFICATION  
CDBG**

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 a 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 a 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.

	7-17-18
_____ Signature/Authorized Official	_____ Date

Anthony J. Delgado, City Manager  
\_\_\_\_\_  
Title

## Specific HOME Certifications

The HOME participating jurisdiction certifies that:

**Tenant Based Rental Assistance** -- If the participating jurisdiction intends to provide tenant-based rental assistance:

The use of HOME funds for tenant-based rental assistance is an essential element of the participating jurisdiction's consolidated plan for expanding the supply, affordability, and availability of decent, safe, sanitary, and affordable housing.

**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.

**Appropriate Financial Assistance** -- 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;

  
\_\_\_\_\_  
Signature/Authorized Official

7-17-18  
\_\_\_\_\_  
Date

Anthony J. Delgado, City Manager

Title

## ESG Certifications

The Emergency Solutions Grants Program Recipient certifies that:

**Major rehabilitation/conversion** – If an emergency shelter’s rehabilitation costs exceed 75 percent of the value of the building before rehabilitation, the jurisdiction 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 jurisdiction 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 jurisdiction 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 jurisdiction 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 jurisdiction 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 jurisdiction 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 such individuals.

**Matching Funds** – The jurisdiction will obtain matching amounts required under 24 CFR 576.201.

**Confidentiality** – The jurisdiction 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 jurisdiction 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 jurisdiction undertakes with assistance under ESG are consistent with the jurisdiction’s consolidated plan.

**Discharge Policy** – The jurisdiction will establish and implement, to the maximum extent practicable and where appropriate policies and protocols for the discharge of persons from

publicly funded institutions or systems of care (such as health care facilities, mental health facilities, foster care or other youth facilities, or correction programs and institutions) in order to prevent this discharge from immediately resulting in homelessness for these persons.

N/A

\_\_\_\_\_  
Signature/Authorized Official

\_\_\_\_\_  
Date

\_\_\_\_\_  
Title

## HOPWA 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 plan:

1. For at least 10 years in the case of assistance involving new construction, substantial rehabilitation, or acquisition of a facility,
2. For at least 3 years in the case of assistance involving non-substantial rehabilitation or repair of a building or structure.

N/A

\_\_\_\_\_  
Signature/Authorized Official

\_\_\_\_\_  
Date

\_\_\_\_\_  
Title



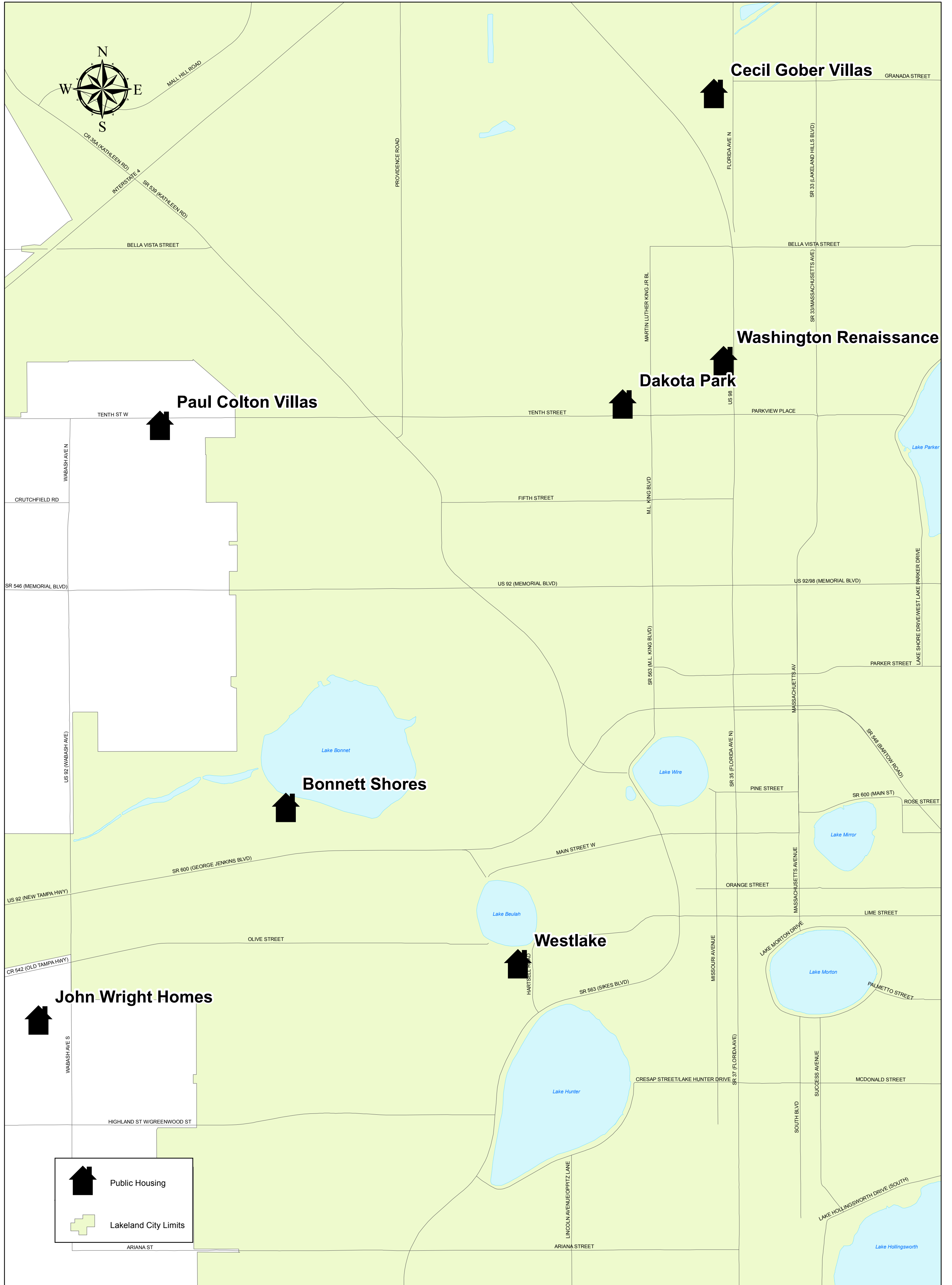
## APPENDIX TO CERTIFICATIONS

### INSTRUCTIONS CONCERNING LOBBYING:

#### A. 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.

# Public Housing Locations



# Public Service Sites

