

City of Palm Coast, Florida Agenda Item

Agenda Date : August 9, 2022

Department	COMMUNITY DEVELOPMENT	Amount
Division	PLANNING	Account #
Subject	RESOLUTION 2022-XX APPROVING THE 2022-2026 CONSOLIDATED ACTION PLAN FOR THE COMMUNITY DEVELOPMENT BLOCK GRANT (CDBG) PROGRAM	
Presenter : Jose Papa, AICP, Senior Planner		
Background:		
This is a legislative item that requires a public hearing.		
The Community Development Block Grant (CDBG) Program started in 1974 to provide funding for housing and community development. Activities or Programs funded by CDBG funds must meet one of the following the National Objectives of the Program:		
<div>1) Benefit low- and moderate-income persons (LMI)</div> <div>2) Prevent or eliminate slum or blight</div> <div>3) Address urgent community development needs (Emergency)</div>		
As an entitlement community, the City of Palm Coast will be eligible to receive an annual allocation from the Department of Housing and Urban Development (HUD). Historically, CDBG funds have been used for various community development activities such as:		
<div><div>• Housing Programs,</div><div>• Public Services (Limited to 15% of Grant),</div><div>• Public Infrastructure/Facilities (In Qualified Areas based on Census or benefits area 51% or greater LMI Area),</div><div>• Economic Development, and</div><div>• Planning/Administration/Monitoring of the Program (limited to 20% of allocation).</div></div>		
In the City of Palm Coast, CDBG funds have been used to fund the following activities:		
<div><div>• Housing rehabilitation of owner-occupied units,</div><div>• Public Services,</div><div>• Public Infrastructure (trails), and</div><div>• Planning/Administration/Monitoring of the program.</div></div>		

To receive CDBG funds, an entitlement community is required to complete a Consolidated Plan, Strategic Plan, and Annual Action Plan. The Consolidated Plan is designed to provide a unified vision for community development actions to meet CDBG goals of decent housing, suitable living environment, & expanded economic opportunities. The Strategic Plan is an outlay of expected actions and programs to address City needs as consistent with the national objectives and the Annual Action Plan describes the intended use of CDBG funds over the coming year.

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

The data provided in the CAP highlights the challenges for the community.

Population over the age of 65

Data shows the City will continue to have a significant population over the age of 65 (from 21% to 28% of total population between 2010 and 2020), the need for increased services for the population over the age of 65 (especially those on a fixed income) is significantly impacted by economic changes or sudden expenses such as home repair or health care. Other data in the CAP shows the following:

- 13% of all households in the City are single-family households over the age of 65,
- 49% of all households have one or more people over the age of 65,
- 57% of households in an owner-occupied unit with a cost burden of 30% or more includes a person over the age of 62, and
- there are over 700 households where the grandparents are responsible for their grandchildren.

Cost-burden (when housing costs, whether rent or mortgage with utilities, are over 30% of income)

The CAP data shows the following:

- 61% of all households earning 80% or less of the Area Median Income are cost-burdened (pay 30% or more for rent or mortgage payment)
- Of the 61%, 34% are in owner-occupied units and 27% are renters.

These statistics indicate that Low-Moderate Income households as a whole are subject to having a cost-burden. Similar to households on a fixed-income or a household reliant on a single income, cost-burdened households are vulnerable to homelessness should sudden emergency expenses occur (health care, significant home repair, etc.).

Age of Housing Stock

Over 50% of the City's housing stock was constructed after 2000. Although the City's housing stock and neighborhoods may be relatively young compared to other areas of the country, it is important to recognize the City's housing inventory is aging, and additional resources will be needed to maintain the housing stock to a livable condition and prevent the dilapidation of neighborhoods. These challenges are enhanced by having a more elderly population or cost-burdened household who may have limited flexible income for significant home repairs.

Social Service Needs

As stated through the CAP, a primary obstacle to meeting social service needs is the limited financial and staff resources available. The City recognizes that other governmental agencies (Flagler County) or non-governmental agencies such as Flagler Cares, or the Family Life Center provides vital services in the community to fill assist with various issues such as domestic violence, threat of homelessness, financial assistance for utilities, rent, etc. Through consultation and dialogue with providers, the City may be able to provide limited assistance through the use of limited CDBG funds for public service.

Based on the challenges and findings provided above, it is proposed that the FFY 2022-2026 Consolidated Plan continue with activities identified in the current Consolidated Plan and Action Plan, through the following goals:

Goal: Provide Decent Housing:

Encourage Home Ownership and Reinvestment by providing financial assistance programs for home repairs to retain the affordable housing stock or financial assistance to assist first-time homebuyers.

Goal: Create a Sustainable Living Environment:

Expand Availability and Access to public services through funding of public service activities
Invest in Capital Projects that improve the safety and livability of neighborhoods

Goal: Expanded Economic Opportunities

Identify economic activities which may be assisted by CDBG funds.

Goal: Address Urgent Needs

As a result of emergency, identify potential activities which may be implemented with CDBG funds.

The Citizen's Advisory Task Force (CATF) held a public hearing on June 22, 2022, and recommended approval. Additionally, the CATF made a recommendation to highlight the need for more teen activities in the city and to seek opportunities to assist organizations who provide teen activities. Staff also recommends approval of the plan.

Recommended Action:

ADOPT RESOLUTION 2022-XX APPROVING THE 2022-2026 CONSOLIDATED ACTION PLAN FOR THE COMMUNITY DEVELOPMENT BLOCK GRANT (CDBG) PROGRAM AND SEEK MORE TEEN ACTIVITIES AND OPPORTUNITIES TO ASSIST ORGANIZATIONS WHO PROVIDE TEEN ACTIVITIES

Community Development Block Grant (CDBG) Consolidated Action Plan

City Council
Public Workshop
August 9, 2022



Presentation Outline

History & Background

Required Planning and Procedures (Consolidated, Strategic, Action)

Findings

Goals & Proposed Activities

Next Steps

CDBG Program – History & Background

Federal Program that started in 1974, to provide funding for community development.

Program provides discretion to grantee on CDBG activities.

Activities **must meet one** of the National Objectives of the Program:

- 1) Benefit low- and moderate-income persons or Area, or
- 2) Prevent or eliminate slum or blight, or
- 3) Address urgent community development needs (Emergency).

CDBG Program – History & Background

CDBG Example Project/Programs

- Housing Related Activities (Homeownership and Rehabilitation)
- Public Services (Limited to 15% of Grant allocation)
- Economic Development
- Infrastructure Improvement (In qualified area or LMI census tracts)
- Planning/Administration/Monitoring for Program (limited to 20% of allocation)

CDBG Program – History & Background

CDBG funded activities in City (since program start in 2012):

- Infrastructure Project in LMI Area
- Financial Assistance to LMI Households for home-repair
- Financial Assistance to a First-Time Homebuyer
- Stipend to assist students from low-moderate income households to attend summer camp
- Mini-grant program

CDBG Program – History & Background

To receive funding, the following needs to be completed:

Consolidated Plan –

Document intended to provide a unified vision for community development actions to meet CDBG goals of decent housing, suitable living environment, & expanded economic opportunities

Strategic Plan –

Plan covering 3 or 5 year period that describes how jurisdiction intends to provide services that address CDBG goals

CDBG Program – History & Background

Annual Action Plan

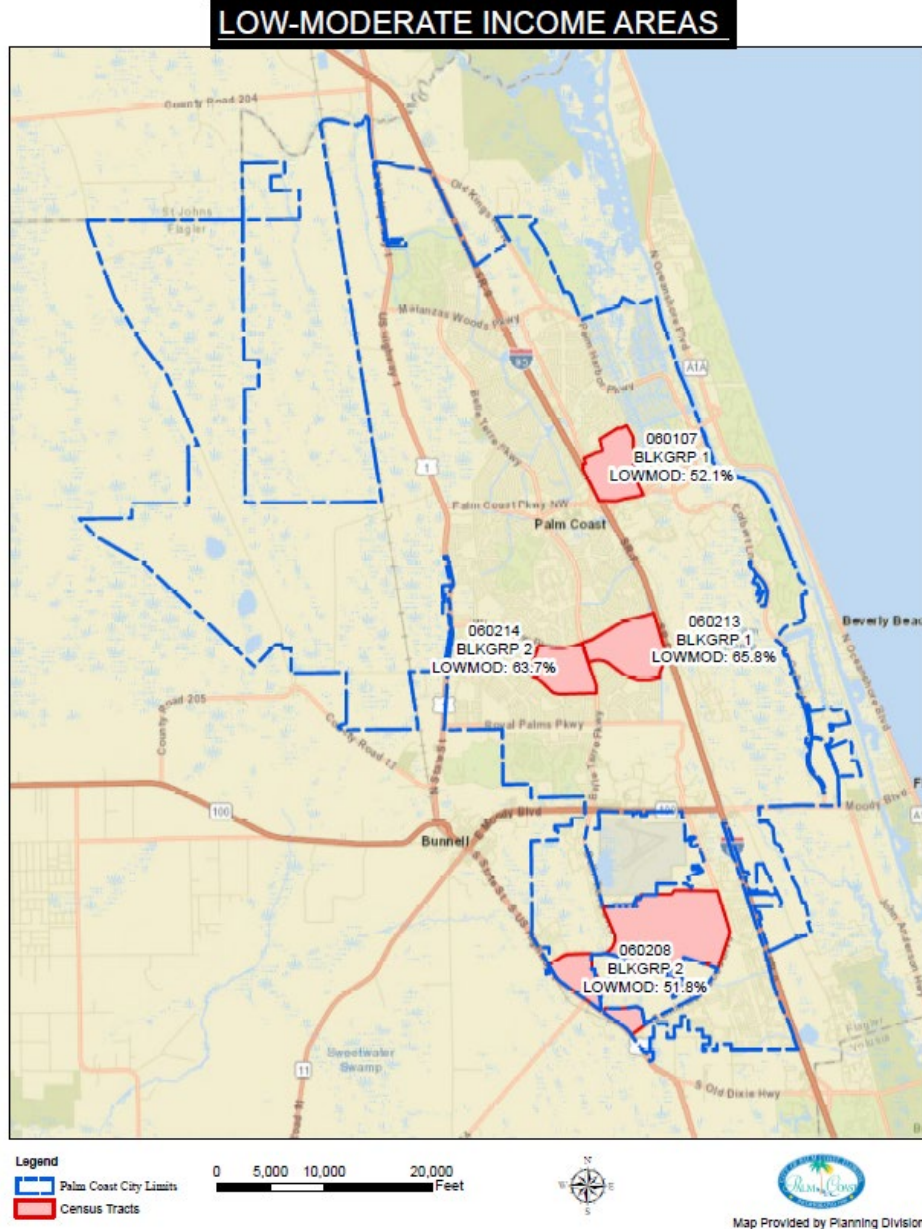
1 year plan describes actions to occur over the coming year.

Other documents:

Assessment of Fair Housing (AFH) – adopted in March 2022

Comprehensive Annual Performance and Evaluation Report (CAPER) – end of year report

Consolidated Action Plan



Updates Low-Moderate Income Census Tracts 5-Year American Community Survey.

Opportunities for needed infrastructure or public facilities improvements

Consolidated Action Plan – Findings - Highlights

- City continues to be an aging community
- Cost burden for LMI population
- Aging housing inventory
- Public service needs exist

Consolidated Action Plan – Findings - Highlights

City population continues to age:

- 13% of all households in the City are single-family households over the age of 65,
 - 49% of all households have one or more people over the age of 65,
 - 57% of households in an owner-occupied unit with a cost burden of 30% or more includes a person over the age of 62, and
 - there are over 700 households where the grandparents are responsible for grandchildren
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- Elderly households are vulnerable due to fixed income, single-income, disabilities that may require rehabilitation of home

Consolidated Action Plan – Findings - Highlights

Cost Burden (housing costs (rent or mortgage with utilities) are over 30% of income)

- 61% of all households earning 80% or less of the Area Median Income are cost-burdened (pay 30% or more for rent or mortgage payment)
- Of the 61%, 34% are in owner-occupied units and 27% are renters
- Cost-burdened households are vulnerable to financial distress or homelessness should sudden emergency expenses occur (health care, significant home repair, rent increase, etc.).

Consolidated Action Plan – Findings - Highlights

Age of Housing Stock

- Over 50% of the City's housing stock was constructed after 2000,
- It is important to recognize that as the City's housing inventory is aging, and that additional resources will be needed to maintain the housing stock to a livable condition and prevent the dilapidation of neighborhoods.
- Challenges are enhanced by having a more elderly population (50%) or cost-burdened household who may have limited flexible income for significant home repairs

Consolidated Action Plan – Findings - Highlights

Public service needs exist

- Limited financial and staff resource
- City provides service through existing City functions (recreation-summer camp programs)
- Governmental (Flagler County) and Non-governmental agencies (Flagler Cares, Family Life Center) provide social services
- Identify opportunities for use of limited CDBG funds to assist providers

Consolidated Action Plan

Based on findings in Consolidated Plan, Strategic Plan there is recognition of the following:

- 1) Available funds are limited and cannot address all the city needs,
- 2) There are on-going City programs and activities that are eligible for use of CDBG funds consistent with CDBG National Objectives,
- 3) There are social services and agencies serving the City,
- 4) Due to limited resources (staff and funding) – City may play a support role to service providers and when appropriate, make funds available to service organizations

Consolidated Action Plan – Goals

Continue with Existing Goals and Activities

Provide Decent Housing:

Encourage Home Ownership and Reinvestment by providing financial assistance programs for home repairs to retain the affordable housing stock or financial assistance to assist first-time homebuyers.

On-going Activities: Financial assistance for home repair, home ownership, or other housing activity

Consolidated Action Plan – Goals

Sustainable Living Environment:

Expand Availability and Access to public services

Invest in Capital Projects that improve the safety and livability of neighborhoods

On-going Activities: Summer camp/Recreational activities, public service assistance

Consolidated Action Plan - Goals

Expanded Economic Opportunities

Identify economic activities which may be assisted by CDBG funds.

Address Urgent Needs

As a result of emergency, identify potential activities which may be implemented with CDBG funds.

Action Plan FFY 2022 – Proposed Allocation

Activity	Proposed Allocation
Housing Program	\$387,660
Public Service (maximum 15% of allocation)	\$74,586
Planning, Administration, & Monitoring (maximum 20% of allocation)	\$35,000
TOTAL ALLOCATION FOR FFY 2022 (2022/23)	\$497,246

Consolidated Action Plan – Advisory Board Action

- CATF held a public hearing on June 22, 2022
- Recommend
 - Recommend Approval of CAP with additional emphasis on making funding available for teen activities

Consolidated Action Plan-Next Steps

- **City Council Public Workshop (Today)**
- City Council Public Hearing (Aug. 16)
- Submittal to HUD (Aug. 16)

Questions

RESOLUTION 2022-____
COMMUNITY DEVELOPMENT BLOCK GRANT (CDBG)
CONSOLIDATED ACTION PLAN FFY 2022-2026 AND
ANNUAL ACTION PLAN FFY 2022

**A RESOLUTION OF THE CITY COUNCIL OF THE CITY OF
PALM COAST, FLORIDA, ADOPTING THE FFY 2022-2026
COMMUNITY DEVELOPMENT BLOCK GRANT (CDBG)
PROGRAM CONSOLIDATED ACTION PLAN AND THE FFY 2022
ANNUAL ACTION PLAN; AUTHORIZING THE CITY MANAGER
OR DESIGNEE TO EXECUTE NECESSARY DOCUMENTS;
PROVIDING FOR SEVERABILITY, CONFLICTS,
IMPLEMENTING ACTIONS, AND AN EFFECTIVE DATE**

WHEREAS, the City of Palm Coast (the “City”) is an entitlement jurisdiction in the Federal Department of Housing and Urban Development (HUD) Community Development Block Grant (CDBG) Program; and

WHEREAS, the City Council has adopted a Citizen Participation Plan establishing the policies and procedures to be followed to encourage participation by residents and affected parties in the development of the City’s CDBG programs; and

WHEREAS, the City implemented the policies and procedures of the Citizen Participation Plan to ensure appropriate and adequate citizen participation; and

WHEREAS, the City has completed a five-year consolidated plan (Consolidated Action Plan), which is a required comprehensive planning document in order to receive funding under the Federal CDBG program; and

WHEREAS, the City’s 2022-2026 Consolidated Action Plan, contains a housing and community development needs assessment; a survey of available resources; and a five-year strategy that specifies achievable housing and community development goals and programs; and

WHEREAS, the City has prepared a one-year action plan (Annual Action Plan) to implement the first year of the five-year strategy of the 2022-2026 Consolidated Action Plan; and

WHEREAS, the 2022-2023 Annual Action Plan (FFY 2022) establishes a one-year program in compliance with HUD funding allocations and requirements; and

WHEREAS, the City has given notice of the required public hearing(s) for consideration of approval of the 2022-2026 Consolidated Action Plan, and the 2022-2023 Annual Action Plan; and

WHEREAS, the Citizens Advisory Task Force (CATF) held a public hearing on June 22, 2022, to hear public testimony of all interested parties regarding the 2022-2026 Consolidated Action Plan, and the 2022-2023 Annual Action Plan; and

WHEREAS, the CATF has reviewed and made recommendations to the City Council on the 2022-2026 Consolidated Action Plan, and the 2022-2023 Annual Action Plan; and

WHEREAS, a 30-day comment period on the Consolidated Action Plan and the Annual Action Plan was held from July 1, 2022 to August 1, 2022; and

WHEREAS, the City Council held public hearing on August 16, 2022 to hear public testimony of all interested parties regarding the 2022-2026 Consolidated Action Plan, and the 2022-2023 Annual Action Plan.

NOW, THEREFORE, BE IT RESOLVED BY THE CITY COUNCIL OF THE CITY OF PALM COAST, FLORIDA, AS FOLLOWS:

SECTION 1. APPROVAL OF CONSOLIDATED ACTION PLAN AND ANNUAL ACTION PLAN. The City Council of the City of Palm Coast hereby approves the 2022-2026 Consolidated Action Plan, and the 2022-2023 Annual Action Plan, as attached hereto and incorporated herein by reference as Exhibit “A.”

SECTION 2. AUTHORIZATION TO EXECUTE. The City Manager, or designee, is hereby authorized to execute the necessary documents.

SECTION 3. SEVERABILITY. If any section or portion of a section of this Resolution proves to be invalid, unlawful, or unconstitutional, it shall not be held to invalidate or impair the validity, force, or effect of any other section or part of this Resolution.

SECTION 4. CONFLICTS. All resolutions or parts of resolutions in conflict with any of the provisions of this Resolution are hereby repealed.

SECTION 5. IMPLEMENTING ACTIONS. The City Manager is hereby authorized to take any actions necessary to implement the action taken in this Resolution.

SECTION 6. EFFECTIVE DATE. This Resolution shall take effect immediately upon adoption by the City Council.

DULY ADOPTED by the City Council of the City of Palm Coast, Florida, on the 16th day of August 2022.

ATTEST:

CITY OF PALM COAST

VIRGINIA A. SMITH, CITY CLERK

DAVID ALFIN, MAYOR

APPROVED AS TO FORM AND LEGALITY:

NEYSA BORKERT, CITY ATTORNEY

Attachments:

Exhibit "A" – 2022-2026 Community Development Block Grant Consolidated Action Plan and the 2022-2023 Annual Action Plan



Community Development Block Grant (CDBG)

Consolidated Action Plan FFY 2022-2026

(including Annual Action Plan for FFY 2022)

Submitted To:

US Department of Housing and Urban Development (HUD)

Executive Summary

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

1. Introduction

The Consolidated Action Plan (CAP) is a five year road map for local jurisdictions that receive federal funds for housing and community development activities through the Community Development Block Grant (CDBG) Program. The plan addresses housing, homelessness, community and economic development needs, and develops a strategic plan for these needs. The Consolidated Plan articulates the vision for the City of Palm Coast and a strategy to address the vision. This 5-year Consolidated Action Plan (CAP) will serve the City for the 5-year period from October 1, 2022 to September 30, 2027.

The Consolidated Plan was developed using demographic data provided by HUD through the Comprehensive Housing Affordability Strategy (CHAS)* data, information from private and public agencies, and citizen participation. As a CDBG entitlement community, the City is required to submit a CAP every five years. Additionally, as part of the constant monitoring and evaluation required under the CDBG program, an annual action plan, certifications, and performance reports are submitted annually. The activities included in this CAP is intended to continue the City's actions to address community development and housing needs for eligible individuals and neighborhoods in the City.

**The primary purpose of the CHAS data is to demonstrate the number of households in need of housing assistance. This is estimated by the number of households that have certain housing problems and have income low enough to qualify for HUD's programs (primarily 30, 50, and 80 percent of median income). It is also important to consider the prevalence of housing problems among different types of households, such as the elderly, disabled, minorities, and different household types. The CHAS data provide counts of the numbers of households that fit these HUD-specified characteristics in HUD-specified geographic areas.*

As stated in various areas of this CAP, the City recognizes its limitations to provide social service needs due to limited resources (staff and funds). Where social service needs are expected, agencies such as non-profits (Flagler Cares, Family Life Center) or county government have available staff and resources to provide assistance. The City recognizes and as appropriate and feasible supports these agencies in providing assistance to their clients.

Historically, the City's CDBG funds have been used for a variety of projects such as:

- A sidewalk project to improve neighborhood livability and sustainability,
- Single-family home rehabilitation program to preserve the available housing stock serving the low-moderate income families in the City,
- Financial assistance for students from low-moderate income families to attend the City's summer camp program, and

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- On-going planning, administration, and monitoring of the CDBG program.

In FFY 2021, the City initiated a first-time homebuyer program to provide financial assistance for down payment or closing costs.

To meet the statutory program goals of decent housing, a suitable living environment, and expanded economic opportunities to benefit low-moderate income persons and households, the City will continue to rely on the objectives, policies, and actions identified in various City documents such as the City's Capital Improvements Plan (CIP), 2035 Comprehensive Plan, the Recreation and Parks Facilities Master Plan, and the Pedestrian and Bicycle Facilities Master Plan. Additionally, the City consults with various social service agencies including Flagler County Health and Human Services Department, the Volusia/Flagler Continuum of Care, Flagler Cares, Family Life Center, and the Flagler County Free Clinic on public service needs as well as data for analysis.

2. Summary of the objectives and outcomes identified in the Plan Needs Assessment Overview

Overview

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

Goal 1: Provide Decent Housing:

- **Encourage Home Ownership and Reinvestment** by providing financial assistance programs for home repairs to retain housing stock serving low-moderate income families. In addition to rehabilitation program, the City will offer a first-time homebuyer program. City will also identify opportunities to expand housing activities without duplicating services provided by other entities.

Goal 2: Sustainable Living Environment:

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

Goal 3: For Expanded Economic Opportunities:

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

3. Evaluation of past performance

The City has received approximately \$2.5 million in CDBG entitlement funds between PY 2017-2021 (the time frame of the previous Consolidated Action Plan). These funds were used to assist 62 families through

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the housing rehabilitation program, 250 students to attend the City's summer camp, and to complete the last 1.8 miles of sidewalk in the Seminole Woods neighborhood.

4. Summary of citizen participation process and consultation process

To complete the CAP, the City consulted with various local and regional social service and housing advocate agencies. The CAP also includes findings from the Assessment of Fair Housing (AFH) which included a survey of residents and social service providers. Additionally, the City continuously coordinates with the adjacent municipalities as well as regional planning agencies such as the Northeast Florida Regional Council, and the River to Sea Transportation Planning Organization.

This Section To Be Completed After All Public Hearings and 30-day Comment Period.

5. Summary of public comments

This Section To Be Completed After All Public Hearings and 30-day Comment Period.

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

This Section To Be Completed After All Public Hearings and 30-day Comment Period.

7. Summary

This Consolidated Action Plan consists of four parts as provided in the template provided by the HUD through the IDIS system. These parts include:

- housing and community development needs assessment,
- a market analysis,
- a Strategic Plan, and
- the Annual Action Plan.

The Strategic Plan is a key component of the Consolidated Plan, as this section outlines the City of Palm Coast's objectives and outcomes to address the needs identified in the assessment section. The Annual Action Plan, describes how federal resources will be allocated. Every year during the time period covered by this CAP, the City will complete an Annual Plan to communicate how the CDBG funds will be allocated.

The Process

PR-05 Lead & Responsible Agencies 24 CFR 91.200(b)

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

The following are the agencies/entities 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	City of Palm Coast	Community Development Department

Table 1 – Responsible Agencies

Narrative

The City of Palm Coast Community Development Department is the responsible entity for administering the CDBG program. Staff works with other City departments (Finance, Central Services), non-profit organizations, & Flagler County to carry out the goals of the CAP. Additionally, the City will retain the services of a vendor/consultant to assist with activity monitoring and administration.

Consolidated Plan Public Contact Information

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PR-10 Consultation – 91.100, 91.110, 91.200(b), 91.300(b), 91.215(I) and 91.315(I)

1. Introduction

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

During the course of the administration and implementation of CDBG funded activities, the City continuously coordinates with these various agencies. The City reached out to social service and housing assistance service providers (including the Public Housing Authority) as part of the recently completed Assessment of Fair Housing (AFH). Additionally, during the completion of this CAP, staff conducted one on one interviews with the major providers of social service in the Flagler County area including: Flagler County Social Service, Family Life Center, the Flagler County Housing Authority, Flagler County Free Clinic, Flagler Cares, and the Volusia-Flagler County Coalition for the Homeless.

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

The City works consistently with the Flagler County SHIP program, the City and County have an Interlocal Agreement that allows for the coordination of services and information between the two entities. This coordination assists to minimize the duplication of services. Additionally, the City annually works with Mid-Florida Housing Partnership, the local Board of Realtors, local financial institutions, and the County to host the Annual Flagler County Housing Fair (this event has been suspended the past two years due to COVID-19). This annual housing fair targets all families and provides information on available housing assistance programs in the County as well as information on opportunities for home-ownership.

As part of the completion of the Consolidated Action Plan (CAP) or the Annual Action Plan (AAP), mental health, and service agencies are invited to attend the public workshops as well as to provide comments on the drafts of the CAP or AAP. Additionally, the City continuously receives feedback and comment on activities which may be funded through the CDBG program. This feedback typically comes from social service non-profits seeking the availability of CDBG funds for social service activities.

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 of Palm Coast coordinated with the Volusia/Flagler County Coalition for the Homeless (VFCCH), the Continuum of Care (CoC) responsible for coordinating social service providers, homelessness outreach, and other services targeted to the population experiencing homelessness in the Flagler/Volusia

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County region. In 2019, the Volusia-Flagler County Continuum of Care (FL-504) changed its name to the Commission on Homelessness and Housing for Volusia and Flagler Counties (COHH).

The COHH is responsible for conducting the annual count of people experiencing homelessness, identifying the gaps in available housing and services to homeless subpopulations, and strategically planning and organizing the expansion of housing and supportive services to meet the needs.

In 2017, the COHH completed its Strategic Plan for addressing homelessness. The plan was updated on July 2021. The Strategic Plan is built on a foundation of data and input from members of the community and expertise of people on all sides of the issue. It is intended to be overarching, implementable and leads us to the goal of effectively ending homelessness of all types, which is, in reality, fully within our grasp.

The COHH Five-Year Strategic Plan includes the integration of “Opening Doors”, HUD’s Federal Plan to Prevent and End Homelessness, and five separate but interactive strategies identified through Community input into a single plan to reflect our communities and their needs.

1. Enhance Coordinated Entry System
2. Assure the provision of homeless prevention, early intervention services and human services
3. Increase services, retool existing services and enhance the provision of housing services
4. Assure Access to Health Services
5. Assist clients to achieve economic stability

As stated through this document, the City recognizes its limitations to implement social service programs due to limited staffing and financial resources. The City seeks to coordinate and to provide support as appropriate to implement actions to address homeless needs and to prevent homelessness.

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

The City of Palm Coast does not receive ESG funds. The City of Palm Coast receives a limited amount of funding through the CDBG program. The City of Palm Coast recognizes the Commission on Homelessness and Housing for Volusia and Flagler Counties (COHH), as the lead agency in determining how to allocate ESG funds and will provide support and coordinate efforts as necessary.

2. Describe Agencies, groups, organizations and others who participated in the process and describe the jurisdictions consultations with housing, social service agencies and other entities

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Table 2 – Agencies, groups, organizations who participated

1	Agency/Group/Organization	City of Palm Coast
	Agency/Group/Organization Type	Other government - Local
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Economic Development
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	City of Palm Coast serves the as the lead agency for the planning and administration of the CDBG program. The Community Development Department serves as the lead but consults with other departments such as Recreation and Parks, Utilities, & Construction Management & Engineering Services to identify projects and needs that may be funded with CDBG funds.
2	Agency/Group/Organization	FL-504 Volusia/Flagler County Coalition for the Homeless
	Agency/Group/Organization Type	Services-homeless
	What section of the Plan was addressed by Consultation?	Homelessness Strategy Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	The Coalition is the lead agency for the Continuum of Care which covers Flagler County (in addition to Volusia County).Data and documents from the VFCCCH were used in the completion of the Consolidated Action Plan.
3	Agency/Group/Organization	Northeast Florida Regional Council
	Agency/Group/Organization Type	Regional organization
	What section of the Plan was addressed by Consultation?	Economic Development
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	NEFRC completed the Comprehensive Economic Development Strategy (CEDS) for the 7 county region in Northeast Florida including Flagler County. This study is cited in the report.
4	Agency/Group/Organization	Flagler County Human Services
	Agency/Group/Organization Type	Other government - County

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	What section of the Plan was addressed by Consultation?	Housing Need Assessment
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	The City coordinated with the Health and Human Services Department of Flagler County on housing needs in the Flagler County/Palm Coast area. The County and City currently have an Interlocal Agreement to coordinate on the administration of the State Housing Initiatives Partnership (SHIP) program. This coordination allows for opportunities to discuss areas where the CDBG and SHIP program may enhance each other.
5	Agency/Group/Organization	Flagler Cares
	Agency/Group/Organization Type	Services-homeless Services-Health Services-Education
	What section of the Plan was addressed by Consultation?	Homelessness Strategy Non-Homeless Special Needs
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Flagler Cares is a partner with the Volusia-Flagler Coalition for the Homeless in providing a response to the homeless in Flagler County. Flagler Cares provides services to assist populations who are at risk of becoming homeless. Data and documents from Flagler Cares such as the Community Health Needs Assessment were used in the completion of the Consolidated Action Plan.
6	Agency/Group/Organization	Family Life Center
	Agency/Group/Organization Type	Services-Victims of Domestic Violence
	What section of the Plan was addressed by Consultation?	Non-Homeless Special Needs Victims of Domestic Violence
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	The City coordinated with Family Life Center through direct conversation about the needs of their clients. Outcomes of this conversation will present a form to identify potential activities that may be funded through the use of CDBG funds.
7	Agency/Group/Organization	Flagler County Free Clinic
	Agency/Group/Organization Type	Services-Health

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	What section of the Plan was addressed by Consultation?	Non-Homeless Special Needs
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	The City coordinated with Flagler County Free Clinic through direct conversation about the needs of their clients. The outcome of this conversation will present a forum to identify potential activities that may be funded with CDBG funds. The Free Clinic continues to struggle with the opportunity to provide dental care for potential clients.
8	Agency/Group/Organization	MID FLORIDA HOUSING PARTNERSHIP
	Agency/Group/Organization Type	Services - Housing
	What section of the Plan was addressed by Consultation?	Housing Need Assessment
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	The City is a partner with Mid-Florida in providing an annual Housing Fair. The Fair provides information on housing opportunities and housing programs available in Flagler County.

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

The City coordinated with a wide range of agencies in the completion of this CAP. Comments and consultation from all agencies were welcomed and considered during the process.

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

Name of Plan	Lead Organization	How do the goals of your Strategic Plan overlap with the goals of each plan?
Continuum of Care	Commission on Homelessness and Housing for Volusia/Flagler	The Commission completed a Gap Needs and Assessment Report on Homelessness. The report provides details on responding agencies for different homelessness needs. The gaps identified in the study helps to identify activities which may be funded through the CDBG program.

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Name of Plan	Lead Organization	How do the goals of your Strategic Plan overlap with the goals of each plan?
5-Year Strategic Plan	Commission on Homelessness and Housing for Volusia/Flagler	The report provides strategic goals and objectives to improve the response to homeless needs. The gaps identified in the study helps to identify activities which may be funded through the CDBG program.
Community Health Needs Assessment	Flagler Cares	Flagler Cares coordinated the completion of the Flagler and Volusia County Community Health Needs Assessment. This report identifies the health challenges facing the region and will assist to identify actions to address those challenges.
5-year Capital Improvements Plan	City of Palm Coast	The City's CIP includes capital improvements and projects which could potentially be funded through the CDBG program.

Table 3 – Other local / regional / federal planning efforts

Describe cooperation and coordination with other public entities, including the State and any adjacent units of general local government, in the implementation of the Consolidated Plan (91.215(I))

The City of Palm Coast coordinates with a number of public entities in the implementation of the Consolidated Plan. For housing activities, the City will coordinate with Flagler County (as the SHIP program coordinator and social service provider) on intake and strategies to avoid duplication of services. In addition to housing activities, the City provides notice of upcoming infrastructure projects, if the project is adjacent to a neighboring local government. Additionally, public service activities funded through the CDBG program (such as City's summer camp and recreational programs) are advertised in the local print media, social media, as well as the City's website. The advertisement of such announcements include notice that financial assistance is available.

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

PR-15 Citizen Participation – 91.105, 91.115, 91.200(c) and 91.300(c)

**1. Summary of citizen participation process/Efforts made to broaden citizen participation
Summarize citizen participation process and how it impacted goal-setting**

The completion of the Consolidated Action Plan (CAP) included the integration of the findings from the Assessment of Fair Housing (AFH) process. The AFH included a citizen survey that involved gauging the public's perception of concentrated areas of poverty or segregation in the City. Although the response to the survey was limited it was an attempt to open the floor for discussion of such issues and was not intended to be a statistically valid survey.

Additionally, the CAP used findings from the Community Health Need Assessment (CHNA) as coordinated and completed under the guidance of Flagler Cares. This study involved focus groups and interviews with partner organization staff, other community service providers, community members, and others. An online and phone survey with approximately 2,000 community members. The survey instrument included topic areas that emerged from the secondary data analysis, literature reviews of existing documents, initial qualitative research, and other early-stage research activities. Results were analyzed, and data tables/graphs were created to illuminate the results found in the report.

Citizen Participation Outreach TO BE COMPLETED AFTER PUBLIC HEARING

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)

Table 4 – Citizen Participation Outreach

Needs Assessment

NA-05 Overview

Needs Assessment Overview

The Needs Assessment identifies the needs in the City in the areas of affordable housing, community development, homelessness, and non-homeless special needs. The Needs Assessment is the basis for the Strategic Plan and will assist the City in targeting limited housing and community development resources. The needs are determined by analyzing quantitative data as well as qualitative data gathered through the citizen participation and consultation process.

The Needs Assessment is divided into the following sections:

Housing Needs Assessment – The analysis of American Community Survey (ACS) and Comprehensive Housing Affordability Strategy (CHAS) data as well as data and information from local sources shows that there is a significant need for affordable housing in the City of Palm Coast. Anecdotally and based on data, a common housing problem is cost burden (defined as a household spending more than 30% of income on housing costs).

Based on the 2013-2017 Comprehensive Housing Affordability Strategy (CHAS) data provided by HUD,

- Of the 3,770 renter households earning less than 80% of AMI, **78.5%** or 2,960 households pay more than 30% of their income for rent.
- Of the 7,080 owner households earning less than 80% of the AMI, **52.4%** or 3,715 households pay more than 30% of their income towards a mortgage.

Public Housing – The Flagler County Housing Authority provides housing opportunities for low income persons. As of May 2022, the agency manages 126 public housing units (within the City of Bunnell) and 257 housing choice vouchers (HCV). In consultation with the Housing Authority, the housing needs of residents of public housing are similar to the needs of the population at large. There is a need for additional affordable and available rental housing as experienced by the challenges experienced by clients of the Housing Authority. The majority of public housing residents and voucher holders are extremely low-income (0-30% AMI) and even with lower rent payments than private housing, public housing residents still experience cost burden.

Homeless Needs Assessment – In FY 2021 there were 694 persons experiencing homelessness in the Volusia/Flagler Region, 37 of the homeless persons were counted in Flagler County. Of the 37 homeless persons counted in Flagler County, 11 were sheltered while 26 were unsheltered.

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Non-Homeless Special Needs Assessment – The City identified the non-homeless special needs population that require supportive services as the elderly, frail elderly, persons with disabilities, persons with alcohol or other drug addiction, victims of domestic violence, and persons living with HIV/AIDS and their families. In consultation with the social service providers listed in this study. Affordable housing is a high need for these populations as well as support services.

Non-Housing Community Development Needs – Based on information gathered through review of the City budget as well as a review of the growth trends in Palm Coast/Flagler County, the City's non-housing community development needs include: Public Facilities (parks and recreational facilities, utility expansion, and roadway expansion); and Public Improvements, specifically street improvements. Public Services (general support services for various populations, mental health and suicide prevention, employment training, and homelessness needs) continues to be an area of concern.

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NA-10 Housing Needs Assessment - 24 CFR 91.205 (a,b,c)

Summary of Housing Needs

Demographics	Base Year: 2009	Most Recent Year: 2017	% Change
Population	69,000	82,360	19%
Households	29,016	29,740	2%
Median Income	\$48,672.00	\$51,208.00	5%

Table 5 - Housing Needs Assessment Demographics

Data Source: 2000 Census (Base Year), 2013-2017 ACS (Most Recent Year)

Number of Households Table

	0-30% HAMFI	>30-50% HAMFI	>50-80% HAMFI	>80-100% HAMFI	>100% HAMFI
Total Households	2,170	3,135	5,555	3,405	15,480
Small Family Households	775	860	1,620	1,210	6,475
Large Family Households	195	205	355	200	660
Household contains at least one person 62-74 years of age	580	805	2,050	1,260	5,765
Household contains at least one person age 75 or older	370	1,040	1,145	690	2,280
Households with one or more children 6 years old or younger	314	375	695	475	1,015

Table 6 - Total Households Table

Data Source: 2013-2017 CHAS

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Housing Needs Summary Tables

1. Housing Problems (Households with one of the listed needs)

	Renter					Owner				
	0-30% AMI	>30- 50% AMI	>50- 80% AMI	>80- 100% AMI	Total	0-30% AMI	>30- 50% AMI	>50- 80% AMI	>80- 100% AMI	Total
NUMBER OF HOUSEHOLDS										
Substandard Housing - Lacking complete plumbing or kitchen facilities	30	95	100	25	250	0	10	0	0	10
Severely Overcrowded - With >1.51 people per room (and complete kitchen and plumbing)	0	0	10	0	10	0	0	0	0	0
Overcrowded - With 1.01-1.5 people per room (and none of the above problems)	20	4	10	15	49	15	95	25	35	170
Housing cost burden greater than 50% of income (and none of the above problems)	510	675	405	10	1,600	930	565	410	130	2,035

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	Renter					Owner				
	0-30% AMI	>30- 50% AMI	>50- 80% AMI	>80- 100% AMI	Total	0-30% AMI	>30- 50% AMI	>50- 80% AMI	>80- 100% AMI	Total
Housing cost burden greater than 30% of income (and none of the above problems)	0	130	985	315	1,430	135	535	1,100	755	2,525
Zero/negative Income (and none of the above problems)	130	0	0	0	130	235	0	0	0	235

Table 7 – Housing Problems Table

Data 2013-2017 CHAS
Source:

2. Housing Problems 2 (Households with one or more Severe Housing Problems: Lacks kitchen or complete plumbing, severe overcrowding, severe cost burden)

	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
NUMBER OF HOUSEHOLDS										
Having 1 or more of four housing problems	555	775	520	45	1,895	945	670	435	165	2,215
Having none of four housing problems	30	275	1,485	730	2,520	275	1,405	3,115	2,465	7,260
Household has negative income, but none of the other housing problems	130	0	0	0	130	235	0	0	0	235

Table 8 – Housing Problems 2

Data 2013-2017 CHAS
Source:

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3. Cost Burden > 30%

	Renter				Owner			
	0-30% AMI	>30-50% AMI	>50-80% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	Total
NUMBER OF HOUSEHOLDS								
Small Related	270	400	650	1,320	280	315	430	1,025
Large Related	35	10	180	225	95	40	40	175
Elderly	70	320	365	755	605	665	870	2,140
Other	165	175	320	660	95	95	185	375
Total need by income	540	905	1,515	2,960	1,075	1,115	1,525	3,715

Table 9 – Cost Burden > 30%

Data 2013-2017 CHAS
Source:

4. Cost Burden > 50%

	Renter				Owner			
	0-30% AMI	>30-50% AMI	>50-80% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	Total
NUMBER OF HOUSEHOLDS								
Small Related	270	275	145	690	270	165	90	525
Large Related	35	10	0	45	95	10	0	105
Elderly	70	310	90	470	485	355	265	1,105
Other	165	175	175	515	95	40	55	190
Total need by income	540	770	410	1,720	945	570	410	1,925

Table 10 – Cost Burden > 50%

Data 2013-2017 CHAS
Source:

5. Crowding (More than one person per room)

	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
NUMBER OF HOUSEHOLDS										
Single family households	20	4	20	15	59	15	70	25	35	145

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	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
Multiple, unrelated family households	0	0	0	0	0	0	25	0	0	25
Other, non-family households	0	0	0	0	0	0	0	0	0	0
Total need by income	20	4	20	15	59	15	95	25	35	170

Table 11 – Crowding Information – 1/2

Data 2013-2017 CHAS
Source:

	Renter				Owner			
	0-30% AMI	>30-50% AMI	>50-80% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	Total
Households with Children Present	0	0	0	0	0	0	0	0

Table 12 – Crowding Information – 2/2

Data Source
Comments:

Describe the number and type of single person households in need of housing assistance.

The 2020 ACS 5-Year estimates indicates that 20.7% of all City of Palm Coast households are single-person households with 13.1% of all households being over the age of 65. A closer look at the single person households will show that 22% are renters and 78% are in owner occupied units. It is important to note that for the owner occupied units, 70% are over the age of 65, while 36% of single person households in rentals are over the age of 65.

Conclusions that can be drawn as to the housing assistance need for a single-person household come from the historic experience of such households. Typically, a single-person household is expected to be more vulnerable to sudden changes in housing costs (increase in rent or insurance) or a sudden need for major repair (e.g. roof or HVAC). This is due to the household's reliance on a single source of income, which may come as a result of a change in employment status (such as loss of job or reduction in work hours) or due to relying on a fixed income (as may be the case with households over the age of 65 or those who rely on disability benefits to supplement their income).

Additionally, households with persons 65 and over, may be expected to be on a fixed income, which adds to the vulnerability of this household type to sudden changes in housing costs (increase in rent or major repair).

Estimate the number and type of families in need of housing assistance who are disabled or victims of domestic violence, dating violence, sexual assault and stalking.

Disabled Families in Need of Housing Assistance

Disability status is self-reported to the U.S. Census Bureau and the types of disability include hearing or vision impairment, ambulatory limitation, cognitive limitation, and self-care or independent living limitation. According to the 2020 ACS 5-Year estimates, 11,665 (16%) of the City of Palm Coast's population over 18 reports having a disability. Data also reports that of the population over the age of 18 with a disability, 11% are below poverty level.

The Shimberg Center for Housing Studies reported in a 2020 rent comparison that recipients of Social Security Disability Income in Flagler County have a maximum affordable rent of \$235 (30% of monthly benefit of \$783) and that 113% income is needed for a 1-bedroom unit at fair market rent (\$881). According to the U.S. Social Security Administration, Office of Retirement and Disability Policy, Flagler County had 1,071 individuals who were receiving Social Security Disability income and in need of housing assistance.

The findings of the Shimberg Center report again highlights the vulnerability of the population who have disabilities to become potentially homeless. Identifying affordable units on a fixed income or income level is a challenge faced by populations of different income levels, but becomes more acute for someone with a disability or is on a fixed income.

Victims of Domestic Violence in Need of Housing Assistance

The following statistics are from the Florida Department of Law Enforcement (FDLE), Crime in Florida Abstract for Flagler County, 2019 (latest data available).

In 2019, there were 659 reported offenses categorized as "Domestic Violence", of these offenses, the large majority of these cases (522) were listed as "Simple Assault". The balance of the offenses are listed as "Aggravated Assault", "Rape", "Fondling", and "Threat/Intimidation". Each of these offenses provides a likelihood of the need to provide housing assistance in order to remove victims away from abusive situations or other support services to move a survivor away from their situation. This conclusion is primarily supported by data from the Florida Coalition Against Domestic Violence 2019 Annual Report that callers to the Florida Domestic Violence Hotline primarily requested assistance related to receiving shelter, support services, information regarding the civil and criminal justice system, and economic empowerment services that help survivors gain financial independence. Survivors also requested legal information related to divorce and child custody issues, parenting rights, and interstate jurisdiction.

There is currently one certified Domestic Violence Center in Flagler County, Family Life Center.

What are the most common housing problems?

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From the completion of the Assessment of Fair Housing, a random sample of residents provided their opinion regarding the residential opportunities in Palm Coast. Though the results may not necessarily provide indication of a “housing problem”, nevertheless, the opinions provided indicate the potential needs of the community from a very limited sample of its residents.

- Of the 79 responses to the question of adequate residential opportunities to meet the needs of lower-income residents. 47% of respondents thought there was a need for more opportunities, while the remainder opined that there is adequate or the right amount of residential opportunities.
- Of the 79 responses to the question of residential availability for seniors and those with disabilities, 40% of respondents thought there was a need for more opportunities, while the remainder opined that there is adequate or the right amount of residential opportunities.

In addition to reviewing the findings of the AFH as an indicator of “housing problems”. It is also necessary to review the available data from reliable resources to assist in the identification of “housing problems” within Palm Coast.

The 2016-2020 American Community Survey (ACS) shows that nearly 90% of all dwelling units in the City of Palm Coast are single-family detached residential units. If single-family attached units (duplexes or townhouses) were added, then nearly 94% of the housing stock in the City will be single-family units. There is no scientific or objective indicator to determine the appropriate balance of single-family versus multi-family units within a community. However, other statistical or anecdotal indicators may be used to determine what is the “right” or “appropriate” balance.

One indicator is the amount of rent paid for a household. Thirty percent (30%) of income is the common threshold used as an indicator of affordability for housing. Keeping housing costs below 30 percent of income is intended to ensure that households have enough money to pay for other nondiscretionary costs; therefore, policymakers consider households who spend more than 30 percent of income on housing costs to be housing cost burdened. From the 2016-2020 ACS, over 53.7% of renters paid greater than 30% of income toward rent, while 31.6% of homeowners had mortgage payments greater than 30% of household income.

In addition to data provided through the ACS, anecdotal information from a number of realtors, indicates that the limited number of multi-family dwelling units drives the rental rates up and makes it difficult to find affordable rental units. This limited supply of units drives households to rent other housing types (single-family units) which may not necessarily fit their current household needs.

Other anecdotal information comes from the City’s Community Development Department which indicates that with an aging population, there is a desire from more elderly households to relocate to a smaller unit with less maintenance or a more appropriate amount of living space for their current household needs.

Are any populations/household types more affected than others by these problems?

The results of the Assessment of Fair Housing (AFH) indicate that households that identified as “Other/Non-Hispanic” or “Black/Non-Hispanic” have disproportionate housing needs based on HUD’s indicator of a population subset experiencing a housing problem that is greater than 10% for the overall population.

The four housing problems are: incomplete kitchen facilities, incomplete plumbing facilities, more than 1 person per room, and cost burden greater than 30%. The data which is provided by HUD through the Comprehensive Housing Affordability Strategy (CHAS) shows that 48.20% “Other/Non-Hispanic” and 46.66% of “Black/Non-Hispanic” households experience one or more of the indicated housing problems, compared to 33.54% of the overall household total.

Reviewing the summary tables provided above (Table 7 to Table 11), low-moderate income households (households with an income less than 80% of Area Median Income (AMI) experience greater cost burden than the general household population.

Of the 3,770 renter households earning less than 80% of AMI, **78.5%** or 2,960 households pay more than 30% of their income for rent.

Of the 7,080 owner households earning less than 80% of the AMI, **52.4%** or 3,715 households pay more than 30% of their income towards a mortgage.

In comparison, the total for all renter households 47% (3,460 households out of 7,305) are cost burdened and 25% of owner households (5,635 out of 22,435) are cost burdened. This data indicates again, that housing cost burden is more likely to occur with households earning less than 80% of AMI, and with renter households compared to owner households.

Describe the characteristics and needs of Low-income individuals and families with children (especially extremely low-income) who are currently housed but are at imminent risk of either residing in shelters or becoming unsheltered 91.205(c)/91.305(c)). Also discuss the needs of formerly homeless families and individuals who are receiving rapid re-housing assistance and are nearing the termination of that assistance

There are 5,305 low-income households (defined as 50% below the Area Median Income) in Palm Coast including 689 (13%) households with one or more children 6 years old or younger. As may be expected in the City of Palm Coast with its high number of elderly population (62 and over), 2,795 (52%) of low-income households have one person over the age of 62.

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Approximately 2,825 (53.2%) of low-income households are severely cost-burdened (spend more than 50% of monthly income on housing) and at risk of homelessness. This includes 1,310 renters and 1,515 owners.

The needs of individual and families at-risk of homeless include short-term and long-term needs so that they may maintain self-sufficiency and not become displaced. The short-term need of these families is maintaining the housing they currently occupy along with acquiring the basic necessities (food, healthcare, and transportation). For renters, this short-term need could mean rent subsidies and utility assistance. For owners, it may mean temporary financial assistance for foreclosure prevention.

As a cost-burdened household (spending greater than 30% of monthly income on housing costs) there may be insufficient funds to cover other basic expenses such as food, medication, or transportation. A single event such as the loss of a job, a severe illness, or a sudden unexpected cost (significant auto/home repair) could mean the difference between maintaining a home or homelessness. Therefore, emergency financial assistance, reliable public transportation, and affordable health insurance are other needs that these families typically have. Long-term needs include employment training, educational programs, and access to jobs that pay decent wages. Additionally, for those cost-burdened families with children that are not yet school-aged, affordable high-quality childcare and early childhood programs are needed.

As for homeless families and individuals who are in rapid re-housing (*an intervention designed to quickly move families and individuals out of homelessness and into permanent housing*), the emphasis on the type of assistance to be provided is housing search and relocation services and short- and medium term rental assistance to move homeless people as rapidly as possible into permanent housing.

Additionally, as rapid re-housing participants transition to independent living, their needs consist of locating affordable housing including access to public housing. In order to remain stable in housing, other needs include job training and placement services to increase earning potential. Formerly homeless families and individuals may continue to need supportive services such as medical or mental health treatment and access to and mainstream benefits like Medicaid, SSI, or Temporary Assistance for Needy Families (TANF).

If a jurisdiction provides estimates of the at-risk population(s), it should also include a description of the operational definition of the at-risk group and the methodology used to generate the estimates:

The City of Palm Coast does not provide estimates of at-risk populations and, therefore, does not have a methodology for this.

Specify particular housing characteristics that have been linked with instability and an increased risk of homelessness

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Housing characteristics that indicate instability and increased risk for homelessness include a lack of affordable housing, housing cost burden especially for elderly persons, those living on a fixed income or those with low-wage job, overcrowding, and substandard housing conditions.

NA-15 Disproportionately Greater Need: Housing Problems – 91.205 (b)(2)

Assess the need of any racial or ethnic group that has disproportionately greater need in comparison to the needs of that category of need as a whole.

Introduction

This section identifies the existence of a disproportionately greater need due to **housing problems** within a particular income cohort as further categorized by race. Housing problems are as defined by HUD to include the following: 1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than one person per room, 4. Cost Burden greater than 30%.

The income cohorts used in the analysis are: households with 0-30% of Area Median Income; households with 30-50% of Area Median Income; households with 50-80% Area Median Income; and households with 80-100% of Area Median Income. Consistent with HUD's definition of "disproportionate need", a rate that is greater than 10% of the jurisdiction as a whole is deemed to be a "disproportionate need".

0%-30% of Area Median Income

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	1,635	170	365
White	1,160	145	345
Black / African American	365	0	15
Asian	0	0	0
American Indian, Alaska Native	0	25	0
Pacific Islander	0	0	0
Hispanic	90	0	0

Table 13 - Disproportionally Greater Need 0 - 30% AMI

Data 2013-2017 CHAS
Source:

*The four housing problems are:

1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than one person per room, 4. Cost Burden greater than 30%

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30%-50% of Area Median Income

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	2,110	1,015	0
White	1,555	745	0
Black / African American	360	115	0
Asian	10	70	0
American Indian, Alaska Native	0	0	0
Pacific Islander	0	0	0
Hispanic	178	85	0

Table 14 - Disproportionally Greater Need 30 - 50% AMI

Data 2013-2017 CHAS
Source:

*The four housing problems are:

1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than one person per room, 4. Cost Burden greater than 30%

50%-80% of Area Median Income

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	3,045	2,510	0
White	2,375	1,825	0
Black / African American	344	315	0
Asian	15	44	0
American Indian, Alaska Native	0	0	0
Pacific Islander	0	0	0
Hispanic	240	315	0

Table 15 - Disproportionally Greater Need 50 - 80% AMI

Data 2013-2017 CHAS
Source:

*The four housing problems are:

1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than one person per room, 4. Cost Burden greater than 30%

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80%-100% of Area Median Income

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	1,280	2,125	0
White	995	1,665	0
Black / African American	165	175	0
Asian	14	55	0
American Indian, Alaska Native	0	0	0
Pacific Islander	0	0	0
Hispanic	109	205	0

Table 16 - Disproportionally Greater Need 80 - 100% AMI

Data 2013-2017 CHAS
Source:

*The four housing problems are:

1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than one person per room, 4. Cost Burden greater than 30%

Discussion

Of all households earning 0 – 30% of the Area Median Income, 75% experience one or more of the housing problems as described above. African-American Households (96%), as well as Hispanic households (100%) have a disproportionately greater need.

Of all households earning 30 – 50% of the Area Median Income, 68% experience one or more of the housing problems described above. None of the subsets by racial or ethnic background within this income cohort show a disproportionately greater need.

Of all households earning 50-80% of the Area Median Income, 55% experience one or more of the housing problems described above. None of the subsets by racial or ethnic background within this income cohort show a disproportionately greater need.

Of all households earning 80-100% of the Area Median Income, 38% experience one or more of the housing problems described above. African-American households (49%) experience a disproportionately greater need for households within this income cohort.

NA-20 Disproportionately Greater Need: Severe Housing Problems – 91.205 (b)(2)

Assess the need of any racial or ethnic group that has disproportionately greater need in comparison to the needs of that category of need as a whole.

Introduction

This section identifies the existence of a disproportionately greater need due to **severe housing problems** within a particular income cohort as further categorized by race. Housing problems are as defined by HUD to include the following: 1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than one person per room, 4. Cost Burden greater than 50% (note that “Cost Burden” is the factor that distinguishes between housing problem and severe housing problem).

The income cohorts used in the analysis are: households with 0-30% of Area Median Income; households with 30-50% of Area Median Income; households with 50-80% Area Median Income; and households with 80-100% of Area Median Income. Consistent with HUD’s definition of “disproportionate need”, a rate that is greater than 10% of the jurisdiction as a whole is deemed to be a “disproportionate need”.

0%-30% of Area Median Income

Severe Housing Problems*	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	1,500	305	365
White	1,050	250	345
Black / African American	350	10	15
Asian	0	0	0
American Indian, Alaska Native	0	25	0
Pacific Islander	0	0	0
Hispanic	80	10	0

Table 17 – Severe Housing Problems 0 - 30% AMI

Data 2013-2017 CHAS
Source:

*The four severe housing problems are:

1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than 1.5 persons per room, 4. Cost Burden over 50%

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30%-50% of Area Median Income

Severe Housing Problems*	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	1,445	1,680	0
White	1,025	1,265	0
Black / African American	304	180	0
Asian	0	80	0
American Indian, Alaska Native	0	0	0
Pacific Islander	0	0	0
Hispanic	108	155	0

Table 18 – Severe Housing Problems 30 - 50% AMI

Data 2013-2017 CHAS
Source:

*The four severe housing problems are:

1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than 1.5 persons per room, 4. Cost Burden over 50%

50%-80% of Area Median Income

Severe Housing Problems*	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	955	4,600	0
White	750	3,455	0
Black / African American	55	604	0
Asian	15	44	0
American Indian, Alaska Native	0	0	0
Pacific Islander	0	0	0
Hispanic	90	460	0

Table 19 – Severe Housing Problems 50 - 80% AMI

Data 2013-2017 CHAS
Source:

*The four severe housing problems are:

1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than 1.5 persons per room, 4. Cost Burden over 50%

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80%-100% of Area Median Income

Severe Housing Problems*	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	210	3,195	0
White	150	2,510	0
Black / African American	35	310	0
Asian	10	60	0
American Indian, Alaska Native	0	0	0
Pacific Islander	0	0	0
Hispanic	20	290	0

Table 20 – Severe Housing Problems 80 - 100% AMI

Data 2013-2017 CHAS
Source:

*The four severe housing problems are:

1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than 1.5 persons per room, 4. Cost Burden over 50%

Discussion

Of all households earning 0 – 30% of the Area Median Income, 69% experience one or more of the housing problems as described above. African-American Households (93%), as well as Hispanic households (89%) have a disproportionately greater need.

Of all households earning 30 – 50% of the Area Median Income, 46% experience one or more of the housing problems described above. African-American Households (63%) show a disproportionately greater need.

Of all households earning 50-80% of the Area Median Income, 17% experience one or more of the housing problems described above. None of the subsets by racial or ethnic background within this income cohort shows a disproportionately greater need.

Of all households earning 80-100% of the Area Median Income, 6% experience one or more of the housing problems described above. None of the subsets by racial or ethnic background within this income cohort shows a disproportionately greater need.

NA-25 Disproportionately Greater Need: Housing Cost Burdens – 91.205 (b)(2)

Assess the need of any racial or ethnic group that has disproportionately greater need in comparison to the needs of that category of need as a whole.

Introduction:

This section compares the existence of housing cost burden and severe housing cost burden among racial groups against that of the jurisdiction (City) as a whole in order to identify disproportionately affected racial/ethnic groups. As previously discussed, disproportionately greater need is described by HUD as a rate that is greater than 10% of the jurisdiction as a whole.

Housing Cost Burden

Housing Cost Burden	<=30%	30-50%	>50%	No / negative income (not computed)
Jurisdiction as a whole	20,275	5,150	3,940	370
White	15,900	4,050	2,880	355
Black / African American	1,840	649	705	15
Asian	565	45	20	0
American Indian, Alaska Native	55	0	0	0
Pacific Islander	0	0	0	0
Hispanic	1,750	364	254	0

Table 21 – Greater Need: Housing Cost Burdens AMI

Data Source: 2013-2017 CHAS

Discussion:

The jurisdiction as a whole 5,150 of 29,735 households or 17% of all households have a housing cost burden of 30-50%. Additionally, 3,940 of 29,735 or 13% of all households in the City have a housing cost burden of greater than 50%. The cost burden for each racial group is provided below:

White households - 17.8% of white households have a housing cost burden of 30-50%, and 12.6% have a housing cost burden of greater than 50%.

African-American households – 20.3% have a housing cost burden of 30-50%, and 22% have a housing cost burden of greater than 50%.

Asian households - 7% have a housing cost burden of 30-50% and 3.5% have a housing cost burden of greater than 50%.

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Hispanic households – 15% have a housing cost burden of 30-50% and 10.7% have a housing cost burden of greater than 50%.

Based on the data provided, no racial or ethnic group is disproportionately impacted by a greater housing cost burden. These results are provided on the table below.

	Housing Cost Burden								
Race/Ethnicity	<=30%		30-50%		>50%		No / negative income (not computed)		Total Households
Jurisdiction as a whole	20,275	68%	5,150	17%	3,940	13%	370	1%	29,735
White	15,900	69%	4,050	17%	2,880	12%	355	2%	23,185
Black / African American	1,840	57%	649	20%	705	22%	15	0%	3,209
Asian	565	90%	45	7%	20	3%	0	0%	630
American Indian, Alaska Native	55	100%	0	0%	0	0%	0	0%	55
Pacific Islander	0	0%	0	0%	0	0%	0	0%	0
Hispanic	1,750	74%	364	15%	254	11%	0	0%	2,368

NA-30 Disproportionately Greater Need: Discussion – 91.205(b)(2)

Are there any income categories in which a racial or ethnic group has disproportionately greater need than the needs of that income category as a whole?

As shown on the housing cost burden table in the previous section no racial or ethnic group has a disproportionately greater need than the needs of that income category as a whole.

If they have needs not identified above, what are those needs?

Although there are no racial or ethnic group (as a whole) that experiences a disproportionately greater need in terms of housing cost burden, there are indications that within specific racial or ethnic groups combined with a specific income category there is a need to address housing problem.

This conclusion is indicated in the analysis of housing problems in Section NA-15 and NA-20 above.

The analysis for section NA-15 (disproportionately greater need - housing problem) indicates:

- Of all households earning 0 – 30% of the Area Median Income, African-American Households (96%), as well as Hispanic households (100%) have a disproportionately greater need.
- Of all households earning 80-100% of the Area Median Income, African-American households (49%) experience a disproportionately greater need for households within this income cohort.

The analysis for section NA-20 (disproportionately greater need – severe housing problem) indicates:

- Of all households earning 0 – 30% of the Area Median Income, African-American Households (93%), as well as Hispanic households (89%) have a disproportionately greater need.
- Of all households earning 30 – 50% of the Area Median Income, African-American Households (63%) show a disproportionately greater need.

Using the conclusions from the AFH, a greater variety in the available housing supply may assist in alleviating the cost burden faced by households for housing costs.

Are any of those racial or ethnic groups located in specific areas or neighborhoods in your community?

From the findings of the Assessment of Fair Housing (AFH), there are no identified concentrations of racial or ethnic groups in any particular census tract within the City of Palm Coast (i.e. there are no Racially/Ethnically Concentrated Areas of Poverty-RECAP) nor does the dissimilarity index indicate any segregation between any particular mix of races.

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NA-35 Public Housing – 91.205(b)

Introduction

The Flagler County Housing Authority (FCHA) is the local housing authority owns and operates 126 unit low income housing community located in the City of Bunnell. The housing authority does not manage any units within the City of Palm Coast. In addition to managing the public housing site in Bunnell, the FCHA manages the Section 8 voucher program for Flagler and Clay counties.

Totals in Use

	Program Type								
	Certificate	Mod-Rehab	Public Housing	Vouchers			Special Purpose Voucher		
				Total	Project - based	Tenant - based	Veterans Affairs Supportive Housing	Family Unification Program	Disabled *
# of units vouchers in use	0	0	126	257	0	243	12	0	0

Table 22 - Public Housing by Program Type

*includes Non-Elderly Disabled, Mainstream One-Year, Mainstream Five-year, and Nursing Home Transition

Data Source: PIC (PIH Information Center)

Characteristics of Residents

	Program Type								
	Certificate	Mod-Rehab	Public Housing	Vouchers			Special Purpose Voucher		
				Total	Project - based	Tenant - based	Veterans Affairs Supportive Housing	Family Unification Program	
Average Annual Income	0	0	9,213	13,971	0	14,128	10,360		0

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Program Type								
	Certificate	Mod-Rehab	Public Housing	Vouchers				
				Total	Project - based	Tenant - based	Special Purpose Voucher	
							Veterans Affairs Supportive Housing	Family Unification Program
Average length of stay	0	0	9	5	0	5	0	0
Average Household size	0	0	2	2	0	2	2	0
# Homeless at admission	0	0	0	0	0	0	0	0
# of Elderly Program Participants (>62)	0	0	22	73	0	69	3	0
# of Disabled Families	0	0	28	90	0	86	3	0
# of Families requesting accessibility features	0	0	126	257	0	243	12	0
# of HIV/AIDS program participants	0	0	0	0	0	0	0	0
# of DV victims	0	0	0	0	0	0	0	0

Table 23 – Characteristics of Public Housing Residents by Program Type

Data Source: PIC (PIH Information Center)

Race of Residents

Program Type									
Race	Certificate	Mod-Rehab	Public Housing	Vouchers					
				Total	Project - based	Tenant - based	Special Purpose Voucher		
							Veterans Affairs Supportive Housing	Family Unification Program	Disabled *
White	0	0	6	176	0	165	9	0	0

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Program Type									
Race	Certificate	Mod-Rehab	Public Housing	Vouchers					
				Total	Project - based	Tenant - based	Special Purpose Voucher		
							Veterans Affairs Supportive Housing	Family Unification Program	Disabled *
Black/African American	0	0	120	79	0	76	3	0	0
Asian	0	0	0	2	0	2	0	0	0
American Indian/Alaska Native	0	0	0	0	0	0	0	0	0
Pacific Islander	0	0	0	0	0	0	0	0	0
Other	0	0	0	0	0	0	0	0	0
*includes Non-Elderly Disabled, Mainstream One-Year, Mainstream Five-year, and Nursing Home Transition									

Table 24 – Race of Public Housing Residents by Program Type

Data Source: PIC (PIH Information Center)

Ethnicity of Residents

Program Type									
Ethnicity	Certificate	Mod-Rehab	Public Housing	Vouchers					
				Total	Project - based	Tenant - based	Special Purpose Voucher		
							Veterans Affairs Supportive Housing	Family Unification Program	Disabled *
Hispanic	0	0	0	29	0	29	0	0	0
Not Hispanic	0	0	126	228	0	214	12	0	0
*includes Non-Elderly Disabled, Mainstream One-Year, Mainstream Five-year, and Nursing Home Transition									

Table 25 – Ethnicity of Public Housing Residents by Program Type

Data Source: PIC (PIH Information Center)

Section 504 Needs Assessment: Describe the needs of public housing tenants and applicants on the waiting list for accessible units:

Section 504 is a civil rights law that prohibits discrimination against individuals with disabilities. A challenge in the City of Palm Coast is the availability of a diverse housing supply to accommodate renters across all income categories. It is difficult to quantify the needs of applicants on the waiting list, however, it is imperative for housing providers (private or public sector) to consider the need to diversify the City's housing supply which in turn can begin to address the needs of public housing tenants as well as tenants who have a need for accessible units.

Most immediate needs of residents of Public Housing and Housing Choice voucher holders

Based on the findings from the Assessment of Fair Housing (AFH), the City of Palm Coast continues to have a challenge with having a diverse choice of housing types. As stated in the AFH, nearly 89% of the City's housing units are in the form of single-family residential. The lack of multi-family housing limits the ability of individuals and families to find rental units at an affordable rate.

Housing Choice voucher holders are faced with the challenge of identifying housing units that are participants in the housing choice voucher program. Since participation in the housing choice voucher program is dependent on a property owner, it can become a challenge for the program to maintain an inventory of units available for tenants under the housing choice voucher program.

How do these needs compare to the housing needs of the population at large

The limited amount of multi-family housing units within the City creates a challenge for any potential renter. Housing choice voucher holders have the extra challenge of finding units that participate in the housing choice voucher program and are also available at an affordable rent.

NA-40 Homeless Needs Assessment – 91.205(c)

Introduction:

The information to populate this section relies mainly on data from the Volusia/Flagler County Coalition for the Homeless (VFCCH). The VFCCH is an administrative agency which serves as the lead agency for the region's Continuum of Care. The Continuum of Care is a regional or local planning body consisting of different agencies to coordinate services for the homeless, and at risk families and individuals. The data provided below is from the 2021 Flagler/Volusia Continuum of Care Point-in-Time (PIT) count. The PIT covers homeless data for both Flagler and Volusia counties, in some instances, the data is broken down to the county levels.

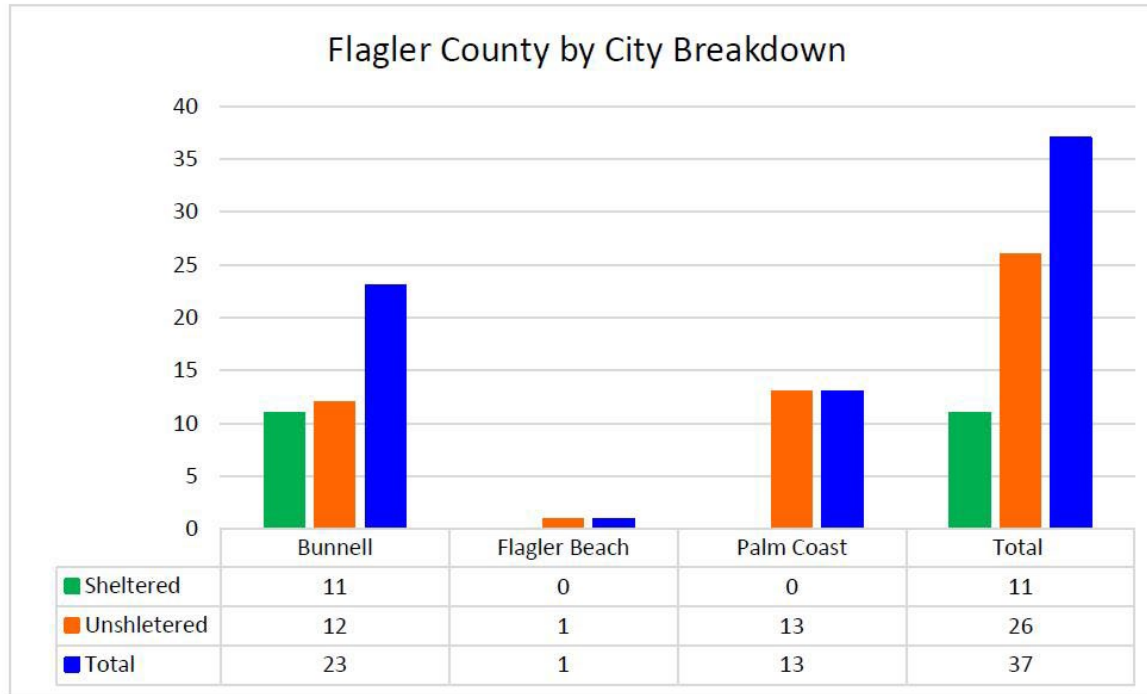
When available the Flagler County data is provided. As shown in the Chart below there were 37 homeless persons counted in Flagler County.

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Population	Estimate the # of persons experiencing homelessness on a given night		Estimate the # experiencing homelessness each year	Estimate the # becoming homeless each year	Estimate the # exiting homelessness each year	Estimate the # of days persons experience homelessness
	Sheltered	Unsheltered				
Persons in Households with Adult(s) and Child(ren)	178	--	0	0	0	0
Persons in Households with Only Children	0	--	0	0	0	0
Persons in Households with Only Adults	181	--	0	0	0	0
Chronically Homeless Individuals	20	--	0	0	0	0
Chronically Homeless Families	4	--	0	0	0	0
Veterans	25	--	0	0	0	0
Unaccompanied Child	13	--	0	0	0	0
Persons with HIV	0	--	0	0	0	0
TOTAL	359*	335**				
*This sum represents Persons In Households with Adult (s) and Children, Persons in Households with Only Children, and Persons in Households with Only Adults. The other categories are included within the totals for the specified categories.						
**In 2021, HUD gave communities the option to cancel or modify the unsheltered survey portion of their counts based on the potential risk of COVID-19 transmission associated with conducting an in -person survey. As a result, HUD has excluded the unsheltered population sub-totals and all unsheltered sub-population data for this reporting period. The user is cautioned that the unsheltered and total homeless counts reported here may be missing data.						

2021 Point-In-Time Counts for Volusia/Flagler Region

Flagler County Point in Time Count Total: **37**



2021 Flagler County Point-In-Time Counts

If data is not available for the categories "number of persons becoming and exiting homelessness each year," and "number of days that persons experience homelessness," describe these categories for each homeless population type (including chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth):

As previously stated, the data for this section is from the 2021 Flagler/Volusia Continuum of Care Point-in-Time (PIT) count. Due to the Volusia/Flagler County Coalition for the Homeless serving as the responsible agency for the Point In Time counts, the results of this count aggregates Volusia and Flagler County.

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The results of the 2021 Point-In-Time (PIT) count for the Volusia/Flagler County reveal the following demographics for homelessness within the Flagler County and Flagler/Volusia Region (As noted above, the 2021 PIT count did not provide subtotals for “unsheltered” populations).

- 37 homeless persons were counted in Flagler County. There is a total of 694 homeless individuals in the region. In Flagler County, the sheltered versus unsheltered homeless count is split approximately 30% to 70%. Regionwide, the homeless persons are split approximately 52/48 between sheltered and unsheltered locations.
- 181 sheltered persons are in households with only adults,
- 178 sheltered persons are in households with adults and children,
- 20 sheltered individuals are chronically homeless
- 4 sheltered chronically homeless are families,
- 25 sheltered individuals are veterans, and
- 13 sheltered individuals are unaccompanied children.

Estimate the number and type of families in need of housing assistance for families with children and the families of veterans.

See summary above.

Describe the Nature and Extent of Homelessness by Racial and Ethnic Group.

Based on the 2021 PIT count, the racial and ethnic group breakdown of the sheltered homeless population is as follows:

198 – White, 129 – Black or African-American, 1- American Indian or Alaska Native, and 31 – Multiple Race

30 – Hispanic/Latino, and 329 Non-Hispanic/Non-Latino

Describe the Nature and Extent of Unsheltered and Sheltered Homelessness.

As presented above the homeless population in the Volusia/Flagler County region are split roughly between sheltered and unsheltered population (359-sheltered and 335-unsheltered)

Discussion:

The City recognizes and acknowledges the data provided in the PIT counts. The City will work to support and assist as necessary the CoC agency serving Flagler County. The City plans to address homeless needs through other priorities in recognition of the following: limited funds are available to the City through the CDBG program to address all the needs in the City, the City's limited capacity to provide social services, the City recognizes that there are local agencies and services available, which will serve as a resource to address homeless needs and finally, a recognition that there are limited homeless persons in the City and that one of the most effective way to address homelessness in the City is to assist households from becoming homeless.

Prevention or assisting households from being homeless is an on-going strategy carried over from the previous Consolidated Action Plans. The activities carried out in the previous 5-years have included the expenditure of funds to assist low-moderate income households with home repair, expanding public services to assist low-moderate income households afford summer camp, and finally, providing public facilities and infrastructure that assists whole neighborhoods to maintain a desirability and livability condition that encourages additional new investment from the community. Additionally, when additional funding became available due to the COVID-19 pandemic, the City was able to assist 292 households in the City by providing a program that paid a household's utility bills for 6 months.

NA-45 Non-Homeless Special Needs Assessment - 91.205 (b,d)

Introduction:

The primary groups with non-homeless special needs in Palm Coast are the elderly, disabled (physical or mental), and those with HIV/AIDS (and their families). This section will provide demographic information on the special needs population and their need for assistance.

Describe the characteristics of special needs populations in your community:

Elderly and Disabled

Persons over the age of 65 make up 29% (25,488) of the population in the City of Palm Coast. 27% of the elderly population cohort (6,915) have a disability. Overall 14% of the total population 12,450 of 88,037 have a disability. The disability rate with the remaining age cohorts are 5.0% for persons under 18 years, and 10.1% for persons from 18 to 64 years.

Substance Abuse

The following data is from the *Flagler and Volusia County Region Community Health Needs Assessment (CHNA)*.

Average binge drinking rates in the state have been relatively stable since 2002 with approximately 15% to 18% of adults engaging in heavy or binge drinking. Rates in the service area counties have been generally consistent with this trend (Flagler County average of 17.4% between 2013 and 2019). The Behavioral Risk Factor Surveillance Survey defines binge drinking as, males having five or more drinks on one occasion, females having four or more drinks on one occasion.

Overdose death rates increased dramatically in Flagler County between 2013 and 2019. Fentanyl-related overdose deaths increased nearly eightfold in Flagler County between 2013 and 2019 (from 1.9 to 16.5 deaths/100,000). Overdoses on benzodiazepines and opioids nearly doubled in Flagler County from 2013 to 2019 (from 7.5 to 13.9 deaths/100,000 and from 14.0 to 25.2/100,000 deaths, respectively).

Domestic Violence

In 2019, there were 659 reported offenses categorized as “Domestic Violence”, of these offenses, the large majority of these cases (522) were listed as “Simple Assault”. The balance of the offenses are listed as “Aggravated Assault”, “Rape”, “Fondling”, and “Threat/Intimidation”. Each of these offenses provides a likelihood of the need to provide housing assistance in order to remove victims away from abusive situations or other support services to move a survivor away from their situation. This conclusion is primarily supported by data from the Florida Coalition Against Domestic Violence 2019 Annual Report that callers to the Florida Domestic Violence Hotline primarily requested assistance related to receiving shelter, support services, information regarding the civil and criminal justice system, and economic empowerment services that help survivors gain financial independence. Survivors also requested legal information related to divorce and child custody issues, parenting rights, and interstate jurisdiction. (Source: *Crime in Florida Abstract, Flagler County, 2019*)

What are the housing and supportive service needs of these populations and how are these needs determined?

Elderly and Disabled

As persons within a household get older, the challenges of becoming less mobile and living on a fixed income become more pronounced in housing decisions and the type of supportive service needs for that aging household. As mobility becomes limited, location factors such as proximity to health care, shopping and other services become real challenges to a household's capacity to remain within their existing housing unit. Additionally, the level of maintenance required for a housing unit becomes part of the equation in determining the appropriate housing unit for a household.

In addition to the challenges of limited mobility, elderly households tend to be on a fixed income. The income level available for a household for housing expenses needs to be balanced with likely increases in medical expenses.

Based on the 2020 American Community Survey, households in the City of Palm Coast headed by a person over 65 had a median income (\$51,536) which is 10 % less than the Area Median Income (\$57,872).

Substance Abuse

From the findings of the Community Health Needs Assessment, representatives from the core region of Flagler and Volusia County identified access to Behavioral Health Services targeting Adult Substance Use as a need to support the population suffering from substance abuse issues.

Additionally, typical service needs include: recovery-oriented services for implemented to address substance abuse both children and adults include detoxification, inpatient treatment, residential treatment, assessment, case management, supportive housing, crisis support, skill building, peer support, and counseling.

Victims of Domestic Violence

The Florida Coalition Against Domestic Violence identifies the following essential services for victims of domestic violence: survivor focused safety plans, counseling and advocacy, information and referrals for persons seeking assistance, child and youth-specific activities, youth-targeted education, education and training for adults.

Discuss the size and characteristics of the population with HIV/AIDS and their families within the Eligible Metropolitan Statistical Area:

The following data is from the *Centers for Disease Control, HIV Surveillance Data Tables, Vol. 1, No. 3*. The report focuses on the diagnoses of HIV infection among adults and adolescents in Metropolitan Statistical Areas (MSAs) in 2018. This is the most current report available which provides HIV/AIDS statistics by MSAs. Flagler County/Palm Coast is within the Deltona-Daytona Beach-Ormond Beach MSA.

In 2018, the Deltona-Daytona Beach-Ormond Beach MSA ranked 35th in the country for new HIV/AIDS Diagnosis at a rate of 15.4 new cases per 100,000 population with a prevalence rate of 338.9 per 100,000 persons.

When the infection rates are further categorized by sex, the MSA ranked 36th for new infections in adult and adolescent males at 25.4/100,000 and 30th for new infections in adult and adolescent females at 6.0/100,000. Adolescents are defined as persons over the age of 13.

The report further provides a breakdown of HIV/AIDS infection by age and sex cohorts.

- For adult and adolescent males, the rate of new infection for the 13-24 age cohort was 36.3/100,000, 71.1/100,000 for the 25-34 age cohort, 32.8/100,000 for the 35-44 age cohort, 25.6/100,000 for the 45-54 years, and 5.6/100,000 for the 55+ age cohort.
- For prevalence (total) of infections in adult and adolescent males, the rates are 136.2/100,000 in the 13-24 age cohort, 503.3/100,000 in the 25-34 age cohort, 524.6/100,000 in the 35-44 age cohort, 1039.3/100,000 in the 45-54 age cohort, and 445.7/100,000 in the 55+ age cohort.
- For adult and adolescent females, the rate of new infection for the 13-24 age cohort is 12.2/100,000, 8.2/100,000 for the 25-34 age cohort, 5.8/100,000 for the 35-44 age cohort, 12/100,000 for the 45-54 age cohort, and 2.1/100,000 in the 55+ age cohort.
- For prevalence (total) of infections in adult and adolescent females, the rates are 56.1/100,000 in the 13-24 age cohort, 153.3/100,000 in the 25-34 age cohort, 364.6/100,000 in the 35-44 age cohort, 403.2 in 45-54 age cohort, and 136/100,000 in the 55+ age cohort.

NA-50 Non-Housing Community Development Needs – 91.215 (f)

Describe the jurisdiction's need for Public Facilities:

As a growing municipality, based on the American Community Survey (ACS), the City of Palm Coast has grown by 11.2% based on the 2015 5-year ACS and 2020 5-year ACS from a population of 79,297 to 88,222. Typical with any growing community, the need for public facilities will be based on the requirement to provide the services needed to serve a growing population (expansion of water & sewer treatment facility, road expansion, etc.) and the desire to provide amenities to continue to attract new residents and visitors (parks, trails, open space, street lighting, and other amenities).

A review of the projects listed on the City's Capital Improvements Plan (CIP) indicate that there is a wide variety of public facilities needs in the City. Major capital projects in the most recent City budget, Fiscal Year 2022, include park renovations, expansion of recreational amenities (new trailhead, expansion of water access), expansion of street lighting, and expansion of the Water and Wastewater Treatment Plants' capacity.

How were these needs determined?

The needs for expanding water and sewer services are based on a capacity analysis of the demand based on projected population growth. Expanding recreation facilities were also based on an analysis of growing demand but also are determined through public input process to determine what type of improvements the public may want to see. Certain projects identified for implementation were also developed during the completion of the Recreation & Parks Facilities Master Plan. Although, this plan was created in 2008, projects are subject to review during the creation of the City's annual budget.

Describe the jurisdiction's need for Public Improvements:

The need for public improvements mirror the City's needs for public facilities.

How were these needs determined?

These needs were determined in the same manner as the need for public facilities.

Describe the jurisdiction's need for Public Services:

Like any growing city, there is a growing demand for additional public services within the City. Public services for elderly programs, child care programs, domestic violence, crime prevention, health care, as well as services for persons with disabilities, highlight the type of public services needed.

As provided by Flagler Cares, health care priorities include: telehealth capacity for mental health and primary care, suicide prevention initiatives in middle and high schools, suicide prevention initiatives targeting higher risk adults (e.g. African-American), and recruitment of mental health providers.

How were these needs determined?

Needs were determined based on consultation and correspondence with various non-profit and governmental social service providers. These various organizations, typically, conducts analysis and studies to assist them in determining gaps and where the needs exist. For example, the Volusia/Flagler County Coalition for the Homeless completed the Gaps and Needs Assessment Report on Homelessness in 2021. Flagler Cares in conjunction with regional partners recently completed a Community Health Needs Assessment (CHNA) to identify health issues, identify and engage local collaborators and assets, and to prioritize the implementation activities needed to address the identified issues.

Housing Market Analysis

MA-05 Overview

Housing Market Analysis Overview:

An analysis of the housing market entails a review of the housing market and supply in the community. Snapshot of the housing market includes a look at the trends in structure, age, price and tenure (owner versus renter).

As a planned community started in the late 1960s and early 1970s, what became known as the City of Palm Coast was platted with over 45,000 single-family residential lots. The initial community plan based on 45,000 single-family residential lots accounts for an inventory of housing units within the City which is predominantly single-family.

Since its incorporation as a City in 1999, the City of Palm Coast has seen a tremendous growth with the total population increasing about 18.7% from 75,180 in 2010 to 89,258 in 2020 (source: U.S. Decennial Census). Similarly, the number of housing units in the City has increased by about 22.3% percent from 27,184 in 2010 to 33,264 in 2020 (source: U.S. Census, 2010 & 2020 5-Year ACS).

In terms of housing costs, since 2010, the median housing value has increased by 3.5% from \$214,300 to \$221,800 in 2020. This is a relatively modest growth in home values based on the 5-Year American Community Survey (ACS). However, it is important to note that since 2020, the Palm Coast market has seen a significant increase in median price for homes on the market, various listing sources have the current median home price on the market anywhere from \$325,000 to \$350,000. This is a significant trend that directly plays a role in the ability of a household to purchase a home. This trend based on various sources may be attributed to issues in the supply chain for building materials, as well as a surge in demand due to slow-down during the COVID-19 shutdown.

Based on the 2010 & 2020 5-Year American Community Survey, between Year 2010 and 2020, the median contract rent increased by 30% from \$1,056 to \$1,374. During the same time period, the median household income increased by 20.5% from \$48,042 to \$57,872. (Source: 2010 & 2020 5-Year American Community Survey).

As shown on the tables provided by HUD, the housing inventory in the City of Palm Coast is predominantly composed of single-family residential units, Table 31 below shows that nearly 92% of all housing units are single family detached or attached units with the remainder in multi-family developments. The lack of diversity in housing supply along with data on housing costs (rent and market median home price) compared to household income, highlights the findings and anecdotal testimony that there is a challenge in affordability for households of various income ranges.

To assist residents with housing costs, the Flagler County Housing Authority administers 257 Housing Choice Vouchers (Section 8) in the City of Palm Coast. Additionally, the Housing Authority manages a 126-unit apartment complex. These housing programs provide a limited source of housing assistance for qualified households in the City.

Other sources of assistance for housing needs include the Volusia/Flagler County Coalition for the Homeless and a network of social service agencies which provides services to the homeless and non-homeless special needs persons.

MA-10 Number of Housing Units – 91.210(a)&(b)(2)

Introduction

The tables below will highlight the need to address the need to create housing variety in the City of Palm Coast. Nearly 92% of the housing stock in the city are either single-family attached or detached units. Additionally, the available units are mainly 3 or more bedrooms (90% -owner occupied, and 71% rental units).

All residential properties by number of units

Property Type	Number	%
1-unit detached structure	31,075	87%
1-unit, attached structure	1,765	5%
2-4 units	745	2%
5-19 units	835	2%
20 or more units	995	3%
Mobile Home, boat, RV, van, etc.	225	1%
Total	35,640	100%

Table 26 – Residential Properties by Unit Number

Data Source: 2013-2017 ACS

Unit Size by Tenure

	Owners		Renters	
	Number	%	Number	%
No bedroom	10	0%	215	3%
1 bedroom	85	0%	255	3%
2 bedrooms	2,215	10%	1,635	22%
3 or more bedrooms	20,125	90%	5,200	71%
Total	22,435	100%	7,305	99%

Table 27 – Unit Size by Tenure

Data Source: 2013-2017 ACS

Describe the number and targeting (income level/type of family served) of units assisted with federal, state, and local programs.

The City of Palm Coast has used CDBG funds to assist low-moderate income with housing repairs, from 2017 to 2021, the CDBG program assisted in the rehabilitation of 53 owner-occupied units. This program is available to all Palm Coast residents with a median income of less than 80% of the Area Median Income. The number of households assisted through the CDBG program will vary based on the availability of funds. A recent challenge to the program has been the rising costs in construction materials and labor,

due to the rising costs for construction, the program is challenged with having adequate funds to assist all qualified households.

A program similar to the City's CDBG rehabilitation program is administered by Flagler County using state funds. The SHIP program in addition to housing rehabilitation also offers a down-payment assistance program, as well as emergency repairs.

Provide an assessment of units expected to be lost from the affordable housing inventory for any reason, such as expiration of Section 8 contracts.

The City does not administer any affordable housing units or the Section 8 contracts. However, a review of the Shimberg Center data for the reported Low-Income Housing Tax Credit (LIHTC) housing units in the City states that the subsidy expiration for these units will not expire until 2055.

Does the availability of housing units meet the needs of the population?

As shown Table 21, 17% of households pay 30% to 50% of gross income for housing and 13% of households pay more than 50% of gross income for housing. These numbers indicate that there is a need to provide a greater variety of homes at various price points to address the needs of different households in the City.

Describe the need for specific types of housing:

As concluded from the recently completed Assessment of Fair Housing (AFH) and recent trends in housing costs, the issue of choice and affordability can partially be addressed through efforts to diversify the available housing stock in the City. The availability of more rental units could provide a family/household with a greater choice on owning or renting based on their current economic circumstances. Additionally, the availability of more rental units could create more competition in the available market rental units and impact the costs of rental housing in the City.

In addition to rental units, due to the significant increase in the market price for existing homes, there is also a market for "starter homes" in the City. These "starter homes" are typically characterized by its smaller size and lower costs.

Discussion

Overall, the City's housing supply is dominated by single-family residential units. Although the availability of multi-family housing units have increased since the City's incorporation, the conclusion from studies such as the AFH and anecdotal evidence is that there continues to be a need for housing diversity in the City.

Historically, the City's limited CDBG funds have been used to provide assistance for the rehabilitation of owner-occupied single-family units. This activity has the overall objective of maintaining a sustainable and

habitable living environment for low-moderate income households. Additionally, it helps to preserve the available low-moderate income housing stock in the City.

In 2021, the City initiated a first-time homebuyer program using CDBG funds. Flagler County through the SHIP program has been successful in assisting new homeowners. The City program in its initial year, currently has 6 active applicants who are waiting to receive final approval for income qualification, or a mortgage.

MA-15 Housing Market Analysis: Cost of Housing - 91.210(a)

Introduction

The following section discusses the trend in housing costs. As shown in Table 33, since the base Year 2009 Census, the median home value decreased by 19% from \$222,600 to \$181,400. This decrease can be attributed to the economic conditions for the comparison years. In 2009, economic conditions were starting to deteriorate, at this point home values were just starting to decrease from the peak value created by the boom in home construction during the early part of the 2000s. By 2017, homes have depreciated as a result of the recession, and the tightening of rules regarding mortgages. It is important to note that using the 2020 5-year American Community Survey the median home value in Palm Coast is \$221,800. This median value is still a slight decrease (.35%) from the 2009 median values.

As previously stated in this CAP, it is important to note that since 2020, the Palm Coast market has seen a significant increase in median price for homes on the market, various listing sources have the current median home price on the market anywhere from \$325,000 to \$350,000. This is a significant trend that directly plays a role in the ability of a household to purchase a home. This trend based on various sources may be attributed to issues in the supply chain for building materials, as well as a surge in demand due to slow-down during the COVID-19 shutdown.

As shown in Table 33, the median contract rent has increased by 12% from \$861 to \$965. When the provided data is expanded to include the 2020 5-year ACS, the contract rent increased 42% from \$965 (2017) to \$1374 (2020).

As shown on Table 34, nearly half of all renters paid over \$1,000 in rent. The next largest cohort is between \$500 and \$999 (51%). As summarized in Table 35, there are 2,135 rental units that are affordable to households earning 80% of the HAMFI. There are 4,325 owner occupied units that are affordable for households earning 80% of HAMFI.

Cost of Housing

	Base Year: 2009	Most Recent Year: 2017	% Change
Median Home Value	222,600	181,400	(19%)
Median Contract Rent	861	965	12%

Table 28 – Cost of Housing

Data Source: 2000 Census (Base Year), 2013-2017 ACS (Most Recent Year)

Rent Paid	Number	%
Less than \$500	605	8.3%
\$500-999	3,725	51.0%
\$1,000-1,499	2,550	34.9%

Rent Paid	Number	%
\$1,500-1,999	295	4.0%
\$2,000 or more	138	1.9%
Total	7,313	100.1%

Table 29 - Rent Paid

Data Source: 2013-2017 ACS

Housing Affordability

% Units affordable to Households earning	Renter	Owner
30% HAMFI	40	No Data
50% HAMFI	215	895
80% HAMFI	2,505	3,850
100% HAMFI	No Data	7,870
Total	2,760	12,615

Table 30 – Housing Affordability

Data Source: 2013-2017 CHAS

Monthly Rent

Monthly Rent (\$)	Efficiency (no bedroom)	1 Bedroom	2 Bedroom	3 Bedroom	4 Bedroom
Fair Market Rent	0	0	0	0	0
High HOME Rent	0	0	0	0	0
Low HOME Rent	0	0	0	0	0

Table 31 – Monthly Rent

Data Source Comments:

Is there sufficient housing for households at all income levels?

As shown Table 21, 17% of households pay 30% to 50% of gross income for housing and 13% of households pay more than 50% of gross income for housing. These numbers indicate that there is a need to provide a greater variety of homes at various price points to address the needs of different households in the City.

The insufficiency of housing for households at all income levels is illustrated by the # of units available for households within a certain income level. As shown on Table 35, there are 40 units affordable to households earning 30% of HUD Area Median Family Income (HAMFI), based on the 2013-2017 ACS, there are 2,165 households that earn 30% or less. Similarly there are 1,110 units available for households earning 50% of HAMFI, there are 3,135 households within this category. Table 35 further shows that 6,355 units are available for households in the 80% HAMFI category, there are 5,555 households in this income

category. Finally, there are 7,870 units available for households within the 100% HAMFI category, there are 3,405 families within this income categories.

This data, as provided by HUD indicates that there are adequate affordable units for households earning 50% or more of the HAMFI, however, there is an insufficient number of units available for households below 50% of HAMFI.

How is affordability of housing likely to change considering changes to home values and/or rents?

As previously discussed, it is important to note that since 2020, the Palm Coast market has seen a significant increase in median price for homes on the market, various listing sources have the current median home price on the market anywhere from \$325,000 to \$350,000. This is a significant trend that directly plays a role in the ability of a household to purchase a home. This trend based on various sources may be attributed to issues in the supply chain for building materials, as well as a surge in demand due to slow-down during the COVID-19 shutdown. Additionally, according to the 2010 & 2020 5-Year American Community Survey, between Year 2010 and 2020, the median contract rent increased by 30% from \$1,056 to \$1,374.

The combined factors of increasing resale value and increasing rent will likely lead to a more challenging environment for households to maintain their housing burden to below 30% of their household income. As previously covered, increasing housing prices (for rent or for sale) will have greater impact on households who earn 50% or less of HAMFI since there is already an insufficient amount of housing units available for households within this income range.

How do HOME rents / Fair Market Rent compare to Area Median Rent? How might this impact your strategy to produce or preserve affordable housing?

The Palm Coast Area Median Rent in 2020 (based on the 5-year ACS) is \$1,374. The 2020 Fair Market Rent in Palm Coast based on HUD calculations is \$1,121 (this is for a 2-bedroom unit). *(Fair Market Rent is generally calculated as **the 40th percentile of gross rents for regular, standard quality units in a local housing market**. This excludes low-quality units, already subsidized units, and units that have been built in the last 2 years).*

The City does not receive HOME funds. The City currently does not offer rental assistance as part of the CDBG program.

MA-20 Housing Market Analysis: Condition of Housing – 91.210(a)

Introduction

This section provides information on the condition of housing units in the City of Palm Coast by looking at factors such as the condition of housing units, year of construction, risk based on lead paint, and vacancy.

Definitions

As stated in HUD guidelines, the four following conditions are problematic: 1) home lacks complete or adequate kitchen facilities, 2) home lacks complete or adequate plumbing facilities 3) home is overcrowded – defined as more than one person per room, and 4) the household is cost burdened by paying more than 30% of their income towards housing costs.

Condition of Units

Condition of Units	Owner-Occupied		Renter-Occupied	
	Number	%	Number	%
With one selected Condition	5,810	26%	3,315	45%
With two selected Conditions	70	0%	280	4%
With three selected Conditions	10	0%	0	0%
With four selected Conditions	0	0%	0	0%
No selected Conditions	16,550	74%	3,710	51%
Total	22,440	100%	7,305	100%

Table 32 - Condition of Units

Data Source: 2013-2017 ACS

Year Unit Built

Year Unit Built	Owner-Occupied		Renter-Occupied	
	Number	%	Number	%
2000 or later	11,415	51%	3,479	48%
1980-1999	9,370	42%	3,130	43%
1950-1979	1,470	7%	670	9%
Before 1950	180	1%	19	0%
Total	22,435	101%	7,298	100%

Table 33 – Year Unit Built

Data Source: 2013-2017 CHAS

Risk of Lead-Based Paint Hazard

Risk of Lead-Based Paint Hazard	Owner-Occupied		Renter-Occupied	
	Number	%	Number	%
Total Number of Units Built Before 1980	1,650	7%	689	9%

Housing Units build before 1980 with children present	2,820	13%	1,550	21%
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Table 34 – Risk of Lead-Based Paint

Data Source: 2013-2017 ACS (Total Units) 2013-2017 CHAS (Units with Children present)

Vacant Units

	Suitable for Rehabilitation	Not Suitable for Rehabilitation	Total
Vacant Units	0	0	0
Abandoned Vacant Units	0	0	0
REO Properties	0	0	0
Abandoned REO Properties	0	0	0

Table 35 - Vacant Units

Data Source: 2005-2009 CHAS

Need for Owner and Rental Rehabilitation

As shown in Table 37 above, 26% of all owner-occupied housing units have one of the problematic conditions stated in HUD guidelines. For renter-occupied units, 49% have one of the selected conditions. The existence of one of the selected conditions in the housing supply is partially addressed by the City's CDBG activity to provide financial assistance to repair owner-occupied single-family residential units.

As shown in Table 38, 50% of all housing units in the City was built in 2000 or later, as a fairly new city, it is not unexpected that the City of Palm Coast's housing supply would be in relatively good shape. However, keeping the housing supply in good shape is a challenge for every municipality, housing units fall into disrepair due to an owner's financial constraints, or just by negligence. Again, the City's CDBG objective is intended to address this issue by providing financial assistance to repair owner-occupied single family residential units.

Estimated Number of Housing Units Occupied by Low or Moderate Income Families with LBP Hazards

Table 39 above shows the number of housing units which are at risk for lead-based paint. As part of the City's on-going activity with home repairs, homes that have the potential for having lead based paint are analyzed and are mitigated as required by HUD regulations.

Discussion

MA-25 Public and Assisted Housing – 91.210(b)

Introduction

The Flagler County Housing Authority which administers the Section 8 Housing Choice Voucher program for Flagler/Clay counties currently do not manage any affordable housing units within the City of Palm Coast. However, the Housing Authority does manage 391 housing vouchers in Flagler County (Source: Florida Housing Finance Corporation).

Totals Number of Units

	Certificate	Mod-Rehab	Public Housing	Program Type					
				Vouchers					
				Total	Project -based	Tenant -based	Special Purpose Voucher		
							Veterans Affairs Supportive Housing	Family Unification Program	Disabled *
# of units vouchers available			132	184			0	0	0
# of accessible units									
*includes Non-Elderly Disabled, Mainstream One-Year, Mainstream Five-year, and Nursing Home Transition									

Table 36 – Total Number of Units by Program Type

Data Source: PIC (PIH Information Center)

Describe the supply of public housing developments:

Describe the number and physical condition of public housing units in the jurisdiction, including those that are participating in an approved Public Housing Agency Plan:

At this time the Flagler County Housing Authority does not own/manage any units within the City of Palm Coast.

Public Housing Condition

Public Housing Development	Average Inspection Score

Table 37 - Public Housing Condition

Describe the restoration and revitalization needs of public housing units in the jurisdiction:

N/A. There are currently no public housing units participating in an approved Public Housing Agency Plan.

Describe the public housing agency's strategy for improving the living environment of low- and moderate-income families residing in public housing:

N/A. There are currently no public housing units participating in an approved Public Housing Agency Plan.

MA-30 Homeless Facilities and Services – 91.210(c)

Introduction

Facilities and Housing Targeted to Homeless Households

	Emergency Shelter Beds		Transitional Housing Beds	Permanent Supportive Housing Beds	
	Year Round Beds (Current & New)	Voucher / Seasonal / Overflow Beds	Current & New	Current & New	Under Development
Households with Adult(s) and Child(ren)	202	3	166	337	0
Households with Only Adults	137	0	91	325	0
Chronically Homeless Households	0	0	0	91	0
Veterans	20	0	0	340	0
Unaccompanied Youth	0	0	30	119	0

Table 38 - Facilities and Housing Targeted to Homeless Households

Data Source Comments:

Describe mainstream services, such as health, mental health, and employment services to the extent those services are used to complement services targeted to homeless persons

The Volusia/Flagler County Coalition for the Homeless (VFCCH) is the lead agency for the Commission on Homelessness and Housing (CoHH) which represents the HUD designated Continuum of Care (CoC) for Volusia and Flagler Counties. The COHH through its lead agency (the VFCCH) is responsible for conducting the annual count of the homeless, for identifying the gaps in available housing and services to the subpopulations of homeless, and strategically planning and organizing the expansion of housing and supportive services to meet the needs. These “gaps” are missing services that are needed to ensure that clients can successfully exit homelessness.

Taking direction from CoHH’s strategic plan, the mission to provide outreach to the homeless and inform them of the network of services available to them has been accomplished by many groups in the community, including volunteers, agency providers, churches, veteran’s counselors, and 2-1-1 First Call for Help system.

Homeless providers which are part of the Continuum of Care (CoC), make the following services available:

- Halifax Urban Ministries- Hope Place: provides housing and supportive services to literally homeless families with children and unaccompanied homeless youth.
- Halifax Urban Ministries Barracks of Hope: Veteran GPD (Grant Per Diem) program provides transitional housing for 20 low demand veterans.
- First Step Shelter provides emergency shelter collaborates with community housing providers, churches and other community stakeholders to accept homeless individuals into the emergency shelter component.
- Neighborhood Center of West Volusia provides street outreach to literally homeless individuals and linkage to the Bridge Emergency Shelter in Deland.
- The Salvation Army has provided Street Outreach to Volusia County and Flagler County.
- Flagler Cares is a broad, county-wide initiative to expand the safety net for Flagler citizens in need, to build a coordinated system of social, financial and health services, and to decrease societal and personal costs by providing services as efficiently as possible. Flagler Cares provides outreach to homeless and at risk of homeless individuals and families and coordinates with the CoC through the Coordinated Entry process for linkage to Prevention, Rapid Rehousing and Permanent Supportive Housing solutions
- Rising Against All Odds, Inc. focuses on Outreach HIV Testing, Counseling, Community Support, Resource, Referral Center and collaborative Comprehensive Case Management in West Volusia.

- I-Dignity Program: provides assistance in obtaining Florida ID cards, birth certificates and social security cards with assistance from legal counsel and the U.S. Department of Veterans affairs. (although temporarily limited by COVID-19).
- SMA Healthcare: through a partnership with West Volusia Hospital Authority homeless individuals receive psychiatric medications and consultation.
- SMA's Pathways program provides case management services to chronically homeless individuals with disabilities to include intensive case management, counseling, medication management, housing assistance, SOAR processing and assistance with maintaining housing once housed.
- HMIS: captures client information on the homeless to meet their needs through better information to guide them through the delivery system. HMIS creates client records and serves as a conduit for the homeless to crossover from the street to needed services.

List and describe services and facilities that meet the needs of homeless persons, particularly chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth. If the services and facilities are listed on screen SP-40 Institutional Delivery Structure or screen MA-35 Special Needs Facilities and Services, describe how these facilities and services specifically address the needs of these populations.

The list provided above provides a quick summary of the facilities and services offered to the homeless population by the various service agencies.

MA-35 Special Needs Facilities and Services – 91.210(d)

Introduction

Completion of this Consolidated Action Plan requires coordination with various social service agencies or organizations that either provide or coordinate a response to supportive housing or homeless issues including the Volusia/Flagler County Coalition for the Homeless (VFCCH). As the coordinating agency for the homeless issue in Volusia and Flagler Counties, VFCCH is responsible for conducting the annual count of the homeless and for identifying the gaps in available housing and services to the subpopulations of homeless, and strategically planning and organizing the expansion of housing and supportive services to meet the needs. These “gaps” are missing services that are needed to ensure that clients can successfully exit homelessness.

City staff fully recognizes the limitations presented by the available City resources to respond to supportive housing issues. The City acknowledges the findings of the “2021 Gaps and Needs Assessment Report on Homelessness” as completed by VFCCH. This report sets the basis for the coordinated response to questions presented in this Consolidated Action Plan. All programs utilize the Coordinated Entry System facilitated by the Volusia Flagler County Coalition for the Homeless to link individuals and families to permanent housing solutions.

Including the elderly, frail elderly, persons with disabilities (mental, physical, developmental), persons with alcohol or other drug addictions, persons with HIV/AIDS and their families, public housing residents and any other categories the jurisdiction may specify, and describe their supportive housing needs

In the City of Palm Coast, persons 65 years and over account for 28.9% of the total population (2016-2020, 5-Year ACS). This population cohort, as expected, have a higher rate of disability or mobility issues than other population cohorts within the City. The needs of the elderly/frail elderly may often include a lack of access to transportation services that may help a household stay in their homes and continue to have access to health care services, and everyday needs such as shopping. Other supportive housing needs may include the physical retrofitting of a home to accommodate physical limitations (ramps, or grab bars in bathrooms).

For persons with disabilities (mental, physical, developmental) and persons with alcohol or other drug addictions, a continuing challenge is the need to better align housing needs and health care need (counseling, treatment, etc.). An on-going challenge for service providers is the capacity to expand services due to inadequate funding.

In discussion with certain social service providers the supportive housing need for individuals with HIV/AIDS and their families is typically the requirement for a greater amount of access to healthcare

support than the general population. Sometimes, the cost of maintaining treatment creates a financial burden that puts the patient and their family at risk of becoming homeless.

From discussion with public housing service provider, public housing residents typically benefit from services such as training to improve job skills, and job search assistance.

Describe programs for ensuring that persons returning from mental and physical health institutions receive appropriate supportive housing

As stated in the introduction to this section of the Consolidated Action Plan, City staff fully recognizes the limitations presented by the available City resources to respond to supportive housing issues. The City acknowledges the findings of the “2021 Gaps and Needs Assessment Report on Homelessness” as completed by VFCCCH. This report sets the basis for the coordinated response to questions presented in this Consolidated Action Plan. All programs utilize the Coordinated Entry System facilitated by the Volusia Flagler County Coalition for the Homeless to link individuals and families to permanent housing solutions.

As identified in the Gaps and Needs Assessment, the following agencies continue to provide emergency and/or transitional housing and services to families, individuals, youth, and the special needs populations. The Beacon Center serving Volusia County and the Flagler Family Life Center provide emergency housing for homeless women with or without children who are fleeing domestic violence. Additionally, the following agencies provide emergency shelter beds and services to families, individuals, youth and the special needs population: The Beacon Center, Flagler Family Life Center, The Salvation Army, The Neighborhood Center of West Volusia and Hope Place.

As reported in the Gaps and Needs Analysis, Permanent Supportive Housing (PSH) continues to be needed in the area. There were 433 PSH beds on the housing inventory chart, half of which were dedicated Veterans Affairs Supportive Housing (VASH) vouchers (facilitated by the public housing authorities) for Veterans. The remainder of the PSH beds fill to capacity very quickly once vacated. The lack of Permanent Supportive Housing in this community is very concerning. The By-Name-List contains over 200 individuals and households that scored in the Permanent Supportive Housing range on their VI-SPDAT. While some may be able to be served in Rapid Rehousing with increased case management, the combination of high numbers scoring in the PSH range coupled with the high percentage of chronic homeless, indicates that Permanent Supportive Housing is among the most significant needs in the FL-504 CoC.

Specify the activities that the jurisdiction plans to undertake during the next year to address the housing and supportive services needs identified in accordance with 91.215(e) with respect to persons who are not homeless but have other special needs. Link to one-year goals. 91.315(e)

As previously stated, the City is committed to coordinating and cooperating with social agencies, to the extent feasible, in providing services and support to special needs population. Given the limited amount of funding available through the CDBG program, the City at the recommendation of the CDBG Advisory Board will allocate the maximum amount available for Public Services (15%). This amount is available for a social service provider through a grant program.

For entitlement/consortia grantees: Specify the activities that the jurisdiction plans to undertake during the next year to address the housing and supportive services needs identified in accordance with 91.215(e) with respect to persons who are not homeless but have other special needs. Link to one-year goals. (91.220(2))

See response in previous section.

MA-40 Barriers to Affordable Housing – 91.210(e)

Negative Effects of Public Policies on Affordable Housing and Residential Investment

The City of Palm Coast is committed to creating safe, diverse, and affordable housing to all its residents. The primary goal of this commitment is to promote the City as a desirable and sustainable place to live, work, and play.

In 2022, the City in conjunction with Flagler County reviewed affordable housing incentives provided as part of the State Housing Initiatives Partnership (SHIP) program. The SHIP program relies on state funds to fund various affordable housing activities such as rehabilitation, homebuyer assistance, and new construction assistance.

The review of the incentives resulted in the revision of some incentives to clarify and make the incentives more useful for developers of affordable housing. Incentives for affordable housing such as increased densities, flexibility in infrastructure design (roads), lot sizes, setbacks, or other development standards are provided and available through the Master Planned Development review process.

It is important to note that these incentives are provided due to the recognition that the more rigid standard of a conventional zoning district such as minimum lot size, minimum home size, and minimum setbacks can limit the affordability of a housing unit.

Finally, as part of the incentives review, it is important to note that an on-going review of ordinances and policies and their impact on affordable housing will be part of the proposed legislation's analysis.

MA-45 Non-Housing Community Development Assets – 91.215 (f)

Introduction

This section provides an overview of the economic condition in the City of Palm Coast. All data in this section was provided by HUD.

Economic Development Market Analysis

Business Activity

Business by Sector	Number of Workers	Number of Jobs	Share of Workers %	Share of Jobs %	Jobs less workers %
Agriculture, Mining, Oil & Gas Extraction	201	26	1	0	-1
Arts, Entertainment, Accommodations	4,857	2,618	20	21	1
Construction	2,054	1,043	8	8	0
Education and Health Care Services	4,952	2,679	20	21	1
Finance, Insurance, and Real Estate	1,590	653	6	5	-1
Information	661	596	3	5	2
Manufacturing	1,669	734	7	6	-1
Other Services	1,046	632	4	5	1
Professional, Scientific, Management Services	1,749	568	7	5	-2
Public Administration	0	0	0	0	0
Retail Trade	4,166	2,626	17	21	4
Transportation and Warehousing	682	145	3	1	-2
Wholesale Trade	968	231	4	2	-2
Total	24,595	12,551	--	--	--

Table 39 - Business Activity

Data Source: 2013-2017 ACS (Workers), 2017 Longitudinal Employer-Household Dynamics (Jobs)

Labor Force

Total Population in the Civilian Labor Force	33,590
Civilian Employed Population 16 years and over	31,390
Unemployment Rate	6.59
Unemployment Rate for Ages 16-24	11.20
Unemployment Rate for Ages 25-65	4.16

Table 40 - Labor Force

Data Source: 2013-2017 ACS

Occupations by Sector	Number of People
Management, business and financial	5,450
Farming, fisheries and forestry occupations	1,855
Service	3,715
Sales and office	10,450
Construction, extraction, maintenance and repair	2,505
Production, transportation and material moving	1,685

Table 41 – Occupations by Sector

Data Source: 2013-2017 ACS

Travel Time

Travel Time	Number	Percentage
< 30 Minutes	18,260	63%
30-59 Minutes	8,850	30%
60 or More Minutes	2,085	7%
Total	29,195	100%

Table 42 - Travel Time

Data Source: 2013-2017 ACS

Education:

Educational Attainment by Employment Status (Population 16 and Older)

Educational Attainment	In Labor Force		Not in Labor Force
	Civilian Employed	Unemployed	
Less than high school graduate	960	135	1,135

Educational Attainment	In Labor Force		Not in Labor Force
	Civilian Employed	Unemployed	
High school graduate (includes equivalency)	7,995	720	4,640
Some college or Associate's degree	10,405	610	4,230
Bachelor's degree or higher	5,685	120	1,685

Table 43 - Educational Attainment by Employment Status

Data Source: 2013-2017 ACS

Educational Attainment by Age

	Age				
	18–24 yrs.	25–34 yrs.	35–44 yrs.	45–65 yrs.	65+ yrs.
Less than 9th grade	85	18	170	475	1,040
9th to 12th grade, no diploma	825	144	150	1,280	1,500
High school graduate, GED, or alternative	2,590	2,460	3,515	7,390	7,430
Some college, no degree	1,805	2,345	2,450	6,175	4,965
Associate's degree	370	1,170	1,005	2,100	1,845
Bachelor's degree	175	1,370	970	2,750	3,130
Graduate or professional degree	65	240	715	1,445	2,360

Table 44 - Educational Attainment by Age

Data Source: 2013-2017 ACS

Educational Attainment – Median Earnings in the Past 12 Months

Educational Attainment	Median Earnings in the Past 12 Months
Less than high school graduate	42,470
High school graduate (includes equivalency)	55,875
Some college or Associate's degree	59,650
Bachelor's degree	66,955
Graduate or professional degree	83,435

Table 45 – Median Earnings in the Past 12 Months

Data Source: 2013-2017 ACS

Based on the Business Activity table above, what are the major employment sectors within your jurisdiction?

Based on the Business Activity table. The major employment sectors within Palm Coast are Arts, Entertainment, & Accommodations, Education & Health Care Services, and Retail Trade which together account for 60% of the jobs in the City.

Describe the workforce and infrastructure needs of the business community:

The City of Palm Coast provides water and wastewater service through the City's Utility Dept. There is currently adequate water and wastewater treatment capacity to accommodate the anticipated growth in the City and adjacent areas which are served by the City's utilities. On a regular basis, as demand increases for water and wastewater service, the Utility Dept. undertakes a capacity analysis that determines the need for expansion of treatment facilities (water or wastewater).

In addition to water and wastewater services, the transportation facility (roads) is another infrastructure provided by the City which serves all businesses in the City. The necessity to keep roads at a level of service that moves people and goods is important to ensure that businesses continue to thrive in the City and at the same time plays a role in a residents' quality of life (congestion, pollution from congestion, are all typically viewed as negative indicators in quality of life).

A workforce need highlighted by the findings from the Assessment of Fair Housing (AFH) is the need to provide better connectivity between housing and jobs. This need is further enhanced by the necessity or dependence on private mode of travel due to the lack of a fixed route transit system in Flagler County. This dependence on private mode of travel may make access to the job market (within the City or within the region) a challenge for some residents.

Anecdotally, the recent surge in construction activity has also highlighted a challenge that the construction industry has faced, the lack of qualified skill workers for the construction industry. This challenge is faced by the industry as a whole and not just within the City of Palm Coast.

Describe any major changes that may have an economic impact, such as planned local or regional public or private sector investments or initiatives that have affected or may affect job and business growth opportunities during the planning period. Describe any needs for workforce development, business support or infrastructure these changes may create.

The City of Palm Coast is predominantly a residential community. Recent development history in the City has shown a very active residential and non-residential construction industry. The on-going population growth has promoted the expansion of retail, restaurant, and other services to serve the population.

How do the skills and education of the current workforce correspond to employment opportunities in the jurisdiction?

The skills and education of the current workforce has typically corresponded to the employment opportunities in the jurisdiction. However, as previously stated the current construction boom in the City

has highlighted the statewide deficiency in having adequate skilled workers in the various construction trades (electrical, plumbing, framers).

Describe any current workforce training initiatives, including those supported by Workforce Investment Boards, community colleges and other organizations. Describe how these efforts will support the jurisdiction's Consolidated Plan.

The City is currently not involved in any workforce training initiatives.

Does your jurisdiction participate in a Comprehensive Economic Development Strategy (CEDS)?

Yes

If so, what economic development initiatives are you undertaking that may be coordinated with the Consolidated Plan? If not, describe other local/regional plans or initiatives that impact economic growth.

Opportunities for coordination of economic activities with the Consolidated Plan may be limited due to the limited funding available through the CDBG program. However, should specific economic activities arise which may be eligible for CDBG funds, full consideration should be given to funding such activities.

MA-50 Needs and Market Analysis Discussion

Are there areas where households with multiple housing problems are concentrated? (include a definition of "concentration")

A review of the available data provided by HUD and used in the recently completed (March 2022) Assessment of Fair Housing (AFH) does not indicate that households with multiple housing problems are concentrated within any census tract in the City.

Are there any areas in the jurisdiction where racial or ethnic minorities or low-income families are concentrated? (include a definition of "concentration")

A review of the available data provided by HUD and used in the recently completed (March 2022) Assessment of Fair Housing (AFH) does not indicate that households with multiple housing problems are concentrated within any census tract in the City. The term concentration as used in this section comes from the HUD description of "Racially or Ethnically Concentrated Areas of Poverty" or RECAPs. These areas are described as Census Tracts where: (1) the non-white population comprises 50 percent or more of the total population and (2), the percentage of individuals living in households with incomes below the poverty rate is either (a) 40 percent or above or (b) three times the average poverty rate for the metropolitan area, whichever is lower.

What are the characteristics of the market in these areas/neighborhoods?

A review of the available data provided by HUD and used in the recently completed (March 2022) Assessment of Fair Housing (AFH) does not indicate that households with multiple housing problems are concentrated within any census tract in the City.

Are there any community assets in these areas/neighborhoods?

A review of the available data provided by HUD and used in the recently completed (March 2022) Assessment of Fair Housing (AFH) does not indicate that households with multiple housing problems are concentrated within any census tract in the City.

Are there other strategic opportunities in any of these areas?

A review of the available data provided by HUD and used in the recently completed (March 2022) Assessment of Fair Housing (AFH) does not indicate that households with multiple housing problems are concentrated within any census tract in the City.

MA-60 Broadband Needs of Housing occupied by Low- and Moderate-Income Households - 91.210(a)(4), 91.310(a)(2)

Describe the need for broadband wiring and connections for households, including low- and moderate-income households and neighborhoods.

According to the 2020 5-Year American Community Survey (ACS), 90% of all households in Palm Coast have internet service. 76% of internet access is through a broadband subscription. Due to the City of Palm Coast as a suburban area with readily available utilities, it is indicative that internet and/or broadband service is also readily accessible in most parts of the City.

Describe the need for increased competition by having more than one broadband Internet service provider serve the jurisdiction.

The availability of competing providers of broadband internet benefits the consumer in having a choice of service and likely pricing structure. In addition to established broadband providers such as AT&T or Spectrum, MetroNet recently began construction of a fiber-optic internet system that will provide service to the entire Palm Coast area. Palm Coast is the second City in Florida to be serviced by MetroNet.

MA-65 Hazard Mitigation - 91.210(a)(5), 91.310(a)(3)

Describe the jurisdiction's increased natural hazard risks associated with climate change.

Typical natural hazards that impact Florida include drought, floods, wildfire, extremely cold weather, hurricanes, lightning, severe thunderstorms, heat waves, tornadoes, and marine hazards such as rip currents and waterspouts, according to the Florida Division of Emergency Management. According to FEMA one major issue caused by climate change that will have a direct impact on the natural hazards seen in Florida is sea level rise. In addition to the impacts associated with sea-level rise, many of the hazards are likely to intensify and increase in frequency with the rising temperatures. Being located along the coast, Palm Coast/Flagler County is most susceptible to flooding, hurricanes, severe thunderstorms, lightning, heat waves, wildfires, extremely cold weather, tornadoes, and drought.

Describe the vulnerability to these risks of housing occupied by low- and moderate-income households based on an analysis of data, findings, and methods.

Outlined in the Needs Assessment section of this Plan, the primary housing issue experienced by low and-moderate income households within the City is being cost-burdened or severely cost burdened.

One of the consequences of having a cost-burden in providing a basic necessity such as housing, would be the challenge in having additional resources to prepare for a natural disaster. Preparing for a disaster, whether it's having adequate food for a post disaster situation or preparing a home for a disaster (boarding up windows, installing storm shutters, etc.) all require financial resources.

Additionally, for homeowners, there is always the challenge of having affordable homeowners insurance. The last few years have seen some turmoil in the home insurance industry in Florida with insurers not renewing policies, or significant rate increases in insurance policies (30-40% from 2021 to 2022).

Strategic Plan

SP-05 Overview

Strategic Plan Overview

In order to spend CDBG dollars effectively, the City will prioritize projects and activities as high, medium, or low priorities based on the information obtained from the above resources.

High (H) Priority: High priority projects and activities are generally recognized as addressing a direct need identified by data and/or City objective. The available funding sources (CDBG, City funding, and other federal or state programs, etc.) are such that they are adequate to complete a particular task for qualified beneficiaries (households or individuals).

Medium (M) Priority: Projects and activities with a medium priority are considered important enough to address, if appropriate funding is available during the planning period.

Low (L) Priority: To the extent that funds are available, the City will look to implement activities with a “Low” priority. The city recognizes the importance of addressing all housing and community development needs, but understands that limited funding should target activities or priorities which may affect the most qualified beneficiaries.

It is the City’s intent to implement and prioritize activities that will circulate the available funding most efficiently and in a timely manner. It is therefore viewed that the potential pool of beneficiaries or potential participants for funding will be an important factor in determining how activities or projects will be prioritized.

Based on previous activities and findings from the data analysis as well as public input, the priority needs in the City of Palm Coast include:

- Housing Assistance for Low-Moderate Income households,
- Public Improvements and Infrastructure,
- Public Services, and
- Economic Development

The City of Palm Coast will receive \$497,246 in Federal Fiscal Year (FFY) 2022. If funding levels are to stay flat, the City can expect to receive approximately \$2,486,230 over the five-year period covered by this Consolidated Action Plan.

The City of Palm Coast will be the lead agency on the implementation of CDBG activities with administrative and monitoring assistance from consultant(s). Currently, the City also administers public

service activities, but recent direction has led to the participation of non-profits in the implementation of public service activities.

SP-10 Geographic Priorities – 91.215 (a)(1)

Geographic Area

Table 46 - Geographic Priority Areas

General Allocation Priorities

Describe the basis for allocating investments geographically within the jurisdiction (or within the EMSA for HOPWA)

The City does not allocate CDBG funds on a geographic basis, there are no identifiable concentrated areas of poverty which may constitute justification for an area focus approach. However, the City may elect to invest CDBG funds on an areawide basis if there is an identifiable project within a qualified low-moderate income census tract. The City’s main strategy to expend CDBG funds is by providing direct assistance to low-moderate income persons. The City has not identified areas which may benefit or qualify as a Neighborhood Revitalization Strategy Area.

SP-25 Priority Needs - 91.215(a)(2)

Priority Needs

Table 47 – Priority Needs Summary

1	Priority Need Name	Housing Programs
	Priority Level	High
	Population	Extremely Low Low Moderate Large Families Families with Children Elderly Public Housing Residents Elderly Frail Elderly
	Geographic Areas Affected	
	Associated Goals	Provide Housing Assistance Maintain Compliance with CDBG Rules and Regulation
	Description	Maintain the supply and livability of affordable housing by providing assistance for rehabilitation of existing units.
	Basis for Relative Priority	The data in the needs assessment and market analysis indicate that there is a shortage of affordable housing units. Combined with an aging housing stock and a population that continues to be more elderly than the state average indicates the need to address the preservation of the existing units currently occupied by low-moderate income households.
2	Priority Need Name	Public Service
	Priority Level	High

	Population	Extremely Low Low Moderate Large Families Families with Children Elderly Public Housing Residents Rural Chronic Homelessness Individuals Families with Children Mentally Ill Chronic Substance Abuse veterans Persons with HIV/AIDS Victims of Domestic Violence Unaccompanied Youth Elderly Frail Elderly Persons with Mental Disabilities Persons with Physical Disabilities Persons with Developmental Disabilities Persons with Alcohol or Other Addictions Persons with HIV/AIDS and their Families Victims of Domestic Violence Non-housing Community Development
	Geographic Areas Affected	
	Associated Goals	Provide Public Service Assistance
	Description	Assist public service programs to expand capacity to serve additional eligible individuals.
	Basis for Relative Priority	A review of previous CDBG activities indicates an on-going need to provide and potentially expand public service activities offered to residents. Additional input into priorities came from through the consultation and public input process, as well as the advisory committee.
3	Priority Need Name	Public Infrastructure

	Priority Level	Low
	Population	Extremely Low Low Moderate Large Families Families with Children Elderly
	Geographic Areas Affected	
	Associated Goals	Create livable/sustainable neighborhoods through infrastructure investments.
	Description	Improve the safety and livability of neighborhoods through infrastructure projects that benefit all residents within a qualified low-moderate income census tract.
	Basis for Relative Priority	A review of previous CDBG activities, various City documents including the City's Capital Improvements Plan indicate opportunities may exist to advance infrastructure projects through CDBG funds.

Narrative (Optional)

SP-30 Influence of Market Conditions – 91.215 (b)

Influence of Market Conditions

Affordable Housing Type	Market Characteristics that will influence the use of funds available for housing type
Tenant Based Rental Assistance (TBRA)	The City does not fund TBRA.
TBRA for Non-Homeless Special Needs	The City does not fund TBRA for Non-homeless special needs.
New Unit Production	The City has historically supported the development of new units through the Low-Income Housing Tax Credit Program.
Rehabilitation	The City has historically used CDBG funds for rehabilitation of housing stock serving low-moderate income households. The City will continue to offer this program, however, as construction costs increase, the ability to serve all qualified applicants becomes more and more of a challenge. This may potentially be addressed by reducing the scope of work eligible for funding through the program (e.g. roofs only, ADA improvements only, etc.) Additionally, the City has an Interlocal Agreement with Flagler County for the administration of the State Housing Initiative Partnership (SHIP) program. This program further expands the assistance available to low-medium income households.
Acquisition, including preservation	The City does not include an activity to acquire existing housing units. Due to limited CDBG funds, purchase of a home or multi-family units is beyond the scope of the available funding.

Table 48 – Influence of Market Conditions

SP-35 Anticipated Resources - 91.215(a)(4), 91.220(c)(1,2)

Introduction

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	497,246	0	0	497,246	1,988,984	Remaining funds assume a flat allocation of \$497,246 for the 5-year period covered by the Consolidated Action Plan

Table 49 - Anticipated Resources

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

The CDBG program does not require a match from non-federal sources. Historically, the City has used in-house staff to provide administrative and planning functions for the CDBG program. Not all of staff time is charged to the CDBG program. Additionally, on past infrastructure projects, the City will use in-house staff to design and construct the project. CDBG funds are used to purchase construction materials only.

The City also coordinates with Flagler County on the state funded State Housing Initiatives Partnership (SHIP) program. The SHIP program is another funding source to address affordable housing needs through home-repair, home-ownership, or emergency funding activities.

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

The City does not anticipate to use publically owned land or property to address needs identified in the plan.

Discussion

SP-40 Institutional Delivery Structure – 91.215(k)

Explain the institutional structure through which the jurisdiction will carry out its consolidated plan including private industry, non-profit organizations, and public institutions.

Responsible Entity	Responsible Entity Type	Role	Geographic Area Served
City of Palm Coast	Government	Planning	
Flagler Cares	Non-profit organizations	Homelessness Non-homeless special needs Planning public services	Jurisdiction
Family Life Center	Non-profit organizations	Homelessness Non-homeless special needs public services	Jurisdiction
Flagler Free Clinic	Non-profit organizations	Non-homeless special needs public services	Jurisdiction
VOLUSIA FLAGLER HOMELESS COALITION	Continuum of care	Homelessness	Region

Table 50 - Institutional Delivery Structure

Assess of Strengths and Gaps in the Institutional Delivery System

The City of Palm Coast serves as the responsible entity for administering the CDBG program as well as activities funded by the CDBG program. Activities utilizing CDBG funds are incorporated into the everyday function of various departments/divisions within the City. Whether an activity is to be carried out by a consultant or a non-profit subrecipient, the City will serve as the responsible entity. Over the history of the City's administration of CDBG activities, the program has not been cited for deficiencies in monitoring or implementation.

The main gap in the delivery system has been the need for better coordination between the City and other social service providers. This gap in coordination typically stems from the limited capacity of the City to carry out social service activities. The City as typical for other municipal governments in the area depend on the County government for the provision of social services. This is mainly due to funding for social services funds being allocated to County governments.

Availability of services targeted to homeless persons and persons with HIV and mainstream services

Homelessness Prevention Services	Available in the Community	Targeted to Homeless	Targeted to People with HIV
Homelessness Prevention Services			
Counseling/Advocacy	X	X	
Legal Assistance	X	X	
Mortgage Assistance	X		
Rental Assistance	X		
Utilities Assistance	X		
Street Outreach Services			
Law Enforcement	X	X	
Mobile Clinics			
Other Street Outreach Services	X	X	
Supportive Services			
Alcohol & Drug Abuse	X	X	
Child Care			
Education	X	X	
Employment and Employment Training	X		
Healthcare	X		
HIV/AIDS	X		
Life Skills			
Mental Health Counseling	X	X	
Transportation	X	X	
Other			

Table 51 - Homeless Prevention Services Summary

Describe how the service delivery system including, but not limited to, the services listed above meet the needs of homeless persons (particularly chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth)

The Volusia/Flagler County Coalition for the Homeless (VFCCH) serves as the lead coordinating agency for the Continuum of Care services in Flagler County. As previously stated, the Coalition is composed of a number of agencies that offer varying services to serve the homeless as well as those at risk of homelessness.

Within Flagler County, Flagler Cares is a broad, county-wide initiative to expand the safety net for Flagler citizens in need, to build a coordinated system of social, financial and health services, and to decrease societal and personal costs by providing services as efficiently as possible. Flagler Cares provides outreach to homeless and at risk of homeless individuals and families and coordinates with the CoC through the Coordinated Entry process for linkage to Prevention, Rapid Rehousing and Permanent Supportive Housing solutions.

Describe the strengths and gaps of the service delivery system for special needs population and persons experiencing homelessness, including, but not limited to, the services listed above

There is a wide variety of services available through the CoC services offered by VFCCH. Despite the offering of different services, gaps will likely exist in the delivery system due to the location of where services are available. From previous narrative, services to assist the homeless, special needs, and other cohorts of the population may be readily available in the Volusia County area but not in Flagler/Palm Coast.

Provide a summary of the strategy for overcoming gaps in the institutional structure and service delivery system for carrying out a strategy to address priority needs

The following response is provided in the Volusia/Flagler County Coalition for the Homeless (VFCCH) Strategic Plan.

The VFCCH has implemented the full Coordinated Entry process through HUD CoC grant funding. The Coordinated Entry System has already seen several changes in design and implementation in its short tenure as a full operating system. Moving forward, it has become evident that the Coordinated Entry process most certainly will undergo further growth, experience changes, and mature into a fully functioning intake and referral system. The Systems Navigator role includes the facilitation and expansion of the Coordinated Entry System for Commission on Homeless and Housing COHH (FL-504 CoC). The Systems Navigator is responsible for developing protocols and targeted, evidence-based interventions, appropriate for the identified priority population. In addition, the Systems Navigator oversees the general operations of the Coordinated Entry system (including the development of additional resources) as well as train agency staff on the HMIS intake process, referral mechanism and the SPDAT prioritization tool. The System Navigator is also responsible for maintenance of a census of available units as facilitated by CoC funded, ESG funded and other participating agencies, maintain the prioritization list and may directly assist clients into availabilities as determined by priority.

The Coordinated Entry system covers the entire geographic area for the COHH (FL- 504 CoC) in which resources are spread out over a two-county area. Part of the overall Coordinated Entry effort entails partnering with existing programs and developing strategic collaborations within the two counties and throughout the multiple municipalities/communities that exist. Coordinated Entry is being enhanced by leveraging existing resources and aligning mainstream resources and existing systems.

To ensure that the entire service region of the COHH is covered by the system, the COHH will designate specific agencies to establish coordinated access points of entry in geographically relevant areas of the continuum (most of which have already been established; coordinated access points will be located in areas which have a high need for homeless services as indicated by the PIT Count). As befits a physically large and spread-out community, the COHH (FL 504 CoC) intends to establish several satellite Coordinated Entry points throughout the two-county region to meet the needs of Veterans, single adults, families and

unaccompanied youth. This process will most likely be augmented by the development of an outreach component (as funding becomes available) which will eventually be responsible for the identification, initial assessment and entry into the Coordinated Entry System for referral to appropriate housing interventions and services. In Flagler County, Flagler Cares is a Coordinated Entry point along with Flagler County Social Service.

SP-45 Goals Summary – 91.215(a)(4)

Goals Summary Information

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
1	Provide Housing Assistance	2022	2026	Affordable Housing		Housing Programs	CDBG: \$387,660	Homeowner Housing Rehabilitated: 8 Household Housing Unit
2	Provide Public Service Assistance	2022	2026	Non-Homeless Special Needs		Public Service	CDBG: \$74,586	Public service activities for Low/Moderate Income Housing Benefit: 125 Households Assisted
3	Maintain Compliance with CDBG Rules and Regulation	2022	2026	Monitoring compliance		Housing Programs Public Service	CDBG: \$35,000	Other: 1 Other

Table 52 – Goals Summary

Goal Descriptions

1	Goal Name	Provide Housing Assistance
	Goal Description	Financial assistance provided to rehabilitate existing housing units (owner-occupied rehabilitation).
2	Goal Name	Provide Public Service Assistance
	Goal Description	Through a grant program, provide funding to non-profits who provide a public service to residents of Palm Coast/Flagler County.

3	Goal Name	Maintain Compliance with CDBG Rules and Regulation
	Goal Description	Plan, Administer, and Monitor to ensure CDBG funded activities are in compliance with program rules.

Estimate the number of extremely low-income, low-income, and moderate-income families to whom the jurisdiction will provide affordable housing as defined by HOME 91.315(b)(2)

It is estimated that approximately 30 households/families (6/year) may be assisted through the City's proposed CDBG Housing Rehabilitation Activities.

SP-50 Public Housing Accessibility and Involvement – 91.215(c)

Need to Increase the Number of Accessible Units (if Required by a Section 504 Voluntary Compliance Agreement)

There are currently no public housing units managed by a Housing Authority within the City of Palm Coast.

Activities to Increase Resident Involvements

There are currently no public housing units managed by a Housing Authority within the City of Palm Coast.

Is the public housing agency designated as troubled under 24 CFR part 902?

N/A

Plan to remove the ‘troubled’ designation

There are currently no public housing units managed by a Housing Authority within the City of Palm Coast.

SP-55 Barriers to affordable housing – 91.215(h)

Barriers to Affordable Housing

The City of Palm Coast is committed to creating safe, diverse, and affordable housing to all its residents. The primary goal of this commitment is to promote the City as a desirable and sustainable place to live, work, and play.

In 2022, the City in conjunction with Flagler County reviewed affordable housing incentives provided as part of the State Housing Initiatives Partnership (SHIP) program. The SHIP program relies on state funds to fund various affordable housing activities such as rehabilitation, homebuyer assistance, and new construction assistance.

The review of the incentives resulted in the revision of some incentives to clarify and make the incentives more useful for developers of affordable housing. Incentives for affordable housing such as increased densities, flexibility in infrastructure design (roads), lot sizes, setbacks, or other development standards are provided and available through the Master Planned Development review process.

It is important to note that these incentives are provided due to the recognition that the more rigid standard of a conventional zoning district such as minimum lot size, minimum home size, and minimum setbacks can limit the affordability of a housing unit.

Finally, as part of the incentives review, it is important to note that an on-going review of ordinances and policies and their impact on affordable housing will be part of the proposed legislation's analysis.

Strategy to Remove or Ameliorate the Barriers to Affordable Housing

The strategy to remove or ameliorate the barriers to affordable housing is to provide the opportunities to diversify the housing supply. Diversification of housing supply not only comes with an increase in the amount of rental units in the city, but also through the diversification of lot sizes for single-family residential development. Smaller lot sizes can serve as a way of addressing the need for “starter” homes.

SP-60 Homelessness Strategy – 91.215(d)

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

As previously stated, the City recognizes its limitation in being able to provide meaningful assistance to the homeless population and assessing their individual needs. The City has consulted with the Executive Director for the Volusia/Flagler County Coalition for the Homeless (VFCCH) in order to provide a response to the questions posed in this section of the Consolidated Action Plan. The City reviewed the VFCCH's strategic plan and as appropriate will consider assistance to organizations that address the needs of the homeless. This assistance will likely come in the form of making CDBG funds available through the public service mini-grant program.

Addressing the emergency and transitional housing needs of homeless persons

As previously stated, the City recognizes its limitation in being able to provide meaningful assistance to the homeless population and addressing the emergency shelter and transitional housing needs of homeless persons. The City has consulted with the Executive Director for the Volusia/Flagler County Coalition for the Homeless (VFCCH) in order to provide a response to the questions posed in this section of the Consolidated Action Plan. The City reviewed the VFCCH's strategic plan and as appropriate will consider assistance to organizations that address the needs of the homeless. This assistance will likely come in the form of making CDBG funds available through the public service mini-grant program.

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.

See response above.

Help low-income individuals and families avoid becoming homeless, especially extremely low-income individuals and families who are likely to become homeless after being discharged from a publicly funded institution or system of care, or who are receiving assistance from public and private agencies that address housing, health, social services, employment, education or youth needs

See response above.

SP-65 Lead based paint Hazards – 91.215(i)

Actions to address LBP hazards and increase access to housing without LBP hazards

Based on the 2016-2020 ACS, there are 3,360 units built before 1980. These units carry the risk of lead-based paint hazard. Actions to address Lead Based Paint (LBP) Hazards are specified in the Local Housing Assistance Plan for the CDBG program, the following process controls activities related to lead-based paint hazards:

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

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

How are the actions listed above related to the extent of lead poisoning and hazards?

The actions described above are intended to address hazards from lead based paint. The City's housing program does not strictly target homes for abatement. Homes that receive financial assistance through the CDBG program are subject to the rules stated above.

How are the actions listed above integrated into housing policies and procedures?

As previously stated, homes who met the criteria described above are subject to the actions stated in the Local Housing Assistance Plan (LHAP), which serves as the program rules and guidelines for the City's CDBG program.

SP-70 Anti-Poverty Strategy – 91.215(j)

Jurisdiction Goals, Programs and Policies for reducing the number of Poverty-Level Families

The City recognizes the limitations available to provide technical assistance or financial assistance to address poverty within the context of this Consolidated Action Plan. However, it should be noted that an overarching goal of this plan would be to benefit the greatest number of people to the greatest extent possible with the available resources.

The City will coordinate with various providers whose actions have been identified as the most beneficial to residents and to assisting families in need. As stated above, through the CDBG program, a City should consider technical and potentially financial assistance to agencies that provide public services to address the needs of persons in poverty. These agencies may typically provide services to homeless and non-homeless special needs populations, as well as low- and moderate-income families. These services may include housing, job/skills training and other assistance to promote self-sufficiency.

In light of the statement provided above, the City through its CDBG program does provide assistance to assist households below the low/moderate income threshold and or take the first step to building self-sufficiency. These activities include:

- Providing a summer camp scholarship program that assists low-moderate income students/households, and
- Providing financial assistance to low-moderate income families to purchase a home.

How are the Jurisdiction poverty reducing goals, programs, and policies coordinated with this affordable housing plan?

See response above.

SP-80 Monitoring – 91.230

Describe the standards and procedures that the jurisdiction will use to monitor activities carried out in furtherance of the plan and will use to ensure long-term compliance with requirements of the programs involved, including minority business outreach and the comprehensive planning requirements

The City of Palm Coast staff with the assistance of a consultant firm monitors all contracts on an ongoing basis. The consultant firm is typically responsible for the contract compliance of contractors associated with the housing rehabilitation program and will be responsible for monitoring program compliance for subrecipients of public service grants. Contracts for HUD-funded projects are reviewed to ensure compliance with program requirements (both City and HUD requirements). Additionally, through the Environmental Review Requirements associated with CDBG activities, staff reviews an activity for consistency with this Consolidated Action Plan, as well as the City's Comprehensive Plan.

Monitoring is an ongoing process involving continuous communication and evaluation. The process involves frequent telephone/email contact, and analysis of reports and inspections. Consultant staff must comprehend the scope of work for rehabilitation work to ensure compliance with program requirements and the possible need for technical assistance.

As part of this process, the Consultant alerts staff to fraud, waste, mismanagement or situations with the potential of abuse. Monitoring also provides opportunities to identify program participant accomplishments as well as successful techniques that other contractors could model.

Expected Resources

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

Introduction

The City of Palm Coast will receive an allocation of \$497,246 in CDBG funds from HUD in FFY 2022. The City does not expect to receive any program income. However, any program income received during the fiscal year will be allocated to the housing rehabilitation activity. The City anticipates to receive approximately the same amount of funds per year for the remainder of the Consolidated Plan year (FFY 2023-2026).

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	497,246	0	0	497,246	1,988,984	Remaining funds assume a flat allocation of \$497,246 for the 5-year period covered by the Consolidated Action Plan

Table 53 - Expected Resources – Priority Table

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

matching requirements will be satisfied

The CDBG program does not require a match from non-federal sources. Historically, the City has used in-house staff to provide administrative and planning functions for the CDBG program. Not all of staff time is charged to the CDBG program. Additionally, on past infrastructure projects, the City will use in-house staff to design and construct the project. CDBG funds are used to purchase construction materials only.

The City also coordinates with Flagler County on the state funded State Housing Initiatives Partnership (SHIP) program. The SHIP program is another funding source to address affordable housing needs through home-repair, home-ownership, or emergency funding activities.

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

The City does not anticipate to use publically owned land or property to address needs identified in the plan.

Annual Goals and Objectives

AP-20 Annual Goals and Objectives

Goals Summary Information

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
1	Provide Housing Assistance	2022	2026	Affordable Housing		Housing Programs	CDBG: \$387,660	Homeowner Housing Rehabilitated: 8 Household Housing Unit
2	Provide Public Service Assistance	2022	2026	Homeless Non-Homeless Special Needs		Public Service	CDBG: \$74,586	Public service activities other than Low/Moderate Income Housing Benefit: 125 Persons Assisted
3	Maintain Program	2022	2026	Planning and Monitoring			CDBG: \$35,000	Maintain consistency of program with Federal program rules and requirements

Table 54 – Goals Summary

Goal Descriptions

1	Goal Name	Provide Housing Assistance
	Goal Description	Qualified households will receive financial assistance to preserve the affordable housing stock in the City. Additionally, housing assistance can prevent homelessness by maintaining the housing stock in a livable condition. This activity is carried out on a citywide basis to benefit low-moderate income households.

2	Goal Name	Provide Public Service Assistance
	Goal Description	Public Service activities are intended to provide assistance to allow low-moderate income persons necessary to maintain livability and sustainability. The provision of these public services could assist persons/families to continue to afford other basic necessities such as housing, transportation, or utilities.
3	Goal Name	Maintain Compliance with CDBG Rules and Regulation
	Goal Description	Properly maintain documentation to ensure that beneficiaries of the CDBG program are eligible and that all activities meet the CDBG program's national objective.

Projects

AP-35 Projects – 91.220(d)

Introduction

The City of Palm Coast intends to carry-out activities which are consistent with previous activities funded by the CDBG program. Specifically, these projects include: owner-occupied housing rehabilitation, the summer camp scholarships, grant program for non-profit organizations, and general planning, administration, and monitoring. CDBG funds have also been used previously on infrastructure projects and a first-time homebuyers program. Although not funded within the upcoming year. These activities may again be funded when the need arises.

Projects

#	Project Name
1	Housing Rehabilitation (Single Family)
2	First Time Homebuyer Assistance
3	Youth recreational activities (emphasize assistance to include programs that serve teens)
4	Public Service Mini-grant program
5	General Planning, Administration, and Monitoring of CDBG Programs

Table 55 – Project Information

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

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

The following are identified as obstacles to meeting underserved needs:

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

neighborhoods.

AP-38 Project Summary
Project Summary Information

1	Project Name	Housing Rehabilitation (Single Family)
	Target Area	
	Goals Supported	Provide Housing Assistance
	Needs Addressed	Housing Programs
	Funding	CDBG: \$397,660
	Description	Financial assistance to assist low/moderate income households with rehabilitation of existing single-family residential units. Rehabilitation will be to address health and safety issues as well as to bring dwelling unit up to current building code.
	Target Date	9/30/2023
	Estimate the number and type of families that will benefit from the proposed activities	It is estimated that 8 families may be assisted. Estimate is based on maximum award of \$50,000/dwelling unit.
	Location Description	The activity may occur anywhere within the incorporated limits of Palm Coast.
2	Planned Activities	<p>To implement this activity, the program initiates an application cycle. The application cycle includes an informational workshop for all potential applicants, and income review for all applicants.</p> <p>After income review, the City's Housing Rehabilitation Specialist (HRS) schedules a walk-through of a qualified applicant's home in order to develop a scope of work.</p> <p>After completion of scope of work, the homeowner and HRS review the scope and agree on the final scope of work.</p> <p>The scope of work is issued by the City's procurement office for a competitive bid.</p> <p>All bids received are reviewed and a contract is signed with the low-bidder (with agreement from the homeowner).</p> <p>Construction activities ensues after contract is issued for the contractor.</p>
	Project Name	First Time Homebuyer Assistance
	Target Area	
	Goals Supported	Provide Housing Assistance
	Needs Addressed	Housing Programs
	Funding	:

	Description	Financial assistance to low/moderate income households to purchase a new home. Assistance will be available to cover down-payment or closing costs.
	Target Date	9/30/2023
	Estimate the number and type of families that will benefit from the proposed activities	
	Location Description	Homes within the incorporated boundaries of Palm Coast are eligible for purchase under this activity.
	Planned Activities	
3	Project Name	Youth recreational activities
	Target Area	
	Goals Supported	Provide Public Service Assistance
	Needs Addressed	Public Service
	Funding	CDBG: \$40,000
	Description	Financial assistance is provided to assist students from low/moderate income families to participate in the City's various recreation activities, including summer camp, swim or golf lessons.
	Target Date	9/30/2023
	Estimate the number and type of families that will benefit from the proposed activities	It is estimated that approximately 67 families will be assisted through the program based on an average of \$600 of assistance/student.
	Location Description	Activities will mainly occur at one the City's recreational amenities, such as the community center, the aquatic center, or golf course.
4	Planned Activities	
	Project Name	Public Service Mini-grant program
	Target Area	Emphasis on programs serving teens
	Goals Supported	Provide Public Service Assistance
	Needs Addressed	Public Service
	Funding	CDBG: \$34,586

	Description	This activity is made available to non-profit organizations. The available funding may be used for activities to serve the homeless, victims of domestic violence, at-risk teens, or for activities to prevent homelessness.
	Target Date	9/30/2023
	Estimate the number and type of families that will benefit from the proposed activities	It is estimated that 58 families may be assisted based on an average of \$600 of assistance/family. These families may be from different demographic characteristics but will need to be below the low/moderate income threshold or will need to be in one of the presumed benefit categories such as victims of domestic violence, severely disabled adults, homeless persons, illiterate adults, persons with AIDS, and migrant farm workers.
	Location Description	There is no specific address where programs will be offered, however, the principal beneficiaries will be residents of Palm Coast.
	Planned Activities	Planned activities will include a grant cycle that announces the availability of funding. The announcement is followed by completion of grant applications which is reviewed for eligibility by the City consultant. Recipients enter into a sub-recipient agreement with the City and activities may then begin.
5	Project Name	General Planning, Administration, and Monitoring of CDBG Programs
	Target Area	
	Goals Supported	Maintain Compliance with CDBG Rules and Regulation
	Needs Addressed	Housing Programs Public Service Public Infrastructure
	Funding	CDBG: \$25,000
	Description	Continuous planning, administration, and monitoring of the CDBG program to ensure compliance with program rules.
	Target Date	9/30/2023
	Estimate the number and type of families that will benefit from the proposed activities	This activity is to ensure that City continues to remain in compliance with CDBG rules and regulations and continue to receive full appropriation of the block grant available to the City.
	Location Description	Planning, administration, and monitoring activities typically will occur in City Hall. However, to monitor sub-recipients, City staff and City's grant consultant if necessary, will conduct field visits to sub-recipient offices.

	Planned Activities	
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AP-50 Geographic Distribution – 91.220(f)

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

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

Geographic Distribution

Target Area	Percentage of Funds
N/A	

Table 56 - Geographic Distribution

Rationale for the priorities for allocating investments geographically

The City has not created a priority for allocating investments geographically in a specific area of the City. The housing program to be funded with CDBG funds will be available Citywide and will be available to benefit low-moderate income households. As described above, the City may target funds for an infrastructure project within a Low-Moderate Income census tract if the opportunity arises.

Discussion

See above.

Affordable Housing

AP-55 Affordable Housing – 91.220(g)

Introduction

One Year Goals for the Number of Households to be Supported	
Homeless	0
Non-Homeless	8
Special-Needs	0
Total	8

Table 57 - 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	8
Acquisition of Existing Units	0
Total	8

Table 58 - One Year Goals for Affordable Housing by Support Type

Discussion

Through the housing rehabilitation activity, the CDBG program will provide assistance to bring existing owner-occupied housing units to current code and address existing health and safety issues. The projected number of assistance is based on the assistance maximum of \$50,000/housing unit.

AP-60 Public Housing – 91.220(h)

Introduction

There are currently no public housing units managed by a Housing Authority within the City of Palm Coast.

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

There are currently no public housing units managed by a Housing Authority within the City of Palm Coast.

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

There are currently no public housing units managed by a Housing Authority within the City of Palm Coast.

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

There are currently no public housing units managed by a Housing Authority within the City of Palm Coast.

Discussion

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

Introduction

Due to limited funding availability and staff, the City does not directly provide services to address the homeless and other special needs activities. However, the City is committed to coordinating and consulting with the efforts of the area Continuum of Care (Volusia-Flagler Coalition for the Homeless) and other social service agencies who provide assistance to the homeless and special needs population.

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

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

As previously stated, the City does not provide direct outreach to the homeless population. As reported in the VFCCH 2021 Gaps and Needs Assessment Report, direct street outreach is facilitated by the Volusia Flagler County Coalition for the Homeless, Inc., SMA Healthcare's PATH Outreach program, Changing Homelessness SSVF (Supportive Services for Veteran Families) program, the VA (Veterans Administration), The Neighborhood Center of West Volusia and Flagler Cares.

Flagler Cares is a broad, county-wide initiative to expand the safety net for Flagler citizens in need, to build a coordinated system of social, financial and health services, and to decrease societal and personal costs by providing services as efficiently as possible. Flagler Cares provides outreach to homeless and at risk of homeless individuals and families and coordinates with the CoC through the Coordinated Entry process for linkage to Prevention, Rapid Rehousing and Permanent Supportive Housing solutions.

Addressing the emergency shelter and transitional housing needs of homeless persons

As previously stated, due to limited funding and institutional capacity, the City does not intend to carry out activities directly to provide emergency shelter and transitional housing needs of homeless persons. However, the City is committed to coordinating and consulting with agencies that provide a direct response to addressing the needs of the homeless population.

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

As previously stated, due to limited funding and institutional capacity, the City does not intend to carry

out activities to address homeless programs that provide assistance for households that make the transition to permanent housing and independent living. However, the City is committed to coordinating and consulting with agencies that provide a direct response to addressing the needs of the homeless population.

The City acknowledges that the VFCCH and its local partner, Flagler Cares, have resources available as well as an organizational structure that is ready to respond and provide assistance to the address needs of the homeless population.

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

See response to previous item.

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

Introduction:

The City of Palm Coast is committed to creating safe, diverse, and affordable housing to all its residents. The primary goal of this commitment is to promote the City as a desirable and sustainable place to live, work, and play.

As discussed through this document and within the recently completed Assessment of Fair Housing, the lack of a diverse housing supply is a challenge that can directly impact the availability of affordable housing. The low supply of rental housing presents a challenge for households to have a housing choice.

As provided in data in this report, 78.5% of renter households earning less than 80% of Area Median Income (AMI) are cost-burdened compared to 47% of all renter households. Similarly, 52.4% of owner households earning less than 80% of AMI are cost burdened compared to all owner households (25% cost burdened).

The data provided also indicates that renter-households are more impacted by affordability than owner households.

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

In 2022, the City in conjunction with Flagler County reviewed affordable housing incentives provided as part of the State Housing Initiatives Partnership (SHIP) program. The SHIP program relies on state funds to fund various affordable housing activities such as rehabilitation, homebuyer assistance, and new construction assistance.

The review of the incentives resulted in the revision of some incentives to clarify and make the incentives more useful for developers of affordable housing. Incentives for affordable housing such as increased densities, flexibility in infrastructure design (roads), lot sizes, setbacks, or other development standards are provided and available through the Master Planned Development review process.

It is important to note that these incentives are provided due to the recognition that the more rigid standard of a conventional zoning district such as minimum lot size, minimum home size, and minimum setbacks can limit the affordability of a housing unit.

Finally, as part of the incentives review, an on-going analysis of proposed ordinances and policies and their impact on affordable housing will be part of the proposed legislation's analysis and presented to

decision-makers prior to final action on a proposed ordinance or policy.

AP-85 Other Actions – 91.220(k)

Introduction:

In recognition of the City's limited capacity to provide assistance for social service activities, the City seeks to partner with and support existing agencies to provide the assistance needed by segments of the population not covered by direct City activities. The City will consider the use of CDBG or other available funds to assist social service providers to implement activities. Additionally, the City as appropriate will coordinate with social service agencies through on-going data exchange or consultation.

Actions planned to address obstacles to meeting underserved needs

As stated throughout this document, the City recognizes its limitations in addressing the underserved needs within the community. The primary obstacle to meeting underserved needs is sufficient resources to meet the needs identified in the outreach conducted for this Action Plan. Addressing all housing, homeless, and community developments needs is a difficult task due to lack of funding. The City will utilize all possible resources and will attempt to secure additional sources of financing as appropriate over the course of the program year to meet underserved needs. These actions are done with full recognition that the Flagler County Social Service Dept. is the main governmental source of providing social services, and that other agencies such as Flagler Cares and Family Life Center provide vital services in the community that are not provide by a local governmental agency.

Over the timeframe covered by this Consolidated Plan and Annual Action Plan, the following actions will take place in an effort to address obstacles to meeting the underserved needs:

- Continue to develop and nurture relationships with stakeholders (social service providers, clients) in an effort to better identify needs.
- Enhance the level of coordination among stakeholders to maximize outputs and deliver more efficient and effective services. For the City, this can be as simple as directing a resident/citizen to an agency who may be able to help address their need.

Actions planned to foster and maintain affordable housing

The City will foster and maintain affordable housing through the use of its CDBG funds by continuing to implement the Housing Rehabilitation Program, and the first-time homebuyers program. The City has limited resources to implement other affordable housing activities, but other opportunities are available through the State Housing Initiatives Partnership (SHIP) program which is administered and managed by Flagler County. Other assistance available through the SHIP program include: Roof Replacement, Barrier

Free Modification for Seniors, and Disaster Assistance.

Actions planned to reduce lead-based paint hazards

As part of the Housing Rehabilitation Program, the City implements testing to ensure that CDBG program assisted housing rehabilitation activities undergo a lead paint assessment when appropriate based upon the age of the structure. If lead paint is detected, the City undertakes all required measures to mitigate and/or remove lead-based paint where it exists. The City procures certified providers of lead paint testing, abatement and clearance testing.

The City will continue to test all houses built prior to 1978 if rehabilitated under the owner-occupied rehabilitation program for lead-based paint and, if lead-based paint is found, the City will incorporate the necessary mitigation work into the rehabilitation work and clearance tests to indicate the home is safe before allowing homeowner to occupy the home.

Actions planned to reduce the number of poverty-level families

As previously stated, the City recognizes the limitations available to provide technical assistance or financial assistance to address poverty within the context of this Consolidated Action Plan. However, it should be noted that an overarching goal of this plan would be to benefit the greatest number of people to the greatest extent possible with the available resources.

The City will coordinate with various providers whose actions have been identified as the most beneficial to residents and to assisting families in need. As stated above, through the CDBG program, a City should consider technical and potentially financial assistance to agencies that provide public services to address the needs of persons in poverty. These agencies may typically provide services to homeless and non-homeless special needs populations, as well as low- and moderate-income families. These services may include housing, job/skills training and other assistance to promote self-sufficiency.

In light of the statement provided above, the City through its CDBG program does provide assistance to assist households below the low/moderate income threshold and or take the first step to building self-sufficiency. These activities include:

- Providing a summer camp scholarship program that assists low-moderate income students/households, and
- Providing financial assistance to low-moderate income families to purchase a home.

Actions planned to develop institutional structure

The City of Palm Coast Community Development Department serves as the lead entity in carrying out the Consolidated Plan along with the assistance of consultants. Other activities completed in the past using

CDBG funds have included assistance from the City's Public Works Dept., Engineering Dept. The City has developed sufficient capabilities for implementing and administering programs in house and continues to foster agency coordination. The City recognizes that collaboration between local, county, and non-profit agencies is important in successfully carrying out the goals and objectives identified in the Consolidated Plan and addressing community needs.

The City recognizes that continuing to build a structured service delivery systems is critical to the long-term success of community development efforts in the City. These systems assist in proper targeting of resources, efficient use of those resources, and meaningful change in the number of poverty-level families in the City. The City of Palm Coast will continue to engage in coordination efforts between governmental and non-governmental agencies operating within the City, and continued support for institutional efforts to address long-term challenges in the region.

Although a range of services are available in the community, including homelessness prevention services, health services, crime-victim assistance and supportive services, there is recognition that the demand is always greater than the assistance available. These programs are provided by nonprofit organizations and Continuum of Care (CoC) member agencies.

Therefore, the City will support the following steps to develop institutional structure:

- Participate in training opportunities available to City staff
- Provide technical assistance when staff has the capacity to do so
- Provide financial assistance, as appropriate or when available.

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

The City is committed to ensuring that there is coordination between public and private housing and social service agencies. The Community Development Department as the lead administrator for the CDBG Block Grant is essential to ensure that on-going coordination and opportunities for cooperation are not missed.

The City will:

- Continue coordination with the County on available housing program (SHIP and CDBG), and
- Continue coordination with service agencies such as the Volusia-Flagler Coalition for the Homeless, Flagler Cares, Family Life Center, or other service agency during the formulation of the CDBG Annual Action Plan, and the Big Bend Continuum of Care in the regular network meetings.

The coordination efforts above are in recognition that these agencies play a key role in delivering services to the public and providing programs essential to the community such as homeless services, youth programs, elderly programs, and special needs services. Additionally, these agencies provide a partnership

opportunities for the use of CDBG funds for public service activities.

Program Specific Requirements

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

Introduction:

The activities identified in the FFY 2022 Action Plan are consistent with activities carried out in previous CDBG program years. The City does not anticipate any program income at this time. Should program income become available, such income will be used to implement the housing activities identified in this Action Plan. Additionally, program income from the Neighborhood Stabilization Program (NSP) are to be administered as part of the CDBG program. Should any income from the NSP program come to the CDBG program it will be allocated to housing activities funded by the CDBG program.

Community Development Block Grant Program (CDBG)

Reference 24 CFR 91.220(I)(1)

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

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

Other CDBG Requirements

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

The City has not identified any specific funds to fund urgent need activities, however, the City consistent with CDBG National Objectives, may use funds for urgent need activities as needed based on a declared emergency.