

City of Miami Gardens



Department of
Community Development



**Thirteenth Program Year
Action Plan**

**FY 2018-
2019**

Submitted to:

The US Department of Housing & Urban Development
Community Planning & Development
909 SE First Avenue, Suite 500
Miami, Florida 33131-3028



Thirteenth Program Year Action Plan

The CPMP Tenth Annual Action Plan includes the [SF 424](#) and Narrative Responses to Action Plan questions that CDBG, HOME, HOPWA, and ESG grantees must respond to each year in order to be compliant with the Consolidated Planning Regulations. The Executive Summary narratives are optional.

Narrative Responses

GENERAL

Executive Summary

Program Year 13 Action Plan Executive Summary:

The of *The Executive Summary is required. Include the objectives and outcomes identified in the plan and an evaluation of past performance.*

Program Year 13 Action Plan for the City Miami Gardens covers the period beginning October 1, 2018 through September 30, 2019. As in previous years,

the programs and activities described in this 10th Year Action Plan are developed with three primary objectives, 1) providing benefits to low- and moderate-income individuals, and households, 2) providing benefits to neighborhoods with high concentrations of low- and moderate-income residents, and 3) benefits to the City as a whole. The City will also use the plan to coordinate its efforts with other federal, state, and local grant programs to produce decent housing, a suitable living environment and increase economic opportunities in the community.

The City intends to fully utilize its Program Year 13 allocation of \$1,095,994 to address the priority needs identified in the 2016-2021 Consolidated Plan.

Introduction

Miami Gardens is a distinctive suburban City in Miami-Dade County. Incorporated in 2003, Miami Gardens is the largest predominantly African-American municipality in the state of Florida, with a solid working-class and middle-class resident base and a strong sense of community ownership and civic pride. The City has a sufficiently large population to be recognized as an “entitlement community” by the U.S. Department of Housing and Urban Development (HUD), meaning that it automatically receives annual HUD Community Planning & Development (CPD) grant funds according to a population-based formula. Currently, the only CPD program from which Miami Gardens receives funding is the Community Development Block

Grant (CDBG). This Annual Action Plan for the 2018 program year meets HUD's requirements for CPD grantees, identifying goals and objectives for the use of CPD funds based on public input and an analysis of housing and community development needs and resources.

Summarize the objectives and outcomes identified in the Plan

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

The City of Miami Gardens has developed its Action Plan based on an analysis of the data presented in this plan and the community participation and stakeholder consultation process. Through these efforts, the City has identified five priority needs and five goals to address those needs.

The priority needs include: 1) Improved Public Facilities and Infrastructure, 2) Expanded Public Service Offerings, 3) Increased Affordable Housing Options, 4) Expanded Economic Development Opportunities, and 5) Improved Efforts to End Homelessness.

To provide for those needs, the five goals are as follows:

1. Improve and Expand Public Infrastructure
2. Increase Capacity of Area Service Providers
3. Preserve Existing Housing Stock
4. Provide for New Affordable Housing Opportunities
5. Improve and Expand Economic Development Activity
3. Evaluation of past performance

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

The City of Miami Gardens became eligible to receive HUD CPD funds in 2006. With other public, private and non-profit community housing providers and non-housing service agencies, the City has made significant contributions to provide safe, decent and affordable housing, a suitable living environment, and economic opportunities especially for low- to moderate-income individuals in the community. However, affordable housing, creating a suitable living environment and economic development remain some of the most prolific issues facing Miami Gardens, as documented by the current Consolidated Plan and the 2016 Consolidated Annual Performance and Evaluation Report (CAPER).

The Consolidated Plan is a comprehensive document that describes the City's housing market conditions, identifies the need for affordable housing and community development, and provides strategies to address the needs over a five-year period. The CAPER provides an assessment of progress towards the five-year goals and the one-year goals of HUD entitlement grant CDBG.

Summary from citizen participation section of plan.

The City of Miami Gardens consulted with community service providers, other jurisdictions, and other entities for housing and non-housing community development issues. The City published newspaper advertisements in the Miami Herald where individuals and organizations were invited to attend several public meetings, a 30-day public comment period and public hearings.

Citizen Participation Efforts for the 2018 AAP:

Residents had an opportunity to provide comments on the proposed plan at the two public meetings held on Monday, May 21, 2018 at the Miami Gardens City Hall, Community Room at 10:00 am and 5:30 pm. The City made a Notice of Funding Availability Request for Proposals for Public Services activities in Miami Gardens on April 11, 2018. Local agencies and non-profits were invited to apply.

A 30-day public comment period for the Annual Action Plan was sent to the local paper on June 20th and the comment period was to open on Sunday, June 24, 2018 to Thursday, July 26, 2018.

A public hearing was held on July 11, 2018 for the approval of the 2018 Annual Action Plan by City Council.

Summary of public comments

This could be a brief narrative summary or reference an attached document from the Citizen Participation section of the Con Plan.

Public Hearing on July 11, 2018

There were three comments made at the Public Hearing on July 11, 2018. One comment was not accepted because it was not related to the Annual Action Plan. One comment from the public asked to clarify the report, and the understanding of those in attendance of the report. Another comment from the public asked that a copy of the presentation was provided to the public for all future presentations relating to the CDBG grant. The Community Development Director highlighted the funding allocations and staff recommendations concerning the Annual Action Plan.

30-Day Public Comment Period from June 24, 2018 to July 26, 2018

There were no comments made.

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

One comments was made during the Public Hearing on July 11, 2018, however the comment was not accepted because it was not related to the Annual Action Plan.

All other comments were accepted.

7. Summary

The following 2018 Annual Action Plan is the third year of the City's 2016-2020 Consolidated Plan.

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

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

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

Agency Role	Name	Department/Agency
CDBG Administrator	MIAMI GARDENS	Community Development Department

Table 1 – Responsible Agencies

Narrative (optional)

The City of Miami Gardens Community Development Department is the responsible entity for carrying out the day-to-day administration of the housing and community development programs. The staff works with City Departments, local nonprofit and for-profit organizations, and contractors to carry out the goals of the Action Plan.

Consolidated Plan Public Contact Information

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

1. Introduction

To comply with the Action Plan development process, federal regulations (24 CFR 91.200(b), 91.215(i)), the City of Miami Gardens consulted with community service providers, other jurisdictions, and other entities with a potential interest in or knowledge of the jurisdiction's housing and non-housing community development issues. The City reached out through its website, Facebook and e-mails; held stakeholder meetings and citizen participation meetings; distributed paper flyers; and placed a newspaper advertisement in the Miami Herald. Individuals and organizations were invited to attend the stakeholder meetings and public meetings. This provided every stakeholder, interested party and resident with the opportunity to provide feedback.

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

In the development of this Plan, the City of Miami Gardens consulted with public and assisted housing providers, as well as private and governmental health, mental health and social service agencies. The first step in the consultation process was the identification of stakeholders and citizens that would participate in the citizen participation/consultation process. Once the agencies and organizations were identified, they received invitations to stakeholder meetings and citizen participation meetings. In addition to these direct invitations, a notice was placed in the Miami Herald and on the City's website. The meetings were also published on the City's Event Calendar, the Mayor and City Council were notified, and departments within the City were notified. By using these methods to seek public comment and participation, the City was able to reach out to:

- Public and private agencies that provide health services and social and fair housing services;
- State and local health and child welfare agencies in regard to the portion of its plan concerning lead-based paint hazards;
- Adjacent local governments and local government agencies with metropolitan-wide planning responsibilities;
- Public and private agencies that address the needs of persons with HIV/AIDS and their families;
- The County public housing agency concerning public housing needs, planned programs, and activities; and
- Local businesses and industry to determine the needs of these organizations in better planning the funds for economic development 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.

In July 1993, Miami-Dade County's governing body, the Board of County Commissioners (the BCC), adopted a Continuum of Care plan entitled the "Miami-Dade County Community Homeless Plan" (the Plan). Concurrent with the adoption of the Plan, the BCC approved the levying of a one cent food and beverage tax to provide a unique, local dedicated source of funding for homeless programs, and approved the creation of the 27-member Miami-Dade County Homeless Trust (the Trust) to administer the proceeds of this tax and implement the Plan. The Trust is the overall coordinating body for the continuum of care.

Additional partners in the implementation of the Plan include the Miami-Dade Public Housing and Community Development Agency, which administers public housing and community development in the county, the local homeless provider consortia, and the Trust's private-sector partner, with its own diverse 65-member board. Services and housing are accessed through a coordinated, county-wide outreach process and connected through a homeless management information system (HMIS).

Within the Miami Gardens city limits, the only facility serving homeless populations is Del Prado Gardens, a permanent supportive housing development owned by Carrfour Supportive Housing, a Miami-based nonprofit developer. However, Miami Gardens is in the service area of several nearby homeless service and mainstream service providers, including Citrus Health Network and Jackson Memorial Hospital. Both of these organizations follow the Continuum of Care's Coordinated Outreach, Assessment and Placement (COAP) policy. Under the COAP policy, outreach workers administer a VI-SPDAT to assess vulnerability. VI-SPDAT stands for Vulnerability Index - Service Prioritization Decision Assistance Tool, which is a survey administers to individuals and families to determine the risk and prioritization when providing assistance to persons/families whom are either homeless or at-risk of homelessness. Individuals and families with high vulnerability scores are referred to the permanent supportive housing waiting list, while those with intermediate scores are referred for rapid re-housing. Veterans Affairs outreach workers refer clients to HUD-Veterans Affairs Supportive Housing (VASH), Support Services for Veteran Families, or Grant and Per Diem programs as appropriate. A main access point for the COAP system is a centralized Homeless Helpline for persons to call to request assistance. Persons in the City of Miami Gardens in need of prevention or rapid-rehousing are directed to their closest location in Hialeah to apply for assistance.

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

Miami Gardens does not receive ESG funds, but City staff attend Continuum of Care subcommittee meetings held by the Miami-Dade County Homeless Trust. The Homeless Trust

has developed performance standards for coordinated intake and assessment, adopting housing first core concepts, implementing housing first standards, and establishing core components for rapid re-housing and procedures for HMIS administration.

In 2009, the City of Miami Gardens joined Miami, North Miami, and Miami-Dade County in contributing Homelessness Prevention and Rapid Re-Housing Program (HPRP) funds for the creation of the Housing Assistance Network of Dade (HAND), to be operated by Citrus Health Network. HPRP was a time-limited HUD funding program designed as a response to the Recession, and is no longer available.

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

Table 2 – Agencies, groups, organizations who participated

1	Agency/Group/Organization	Citrus Health Network INC
	Agency/Group/Organization Type	Housing Services-Children Services-Elderly Persons Services-Persons with Disabilities Services-Persons with HIV/AIDS Services-Victims of Domestic Violence Services-homeless Services-Health Services - Victims
	What section of the Plan was addressed by Consultation?	Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Homelessness Strategy Non-Homeless Special Needs
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	The City of Miami Gardens maintains open lines of communication with this organization and the input was taken into consideration when addressing program needs. Citrus Health Network (CHN) is the lead agency in the Housing Assistance Network of Dade (HAND) Program, a multi-agency partnership with Miami-Dade County and local municipalities making an effort to prevent homelessness by providing temporary rental assistance for eligible low income individuals and families who are currently homeless or are at risk of becoming homeless. The City of Miami Gardens had previously funded Citrus Health Network in 2009 with HUD Homeless Prevention and Rapid Re-Housing Program (HPRP) funds to help create the HAND Program.

2	Agency/Group/Organization	Miami-Dade County Homeless Trust
	Agency/Group/Organization Type	Services - Housing Services-Children Services-Elderly Persons Services-Persons with Disabilities Services-Persons with HIV/AIDS Services-Victims of Domestic Violence Services-homeless Services-Health Services-Education Services-Employment Service-Fair Housing Services - Victims
	What section of the Plan was addressed by Consultation?	Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Homelessness Strategy Non-Homeless Special Needs

	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	The City of Miami Gardens maintains open lines of communication with this organization and the input was taken into consideration when addressing program needs. The Trust has established the COAP to provide coordinated single entry referral and placement into permanent housing programs, including Rapid Re-Housing assistance. Referral to housing programs assisted by, or through partnerships with, the Homeless Trust is coordinated by the Homeless Trust Housing Coordinator. All persons entering the shelters, transitional housing and those engaged on the streets are assessed utilizing the VI-SPDAT assessment tool and referral is based on chronicity and medical vulnerability assessment scores and the housing assistance needed. In March 2017, the City entered into a Memorandum of Understanding with the Trust to provide much needed services to the City of Miami Gardens.
3	Agency/Group/Organization	Miami Job Corps
	Agency/Group/Organization Type	Services-Education Services-Employment
	What section of the Plan was addressed by Consultation?	Economic Development
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	This organization was consulted through stakeholder meetings held during the citizen participation process. The City of Miami Gardens maintains open lines of communication with this organization and the input was taken into consideration when addressing program needs.
4	Agency/Group/Organization	Miami-Dade Public Housing and Community Development
	Agency/Group/Organization Type	PHA
	What section of the Plan was addressed by Consultation?	Public Housing Needs

Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	This organization was consulted through meetings, phone calls, and e-mails to obtain direct information and input in the specific areas of the Action Plan where their expertise and input was required. The consultation provided information needed in the development of the plan.
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Identify any Agency Types not consulted and provide rationale for not consulting

There were no agency types not consulted during this 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	Miami-Dade County Homeless Trust	The Plan is consistent with the goals and strategic plan of the Continuum of Care and the plan to end homelessness.
Local Housing Assistance Plan	Florida Housing Finance Corporation	The Plan is consistent with the Local Housing Assistance Plan, which is based on the criteria established by FHFC to serve low and moderate- income households by providing housing assistance and homeownership opportunities.
City of Miami Gardens Comprehensive Plan	City of Miami Gardens	All planning efforts are consistent with the overall goals of the City of Miami Gardens Comprehensive plan.
Analysis of Impediments to Fair Housing Choice	City of Miami Gardens	The AI was used to address sections of the Action Plan related to fair housing issues within the City of Miami Gardens.

Table 3 – Other local / regional / federal planning efforts

Narrative (optional)

The City of Miami Gardens works with Miami-Dade County in the implementation and coordination of its programs. The County has an array of housing, community development and public service programs that help to enhance the current services and programs available through the City. The City is committed to additional cooperation with neighboring communities and Countywide housing and community development efforts and will participate in local and regional meetings and forums and will regularly review the availability of information published on the County's website. In the process of developing this plan, the City consulted with Citrus

Health Network, Miami-Dade County Homeless Trust, Miami Job Corps, Miami-Dade Public Housing and Community Development and low-income individuals.

The State of Florida provides a number of programs and services that help to enhance current services and programs provided by the City that are made available to assist residents. Through the Florida Housing Finance Corporation, the Florida Housing Coalition, and the Department of Economic Opportunity, residents and non-profit organizations can receive training and technical assistance and learn about programs and services available to residents. This is used as a tool to leverage funding for programs, increase participation, and learn about services available to local organizations, service providers and residents.

AP-12 Participation – 91.105, 91.200(c)

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

The City's citizen participation plan adheres to HUD's requirements set within the City's Citizen Participation Plan. This plan includes soliciting participation from all City residents, including minorities, non-English speakers, and low- and moderate-income persons, particularly those living in slum or blighted areas, as well as those with any disability. Citizen views were obtained through public hearings that addressed housing and community development, development of proposed activities and review of program performance. The City held two public meetings which also informed the public of the Action Plan and offered residents an opportunity to present their comments on the plan. A 30-Day public comment period also opened from June 24 to July 26, 2018 to further give the public an opportunity to provide comments on the proposed plan.

Citizen Participation Efforts for the Annual Action Plan

The City held citizen participation efforts for the AAP. Efforts are listed below:

The City made a Notice of Funding Availability Request for Proposals for Public Services activities in Miami Gardens on April 11, 2018. Local agencies and non-profits were invited to apply. A part of the Request for Proposal, there was a Technical Assistance Workshop held on March 29, 2018 at 10:00 AM and a make-up session on April 3, 2018 at 10:00 AM. A Pre-Bid Meeting was also held on April 3, 2018 at 11:30 AM. The deadline to submit proposals was May 9, 2018 at 5:00 PM.

Two public meetings were held on Monday, May 21, 2018 at the Miami Gardens City Hall, Community Room, 18605 NW 27 Avenue, 1st Floor Miami Gardens, FL 33056 at 10:00 AM and 5:30 PM. The meetings took place to inform the public of the Action Plan and offer residents an opportunity to present their comments on the draft plan.

30-Day public comment period for the draft of the 2018 Annual Action Plan opened from June 24 to July 26, 2018. In this time period, residents had the opportunity to provide comments on the proposed plan.

A public hearing was also held on July 11, 2018 for the approval of the 2018 Action Plan by City Council.

Citizen Participation Outreach

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
1	Public Meeting	Non-targeted/broad community	One (of two) public meetings targeted to City residents was held on May 21 at 10:00 a.m. at the Miami Gardens City Hall.	No comments were received.	All comments were accepted.	
2	Public Meeting	Non-targeted/broad community	One (of two) public meetings targeted to City residents was held on May 21 at 5:30 p.m. at the Miami Gardens City Hall.	No comments were received.	All comments were accepted.	

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)
3	Public Meeting	Non-targeted/broad community	<p>The City made a Notice of Funding Availability Request for Proposals for Public Services activities in Miami Gardens on April 11, 2018. Local agencies and non-profits were invited to apply. A part of the Request for Proposal, there was a Technical Assistance Workshop held on March 29, 2018 at 10:00 AM and a make-up session on April 3, 2018 at 10:00 AM. A Pre-Bid Meeting was also held on April 3, 2018 at 11:30 AM. The deadline to submit proposals was May 3, 2018 at 5:00 PM.</p>	<p>On March 29, there were 31 local agencies/non-profits that attended the Technical Assistance Workshop and another 19 local agencies/non-profits attended the make-up session on April 3, 2018.</p>	<p>No comments were received. All comments were accepted.</p>	

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)
4	30-Day Public Comment Period	Non-targeted/broad community	Residents had an opportunity to provide comments on the proposed plan by submitting oral or written comments during the 30-day comment period (June 24-July 26, 2018). The Plan was made available online on the City website and at City Hall.	There were no comments made.	All comments were accepted.	

5	Public Hearing	Non-targeted/broad community	A public hearing was held on July 11, 2018 for the approval of the 2018 Action Plan by City Council.	<p>The Community Development Director highlighted the funding allocations and staff recommendations concerning the Annual Action Plan. One comment from the public asked to clarify the report, and the understanding of those in attendance of the report. Another comment from the public asked that a copy of the presentation was provided to the public for all future presentations relating to the CDBG grant.</p>	One comment was not accepted because it was not related to the Annual Action Plan.	
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Table 4 – Citizen Participation Outreach

Expected Resources

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

The City of Miami Gardens CDBG allocation from HUD, for program year 2018 will be \$1,095,994.

In addition to the CDBG funding provided by HUD, the City also anticipates an annual allocation of approximately \$439,663 and an estimated \$4,500 program income from the State of Florida's State Housing Initiative Partnership Program (SHIP).

Anticipated Resources

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
CDBG	public - federal	Acquisition Admin and Planning Economic Development Housing Public Improvements Public Services	1,095,994	0	0	1,095,994	2,191,988	
Other	public - state	Admin and Planning Housing	444,163	0	0	444,163	888,326	Based on award issued by the state.SHIP: \$439,663SHIP Program Income: \$4,500

Table 5 - Expected Resources – Priority Table

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

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 owns single family homes that are part of the NSP program, which will be reconstructed and sold to first time buyers.

The property addresses are:

- 3801 NW 208 Street
- 3840 NW 210 Terrace
- 3501 NW 213 Terrace
- 2320 NW 162 Street Road

The City is also pursuing administrative foreclosure on homes that are unsafe and demolished as part of the NSP. While not currently owned, they may be acquired during this Action Plan period. There is one home listed this year:

- 4021 NW 189 Terrace

Discussion

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	Improve & Expand Public Infrastructure	2016	2020	Non-Housing Community Development	Citywide	Improved Public Facilities & Infrastructure	CDBG: \$131,197	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 1000 Persons Assisted
2	Increase Capacity of Area Service Providers	2016	2020	Non-Housing Community Development	Citywide	Expanded Public Service Offerings	CDBG: \$166,399	Public service activities other than Low/Moderate Income Housing Benefit: 1700 Persons Assisted
3	Preserve Existing Housing Stock	2016	2020	Affordable Housing	Citywide	Increased Affordable Housing Options	CDBG: \$340,401 SHIP: \$282,785	Homeowner Housing Rehabilitated: 25 Household Housing Unit
4	Provide for New Affordable Housing Opportunities.	2016	2020	Affordable Housing	Citywide	Increased Affordable Housing Options	SHIP: \$161,378	Homeowner Housing Added: 2 Household Housing Unit Tenant-based rental assistance / Rapid Rehousing: 9 Households Assisted
5	Improve & Expand Economic Development Activity	2016	2020	Non-Housing Community Development	Citywide	Expand Economic Development Opportunities	CDBG: \$247,174	Jobs created/retained: 30 Jobs Businesses assisted: 3 Businesses Assisted Buildings Demolished: 3 Buildings

Table 6 – Goals Summary

Goal Descriptions

1	Goal Name	Improve & Expand Public Infrastructure
	Goal Description	Improvements and expansion of the public infrastructure in Miami Gardens. These activities, such as storm water drainage improvements, will improve the existing public infrastructure in LMI neighborhoods.
2	Goal Name	Increase Capacity of Area Service Providers
	Goal Description	Increase the capacity of area service providers. Public Services are intended to help assist LMI residents and include activities such as a food pantry, after school tutoring, and services for child abuse victims.
3	Goal Name	Preserve Existing Housing Stock
	Goal Description	Preservation of existing housing stock through a variety of housing rehabilitation programs including owner occupied housing. These activities will benefit LMI households in the City with much needed housing repairs.
4	Goal Name	Provide for New Affordable Housing Opportunities.
	Goal Description	Provide for new affordable housing opportunities through the construction of new housing units for ownership. Additionally, the City shall provide for programs to increase homeownership opportunities including first time homebuyer counseling, financial literacy training, and down payment assistance programs.
5	Goal Name	Improve & Expand Economic Development Activity
	Goal Description	The City will fund economic development activities to benefit LMI residents in Miami Gardens. The City will work towards helping LMI individuals create/retain jobs and assist eligible businesses. This will also include demolition activities to clear abandoned commercial sites for redevelopment.

Projects

AP-35 Projects – 91.220(d) Introduction

The following projects have been identified for funding during the 2018 program year.

- Administration
- Economic Development
- Public Services
- Housing Programs
- Public Infrastructure

Projects

#	Project Name
1	2018: CDBG Administration
2	2018: CDBG Economic Development Activities
3	2018: CDBG Public Services
4	2018: CDBG Housing Programs
5	2018: CDBG Public Facilities & Infrastructure

Table 7 - Project Information

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

Priorities were determined based on stakeholder and community input, as well as the short- and long-term needs of the community.

The primary obstacle to meeting underserved needs is funding. The lack of available funds that has been discussed elsewhere in this plan severely limits the levels of accomplishment that are possible and in many cases forces difficult choices between worthy needs, leaving some unmet.

A prime example is the cost of housing in South Florida. The ability of the City of Miami Gardens to ensure the availability of affordable housing for all residents, and the amenities necessary to support their desired lifestyle, is severely limited by housing costs.

In Economic Development, activities are often measured in terms of job creation. Meeting all of the employment needs in any community can be compromised by factors and trends in the global, national, and regional economies that are beyond the control of a local jurisdiction. Taxation policies, labor standards, and regulatory programs of the state and federal

government can all also pose obstacles to a City meeting its job creation goals.

Finally, many public service activities have been particularly hard hit by the recent cuts in government funding, and the City's budget is no exception. If reductions in funding continue, it will force the City to make hard decisions on which priority area to fund to the detriment of others.

AP-38 Project Summary
Project Summary Information

1	Project Name	2018: CDBG Administration
	Target Area	Citywide
	Goals Supported	Improve & Expand Public Infrastructure Increase Capacity of Area Service Providers Preserve Existing Housing Stock Provide for New Affordable Housing Opportunities. Improve & Expand Economic Development Activity
	Needs Addressed	Improved Public Facilities & Infrastructure Expanded Public Service Offerings Increased Affordable Housing Options Expand Economic Development Opportunities Improve Efforts to End Homelessness
	Funding	CDBG: \$212,823
	Description	The City of Miami Gardens will utilize \$212,823 of the annual CDBG allocation, and will not exceed the 20% max cap as allowed by HUD regulations, for the administration of the CDBG program throughout the City. This may include disaster recovery planning and preparedness efforts.
	Target Date	9/30/2019
	Estimate the number and type of families that will benefit from the proposed activities	N/A
	Location Description	Citywide
	Planned Activities	CDBG Administration including staff salaries and program related expenses. Disaster recovery planning and preparedness efforts.
2	Project Name	2018: CDBG Economic Development Activities
	Target Area	Citywide
	Goals Supported	Improve & Expand Economic Development Activity
	Needs Addressed	Expand Economic Development Opportunities
	Funding	CDBG: \$247,174
	Description	The City will utilize \$247,174 of the CDBG allocation for economic development activities throughout the City. This will include demolition to clear abandoned commercial sites for redevelopment.
	Target Date	9/30/2019

	Estimate the number and type of families that will benefit from the proposed activities	The project will serve LMI persons: Jobs created/retained: 30 Jobs Businesses assisted: 3 Businesses Assisted Buildings demolished: 3 building demolished
	Location Description	Citywide based on participant eligibility.
	Planned Activities	CDBG economic developments: Small business Incentive Program Demolition to clear abandoned commercial sites for redevelopment
3	Project Name	2018: CDBG Public Services
	Target Area	Citywide
	Goals Supported	Increase Capacity of Area Service Providers
	Needs Addressed	Expanded Public Service Offerings
	Funding	CDBG: \$164,399
	Description	The City will utilize 15% of the annual allocation, as allowable by HUD regulations, to provide funding for much needed public services benefiting low to moderate income residents of Miami Gardens.
	Target Date	9/30/2019
	Estimate the number and type of families that will benefit from the proposed activities	Public service activities other than Low/Moderate Income Housing Benefit: 1,700 Persons Assisted
	Location Description	Citywide based on income eligibility.
	Planned Activities	Public Services include: food pantry, after school tutoring, services for child abuse victims, others as yet unidentified.
4	Project Name	2018: CDBG Housing Programs
	Target Area	Citywide
	Goals Supported	Preserve Existing Housing Stock Provide for New Affordable Housing Opportunities.
	Needs Addressed	Increased Affordable Housing Options
	Funding	CDBG: \$340,401 SHIP: \$444,163

	Description	Each year the City of Miami Gardens sets aside a portion of the CDBG allocation to assist local homeowners with much needed repairs. This program year, the City will allocate \$340,401 in CDBG funds to housing related activities supporting low to moderate income residents. In the event of a hurricane or other natural disaster, the City may elect to utilize CDBG funds to prioritize assistance households that have been displaced or otherwise impacted by the disaster. SHIP/HLMP funds are also used to help assist local LMI homeowners with much needed repairs.
	Target Date	9/30/2019
	Estimate the number and type of families that will benefit from the proposed activities	Homeowner Housing Rehabilitated: 25 Household Housing Unit Homeowner Housing Added: 2 Household Housing Unit
	Location Description	Citywide based on income eligibility.
	Planned Activities	Homeowner Housing Rehabilitation Homeownership Assistance
5	Project Name	2018: CDBG Public Facilities & Infrastructure
	Target Area	Citywide
	Goals Supported	Improve & Expand Public Infrastructure
	Needs Addressed	Improved Public Facilities & Infrastructure
	Funding	CDBG: \$131,197
	Description	The City will utilize \$131,197 in CDBG funds to improve and expand existing public infrastructure within low to moderate income neighborhoods. In the event of a hurricane or other natural disaster, the City may elect to utilize CDBG funds and to prioritize funding allocations to repair impacted public facilities and infrastructure.
	Target Date	9/30/2019
	Estimate the number and type of families that will benefit from the proposed activities	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 1000 Persons Assisted
	Location Description	Citywide
	Planned Activities	Storm water drainage improvements

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 of Miami Gardens has identified several neighborhoods that have more than 50% of their residents within the low-to-moderate income range category, as defined by HUD.

Generally, the City does not direct its assistance based primarily on geographic location. The CDBG program allows resources to be allocated based on income characteristics of the beneficiaries. Therefore, funding for the public service activities and housing programs will be allocated citywide based on documented income or presumed benefit. CDBG funded public infrastructure projects and economic development activities will be prioritized in the City's low- and moderate-income census tracts.

Geographic Distribution

Target Area	Percentage of Funds
Citywide	100
LMI Area	0

Table 8 - Geographic Distribution

Rationale for the priorities for allocating investments geographically

Since the primary national objective of the CDBG program is to benefit low- and moderate-income residents, the City of Miami Garden's CDBG program funds will be utilized to develop programs and activities that will provide assistance to this target population, and benefit the City as a whole in improving the quality of life for the residents.

Discussion

N/A

Affordable Housing

AP-55 Affordable Housing – 91.220(g)

Introduction

Based on the project funding for the 2018 program year, the City of Miami Gardens will provide for affordable housing for 27 low- to moderate-income households utilizing CDBG and SHIP funding. Twenty-five (25) owner occupied homes will be rehabilitated and two (2) first-time homebuyers will receive assistance with the purchase of their home.

Through the City's current agreement with Citrus Health Network, the City allocates funding from the SHIP Program for the Rental Assistance Program Strategy to help residents avoid homelessness or to be rapidly re-housed from homelessness. The allocated amount will assist a minimum of 9 households.

One Year Goals for the Number of Households to be Supported	
Homeless	9
Non-Homeless	27
Special-Needs	0
Total	36

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

One Year Goals for the Number of Households Supported Through	
Rental Assistance	9
The Production of New Units	2
Rehab of Existing Units	25
Acquisition of Existing Units	0
Total	36

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

Discussion

Homeowner Housing Rehabilitated: 25 Household Housing Unit

Homeowner Housing Added: 2 Household Housing Unit

Rapid Re-Housing for the Homeless: 9 Households Assisted

AP-60 Public Housing – 91.220(h)

Introduction

The City of Miami Gardens is part of the service area for the Miami-Dade County Public Housing and Community Development (PHCD) department. As the sixth largest housing agency in the nation, PHCD administers over 9,500 public housing units and about 16,000 Housing Choice Vouchers.

PHCD's waitlists for public housing, moderate rehabilitation developments, and Housing Choice Vouchers are currently closed. The agency's latest waitlists released in 2014 show Public Housing and Moderate Rehabilitation waitlists to be 28,362 and 17,916 applicants, respectively. The Housing Choice Voucher waitlist was created in 2008 and includes over 72,000 households.

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

PHCD undertakes numerous efforts to improve the living environment for its public housing residents. In addition to ongoing maintenance and improvement of properties, PHCD encourages tenants to form Resident Councils; works with residents, law enforcement, and social service providers to reduce crime in public housing; and helps residents connect with jobs and social services. The Agency also allows up to 200 Family Self-Sufficiency (FSS) program participants to participate in the Section 8 Tenant-Based Homeownership Program, and is applying for a Resident Opportunities and Self-Sufficiency (ROSS) grant.

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

The Miami-Dade Public Housing and Community Development Department (PHCD) encourages public housing residents to become more involved in the management of the housing developments and to participate in homeownership through its Family Self-Sufficiency (FSS) program. PHCD has also implemented a Section 8 homeownership program to provide Section 8 participants the opportunity to purchase a home. The housing agency also offers a variety of homeownership programs to low- and moderate-income families through its Development and Loan Administration Division. Homeownership programs include: Surtax, State Housing Initiative Partnership, HOME, and infill programs.

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

The Miami-Dade County Public Housing Agency is no longer designated as “troubled”. The merger of the County’s Public Housing Agency with their Housing and Community Development

Department has helped to focus future planning efforts as well as current operations.

Discussion

N/A

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

Introduction

At this time, the City of Miami Gardens is not an ESG recipient. However, the City will continue to support the efforts of the Miami-Dade County Homeless Trust and local service providers, including Citrus Health Network. The City has recently partnered with the Homeless Trust to use \$45,000 of SHIP funds as a match for their application to the State for ESG funds. The City will also pursue matching funds from Miami-Dade Public Housing and Community Development Department (PHCD) and the Homeless Trust. If the Homeless Trust is selected for funding, activities will include rapid re-housing for homeless individuals and families, and homeless prevention for families/individuals at risk of becoming homeless.

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

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

The City will work with the Homeless Trust to implement its specialized behavioral health outreach team known as "Lazarus". The Lazarus initiative targets homeless individuals with severe mental illness, many of whom are frequent users of crisis services such as jails and hospitals.

Addressing the emergency shelter and transitional housing needs of homeless persons

The City will continue to support the Homeless Trust's efforts to refer people who become homeless in Miami Gardens to the nearest appropriate shelter.

Emergency Housing:

- Increase coordination with One Stop Centers, State and Federal agencies and other social services systems to maximize available resources;
- Assess the impact of the hard-core, chronic homeless with high service needs and access to the emergency housing system to determine what additional resources may be required;
- Enhance the role of emergency housing in the "housing first approach" model to address homelessness by moving families and individuals directly into permanent housing;
- Increase the inventory of emergency housing serving the chronic homeless population

Phase Two - Primary Care (Transitional) housing.

Transitional Housing:

- Shift of Food and Beverage funding from transitional non-treatment housing to permanent housing, via a Housing 1st, housing placement program;
- Identify additional resources to maintain and/or expand the inventory of beds to provide mental health and substance abuse treatment;
- Identify a funding source for capital and supportive services match funds;
- Coordinate homeless funding by other local social service funders.

Helping homeless persons (especially chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth) make the transition to permanent housing and independent living, including shortening the period of time that individuals and families experience homelessness, facilitating access for homeless individuals and families to affordable housing units, and preventing individuals and families who were recently homeless from becoming homeless again

The Community Development department will continue its efforts to facilitate a partnership with Carrfour Supportive Housing and the North Dade Youth and Family Coalition.

The following describes the action steps which the Trust will implement in order to eliminate chronic homelessness.

Phase One - Temporary (Emergency) Care:

- Increase coordination with One Stop Centers, State and Federal agencies and other social services systems to maximize available resources;
- Assess the impact of the hard-core, chronic homeless with high service needs and access to the emergency housing system to determine what additional resources may be required.
- Enhance the role of emergency housing in the “housing first approach” model to address homelessness by moving families and individuals directly into permanent housing;
- Increase the inventory of emergency housing serving the chronic homeless population

Phase Two - Primary Care (Transitional) Housing:

- Shift of Food and Beverage funding from transitional non-treatment housing to permanent housing, via a Housing 1st, housing placement program;
- Identify additional resources to maintain and/or expand the inventory of beds to

provide mental health and substance abuse treatment;

- Identify a funding source for capital and supportive services match funds;
- Coordinate homeless funding by other local social service funders;

Phase Three - Advanced Care (permanent supportive) Housing Units:

- Creation of 100-200 units of permanent supportive housing per year, for 10 years;
- Via a new Case Rate, pay for performance model, those people identified by homeless outreach and the courts, who are experiencing chronic homelessness, high utilizers of jails, emergency rooms, and crisis services and are typically service resistant, are being placed in a variety of permanent housing models;
- Remove barriers to the funding of permanent housing: draft local and state legislative proposals that set-aside and/or prioritize housing for formerly homeless persons and participate actively in rule-making processes;
- Identify a funding source for capital match funds;
- Explore the use of permanent housing in the “housing first approach” in ending homelessness.

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.

In 2007, Miami-Dade County underwent a process to implement a cohesive community-wide discharge coordination policy. As a result of that process, the County developed a Memorandum of Agreement establishing discharge policies for all agencies that provide services to homeless persons or those at risk of homelessness. The interagency Agreement includes the Miami-Dade Homeless Trust, State and County Correction agencies, the 11th Circuit Court, Jackson Memorial Hospital/Public Health Trust, community mental health facilities, Our Kids, Inc., and the Florida Department of Children and Families.

The City has entered into an agreement with Citrus Health Network (CHN) as the lead agency in the Housing Assistance Network of Dade (HAND) Program, a multi-agency partnership with Miami-Dade County and local municipalities making an effort to prevent homelessness by providing temporary rental assistance for eligible low-income individuals and families who are currently homeless or are at risk of becoming homeless. The City of Miami Gardens had previously funded Citrus Health Network in 2009 with HUD Homeless Prevention and Rapid Re-Housing Program (HPRP) funds to help create the HAND Program. The City funded CHN (\$544,907) for three years from 2009 to 2012 at which time HPRP funding ended. Over the three years, CHN assisted 115 households for a total of 379 individuals avoid

homelessness. The current agreement allocates funding from the SHIP Program for the Rental Assistance Program Strategy to help residents avoid homelessness or to be rapidly re-housed from homelessness. The allocated amount will assist a minimum of 9 households.

Discussion

N/A

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

Introduction:

The City of Miami Gardens is an urban community that is steadily growing. The nationwide sub-prime mortgage and foreclosure crisis and subsequent economic downturn put downward pressure on home prices in the City. Furthermore, the economic crisis throughout the country created an increase in job losses and foreclosures thereby creating a decrease in persons who are “mortgage ready.” While this trend has stabilized somewhat, the overall impact has been lower home values throughout the City of Miami Gardens.

Actions it planned to remove or ameliorate the negative effects of public policies that serve as barriers to affordable housing such as land use controls, tax policies affecting land, zoning ordinances, building codes, fees and charges, growth limitations, and policies affecting the return on residential investment

The City of Miami Gardens has established a Comprehensive Development Master Plan and associated land development regulations specific to the City. In recognition of the impact that regulatory requirements have on the cost of development, the City has developed goals, objectives, and policies to address affordable housing issues in the City. These policies will guide all future growth management policies established by the City. The goals are as follows:

- Affordable Housing Incentives: Provide incentives to assist in the provision of affordable housing.
- Adopt land development regulations and appropriate policies that assist private developers with providing (and sustaining) affordable housing.
- Through the comprehensive planning process and the land development regulations, streamline the permitting process providing for efficient review with minimal delays and waiving or reducing costs for development with a substantial affordable housing component.
- Offer technical assistance and referral services to applicants interested in developing affordable housing opportunities.
- Investigate the feasibility of using inclusionary zoning to encourage or require a certain percentage of dwelling units of new development or redevelopment to be set aside for low- or moderate-income housing. The City has adopted a new zoning code that includes Article VI Housing which addresses the following
- Promote the development and provision of high quality housing in the City of Miami Gardens through these steps: Implement the goals, objectives and policies of the Housing Element of the City of Miami Gardens Comprehensive Development Master Plan to the maximum extent practicable; Implement the recommendations of the City of Miami Gardens Affordable Housing Advisory Committee to the maximum extent practicable; Increase and otherwise encourage home ownership opportunities within the city; Stimulate private sector production of workforce housing units for ownership,

available to families within the range of 65 percent to 200 percent of the area median income; Facilitate and encourage residential development that includes a range of high quality housing opportunities through a variety of residential types, forms of ownership, and home sale prices; Encourage even and widespread distribution of high quality housing opportunities throughout the City; and Insure that new housing in the City meets high quality development standards.

- Consider awarding density and height bonuses for the provision of workforce housing in new developments, on infill sites, or within mixed-use developments as referred to in the Future Land Use Element.
- Encourage the development of rental housing alternatives for family households. Examine the feasibility of adopting a mixed income ordinance that requires any new mixed- use development exceeding a specific threshold of units to include an affordable component.
- Develop incentive programs in conjunction with a Community Design Element of the Comprehensive Development Master Plan for increasing residential housing densities and providing enhanced urban amenities with funding programs for multistory parking, combining public open space, shared parking areas for use in high density/intensity projects and other similar techniques and mechanisms.

Discussion:

N/A

AP-85 Other Actions – 91.220(k)

Introduction:

The following statements address a variety of additional actions that will be carried out by the City and/or its partner agencies to enhance the delivery of housing and community development programs and services for the citizens of Miami Gardens.

Actions planned to address obstacles to meeting underserved needs

The primary obstacle to meeting all of the identified needs, including those identified as priorities is the general lack of funding resources available to the public and private agencies who serve the needs of low-to-moderate-income residents. Budgetary constraints have forced the City to make difficult decisions regarding the allocation of resources for programs in the community. This will impact the City's ability to fully fund all the program needs identified in the Action Plan and the 5-Year Consolidated Plan. However, the City will continue to foster existing partnerships and collaborate with new partners to bring needed resources, both financial and services, to meet the needs of the Miami Gardens Community.

Actions planned to foster and maintain affordable housing

The City will continue to provide funding for an owner-occupied housing rehabilitation program to maintain the existing affordable housing stock within the community.

Actions planned to reduce lead-based paint hazards

Participant property owners are notified of the hazards of lead-based paint and of the symptoms associated with lead-based contamination. The City of Miami Gardens further prohibits the use of lead-based paint in any federally funded construction or rehabilitation project.

The City of Miami Gardens shall either perform paint testing on the painted surfaces to be disturbed or replaced during rehabilitation activities, or presume that all these painted surfaces are coated with lead-based paint.

For residential properties receiving an average of up to and including \$5,000.00 per unit the City of Miami Gardens shall:

- Perform paint testing on the painted surfaces to be disturbed or replaced during rehabilitation activities, or presume that all these painted surfaces are coated with lead-based paint. If testing indicates that the surfaces are not coated with lead-based paint, safe work practices and clearance shall not be required. In addition, the City of Miami Gardens will follow all additional requirements as listed in 24 CFR 35.930 (b).
- For residential properties receiving an average of more than \$5,000.00 and up to and including \$25,000.00 per unit the City of Miami Gardens shall follow requirements of 24

CFR 35.930(c) which include but are not limited to risk assessments and interim controls.

- For residential properties receiving an average of more than \$25,000.00 per unit the City of Miami Gardens shall follow regulations as set forth in 24 CFR 35.930(d) which include abatement.

Actions planned to reduce the number of poverty-level families

The City of Miami Garden's Anti-Poverty Strategy describes the programs and policies that will be utilized to reduce the number of households with incomes below the poverty line, in coordination with affordable housing efforts. The Community Development Department will deploy a strategy responsive to the needs of low-income citizens and disadvantaged populations throughout the City.

The Community Development Department will further the HUD's national objectives by coordinating the priorities established in the City's visioning process with goals and objectives adopted by HUD.

The City's strategy will:

- Work with existing programs to maximize program dollars for residents.
- Leverage potential CDBG eligible activities with private, state, and local funds.
- Implement programs in the Neighborhood Revitalization Strategy Areas to maximize funding and program opportunities in neighborhoods with greater than 70% low to moderate-income residents.

Actions planned to develop institutional structure

The City of Miami Gardens Community Development Department is the lead administrative agency for the CDBG program. The Department provides fiscal and regulatory oversight of all CDBG funding, as well as other Federal and State grants for housing, economic, and community development. At this time there are no plans to expand the department. However, the City will continue to foster existing partnerships and collaborate with new partners to bring needed resources, both financial and services, to meet the needs of the Miami Gardens Community.

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

The City of Miami Gardens has limited resources to address the many priorities identified by the community. As such, during the upcoming year the City will continue working to create partnerships with other funding sources, public and private housing agencies, and health and

social service providers to leverage the CDBG allocation.

Each year the City makes every effort to reach out to residents, businesses and non-profit organizations to ensure their participation in this program year's process. The City advertised in the local paper and on its website and through email the annual action plan. The general public, city residents as well as public and private housing and social service agencies were invited to give their input on the City's goals and projects.

Discussion:

N/A

Program Specific Requirements

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

Introduction:

Community Development Block Grant Program (CDBG)

Reference 24 CFR 91.220(I)(1)

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

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

Other CDBG Requirements

1. The amount of urgent need activities	0
2. The estimated percentage of CDBG funds that will be used for activities that benefit persons of low and moderate income. Overall Benefit - A consecutive period of one, two or three years may be used to determine that a minimum overall benefit of 70% of CDBG funds is used to benefit persons of low and moderate income. Specify the years covered that include this Annual Action Plan.	80.00%

n/a

