



PALM BEACH  
*Gardens*

# City of Palm Beach Gardens



Community Development Block Grant  
Program Year 2022 Annual Action Plan  
July 2022

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## Executive Summary

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

#### 1. Introduction

The City of Palm Beach Gardens participates in the Community Development Block Grant (CDBG) Entitlement Program which is administered by the U.S. Department of Housing and Urban Development (HUD). As an entitlement community, the City receives an annual allocation of federal funding from HUD based on an allocation formula that considers factors such as population size and the number people living in poverty. The City's CDBG funding can be used for a wide range of housing and community development activities that must primarily benefit low-and moderate-income persons.

In order to receive the funding, the City is required to apply to HUD through a process called Consolidated Planning. The Consolidated Planning process requires that the City develop a Five-Year Consolidated Plan which describes the needs in the City and outlines a plan for how the CDBG funds will be used. The City must also develop this Annual Action Plan which provides more details on the actual activities and projects that the City will fund. This Program Year (PY) 2022-2023 Annual Action Plan is the City's third Annual Action plan of the 2020 Consolidated Plan. During the five years covered by the 2020 Consolidated Plan, the City expects to receive \$1,187,023 in CDBG funding. This assumes future annual allocations of \$235,674 – the City's allocation for PY 2022-2023.

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

The CDBG program has three objectives included in the 2020 Consolidated Plan: creating suitable living environments, providing decent affordable housing, and creating economic opportunities. Corresponding outcomes are accessibility/availability, affordability, and sustainability. Out of the three objectives, this year's annual action plan focused on Suitable Living Environments.

#### 3. Evaluation of past performance

During the term of the City's previous Consolidated Plan, the Planning and Zoning Department created and implemented the Owner-Occupied Rehabilitation Assistance Program, a program designed to preserve and extend the life of the existing housing stock by providing financial assistance to income eligible homeowners to make their housing more affordable. The City has successfully completed 23 rehabilitation projects in the past six years and has several construction projects underway working towards a goal of 35 houses, ultimately. The goal of rehabilitating owner-occupied housing units remains a goal in this Consolidated Plan because City residents continue to demonstrate a need for housing assistance.

Within the first and second year of the City's second Consolidated Plan (2020-2024), the City has completed the required environmental review, initiated the process for acquisition of right-of-way of

Dania Drive, and began engaging with the residents of Mary Circle and Dania Drive. These steps are towards the implementation of the Mary Circle and Dania Drive waterline improvements project.

The Mary Circle and Dania Drive water line improvements project projected costs are anticipated to exceed the estimated 5-year CDBG award amount. The City plans to address the gap in funding needs of the project by utilizing the gas tax fund. Additionally, a pre-award costs approval will be sought from the HUD Miami field office.

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

Interdepartmental consultation with City Council, City Administration, and the City's Engineering Department regarding the Mary Circle and Dania Drive waterline improvements project has taken place on all aspects of the project.

To encourage citizen participation and solicit feedback, a two-column display advertisement was published on Thursday, June 30, 2022 in the *Palm Beach Post*, a newspaper of daily general circulation, announcing a 30-day comment period on this annual action plan which was available for review both in person at City Hall, as well as on the City's CDBG webpage. The advertisement also included a section in Spanish encouraging members of the limited English proficiency (LEP) public to call and comment about the program. The advertisement also indicated that a public hearing would be held at the regular City Council meeting scheduled for Thursday, July 14, 2022 where comments from the public could also be accepted. The public hearing location is ADA accessible, and all members from the public were invited to comment. The City also has a TDD machine available for members of the public that require assistance for hearing impairments.

#### **5. Summary of public comments**

There are no public comments submitted on the proposed annual action plan at this time.

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

There were no comments, opinions, or statements rejected during the course of the public comment period, survey collection, or publicly available meetings.

#### **7. Summary**

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

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

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

Agency Role	Name	Department/Agency
Lead Agency	City of Palm Beach Gardens	
CDBG Administrator	City of Palm Beach Gardens	Planning and Zoning Department Engineering Department

**Table 1 – Responsible Agencies**

**Narrative (optional)**

The City of Palm Beach Gardens Planning and Zoning Department is the lead agency responsible for administering federal grant funding received from the U.S. Department of Housing and Urban Development (HUD) under the Community Development Block Grant (CDBG) Entitlement Program. With the primary goal of this year’s annual action plan being improve access to public infrastructure, the City of Palm Beach Gardens Engineering Department is assisting in the implementation of the project.

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

### **1. Introduction**

The City of Palm Beach Gardens welcomes input from citizens, local agencies, and other stakeholders in the development and implementation of the City's Action Plan.

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

The Federal Consolidated Plan regulations require that the City consult with public and private agencies, government organizations, and public housing authorities during the preparation of the Annual Action Plan. As an entitlement recipient of federal funds, the City of Palm Beach Gardens aims to continue building relationships and work closely with other agencies to provide resources for the City's residents on the City CDBG website for health, mental health and other services.

The City coordinates with and supports Palm Beach County's Continuum of Care, which is now known as the Homeless and Housing Alliance (HHA). This organization provides many coordinated initiatives and programs for health services, social and fair housing services, institutions and systems that care for discharged persons, and corrections programs, specifically with the provision of many supportive housing projects in various locations throughout the County to assist these homeless individuals or individuals who are at risk of becoming homeless. The City primarily supports through attendance of and participation in HHA quarterly meetings, and regular communication with HHA staff. The County's Senator Philip D. Lewis Homeless Resource Center (HRC) serves as the central point of access for all homeless populations, ensuring that needs are uniformly and fairly evaluated. The City supports the Lewis Center. Additionally, the City performs a Comprehensive Review on an annual basis of the full schedule of the Continuum of Care programs. The HHA also serves as a clearinghouse for disseminating information regarding various support programs, and City CDBG staff receive these communications and routinely posts and provides this information on the City's CDBG webpage.

An advertised public hearing was held on July, 14 2022 to solicit input on the Action Plan. Additionally, individual consultations are conducted with the Mayor, Vice Mayor and Councilmembers in advance of the hearing so that they can provide input on the program. In particular, the City's Media Relations Department, the Building Department, and the Code Compliance Division of Unified Services have been especially critical in the marketing, development, and successful operation of the program.

#### **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.**

City staff routinely reviews Palm Beach County's Continuum of Care projects for consistency with the City's Consolidated Plan. Many programs are available to assist the homeless and those at risk of becoming

homeless. There are no layers of overlap between the City's Strategic Plan and the Continuum of Care, and therefore the programs complement each other nicely.

There are no homeless shelters or housing facilities within the City of Palm Beach Gardens city limits, however Palm Beach County offers several locations in close proximity for services, such as the Philip D. Lewis Center, which assists homeless individuals and families in need by assessing for service eligibility, providing information, and referrals to agencies and resources in Palm Beach County.

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

The City is not a recipient of ESG funds at this time.

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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

<b>Agency/Group/Organization</b>	City of Palm Beach Gardens
<b>Agency/Group/Organization Type</b>	Grantee Department
<b>What section of the Plan was addressed by Consultation?</b>	Other: Non-Housing Community Development Needs
<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Staff of the Palm Beach Gardens Engineering Department were contacted directly to provide supporting documents and develop a proposed budget for a Public Infrastructure project to be carried out during PY 2022-2023.
<b>Agency/Group/Organization</b>	Palm Beach County Housing Authority
<b>Agency/Group/Organization Type</b>	PHA
<b>What section of the Plan was addressed by Consultation?</b>	Public Housing Needs
<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	A review of the PHAs Annual Plan was conducted and data related to the needs of public housing residents was secured from the Palm Beach County Department of Housing and Economic Sustainability who consulted directly with the PHA for preparation of the County’s Consolidated Plan. The City will support the initiatives of the Housing Authority.
<b>Agency/Group/Organization</b>	Homeless and Housing Alliance
<b>Agency/Group/Organization Type</b>	Services- homeless
<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Homeless Needs – Chronically homeless Homeless Needs – Families with children Homelessness Needs – Veterans Homelessness Needs – Unaccompanied Youth Homelessness Strategy Market Analysis
<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	The agency was contacted to provide data on homeless needs for the jurisdiction. The City will continue to coordinate with the HHA.

Table 2 – Agencies, groups, organizations who participated



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

The City endeavored to consult with all agency types. No agencies were intentionally excluded from the consultation process

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

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Name of Plan	Lead Organization	How do the goals of your Strategic Plan overlap with the goals of each plan?
Continuum of Care	Homeless and Housing Alliance of Palm Beach County	As the lead agency for the CoC, this plan guides the County's strategy for ending homelessness including those identified in this Plan.
Palm Beach County FY 2020-2024 Consolidated Plan	Palm Beach County Department of Housing and Economic Sustainability	Both the City of Palm Beach Gardens and Palm Beach County have identified the need to increase the supply of affordable housing as an objective in the respective Consolidated Plans.
Palm Beach County FY 2022-2023 Action Plan	Palm Beach County Department of Housing and Economic Sustainability	Both the City of Palm Beach Gardens and Palm Beach County have identified the need to increase the supply of affordable housing and suitable living environment as objectives in the 2022-2023 Annual Action Plan.
FY 2022 Annual PHA Plan	Palm Beach County Housing Authority	The mission of the Palm Beach County Housing Authority is to provide affordable housing for low-income persons including elderly persons and persons with disabilities. This goal is also part of the City's Strategic Plan.
Comprehensive Land Use Plan	City of Palm Beach Gardens	The goal of rehabilitating existing housing units addresses the affordable housing need and aligns with the Housing Element of the City's Comprehensive Plan.
Standards for Onsite Sewage Treatment and Disposal Systems	State of Florida Department of Health	Currently some areas of the City are not in compliance with health department codes and the goal of improving access to public infrastructure directly relates to addressing this code requirement.
PY 2020-2024 Analysis of Impediments to Fair Housing Choice (AI)	City of Palm Beach Gardens	The goals and strategies included in the AI are incorporated into the City's Strategic Plan.

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

**AP-12 Participation – 91.105, 91.200(c)**

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

To encourage citizen participation and solicit feedback, a two-column display advertisement was published on Friday, July 1, 2022 in the *Palm Beach Post*, a newspaper of daily general circulation, announcing a 30-day comment period on this annual action plan which was available for review both in person at City Hall, as well as on the City’s CDBG webpage. The advertisement also included a section in Spanish encouraging members of the limited English proficiency (LEP) public to call and comment about the program. The advertisement also indicated that a public hearing would be held at the regular City Council meeting scheduled for Thursday, July 1, 2022 where comments from the public could also accepted. The public hearing location is ADA accessible, and all members from the public were invited to comment. The City also has a TDD machine available for members of the public that require assistance for hearing impairments. All comments from the public will be considered.

**Citizen Participation Outreach**

**Table 4 – 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	Newspaper Ad	Non-targeted/broad community; Non-English Speaking – Spanish.	There was no formal response.	No comments were submitted at this time.	There were no comments that were not accepted	N/A
2	Public Hearing	Non-Targeted	There was no attendance from the public at the meeting regarding this item.	No comments were submitted at this time.	There were no comments that were not accepted	N/A

## Expected Resources

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

#### Introduction

As an entitlement recipient of federal funds, the City of Palm Beach Gardens anticipates receiving an annual allocation of Community Development Block Grant (CDBG) funds. The City will continue to explore applying for additional funding opportunities, such as HO E funds and State Housing Initiative Partnership (SHIP) funds.

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**Anticipated Resources**

**Table 5 - Expected Resources – Priority Table**

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 3				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	\$235,674	\$0	\$242,391	\$478,065	\$716,613	The CDBG Entitlement program provides annual grants to develop viable urban communities by providing decent housing and a suitable living environment, and by expanding economic opportunities, principally for low- and moderate-income persons.

**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 funds may leverage additional resources for projects that have a budget shortfall. The City has identified public infrastructure as a priority need and will utilize CDBG funds for infrastructure projects in eligible areas. The anticipated project cost for infrastructure projects is expected to exceed the City's annual CDBG allocation and the City may seek other funding, such as gas tax, to fill any gaps.

There is no match requirement for the CDBG program.

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

The City does not have any publicly owned land or property that is available to address the needs identified in this Plan.

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## 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 access to public infrastructure	2021	2024	Non-Housing Community Development	Citywide	Public Infrastructure	CDBG: \$188,539.20	Public facility or infrastructure activities other than low/moderate-income housing benefit: 1,175 Persons Assisted
2	CDBG Program Administration	2021	2024	Other: Planning and Administration	Citywide	CDBG Program Administration	CDBG: \$47,134.80	Other: N/A

**Table 6 – Goals Summary**

**Goal Descriptions**

<b>Goal Name</b>	Improve access to public infrastructure
<b>Goal Description</b>	Funds will be used to improve the living environment of individuals and families in eligible areas through the construction or installation of infrastructure improvements.
<b>Goal Name</b>	CDBG Program Administration
<b>Goal Description</b>	Funds will be used for staff costs related to overall program management, monitoring, and evaluation.

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## Projects

### AP-35 Projects – 91.220(d)

#### Introduction

During PY 2021-2022, the City will fund two projects with its CDBG allocation. The first project, the Mary Circle and Dania Drive Waterline improvements project, is a public infrastructure project to be carried out in a low- and moderate-income area of the City. The project includes water main extension and roadway improvements to increase the availability of municipal services to residential properties in the area. The project will meet the Low/Mod Area Benefit national objective and will support the City's Strategic Plan goal of improving access to public infrastructure.

The second project allocates 20 percent of the City's annual CDBG allocation for program administration costs related to program management, monitoring, and evaluation.

#### Projects

#	Project Name
1	Mary Circle and Dania Drive waterline improvements
2	CDBG Program Administration

**Table 7 - Project Information**

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

The City's funding priorities are the same as those outlined in the Strategic Plan. Funding is prioritized for projects that have a "High" need as supported by data in the Needs Assessment and Market Analysis, local reports/studies, surveys, and local knowledge of residents, City department, and other stakeholders. The City of Palm Beach Gardens adheres to all program-specific eligibility requirements when allocating fun

**AP-38 Project Summary**  
**Project Summary Information**

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<b>1</b>	<b>Project Name</b>	Mary Circle and Dania Drive water line improvements
	<b>Target Area</b>	N/A
	<b>Goals Supported</b>	Improve access to public infrastructure
	<b>Needs Addressed</b>	Public Infrastructure
	<b>Funding</b>	CDBG: \$193,912.80
	<b>Description</b>	The City will use CDBG funds to construct and improve public infrastructure including water main extension and roadway improvements. The project will benefit all the residents of the immediate service area
	<b>Target Date</b>	9/30/2024
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	Based on CDBG Low- and Moderate-Income data for FY 2020, 1,175 individuals reside in the census block group where the project will be implemented, including 620 (52.77%) individuals that are low- and moderate-income
	<b>Location Description</b>	The project is located in Census Tract 10.04, Block Group 2.
	<b>Planned Activities</b>	Water improvements and costs of street repairs made necessary by the improvements
<b>2</b>	<b>Project Name</b>	CDBG Program Administration
	<b>Target Area</b>	Citywide
	<b>Goals Supported</b>	CDBG Program Administration
	<b>Needs Addressed</b>	Program Administration and Planning
	<b>Funding</b>	CDBG: \$48,478.20
	<b>Description</b>	The City will use CDBG funds for costs associated with the management and oversight of the CDBG Program by the City's Planning & Zoning Department
	<b>Target Date</b>	9/30/2021

<b>Estimate the number and type of families that will benefit from the proposed activities</b>	N/A
<b>Location Description</b>	Citywide
<b>Planned Activities</b>	General program administration costs for staff engaged in program management, monitoring, and evaluation

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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 of Palm Beach Gardens did not identify target areas in the Strategic Plan however the City has determined that CDBG funds will be directed to geographic areas in the City that qualify under the Low/Mod Area Benefit (LMA) National Objective. These include residential neighborhoods where a majority of the residents are low- and moderate-income persons. Palm Beach Gardens is an exception community for PY 2022-2023 and can carry out area benefit activities in an area containing at least 40.3% LMI residents.

For PY 2022-2023, CDBG funds will be allocated to the Mary Circle and Dania Drive water line improvements project. The activity is located in census tract 10.04, block group 2 which has a LMI population of 52.77%.

**Geographic Distribution**

<b>Target Area</b>	<b>Percentage of Funds</b>
The City of Palm Beach Gardens	<b>100%</b>

**Table 8 - Geographic Distribution**

**Rationale for the priorities for allocating investments geographically**

The City adheres to all program-specific eligibility requirements when allocating funds. Funds are allocated on a priority need basis in neighborhoods that demonstrate compliance with HUD’s low- to moderate-income criteria. The map on the following page identifies LMI census block groups in the City of Palm Beach Gardens.

## Affordable Housing

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

#### Introduction

The City will utilize CDBG funds from prior years to continue the implementation of the Housing Rehabilitation program which serves income-eligible homeowners. The City does not plan on providing any affordable housing units with funding from PY 2022-2023.

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

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

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

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

#### Discussion

It is estimated that with the available CDBG resources from prior years, approximately 7 existing housing units will be rehabilitated during PY 2022.

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

### **Introduction**

The City of Palm Beach Gardens does not have any public housing development within its jurisdictional boundaries, and therefore relies on assistance provided by the Palm Beach County Housing Authority (PBCHA).

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

The City does not have any actions planned to address public housing during the next year.

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

The City supports PBCHA in their efforts to provide affordable housing including the goal of increasing homeownership. To encourage public housing residents to become more involved in management and homeownership, the PBCHA will:

- Continue to have a resident board member on the PBCHA Board of Commissioners who is directly assisted under PBCHA's public housing or HCV program. The resident board member will take part in decisions related to the administration, operation, and management of PBCHA's programs.
- Adopt rent policies and assess any programs that support and encourage work and/or homeownership.
- Continue to partner with local & regional workforce partners to increase the number of employed/under-employed persons in assisted housing.
- Provide programs, tools and resources for job skills development, job training and employment of public housing residents through resident programs and services, Section 3 program, scholarships, and other available resources.
- Increase resident and voucher holder participation in the Family Self-Sufficiency (FSS) program.

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

Palm Beach County Housing Authority is not designated troubled.

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

### **Introduction**

The need for affordable housing and community development activities were common themes expressed throughout the 2020 Consolidated Plan survey. According to the survey respondents, the most important public service needs related to persons experiencing homelessness and persons with other special needs are mental health counseling, health services, domestic violence services, and senior services. One respondent noted the importance of never losing electricity, which is an activity that can substantially assist persons with special needs shelter in place during a disaster or return home after a disaster quickly. Historically, the City has provided support to the City's elderly residents using CDBG for its home repair program and the City will continue to implement this program during PY 2022-2023.

Specific to persons experiencing homelessness, the survey respondents highlight homelessness prevention activities which includes rental assistance and rapid rehousing, outreach to persons experiencing homelessness, and permanent housing as the highest need activities in the jurisdiction. Other moderately ranked activities related to persons experiencing homelessness and other persons with special needs identified in the Survey include transportation assistance, substance abuse education/services, services for person with disabilities, services for neglected/abused children, and youth services.

### **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**

Providing outreach to persons living in an unsheltered location brings services to individuals who may otherwise choose to not seek out services which can aid in their recovery and resolve their homeless episode. The City relies on the CoC to develop and execute strategies to identify and engage person who are unsheltered and staying in an uninhabitable location within the City.

The Southeast Behavioral Health Network (SEFBHN) funds Mobile Response Teams, through South County Mental Health Inc., with the goal of preventing unnecessary psychiatric hospitalizations. Mobile Response Teams provide mobile crisis intervention services for all of Palm Beach County.

The City will continue to work in coordination with the Homeless and Housing Alliance, the CoC, to support evidence-based initiatives to engage and rehouse persons experiencing literal homelessness.

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

The City of Palm Beach Gardens is committed in serving its homeless populations. The City does not currently have any homeless shelters within its City limits but supports countywide homeless initiatives to help address the housing needs of homeless persons.

**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 City continues to participate in CoC-led meetings to support the Homeless and Housing Alliance's efforts of making homelessness rare, brief, and one-time in the community. The City's residents who participated in the 2020 Consolidated Plan survey emphasized their desire for increased affordable housing in the City, which is an essential component of ending homelessness. Increasing the supply of affordable housing will decrease the amount of time people experience a homeless episode, as permanent housing is the solution to ending a crisis caused by lack of housing. Supportive housing programs offer financial assistance toward rent paired with supports intended to help households stabilize and retain their housing, among other recovery supports.

**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.**

To ensure low- and moderate-income households and those with special needs avoid homelessness, the City will dedicate prior years CDBG funding to a home rehabilitation program to make housing units more affordable and improve the housing conditions.

Palm Beach County will continue to use local, state, and federal funding to support numerous homeless prevention activities including, but not limited to, providing financial assistance for emergency rent and/or utility payments, the Traveler's Aid Program that provides relocation assistance to homeless individuals and families who find themselves stranded in Palm Beach County, participation in the Reentry Task Force whose mission is to implement comprehensive re-entry services to ex-offenders, and the Lewis Center will continue to coordinate with area hospitals and mental health facilities to permit discharged patients to receive referrals to the Lewis Center to access homeless services.

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

### **Introduction:**

Government regulations including land use/zoning codes and building codes adopted by a jurisdiction have the potential to impact the cost of housing and limit the supply of affordable housing. The City of Palm Beach Gardens recognizes that there can be institutional, regulatory, or policy barriers to development and promotion of access to affordable housing. Some of these barriers are at the discretion of City policymakers. Generally, the following barriers may impact the development of affordable housing:

- Development approvals process: the development approval process can be time- and resource-intensive, particularly for developers of affordable housing.
- Density restrictions: depending on the maximum allowable density in any given zoning category, higher density housing developments may be prohibited. Higher density housing is typically able to absorb more income-restricted housing and still maintain profitability for the developer, in addition to naturally enhancing the availability of housing overall.
- Parking and setback requirements: depending on the restrictions of parking and setbacks in the local land use code and comprehensive plan, these requirements may prohibit development of affordable housing.
- Affordable housing accessible to transit: low-income households are more likely to depend on public transportation as a means of mobility. A lack of affordable housing near public transportation networks places an inherent restriction on a family's ability to reasonably access housing.
- Not in My Back Yard (NIMBY) Syndrome: the social and financial stigma of affordable housing can lead to significant resistance from community members.

The City developed an Analysis of Impediments to Fair Housing Choice (AI) to identify impediments or barriers to affordable housing and fair housing choice and plans to take actions toward the resolution of the barriers. In 2020 the City updated its AI and identified the following impediments that may have an impact on the availability of affordable housing:

1. Single-family zoned communities making up a majority of Palm Beach Gardens do not allow a mix of housing types or accessory dwelling units.
2. Palm Beach Gardens has no publicly assisted housing within city limits, leading to a shortage of affordable housing.
3. HOAs are a prominent feature of the built environment in Palm Beach Gardens, suggesting a need for consistent and professional training on fair housing rights, best practices, and

regulations for HOAs.

4. The most common reason for home loan denial is poor credit history.

During 2019, the City engaged a consultant, Strategic Planning Group, to develop a Workforce Housing Program. The Workforce Housing Report was adopted in November 2020 and identifies a variety of solutions for increasing the housing options available to middle-income workers in the City. The workforce housing solutions include establishing a housing trust fund, permitting accessory dwelling units in certain communities with larger lots, and a number of incentives to encourage developers to include workforce housing in projects such as, density bonuses, waiving or crediting of impact fees, and waiving building permit application review fees.

**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 identified actions to increase the supply of affordable housing and to address the impediments in the AI related to zoning policies and practices.

In addition, the Housing Element of the City's Comprehensive Land Use Plan addresses the City's desire to combat barriers to affordable housing. The Housing Element includes the following goals and objectives in support of affordable housing:

**GOAL 3.1.: THE PROVISION OF SUSTAINABLE, SAFE AND SANITARY HOUSING WHICH MEETS THE NEEDS OF ALL EXISTING AND FUTURE PALM BEACH GARDENS RESIDENTS.**

- Objective 3.1.1.: Strive to fulfill the City housing needs while promoting sustainable and energy efficient standards.
- Objective 3.1.2.: Assist the private sector to provide housing of the various types, sizes, and costs to meet the housing needs of all existing and anticipated populations of the City. Toward this objective, the City shall maintain land development regulations, consistent with Section 163.3202 F.S., to facilitate public and private sector cooperation in the housing delivery system.
- Objective 3.1.3.: Continue to identify and assess any substandard units located within the City limits.
- Objective 3.1.4.: Encourage housing and supportive services for the elderly and special needs residents.
- Objective 3.1.5.: Provide for adequate sites for group homes, manufactured homes and mobile homes to ensure that the needs of persons requiring such housing are met.
- Objective 3.1.6.: Through continued monitoring and enforcement of building and housing codes,

the City shall strive to conserve and extend the useful life of the existing housing stock and stabilization of older neighborhoods.

GOAL 3.2.: THE PROVISION OF AFFORDABLE AND WORKFORCE HOUSING BY PRESERVING EXISTING STABLE NEIGHBORHOODS, REHABILITATING NEIGHBORHOODS THAT HAVE DECLINED, AND DEVELOPING NEW RESIDENTIAL DEVELOPMENTS.

- Objective 3.2.1.: Promote programs and other means to ensure that affordable and workforce housing are provided to residents of all income ranges to sustain a balanced community and economic growth.
- Objective 3.2.2.: Continue to designate adequate sites with appropriate land use and density on the Future Land Use Map, the City shall ensure that adequate supply of land exists in the City for the private sector to provide for the housing needs of the extremely low, very low, low and moderate income families, essential service personnel, the elderly, and special need residents.

Each objective of the Housing Element also includes several policies in support of affordable housing initiatives. The complete Housing Element and its polices can be found at <https://www.pbgfl.com/DocumentCenter/View/93/Housing-PDF>.

The City will also combat barriers to affordable housing through its ongoing Housing Rehabilitation Program. This Program will help address poverty (e.g. low-income homeowners) and remove possible life safety housing hazards including roof repair and accessibility for the disabled and special needs individuals.

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

### **Introduction:**

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

There are various obstacles to meeting needs within the City. The primary obstacle to meeting underserved needs is insufficient resources to meet the needs identified in the outreach conducted for this Action Plan. Addressing all housing, homeless, and community development needs is a difficult task due to lack of funding. The City will utilize all possible resources and endeavors to secure additional private and public sources of financing over the course of the program year to meet underserved needs.

Participation in the CDBG program and the relationship with HUD has spring-boarded the City into studying and participating in working toward a solution for the affordable housing crisis in Palm Beach County. The City's Comprehensive Plan includes provisions for exploring workforce housing density bonuses and expedited permitting. Strategic Planning Group, a consultant hired by the City to develop a Comprehensive Workforce Housing Study, finalized its report in 2020 and it identifies strategies or solutions the City will pursue to increase the supply of workforce housing. This report was adopted in November 2020, along with a Staff written report on specific solutions that meets the City's needs. The City is continuing with implementation of the adopted 2020 Comprehensive Workforce Housing Study report and the accompanied Staff report with Land Development Regulations and Comprehensive Plan amendments.

The current housing market and economic environment also serve as barriers to meeting needs as rental rates and home values have significantly increased while incomes have stayed stagnant increasing the number of families and individuals needing access to housing assistance.

#### **Actions planned to foster and maintain affordable housing**

To foster and maintain affordable housing, the City will implement the actions outlined in its Analysis of Impediments to Fair Housing Choice.

The City will also maintain affordable housing through its ongoing Housing Rehabilitation Program. This Program will help address poverty (e.g. low-income homeowners) and remove possible life safety housing hazards including roof repair and accessibility for the disabled and special needs individuals.

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

The State of Florida's Department of Health works closely with local governments to ensure the goals of the eliminating childhood lead poisoning program are met. The primary goal is to eliminate lead poisoning in children under 72 months of age. Local initiatives include the coordination of case management, development of primary prevention strategies, building partnerships, and increasing the number of blood lead screenings in children.

The City will require mandatory lead-based paint inspection, both interior and exterior, of all qualified

applicants to the City's CDBG rehabilitation program in accordance with the monetary thresholds established in the federal guidelines, and related abatement if necessary. If the City comes across a project where lead-based paint is identified as an issue, the City will address and take appropriate steps to reduce the hazard. Staff will also distribute required lead-based paint educational materials to each applicant during the assistance application intake process. The homeowner is provided copies of the original test report and the clearance report, if applicable.

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

The City will continue to carry out goals and objectives established within the Consolidated Plan to assist in reducing poverty by implementing projects and activities that have been identified as the most beneficial to its residents and to assisting families in need.

The City will continue to partner with both public and private entities to address the needs of low- and moderate-income families as well as addressing families living in poverty. The City also assists residents in locating existing services in Palm Beach County and other municipalities.

#### **Actions planned to develop institutional structure**

The City's Planning and Zoning Department serves as the lead entity in carrying out the Consolidated Plan. The City coordinates its limited resources through a single department which facilitates the coordination of all rehabilitation efforts targeted to low-to-moderate income households throughout the City. Staff coordinates efforts with other Palm Beach County governmental agencies as well as neighboring cities, via regular communication with the staff responsible for administering the housing and community development programs. The City has developed sufficient capabilities for implementing and administering programs in house and continues to foster agency coordination. Collaboration between local, county, and state agencies is important in successfully carrying out the goals and objectives identified in the Consolidated Plan and addressing community needs.

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

The City has made great efforts to increase agency coordination by continuing to communicate the City's strategic goals. It is essential that the Planning and Zoning Department foster and maintain partnerships with other departments, agencies, and organizations to ensure housing and community development goals are consistent with other planning initiatives. Coordinating efforts has proven to be more impactful and effective when delivering programs and services.

The City has a resources page on its website which lists available social services that may help the public find various kinds of assistance. The City will continue to reach out and communicate to the public the different avenues to access assistance.

**Program Specific Requirements**

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

**Introduction:**

The City of Palm Beach Gardens expects to have \$238,871 in CDBG funding available during program year 2021-2022. The funds will be used for eligible activities including Public Infrastructure Improvements and Planning and Administration.

**Community Development Block Grant Program (CDBG)**

**Reference 24 CFR 91.220(I)(1)**

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
<b>Total Program Income</b>	

**Other CDBG Requirements**

1. The amount of urgent need activities	0
2. The estimated percentage of CDBG funds that will be used for activities that benefit persons of low and moderate income Overall Benefit - A consecutive period of one, two or three years may be used to determine that a minimum overall benefit of 70% of CDBG funds is used to benefit persons of low and moderate income. Specify the years covered that include this Annual Action Plan.	100.0%

**Appendix – Public Comments**

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