

2024-2028 CONSOLIDATED PLAN

2024 ANNUAL ACTION PLAN

for Submittal to the U.S. Department of Housing and Urban Development

Community Development Block Grant (CDBG)

HOME Investment Partnerships Program (HOME)

Emergency Solutions Grant (ESG)

August 6, 2024 Lee County Board of County Commissioners Human and Veteran Services 2440 Thompson St., Fort Myers, FL 33901

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Executive Summary

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

1. Introduction

The 2024-2028 Consolidated Plan is a required submission to sustain entitlement funding from the U.S. Department of Housing and Urban Development (HUD). The Community Development Block Grant (CDBG), HOME Investment Partnership Program (HOME), and the Emergency Solutions Grant (ESG) programs are continued through this process. This five-year plan identifies community needs and sets goals and objectives to address those needs with this funding. The Annual Action Plan for HUD Program Year 2023-2024 is also included herein and will provide more detailed information regarding the first year's use of funds.

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

The needs identified in the Needs Assessment section of the Consolidated Plan are generally consistent with past needs, with emphasis on the need for affordable housing and housing assistance.

Lee County identified six goals based on 11 priority needs outlined in the 2024-2028 Consolidated Plan. These goals include:

- Affordable Housing Construction, Rehabilitation, and Assistance
- Public Services and Homeless/Special Needs Services
- Shelter, Public Facility, and Infrastructure Improvements
- Emergency/Urgent Needs and Disaster Recovery
- Urban County Needs (Sanibel, Bonita Springs, Fort Myers Beach, and Estero)
- Program Administration

3. Evaluation of past performance

Past project performance provided the basis for identification and selection of the goals and projects included in the 2024-2028 Consolidated Plan. Projects such as housing rehabilitation, carried out with CDBG funds, and downpayment assistance, carried out with HOME funds, have had long-term success within Lee County. Successful outcomes were also obtained through the HOME Tenant-Based Rental Assistance (TBRA) program. These programs will be continued under the 2024-2028 Consolidated Plan. Many of the programs from previous plans will be continued due to continued need, and past successes. However, priorities have been re-organized to better reflect current community needs.

Lee County has faced several challenges in the recent past that have created additional needs. On September 28, 2022, a category 4 hurricane made landfall on Lee County. Hurricane lan was one of the strongest storms to ever make landfall in the United States. The catastrophic destruction from Hurricane lan left the community devastated and compounded the existing strain on resources. The need for additional affordable housing units was highlighted in the already limited housing market. To this end, Lee County has framed the available HUD funding to strengthen non-profit housing development with HOME funds. This will provide for non-profit developers to add additional affordable units in the county. Lee County will use CDBG and HOME funds to provide downpayment assistance. The success from past funding of downpayment assistance allowed a greater number of households to utilize HUD funding to obtain affordable housing. CDBG funds will also be used for non-profit capital improvements to increase the support of non-profit service providers.

As the community emerges from the hurricane and the COVID-19 pandemic, inflation continues to rise nationwide. The economic impacts on households with incomes at or below 80% of the area median income are significant. Those needs include additional affordable housing units, rental assistance, economic support, and expanded mental/behavioral health services.

In addition to needs resulting from Hurricane Ian and the COVID-19 pandemic, other community needs were identified through a gaps analysis that was completed for Lee County in 2019. The three dominant gaps identified were in the areas of behavioral health, housing, and transportation. Staff consulted the community during the planning process and evaluated past project outcomes. Through this consultation, it was determined that the continuation of many of the previous years' projects and programs is essential.

4. Summary of citizen participation process and consultation process

Citizen participation was gathered through public meetings, an online public survey, Focus Group, Community Action Agency (CAA) public hearing, 30-day comment period, and Board of County Commissioners (BoCC) public hearing. Attendees at the public meetings and public hearings included representatives from non-profit organizations, neighborhood advisory councils, various government departments, and Lee County residents.

The public meetings, Focus Group, and CAA public hearing provided attendees with an overview of the Consolidated Plan and Annual Action Plan planning process, and an overview of current funding allocations. Attendees were also provided an opportunity to convey the priority needs and assets within their community, and all of Lee County. Online survey respondents were also asked to identify the highest priority needs for the county. Many of these needs were identified to be affordable housing and housing assistance (foremost), homeless shelter and services, public services, public facility improvements, access to transportation, public safety/crime prevention, code enforcement/blight elimination, and job skills or employment opportunities. Citizens and stakeholders were also encouraged to submit comments via email to the Lee County Human and Veteran Services (HVS) department at any time prior to and until the end of the 30-day comment period held in July 2024.

The public meetings, public hearings (CAA and BoCC), and online public survey were publicly noticed, distributed to local non-profit and neighborhood organizations via email, posted by Lee County press/social media release, and posted on the Lee County website.

Consultation was conducted via e-mail and at a Focus Group consultation meeting on May 14, 2024, and CAA public hearing on June 18, 2024. Attendees at the Focus Group consultation meeting included representatives from non-profit organizations, neighborhood advisory councils, various government departments and Lee County residents. The public meetings and CAA public hearing provided attendees with an overview of the Consolidated and Annual Planning process and recent data regarding program outcomes, funding allocations, and eligible block groups/neighborhoods, and solicited input regarding the prioritization of needs. Additional consultation was conducted at a series of public meetings held in February and March 2024, with the general public and in conjunction with the Housing Equity Plan and 2024 Community Needs Assessment (both under development).

The draft plan was also made available for a 30-day public comment period in July 2024. On August 6, 2024, after providing opportunity to hear public comments at its regular meeting, the Board of County Commissioners approved the Consolidated Plan and Annual Action Plan for submittal to HUD.

5. Summary of public comments

Although there are many issues that Lee County's citizens find important, several needs were prioritized during the citizen participation process:

- New Construction and Rehabilitation for Affordable Housing
- Rental and Down Payment Assistance
- Housing Counseling, Housing Legal Aid
- Homeless Housing and Shelter
- Special Needs Housing and Shelter
- Public Services
- Public Facility Improvements
- Public Infrastructure Improvements
- Code Enforcement/Blight Elimination
- Public Safety/Crime Prevention
- Job/Employment Skills, Education

Significant public comment was received during the public meetings and the public survey which garnered over 500 responses. A summary of comments received, and the results of the survey

responses are attached to this plan and can be viewed in the **Citizen Participation Comments** (attachment).

Comments submitted during the 30-day public comment period and prior to the Board of County Commissioners approval on August 6, 2024, were limited to email and letter correspondence dated July 31, 2024, from an individual representing the Pine Manor Improvement Association. In summary, the comments were threefold: (1) keep "Public Services for Community Revitalization" as a strategic goal; (2) keep "Public Services for Community Revitalization" as a priority need; and (3) maintain "Central Fort Myers" as a geographic priority. The individual who submitted these comments also attended the Focus Group consultation meeting and CAA public hearing held on May 14, 2024, and June 18, 2024, respectively, where the same comments were shared.

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

All comments received were considered during the formation of the plan and selection of projects to be carried out over the 2024-2028 planning cycle.

Although public infrastructure improvements (including transportation/transit), code enforcement/ blight elimination, public safety/crime prevention, and job skills/education were identified during the citizen participation process as priority needs, those needs were ranked lower than higher priority needs such as affordable housing, shelter, public services, and public facilities. However, it is important to note that lower-ranked needs may still be addressed during the five-year planning cycle as dictated by available funding and project availability if not funded during the first year.

Moreover, some needs ranked as lower priority may be funded under broader but related goals, such as those related to public services or public facilities. See **PR-10**, **PR-15**, and **Citizen Participation Comments** (attachment) for more detail regarding the comments received during the citizen consultation and citizen participation process.

Comments pertaining to keeping "Public Services for Community Revitalization" as a strategic goal and priority need were considered and captured by the new strategic goal of "Public Services and Homeless/Special Needs Services" and new priority need for "Public Services", which are intended to support projects that address unmet needs for public services. Moreover, the new strategic goal of "Shelter, Public Facility, and Infrastructure Improvements" is intended to support projects that improve the living environment for eligible individuals, households, and neighborhoods. The corresponding priority needs for these new goals collectively address the revitalization needs of low- and moderate-income neighborhoods in Lee County (i.e., public services, public facility improvements, public infrastructure improvements, code enforcement/blight elimination, and public safety/crime prevention). See **SP-25**, **SP-45**, and **AP-20**.

Regarding geographic priority, Pine Manor (and Page Park) are specifically listed as low- and moderateincome neighborhoods of focus under the new "Low-and Moderate-Income Areas (LMA)" Target Area. Many of the neighborhoods listed in **SP-10** are in Central and North Fort Myers (including Pine Manor); however, the new LMA Target Area adds other neighborhoods of focus with similar needs.

7. Summary

The 2024-2028 Consolidated Plan identifies goals and strategies to address the Lee County's housing and community development needs. These needs were prioritized through an extensive citizen participation process that involved citizens, community stakeholders, housing and public service providers, and staff of participating jurisdictions. The Consolidated Plan guides the use of CDBG, HOME, and ESG funds through six (6) goals. These goals are summarized as:

- Affordable Housing Construction, Rehabilitation, and Assistance
- Public Services and Homeless/Special Needs Services
- Shelter, Public Facility, and Infrastructure Improvements
- Emergency/Urgent Needs and Disaster Recovery
- Urban County Needs (Sanibel, Bonita Springs, Fort Myers Beach, and Estero)
- Program Administration

During the citizen participation process, including comments received during the public meetings, Focus Group, CAA public hearing, and online public survey, 11 priority needs were identified corresponding to the goals of the 2024-2028 Consolidated Plan. Those 11 priorities included:

- New Construction and Rehabilitation for Affordable Housing
- Rental and Down Payment Assistance
- Housing Counseling/Legal Aid
- Homeless/Special Needs Housing and Shelter
- Public Services
- Public Facility Improvements
- Public Infrastructure Improvements
- Code Enforcement/Blight Elimination
- Public Safety/Crime Prevention
- Job Skills/Education
- Emergency/Urgent Needs

The Process

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

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

The following are the agencies/entities responsible for preparing the Consolidated Plan and those responsible for administration of each grant program and funding source.

Agency Role	Name	Department/Agency
Lead Agency	LEE COUNTY	
CDBG Administrator	LEE COUNTY	Human and Veteran Services
HOME Administrator	LEE COUNTY	Human and Veteran Services
ESG Administrator	LEE COUNTY	Human and Veteran Services

Table 1 – Responsible Agencies

Narrative

Lee County Human and Veteran Services (HVS) is responsible for preparing the Consolidated Plan. Lee County's entitlement consists of Community Development Block Grant (CDBG), HOME Investment Partnership Program (HOME), and Emergency Solutions Grant (ESG) programs, all of which are administered by HVS managers in several departmental program areas, with clerical and fiscal support. Subrecipient contracts with Urban County partners are monitored by HVS; however, some fieldwork is completed by municipal staff of the City of Sanibel, City of Bonita Springs, Town of Fort Myers Beach, and Village of Estero.

Consolidated Plan Public Contact Information

Questions and correspondence relating to the Consolidated Plan should be directed to Heather Leonard, Digital Operations Manager, Lee County Human and Veteran Services by mail at 2440 Thompson St., Fort Myers, FL 33901, by phone at 239-533-7940 or by e-mail at HLeonard@leegov.com.

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

1. Introduction

Consultation on the development of the plan began in February 2024, and was achieved through a variety of media and venues, including three (3) public meetings, an online public survey, one (1) Focus Group meeting, 30-day public comment period, and public hearings with the Community Action Agency (CAA) and Board of County Commissioners. Additionally, direct consultation with stakeholders occurred through phone calls and email correspondence. Effort was made to contact interested parties and obtain input. This consultation, including input from the public and non-profit and neighborhood organizations, provided the basis for identification of priority needs to be addressed during the five-year planning period. Solicitation for input on the Housing Equity Plan and 2024 Community Needs Assessment was received in conjunction with the citizen participation process for the 2024-2028 Consolidated Plan and 2024 Annual 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(I)).

Coordination between public and assisted housing providers and private and governmental health, mental health, and service agencies occurs regularly through Lee County HVS operations to provide coordinated client services. Several stakeholders representing these groups (public and assisted housing providers, health, mental health, and services agencies) attended the Focus Group meeting and CAA public hearing held for the 2024-2028 Consolidated Plan or were consulted directly during the planning process. These stakeholders included Lee Health, Lee County Public Housing Authority, Housing Authority of City of Fort Myers, Centerstone, SalusCare, and Community Cooperative, among others.

The Bob Janes Empowerment Center, which was an emergency shelter, was closed in 2024. The Empowerment facility was jointly funded by Lee County HVS, managed by Centerstone and SalusCare, and partners with local law enforcement and homeless service providers. The services lost with the closure of the Bob Janes Empowerment Center decreased the number of emergency shelter beds in Lee County.

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 2019, the Lee County Continuum of Care (CoC) adopted the 2019-2028 CoC Strategic Plan to guide the effort to address the housing needs of Lee County. The 2019-2028 Strategic Plan outlines accomplishments and goals relating to Housing, Health Services, Supportive Servies, Education and Employment Services, Public Safety and Transportation within Lee County. The Strategic Plan also

outlines overall goals to address homelessness in Lee County through supportive services and grants. Lee County HVS is the Lead Agency for the CoC and has spearheaded the local effort to ensure compliance with the HEARTH Act provisions. There is continuous coordination between Lee County, the Lee County Homeless Coalition, and the Continuum as a whole, to address the needs of persons who are homeless or at risk of homelessness. This includes discharge planning, identifying needs and gaps in the community, evaluating system and project performance, establishing system-wide written standards, and researching project models and funding sources.

Lee County continues to allocate ESG and HUD CoC funds to assist the homeless. In 2024, Lee County received approximately \$1.8 million in ESG-RUSH to further respond to homeless needs in Lee County, particularly those related to disaster recovery.

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

As previously noted, Lee County is the Lead Agency for the CoC, and is in continuous consultation with the Continuum Governing Board and General Membership, including consulting on ESG planning. Continuum members continue to support the current ESG program structure, in which Lee County HVS administers a portion of the ESG allocation to provide outreach and rapid re-housing assistance to eligible households.

In 2017, the Continuum of Care Governing Board established new project performance targets and approved continuum-wide written standards. In January 2018, the Board also approved the Coordinated Entry policies and procedures in accordance with CPD Notice 17-01. ESG projects are monitored annually, and outcomes are included in system performance measures.

In 2019, CoC Board members voted to change ESG funding from funding the operations of the Bob Janes Empowerment Center to funding Rapid Re-Housing for persons admitted to the Bob Janes Empowerment Center, and to continue the rapid re-housing program administered by Human and Veteran Services.

The CoC and Lee County Homeless Coalition was consulted during the development of the 2024-2028 Consolidated Plan regarding the needs of homeless persons and those at-risk of homelessness.

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

1	Agency/Group/Organization	Lee County Human and Veteran Services Department
	Agency/Group/Organization Type	Other (Grantee Department)
		Grantee Department
	What section of the Plan was addressed by	All sections
	Consultation?	Other (Strategic Plan, Annual Action Plan)
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Lee County Human and Veteran Services (HVS) is the grantee department responsible for coordination of citizen participation, prioritization, and goal setting. HVS is also the lead agency for the Continuum of Care (CoC).
2	Agency/Group/Organization	Lee County Economic Development
	Agency/Group/Organization Type	Business Leaders
	What section of the Plan was addressed by Consultation?	Non-Housing Community Development Strategy Anti-Poverty Strategy
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Lee County Economic Development was consulted through research of published plans, reports, and website content.
3	Agency/Group/Organization	Lee Cares (Hurricane Housing Recovery)
	Agency/Group/Organization Type	Regional Organization Planning Organization
	What section of the Plan was addressed by Consultation?	Housing Needs Assessment
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Lee Cares attended the public meetings on February 27, 2024, February 28, 2024, and March 4, 2024, with opportunity to provide input.
4	Agency/Group/Organization	Lee Health
	Agency/Group/Organization Type	Services-Health
	What section of the Plan was addressed by Consultation?	Non-Homeless Special Needs Non-Housing Community Development Strategy Other (Public Service Needs)

Table 2 – Agencies, groups, organizations who participated

	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Lee Health attended the Focus Group meeting on May 14, 2024, and provided input.
5	Agency/Group/Organization	City of Fort Myers Mayor's Diversity and Inclusion Advisory Committee
	Agency/Group/Organization Type	Other (Advisory Committee)
	What section of the Plan was addressed by Consultation?	Housing Needs Assessment Market Analysis
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Attended the Focus Group meeting on May 14, 2024, and provided input.
6	Agency/Group/Organization	City of Sanibel
	Agency/Group/Organization Type	Other government - Local
	What section of the Plan was addressed by Consultation?	Non-Housing Community Development Strategy
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	City of Sanibel was invited to attend public meetings and consulted by Lee County HVS staff about intergovernmental coordination for Urban County needs.
7	Agency/Group/Organization	City of Bonita Springs
	Agency/Group/Organization Type	Other government - Local
	What section of the Plan was addressed by Consultation?	Non-Housing Community Development Strategy
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	City of Bonita Springs was invited to attend public meetings and consulted by Lee County HVS staff about intergovernmental coordination for Urban County needs.
8	Agency/Group/Organization	Town of Fort Myers Beach
	Agency/Group/Organization Type	Other government - Local
	What section of the Plan was addressed by Consultation?	Non-Housing Community Development Strategy

9	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Town of Fort Myers Beach was invited to attend public meetings and consulted by Lee County HVS staff about intergovernmental coordination for Urban County needs.
9	Agency/Group/Organization Agency/Group/Organization Type	Village of Estero Other government - Local
	What section of the Plan was addressed by Consultation?	Non-Housing Community Development Strategy
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Village of Estero was invited to attend public meetings and consulted by Lee County HVS staff about intergovernmental coordination for Urban County needs.
10	Agency/Group/Organization	Lee County Housing Authority
	Agency/Group/Organization Type	РНА
	What section of the Plan was addressed by	Housing Needs Assessment
	Consultation?	Public Housing Needs
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Lee County Housing Authority was consulted through direct email and phone contact, as well as research of published plans, reports, and website content.
11	Agency/Group/Organization	The Housing Authority of the City of Fort Myers
	Agency/Group/Organization Type	РНА
		Services-Fair Housing
	What section of the Plan was addressed by	Housing Needs Assessment
	Consultation?	Public Housing Needs
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Housing Authority of City of Fort Myers was consulted through direct email and phone contact, as well as research of published plans, reports, and website content. Consultation regarding Fair Housing (AFFH) yielded comments regarding the need for Fair Housing education to prevent voucher discrimination. The Housing Authority of the City of Fort Myers holds regular landlord education sessions monthly. Potential for coordination with HVS and distribution of Fair Housing information.

12	Agency/Group/Organization	Lee County Community Action Agency/Neighborhood District Committee Advisory Board (CAA/NDC)
	Agency/Group/Organization Type	Other (Advisory Committee)
	What section of the Plan was addressed by	Homelessness Strategy
	Consultation?	Non-Housing Community Development Strategy
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	A public hearing with the CAA was held on June 18, 2024, with a majority of members in attendance.
13	Agency/Group/Organization	Lee County Homeless Coalition
	Agency/Group/Organization Type	Services-Homeless
	What section of the Plan was addressed by	Homeless Needs – Chronically homeless
	Consultation?	Homeless Needs – Families with children
		Homeless Needs – Veterans
		Homeless Needs – Unaccompanied youth
		Homelessness Strategy
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Lee County Homeless Coalition was consulted through direct email and phone contact, as well as research of published plans, reports, and website content.
14	Agency/Group/Organization	Area Agency on Aging for Southwest Florida
	Agency/Group/Organization Type	Services-Elderly Persons
	What section of the Plan was addressed by Consultation?	Non-Homeless Special Needs
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Attended the CAA public hearing held on June 18, 2024, with opportunity to provide input.
15	Agency/Group/Organization	BCW Enterprise Consulting Group
	Agency/Group/Organization Type	Services-Homeless
	What section of the Plan was addressed by Consultation?	Homelessness Strategy

	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Attended the CAA public hearing held on June 18, 2024, with opportunity to provide input.
16	Agency/Group/Organization	Centerstone
	Agency/Group/Organization Type	Other (Services-Mental Health/Substance Abuse)
	What section of the Plan was addressed by Consultation?	Non-Homeless Special Needs Non-Housing Community Development Strategy
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Attended the Focus Group meeting on May 14, 2024, and provided input.
17	Agency/Group/Organization	Goodwill Southwest Florida
	Agency/Group/Organization Type	Services-Employment
	What section of the Plan was addressed by Consultation?	Market Analysis Non-Housing Community Development Strategy Anti-Poverty Strategy
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Attended the CAA public hearing held on June 18, 2024, with opportunity to provide input.
18	Agency/Group/Organization	Greater Pine Island Civic Association
	Agency/Group/Organization Type	Civic Leaders Neighborhood Organization
	What section of the Plan was addressed by Consultation?	Non-Housing Community Development Strategy
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Attended the CAA public hearing held on June 18, 2024, with opportunity to provide input.
19	Agency/Group/Organization	GwynEducation, LLC
	Agency/Group/Organization Type	Services-Education
	What section of the Plan was addressed by Consultation?	Non-Housing Community Development Strategy

	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Attended the CAA public hearing held on June 18, 2024, with opportunity to provide input.
20	Agency/Group/Organization	Hearts and Homes for Veterans, Inc.
	Agency/Group/Organization Type	Other (Veterans)
	What section of the Plan was addressed by Consultation?	Housing Needs Assessment
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Attended the CAA public hearing held on June 18, 2024, with opportunity to provide input.
21	Agency/Group/Organization	Lehigh Community Services
	Agency/Group/Organization Type	Other (Public Services, Food Pantry)
	What section of the Plan was addressed by	Non-Housing Community Development Strategy
	Consultation?	Anti-Poverty Strategy
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Attended the CAA public hearing held on June 18, 2024, with opportunity to provide input.
22	Agency/Group/Organization	Pine Manor Improvement Association
	Agency/Group/Organization Type	Civic Leaders Neighborhood Organization
	What section of the Plan was addressed by Consultation?	Non-Housing Community Development
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Pine Manor Improvement Association attended the public meetings on February 27, 2024, February 28, 2024, and March 4, 2024, the Focus Group meeting on May 14, 2024, and the CAA public hearing held on June 18, 2024, and provided input.
23	Agency/Group/Organization	Quality Life Center of Southwest Florida, Inc.
	Agency/Group/Organization Type	Services-Children Services-Education Other (Services-Mental Health)

		1
	What section of the Plan was addressed by Consultation?	Non-Homeless Special Needs
		Non-Housing Community Development Strategy
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Attended the CAA public hearing held on June 18, 2024, with opportunity to provide input.
24	Agency/Group/Organization	SalusCare, Inc.
	Agency/Group/Organization Type	Other (Services-Mental Health/Substance Abuse)
	What section of the Plan was addressed by Consultation?	Non-Homeless Special Needs
	Consultation:	Non-Housing Community Development Strategy
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Attended the Focus Group meeting on May 14, 2024, and provided input.
25	Agency/Group/Organization	The Salvation Army
	Agency/Group/Organization Type	Services-Homeless
	What section of the Plan was addressed by	Homeless Needs – Chronically homeless
	Consultation?	Homeless Needs – Families with children
		Homeless Needs – Veterans
		Homeless Needs – Unaccompanied youth
		Homelessness Strategy
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	The Salvation Army attended the public meeting on February 27, 2024, with opportunity to provide input.
26	Agency/Group/Organization	УМСА
	Agency/Group/Organization Type	Services-Children
	What section of the Plan was addressed by Consultation?	Non-Housing Community Development Strategy
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	The YMCA attended the public meeting on February 27, 2024, with opportunity to provide input.

27	Agency/Group/Organization	Affordable Homeownership Foundation, Inc.
	Agency/Group/Organization Type	Services-Housing
		Services-Fair Housing
	What section of the Plan was addressed by Consultation?	Housing Needs Assessment Market Analysis
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Consultation regarding Fair Housing (AFFH) yielded comments regarding very low- and low- income persons displaced by the COVID-19 pandemic and Hurricane Ian experiencing Fair Housing issues to a greater extent than other groups. The observed basis of housing discrimination was familial status (number of children), source of income, and disability. This discrimination was compounded by the number of affordable housing units destroyed and competition with higher-priced tenants. Potential for coordination with CDBG-DR and ESG-RUSH programs for urgent needs.
28	Agency/Group/Organization	Habitat for Humanity of Lee & Hendry Counties
	Agency/Group/Organization Type	Housing Services-Fair Housing
	What section of the Plan was addressed by Consultation?	Housing Needs Assessment Market Analysis
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Consultation regarding Fair Housing (AFFH) yielded comments regarding (1) housing affordability and the high cost of insurance premiums, affecting both the immediate homeowner and the long-term sustainability of nonprofit lending organizations; (2) increase in small family households (elderly and young couples) not able to afford the available housing stock; and (3) limited assistance for foreclosure prevention. Potential for coordination with CDBG and HOME programs.

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

The initial three (3) public meetings held in February and March were open to the public and broadly advertised. Over 200 individuals representing various non-profit and neighborhood organizations throughout Lee County were invited to attend the Focus Group meeting held on May 14, 2024. The CAA public hearing held on June 18, 2024, was also advertised, and was attended by a majority of the CAA members, along with several members of the public.

Name of Plan	Lead	How do the goals of your Strategic Plan overlap with the goals
	Organization	of each plan?
Continuum of	Lee County	The Lee County Continuum of Care implemented a new Strategic
Care	Human and	Plan in April 2019, the Lee County Continuum of Care 2019-2028
	Veteran Services	Strategic Plan. Two goals of the 2024-2028 Consolidated Plan
		overlap with the CoC Strategic Plan: Public Services and
		Homeless/Special Needs Services and Shelter, Public Facility, and
		Infrastructure Improvements.
Housing	Lee County	Lee County, in collaboration with the City of Fort Myers, City of
Equity Plan	Human and	Cape Coral, is in the process of developing the Housing Equity
	Veteran Services	Plan. One goal of the 2024-2028 Consolidated Plan overlaps with
		the Housing Equity Plan: Affordable Housing Construction,
		Rehabilitation, and Assistance.
Community	Lee County	The Community Needs Assessment, as required by the Florida
Needs	Human and	Department of Economic Opportunity (DEO) as a condition of the
Assessment	Veteran Services	receipt of Community Services Block Grant (CSBG) funds, is still
		under development. Because the citizen participation efforts for
		this plan overlapped with those of the Consolidated Plan, many
		priority needs mirror those identified for the Community Needs
		Assessment. All goals of the Consolidated Plan overlap with the
		Community Needs Assessment, particularly those concerning
		affordable housing, public services, and neighborhood
		improvements.

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

Table 3 – Other Local/Regional/Federal Planning Efforts

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

Many of the programs and projects to be carried out during the program years will involve coordination with multiple agencies/entities. Cooperation and coordination to implement the Consolidated Plan will occur through intergovernmental coordination with other municipalities and counties. To that end, Lee County actively works with Urban County governments (including City of Sanibel, City of Bonita Springs, Town of Fort Myers Beach, and Village of Estero) and the cities of Fort Myers and Cape Coral to coordinate project delivery and avoid duplication of benefits. Additionally, Lee County works with a myriad of non-profit housing and public service providers countywide. Housing and public services are provided, in part, through partnerships with public housing authorities, Continuum of Care members, Florida's State Housing Initiatives Partnership (SHIP) program, and other public entities and funding sources as relevant.

Narrative (optional):

For the 2024-2028 Consolidated Plan, Lee County HVS consulted with over 20 stakeholders and directly invited over 200 non-profit and neighborhood organizations to participate in the process. This participation was in addition to the attendance at the initial public meetings held in conjunction with the Housing Equity Plan and 2024 Community Needs Assessment. Additionally, Lee County held an online survey, to which over 500 responses were submitted. Based on this consultation, Lee County identified 11 priority needs to be addressed during the five-year planning period.

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

1. Summary of citizen participation process/Efforts made to broaden citizen participation

Summarize citizen participation process and how it impacted goal setting.

Public input was solicited through a series of public meetings held on February 27, February 28, and March 4, 2024. These meetings were held in different areas of the county in the morning or evening, in an effort to broaden participation, and allow for working residents to attend. The meetings were noticed in the local newspaper, published on social media, and advertised through flyers distributed via email. Additionally, a Focus Group meeting was held on May 14, 2024, and a public hearing was held with the Community Action Agency (CAA) on June 18, 2024, both to solicit input from non-profit and neighborhood organizations.

During the public meetings, Focus Group, and CAA public hearing, attendees were provided an overview of the Consolidated Planning process, and information regarding current programs and funding. The public meetings, Focus Group, and CAA public hearing provided attendees the opportunity to discuss priority needs as relevant to themselves or their organization. These discussions informed the Consolidated Plan and produced 11 priority needs to be addressed over the five-year planning period and provide the basis for goals of the Strategic Plan. All project identified in the Annual Action Plan result from the priority needs as discussed.

During the planning process, Lee County also published an online public "Needs Assessment Survey" during April and May 2024 that offered citizens and stakeholders an opportunity to identify and prioritize needs and assets within Lee County. Over 500 survey responses were received. The survey results also informed the Consolidated Plan and were used to support the first-hand information received during the public meetings, Focus Group, and CAA public hearing.

A draft of the Consolidated Plan was also made available for a 30-day public comment period, starting July 1, 2024, and ending July 31, 2024. On August 6, 2024, after providing opportunity to hear public comments at its regular meeting, the Board of County Commissioners approved the Consolidated Plan and Annual Action Plan for submittal to HUD.

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	A public meeting was	Attendees from	All comments were	
		community	advertised and held on	neighborhood	accepted and considered	
			February 27, 2024,	organizations, religious	during the development	
			where comment was	institutions, housing and	of the 2024-2028	
			solicited on the	public service providers,	Consolidated Plan and	
			development of the	and other agencies were	2024 Annual Action Plan.	
			2024-2028	present. Discussion		
			Consolidated Plan and	focused on lack of		
			2024 Annual Action	affordable housing, need		
			Plan. The meeting took	for youth programming,		
			place at Lee County	education,		
			Human and Veteran	transportation		
			Services, where 18	disadvantaged		
			people attended in-	populations, food		
			person and 25 attended	deserts, lack of		
			online (virtually). The	affordable childcare, and		
			group was provided an	lack of job		
			overview of the	skills/education		
			planning responses.	opportunities.		
			Attendees were			
			engaged to discuss			
			priority needs.			
2	Public Meeting	Non-targeted/broad	In accordance with 24	Attendees from a	All comments were	
		community	CFR Part 91, a public	neighborhood	accepted and considered	
			meeting was advertised	organization (Pine	during the development	
			and held on February	Manor Improvement	of the 2024-2028	
			28, 2024, where	Association) and Lee	Consolidated Plan and	
			comment was solicited	Cares were present.	2024 Annual Action Plan.	

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)
			on the development of	Discussion at the public		
			the 2024-2028	meetings (February-		
			Consolidated Plan and	March 2024) focused on		
			2024 Annual Action	lack of affordable		
			Plan. The meeting took	housing (foremost) and		
			place at the Cape Coral	rental subsidy		
			Library, where 5 people	participation, lack of		
			attended. The group	transportation related to		
			was provided an	school/education		
			overview of the	opportunities and low		
			planning process.	teacher salaries,		
			Attendees were	transportation access		
			engaged to discuss	and pedestrian safety		
			priority needs.	issues, lack of access to		
				healthcare and food		
				deserts/food insecurity,		
				and lack of childcare and		
				jobs that pay a living		
				wage.		
3	Public Meeting	Non-targeted/broad	In accordance with 24	Attendees from a	All comments were	
		community	CFR Part 91, a public	neighborhood	accepted and considered	
			meeting was advertised	organization (Pine	during the development	
			and held on March 4,	Manor Improvement	of the 2024-2028	
			2024, where comment	Association), residents of	Consolidated Plan and	
			was solicited on the	Lehigh Acres, and Lee	2024 Annual Action Plan.	
			development of the	Cares were present,		
			2024-2028	along with other		
			Consolidated Plan and	members of the public.		
			2024 Annual Action	Discussion at the public		
			Plan. The meeting took	meetings (February-		

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)
			place at the East	March 2024) focused on		
			County Regional	lack of affordable		
			Library, where 14	housing (foremost) and		
			people attended. The	rental subsidy		
			group was provided an	participation, lack of		
			overview of the	transportation related to		
			planning process.	school/education		
			Attendees were	opportunities and low		
			engaged to discuss	teacher salaries,		
			priority needs.	transportation access		
				and pedestrian safety		
				issues, lack of access to		
				healthcare and food		
				deserts/food insecurity,		
				and lack of childcare and		
				jobs that pay a living		
				wage.		
4	Internet Outreach	Non-targeted/broad	An online public survey	Top Five Housing Needs:	All comments were	
		community	was made available on	Affordable Housing for	accepted and considered	
			Lee County's website	Rental (68%); Affordable	during the development	
			from mid-April thru	Housing for Ownership	of the 2024-2028	
			May 17, 2024. Over 500	(59%); Affordable Rental	Consolidated Plan and	
			survey responses were	Housing for Veterans	2024 Annual Action Plan.	
			received.	(59%); Affordable		
				Ownership Housing for		
				Veterans (58%); Housing		
				for Seniors/Elderly (Ages		
				62+) (57%)		

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)
				Top Five Homeless		
				<u>Needs</u> : Homeless		
				Shelters/Services for		
				Families w/Children		
				(68%); Mental Health		
				Services (64%);		
				Homeless		
				Shelters/Services for		
				Unaccompanied Youth		
				(54%); Resources for		
				Survivors of Domestic		
				Violence (52%);		
				Homeless		
				Shelters/Services for		
				Women Only (49%)		
				Top Five Public Facility		
				Needs: Mental Health		
				Facilities (62%);		
				Childcare Centers (47%);		
				Healthcare Facilities		
				(46%); Facilities for		
				Persons with Special		
				Needs/Disabilities (41%);		
				Youth Centers/Senior		
				Centers (41%)		
				Top Five Public		
				Infrastructure Needs:		
				Stormwater/Drainage		

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)
				Improvements (52%);		
				Street Improvements		
				(e.g., pavement, lighting,		
				etc.) (48%);		
				Potable/Drinking Water		
				System Improvements		
				(47%); Sanitary Sewer		
				System Improvements		
				(43%); Accessibility		
				Improvements for		
				Persons with Disabilities		
				(44%)		
				Top Five Economic or		
				Community		
				Development Needs:		
				Retaining/Keeping Jobs		
				in Lee County (52%);		
				Education/Workforce		
				Prep/Job Skills Training		
				(50%); Redevelopment		
				of Vacant/Abandoned		
				Properties (45%); Code		
				Enforcement/Blight		
				Removal (32%); New Job		
				Creation/Small Business		
				Incubation (25%)		
				Top Five Public Sondas		
				Top Five Public Service		
				Needs: Mental Health		

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)
				Services (64%); Senior		
				Services (49%);		
				Healthcare Services		
				(49%); Youth Services		
				(48%); Transportation		
				Services (48%)		
5	Public Meeting	Non-targeted/broad	In accordance with 24	Housing Needs: Need for	All comments were	
		community	CFR Part 91, a Focus	regional housing study	accepted and considered	
			Group meeting was	(e.g., Comprehensive	during the development	
			advertised and held on	Housing Strategy); Need	of the 2024-2028	
			May 14, 2024, where	for more one- and two-	Consolidated Plan and	
			comment was solicited	bedroom (small) units	2024 Annual Action Plan.	
			on the development of	for single or small-family		
			the 2024-2028	households (one-		
			Consolidated Plan and	bedroom, or shared		
			2024 Annual Action	housing options, having		
			Plan. The meeting took	greatest demand); Need		
			place at the Fort Myers	for Permanent		
			Regional Library, where	Supportive Housing		
			six people attended.	(PSH) and Public		
			The group was	Housing, particularly for		
			provided an overview	seniors/elderly needing		
			of the planning process.	higher level of care;		
			Attendees were	Need to rehabilitate		
			engaged to discuss	existing Public Housing		
			priority needs.	developments (e.g.,		
				Cypress Court)		
				Homeless Needs:		
				Emphasize "Housing		

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)
				First" directive; Growing		
				homeless population,		
				number of referrals per		
				week more than		
				doubling; More		
				neighborhood outreach		
				needed for homeless		
				prevention – To help		
				before situation reaches		
				"chronic" or "acute"		
				situation (e.g., before		
				DCF involvement, etc.);		
				Lack of homeless		
				shelters; Need for non-		
				profit partner to		
				operate; Need for		
				medical need beds in		
				shelters; Recognize		
				needs of Coordinated		
				Entry System, which is		
				primarily wrap-around		
				services (not only Rapid		
				Re-Housing (RRH));		
				Rapid Re-Housing as		
				"band-aid" but not long-		
				term solution for		
				homelessness – see		
				Public Services, long-		
				term wrap-around		
				services and gap		

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)
				assistance is needed;		
				Current emphasis on		
				chronic homelessness		
				for PSH, which pushes		
				everyone else into RRH		
				(problem); Prioritize		
				funding sources (e.g.,		
				ESG vs. CoC funding		
				sources) and choose best		
				ROI.		
				Public Facility Needs:		
				Community hubs and		
				gathering spaces (e.g.,		
				United Way, Rec. Center)		
				– "Suncoast"		
				neighborhood;		
				Recreation Centers,		
				Community Centers,		
				Libraries, etc.		
				Public Infrastructure		
				Needs: No public		
				infrastructure needs		
				identified aside from		
				transportation		
				assistance/services (see		
				Public Services).		

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)
				Economic or Community		
				Development Needs:		
				Continue geographic		
				priority target areas		
				from previous		
				Consolidated Plan.		
				Public Service Needs:		
				Focus NOFA on		
				leveraging/partnerships		
				for greatest		
				impact/Return on		
				Investment (ROI);		
				Enhanced direct social		
				services; Transportation		
				services/assistance for		
				transportation		
				disadvantaged; Wrap-		
				around services,		
				including mental health		
				counseling; Self-		
				empowerment, self-		
				sufficiency, financial		
				literacy training for long-		
				term housing stability;		
				Food assistance/food		
				insecurity support hubs		
				("Dunbar" and		
				"Suncoast") plus wrap-		
				around services; Need to		

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)
				make public services more accessible (e.g., telehealth, etc.); Mobile		
				healthcare (e.g., Lee Health), foodbanks, etc. to bring services to people (e.g., United Way Hub).		
6	Newspaper Ad	Non-targeted/broad community	A newspaper notice was published on June 12, 2024, and email notice sent to stakeholders, regarding a public hearing with the CAA to be held on June 18, 2024, regarding the 2024- 2028 Consolidated Plan and 2024 Annual Action Plan.	See CAA summary below.	See CAA summary below.	
7	Public Hearing	Non-targeted/broad community	In accordance with 24 CFR Part 91, a public hearing was advertised and held on June 18, 2024, where comment was solicited on the development of the 2024-2028 Consolidated Plan and 2024 Annual Action	There was general discussion about the subject grant programs and requirements. Attendees inquired about the prioritization of needs, placing a "high" priority on rental and down payment assistance, housing	All comments were accepted and considered during the development of the 2024-2028 Consolidated Plan and 2024 Annual Action Plan.	

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)
			Plan. The meeting took	counseling/legal aid,		
			place at the Community	homeless housing and		
			Action	shelter, and job		
			Agency/Neighborhood	skills/education.		
			District Committee	Attendees also discussed		
			(CAA/NDC) meeting,	the need for transitional		
			which was held at the	housing. Housing market		
			Area Agency on Aging	issues, including the		
			for Southwest Florida,	need for gap funding to		
			where 14 people	cover insurance and		
			attended, not including	property taxes, was also		
			grantee staff. The	discussed. Attendees		
			group was provided an	inquired about the		
			overview planning	eligibility of adaptive		
			process. Attendees	reuse of properties for		
			were engaged to	housing. Attendees also		
			discuss priority needs.	inquired about the 2019		
				Needs Assessment and		
				whether previous		
				geographic priorities		
				would carryover and		
				reemphasized the need		
				for public services.		
8	Newspaper Ad	Non-targeted/broad	30-Day Comment	Comments submitted	Comments pertaining to	
		community	Period. A newspaper	during the 30-day public	keeping "Public Services	
			notice was published,	comment period and	for Community	
			and email notice sent	prior to the Board of	Revitalization" as a	
			to stakeholders,	County Commissioners	strategic goal and	
			regarding the	approval on August 6,	priority need were	
			availability of the draft	2024, were limited to	considered and captured	

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)
			2024-2028	email and letter	by the new strategic goal	
			Consolidated Plan and	correspondence dated	of "Public Services and	
			2024 Annual Action	July 31, 2024, from an	Homeless/Special Needs	
			Plan for public	individual representing	Services" and new	
			comment for a period	the Pine Manor	priority need for "Public	
			of 30-days starting July	Improvement	Services", which are	
			1, 2024, and ending	Association. In summary,	intended to support	
			July 31, 2024.	the comments were	projects that address	
				threefold: (1) keep	unmet needs for public	
				"Public Services for	services. Moreover, the	
				Community	new strategic goal of	
				Revitalization" as a	"Shelter, Public Facility,	
				strategic goal; (2) keep	and Infrastructure	
				"Public Services for	Improvements" is	
				Community	intended to support	
				Revitalization" as a	projects that improve	
				priority need; and (3)	the living environment	
				maintain "Central Fort	for eligible individuals,	
				Myers" as a geographic	households, and	
				priority. The individual	neighborhoods. The	
				who submitted these	corresponding priority	
				comments also attended	needs for these new	
				the Focus Group	goals collectively	
				consultation meeting	address the	
				and CAA public hearing	revitalization needs of	
				held on May 14, 2024,	low- and moderate-	
				and June 18, 2024,	income neighborhoods	
				respectively.	in Lee County (i.e.,	
					public services, public	
					facility improvements,	

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)
					public infrastructure	
					improvements, code	
					enforcement/blight	
					elimination, and public	
					safety/crime	
					prevention). See SP-25,	
					SP-45, and AP-20.	
					Regarding geographic	
					priority, Pine Manor	
					(and Page Park) are	
					specifically listed as low-	
					and moderate-income	
					neighborhoods of focus	
					under the new "Low-	
					and-Moderate Income	
					Areas (LMA)" Target	
					Area. Many of the	
					neighborhoods listed in	
					SP-10 are in Central and	
					North Fort Myers	
					(including Pine Manor);	
					however, the new LMA	
					Target Area adds other	
					neighborhoods of focus	
					with similar needs.	
9	Public Hearing	Non-targeted/broad	In accordance with 24	No comments received	N/A	
		community	CFR Part 91, a public	by the Board of County		
			hearing was advertised	Commissioners on		
			and held on August 6,	August 6, 2024. See		

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted	URL (If applicable)
					and reasons	
			2024, where the Board	Citizen Participation		
			of County	Comments (attachment)		
			Commissioners	for meeting		
			considered the 2024-	agenda/minutes.		
			2028 Consolidated Plan			
			and 2024 Annual Action			
			Plan for approval and			
			submittal to HUD.			

Table 4 – Citizen Participation Outreach

Needs Assessment

NA-05 Overview

Needs Assessment Overview

The Needs Assessment has been completed using data, public input received during the three public meetings in February/March 2024, online survey, Focus Group consultation meeting, CAA public hearing, 30-day comment period and BoCC public hearing, agency and stakeholder input, and staff recommendations. The needs identified are mostly consistent with past needs, including more affordable housing units for households with income at or below 80 percent of the area median income. Affordable housing units may be either rental or owner occupied but making the units available at an affordable rate is the greatest present need. Projects outlined in this plan aim to address this need through the development of affordable housing units by non-profit providers and through the rehabilitation of existing units. The Needs Assessment section includes data from the Comprehensive Housing Affordability Strategy (CHAS) database and the U.S. Census Bureau's American Community Survey (ACS) database, among others.

The Needs Assessment section evaluates the demand for housing and community development assistance by the following income groups based on Area Median Income (AMI):

- Extremely Low Income (< 30% AMI or 60% of the Section 8 Very Low-Income Limits)
- Very Low Income (30%-50% AMI)
- Low Income (50%-80% AMI)

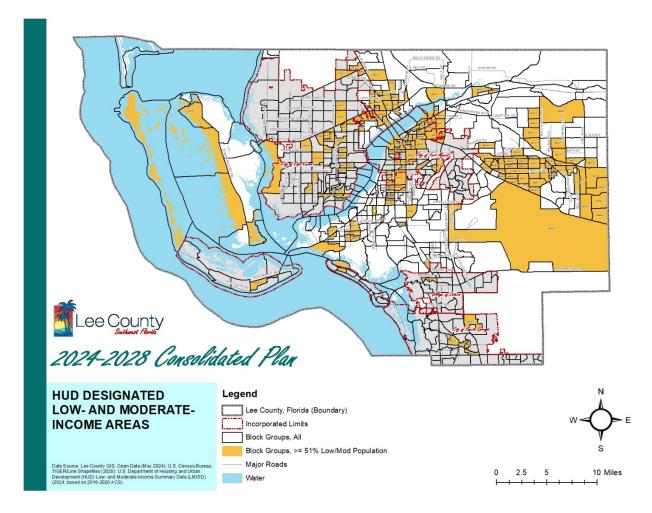
AMI is based on the 2024 HUD Income Limits Documentation System, which is outlined in **Table 5**. The Lee County CoC is within the Cape Coral-Fort Myers, FL MSA, where the AMI is \$88,800. For a family of four persons, extremely low income is \$31,200, very low income is \$46,800, and low income is \$74,900. For the Emergency Solutions Grant (ESG), extremely low income is \$28,100.

For Lee County, the threshold for a block group to be considered low- and moderate-income is 51%. **Map 1** shows the Census block groups where the population meets these thresholds. HUD is in the process of updating the 2024 LMISD based on the 2016-2022 American Community Survey data at the time of writing.

Over the next five years, the needs of unincorporated Lee County and the Urban County will be periodically reevaluated to determine if the projects outlined in this plan are meeting priority needs. If necessary, amendments to the plan will be made as necessary to ensure successful outcomes.

Income Limit	1 Person	2	3	4	5	6	7	8	
Category		Persons	Persons	Persons	Persons	Persons	Persons	Persons	
ESG/CoC	19,700	22,500	25,300	28,100	30,350	32,600	34,850	37,100	
Extremely Low									
(30%) (\$)									
Section 8	19,700	22,500	25,820	31,200	36,580	41,960	47,340	52,720	
Extremely									
Low* (\$)									
Very Low	32,750	37,450	42,100	46,800	50,550	54,300	58,050	61,800	
(50%) (\$)									
Low (80%) (\$)	52,450	59,950	67,400	74,900	80,900	86,900	92,850	98,850	
Data Source:	HUD Income Limits Documentation System (2024); *Calculated as 30/50ths (60%) of the								
	Section 8 \	/ery Low-Inc	ome Limits						

Table 5 - 2024 HUD Income Limits



Map 1 – Low- and Moderate- Income Areas

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

Summary of Housing Needs

The data presented in the next several sections provide a description of Lee County's households, both in terms of demographics and in their housing related problems. This data, combined with citizen participation, agency and stakeholder consultation, and staff recommendations, has helped to determine the overall needs for housing in unincorporated Lee County and the Urban County.

The Housing Needs Assessment includes the following sections:

- 1. Summary of Housing Needs
- 2. Demographics
- 3. Number of Households
- 4. Housing Problems 1
- 5. Housing Problems 2
- 6. Cost Burden > 30%
- 7. Cost Burden > 50%
- 8. Crowding Table (More than One Person Per Room)
- 9. Additional Housing Needs Narrative

In summary, low- and moderate-income populations in Lee County continue to experience higher rates of housing problems such as housing cost burden and overcrowding. As a result, these populations have an increased risk of homelessness. The data demonstrates the need for preservation and production of affordable housing for both renters and owners, housing assistance, and continued economic development to increase the median income of low- and moderate-income households countywide.

Demographics	Base Year: 2000 Census	2005-2010 ACS	Most Recent Year: 2018-2022 ACS	% Change from 2020
Population	290,394	394,016	485,291	23.2%
Households	128,724	165,086	199,040	20.6%
Median Household	\$40,307	\$50,014	\$69,368	38.7%
Income				

Alternate Data Source Name: 2018-2022 ACS

Data Source Comments:

2006-2010 ACS and 2018-2022 ACS, Data Tables: B01003 (Population), S1101 (Households), DP03 (Income); This data is limited to the Urban County (Lee County less Cape Coral and Fort Myers), except for median income which is calculated over the entire county.

Table 6 displays the population, number of households, and median income for the base year and most recent year, and the percentage of change over time. Of note, the Population and Household data is calculated based on HUD's Urban County grantee geography only (i.e., less Cape Coral and Fort Myers) and does not include data from the cities of Cape Coral or Fort Myers. This is consistent with how HUD's eCon Planning Suite populates the CHAS-based tables in the NA and MA screens. Median Income data is calculated for the entire county, including Cape Coral and Fort Myers. This data shows a 23.2% increase in population in the county (less Fort Myers and Cape Coral) from 394,016 people in the year 2010 to 485,291 people estimated by the 2018-2022 ACS. Similarly, the number of households increased 20.6% from 165,086 households in the year 2020 to 199,040 households estimated by the 2018-2022 ACS. Conversely, median income increased 38.7% from \$50,014 in the year 2010 to \$69,368 estimated by the 2018-2022 ACS.

Number of Households Table

	0-30%	>30-50%	>50-80%	>80-100%	>100%
	HAMFI	HAMFI	HAMFI	HAMFI	HAMFI
Total Households	20,665	20,830	34,588	20,585	90,699
Small Family Households	3,462	4,843	9,309	6,243	29,920
Large Family Households	1,100	1,440	2,632	1,588	4,230
Household contains at least one					
person 62-74 years of age	6,223	6,512	10,398	6,117	31,902
Household contains at least one					
person age 75 or older	5,793	6,113	9,143	4,762	18,681
Households with one or more					
children 6 years old or younger	1,959	2,500	3,682	2,278	5,718

Data Source: 2016-2020 CHAS Table 7 - Total Households Table

Number of Households and Types

Table 7 shows the number and type of households by HUD Adjusted Median Family Income (HAMFI).The default data source is the 2016-2020 CHAS database, developed by HUD.

The largest number of households is in the greater than 100% HAMFI group with 90,699 households.

The second largest is the >50-80% HAMFI group (34,588). Nearly 21,000 households (20,665) or approximately 11% of all households in Lee County earn below 30% of HAMFI.

Small family households are households that have a family with two to four members. The largest number of small family households is within the >100% HAMFI group (29,920). The second-largest number of small family households is within the >50-80% HAMFI group (9,309). Approximately 3,500 households (3,462) or approximately 6.4% of small family households in Lee County earn below 30% of HAMFI.

Large family households are households that have a family of five or more members. Again, the largest number of large family households is within the >100% HAMFI group (4,230). The second-largest number of large family households is within the >50-80% HAMFI group (2,362). Approximately 1,100 households or approximately 10% of large family households in Lee County earn below 30% of HAMFI.

Table 7 also provides data on households that contain at least one person considered to be elderly. The data suggest that among income groups, the largest number of households with a person 62-74 years of age is within the >100% HAMFI income group (31,902). The largest number of households with a person 75 years or older is also within the >100% HAMFI income group (18,681). Nearly 2,500 households (12,016) contain at least one person 62 years or older and earn below 30% of HAMFI.

Finally, data provided in **Table 7** shows the number of households with one or more children 6 years old or younger. Among the household income groups identified, the largest number of households with children 6 years or younger is within the 100% HAMFI income category (5,718). The second largest number of households with children 6 years old or younger is within the >50-80% HAMFI group (3,682). Nearly 2,000 households (1,959) have at least one child 6 years old or younger and earn below 30% of HAMFI.

Housing Needs Summary Tables

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

			Renter					Owner		
	0-30% AMI	>30- 50%	>50- 80%	>80- 100%	Total	0- 30%	>30- 50%	>50- 80%	>80- 100%	Total
	~~~~	AMI	AMI	AMI		AMI	AMI	AMI	AMI	
NUMBER OF HO	USEHOLD	S				•				
Substandard										
Housing -										
Lacking										
complete										
plumbing or										
kitchen										
facilities	324	145	195	164	828	224	65	104	34	427
Severely										
Overcrowded -										
With >1.51										
people per										
room (and										
complete										
kitchen and										
plumbing)	109	145	165	35	454	95	18	74	40	227
Overcrowded -										
With 1.01-1.5										
people per										
room (and										
none of the										
above										
problems)	383	420	630	160	1,593	50	89	663	304	1,106
Housing cost										
burden greater										
than 50% of										
income (and										
none of the										
above										
problems)	4,674	4,047	1,444	125	10,029	7,354	3,252	2,718	602	13,926

			Renter					Owner		
	0-30% AMI	>30- 50% AMI	>50- 80% AMI	>80- 100% AMI	Total	0- 30% AMI	>30- 50% AMI	>50- 80% AMI	>80- 100% AMI	Total
Housing cost										
burden greater										
than 30% of										
income (and										
none of the										
above										
problems)	374	2,339	4,450	1,417	8,580	1,803	3,457	5,580	2,092	12,932
Zero/negative										
Income (and										
none of the										
above										
problems)	759	0	0	0	759	2,241	0	0	0	2,241

Table 8 – Housing Problems Table

Data Source: 2016-2020 CHAS

#### **Housing Problems 1**

**Table 8** displays the number of households with housing problems by tenure and HUD Area Median Income (AMI) according to the 2016-2020 Comprehensive Housing Affordability Strategy (CHAS) data developed by HUD.

As defined by HUD, housing problems include:

- Substandard housing lacking complete kitchen or plumbing facilities
- Overcrowded or severely overcrowded households with more than one person per room, excluding bathrooms, porches, foyers, halls, or half-rooms
- Households with housing cost burden greater than 30% of income

As described below, in Lee County, more renter households experience substandard housing and overcrowding than owner households.

Substandard housing includes units without hot and cold piped water, flush toilets, bathtubs, or showers, and/or kitchen facilities that lack a sink with piped water, a range or stove, or a refrigerator. In total, there are 828 renter households and 427 owner households that live in substandard housing.

Overcrowded housing includes households having complete kitchens and bathrooms but housing more than one person per room, excluding bathrooms, porches, foyers, halls, or half-rooms. Overcrowded housing is separated into two degrees: households having between 1.01 and 1.5 persons per room and households housing more than 1.51 persons per room. In total, there are 1,593 renter households and 1,106 owner households that are overcrowded.

Cost burden is the extent to which a household pays more than 30% of their income on housing costs (i.e., >30% and >50%). For renters, housing costs include rent paid by the tenant plus utilities. For owners, housing costs include mortgage payments, taxes, insurance, and utilities. As shown in **Table 8**, among the housing problem categories, households in Lee County are most impacted by housing cost burden. More owner households experience housing cost burden than renter households. Approximately, 18,609 renters and just over 26,858 owners are experiencing some degree of housing cost burden.

			Renter					Owner		
	0-	>30-	>50-	>80-	Total	0-	>30-	>50-	>80-	Total
	30%	50%	80%	100%		30%	50%	80%	100%	
	AMI	AMI	AMI	AMI		AMI	AMI	AMI	AMI	
NUMBER OF HOUS	SEHOLD	S								
Having 1 or										
more of four										
housing										
problems	5,484	4,762	2,439	485	13,170	7,724	3,422	3,558	972	15,676
Having none of										
four housing										
problems	1,654	3,387	7,527	5,395	17,963	5,808	9,257	21,078	13,735	49,878
Household has										
negative										
income, but										
none of the										
other housing										
problems	0	0	0	0	0	0	0	0	0	0

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

Table 9 – Housing Problems 2

Data Source: 2016-2020 CHAS

#### **Housing Problems 2**

**Table 9** displays the number of households with no housing problems, one or more housing problems,and negative income by tenure and HUD Area Median Income (AMI) according to the 2016-2020Comprehensive Housing Affordability Strategy (CHAS) data developed by HUD.

Housing problems are most common among renter and owner households earning less than 30% AMI. The occurrence of housing problems decreases as income increases with households earning more than 80% have the lowest number of households with housing problems. Approximately 13,170 or 42.3% of renter households and 15,676 or 23.9% of owner households have one or more of four housing problems.

		Re	enter		Owner				
	0-30% AMI	>30- 50% AMI	>50- 80% AMI	Total	0-30% AMI	>30- 50% AMI	>50- 80% AMI	Total	
NUMBER OF HOUSEH	IOLDS								
Small Related	1,937	2,597	2,332	6,866	907	1,222	2,240	4,369	
Large Related	674	760	344	1,778	185	224	618	1,027	
Elderly	1,732	2,320	1,795	5,847	6,602	4,623	4,746	15,971	
Other	1,333	1,211	1,721	4,265	1,665	747	1,049	3,461	
Total need by	5,676	6,888	6,192	18,756	9,359	6,816	8,653	24,828	
income									

Table 10 – Cost Burden > 30%

#### 3. Cost Burden > 30%

Data Source: 2016-2020 CHAS

#### Cost Burden > 30%

**Tables 10 and 11** display the number of households with housing cost burdens greater than 30% or 50% of income by household type, tenure, and household income as Area Median Income (AMI). The default data source is the 2016-2020 Comprehensive Housing Affordability Strategy (CHAS) data developed by HUD.

Four categories of households are shown:

- Small related: Family households with two to four related members
- Large related: Family households with five or more related members
- Elderly: A households whose head, spouse, or sole member is a person at least 62 years of age
- Other: All other household types

As shown in **Table 10**, among owner households, more "Elderly" owner households experience cost burden (>30% of income) than any other household type (i.e., a total of 15,971 elderly owner households out of 24,828 total owner households). When renter households are considered, "Small Related" and "Elderly" renter households experience cost burden (>30% of income) to a similar extent. Fewer "Large Related" households experience cost burden (>30% of income) compared to other household types.

#### 4. Cost Burden > 50%

		Re	nter		Owner				
	0-30% AMI	>30- 50% AMI	>50- 80% AMI	Total	0-30% AMI	>30- 50% AMI	>50- 80% AMI	Total	
NUMBER OF HOUSEH	IOLDS								
Small Related	0	0	1,273	1,273	769	600	0	1,369	
Large Related	0	0	395	395	185	124	10	319	
Elderly	1,597	1,802	820	4,219	5,252	2,175	1,849	9,276	
Other	0	1,268	828	2,096	1,350	0	0	1,350	
Total need by	1,597	3,070	3,316	7,983	7,556	2,899	1,859	12,314	
income									

Table 11 – Cost Burden > 50%

Data Source: 2016-2020 CHAS

#### Cost Burden > 50%

As shown in **Table 11**, among owner households, more "Elderly" households experience severe cost burden (>50% of income) than any other household type (i.e., a total of 9,276 elderly owner households out of 12,314 total owner households). When renter households are considered, more "Elderly" households also experience severe cost burden (>50% of income) than any other household type (i.e., 4,219 elderly renter households out of 7,983 total renter households). Fewer "Large Related" households experience severe cost burden (>50% of income) compared to other household types.

#### 5. Crowding (More than one person per room)

	Renter					Owner				
	0-	>30-	>50-	>80-	Total	0-	>30-	>50-	>80-	Total
	30%	50%	80%	100%		30%	50%	80%	100%	
	AMI	AMI	AMI	AMI		AMI	AMI	AMI	AMI	
NUMBER OF HOUSEHOLDS										
Single family households	458	510	780	135	1,883	145	97	647	309	1,198
Multiple, unrelated family										
households	54	65	20	60	199	0	10	90	39	139
Other, non-family households	0	0	35	0	35	0	0	0	0	0
Total need by income	512	575	835	195	2,117	145	107	737	348	1,337

Table 12 – Crowding Information – 1/2

Data Source:

2016-2020 CHAS

#### Crowding

**Table 12** displays the number of households that are overcrowded, defined as households with more than one person per room, excluding bathrooms, porches, foyers, halls, or half-rooms. The data is displayed by household type, tenure, and household income as Area Median Income (AMI). The default data source is the 2016-2020 Comprehensive Housing Affordability Strategy (CHAS) data developed by HUD.

As shown in **Table 12**, overcrowding is most prevalent in renter households, particularly single-family households earning less than 80% AMI. Approximately 2,117 renter households experience overcrowding, with 1,922 renter households (90.8%) earning less than 80%. Fewer owner households experience overcrowding, but of those that do, nearly three quarters (989 or 74%) earn less than 80% AMI group. Overcrowded Households with children were estimated as shown in **Table 13**.

		Rer	nter		Owner				
	0-30%	>30-	>50-	Total	0-	>30-	>50-	Total	
	AMI	50%	80%		30%	50%	80%		
		AMI	AMI		AMI	AMI	AMI		
Households with Children									
Present	110	123	179	412	31	23	158	212	

Table 13 – Crowding Information – 2/2

Data Source Comments: 2016-2020 CHAS; 2018-2022 ACS; Estimates are based on the percentage of occupied housing units with children under 18 years (21.4%) applied to the Crowding Information (see preceding table).

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

A significant housing cost burden is associated with an increased risk of homelessness. Non-homeless elderly owner and small-related renter households have a significant cost burden when compared to other household types. Additionally, there are a number of "Other" households which may be comprised of single persons in Lee County. According to the 2016-2020 CHAS, 7,726 "Other" households have a cost burden greater than 30% of income and 3,446 "Other" households have a cost burden greater than 50% of income.

According to a recent homeless census, or annual Point-in-Time (PIT) count survey conducted in 2023, there are 862 homeless persons in Lee County of which 670 (77.7%) are in households without children and need housing assistance.

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

The lead agency for the Continuum of Care (CoC), Lee County Human and Veteran Services, estimated a Domestic Abuse Survivor population of 56 persons, a Substance Abuse Survivor population of 120 persons and a Mental Health Disorder population of 158 persons in the 2023 PIT analysis. The local domestic violence service provider, Abuse Counseling and Treatment (ACT), provides 96 emergency shelter beds for persons who are fleeing domestic violence, of which 73 beds were located in Fort Myers and 23 beds were located in Cape Coral.

Input from consultations with Lee County's Affordable Housing Committee, Local Government partners and residents confirm that Lee County's most common housing issue is affordability and lack of affordable housing in the county. Comments also indicated a lack of understanding about fair housing practices and programs, and landlords not participating in the rental subsidy programs.

#### What are the most common housing problems?

The most common housing problem reflected in the CHAS data is cost burden. HUD defines housing affordability in terms of the proportion of household income that is used to pay housing costs. Housing is "affordable" if no more than 30 percent of a household's monthly income is needed for rent, mortgage payments and utilities. When the proportion of household income needed to pay housing costs exceeds 30 percent, a household is considered "cost burdened." Severe cost burden is defined as when gross housing costs, including utilities, exceed 50 percent of the households' gross income. In Lee County, nearly 8,000 renter-households and nearly 12,500 owner-households in Lee County (apart from the cities of Cape Coral and Fort Myers) are experiencing housing cost burden greater than 50% of the households' gross income. Likewise, more than 18,500 renter-households and over 24,500 owner-households in Lee County (apart from the cities of Cape Coral and Fort Myers) pay more than 30% of household income toward housing expenses.

Other housing problems, defined by HUD as lacking complete plumbing or kitchen facilities, overcrowded with more than 1.51 persons per room, or overcrowded with 1.01-1.5 persons per room affect far less households in Lee County. According to the 2018-2022 American Community Survey, 0.8% of the occupied housing units in all of Lee County did not have telephone service of any kind (i.e., cell phone, landline, or other phone device); 0.2% percent lacked complete plumbing facilities; and 0.8% of occupied housing units lacked complete kitchen facilities. CHAS data shows that a total of 18,846 households are affected by one of the three housing problems specified above, which is still less than those households affected by severe cost burden.

Input from consultations with Lee County's Affordable Housing Committee, Local Government partners and residents confirm that Lee County's most common housing issue is affordability and lack of affordable housing in the county. Comments also indicated a lack of understanding about fair housing practices and programs, and landlords not participating in the rental subsidy programs.

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

Households earning less than 80% AMI are experiencing higher rates of housing problems than households with higher incomes. More owners are experiencing cost burden and have one or more of four housing problems than renters. Among owner and renter households, those with an income less than 50% AMI generally experience greater housing problems. Among households earning less than 30% AMI, owners experience housing issues at a rate greater than that of renters. Comparisons of cost burden by type of household show that while large, related renter and owner households are less affected by cost burden, small related, elderly and other household types are more affected. Single family households are more affected by crowding than households with multiple, unrelated members or other non-family households; however, renter households are more significantly affected by crowding than owner households.

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

With rising housing costs in the State of Florida, maintaining stable housing is difficult for many households. Individuals and families who are at risk of homelessness, especially those with extremely low-income, are most in need of monetary assistance to prevent homelessness. Job loss, reduced work hours, loss of household income (i.e. partner leaves, decreased benefits), unexpected large expenses (car repair, medical emergency), and insufficient savings are all circumstances that can cause a low-income family to fall behind on their rent. In addition to insufficient income, families are often "doubled up." These families may be living with another family that is renting a unit and violating the terms on the lease, which puts them in jeopardy of losing their housing.

For those formerly homeless families and individuals who are receiving rapid re-housing assistance and are nearing the termination of that assistance, the greatest need is employment and affordable rental housing. Homeless Management Information System (HMIS) data indicates that only 47% of individuals and families who receive assistance through the CoC exit emergency shelter, transitional housing and rapid re-housing programs exited to a permanent housing destination during fiscal year 2023. For formerly homeless individuals and families to maintain housing after rental assistance ends, the household must increase income and locate a housing unit within their range of affordability. Often tenants are able to increase income, but unable to locate an affordable rental unit, therefore returning to homeless status. In FY 2023, 7% of persons who exited from emergency shelter, transitional housing and rapid re-housing programs returned to homelessness within 6 months.

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

Lee County does not currently provide estimates of the at-risk population(s). The CoC Strategic Plan includes a goal to gather and analyze data to identify risk factors for homelessness. Such data would likely include seasonal, racial, ethnic, industrial/occupational and geographic elements, and will be used to develop a local definition of "at risk".

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

As previously stated, rising housing costs in the State of Florida can make maintaining stable housing difficult for many households. Job loss, reduced work hours, loss of household income (i.e. partner leaves, decreased benefits), unexpected large expenses (car repair, medical emergency), and insufficient savings are all circumstances that have been linked with housing instability and increased risk of homelessness. The CoC would like to identify other characteristics that increase risk of homelessness by regularly reviewing seasonal, racial, ethnic, industrial/occupational and geographic data.

Citizen comments indicated a lack of homeless shelters and beds and indicated the lack of affordable housing is increasing homelessness.

#### Discussion

Since 2010, the population, number of households and median income has increased in Lee County. Nearly 40% of the County's households (less Fort Myers and Cape Coral) earn less than 80% HAMFI and approximately 10.4% of the County's households earn less than 30% HAMFI. Low- and moderateincome populations continue to experience higher rates of housing problems, such as housing cost burden and overcrowding. As a result, these populations have an increased risk of homelessness.

#### **CDBG-DR Housing Funds and Programs**

The Community Development Block Grant Disaster Recovery (CDBG-DR) program provides communities impacted by disasters with resources to address a wide range of disaster-related needs. Those needs include preserving affordable housing opportunities, assisting in recovery for property owners, restoration of critical public facilities/infrastructure, mitigation through investment, continuation of public services and planning for future resiliency. Lee County completed a disaster impact and unmet needs assessment to identify the impacts, long-term needs, and priorities for more than \$1.1 billion of Community Development Block Grant-Disaster Recovery (CDBG-DR) funding allocated as a result of the 2022 Hurricane Ian event.

According to the 2023 Lee County CDBG-DR Action Plan, Amendment 4, the unmet needs analysis identified a total housing unmet recovery need of \$4,598,352,445. FEMA real property damage estimates indicate that there are approximately 18,473 owner-occupied units and 4,655 renter-occupied units that suffered major-high or severe damage. Insurance data indicates that there are an estimated 49.08 percent of homeowners without insurance. By adding the number of renter and owner-occupied units, then dividing by the percent estimated to be uninsured, the County estimates that approximately 11,351 households may need some assistance to fully recover from Hurricane Ian. The County further estimates, based on the overall LMI population, that 4,742 (41.78 percent) of these households may be income qualified for CDBG-DR programs. Housing needs will receive \$641,552,930 in CDBG-DR funds, or 57% of all CDBG-DR funds allocated to Lee County. With that money the County will address and support affordable multifamily housing development, affordable single family housing development, individual housing rehabilitation and mitigation, home purchase assistance and voluntary residential acquisition programs.

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

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

#### Introduction

In this section, disproportionately greater need exists when the percentage of persons in a category of need who are members of a particular racial or ethnic group is at least 10 percentage points higher than the percentage of persons in category as a whole. A summary of these findings is at the end of each section.

Again, as defined by HUD, housing problems include:

- Substandard housing lacking complete plumbing facilities
- Substandard housing lacking complete kitchen facilities
- Overcrowded households with 1.01 to 1.5 people per room, excluding bathrooms, porches, foyers, halls, or half-rooms
- Households with housing cost burden greater than 30% of income

The Disproportionately Greater Needs: Housing Problems section covers the following:

- Introduction
- Disproportionately Greater Need—Housing Problems 0-30% Area Median Income (AMI)
- Disproportionately Greater Need—Housing Problems 30-50% AMI
- Disproportionately Greater Need—Housing Problems 50-80% AMI
- Disproportionately Greater Need—Housing Problems 80-100% AMI
- Discussion

This section has four tables that capture the number of housing problems by income, race, and ethnicity. Each table provides data for a different income level (0–30%, 30–50%, 50–80%, and 80–100% AMI). The default data source is the 2016-2020 Comprehensive Housing Affordability Strategy (CHAS) data developed by HUD.

#### 0%-30% of Area Median Income

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	12,409	1,757	2,827
White	7,977	1,303	2,438
Black / African American	1,005	105	54
Asian	154	35	20
American Indian, Alaska Native	15	0	0
Pacific Islander	0	0	0
Hispanic	3,079	296	308

Table 14 - Disproportionally Greater Need 0 - 30% AMI

Data Source: 2016-2020 CHAS

*The four housing problems are:

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

#### 0%-30% of Area Median Income

**Table 14** shows housing problems by racial and ethnic group for households in the 0-30% AMI group. Of all the subject income groups, households in the 0-30% AMI group have the highest percentage of households with one or more housing problems. Approximately 73% of households in this income group have at least one housing problem.

When considering race, 68.1% of White households and 86.3% of Black/African American households in the 0-30% AMI group have one or more housing problems. Nearly 74% (73.7%) of Asian households and 100% of American Indian/Alaska Native households in the 0-30% AMI group have one or more housing problems. When considering ethnicity, 83.6% of Hispanic households in the 0-30% AMI group have one or more housing problems. Compared to the overall jurisdiction, Black/African American, American Indian/Alaska Native, and Hispanic households earning 0-30% AMI have a disproportionate need for housing assistance.

#### 30%-50% of Area Median Income

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems	
Jurisdiction as a whole	12,555	4,382	0	
White	8,819	3,512	0	
Black / African American	948	135	0	
Asian	60	30	0	
American Indian, Alaska Native	0	0	0	
Pacific Islander	0	0	0	
Hispanic	2,645	665	0	

Table 15 - Disproportionally Greater Need 30 - 50% AMI

Data Source: 2016-2020 CHAS

*The four housing problems are:

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

#### 30%-50% of Area Median Income

As shown in **Table 15** shows housing problems by racial and ethnic group for households in the 30-50% AMI group. Of all the subject income groups, households in the 30-50% AMI group have the second highest percentage of households with one or more housing problems. Approximately 74.1% of households in this income group have at least one housing problem.

When considering race, 71.5% of White households and 87.5% of Black/African American households in the 30-50% AMI group have one or more housing problems. Over 65% (66.7%) of Asian households in the 30-50% AMI group have one or more housing problems. When considering ethnicity, 79.9% of Hispanic households in the 30-50% AMI group have one or more housing problems. Compared to the overall jurisdiction, Black/African American and Hispanic households earning 30-50% AMI have a disproportionate need for housing assistance.

#### 50%-80% of Area Median Income

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	15,309	14,187	0
White	11,208	11,131	0
Black / African American	1,282	500	0
Asian	170	95	0
American Indian, Alaska Native	10	25	0
Pacific Islander	0	0	0
Hispanic	2,513	2,249	0

Table 16 - Disproportionally Greater Need 50 - 80% AMI

Data Source: 2016-2020 CHAS

*The four housing problems are:

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

#### 50%-80% of Area Median Income

As shown in **Table 16**, housing problems by racial and ethnic group for households in the 50-80% AMI group. Of all the subject income groups, households in the 50-80% AMI group have the third highest percentage of households with one or more housing problems. Approximately 51.9% of households in this income group have at least one housing problem.

When considering race, 50.2% of White households and 71.9% of Black/African American households in the 50-80% AMI group have one or more housing problems. Just over 60% (64.2%) of Asian households and 28.6% of American Indian/Alaska Native households in the 50-80% AMI group have one or more housing problems. When considering ethnicity, 52.8% of Hispanic households in the 50-80% AMI group have one or more housing problems. Compared to the overall jurisdiction, Black/African American, Asian and Hispanic households earning 50-80% AMI have a disproportionate need for housing assistance.

#### 80%-100% of Area Median Income

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	4,921	11,945	0
White	3,758	9,825	0
Black / African American	264	454	0
Asian	54	69	0
American Indian, Alaska Native	0	23	0
Pacific Islander	0	0	0
Hispanic	803	1,367	0

Table 17 - Disproportionally Greater Need 80 - 100% AMI

Data Source: 2016-2020 CHAS

*The four housing problems are:

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

#### 80%-100% of Area Median Income

**Table 17** shows housing problems by racial and ethnic group for households in the 80-100% AMI group. Of all the subject income groups, households in the 80-100% AMI group have the fourth highest percentage of households with one or more housing problems. Approximately 29.2% of households in this income group have at least one housing problem.

When considering race, 27.7% of White households and 36.8% of Black/African American households in the 80-100% AMI group have one or more housing problems. Just over 40% (43.9%) of Asian households and 0% of American Indian/Alaska Native households in the 80-100% AMI group have one or more housing problems. When considering ethnicity, 37% of Hispanic households in the 80-100% AMI group have one or more housing problems. Compared to the overall jurisdiction, Black/African American, Asian and Hispanic households earning 80-100% AMI have a disproportionate need for housing assistance.

#### Discussion

For the 0%-30% income group, Black/African American, American Indian/Alaska Native and Hispanic population groups have a disproportionate percent of households with one or more of the four housing problems. Black/African American households have a disproportionate need by approximately 13%, American Indian/Alaska Native households have a disproportionate need by approximately 17% and Hispanic households have a disproportionate need by approximately 17% and Hispanic households have a disproportionate need by approximately 10%. For the 30%-50% income group, Black/African American households have a disproportionate need by approximately 13% while

Hispanic households have a disproportionate need by approximately 6%. For the 50%-80% income group, Black/African American households have a disproportionate need by approximately 20%, Asian Households have a disproportionate need by approximately 12% while Hispanic households have a disproportionate need by approximately 1%. Among households that earn between 80%-100% of the area median income, Black/African American households have a disproportionate need by approximately 8%, Asian households have a disproportionate need by approximately 15% while Hispanic households have a disproportionate need by approximately 7%.

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

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

#### Introduction

In this section, disproportionately greater need exists when the percentage of persons in a category of need who are members of a particular racial or ethnic group is at least 10 percentage points higher than the percentage of persons in category as a whole. A summary of these findings is at the end of each section.

Again, as defined by HUD, severe housing problems include:

- Severely overcrowded households with more than 1.5 persons per room, excluding bathrooms, porches, foyers, halls, or half-rooms
- Households with severe housing cost burden greater than 50% of income

Severe Housing Problems*	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems	
Jurisdiction as a whole	11,129	3,030	2,827	
White	7,022	2,270	2,438	
Black / African American	955	155	54	
Asian	134	55	20	
American Indian, Alaska Native	15	0	0	
Pacific Islander	0	0	0	
Hispanic	2,864	506	308	

#### 0%-30% of Area Median Income

Table 18 – Severe Housing Problems 0 - 30% AMI

Data Source: 2016-2020 CHAS

*The four severe housing problems are:

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

#### 0%-30% of Area Median Income

**Table 18** shows severe housing problems by racial and ethnic group for households in the 0-30% AMI group. Of all the subject income groups, households in the 0-30% AMI group have the highest percentage of households with one or more severe housing problems. Approximately 65.5% of households in this income group have at least one severe housing problem.

When considering race, 59.9% of White households and 82% of Black/African American households in the 0-30% AMI group have one or more severe housing problems. An estimated 64.1% of Asian households and 100% of American Indian/Alaska Native households in the 0-30% AMI group have one or more severe housing problems. When considering ethnicity, 77.9% of Hispanic households in the 0-30% AMI group have one or more severe housing problems. Compared to the overall jurisdiction, Black/African American, American Indian/Alaska Native and Hispanic households earning 0-30% AMI have a disproportionate need for housing assistance.

Severe Housing Problems*	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	7,388	9,542	0
White	4,996	7,311	0
Black / African American	615	468	0
Asian	60	35	0
American Indian, Alaska Native	0	0	0
Pacific Islander	0	0	0
Hispanic	1,645	1,679	0

#### 30%-50% of Area Median Income

Table 19 – Severe Housing Problems 30 - 50% AMI

Data Source: 2016-2020 CHAS

*The four severe housing problems are:

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

#### 30%-50% of Area Median Income

**Table 19** shows severe housing problems by racial and ethnic group for households in the 30-50% AMI group. Of all the subject income groups, households in the 30-50% AMI group have the second highest percentage of households with one or more severe housing problems. Approximately 43.6% of households in this income group have at least one severe housing problem.

When considering race, 40.6% of White households and 56.8% of Black/African American households in the 30-50% AMI group have one or more severe housing problems. An estimated 63.2% of Asian households in the 30-50% AMI group have one or more severe housing problems. When considering ethnicity, 49.5% of Hispanic households in the 30-50% AMI group have one or more severe housing problems. Compared to the overall jurisdiction, Black/African American, Asian and Hispanic households earning 30-50% AMI have a disproportionate need for housing assistance.

#### 50%-80% of Area Median Income

Severe Housing Problems*	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems	
Jurisdiction as a whole	5,673	23,862	0	
White	4,193	18,167	0	
Black / African American	384	1,394	0	
Asian	95	170	0	
American Indian, Alaska Native	0	35	0	
Pacific Islander	0	0	0	
Hispanic	917	3,838	0	

Table 20 – Severe Housing Problems 50 - 80% AMI

Data Source: 2016-2020 CHAS

*The four severe housing problems are:

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

#### 50%-80% of Area Median Income

**Table 20** shows severe housing problems by racial and ethnic group for households in the 50-80% AMI group. Of all the subject income groups, households in the 50-80% AMI group have the third highest percentage of households with one or more severe housing problems. Approximately 19.2% of households in this income group have at least one severe housing problem.

When considering race, 18.6% of White households and 21.6% of Black/African American households in the 50-80% AMI group have one or more severe housing problems. An estimated 35.8% of Asian households and 0% of American Indian, Alaska Native households in the 50-80% AMI group have one or more severe housing problems. When considering ethnicity, 19.3% of Hispanic households in the 50-80% AMI group have one or more severe housing problems. Compared to the overall jurisdiction, Black/African American, Asian and Hispanic households earning 50-80% AMI have a disproportionate need for housing assistance.

#### 80%-100% of Area Median Income

Severe Housing Problems*	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems	
Jurisdiction as a whole	1,796	15,060	0	
White	1,228	12,360	0	
Black / African American	95	623	0	
Asian	14	109	0	
American Indian, Alaska Native	0	23	0	
Pacific Islander	0	0	0	
Hispanic	463	1,717	0	

Table 21 – Severe Housing Problems 80 - 100% AMI

Data Source: 2016-2020 CHAS

*The four severe housing problems are:

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

#### 80%-100% of Area Median Income

**Table 21** shows severe housing problems by racial and ethnic group for households in the 80-100% AMI group. Of all the subject income groups, households in the 80-100% AMI group have the fourth highest percentage of households with one or more severe housing problems. Approximately 10.7% of households in this income group have at least one severe housing problem.

When considering race, 9% of White households and 13.2% of Black/African American households in the 80-100% AMI group have one or more severe housing problems. An estimated 11.4% of Asian households and 0% of American Indian/Alaska Native households in the 80-100% AMI group have one or more severe housing problems. When considering ethnicity, approximately 18.7% of Hispanic households in the 80-100% AMI group have one or more severe housing problems. Compared to the overall jurisdiction, Black/African American, Asian and Hispanic households earning 80-100% AMI have a disproportionate need for housing assistance.

#### Discussion

For the 0%-30% percent income group, Black/African American, American Indian, Alaska Native and Hispanic population groups have a disproportionate percent of households with one or more of the four severe housing problems by 27%, 45% and 13% respectively. For the 30%-50% income group,

Black/African American households have a disproportionate need by approximately 14%, Asian households by 21% while Hispanic households have a disproportionate need by approximately 7%. For the 50%-80% income group, Black/African American households have a disproportionate need by approximately 3%, Asian Households have a disproportionate need by approximately 16% while Hispanic households have a disproportionate need by approximately 1.1%. Among households that earn between 80%-100% of the area median income, Black/African American households have a disproportionate need by approximately 1.1%. Among households have a disproportionate need by approximately 1.1%. Among households have a disproportionate need by approximately 1.1%. Among households have a disproportionate need by approximately 1.1%. Among households have a disproportionate need by approximately 1.1%. Among households have a disproportionate need by approximately 1.1%. Among households have a disproportionate need by approximately 1.1%. Among households have a disproportionate need by approximately 1.1%. Among households have a disproportionate need by approximately 1.1%. Among households have a disproportionate need by approximately 4%, Asian households have a disproportionate need by approximately 3%.

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

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

#### Introduction

In this section, disproportionately greater need exists when the percentage of persons in a category of need who are members of a particular racial or ethnic group is at least 10 percentage points higher than the percentage of persons in category as a whole. A summary of these findings is at the end of each section.

**Table 22** displays cost burden information for Lee County and each racial and ethnic group, including no cost burden (less than 30%), cost burden (30-50%), severe cost burden (more than 50%), and no/negative income. The default data source for this data is the 2016-2020 Comprehensive Housing Affordability Strategy (CHAS) data developed by HUD.

Housing Cost Burden	<=30%	30-50%	>50%	No / negative income (not computed)
Jurisdiction as a whole	116,417	26,955	24,269	3,253
White	97,042	20,765	17,942	2,583
Black / African				
American	4,463	1,676	1,529	169
Asian	1,195	265	308	20
American Indian,				
Alaska Native	178	10	15	0
Pacific Islander	0	0	0	0
Hispanic	12,534	3,986	4,247	468

#### **Housing Cost Burden**

Table 22 – Greater Need: Housing Cost Burdens AMI

Data Source: 2016-2020 CHAS

#### **Housing Cost Burden**

As the data in **Table 22** suggests, a large number of households are cost burdened within their current housing situation. An estimated 15.7% of all households experience a cost burden of 30-50% of income, and an estimated 14.2% of all households experience a cost burden of >50% of income. Black/African American (21.4%), Asian (20.4%), and Hispanic (18.8%) households are disproportionally affected by cost burden between 30-50% of income. Likewise, Black/African American (19.5%), Asian (17.2%), and

Hispanic (20%) households are disproportionally affected by cost burden more than 50% of income (i.e., severe cost burden). These percentages underscore Lee County's need for affordable housing options and increased economic opportunity for persons with low- and moderate-income.

#### Discussion

Throughout the public participation and consultation process for the development of this plan, housing cost and access to affordable housing was identified as a significant issue within the county. In a public survey conducted in May 2024, the most pressing issues identified in the county were housing affordability for renters (68%), housing affordability for owners (59%), affordable rental housing for veterans (59%), affordable ownership housing for veterans (58%) and housing for the senior/elderly population (ages 62+) (57%).

Public input received suggested that Black/African American and Hispanic residents were most impacted by high housing costs. Data provided indicates that Asian households also experience severely high-cost burden at a disproportionate rate, when compared to the whole. Over 17 percent of Asian households are severely cost burdened, while only 14.2 percent of the total population is severely cost burdened. American Indian, Alaksa Native households experience the lowest cost burden, with 87.7 percent of those households have a lower than or equal to 30 percent housing cost burden.

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

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

As indicated in the previous sections, several racial or ethnic groups were identified as having a disproportionately greater housing need in comparison to income group as a whole. As detailed below, these include the Black/African American, Asian, American Indian/Alaska Native, and Hispanic groups.

The Black/African American group experiences a disproportionately greater need in terms of the following:

- Severe housing problems in the 0-30% AMI group (82% versus 65.5% as a whole)
- Severe housing problems in the 30-50% AMI group (56.8% versus 43.6% as a whole)
- Severe housing problems in the 50-80% AMI group (21.6% versus 19.2% as a whole)
- Severe housing problems in the 80-100% AMI group (13.2% versus 10.7% as a whole)
- Housing Cost Burden in the 30-50 AMI group (21.4% versus 15.7% as a whole)
- Housing Cost Burden in the >50% AMI group (19.5% versus 14.2% as a whole)

The Asian group experiences a disproportionately greater need in terms of the following:

- Severe housing problems in the 30-50% AMI group (63.2% versus 43.6% as a whole)
- Severe housing problems in the 50-80% AMI group (35.8% versus 19.2% as a whole)
- Severe housing problems in the 80-100% AMI group (11.4% versus 10.7% as a whole)
- Housing Cost Burden in the 30-50 AMI group (20.4% versus 15.7% as a whole)
- Housing Cost Burden in the >50% AMI group (17.2% versus 14.2% as a whole)

The American Indian/Alaska Native group experiences a disproportionately greater need in terms of the following:

- Severe housing problems in the 0-30% AMI group (100% versus 65.5% as a whole)
- Housing Cost Burden in the >50% AMI group (87.7% versus 68.1% as a whole)

The Hispanic group experiences a disproportionately greater need in terms of the following:

- Severe housing problems in the 0-30% AMI group (77.9% versus 65.5% as a whole)
- Severe housing problems in the 30-50% AMI group (49.5% versus 43.6% as a whole)
- Severe housing problems in the 50-80% AMI group (19.3% versus 19.2% as a whole)
- Severe housing problems in the 80-100% AMI group (18.7% versus 10.7% as a whole)
- Housing Cost Burden in the 30-50 AMI group (18.8% versus 15.7% as a whole)
- Housing Cost Burden in the >50% AMI group (20% versus 14.2% as a whole)

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

The data reported represents the areas of need.

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

The racial and ethnic groups identified in the CHAS data are represented throughout the county. A map showing the racial and ethnic concentrations in Lee County is provided in the attachments. Overall, Lee County has become more diverse since 2010 and 2020, because of increases in racial and ethnic minority population and decreases in the percentage of White population. After White residents, the largest racial/ethnic group in Lee County is Hispanic.

The 2018-2022 American Community Survey indicated a major shift in population composition from the previous 5-year ACS estimate (2013-2017 ACS) with 64.4% identifying as White alone (not Hispanic) and the Hispanic (any race) population comprising 23.1 percent of the County's total population. In 2017, 68.4 percent of the population identified as White (not Hispanic), and Hispanic (any race) populations comprised 20.2 percent of the County's total population. The County's population that is Hispanic or Latino increased from 141,544 persons to 178,802 persons from 2017 and 2022.

Over 32% of all Lee County Blacks or African Americans alone live in the City of Fort Myers. Hispanics account for 11.65% of the County's population.

Cape Coral and Fort Myers, the largest cities in the county have significant Hispanic concentrations, with 38.45% of the County's Hispanic population residing in these areas. Fort Myers also has a large concentration of Black population with 21.9% percent of the City's population versus the countywide percentage of 7.7%.

## NA-35 Public Housing - 91.205(b)

#### Introduction

The Consolidated Plan must provide a concise summary of the needs of public housing residents. Information is collected through consultations with the public housing agency or agencies located within the jurisdiction's boundaries. The Public Housing Needs Assessment contains the following subsections:

- Introduction
- Totals in Use
- Characteristics of Residents
- Race of Residents
- Ethnicity of Residents
- Additional Narrative

The Housing Authority of the City of Fort Myers (HACFM) and Lee County Housing Authority (LCHA) are responsible for administering public housing and other publicly assisted housing programs within Lee County. The identified public housing inventory includes approximately 1,362 units as identified by the HACFM and additional scattered sites throughout the county. Among other assistance, the LCHA also administers the Section 8 rental assistance program that provides rental assistance to qualified persons based on income. The amount paid by qualified persons for rent and utilities does not exceed 30% of income, and income must be within HUD's guidelines for household size. Housing units must pass the Housing Quality Standards Inspection per guidelines established by HUD. This program has a waiting list, which is currently closed.

Data in this section covers several types of housing programs and vouchers that are defined as follows:

- Certificate: The total number of Section 8 certificates administered by the Public Housing Authority (PHA).
- Mod-Rehab: The total number of units in developments that were funded under the moderate rehabilitation program administered locally by PHAs.
- Public Housing: The total number of units in developments operated by the PHAs within the jurisdiction.
- Total: The total number of Section 8 vouchers administered by the PHA (project based plus tenant based).
- Project Based: The total number of project-based Section 8 vouchers administered by the PHA.
- Tenant Based: The total number of tenant-based Section 8 vouchers administered by the PHA.
- Special Purpose Veterans Affairs Supportive Housing: The HUD–Veterans Affairs Supportive Housing program combines Housing Choice Voucher rental assistance for homeless veterans with case management and clinical services provided by the U.S. Department of Veterans Affairs (VA).

- Special Purpose Family Unification Program: Family Unification Program funding is allocated through a competitive process; therefore, not all PHAs administer the program.
- Special Purpose Disabled: In this context, disabled includes non-elderly disabled, mainstream 1year, mainstream 5-year, and nursing home transition.

#### **Totals in Use**

	Program Type												
	Certificate	Mod-	Public	Vouche	Vouchers								
		Rehab	Housing	Total	Project	Tenant	Specia	l Purpose Vou	cher				
					-based	-based	Veterans Affairs Supportive Housing	Family Unification Program	Disabled *				
# of units vouchers													
in use	0	0	786	2,079	11	1,970	70	22	0				

Table 23 - Public Housing by Program Type

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

Data Source: PIC (PIH Information Center)

#### **Totals In Use**

**Table 23** displays the number of vouchers and units "in use" by public housing program type. Accordingto the PIH Information Center (PIC), there are 786 public housing units, administered by the CHA.Tenant-based vouchers are by far the most used program, with 1,970 vouchers currently in use.According to PIC, there are 11 project-based vouchers and 92 special purpose vouchers in use, of which70 are Veteran Affairs Supportive Housing vouchers and 22 are Family Unification Program vouchers.

#### **Characteristics of Residents**

	Program Type												
	Certificate	Mod-	Public	Vouche	rs								
		Rehab	Housing	Total	Project	Tenant	-	ose Voucher					
					-based	-based	Veterans Affairs Supportive Housing	Family Unification Program					
# Homeless at													
admission	0	0	9	49	0	3	46	0					
# of Elderly													
Program													
Participants													
(>62)	0	0	331	469	1	453	15	0					
# of Disabled													
Families	0	0	119	539	2	489	44	0					
# of Families													
requesting													
accessibility													
features	0	0	786	2,079	11	1,970	70	22					
# of HIV/AIDS													
program													
participants	0	0	0	0	0	0	0	0					
# of DV victims	0	0	0	0	0	0	0	0					

Table 24 – Characteristics of Public Housing Residents by Program Type

Data Source:

PIC (PIH Information Center)

#### **Characteristics of Residents**

**Table 24** displays the characteristics of public housing residents by public housing program type. Elderly program participants comprise 26.6% of publicly assisted residents and many publicly assisted families are disabled (9.6%). These data show that most families in need of housing assistance/vouchers are also disabled or in need of housing accessibility features. No HIV/AIDS participants or victims of domestic violence were counted. According to PIC, there are 14 project-based vouchers and 197 special purpose vouchers in use, of which 175 are Veteran Affairs Supportive Housing vouchers and 22 are Family Unification Program vouchers, utilized by the various different characteristic populations.

#### **Race of Residents**

Program Type													
Race	ce Certificate Mod- Public Vouchers												
		Rehab	Housing	Total	Project	Tenant	Specia	al Purpose Voucher					
					-based	-based	Veterans Affairs Supportive	Family Unification Program	Disabled *				
White	0	0	340	1,161	2	1,083	Housing 60	10	0				
Black/African				,		,							
American	0	0	445	911	9	881	10	11	0				
Asian	0	0	1	4	0	3	0	1	0				
American Indian/Alaska													
Native	0	0	0	3	0	3	0	0	0				
Pacific Islander	0	0	0	0	0	0	0	0	0				
Other	0	0	0	0	0	0	0	0	0				

Table 25 – Race of Public Housing Residents by Program Type

Data Source:

PIC (PIH Information Center)

#### **Race of Residents**

**Table 25** displays the racial composition of residents for each public housing program. The data in Table 25 show that most public housing residents in the Lee County are Black/African American (56.6%). In contrast, vouchers are well-utilized by both White (55.8%) and Black/African American (43.8%) residents. Less than 1% of public housing and vouchers are utilized by residents of another race.

#### **Ethnicity of Residents**

	Program Type													
Ethnicity	Certificate	Mod-	Public	Vouche	rs									
		Rehab	Housing	Total	Project	Tenant	Specia	l Purpose Vou	cher					
					-based	-based	Veterans Affairs Supportive Housing	Family Unification Program	Disabled *					
Hispanic	0	0	180	527	1	519	2	4	0					
Not														
Hispanic	0	0	606	1,552	10	1,451	68	18	0					

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

Table 26 – Ethnicity of Public Housing Residents by Program Type

Data Source:

PIC (PIH Information Center)

#### **Ethnicity of Residents**

**Table 26** displays the ethnic composition of residents for each assisted housing program. The ethnic groups defined as "Hispanic" utilize 22.9% of public housing units and 25.3% vouchers. The majority of publicly assisted residents are "Not Hispanic".

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

All publicly assisted residents (public housing or voucher) need affordable, accessible units. Approximately 15% of the applicants on the waiting list are in need of accessible Section 504 units. Most needs identified were for physical disabilities.

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

As of May 2024, there were 2,398 households on the Housing Choice Voucher waiting list. Those applicants consisted of families, elderly, and persons with disabilities, as well as other special populations. The waiting list for Public Housing had 2,768 applicants, and the waiting list for project-based housing was 3,224 applications. Those on the waiting list, residents of public housing, and Housing Choice vouchers have immediate need for education, employment skills, transportation, financial literacy, and low-cost childcare.

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

The needs of persons in public housing and housing choice voucher holders do not differ significantly from the population at large. Housing affordability/availability, transportation, and childcare/senior care were consistently identified as needs during Lee County's public participation process.

#### Discussion

The HACFM and LCHA are responsible for administering public housing and other publicly assisted housing programs within the county. In total, there are 786 public housing units and 2,079 vouchers in use. Both White and Black/African American residents have a high demand for the identified program types. Less than 1% of public housing and vouchers are utilized by residents of another race. The majority of publicly assisted residents are "Not Hispanic".

Although the data show there continues to be significant competition for affordable housing in Lee County. Many families in need of housing assistance are elderly or disabled, or otherwise in need of housing accessibility features and security/utility deposit payment assistance. The LCHA and HACFM works to identify local landlords that supply accessible housing and make appropriate referrals. Additional resources for the public are available on the LCHA's and HACFM's website: <u>https://www.leecountyha.org/</u> and <u>https://www.hacfm.org/</u> respectively.

### NA-40 Homeless Needs Assessment - 91.205(c)

#### Introduction

Meeting homelessness challenges in Lee County is a collaborative effort comprising numerous individuals, agencies, stakeholders and organizations. Lee County is within the FL-603 Fort Myers, Cape Coral/Lee County Continuum of Care (CoC). The CoC is governed by a governing board made up of members of various community sectors that meet in conjunction with the Lee County Homeless Coalition. The CoC and subsequent sub-committees support the communities within Lee County. Most of the data utilized in this section of the Plan was gathered from the HUD Exchange, including the Point-in-Time (PIT) count.

HUD defines "homeless" as a person living in a place not meant for human habitation, in a safe haven, or in an emergency shelter. There are four federally defined categories under which individuals and families may qualify as homeless:

- 1. Literally homeless;
- 2. Imminent risk of homelessness;
- 3. Homeless under other Federal statues (e.g. unaccompanied youth or families with persistent housing instability); or
- 4. Fleeing/attempting to flee domestic violence.

In conjunction the CoC, several organizations serve the homeless population within Lee County. These include, but are not limited to, Lee County Homeless Coalition, Catholic Charities, St. Vincent de Paul CARES, Salvation Army, Operation PAR, Inc., Lee County Human and Veteran Services Department, Lee County Sheriff's Office, among others. It should be noted that any homeless census is an undercount because it is impossible to count locate every homeless person within geography as broad as Lee County.

#### **Homeless Needs Assessment**

Population	Estimate the # of p homelessness	Total	
	Sheltered	Unsheltered	
Persons in Households with			
Adult(s) and Child(ren)	105	74	179
Persons in Households with Only			
Children	13	0	13
Persons in Households with Only			
Adults	146	524	670
Chronically Homeless Individuals	19	177	196
Chronically Homeless Families	0	3	3
Veterans	24	43	67
Unaccompanied Child	13	0	13
Persons with HIV	5	6	11

Table 27 - Homeless Needs Assessment

Alternate Data Source Name:

2023 Homeless Point-in-Time Count

Data Source Comments:

HUD 2023 Continuum of Care Homeless Assistance Programs, Homeless Populations and Subpopulations (FL-603 Ft Myers, Cape Coral/Lee County CoC); Point-in Time Date: 1/25/2023

#### Indicate if the homeless population is: Has No Rural Homeless

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

#### **Chronically Homeless**

HUD defines a person as chronically homeless if they have been homeless for one year or longer, or have had four or more episodes of homelessness within the past three years and have a disabling condition. National studies have found that when all costs are factored in, chronically homeless persons account for approximately half of the total expenditures for homeless services. This percent of expenditure is based on a national average of just fewer than 22% of all homeless persons being considered as chronically homeless by the National Alliance to End Homelessness. In Lee County, the percentage of chronically homeless persons is slightly higher. Of the homeless persons counted during the 2023 PIT, 22.7% of those surveyed, or 196 individuals, met the HUD definition of chronically homeless.

#### Families

Persons in families comprised a large segment of the overall homeless population counted. Of the homeless counted, 179 persons were in families with children, comprising 50 adult/child households. There were 670 persons in households with only adults, and 13 persons in households with only children. In 2023, there was 7 chronically homeless persons in households with at least one adult and one child, 0 chronically persons in households with only children and 170 chronically homeless persons in households without children.

#### Veterans

There are an estimated 67 homeless veterans in Lee County, comprising 7.8% of the counted homeless population. In Lee County, 24 or (35.8%) of the total veteran homeless population of 67 is sheltered, while a majority of the veteran homeless population, 43 or 64.2%, is unsheltered.

#### **Unaccompanied Youth**

Unaccompanied youth accounted for approximately 3.6% or 31 of the 862 homeless persons that agreed to be surveyed. Approximately 41.9% of unaccompanied youth are children, while the majority of unaccompanied youth (58.1%) are young adults ages 18 to 24.

Race:	Sheltered:	Unsheltered (optional)
White	170	386
Black or African American	82	184
Asian	2	0
American Indian or Alaska		
Native	1	7
Pacific Islander	0	1
Ethnicity:	Sheltered:	Unsheltered (optional)
Hispanic	54	81
Not Hispanic	210	517

#### Nature and Extent of Homelessness: (Optional)

Table 28 – Nature and Extent of Homelessness

Alternate Data Source Name:

2023 Homeless Point-in-Time Count

Data Source Comments:

HUD 2023 Continuum of Care Homeless Assistance Programs, Homeless Populations and Subpopulations (FL-603 Ft Myers, Cape Coral/Lee County CoC); Point-in Time Date: 1/25/2023

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

The CoC keeps track of families with children and families of veterans in need if housing assistance. Persons in families comprised a large segment of the overall homeless population counted by the 2023 PIT. Of the homeless counted, 670 persons where in households without children, 179 persons where in households with at least one adult and one child and 13 persons were in households with only children.

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

The 2023 Point-in-Time Count indicated that 64.5% of persons who are homeless in Lee County are White. White persons represent 74.34% (2018-2022 American Community Survey: Table B02001) of the total Lee County population; therefore, White persons are underrepresented in the homeless population.

The second highest race within the homeless population was Black/African American with more than 30.85%. Black/African American persons represent 8.04% (2018-2022 American Community Survey: Table B02001) of the total Lee County population; therefore, Black/African American persons are overrepresented in the homeless population.

More than 15% of the persons counted identified as Hispanic or Latino. Hispanic or Latino persons represent 23.13% (2018-2022 American Community Survey: Table B03003) of the total Lee County population, therefore Hispanic or Latino persons are underrepresented in the homeless population.

#### Describe the Nature and Extent of Unsheltered and Sheltered Homelessness.

The total number of homeless persons counted in Lee County during the annual Point-in-Time Count was 862. Of the 862 homeless persons counted, 264 (30.63%) were sheltered and 598 (69.37%) were unsheltered. Of the sheltered, 264 (100%) were in emergency shelter rather than transitional housing. There were 177 unsheltered chronically homeless persons reported.

Based on this information, unsheltered persons comprise a significant percentage of the overall homeless population counted; indicating that there is a need for additional shelter and housing options. This includes additional shelter options separate from the traditional sheltering options like emergency shelters and transitional shelters. Such needs include permanent supportive housing or other programs specifically targeted to homeless subpopulations such as persons with mental illness/substance abuse challenges, veterans, and persons fleeing domestic violence or aging out of foster care.

There are more persons experiencing unsheltered homelessness due to availability of beds, particularly for households with single individuals. While the Point-in-Time data included with this Plan may provide a clear picture of sheltered homelessness, the nature and extent of unsheltered homelessness is more difficult to define. The best resource is data obtained from Lee County's Outreach workers. Outreach

staff at Lee Health, Lee County Human and Veteran Services, Community Assisted and Supported Living, and SalusCare engage persons experiencing unsheltered homelessness, and work to connect them to housing and supportive services. HMIS data from fiscal year 2023 indicates a total of 2,703 households comprised of 4,816 individuals entered into Lee County's Coordinated Entry (CE) system. Of these households, 740 (27%) were families with children, 1,072 (40%) were single male households, and 617 (23%) were single female households. However, 21% of households (587) and individuals (1,014) were either active in an emergency shelter at the time of entry into Coordinated Entry or were able to access shelter post-entry into Coordinated Entry.

#### Discussion

Generally, the needs of homeless persons include permanent supportive housing that combines case management with housing options, rapid re-housing, mental/behavioral health and substance abuse treatment services, and prevention activities including but not limited to access to employment opportunities, housing assistance/affordable housing, and social and health services geared toward specific subpopulations of homeless persons (e.g. chronically homeless, families with children, veterans, and unaccompanied youth). This is more evident given the outsized portion of the homeless population that is unsheltered in Lee County.

Based on the input received during the public meeting held in May 2024 and the public survey administered in May 2024, the priority needs of the homeless population in Lee County are homeless shelters (particularly for families with children, unaccompanied youth and women), mental health services, better resources for survivors of domestic violence and greater neighborhood outreach for homeless prevention.

#### **CDBG-DR Homelessness Funds and Programs**

The Community Development Block Grant Disaster Recovery (CDBG-DR) program provides communities impacted by disasters with resources to address a wide range of disaster-related needs. Those needs include preserving affordable housing opportunities, assisting in recovery for property owners, restoration of critical public facilities/infrastructure, mitigation through investment, continuation of public services and planning for future resiliency. Lee County completed a disaster impact and unmet needs assessment to identify the impacts, long-term needs, and priorities for more than \$1.1 billion of Community Development Block Grant-Disaster Recovery (CDBG-DR) funding allocated as a result of the 2022 Hurricane Ian event.

According to the 2023 Lee County CDBG-DR Action Plan, Amendment 4, the funding allocated for public services, \$15,000,000, will be available to fund the provision of services for persons who are low- and moderate- income, as well as those who are generally presumed to be principally LMI. This presumption covers abused children, battered spouses, elderly persons, adults meeting the Census Bureau definition of severely disabled persons^{*}, homeless persons, illiterate adults, persons living with AIDS, and migrant farm workers, in accordance with §570.208(a)(2)(i)(A).

Approximately one month after Hurricane Ian, Lee County's Homeless Continuum of Care relaunched the Coordinated Entry line, as a 24-hour, 7 day per week phone line that conducts assessments and makes referrals to shelter, housing, and services for persons experiencing homelessness. The County will ensure ongoing coordination with public service providers that work with vulnerable populations to ensure that any remaining or ongoing storm-related impact, including preventing households from becoming homeless, is brought to the County's attention for a coordinated approach. The County saw an increase in persons experiencing homelessness from 560 persons in 2022 to 857 persons in 2023. In coordination with the County's Human and Veterans Service Department, the Lee County Homeless Coalition estimates that about 857 individuals were homeless in January 2023 (both sheltered and unsheltered). Out of the 857 homeless, 197 were considered chronically homeless, with 109 under the age of 18, a drastic increase from the prior year. The Coalition attributes soaring rents and Hurricane Ian to this increase. Approximately 560 households, reporting as a family with children experiencing homelessness, have contacted Lee County's Coordinated Entry system. Of those, 152 or 27.1 percent cited Hurricane Ian as a reason for the current status of homelessness during their initial contact with Coordinated Entry.

CDBG-DR funding related to housing will also be used to assist in homelessness support, recovery and mitigation programs. Additionally, newly available ESG-RUSH will be used to provide rental assistance (Tenant-Based Rental Assistance/Rapid Rehousing) toward housing stabilization to address the increase in homelessness for reasons described above.

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

#### Introduction

Non-homeless special needs can include, but are not limited to, supportive services for persons who are elderly and persons with disabilities, substance abuse prevention and treatment, and mental health services. Non-homeless special needs are typically identified by school personnel, caseworkers, or agency staff in direct contact with persons or households that need services but not housing. Many of their needs are addressed through specific funding sources for those services, and many of those services are provided at agencies specializing in those services. Lee County and agencies in the community work together to meet these needs as appropriate and as funding is available.

#### Describe the characteristics of special needs populations in your community:

The special needs populations in Lee County who are not homeless may include those with vision impairment, hearing impairment, who are elderly, who have a developmental disability, or who have a physical disability. Many area agencies either provide services in home or are made accessible to the special needs populations.

According to the Census 2018-2022 American Community Survey, 13.8% of the total civilian noninstitutionalized Lee County population reported a range of disabilities. The elderly population has a significantly higher portion of physical disabilities than other age groups. Ther largest portion of persons with a disability of any age groups is the 75 years and over with 37.2% of the population experiencing some type of disability. This is followed by the 65 to 74 year old age group at 18.3%, rounding out the elderly population. The most common type of disability among persons 18 to 64 years and 65 years and over was ambulatory, referring to difficulty moving from place to place that makes it impossible or impractical to walk as a means of transportation.

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

Accessible housing units and transportation for persons with disabilities can be identified as needs for these populations. In Lee County, 19.2% of all persons who are over the age of 18 reported having an ambulatory disability. Accessible housing and transportation ensure that these persons are able to live independently. Additionally, 18.3% percent of the population aged 65 to 74 reported having a disability while 37.2% of the population over 75 reported having some type of disability. As confirmed during public participation and survey processes, there is a significant need for accessible housing and supportive services for elderly populations in Lee County. Affordable housing units are also needed for these populations. People with disabilities are in the midst of an increasingly acute affordable housing crisis. The National Low Income Housing Coalition's "Out of Reach 2022" reported that a person with a disability, whose sole source of income is Federal Social Security Income (SSI), can only afford a \$274 monthly rent payment.

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

The U.S. Center for Disease Control and Prevention (CDC) estimates that over one million adults and adolescents are living with HIV in the U.S., including those not yet diagnosed and those who have already progressed to AIDS.

In 2022, the Florida Department of Health reported there were 2,512 persons living with HIV in Lee County. Of those, 986 individuals were white, non-Hispanic, and 873 individuals were black, non-Hispanic. There were 622 Hispanic persons who were HIV positive. There were 5 individuals under the age of 12, 7 individuals between the ages of 13-19, 46 individuals between the ages of 20-24, 108 individuals between the ages of 25-29, 415 individuals between the ages of 30-39, 472 individuals between the age of 60. To assist those living with HIV/AIDs, Lee County Human and Veteran Services administers the local HOPWA program through Health Planning Council funding. The local HOPWA program provides client advocacy and access to housing services via intensive case management. Income and transitional housing are cited as the immediate needs. As explained above, social security income is far below what is necessary to cover housing costs and meet other needs, only covering \$274 of a monthly rent payment.

Agencies serving the population with HIV/AIDS and their families in Lee County include, but are not limited to AIDS Healthcare Foundation, CAN Community Health Cape Coral, Operation PAR and the Lee County Health Department, overseen by the Florida Department of Health.

# If the PJ will establish a preference for a HOME TBRA (Tenant-Based Rental Assistance) activity for persons with a specific category of disabilities (e.g., persons with HIV/AIDS or chronic mental illness), describe their unmet need for housing and services needed to narrow the gap in benefits and services received by such persons. (See 24 CFR 92.209(c)(2) (ii))

Although Lee County intends to fund TBRA activities during the 2024-2028 Consolidated Plan time period, the County does not intend to establish specific preference aside from the minimum requirements of TBRA eligibility.

#### Discussion

Non-Homeless Special Needs encompasses a diverse range of populations within the low to moderate income groups and in need of public services. This category includes the elderly, at-risk youth, individuals with physical or developmental disabilities, those with mental illnesses, victims of domestic violence, and other vulnerable populations. Non-profit agencies typically provide services to meet these needs, often working in collaboration with Lee County and its municipalities (such as Sanibel, Fort Myers Beach, Estero, Bonita Springs, etc.). However, many of these agencies are overwhelmed and consistently need funding support to continue delivering their services.

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

#### Describe the jurisdiction's need for Public Facilities:

Throughout the public participation and consultation process for the development of this plan, the need for Mental Health Facilities was identified as the most significant public facility need within the county. In a public survey conducted in May 2024, the most pressing issues identified in the county in relation of public facilities were Mental Health Facilities (62%), Childcare Centers (47%), Healthcare Facilities (46%), Facilities for Persons with Special Needs/Disabilities (41%) and Youth Centers/Senior Centers (41%). While neighborhoods will have differing needs and priorities, the Public Facility needs identified above apply to the county as a whole including incorporated cities and towns.

#### How were these needs determined?

Public facility needs were discussed during the public participation and consultation processes undertaken for the completion of this plan. Discussions from these meetings and analysis of the public survey revealed a need for additional public facilities and improvements across the county. The public survey was administered to any citizens regardless of area of residence. While specific needs in specific neighborhoods were not specifically requested, areas with the most responses included Unincorporated Lee County (38%), City of Fort Myers (24%), City of Cape Coral (23%), other City or Town (10%) and City of Bonita Springs (3%). It can be inferred that the public facility needs identified from citizens across the county are, in many ways, transitional across the county.

#### Describe the jurisdiction's need for Public Improvements:

Public improvement needs exist countywide. Like public facilities, some improvements will be accomplished using other funds, not included in this Consolidated Planning process. Those improvements, which are not included in this planning process and are located in low- and moderate-income areas, will be addressed as needed, and as funding allows. In a public survey conducted in May 2024, the most pressing issues identified in the county in relation of public improvements were Stormwater/Drainage Improvements (52%), Street Improvements (e.g., pavement, lighting, etc.) (48%), Potable/Drinking Water System Improvements (47%), Sanitary Sewer System Improvements (43%) and Accessibility Improvements for Persons with Disabilities (44%). While neighborhoods will have differing needs and priorities, the public improvement needs identified above apply to the county as a whole including incorporated cities and towns.

#### How were these needs determined?

Public improvement needs were discussed during the public participation and consultation processes undertaken for the completion of this plan. Discussions from these meetings and analysis of the public survey revealed a need for additional public facilities and improvements across the county. The public survey was administered to any citizens regardless of area of residence. While specific needs in specific neighborhoods were not specifically requested, areas with the most responses included Unincorporated Lee County (38%), City of Fort Myers (24%), City of Cape Coral (23%), other City or Town (10%) and City of Bonita Springs (3%). It can be inferred that the public improvement needs identified from citizens across the county are, in many ways, transitional across the county.

#### Describe the jurisdiction's need for Public Services:

There are a number of public service needs throughout the county. Public services have been provided in Lee County's target neighborhoods and to specific populations for a number of years. The need for these services is anticipated to continue throughout the duration of this Consolidated Plan. Such services include, but are not limited to, after school and summer youth programs, health and medical services, transportation, employment related programs, senior services, food pantries, and services for persons experiencing homelessness. In a public survey conducted in May 2024, the most pressing issues identified in the county in relation of public services were Mental Health Services (64%), Senior Services (49%), Healthcare Services (49%), Youth Services (48%) and Transportation Services (48%). While neighborhoods will have differing needs and priorities, the public improvement needs identified above apply to the county as a whole including incorporated cities and towns. The need for transportation services was also widely mentioned during the Focus Group consultation meeting on May 14, 2024.

#### How were these needs determined?

Public service needs were discussed during the public participation and consultation processes undertaken for the completion of this plan. Discussions from these meetings revealed a need for a variety of public services. Mental health and substance abuse programs are most needed throughout the county for all populations. Discussions from these meetings and analysis of the public survey revealed a need for additional public services across the county. The public survey was administered to any citizens regardless of area of residence. While specific needs in specific neighborhoods were not specifically requested, areas with the most responses included Unincorporated Lee County (38%), City of Fort Myers (24%), City of Cape Coral (23%), other City or Town (10%) and City of Bonita Springs (3%). It can be inferred that the public improvement needs identified from citizens across the county are, in many ways, transitional across the county.

#### CDBG-DR Infrastructure/Economic Development Needs and Programs:

The Community Development Block Grant Disaster Recovery (CDBG-DR) program provides communities impacted by disasters with resources to address a wide range of disaster-related needs. Those needs include preserving affordable housing opportunities, assisting in recovery for property owners, restoration of critical public facilities/infrastructure, mitigation through investment, continuation of public services and planning for future resiliency. Lee County completed a disaster impact and unmet needs assessment to identify the impacts, long-term needs, and priorities for more than \$1.1 billion of Community Development Block Grant-Disaster Recovery (CDBG-DR) funding allocated as a result of the 2022 Hurricane Ian event.

According to the 2023 Lee County CDBG-DR Action Plan, Amendment 4, the unmet needs analysis identified a total infrastructure unmet recovery need of \$3,040,625,610. The infrastructure systems affected by Hurricane Ian's widespread damage included damage to energy systems, roadways, bridges, traffic controls, water and wastewater treatment systems, septic systems, cell towers, and voice and data services. Transportation was hazardous as water and debris, including many boats, blocked roads; there were downed trees and power lines, and traffic lights were out. Both the Sanibel Causeway and the Matlacha Pass Bridge were severely damaged during the storm and those barrier island areas were inaccessible by car until repairs were made. The infrastructure programs together will receive \$370,934,020 of the allocated CDBG-DR funds from HUD, which represents approximately 33% of all funds allocated to Lee County. With that money the County will address and support the Hurricane Grant Program infrastructure match funding and support of critical infrastructure throughout Lee County.

Likewise, the unmet needs analysis identified a total economic unmet recovery need of \$440,320,907. Lee County has determined that the most impactful means by which to support overall economic recovery are included in housing and infrastructure programs. However, the County will continue to evaluate information related to the unmet needs of the business community and could decide to include an economic revitalization program into the CDBG-DR Action Plan through a future amendment.

### Housing Market Analysis

#### MA-05 Overview

#### Housing Market Analysis Overview:

The purpose of the Market Analysis is to evaluate the community context in which Lee County must administer its programs over the five-year period. Combined with the Needs Assessment, the Market Analysis provides the basis for the Strategic Plan and the projects and activities to be administered. Most of the data in this section is populated with default data from the Comprehensive Housing Affordability Strategy (CHAS) data developed by HUD, or from the most recently available American Community Survey (ACS), as well as locally available plans and reports. ACS data in this section reviews both Lee County as a whole (including Cape Coral and Fort Myers) and the Urban County grantee geography (excluding Cape Coral and Fort Myers). It important to note that HUD's Urban County grantee geography (i.e., less Cape Coral and Fort Myers) is used when consistent with how HUD's eCon Planning Suite populates CHAS-based tables in the NA and MA screens.

#### Housing Market Analysis Overview (Continued)

This section covers the following topics:

- <u>General Characteristics of the Housing Market</u>: The general characteristics of Lee County's housing market, including supply, demand, and condition/cost of housing, are described in the following sections: Number of Housing Units (MA-10); Cost of Housing (MA-15); and Condition of Housing (MA-20).
- <u>Lead-based Paint Hazards</u>: The Condition of Housing (MA-10) section provides an estimate of the number of housing units in Lee County that are occupied by low- or moderate-income families that may contain lead-based paint hazards.
- <u>Public and Assisted Housing</u>: A description of the public housing units in Lee County is provided in the Public and Assisted Housing (MA-25) section. This subsection details the physical condition of such units, the restoration and revitalization needs, Section 504 needs, and the public housing agency's strategy for improving the management and operation of public housing and the living conditions of low- and moderate-income families in public housing.
- <u>Assisted Housing</u>: The information collected in the Number of Housing Units (MA-10) section describes the number and targeting (income level and type of family served) of units currently assisted by local, state, or federally funded programs and an assessment of whether any units are expected to be lost from the assisted housing inventory for any reason, such as expiration of Section 8 contracts.
- <u>Facilities, Housing, and Services for Homeless Persons</u>: A brief inventory of facilities, housing, and services that meet the needs of homeless persons within Lee County is provided in the Homeless Facilities and Services (MA-30) section. Emphasis is given to chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied

youth. The inventory includes services directly targeted to homeless persons, as well as mainstream services, such as health, mental health, and employment services to the extent those services are used to complement services targeted to homeless persons.

- <u>Special Need Facilities and Services</u>: The Special Needs Facilities and Services (MA-35) section describes the housing stock available to persons with disabilities and other low-income persons with special needs, including persons with HIV/AIDS and their families. The section further describes the facilities and services that assist persons who are not homeless, but who require supportive housing and programs for ensuring that persons returning from mental and physical heath institutions receive appropriate supportive housing.
- <u>Barriers to Affordable Housing</u>: This section (MA-40) provides an assessment of the regulatory barriers to affordable housing that exist within Lee County. These regulatory barriers may include tax policies affecting land and other property, land use controls, zoning ordinances, building codes, fees and charges, growth limits, and policies that affect the return on residential investment.
- <u>Community Development</u>: These sections (MA-45 and MA-50) discuss non-housing community development assets and their relationship to low- and moderate-income neighborhoods and concentrations of racial and ethnic minorities. The purpose of these sections is to identify opportunities for housing investment and economic development.
- <u>Broadband Needs and Hazard Mitigation</u>: These sections (MA-60 and MA-65) describe the need for broadband access, as well as the natural hazard risks associated with climate change and vulnerability to these risks of housing occupied by low- and moderate-income households.

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

#### Introduction

The total number of housing units in Lee County increased 15.4% over the last decade, from an estimated 363,892 units in 2010 to 419,916 units in 2022. Of the 419,916 today, 228,142 (54.3 %) are owner-occupied and 83,206 (19.8%) are renter-occupied. In total, 311,348 units are occupied, and 108,568 units are vacant.

#### All residential properties by number of units

Property Type	Number	Percent
1-unit detached structure	230,084	54.8%
1-unit, attached structure	26,137	6.2%
2-4 units	30,770	7.3%
5-19 units	47,717	11.4%
20 or more units	44,268	10.5%
Mobile Home, boat, RV, van, etc.	40,940	9.7%
Total	419,916	100.0%

Table 29 – Residential Properties by Unit Number

Alternate Data Source Name: 2018-2022 ACS

#### Number of Units

As shown in **Table 29**, more than half (54.8%) of residential properties are single-family detached structures. Approximately 22% are multi-family structures with five or more units. Single-family detached and multi-family structures account for 76.7% of all housing units. Only 13.55% of units are "missing middle" type structures such as townhomes or duplex/triplex/quadplex. Mobile homes, boats, RVs, or vans account for 9.7% of housing units in Lee County.

#### **Unit Size by Tenure**

	Owners		Renters	
	Number	Percent	Number	Percent
No bedroom	739	0.3%	2,742	3.3%
1 bedroom	6,023	2.6%	12,699	15.3%
2 bedrooms	64,570	28.3%	35,186	42.3%
3 or more bedrooms	156,810	68.7%	32,579	39.2%
Total	228,142	100.0%	83,206	100.0%

Table 30 – Unit Size by Tenure

Alternate Data Source Name: 2018-2022 ACS

Data Source Comments: 2018-2022 ACS, Data Table: B25042

#### **Unit Size by Tenure**

As shown in **Table 30**, there are an estimated 311,348 total occupied housing units within Lee County. Of this total, 228,142 or 73% are owner-occupied and 83,206 or 27% are renter-occupied. Of all owner-occupied units, most contain 2 or more bedrooms (221,830 or 97%). Only a small number of owner-occupied units have 1 bedroom (6,023 or 2.6%) or no bedroom (739 or less than 1%). Of all renter-occupied units, most contain 1 or more bedrooms (80,464 or 97%). In comparison to owner-occupied units, more renter-occupied units have 1 bedroom (12,699 or 15.3%) or no bedroom (2,742 or 3.3%). Based on this data, smaller unit sizes are more available to renters, whereas larger units are more available to owners.

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

As noted in section NA-35 and MA-25, the Fort Myers Housing Authority (HACFM) and Lee County Housing Authority (LCHA) administer publicly assisted housing throughout Lee County. The operations of these housing authorities are funded through annual appropriations from the U.S. Department of Housing and Urban Development (HUD). According to the Office of Public and Indian Housing (PIH) Public Information Center (PIC), the following number and type of publicly assisted units are available:

- 980 public housing units (786 in use)
- 2,186 vouchers (2,079 in use)

This housing assistance is available to qualified very low-income families and very low-income elderly, disabled, handicapped and single persons.

Lee County also receives grants and entitlements from various funding sources, including Community Development Block Grant (CDBG), HOME Investment Partnerships Program (HOME), Emergency

Solutions Grant (ESG), State Housing Initiatives Partnership Program (SHIP), and others. Based on the 2023/2024 Annual Action Plan, Lee County plans to use CDBG and HOME funds to provide down payment assistance. They will also use CDBG funds to provide housing rehabilitation and reconstruction, public services, and infrastructure and public facilities improvements. They plan to use HOME funds to use on affordable housing developments and to use ESG funds to provide housing and services for persons who are homeless.

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

Data compiled by the Shimberg Center for Housing Studies at the University of Florida indicates that there are 13,486 assisted units in Lee County (Shimberg Center for Housing Studies). However, these units are funded by a variety of funding sources. Of these, 2,314 units are funded by HUD. Two developments, Jean Devereaux Apartments and Santa Barbara Village, subsidies will expire in May 2024. The expiration of these subsidies will result in the loss of 26 affordable housing units. The subsidy for an additional 205-assisted units is expected to expire between by the end of 2024 (HUD Multi-Family Assistance and Section 8 Documentation). Some private affordable housing units have also been lost due to the rise in economic and housing market conditions.

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

Lee County Housing stock in 2022 totaled 419,916 total units. Lee County's population in 2022 totaled 772,902 persons. The 2018-2022 American Community survey estimates an average household's size per unit as 2.44 persons. The total housing demand for the population is therefore 772,902/2.44, or about 316,763 housing units.

The existing housing stock of 419,916 exceeds the current demand of 316,763 needed units by 103,153 units. This figure does not take into account unit availability, or unit affordability, which are discussed below.

American Community Survey Data estimates that 25.9% of the existing housing stock is vacant, or 108,568 vacant units and 311,348 occupied units. Of the 108,568 vacant units, 81,397 are listed as being for seasonal, recreational, or occasional use.

The demand based on population and average household size (316,763) exceeds the number of occupied units (311,348) by approximately 5,415 units. In 2022, 12,822 vacant units were available for sale or rent, or a gross surplus of 7,407 available units.

#### Describe the need for specific types of housing:

Generally, there a lack of diversity of housing types in Lee County as a whole (including Cape Coral and Fort Myers). Most housing units (76.7%) are either single-family detached structures or multi-family structures (i.e., more than five units). Other housing types such as townhomes or duplex/triplex/quadplex comprise only 13.6% of the housing stock. Mobile homes, boats, RVs, vans, and other non-traditional units comprise 9.7% of housing options. This distribution does not provide a diverse selection of housing for low- and moderate-income persons who may not be able to afford a single-family home but may require multiple bedrooms not available in the typical apartment format.

By far, the most common housing unit size is two or 3 bedrooms regardless of tenure. More large units are occupied by owners than by renters, while more smaller units are occupied by renters. Smaller unit sizes (e.g., one bedroom or studio) are limited in supply, particularly for ownership.

Housing needs were discussed at length during the public meetings, Focus Group, Community Action Agency (CAA) public hearing, and the survey undertaken for the completion of this plan. Discussions from these meetings and the survey revealed the top five (5) housing needs:

- 1. affordable housing for rental,
- 2. affordable housing for ownership,
- 3. affordable rental housing for veterans,
- 4. affordable ownership housing for veterans, and
- 5. housing for seniors/elderly.

#### Discussion

A shortage of affordable housing may exist for extremely low, very low-, and low-income households served by Lee County. Most housing units are single-family detached structures or multi-family structure with five or more units. Other housing types, such as "missing middle" or non-traditional units are less represented. There is also a limited supply of smaller units, particularly for ownership. Two housing authorities administer publicly assisted housing in Lee County and monitor contract expirations and/or unit losses annually.

#### **CDBG-DR Number of Housing Units Unmet Needs**

The Community Development Block Grant Disaster Recovery (CDBG-DR) program provides communities impacted by disasters with resources to address a wide range of disaster-related needs. Those needs include preserving affordable housing opportunities, assisting in recovery for property owners, restoration of critical public facilities/infrastructure, mitigation through investment, continuation of public services and planning for future resiliency. Lee County completed a disaster impact and unmet needs assessment to identify the impacts, long-term needs, and priorities for more than \$1.1 billion of

Community Development Block Grant-Disaster Recovery (CDBG-DR) funding allocated as a result of the 2022 Hurricane Ian event.

According to the 2023 Lee County CDBG-DR Action Plan, Amendment 4, the unmet needs analysis states that in January 2022, a tornado ripped through the county destroying 74 homes, with an additional 61 sustaining major damage, and 58 sustaining minor damage. One hundred more homes were impacted but were in livable condition. Just as replacement trailers were being installed at the Tropicana Mobile Home Park, Hurricane Ian made landfall in the county and these replacement housing units were destroyed. These catastrophic damages compounded an already fragile housing market in the county.

According to the 2023 Lee County CDBG-DR Action Plan, Amendment 4, the unmet needs analysis states that Hurricane Ian destroyed over 9,900 homes in Lee County and at least 13,000 units suffered serious damage. This unprecedented level of damage rendered a significant number of the county's housing uninhabitable post-storm, with an additional 24,000 units having suffered lesser levels of damage. At the same time, Ian made approximately 40 percent of the county's hotel/motel rooms uninhabitable as well.

According to the 2023 Lee County CDBG-DR Action Plan, Amendment 4, Lee County, in an effort to address unmet housing needs, will implement the following projects:

- Single Family Housing Repair, Reconstruction, and Elevation
- Multi-Family and Rental Housing Repair, Rehabilitation, and Reconstruction
- New Construction of Affordable Housing Units
- Voluntary Residential Acquisition
- Home Purchase Assistance (i.e., downpayment, closing cost, and mortgage buydown assistance)

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

#### Introduction

HUD provides annual Fair Market Rent (FMR) and affordability of rental housing in counties and cities in the U.S. This section provides an overall picture of housing costs within Lee County as a whole (including Cape Coral and Fort Myers). The section describes housing cost trends, rent trends, fair market rents, and affordability.

#### **Cost of Housing**

	Base Year: 2010	Most Recent Year: 2022	Percent Change
Median Home Value	210,600	290,900	38.1%
Median Contract Rent	811	1,285	58.4%

Table 31 – Cost of Housing

Alternate Data Source Name: 2018-2022 ACS

Data Source Comments: 2006-2010 ACS and 2018-2022 ACS, Data Table: DP04 & B25058, Lee County as a whole (including Cape Coral and Fort Myers)

Rent Paid	Number	Percent
Less than \$500	2,427	3.0%
\$500-999	9,179	11.5%
\$1,000-1,499	30,574	38.3%
\$1,500-1,999	25,238	31.6%
\$2,000 or more	12,493	15.6%
Total	79,911	100.0%

Table 32 - Rent Paid

Alternate Data Source Name: 2018-2022 ACS

Data Source Comments: 2018-2022 ACS, Data Table: B25063, Lee County as a whole (including Cape Coral and Fort Myers)

#### **Cost of Housing**

The costs of housing trends in Lee County are displayed in **Table 31**. Median contract rent far outpaced median home value since 2010. According to the 2018-2022 ACS, the current median home value for Lee County is estimated to be \$290,900. This figure represents a 38.1% increase from the 2006-2010 ACS median home value of \$210,600. Between the 2006-2010 ACS and the 2018-2022 ACS, the median contract rent within the county increased by 58.4%, from \$811 to \$1,285. In contrast, median household income increased by 38.7% since 2010 (\$50,014 to \$69,368). Renters have felt a higher impact.

The distribution of estimated rents paid in Lee County is detailed in **Table 32**, according to 2018-2022 ACS data. Of all 79,911 rental units for which rent is paid, only 14.5% cost less than \$1,000. Approximately 70% of rental units cost between \$1,000 and \$1,999. Approximately 16% of rental units cost \$2,000 or more.

#### **Housing Affordability**

Number of Units affordable to Households earning	Renter	Owner
≤30% HAMFI	1,113	No Data
≤50% HAMFI but >30% HAMFI	5,381	10,464
≤80% HAMFI but >50% HAMFI	22,938	33,253
≤100% HAMFI but >80% HAMFI	No Data	50,087
Total	29,432	93,804

Data Source: 2016-2020 CHAS Table 33 – Housing Affordability

#### **Housing Affordability**

According to HUD, a unit is considered affordable if housing costs do not exceed 30% of household income. **Table 33**, based on 2016-2020 CHAS data, first divides households into four income ranges: less than or equal to 30% HUD Adjusted Median Family Income (HAMFI), less than or equal to 50% HAMFI, less than or equal to 80% HAMFI, and less than or equal to 100% HAMFI. The table also separates housing units into either rental units or owner units.

For households with incomes less than or equal to 30% HAMFI, a total of 1,113 available rental units are considered affordable, while no data is available for owner units. For households with incomes less than or equal to 50% HAMFI, a total of 6,494 affordable rental units are available, while 10,464 affordable owner units are available. For households with incomes less than or equal to 80% HAMFI, a total of 29,432 affordable rental units are available, while 43,717 affordable owner units are available. Finally, for households with incomes less than or equal to 100% HAMFI, a total of 93,804 affordable owner units are available, while 29,432 are provided for affordable rental units. When renter and owner units are compared, the availability of affordable owner units exceeds that of renter units.

As noted previously, an estimated 83,206 renter-occupied units are located within Lee County (2018-2022 ACS). Of this total, only 1% of renter-occupied units are affordable to the lowest income households (less or equal to 30% HAMFI) and 8% are affordable to households earning less than or equal to 50% HAMFI. A much larger percentage (35%) of renter-occupied housing units are affordable to households earning less than or equal to 80% HAMFI. In general, these 29,432 renter-occupied units are affordable.

An estimated 228,142 owner-occupied housing units are located within Lee County. Of this total, 3% are affordable to households earning less than or equal to 50% HAMFI, 19% are affordable to households earning less than or equal to 80% HAMFI, and 41% are affordable to households earning less than or equal to 100% HAMFI. In general, these 93,804 owner-occupied housing units are affordable.

#### **Monthly Rent**

Monthly Rent (\$)	Efficiency (no bedroom)	1 Bedroom	2 Bedroom	3 Bedroom	4 Bedroom
Fair Market Rent	1,134	1,141	1,451	1,896	2,157
High HOME Rent	949	1,018	1,223	1,401	1,546
Low HOME Rent	745	798	957	1,106	1,235

Table 34 – Monthly Rent

Alternate Data Source Name: FY 2023 HUD FMR and HOME Rents

#### **Monthly Rent**

**Table 34** shows HUD Fair Market Rents and HUD HOME Rents within the Cape Coral - Fort Myers, FL MSA. Fair Market Rents (FMRs) are gross rent estimates that include rent plus the cost of all tenant-paid utilities. FMRs are set to the dollar amount at which 40% of the standard-quality rental housing units are rented, excluding nonmarket rental housing (e.g., public housing). High HOME Rents are equal to the FMR or 30% of the adjusted income of a family whose income equals 65% AMI, whichever is lower. Low HOME Rents are equal to 30% of the adjusted income of a family whose income equals 50% AMI.

The Fair Market Rent in the MSA ranges from \$1,134 for an efficiency unit (no bedroom) to \$2,157 for a 4-bedroom unit. In contrast, the High HOME Rent ranges from \$949 for an efficiency unit to \$1,546 for a 4-bedroom unit. The Low HOME Rent ranges from \$745 for an efficiency unit to \$1,235 for a 4-bedroom unit. For smaller units, the average difference between the HUD HOME Rents and Fair Market Rent for smaller units is approximately \$300; however, the average difference between these rents for larger units is as much as \$700. This may point to affordability concerns for families needing larger unit sizes.

#### Is there sufficient housing for households at all income levels?

A comparison of the total number of households at the various income levels (see Table 7) and the total number of affordable housing units available for the various income levels (see Table 33) can reveal surpluses or shortages of affordable housing.

There are 20,665 very low-income households earning 0-30% HAMFI in Lee County. Because only 1,113 affordable rental units are identified in the CHAS database, and an undetermined number of owner units are available, a significant shortage of affordable units likely exists within the county for low-income households. Similarly, there appears to be a shortage of affordable housing for low-income households. A total of 20,830 households in the county earn 30-50% HAMFI. According to the CHAS database, 5,381 rental-units and 10,464 owner-units (a total of 15,845 units) are available and affordable to low-income households. In contrast, there does not appear to be a shortage of affordable housing for moderate-income households. A total of 34,588 households in the county earn 50-80% HAMFI. There are approximately 22,938 affordable rental units and 33,253 affordable owner-occupied units (a total of 56,191 units) available and affordable to moderate-income households. A total of 20,830 households in the county the county earn 50-80% HAMFI. There are approximately 22,938 affordable rental units and 33,253 affordable owner-occupied units (a total of 56,191 units) available and affordable to moderate-income households, according to the CHAS database.

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

Data and analysis in this section is reviewing Lee County as a whole (including Cape Coral and Fort Myers). The estimated median home value within Lee County increased from \$210,600 to \$290,900 according to the 2006-2010 and 2018-2022 ACS, a 38.1% positive change. Over this same period, Lee County's contract rent increased by 58.4% from \$811 to \$1,285.

Lee County's median household income increased by 38.7% between the 2006-2010 ACS and the 2018-2022 ACS, from \$50,014 to \$69,368; however, median contract rent outpaced that increase. When housing costs outpace median household income, housing becomes more unaffordable. This, combined with the county's lack of smaller (i.e., less than two-bedroom) units or diverse housing types, could undermine affordability.

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

Data and analysis in this section is reviewing Lee County as a whole (including Cape Coral and Fort Myers). American Community Survey data provides the median gross rent by bedrooms in Lee County in 2022 (Table B25031). The following is a comparison of the median gross rents (MGR) and Lee County's 2022 Fair Market Rent (FMR):

- No Bedroom \$1,333 (MGR), \$976 (FMR)
- 1 Bedroom \$1,202 (MGR), \$979 (FMR)

- 2 Bedroom \$1,382 (MGR), \$1,231 (FMR)
- 3 Bedroom \$1,658 (MGR), \$1,603 (FMR)
- 4 Bedroom \$1,829 (MGR), \$1,820 (FMR)
- 5 or more bedrooms \$2,558 (MGR), Not Reported

For all bedroom units FMR was lower than MGR. For units with 3 or 4 bedrooms the MGR was just slightly higher (\$55 higher for 3 bedrooms and \$9 higher for 4 bedrooms) than FMR, indicating that larger units are closer to being more affordable in Lee County than smaller units.

#### Discussion

Within Lee County as a whole (including Cape Coral and Fort Myers), there is a potential shortage of units affordable to extremely low, very low, and low-income households. Housing costs for renter-occupied units have significantly outpaced household income, increasing 58.4% since 2010. Rent paid exceed \$1,000 per month for most rental units. Deficits in affordable rental units exist for all income groups below 80% AMI. There is also a lack of housing type diversity that further limits affordability. Most housing units are either single-family detached homes or multi-family apartment complexes, with few alternative housing types. As housing costs outpace household income, and the housing stock is limited, households earning less than 80% AMI may face significant barriers to affordable housing.

#### **CDBG-DR Cost of Housing Unmet Needs**

The Community Development Block Grant Disaster Recovery (CDBG-DR) program provides communities impacted by disasters with resources to address a wide range of disaster-related needs. Those needs include preserving affordable housing opportunities, assisting in recovery for property owners, restoration of critical public facilities/infrastructure, mitigation through investment, continuation of public services and planning for future resiliency. Lee County completed a disaster impact and unmet needs assessment to identify the impacts, long-term needs, and priorities for more than \$1.1 billion of Community Development Block Grant-Disaster Recovery (CDBG-DR) funding allocated as a result of the 2022 Hurricane Ian event.

According to the 2023 Lee County CDBG-DR Action Plan, Amendment 4, the unmet needs analysis stated that COVID-19 already had the county's housing market in a strained state with significant income losses, inflation, and an in-migration population boom to the county. The housing market, unable to keep up with the demand, was characterized by a decrease in housing availability and an increase in housing costs, leaving individuals struggling to find housing. The impacts of the COVID-19 pandemic, the January 2022 tornado, and Hurricane Ian all compounded an already fragile housing market in the county.

The 2023 Lee County CDBG-DR Action Plan, Amendment 4, estimates that there was a total housing loss of \$5.5 billion and an estimate of housing loss to rebuild at \$7.2 billion. The unmet needs analysis calculated the total housing unmet need by taking the estimated housing loss (\$7,237,551,880) and

subtracting the total estimated housing assistance (\$2,639,199,435) to get an estimated \$4,598,352,445 of unmet cost for housing needs.

According to the 2023 Lee County CDBG-DR Action Plan, Amendment 4, Lee County, in an effort to address unmet housing needs, will implement the following projects:

- Single Family Housing Repair, Reconstruction, and Elevation
- Multi-Family and Rental Housing Repair, Rehabilitation, and Reconstruction
- New Construction of Affordable Housing Units
- Voluntary Residential Acquisition
- Home Purchase Assistance (i.e., downpayment, closing cost, and mortgage buydown assistance)

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

The data within this MA-20 section is for the Urban County grantee geography (i.e., Lee County excluding Cape Coral and Fort Myers, which are separate entitlement communities). This section describes the significant characteristics of the housing stock in terms of age, condition, and vacancy of units. Housing stock age is frequently used as an indicator of housing condition. Most residential structures over 30 years of age will require minor repairs and modernization improvements, while units over 50 years in age are more likely to require major rehabilitation. According to the U. S. Census Bureau's 2018-2022 American Community Survey, 23.3 % of Lee County's housing stock is over 30 years old. The high percentages of pre-1980 housing units are located in the older neighborhoods of the Town of Fort Myers Beach, City of Sanibel, and the City of Fort Myers. Cities of Bonita Springs and Cape Coral have relative newer housing stocks. The impacts of Hurricane Ian have significantly affected the housing stock in these communities; therefore, currently published ACS estimates may not be reflective of actual conditions post-hurricane.

# Describe the jurisdiction's definition of "standard condition" and "substandard condition but suitable for rehabilitation":

The following definitions pertain to this section:

- "Standard condition" A housing unit that meets HUD Housing Quality Standards (HQS) and all applicable state and local codes.
- "Substandard condition but suitable for rehabilitation" A housing unit that contains one or more housing condition (defined below), contains a lead-based paint hazard, and/or is condemned as unfit for human habitation but is both structurally and financially feasible to rehabilitate.
- "Substandard condition not suitable for rehabilitation" A housing unit that contains one or more housing condition (defined below), contains a lead-based paint hazard, and/or is condemned as unfit for human habitation and is not structurally or financially feasible to rehabilitate.

Additionally, the term "abandoned vacant unit" is defined by HUD as:

- A housing unit that has been foreclosed upon and vacant for at least 90 days.
- A housing unit where no mortgage or tax payments have been made by the property owner for at least 90 days.
- A housing unit where a code enforcement inspection has determined that the property is not habitable, and the owner has taken no corrective actions within 90 days of the notification of the deficiencies.

#### **Condition of Units**

Condition of Units	Owner-Occupied		Renter	-Occupied
	Number	Percent	Number	Percent
With one selected Condition	35,989	23.8%	23,538	49.4%
With two selected Conditions	894	0.6%	1,674	3.5%
With three selected Conditions	115	0.1%	120	0.3%
With four selected Conditions	0	0.0%	0	0.0%
No selected Conditions	114,376	75.6%	22,334	46.9%
Total	151,374	100.0%	47,666	100.0%

Table 35 - Condition of Units

#### Alternate Data Source Name:

2018-2022 ACS

Data Source Comments:

2018-2022 ACS, Data Table: B25123. The data herein corresponds to the Urban County (Lee County grantee geography) and excludes data for the cities of Cape Coral and Fort Myers, which are separate entitlement communities.

#### **Condition of Units**

**Table 35** shows the condition of occupied housing units in Lee County, with a breakdown of owneroccupied units and renter-occupied units. As defined by HUD, a housing "condition" includes the following:

- A housing unit that lacks complete plumbing facilities
- A housing unit that lacks complete kitchen facilities
- A housing unit with more than one person per room
- A housing unit with a cost burden greater than 30% of the occupant's household income

According to 2018-2022 ACS data, the majority (114,376 or 75.6%) of Lee County's 151,374 owneroccupied housing units have no housing conditions. Of the remaining owner-occupied housing units, a quarter have one housing condition (35,989 or 23.8%). Very few owner-occupied units (less than 1%) have more than one housing condition.

Of the estimated 47,666 renter-occupied housing units in Lee County, less than half (22,334 or 46.9%) have no housing conditions. Half (23,538 or 49.4 %) of renter-occupied units have one housing condition. Approximately 4% have more than one housing condition.

#### Year Unit Built

Year Unit Built	Owner-O	Owner-Occupied		ccupied
	Number	Percent	Number	Percent
2000 or later	61,386	40.6%	18,327	38.4%
1980-1999	56,781	37.5%	16,136	33.9%
1950-1979	32,082	21.2%	12,737	26.7%
Before 1950	1,125	0.7%	466	1.0%
Total	151,374	100.0%	47,666	100.0%

Table 36 – Year Unit Built

#### Alternate Data Source Name:

2018-2022 ACS

Data Source Comments:

2018-2022 ACS, Data Table: B25036. The data herein corresponds to the Urban County (Lee County grantee geography) and excludes data for the cities of Cape Coral and Fort Myers, which are separate entitlement communities.

#### Year Unit Built

The age of housing units in Lee County (Urban County grantee geography) is detailed in **Table 36**, as supplied by the 2018-2022 ACS. Of the 151,374 owner-occupied housing units, the majority (78.1%) were built after 1980, with 56,781 (37.5%) built between 1980 and 1999; and 61,386 (40.6%) built after 2000. The remaining 33,207 (21.9%) of owner-occupied units were built before 1980.

Of the 47,666 renter-occupied housing units, the majority (72.3%) were built after 1980, with 16,136 (33.9%) built between 1980 and 1999; and 18,327 (38.4%) built after 2000. The remaining 13,203 (27.7%) of renter-occupied units were built before 1980.

#### Risk of Lead-Based Paint Hazard

Risk of Lead-Based Paint Hazard	Owner-Occupied		Renter-Occupied	
	Number	Percent	Number	Percent
Total Number of Units Built Before 1980	33,207	21.9%	13,203	27.7%
Housing Units build before 1980 with children present	13,287	9%	7,802	17%

Table 37 – Risk of Lead-Based Paint

Alternate Data Source Name: 2018-2022 ACS

 Data Source Comments:
 2018-2022 ACS, Data Table: B25036; 2016-2020 CHAS, Data Table: 13. The ACS data herein corresponds to the Urban County (Lee County grantee geography) and excludes data for the cities of Cape Coral and Fort Myers, which are separate entitlement communities.

#### **Risk of Lead-Based Paint Hazard**

The risk of lead-based paint hazards in Lee County is estimated in **Table 37**. Because the actual number of housing units with lead-based paint is not available, these numbers are estimates.

For the purposes of this plan, a housing unit built before 1980 is presumed to have a higher risk of leadbased paint. Therefore, the table shows the total number of owner-occupied and renter-occupied units that were built before 1980, as well as those built before 1980 with children present. The data for this table is from the 2018-2022 ACS and 2016-2020 CHAS.

As shown in **Table 37**, 33,207 (21.9%) of owner-occupied housing units in Lee County were built prior to 1980, while 13,287 (9%) were built before 1980 and have children present. For renter-occupied housing units, 13,203 (27.7%) were built prior to 1980, while 7,802 (17%) were built prior to 1980 and have children present. Although there is a high percentage of housing units built before 1980, signifying a higher risk of lead-based paint, there is a low percentage of older housing units with children present. A slightly higher percentage of older housing units with children present are renter-occupied.

#### Vacant Units

	Suitable for Rehabilitation	Not Suitable for Rehabilitation	Total
Vacant Units	19,108	62,843	81,951
Abandoned Vacant Units	N/A	N/A	N/A
REO Properties	7	20	27
Abandoned REO Properties	0	0	0

Table 38 - Vacant Units

Alternate Data Source Name:

2018-2022 ACS

Data Source Comments:

Vacant units reported in 2018-2022 ACS, Data Table: B25004. The ACS data herein corresponds to the Urban County (Lee County grantee geography) and excludes data for the cities of Cape Coral and Fort Myers, which are separate entitlement communities. REO properties sourced from RealityTrac.com, accessed June 6, 2024.
 *Abandoned Vacant Units = N/A (Not available)

#### Vacant Units

According to 2018-2022 ACS data, there are a total of 280,991 housing units within Lee County (excluding the cities of Cape Coral and Fort Myers, which are separate entitlement communities). As shown in **Table 38**, 81,951 (29.2%) of these are vacant. As defined in the American Community Survey, a housing unit is vacant if no one is living in it at the time of interview. Units occupied at the time of interview entirely by persons who are staying two months or less and who have a more permanent residence elsewhere are considered temporarily occupied and are also classified as "vacant." Since approximately 23% of Lee County's housing units were built before 1980; an estimated 19,108 vacant housing units may be suitable for rehabilitation. There is no data available for abandoned units.

According to the foreclosure database maintained by RealtyTrac.com as accessed in June 2024, Lee County has 1,567 foreclosures, 27 bank owned properties, 101 headed for auction, and 5,881 properties for sale. Assuming approximately 23% percent of the county's housing units were built before 1980; an estimated 7 REO properties may be suitable for rehabilitation.

#### Need for Owner and Rental Rehabilitation

In terms of housing quality, 23.8% of owner-occupied housing units in Lee County (excluding data for the cities of Cape Coral and Fort Myers, which are separate entitlement communities) have at least one housing condition, while 49.4% of renter-occupied housing units have at least one housing condition (see Table 37). Relative to the age of housing, 21.9% of the county's owner-occupied units were built prior to 1980, while 27.7% of renter-occupied units were built prior to 1980 (see Table 38). Although the exact number of homes with lead-based paint is not known, it is assumed that housing units built prior to 1980 have a higher risk of lead-based paint hazards. Generally, these statistics point toward the need for Lee County to facilitate both owner and rental housing rehabilitation.

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

**Table 38** notes that, in Lee County, 32,674 owner-occupied housing units were built prior to 1980 and 13,102 renter-occupied housing units were built prior to 1980. These units are assumed to have a higher risk of lead-based paint hazards.

As of the 2018-2022 ACS, there are an estimated 199,040 occupied housing units within Lee County (excluding data for the cities of Cape Coral and Fort Myers, which are separate entitlement communities). Approximately 46,410 or 23.3% of these housing units are assumed to have a higher risk of lead-based paint hazards. According to HUD 2016-2022 CHAS data, approximately 76,083 low- or moderate-income households (earning less than or equal to 80% HAMFI) reside in Lee County. Therefore, approximately 17,727 housing units occupied by low- and moderate-income families may have a higher risk of lead-based paint hazards.

#### Discussion

In terms of housing conditions, a higher percentage of renter-occupied units have housing conditions when compared to owner occupied units. Most of Lee County's housing units were built after 1980; however, a significant percentage (21.9% of owner-occupied units and 27.7% of renter-occupied units) were built before 1980 and may have housing problems or risk of lead-based paint. Due to the combination of housing conditions and unit age, there is a need for Lee County to facilitate housing rehabilitation, particularly for renter-occupied housing units.

#### **CDBG-DR Condition of Housing Unmet Needs**

The Community Development Block Grant Disaster Recovery (CDBG-DR) program provides communities impacted by disasters with resources to address a wide range of disaster-related needs. Those needs include preserving affordable housing opportunities, assisting in recovery for property owners, restoration of critical public facilities/infrastructure, mitigation through investment, continuation of public services and planning for future resiliency. Lee County completed a disaster impact and unmet needs assessment to identify the impacts, long-term needs, and priorities for more than \$1.1 billion of Community Development Block Grant-Disaster Recovery (CDBG-DR) funding allocated as a result of the 2022 Hurricane Ian event.

According to the 2023 Lee County CDBG-DR Action Plan, Amendment 4, the unmet needs analysis Hurricane Ian destroyed over 9,900 homes in Lee County and at least 13,000 units suffered serious damage. This unprecedented level of damage rendered a significant number of the county's housing uninhabitable post-storm, with an additional 24,000 units having suffered lesser levels of damage. At the same time, Ian made approximately 40 percent of the county's hotel/motel rooms uninhabitable as well. Addressing this extensive loss of housing units and options will be a focus for the county in its use of CDBG-DR funding.

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

#### Introduction

As was noted earlier in Section NA-35, the HACFM and LCHA administer programs that deliver housing assistance to low- and very low-income persons in Lee County. Both public housing units and vouchers are in use in Lee County. Lee County currently has funding available for 2,186 vouchers. There are currently 2,398 households on the waiting list for Housing Choice Vouchers and 2,768 applicants on the waiting list for public housing. The need for public housing assistance far outweighs the supply, as demonstrated by the length of the waiting list.

#### **Totals Number of Units**

Program Type											
	Certificate	Mod- Rehab	Public Housing	Vouchers							
				Total	Project -based	Tenant - based	Special Purpose Voucher				
							Veterans Affairs Supportive Housing	Family Unification Program	Disabled *		
# of units vouchers available	0	0	980	2,186	1	1,914	814	0	C		
# of accessible units											

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

Table 39 – Total Number of Units by Program Type

Data Source: PIC (PIH Information Center)

#### Describe the supply of public housing developments:

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

**Table 39** shows the total number of units assisted by local, state or federally funded programs based on default data sourced from the Public and Indian Housing (PIH) Information Center (PIC). The HUD IDIS default data set shows a total countywide supply of 3,166 publicly assisted housing units in Lee County, comprised of 980 public housing units, 1 project-based voucher, 1,914 tenant-based vouchers (Housing Choice Vouchers or HCVs), and 814 special purpose vouchers (Veterans Affairs Supportive Housing (VASH)).

There are 980 public housing units. The HACFM and the CoC administers programs that deliver housing assistance to low- and very low-income persons in Lee County. These include public housing, project-based vouchers, tenant-based vouchers (Housing Choice Vouchers or HCVs), and special purpose voucher activities. Combined, these activities supply approximately 2,186 publicly assisted housing units in the Lee County area.

The following provides an inventory of publicly assisted housing (not limited to public housing):

- Community-Based Housing: Southward Village (2990 Edison Avenue Fort Myers, FL), 200 Units; Horizons Apartments (5360 Summerlin Rd., Fort Myers, FL) 170 units; Bonair Tower (1915 Halgrim Avenue, Fort Myers, FL) 101 Senior Units; Royal Palm Towers (2424 Edwards Dr. Fort Myers, FL) 101 Senior Units.
- Affordable Housing: Broadway Apartments (909 & 2929 Broadway Avenue, Fort Myers, FL) 40 Units; Covington Meadow (1400 Parkwood Palm Blvd., Lehigh Acres, FL) 16 Units; Stella Apartments (2720 Royal Palm Avenue, Fort Myers, FL) 12 Units; Coconut Cove I (1221 SE 8th Terrace, Cape Coral, FL) 8 Senior Units; Coconut Cove II (515 Van Loon Terrace, Cape Coral, FL) 3 Senior Units; Swanson Loop (4701 Swanson Loop, North Fort Myers, FL) 60 Senior Units; East Point Place (4211Romeo Ln, Fort Myers, FL); Renaissance Preserve (4221 Othello Ln., Fort Myers, FL), Pine Echo and Barrett Park.

#### **Public Housing Condition**

Public Housing Development	Average Inspection Score				
Southward Village (HACFM)	80				
Bonair Tower (HACFM)	87				
Royal Palm (HACFM)	86				
Horizons (HACFM)	73				
East Point Place (HACFM)	88				
Renaissance Preserve - Senior (HACFM)	68				
Renaissance Preserve Family - Phase II (HACFM)	39				
Renaissance Preserve Family - Phase III (HACFM)	37				
Pine Echo (LCHA)	93				
Barrett Park (LCHA)	97				
Phase IV - A (HACFM)	60				
Phase IV - B (HACFM)	31				

#### **Table 40 - Public Housing Condition**

#### Data Source:

HUD Real Estate Assessment Center (REAC) Public Housing Physical Inspections Scores (Florida), accessed May 2024 (2020-2022)

#### **Public Housing Condition**

**Table 40** shows the condition of public housing based on average inspection score for the most recent inspection year.

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

HACFM is currently undertaking the "Greater Dunbar Initiative", a massive redevelopment of the Southward Village complex. The Greater Dunbar Initiative will address the needs of residents in the 199unit Southward Village public housing community with improved opportunities. Specifically, the transformed Southward Village site will include 375 new mixed-income apartments, of which 159 will be reserved for Southward Village residents. An additional 40 homes will be available at a 90-unit development on Cleveland Avenue. All housing will be supported with new infrastructure and complemented with amenities including a clubhouse, fitness center, business center, parks and playgrounds throughout the revitalized village. Construction (Demolition) has started as of May 2024.

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

HACFM has a homeownership program within the HCV program where the voucher can be used towards a mortgage. The FSS program in both its Public Housing and Housing Choice Voucher programs, is used to encourage homeownership. HACFM has an elderly service coordinator who plans regular activities for senior residents. Additionally, the PHA's program encourages residents to participate in HUDs Earned Income Disallowance program, which allows the resident to have their earned income not counted towards rent to encourage homeownership. Residents are always encouraged to attend monthly resident meetings, which are held at all developments to provide input regarding improving living environments. Resident meetings are also held when new developments are being considered to gather input regarding amenities, such as outdoor activities for children, colors, floors etc.

#### Discussion

The HACFM works cooperatively with Lee County and the CoC and private entities in the provision of public and subsidized housing within Lee County. The HACFM administers public housing for seniors and families in addition to the Housing Choice Voucher (HCV) program that provides financial rental assistance to eligible individuals and families based upon income. As discussed, the public housing authorities currently administer 2,186 publicly assisted housing vouchers available, of which 980 are for public housing, 814 for veterans, 1,914 are tenant-based vouchers, and one project-based voucher. The HACFM is also currently undertaking the redevelopment of the Southward Village affordable housing complex to reinvigorate the site and provide more affordable housing options for residents with modern amenities.

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

#### Introduction

Critical to the success of homeless services is the capacity to coordinate systems of care beyond sheltering, healthcare, mental health counseling, employment, etc. and the ability to follow a case through a myriad of providers to ensure that an individual or family is transitioned out of homelessness.

Lee County's 2019-2028 Continuum of Care Strategic Plan outlines the goals and objectives the CoC plans to carry out to ensure that homelessness in Lee County is a rare, brief, and one-time experience. The plan is based on the framework of the USICH Strategic Plan, *Home, Together,* and focuses largely on the provision of permanent housing and services necessary to maintain that housing.

#### **Facilities and Housing Targeted to Homeless Households**

	Emergency S	helter Beds	Transitional Housing Beds	Permanent Supportive Housing Beds		
	Year-Round Beds (Current & New)	Voucher / Seasonal / Overflow Beds	Current & New	Current & New	Under Development	
Households with Adult(s)						
and Child(ren)	147	25	0	242	0	
Households with Only						
Adults	197	0	0	68	0	
Chronically Homeless						
Households	0	0	0	18	72	
Veterans	0	0	0	242	0	
Unaccompanied Youth	22	0	0	0	0	

Table 41 - Facilities and Housing Targeted to Homeless Households

Alternate Data Source Name: 2023 Housing Inventory Chart

Data Source Comments:

HUD 2023 Continuum of Care Homeless Assistance Programs, Housing Inventory Count Report (FL-603: Ft Myers, Cape Coral/Lee County CoC); "Under Development" data sourced from Public Housing Authority as of May 2022.

#### **Facilities and Housing Targeted to Homeless Households**

**Table 41** shows the number of facilities targeted to homeless persons in Lee County. In Lee County, there are a total of 391 Emergency Shelter Beds. Of which, 172 are for households with adults and children, 197 are for households with only adults, and 22 are for unaccompanied youth. There are a total of 570 Permanent Supportive Housing Beds in Lee County. Of which 242 are for households with

adults and children, 68 are for households with only adults, 18 are for chronically homeless households, and 242 are for veterans. Permanent Supportive Housing is provided by Community Assisted and Supportive Living (CASL), Housing Authority City of Fort Myers (HACFM), and Lee County Housing Authority (LCHA). According to CASL, their current inventory is 126 PHA beds with 72 under development.

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

The CoC has multiple partnerships throughout the county that provide healthcare services and mental healthcare services to those experiencing homelessness.

#### Medical/Healthcare Resources

The healthcare services are provided by the following agencies:

- 1. Premier Mobile; provides mobile healthcare
- 2. SWFL Family Health Centers
- 3. Lee Health
- 4. Molina Healthcare
- 5. Atena Healthcare
- 6. Dedicated Senior Medical Healthcare
- 7. Informed Choice Healthcare
- 8. Freedom Health
- 9. Veterans Administration Cape Coral

#### **Mental Health Resources**

The mental healthcare services are provided by the following agencies:

- 1. Centerstone
- 2. Center for Progress in Excellence
- 3. Abuse Counseling and Treatment Center
- 4. Kimmie's Recovery Zone
- 5. Salus Care
- 6. Park Royal Hospital
- 7. Veterans Administration Cape Coral

#### **Employment Resources**

Through CareerSource Southwest Florida, the following services are available to individuals:

- 1. Career counseling: Providing one-on-one career counseling to students can help them explore their interests, strengths, and goals, and develop a plan for achieving them.
- 2. Skills training: Offering workforce training programs that provide students with hands-on experience and job-specific skills can help prepare them for success in their chosen fields.
- 3. Job search assistance: Providing job search assistance to students can help them navigate the job market and find opportunities that match their skills and interests.
- 4. Industry partnerships: Partnering with local businesses and industry organizations can help provide students with access to real-world work experiences, networking opportunities, and connections to potential employers.
- 5. Mentoring programs: Offering mentoring programs that pair students with experienced professionals in their chosen fields can help provide guidance, support, and valuable insights into the industry.

Through CareerSource Southwest Florida, the following services are available to businesses at no cost:

- Recruitment
- Job matching
- Applicant pre-screening
- Referrals to positions
- Job fairs Hiring events
- Private interviewing facilities
- Employee training facilities

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

Lee County Human and Veteran Services is the lead agency for the CoC and is critical to Lee County's Institutional Delivery Structure through its coordination of facilities for the homeless and providing services across its membership. There are over 75 members of the CoC including non-profit members, major corporate members, business members, government agency members, and faith-based members that provide facilities and services for homeless individuals and families.

Facilities and services previously described, are available for persons experiencing homelessness and include those who are chronically homeless. In addition to these, the CoC has designed a homelessness response system, which aims to include all of the core components of a CoC. Locally these components

include prevention, shelter, rapid re-housing, and permanent supportive housing. Prevention is provided through Lee County Human and Veteran Services and local non-profit organizations and is focused to ensure persons at risk of homelessness remain stably housed. Shelter is provided through various nonprofits, including the Salvation Army family shelter. Rapid Re-Housing (RRH) is provided for families with children through the Salvation Army, and other RRH programs are available throughout the CoC for individuals and households who cannot be served by the Salvation Army. Permanent Supportive Housing is provided by Community Assisted and Supported Living and provides permanent housing units for persons who are chronically homeless. These resources are funded through a variety of federal, state, and local funding sources, and are responsible for adhering to CoC written standards. The CoC regularly reviews project and system level performance data to determine if existing services and facilities are meeting the needs of individuals and families who are homeless.

In addition to annual federal ESG funding for street outreach and rental assistance, the County is also planning to use ESG-RUSH funding for rental assistance (Tenant-Based Rental Assistance/Rapid Rehousing) to address the increase in homelessness resulting from Hurricane Ian.

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

# Introduction

This section describes facilities and services that assist persons who are not homeless but require supportive housing and programs. These populations may include elderly and frail elderly, persons with disabilities, persons with alcohol or drug addictions, persons with HIV/AIDS, or other groups. Such facilities and services include units that are barrier-free and physically accessible, units with on-site supportive services such as case management, counseling and healthcare, and units that are affordable to persons on a fixed or limited income.

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

Lee County Partnering for Results funding through Lee County Human and Veteran Services targets adults and children with physical and developmental disabilities and the elderly. The goal for these priority areas is to assist special populations to attain, restore or preserve their highest potential of functional abilities, independence and remain living in the least restrictive setting. Services provided include life skills training, vocational training, home-based services including services to support caregivers, professional therapies to enhance physical and/or developmental abilities, work related programs - job readiness/placement/retention and resource coordination (including case management).

Human and Veteran Services has a strong partnership with Goodwill Industries of Southwest Florida whose mission is to build lives, families, and communities--one job at a time by helping people with disabilities and disadvantages overcome their barriers to employment and independence. Their Job-Link centers provide job skills training, vocational training and have computer access so that clients can look for a job and submit online resumes and applications. Many computers are equipped with adaptive technology to assist people with disabilities. In addition, referrals are provided to family strengthening services through partnerships with numerous community agencies. These services address soft skills issues such as: dressing for success, resume preparation, and interviewing. They also collaborate with successful retail stores in order to provide retail training including customer service, merchandising, loss prevention, currency tendering, and inventory. Barrier-free housing for persons with physical disabilities is also available through Goodwill.

To address the critical need of affordable rental housing for the elderly, persons with disabilities, persons with HIV/AIDS, and persons with substance use disorders in Lee County, Human Services partners with a variety of non-profit organizations which provide treatment, supportive services, and housing assistance. Such agencies include SalusCare, Catholic Charities, Habitat for Humanity, Protected Harbor, and others. In addition, Human and Veteran Services provides direct services to persons with

HIV/AIDS through the HOPWA program and persons who are homeless are provided services through various housing programs.

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

Households with mental or physical health issues face barriers to safe, decent and affordable housing. Often, persons with mental or physical issues are discharged from institutions but are then unable to find independent housing that they can afford or reasonably maintain. Many homeless people are discharged from institutions with no other housing options.

Discharge planning agreements are in place with mental and physical health providers in Lee County to ensure that persons exiting these facilities receive appropriate housing. Housing and support services are provided through multiple community partnerships. These partnerships include agencies such as the following:

HOPE Clubhouse provides a rehabilitation program for people living with mental illness to help members reintegrate back to the workforce.

The Florida Assertive Community Treatment Team (FACT) promotes, develops, and supports high quality assertive community treatment services that improve the lives of people with serious and persistent mental illness by supporting recovery and empowerment through collaborating, self-determination, and personal choices. The FACT Team assists persons with severe and persistent mental illness who do not respond to traditional services such as outpatient or day treatment. Individualized care includes activities and life skills case management, housing assistance, individual and group therapy, linkage to primary care and dental services, medication management, psychiatric services, and vocational assistance.

The National Alliance on Mental Illness (NAMI) offers timely information and an array of mental health peer education, training programs, and support services for people with a mental illness, family members, providers, and the public. The education and support programs provide relevant information, valuable insight, and the opportunity to engage in support networks and the information and referral coordinators answer questions about local services and provide support concerning mental wellness.

SalusCare provides case management for children and adults, in-home therapeutic services, Functional Family Therapy, Therapeutic Behavioral On-Site Services, Supported Employment for adults, Forensic Diversion Services for those involved in the criminal justice system, outpatient psychiatric, and outpatient therapy services. SalusCare also provides effective, affordable and comprehensive care to individuals and families impacted by addiction and other problem behaviors. Services provided range from outpatient treatment and day treatment to a more intensive residential program with continuing care in a transitional facility. Patients also are offered education, group, individual and family therapy, as well as life skills classes, based upon each person's needs and abilities.

The Center for Progress and Excellence operates a mobile crisis unit that provides access to a mental health specialist to resolve immediate crisis 24 hours a day 7 days a week.

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

Lee County plans to continue existing partnerships with organizations that provide housing and supportive services to persons who are not homeless but have other special needs. In addition, Lee County plans to continue funding (as financially feasible) housing and programs that assist these individuals and families. Activities such as non-profit capital improvement and non-profit housing development will assist partner organizations to increase capacity to provide housing and services. Additional programs such as Lee County's Partnering for Results and state mandated activities will continue to assist this population.

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

One-year goals include the continuation of non-profit capital improvement activities. These activities have been funded by Lee County throughout the previous Consolidated Plan and will only be funded when serving an eligible LMA neighborhood, as qualified by LMISD and consistent with the requirements of the CDBG program. Given the need for increased housing, Lee County will also be placing special emphasis on affordable housing construction, rehabilitation and assistance; Rental and Down Payment Assistance and housing counseling to help house those in need and to keep people housed.

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

## Negative Effects of Public Policies on Affordable Housing and Residential Investment

This section requires the jurisdiction to explain whether the cost of housing or the incentives to develop, maintain, or improve affordable housing are affected by public policies, particularly those of the local jurisdiction. Such policies include land use controls, zoning ordinances, building codes, and policies that affect the return on residential investment.

The current Analysis of Impediments to Fair Housing for Lee County (2019-2023), which is in the process of being updated as the Housing Equity Plan, identifies a number of local barriers. Many of these were noted in the previous Consolidated Plan update, which identified barriers based on race, national origin, and/or disability; Ioan application denial rates (lower for White applicants than for other races/ethnicities), opposition to public housing development, insufficient accessible housing units, insufficient transportation system, and inequitable geographic distribution of public housing units. Plan goals and projects will attempt to address these barriers. An example of such a project may include housing rehabilitation, where the scope of work may address the accessibility of a unit.

Regional barriers to affordable housing as identified in the 2019-2023 Analysis of Impediments to Fair Housing Choice, which is in the process of being updated as the Housing Equity Plan, include but are not limited to:

- Housing discrimination persists in the private market
- Pattern of disparity continues to exist in private mortgage lending for racial and ethnic minorities
- Limited public transit options and rising cost of transportation
- Insufficient number of accessible housing units that meet the need of disabled citizens
- Fair Housing education, training and outreach programs are inadequate
- Neighborhood opposition to diversity in housing type

In general, Lee County will continue to work with non-profit housing developers and providers to increase the amount of affordable housing and address the regional impacts and barriers to affordable housing in the county.

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

## Introduction

The Consolidated Plan identifies the priority non-housing community development needs that are eligible for assistance during the next five-year period. The following subsection describes the non-housing community development assets of the Lee County, specifically, to identify such needs. All data for this section is for Lee County as a whole (including Cape Coral and Fort Myers).

## **Economic Development Market Analysis**

This section provides socioeconomic data regarding Lee County and compares the ability of the local workforce to satisfy the needs of local businesses. This data can also be used to describe the workforce housing demand in the local market.

This section discusses the following topics:

- Business by Sector
- Labor Force
- Occupations by Sector
- Travel Time to Work
- Educational Attainment
- Median Earnings in the Past 12 Months
- Additional Narrative

### **Business Activity**

Business by Sector	Number of Workers	Number of Jobs	Share of Workers %	Share of Jobs %	Jobs less workers %
Agriculture, Mining, Oil & Gas Extraction	2,523	2,795	1	1	0
Arts, Entertainment, Accommodations	39,838	37,172	12	14	2
Construction	39,129	32,475	12	12	0
Education and Health Care Services	64,741	57,293	20	22	2
Finance, Insurance, and Real Estate	21,888	13,015	7	5	-2
Information	5,348	3,165	2	1	-1
Manufacturing	11,198	6,567	3	3	0
Other Services	16,176	8,596	5	3	-2
Professional, Scientific, Management	41,406	37,515	13	14	1
Services					
Public Administration	10,529	11,888	3	5	2
Retail Trade	46,949	36,284	15	14	-1
Transportation and Warehousing	16,240	5,995	5	2	-3
Wholesale Trade	7,313	7,383	2	3	1
Total	323,278	260,143			

Table 42 - Business Activity

Alternate Data Source Name:

2016-2020 ACS

Data Source Comments:

2016-2020 ACS (Workers), 2020 Longitudinal Employer-Household Dynamics (Jobs). Lee County as a whole (including Cape Coral and Fort Myers).

#### **Business Activity**

Information provided in **Table 42** identifies workers and jobs by labor sector within Lee County as a whole (including Cape Coral and Fort Myers). This information is divided into 13 sectors by number of workers and number of jobs and then calculates the ratio of workers to jobs by labor sector. The most recent comparable datasets are the 2016-2020 ACS and 2020 Longitudinal Employer-Household Dynamics data published by the U.S. Census Bureau. According to the 2016-2020 ACS, there are 323,278 workers within all sectors identified in the county. The number of jobs within all sectors is estimated to be 260,143.

The largest share of workers is the Education and Health Care Services sector, which represents 20% of all workers. Retail Trade (15%); Professional, Scientific, Management Services (13%); Arts, Entertainment, and Accommodations (12%); and Construction (12%) are also well-represented. The least represented sector is Agriculture, Mining, Oil & Gas Extraction with an estimated 2,523 workers (i.e., less than 1% of workers).

Similarly, the largest share of jobs is the Education and Health Care Services sector, which represents 22% of all workers. Retail Trade (14%); Professional, Scientific, Management Services (14%); Arts,

Entertainment, and Accommodations (14%); and Construction (12%) are also well-represented. The least represented sector is Agriculture, Mining, Oil, & Gas Extraction with 2,795 jobs (i.e., approximately 1% of jobs).

When comparing the share of jobs to the share of workers, the distribution of sectors is very similar. The calculation of "jobs less workers" is the percentage of jobs minus the percentage of workers, which reveals surplus or deficiency of labor supply for certain sectors. A negative number reflects a surplus, or oversupply, of workers for the labor sector. As **Table 42** shows, Lee County has fewer jobs than workers in 5 of the 13 labor sectors identified. This means that workers in these labor sectors may have difficulty finding and competing for employment among other workers with the same skillset in the county, or these workers are employed outside the Lee County limits (e.g., commute regionally). The labor sectors where a surplus or oversupply of labor does not exist are Arts, Entertainment, and Accommodations; Education and Health Care Services; Professional, Scientific, Management Services; Public Administration; and Wholesale Trade. For these sectors, the deficit in labor supply must be met by workers from outside the Lee County limits. Agriculture, Mining, Oil & Gas Extraction; Construction; and Information has neither a surplus nor a deficit.

### Labor Force

Total Population in the Civilian Labor Force	348,021
Civilian Employed Population 16 years and over	332,507
Unemployment Rate	4.5%
Unemployment Rate for Ages 16-24	8.6%
Unemployment Rate for Ages 25-64	3.8%

Table 43 - Labor Force

Alternate Data Source Name:

2018-2022 ACS

Data Source Comments:

2018-2022 ACS, Data Tables DP03 and B23001. Lee County as a whole (including Cape Coral and Fort Myers). *Unemployment rate in this table is from 25-64 years.

#### Labor Force

**Table 43** portrays the labor force within Lee County. According to the 2018-2022 ACS, the total population in the civilian labor force is 348,021. This number included the number of civilian workers plus those actively seeking employment and does not include those who are not actively seeking employment. The civilian population 16 years and over that is employed totals 332,507. According to the 2018-2022 ACS, Lee County's unemployment rate is 4.5%, or approximately 15,500 persons. The unemployment rate for ages 16-24 is much higher at 8.6%, while the unemployment rate for ages 25-64 is much lower at 3.8%.

#### **Occupations by Sector**

Occupations by Sector	Number of People
Management, business and financial	48,541
Farming, fisheries and forestry occupations	1,124
Service	65,440
Sales and office	81,133
Construction, extraction, maintenance and	
repair	26,076
Production, transportation and material	
moving	33,399

Table 44 – Occupations by Sector

Alternate Data Source Name:

2018-2022 ACS

Data Source Comments: 2018-2022 ACS, Data Table: S2401. Lee County as a whole (including Cape Coral and Fort Myers).

#### **Occupations by Sector**

**Table 44** displays the number of people in occupations by sector within the Lee County as a whole (including Cape Coral and Fort Myers), according to the 2018-2022 ACS. The data is based on the civilian employed population age 16 years and over. The most represented occupations are Sales and Office (81,133 people), Service (65,440 people), and Management, business and financial (48,541 people. The least represented sector is Farming, Fisheries, and Forestry Occupations with 1,124 people. Of these occupations for Lee County, median earnings are highest in the management, business and financial occupations (\$67,927) and computer, engineering, and science occupations (\$64,188), whereas median earnings are lowest in the service sector occupations (\$25,489).

### **Travel Time**

Travel Time	Number	Percentage
< 30 Minutes	163,369	56.5%
30-59 Minutes	102,327	35.4%
60 or More Minutes	23,368	8.1%
Total	289,064	100.0%

Table 45 - Travel Time

Alternate Data Source Name: 2018-2022 ACS

Data Source Comments: 2018-2022 ACS, Data Table: B08012. Lee County as a whole (including Cape Coral and Fort Myers).

### **Travel Time**

As shown in **Table 45**, the majority (56.5%) of Lee County (as a whole including Cape Coral and Fort Myers) residents commute less than 30 minutes to work. A third (35.4%) commute 30-59 minutes to work. Approximately 8% (8.1%) commute more than 60 minutes to work. The average travel time to work is 27.9 minutes. Approximately 75% (74.8%) of workers age 16 years and over drive to work alone, 9.6% carpool, 0.5% percent use public transit, 11.4% worked from home, and less than 4% (3.6%) traveled by other means (e.g., walk, bicycle, taxi, motorcycle, etc.).

## Education:

Educational Attainment by Employment Status (Population 16 and Older)

Educational Attainment	In Labo		
	Civilian Unemployed		Not in Labor
	Employed		Force
Less than high school graduate	23,857	1,234	14,558
High school graduate (includes	77,311	3,659	29,292
equivalency)			
Some college or Associate's degree	84,173	3,575	23,327
Bachelor's degree or higher	76,853	1,996	19,982

Table 46 - Educational Attainment by Employment Status

Alternate Data Source Name: 2018-2022 ACS

Data Source Comments: 2018-2022 ACS, Data Table: B23006. Lee County as a whole (including Cape Coral and Fort Myers).

### **Educational Attainment by Employment Status**

**Table 46** displays educational attainment by employment status. Within Lee County, the largest share of the employed population has some college or an Associate's degree (23.4%). Those with at least a high school diploma or equivalency (21.5%) and those with a Bachelor's degree or higher (21.3%) represent similar shares of the employed population. Those that did not graduate from high school or without a high school equivalency represent the smallest share of the employed population. Less than a tenth (6.6%) of the unemployed population has less than a high school diploma.

#### **Educational Attainment by Age**

	Age				
	18–24 yrs	25–34 yrs	35–44 yrs	45–65 yrs	65+ yrs
Less than 9th grade	938	2,602	2,876	3,921	3,086
9th to 12th grade, no diploma	4,394	3,537	3,339	6,663	4,656
High school graduate, GED, or	11,130	14,289	13,704	31,769	26,978
alternative					
Some college, no degree	8,054	8,348	8,131	19,824	21,342
Associate's degree	2,266	3,532	3,672	8,946	7,564
Bachelor's degree	1,597	7,221	6,189	14,675	23,198
Graduate or professional degree	126	2,384	2,891	9,306	19,253

Table 47 - Educational Attainment by Age

Alternate Data Source Name:

2018-2022 ACS

Data Source Comments: 2018-2022 ACS, Data Table: B15001. Lee County as a whole, including Cape Coral and Fort Myers.

#### **Educational Attainment by Age**

**Table 47** shows educational attainment by age. A small share of Lee County as a whole, including Cape Coral and Fort Myers, population over the age of 18 did not graduate from high school (11.5%). Approximately half (52.4%) of adults graduated from high school or have some college education but no college degree. Combined, 63.9% of the population 18 years or older do not have a college degree. In contrast, 36.1% of the population has a college degree at some level with 8.3% having an Associate's degree and 27.8% having a Bachelor's degree or higher.

#### Educational Attainment - Median Earnings in the Past 12 Months

Educational Attainment	Median Earnings in the Past 12 Months
Less than high school graduate	29,263
High school graduate (includes equivalency)	35,621
Some college or Associate's degree	40,432
Bachelor's degree	53,987
Graduate or professional degree	67,635

Table 48 – Median Earnings in the Past 12 Months

Alternate Data Source Name: 2018-2022 ACS

 Data Source Comments:
 2018-2022 ACS, Data Table: S1501 (Population 25 years and over with earnings). Lee County as a whole, including Cape Coral and Fort Myers.

### Median Earnings in the Past 12 Months

**Table 48** identifies income over a 12-month period related to educational attainment in Lee County as a whole including Cape Coral and Fort Myers. The data is sourced from the 2018-2022 ACS. Greater educational attainment strongly correlates with increased income over a 12-month period. In Lee County, persons having a graduate or professional degree have an estimated median income of \$67,635, and persons having a Bachelor's degree have a median income of \$53,987. In contrast, persons with some college or an Associate's degree have a median income of \$40,432 which is just slightly greater than those with a high school diploma or equivalency. However, in contrast, persons without a high school diploma or equivalency.

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

The major employment sectors (i.e., jobs provided) in Lee County were:

- Education and Health Care Services = 57,293
- Professional, Scientific, Management Services = 37,515
- Arts, Entertainment, Accommodations = 37,172
- Retail Trade = 36,284

Combined, these employment sectors represent approximately 77% of all available jobs in Lee County.

### Describe the workforce and infrastructure needs of the business community.

The data show there may be more jobs than workers in five employment sectors: Arts, Entertainment, Accommodations; Education and Health Care Services; Professional, Scientific, Management Services; Public Administration; and Wholesale Trade. For these five sectors, the deficit in labor supply is being met by workers from outside the Lee County limits which signifies either a need for skilled workers within the community or that workers in these sectors cannot afford to live within the Lee County limits.

Since a significant percentage (52.4%) of Lee County's adult population lacks a college education, there may be a demand for adult basic education, workforce training and other education opportunities to better match the needs of employers with employees skilled in areas such as Arts, Entertainment, Accommodations; Education and Health Care Services; Professional, Scientific, Management Services; Public Administration; and Wholesale Trade. Education and Health Care Services; Professional, Scientific, Management Services; and, Public Administration jobs, in particular, typically require an Associate's degree or higher, whereas jobs in other sectors where an oversupply of labor exists only require a high school diploma or equivalency. With that, there are several private and public educational institutions, as well as workforce training initiatives available in the greater Lee County area to address this need.

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

### **Economic Impact of Hurricane Ian**

In September of 2022, Hurricane Ian made landfall as a Category 4 hurricane. According to the Lee County 2023 CDBG-DR Action Plan, Amendment 4, the Lee County Economic Development Director stated that a week after Hurricane Ian, 98% of all the businesses on Fort Myers Beach were closed, 98% of the businesses on Sanibel were closed, 96% of the businesses on Pine Island were closed, 45% of the businesses in North Fort Myers were closed and, 38% of the businesses in Cape Coral were closed. However, 6 months after the hurricane, the County was about to see 18,000 jobs added back to the county. Lee County also took a hit on revenues generated from tourism with an average reduction of 44.5% of revenue in Q1 and Q2 in 2023. The State of Florida implemented the Rebuild Florida program in response to Hurricane Ian. Rebuild Florida is a long-term recovery effort to repair and rebuild thousands of homes that were affected by Hurricane Ian. Many homes and vulnerable citizens continue to seek assistance in Lee County.

### **Planned Initiatives**

According to Lee County's Comprehensive Plan (Lee Plan), the County has an objective to create community plans that address specific conditions unique to a defined area of the county. The County currently has 14 community plans. A community plan is a goal in the Lee Plan specific to a defined area of the county with long term community objectives and policies. The Lee Plan states that the County will coordinate community plans with countywide and regional plans with respect to population accommodation, transportation, employment, economic development, and infrastructure needs in an effort to avoid inconsistencies. Community plans must address specific conditions unique to a defined area of the county. Conditions may be physical, architectural, historical, environmental or economic in nature. Community plans should consist of long-term objectives and policies that are not regulatory in nature. If needed, land development regulations may be adopted to implement the community plans.

Ft. Myers (Fort Myers Community Redevelopment Agency) and Cape Coral (Cape Coral Community Redevelopment Agency) both have CRAs. However, there are no CRAs in unincorporated Lee County.

### Response Continued Below (See "Major Changes and Economic Impact")

Major Changes and Economic Impact (Continued)

### Jobs/Business Opportunities

Lee County Economic Development's website states, that in 2018, 15 census tracts throughout Lee County were designated as Opportunity Zones. These zones are economically distressed communities where new investments, under certain conditions, may be eligible for preferential tax treatment.

Opportunity Zones are designed to spur economic development by providing tax benefits to investors. Investors can defer tax on any prior gains invested in a Qualified Opportunity Fund (QOF). If the investor holds the investment in the Opportunity Fund for at least ten years, the investor is eligible for an increase in basis of the QOF investment equal to its fair market value on the date that the QOF investment is sold or exchanged.

Opportunity Zones are designed to incentivize new equity investments in low-income communities nationwide. All of the underlying incentives relate to the tax treatment of capital gains, and all are tied to the longevity of an investor's stake in a qualified Opportunity Fund.

### Workforce Development

The Lee County Economic Development Office collaborates with community partners to offer Workforce Training and Certification programs and a Small Business Technical Assistance Program to assist people, businesses and organizations in response to COVID-19.

The Workforce Training & Certification Program officers micro and rapid credentialing programs in response to the education and skills deficiency for disproportionately affected communities exacerbated by COVID-19. Tuition assistance and scholarships paid through \$3 million in the American Rescue Plan Act (ARPA) funds will be available for in-demand programs in areas such as health care, real estate/construction and technology.

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

There is a potential surplus or oversupply of labor in 5 of the 13 employment sectors identified, which include Arts, Entertainment, Accommodations; Education and Health Care Services; Professional, Scientific, Management Services; Public Administration; and Wholesale Trade. Five employment sectors have a deficit of labor that may afford some job opportunities for local residents: Finance, Insurance, and Real Estate; Manufacturing; Other Services; Retail Trade; and Transportation and Warehousing. Of the unemployed labor force in the county, 44.9% have some college or an Associate's degree. Of the total population age 18 and older, only 36.1% have an Associate's degree or higher.

The workforce would benefit from relevant job training for the businesses located in Lee County. Public input received during the three public meetings in February thru March 2024, online survey, Focus Group consultation meeting, and Community Action Agency (CAA) public hearing regarding economic

and community development emphasized the need for retaining and keeping jobs in Lee County; education, workforce prep, and job skills training; redevelopment of vacant and/or abandoned properties; code enforcement/blight removal; and new job creation/small business incubation.

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

The assessment of business' current and future needs is key to regional economic and business success. By using data collected by the Department of Economic Opportunity, Labor Market Statistics; Department of Economic Opportunity, Bureau of Workforce Statistics & Economic Research; and, regional and local surveys, the Southwest Florida Workforce Development Board and its CareerSource Southwest Florida partner with educational providers to assure workforce-training opportunities are available. Skills training and skill upgrading is a continuous project so that the worker and future employee meet business' needs. Collaborating with educators who guide participants through approved curriculum is as important as the efforts resulting in credentialing, diplomas and degrees.

CareerSource centers offer workforce, foundational skills training so individuals are able to recognize behavioral skills desired by local employers - teamwork, timeliness, etc. They also provide career counseling, skills training, job search assistance, industry partnerships, and mentoring programs.

Each year the Southwest Florida Workforce Development Board examines occupations that are considered high skill, high wage occupations and are projected to be in-demand and research training opportunities that align with those occupations. Updated lists of occupations and training providers are published, uploaded, and distributed throughout the community. CareerSource Southwest Florida center staff and educators are informed of changes so that information and referrals to customers are correct. Citizens are informed of Labor Market trends, occupational skill demands, and training providers to make an informed decision. Individuals with upgraded skills are referred to local employers and job banks to secure employment opportunities.

In addition, businesses are offered opportunities through the Business Services at the CareerSource Southwest Florida centers. Businesses can take advantage of the no-cost services available by posting job openings and allowing Career Development Professionals to screen and refer potential candidates. Assistance to individuals and businesses in identifying cost saving employment programs that can provide tax credits, employee benefits, on-the-job training, and skill gap education. On-site recruitment facilities as well as executive search, family relocation assistance, industry surveys, labor market information, and professional career network opportunities are available.

Education Fairs, Hiring Events and Regional Career Fairs are available to business and job seeker customers and information is dispersed through regional media sources and partners.

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

Yes

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

Lee County's Economic Development Department has many initiatives that impact economic development.

Among these initiatives are expanding access to capital for Lee County businesses at all stages of the company lifecycle, improving the connectivity of veterans to entrepreneurial and small business assistance, and working to connect tech industry professionals with civic engagement through Code for America. These initiatives are facilitated through the identification and participation of local industry representatives and partner organizations to create actionable programs and improve connectivity to resources.

There are numerous other local and regional plans that are in various stages of implementation that impact economic growth, including the Lee Plan, a comprehensive community development plan that was revised in 2024 and will become the New Horizon 2035 Plan. This Plan's goals, objectives, and policies will be using a sustainable vision for growth and development through 2035. The plan has been developed through 40 community workshops and includes initiatives for making Lee County an economically and environmentally desirable place to live, work and visit.

Another initiative is the alignment of economic development incentives with designated Opportunity Zones. In 2018, 15 census tracts throughout Lee County were designated as Opportunity Zones. These zones are economically distressed communities where new investments, under certain conditions, may be eligible for preferential tax treatment. The Lee County EDO has created an integrated Geographic Information Systems based portal to provide information on the Opportunity Zones and related programs to investors and businesses.

# Discussion

According to the 2018-2022 ACS, the Lee County civilian labor force, as a whole (excluding the cities of Cape Coral and Fort Myers) is comprised of approximately 348,021 people of which approximately 95.5% are employed and 4.5% are unemployed. The largest employment sectors are Education and Health Care Services; Professional, Scientific, Management Services; Arts, Entertainment, Accommodations; and Retail Trade.

As in most counties, higher median earnings generally correlate with higher education. In Lee County, as a whole, persons having a graduate or professional degree have an estimated median income of \$67,635 while persons without a high school diploma or equivalency have a median income of only \$29,263.

Approximately half (52.4%) of Lee County's adult population, as a whole, have a high school diploma or equivalent, or some college education, but no degree whereas 36.1% of the County's adult population have a college degree at some level. Only 11.5% have no high school diploma or equivalent. While there is need for workforce training and education to at least the Associate's degree level, there are also several workforce training initiatives in the county area to meet this need.

Approximately 57% (56.5%) of Lee County's population, as a whole, drive less than 30 minutes to get to work and approximately 92% (91.9%) of the County's population drive less than one hour to get to work. This means that most employees live locally or within the county.

# MA-50 Needs and Market Analysis Discussion

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

The lowest income areas of Lee County are most affected by housing problems and in need of community investment. Unfortunately, these areas are widespread. Data regarding low- and moderate-income population was sourced from HUD's FY 2023 Low- and Moderate-Income Summary Data (LMISD) published on July 27, 2023. As defined by HUD, income-eligible areas are those where 51% or more of the population is low- and moderate-income. Approximately one-third (120 or 31%) of the 383 LMISD block groups in the Urban County grantee geography (i.e., Lee County less the cities of Cape Coral and Fort Myers) have a low- and moderate-income population of 51% or more. These block groups are distributed throughout unincorporated Lee County and Urban County municipalities. See **Map 1** (section **NA-05)** for low- and moderate-income block groups.

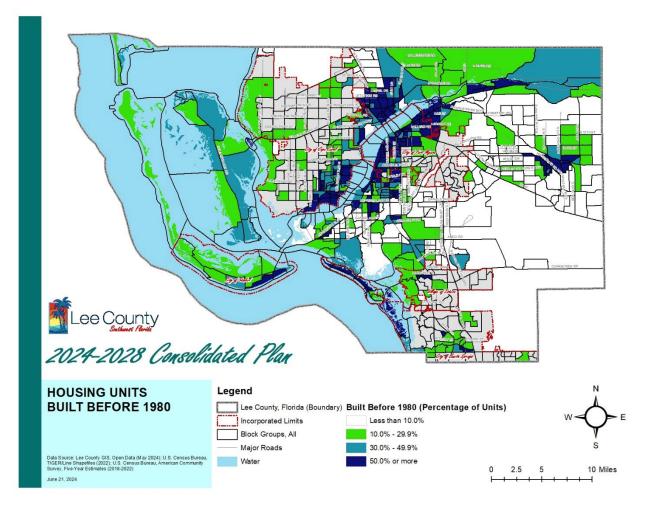
In the past five years, Lee County has focused housing and community development activities in areas of low- and moderate-income concentration. Generally, these same areas are also disproportionately affected by housing problems, such as overcrowding, substandard conditions, or significant cost burden. Given that the majority of Lee County's housing stock was built after 1980 (78%), housing problems are more common in units built prior to 1980 that are over 40 years old. Only 22% of Lee County's housing stock was built prior to 1980 (an estimated 92,754 units) (see **Map 2**). According to the 2018-2022 ACS, an estimated 32% (99,028) of Lee County's occupied housing units have one housing problem. In contrast, only 1% (4,403) of occupied housing units have multiple (i.e., two or more) housing problems. More than half (67% or 207,917) of occupied housing units have no housing problems. (2018-2022 ACS, B25123)

**Table 49** and **Map 3** show Census Tracts with concentrations of multiple housing problems (i.e., two or more problems), many of which align with low- and moderate-income areas in Lee County. For this analysis, "concentration" is defined where the percentage of occupied housing units with multiple housing problems is 10 percentage points higher than the jurisdiction as a whole (11%).

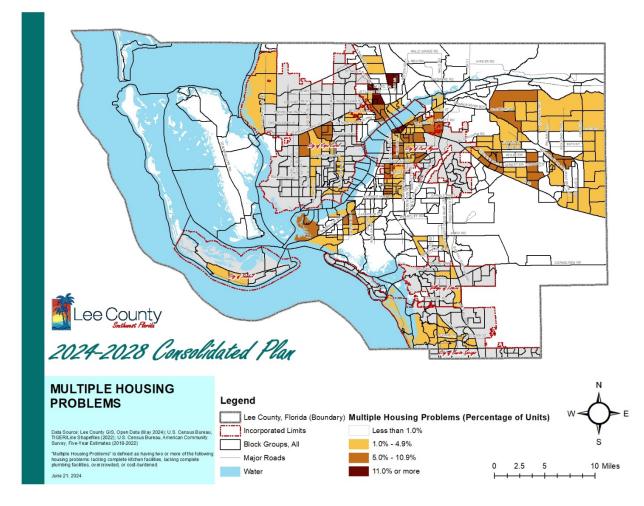
Countywide, three Census Tracts meet this definition of concentration (11% or higher): 203.02, 208.02, and 803 (2022 ACS). However, only two of these Census Tracts are located with the unincorporated Lee County or Urban County municipalities. These concentrations of multiple housing problems generally correspond to Census Tract 203, Block Groups 1 and 2; and Census Tract 208, Block Groups 1, 5, and 6 (2023 HUD LMISD, 2011 ACS). Of these only Census Tract 208.02 overlaps with concentrations of minority racial or ethnic groups (43% Racial Minority and 42% Hispanic or Latino).

Within unincorporated Lee County and Urban County municipalities, the tract-level percentage of units affected by multiple housing problems ranges from less than 1% to 13%. In comparison, occupied units with only one housing problem are distributed throughout Lee County and within every Census Tract of

unincorporated Lee County and Urban County municipalities, with the tract-level percentage of affected units ranging from 9% in Census Tract 12.08 to 100% in Census Tract 401.39.



Map 2 – Housing Units Built Before 1980



Map 3 – Multiple Housing Problems

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

An area of concentration is defined herein as an area where a certain group (racial, ethnic, or income) comprises a percentage of the population that is 10 percentage points higher than the jurisdiction as a whole. Several Block Groups meet this definition for race or ethnicity.

Lee County has a Black/African American population of 8% countywide. Eighty (80) Block Groups in 47 Census Tracts [3.03, 3.05, 5.02, 5.03, 5.04, 6, 7, 8, 10.01, 10.02, 11.01, 11.04, 12.03, 12.04, 12.05, 12.09, 14.01, 15.02, 17.09, 102.07, 104.20, 105.04, 108.02, 201.02, 401.09, 401.20, 401.21, 401.22, 401.24, 401.26, 402.05, 402.10, 402.11, 402.12, 403.01, 403.02, 403.03, 403.04, 403.10, 403.11, 403.12, 403.13, 403.15, 501.05, 801, 803, and 901] have a Black/African American population of 18% or more according to the 2018-2022 ACS indicating areas of racial concentration. Of these, only five Census Tracts contain Block Groups with a Black/African American population of 51% or more [5.02, 5.03, 6, 7, and 401.22]. The greatest concentration of Black/African American population is within or near the City of Fort Myers. However, similar concentrations also exist in unincorporated Lee County generally north of State Road 82 between Buckingham Road and Bell Boulevard/Joel Boulevard (e.g., Census Tract 401.22, Block Group 4, 56%).

If all minority races are considered, Lee County has a racial minority population of 26% countywide. Over 100 (132) Block Groups in 76 Census Tracts [3.03, 3.05, 3.06, 4.01, 5.02, 5.03, 5.04, 6, 7, 10.01, 10.02, 11.01, 11.03, 11.04, 12.03, 12.04, 12.05, 12.09, 13, 14.01, 15.02, 16.01, 19.17, 101.06, 101.07, 101.11, 102.03, 102.06, 102.07, 102.08, 103.06, 104.20, 104.21, 105.04, 106.02, 108.02, 204, 208.02, 401.09, 401.20, 401.21, 401.22, 401.24, 401.25, 401.26, 401.27, 401.33, 401.34, 401.38, 402.05, 402.07, 402.10, 402.11, 402.12, 403.01, 403.02, 403.03, 403.04, 403.08, 403.10, 403.11, 403.12, 403.13, 403.14, 403.15, 403.16, 502.05, 502.06, 502.08, 503.17, 504.01, 505.02, 506.01, 506.03, 801, and 901] have a racial minority population of 36% or more according to the 2018-2022 ACS indicating areas of racial concentration. Of these, 37 Census Tracts contain Block Groups with a racial minority population of 51% or more. The greatest concentration of racial minority population is within or near the City of Fort Myers. Similar concentrations also exist in unincorporated Lee County, generally north of State Road 82 and east of Buckingham Road, in the unincorporated areas of North Fort Myers, and between the City of Fort Myers and the Village of Estero.

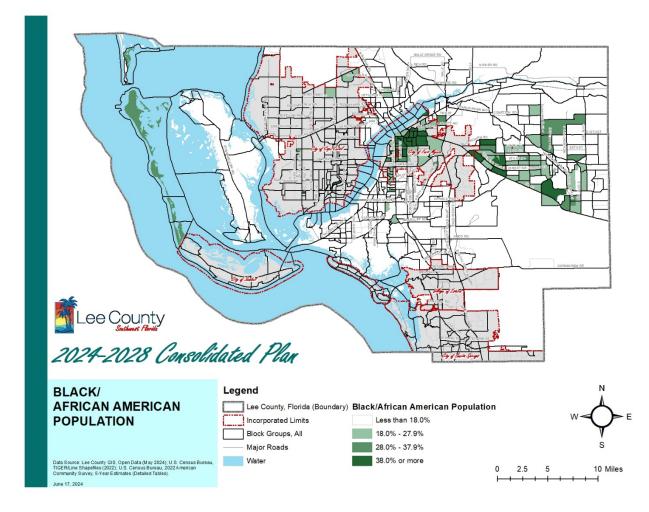
# Response Continued Below (See "Concentrations of Racial or Ethnic Minorities or Low-Income Families")

### Concentrations of Racial or Ethnic Minorities or Low-Income Families (Continued)

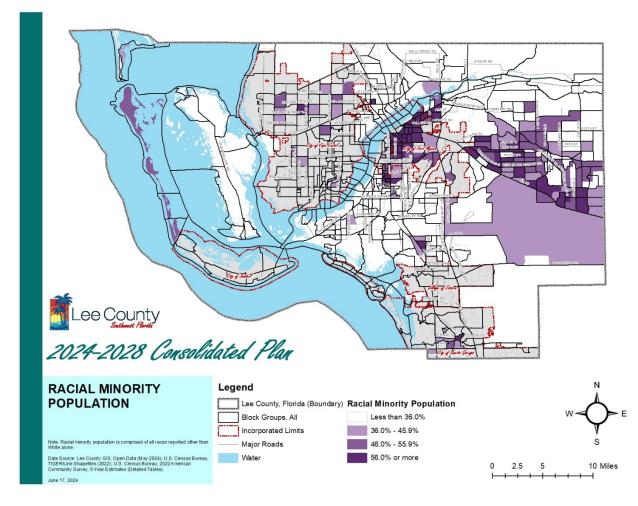
Additionally, many Census Tracts meet the definition for ethnicity. Lee County has a Hispanic population of 23% countywide. Over 100 (145) Block Groups in 84 Census Tracts [3.03, 3.05, 3.06, 4.01, 5.03, 5.04, 6, 10.02, 11.01, 12.03, 12.05, 12.06, 13, 14.01, 15.02, 16.01, 19.17, 101.06, 101.7, 101.08, 101.10, 101.11, 101.13, 102.03, 102.05, 102.07, 102.08, 103.02, 103.03, 103.03, 103.06, 103.07, 104.04, 104.11, 104.12, 104.18, 104.21, 106.01, 106.02, 108.02, 206, 208.02, 302.02, 401.09, 401.21, 401.22, 401.24, 401.25, 401.26, 401.27, 401.34, 401.38, 402.05, 402.07, 402.08, 402.09, 402.10, 402.12, 403.01, 403.02, 403.03, 403.04, 403.05, 403.08, 403.10, 403.11, 403.12, 403.13, 403.14, 403.15, 403.16, 502.05, 502.06, 502.08, 502.13, 503.17, 503.18, 504.1, 504.02, 505.01, 505.02, 506.01, 506.03, and 701.01] have a Hispanic population of 33% or more according to 2018-2022 ACS indicating areas of ethnic concentration. Of these, 41 Census Tracts contain Block Groups with a Hispanic population of 51% or more. The greatest concentration of Hispanic population is in unincorporated Lee County outside the City of Fort Myers and generally north of State Road 82 and east of Buckingham Road, as well as unincorporated areas in North Fort Myers, and between the City of Fort Myers and the Village of Estero. Some concentrations of Hispanic population overlap with racial minority population particularly in the unincorporated areas.

Many of the areas identified as having high concentrations of minority racial or ethnic groups (see **Map 4**, **Map 5**, and **Map 6**) also have a high percentage of low- or moderate-income households at the blockgroup level (see **Map 1**). Although these concentrations exist, the data provided in the Market Analysis show that all residents of low- and moderate-income, regardless of race or ethnicity, may have significant housing needs.

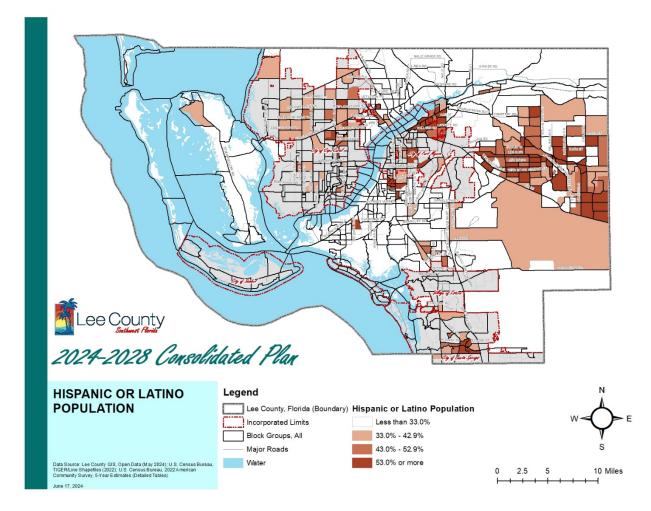
It is important to note that while there are concentrations of minority racial or ethnic groups in Lee County, there are no HUD-designated Racially or Ethnically Concentrated Areas of Poverty (R/ECAPs) in unincorporated Lee County or Urban County municipalities.



Map 4 – Black/African American Population



Map 5 – Racial Minority Population



Map 6 – Hispanic or Latino Population

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

Neighborhoods with concentrations of housing problems overlap with concentrations of low- and moderate-income population and/or racial or ethnic minorities in two Census Tracts containing five Block Groups: Census Tract 203, Block Groups 1 and 2; and, Census Tract 208, Block Groups 1, 5, and 6 (2023 HUD LMISD, 2011 ACS). See **Table 49**. A significant percentage of the population in these neighborhoods is living below poverty level (16.3% and 36.6%, respectively). For reference, Lee County as a whole has a poverty level of 11.7%. (2022 ACS)

These neighborhoods are concentrated in North Fort Myers in unincorporated Lee County, generally north of Bayshore Rd. and south of Del Prado Blvd., between U.S. 41/Tamiami Trail and Slater Rd. One of these neighborhoods, Palmona Park, is adjacent to North Fort Myers Community Park/Recreation Center/Public Library complex and the other neighborhood, Suncoast Estates, is located between Prairie Pines Preserve and Powell Creek Preserve. Both neighborhoods are characterized by smaller lots and an older housing stock. Many properties have depressed property values in comparison to similar properties in other neighborhoods. Due to the proximity of U.S. 41/Tamiami Trail, there is sporadic commercial and industrial development along with a number of RV and mobile home parks in the area. While providing some employment assets, the surrounding development pattern is not conducive to pedestrian movement and would be inaccessible to transportation disadvantaged persons if not for public transit. Public transit, provided by Lee Tran via the Merchants Crossing Circulator, is available along major roads and the transportation network is largely grid-based in both Palmona Park and Suncoast Estates.

### Are there any community assets in these areas/neighborhoods?

Existing community assets in low- and moderate-income neighborhoods in unincorporated Lee County and Urban County municipalities include public parks, schools, and libraries, as well as offices or facilities of faith-based or non-profit housing and public service providers located in those neighborhoods.

Significant public facilities include the North Fort Myers Community Park/Recreation Center/Public Library complex, along with the J. Colin English Elementary School, and Goodwill Industries of South Florida, Inc. complex. There are also faith-based providers in the neighborhood.

Over the past five years, Lee County has invested CDBG funds in income-eligible neighborhoods throughout unincorporated Lee County or Urban municipalities and continued to support the production of infill affordable housing and home rehabilitation loans for eligible homeowners using CDBG and HOME funds. There is the potential to build on the momentum of these projects particularly in underserved neighborhoods.

# Are there other strategic opportunities in any of these areas?

Similar opportunities for investment also exist in the Urban County which can be coordinated with participating jurisdictions. These communities have partnered with Lee County Human and Veteran Services in the past and continue to partner to deliver housing and community development projects using shared CDBG funds. Strategic opportunities for financial support include public improvements, housing production, and home rehabilitation to improve neighborhood livability in eligible low- and moderate-income neighborhoods.

Census Tract (2022 ACS)	# Housing Units (Total)	# Housing Units with Multiple Housing Problems	% Housing Units with Multiple Housing Problems	% Low/Mod Income Pop. (<80% AMI)	% Low- Income Pop. (<50% AMI)	Concentration of Minority Racial or Ethnic Groups	Geographic Area
Lee County (Jurisdiction as a whole)	311,348	4,403	1.41%	42%	24%	N/A	Countywide
203.02	928	107	11.53%	76%	63%	No	Suncoast Estates
208.02	908	120	13.22%	80%	58%	Yes (43% Racial Minority, 42% Hispanic or Latino)	Palmona Park

Data Source:2018-2022 ACS; HUD FY 2023 Low- and Moderate-Income Summary Data (LMISD)Table 49 - Concentrations of Multiple Housing Problems

### **CDBG-DR Unmet Needs and Market Analysis**

The Community Development Block Grant Disaster Recovery (CDBG-DR) program provides communities impacted by disasters with resources to address a wide range of disaster-related needs. Those needs include preserving affordable housing opportunities, assisting in recovery for property owners, restoration of critical public facilities/infrastructure, mitigation through investment, continuation of public services and planning for future resiliency. Lee County completed a disaster impact and unmet needs assessment to identify the impacts, long-term needs, and priorities for more than \$1.1 billion of Community Development Block Grant-Disaster Recovery (CDBG-DR) funding allocated as a result of the 2022 Hurricane Ian event.

According to the 2023 Lee County CDBG-DR Action Plan, Amendment 4, the unmet needs analysis states that in January 2022 a tornado ripped through the county destroying 74 homes with an additional 61 sustaining major damage and 58 sustaining minor damage. One hundred more homes were impacted but were in livable condition. Just as replacement trailers were being installed at the Tropicana Mobile Home Park, Hurricane Ian made landfall in the county and these replacement housing units were destroyed. These catastrophic damages compounded an already fragile housing market in the county.

According to the 2023 Lee County CDBG-DR Action Plan, Amendment 4, the unmet needs analysis states that Hurricane Ian destroyed over 9,900 homes in Lee County and at least 13,000 units suffered serious damage. This unprecedented level of damage rendered a significant number of the county's housing uninhabitable post-storm with an additional 24,000 units having suffered lesser levels of damage. At the

same time, Ian made approximately 40 percent of the county's hotel/motel rooms uninhabitable as well.

According to the 2023 Lee County CDBG-DR Action Plan, Amendment 4, Lee County, in an effort to address unmet housing needs, will implement the following projects:

- Single Family Housing Repair, Reconstruction, and Elevation
- Multi-Family and Rental Housing Repair, Rehabilitation, and Reconstruction
- New Construction of Affordable Housing Units
- Voluntary Residential Acquisition
- Home Purchase Assistance (i.e., downpayment, closing cost, and mortgage buydown assistance)

In summary, the compounding natural disasters, COVID-19, and the unexpected growth in the county has made an already strained housing market even more unattainable and unaffordable. The Lee County intends to use CDBG-DR funds to focus on residential construction.

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

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

According to the National Broadband Availability Map (NBAM) created by the National Telecommunication and Information Administration (NTIA) of the Department of Commerce, as well as the NTIA's BroadbandUSA initiative and the Office of Internet Connectivity and Growth 2023 Annual Report, broadband internet access is critical in supporting economic opportunity especially among low- and moderate-income households. Access to broadband is essential for almost all modern services including access to work, access to education, access to healthcare, and access to public services. For example, in today's society, simply applying for a job, completing a homework assignment, or even making a doctor appointment is dependent on internet access. Therefore, all low-and moderate-income neighborhoods need access to broadband wiring and connections for residents to participate equitably in society.

Although most neighborhoods in Lee County already have broadband wiring and connections in-place, possible reasons why lower income households do not utilize broadband service are two-fold: (1) there is no working computer in the household and/or (2) internet service subscriptions are unaffordable. Because sufficient service provider coverage already exists in Lee County (see below), the main barriers to digital inclusion and thus equitable participation in society include limited access to working computers and the high cost of internet service subscriptions.

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

According to the Federal Communications Commission (FCC) Fixed Broadband Deployment Map (https://broadbandmap.fcc.gov), Lee County is already well-served by broadband providers. The broadband technology available in Lee County and the multiple jurisdictions within Lee County includes cable, fiber, fixed wireless, satellite, copper and other mediums. As defined by the FCC, broadband capability requires consumers to have access to actual download speeds of at least 25 Mbps and actual upload speeds of at least 3 Mbps (i.e., 25/3 Mbps).

Almost the entire county (95.6% of units covered within Lee County according to the Fixed Broadband Deployment Map) is served by three or more fixed residential broadband providers at speeds of at least 25/3 Mbps (downstream/upstream, December 2023). This is slightly lower than the statewide percentage of 96%. For speeds greater than 25/3 Mbps (e.g., 100/10 or 250/25), service is significantly

less available, with an average of 6.4% of units covered by 3 or more providers served by those higher speeds. As a result, there is very limited competition between broadband service providers offering higher downstream/upstream speeds. However, for typical speeds of up to 25/3 Mbps, there is sufficient competition between broadband service providers in Lee County.

Due to their urban location, Lee County's low- and moderate-income neighborhoods in eligible block groups appear to be served by three or more providers at speeds of up to 25/3 Mbps. The broadband service providers in Lee County include Comcast Corporation (Xfinity), ALTIUS Communications, LLC (BridgeMAXX, Suncoast Broadband), ViaSat, Inc., Space Exploration Technologies (Starlink), Lumen Technologies (CenturyLink), T-Mobile USA, Starlink, Xfinity, Verizon Communications, Hotwire Communications, DSI Management Holdings, and Hughes Network Systems, LLC. [Source: Broadband availability in Federal Communications Commission (FCC) Fixed Broadband Deployment Map]

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

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

The Southwest Florida region with its coastal development and tourism industries, has significant exposure to natural disasters and environmental risks due to its geographic location directly on the Gulf of Mexico. These risks include flooding of public infrastructure and private property, including impacts to drinking water and wastewater systems. In 2016, the South Florida Regional Council published a report titled, "Assessment Report of Regional Differences within Florida." According to the report, climate related issues present in Southwest Florida included Coastal Erosion, Sea Level Rise, Water Supply and quality, coastal growth, and flooding among others.

With coastline on the Gulf of Mexico and Intracoastal Waterway, there is the potential for both sea-level rise and storm surge events in Lee County. There are significant inundation risks along the Caloosahatchee River, Telegraph Creek, Cypress Creek, Spanish Creek, San Carlos Bay, Pine Island Sound, Matlacha Pass, Estero Bay, Rocky Bay, Ostego Bay, Imperial River, Spring Creek Bayou, Hendry Creek and the numerous canals and channels of Cape Coral. Many residents of Lee County are likely to experience these coastal risks first-hand. The Florida Climate Center indicates the intermediate high sea level is projected to increase by 1.3 feet by 2050 and 3.4 feet by 2080 (approximate averages of St. Petersburg and Naples, Florida). The 2016 report indicated significant inundation is possible along the entirety of the Southwest Florida coast but especially in the lower elevations of Charlotte, Lee and Collier Counties.

In 2010, the Southwest Florida Regional Planning Council (SWFRPC) published a report titled, "Lee County Climate Change Vulnerability Assessment." According to the report, Lee County (along with the rest of the State of Florida) will continue to see sea level rise affect the county. Those affects include, but are not limited, to shoreline erosion, barrier island erosion, loss of mangroves, marsh and creek ecosystems, and higher risk to storm surge/flooding during extreme weather events. This report noted that due to increased human development, natural areas in Lee County are being replaced, leading to the destruction of the Floridian ecosystems, one of the most diverse ecosystems in North America. Likewise, this coastal development and loss of barrier habitats can lead to a much more devastating impact of flooding and storm surge events.

In both reports, prioritized vulnerabilities include critical public infrastructure, stormwater, potable water, wastewater, public lands, and critical buildings located coastally or within low-lying areas. Adaptation strategies include relocating or hardening infrastructure against inundation risks.

Lee County's mitigation planning efforts are centered on the Joint Unified Local Mitigation Strategy (LMS). The LMS is a comprehensive plan that is reviewed and approved every five (5) years by the Florida Division of Emergency Management (FDEM) and the Federal Emergency Management Agency (FEMA). The LMS includes a hazard and vulnerability assessment, mitigation goals and objectives for the community, and demographic information.

The LMS can be reviewed here:

# https://www.leegov.com/publicsafety/Documents/Emergency%20Management/Joint%20Local%20Mitigation%20Strategy%20-%202022.03.pdf

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

Comparing the locations of low- and moderate-income block groups within Lee County to potential inundation from 3-foot (i.e., 100-year) sea level rise as mapped by NOAA's Office for Coastal Management (http://coast.noaa.gov/slr), the most vulnerable households live coastally along Lee County's many bays or tributaries.

There are 19 block groups that are both at-risk of inundation and qualify as low- and moderate income. These block groups include [Block Group (BG) and Census Tract (CT)]: BG1 CT302.04, BG2 CT4.01, BG1 CT4.01, BG4 CT3.01, BG2 CT3.01, BG2 CT3.02, BG2 CT5.03, BG1 CT3.02, BG1 CT5.03, BG1 CT803, BG1 CT205.02, BG5 CT206, BG2 CT506.02, BG1 CT505, BG2 CT601.02, BG1 CT19.10, BG1 CT702, BG2 CT701.02, and BG1 CT701.01. Fortunately, the majority of Lee County's low- and moderate-income block groups are located inland and may be unaffected by sea level rise.

According to the SWFRPC, persons living in poverty may not have adequate resources to prepare for or respond to hazards. As land becomes increasingly inundated and unusable, substandard housing, increasing housing costs (including property taxes, insurance, and repair/maintenance costs), lack of transportation and/or financial means to evacuate in a disaster, and other factors will make living in coastal areas increasingly unaffordable to many as well as possibly putting some households at-risk of homelessness if they cannot afford to relocate.

# Strategic Plan

# SP-05 Overview

## **Strategic Plan Overview**

The Consolidated Plan process requires Lee County to identify priority needs and to develop a Strategic Plan, which includes specific goals be met over the five-year planning period.

The Lee County Strategic Plan consists of the following subsections:

- Overview
- Geographic Priorities
- Priority Needs
- Influence of Market Conditions
- Anticipated Resources
- Institutional Delivery Structure
- Goals Summary
- Homelessness Strategy
- Lead-Based Paint Hazards
- Anti-Poverty Strategy
- Monitoring

Through the Citizen Participation process, Lee County identified 11 priority needs for the five-year planning period. The County's priority needs include the following: New Construction and Rehabilitation for Affordable Housing; Rental and Down Payment Assistance; Housing Counseling/Legal Aid; Homeless/Special Needs Housing and Shelter; Public Services; Public Facility Improvements; Public Infrastructure Improvements; Code Enforcement/Blight Elimination; Public Safety/Crime Prevention; Job Skills/Education; and Emergency/Urgent Needs.

Lee County's Strategic Plan is structured around six (6) goals in administering the County's housing and community development programs funded with CDBG, HOME, ESG, and related programs, including CDBG-DR and ESG-RUSH. These goals are as follows:

- 1. <u>Affordable Housing Construction, Rehabilitation, and Assistance</u> Increase the supply, quality, and availability of affordable housing in Lee County.
- 2. <u>Public Services and Homeless/Special Needs Services</u> Address unmet needs for public services that benefit low- and moderate-income, homeless, and special needs persons and households.
- Shelter, Public Facility, and Infrastructure Improvements Improve the living environment of low- and moderate-income, homeless, and special needs persons by providing adequate shelter, public facilities, and infrastructure.
- 4. <u>Emergency/Urgent Needs and Disaster Recovery</u> Provide aid before, during, and after an emergency and/or disaster event as dictated by available funding and project eligibility.

- 5. <u>Urban County Needs</u> Fund projects in Urban County communities, including Sanibel, Bonita Springs, Fort Myers Beach, and Estero, as dictated by available funding and project eligibility.
- 6. <u>Non-Goal Program Administration</u> Administer the County's federally funded grant programs.

These goals will be met through a variety of projects, which will be identified in Lee County's Annual Action Plans, beginning with the first program year (FY 2024) Annual Action Plan.

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

# Geographic Area

	e 50 - Geographic Phoney Aleas	
1	Area Name:	Low- and Moderate-Income Areas (LMA)
	Area Type:	Local Target area
	Other Target Area Description:	N/A
	HUD Approval Date:	N/A
	% of Low/ Mod:	51% or more
	Revital Type:	Comprehensive
	Other Revital Description:	N/A
	Identify the neighborhood boundaries for this target area.	Block Groups that are eligible for federal funding based on the percentage of low- and moderate- income population therein (i.e., LMA) as qualified by HUD's Low- and Moderate-Income Summary Data (LMISD). LMA neighborhoods include, but are not limited to, Alabama Grove Terrace, Broadview Manor, East Meadows, Fort Myers Shores, Golden Lake Heights, Harlem Heights, Lehigh Acres, Lehigh Estates, Maravilla Circle, Page Park, Palmona Park, Pine Manor, Royal Palm Park, Suncoast Estates, Tice Heights, and Twin Lake Estates, among others as qualified by the LMISD. It is important to note that the neighborhoods eligible for federal funding change from time to time with each publication of the LMISD, which is updated annually by HUD.
	Include specific housing and commercial characteristics of this target area.	See sections MA-50 and SP-30 for the housing and commercial characteristics of the low- and moderate-income areas.
	How did your consultation and citizen participation process help you to identify this neighborhood as a target area?	See "The Process".
	Identify the needs in this target area.	See section SP-25 for a list of the priority needs in the low- and moderate-income areas.

What are the opportunities for improvement in this target area?	See sections MA-50 and SP-30 for the opportunities for improvements in the low- and moderate-income areas.
Are there barriers to improvement in this target area?	See sections MA-40 and SP-55 for the barriers to improvement in the low- and moderate-income areas.

## **General Allocation Priorities**

Describe the basis for allocating investments geographically within the jurisdiction.

**Map 1 (see NA-05)** shows the location of low- and moderate-income areas (LMA) in Lee County where residents may be eligible for federally funded activities under the CDBG program. This data is sourced from HUD's FY 2024 Low- and Moderate-Income Summary Data (LMISD) based on the 2016-2020 ACS, where the LMA eligibility threshold for the County's programs is 51% of the Block Group's population.

Capital improvements, such as public facility and infrastructure projects, will only be funded when serving an eligible LMA neighborhood, as qualified by LMISD and consistent with the requirements of the CDBG program. However, the County will continue to fund activities that benefit low- and moderate-income individuals (LMI) residing anywhere in unincorporated Lee County or Urban County municipalities through housing rehabilitation and assistance, public services, and similar client-based projects.

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

### Priority Needs

1	Priority Need Name	New Construction and Rehabilitation for Affordable Housing						
	Priority Level	High						
	Population	Income Level: Extremely Low, Low, Moderate						
	Geographic Areas Affected	N/A						
	Associated Goals	Affordable Housing Construction, Rehabilitation, and Assistance						
	Description	The production of affordable housing to increase supply, which is needed for all income levels and in all areas of Lee County/Urban County.						
	Basis for Relative Priority	The priority needs were identified and prioritized through the citizen participation process.						
2	Priority Need Name	Rental and Down Payment Assistance						
	Priority Level	High						
	Population	Income Level: Extremely Low, Low, Moderate						
	Geographic Areas Affected	N/A						
	Associated Goals	Affordable Housing, Construction, Rehabilitation, and Assistance; Public Services and Homeless/Special Needs Services						
	Description	Financial assistance to attain affordable housing, including but not limited to TBRA, down payment assistance, or purchase price assistance.						
	Basis for Relative Priority	The priority needs were identified and prioritized through the citizen participation process.						
3	Priority Need Name	Housing Counseling/Legal Aid						
	Priority Level	High						

	Population	Income Level: Extremely Low, Low, Moderate							
	Geographic Areas Affected	N/A							
	Associated Goals	Affordable Housing, Construction, Rehabilitation, and Assistance Housing related services, including housing counseling and legal aid to remain stably housed.							
	Description								
	Basis for Relative Priority	The priority needs were identified and prioritized through the citizen participation process.							
4	Priority Need Name	Homeless/Special Needs Housing and Shelter							
	Priority Level	High							
	Population	Homeless: Chronic Homeless, Individuals, Families with Children, Mentally III, Chronic Substance Abuse, Veterans, Persons with HIV/AIDS, Victims of Domestic Violence, Unaccompanied Youth; Non-Homeless Special Needs: Elderly, Frail Elderly, Persons with Mental Disabilities, Persons with Physical Disabilities, Persons with Developmental Disabilities, Persons with Alcohol or Other Addictions, Persons with HIV/AIDS and their Families, Victims of Domestic Violence							
	Geographic Areas Affected	N/A							
	Associated Goals	Shelter, Public Facility, and Infrastructure Improvements							
	Description	Projects resulting in shelter or housing specifically targeted to homeless or special needs persons or households, including but not limited to emergency shelter, transitional housing, or permanent supportive housing.							
	Basis for Relative Priority	The priority needs were identified and prioritized through the citizen participation process.							
5	Priority Need Name	Public Services							
	Priority Level	High							

	Population	Income Level: Extremely Low, Low, Moderate; Homeless: Chronic Homeless, Individuals, Families with Children, Mentally III, Chronic Substance Abuse, Veterans, Persons with HIV/AIDS, Victims of Domestic Violence, Unaccompanied Youth; Non-Homeless Special Needs: Elderly, Frail Elderly, Persons with Mental Disabilities, Persons with Physical Disabilities, Persons with Developmental Disabilities, Persons with Alcohol or Other Addictions, Persons with HIV/AIDS and their Families, Victims of Domestic Violence
	Geographic Areas Affected	N/A
	Associated Goals	Public Services and Homeless/Special Needs Services; Urban County Needs
	Description	Public services benefitting low- and moderate-income, homeless, or special needs persons or households, including but not limited to healthcare/mental health/substance abuse services, childcare, youth/senior centers and services, food/nutritional assistance, self-sufficiency/financial literacy resources, transportation services, resource/resiliency coordination, homeless services, and special needs services.
	Basis for Relative Priority	The priority needs were identified and prioritized through the citizen participation process.
6	Priority Need Name	Public Facility Improvements
	Priority Level	High
	Population	Income Level: Extremely Low, Low, Moderate; Non-Housing Community Development
	Geographic Areas Affected	LMA
	Associated Goals	Shelter, Public Facility, and Infrastructure Improvements; Urban County Needs
	Description	Necessary improvements and expansions to facilities owned by Lee County or non-profit organizations that serve low- and moderate-income, homeless, or special needs populations.
	Basis for Relative Priority	The priority needs were identified and prioritized through the citizen participation process.

7	Priority Need	Public Infrastructure Improvements
	Name	
	Priority Level	Low
	Population	Income Level: Extremely Low, Low, Moderate; Non-Housing Community Development
	Geographic Areas Affected	LMA
	Associated Goals	Shelter, Public Facility, and Infrastructure Improvements; Urban County Needs
	Description	Necessary improvements and expansions to infrastructure owned by Lee County that serves low- and moderate-income, homeless, or special needs populations.
	Basis for Relative Priority	The priority needs were identified and prioritized through the citizen participation process.
8	Priority Need Name	Code Enforcement/Blight Elimination
	<b>Priority Level</b>	Low
	Population	Non-Housing Community Development
	Geographic Areas Affected	LMA
	Associated Goals	Shelter, Public Facility, and Infrastructure Improvements
	Description	Code enforcement and blight elimination projects in low- and moderate-income areas.
	Basis for Relative Priority	The priority needs were identified and prioritized through the citizen participation process.
9	Priority Need Name	Public Safety/Crime Prevention
	Priority Level	Low
	Population	Non-Housing Community Development

	Geographic Areas Affected	LMA								
	Associated Goals	Public Services & Homeless/Special Needs Services; Shelter, Public Facility, & Infrastructure Improvements								
	Description	Public safety/crime prevention projects in low- and moderate-income areas.								
	Basis for Relative Priority	The priority needs were identified and prioritized through the citizen participation process.								
10	Priority Need Name	Job Skills/Education								
	Priority Level	Low								
	Population	Income Level: Extremely Low, Low, Moderate								
	Geographic Areas Affected	N/A								
	Associated Goals	Public Services & Homeless/Special Needs Services								
	Description	Job/employment skills training and education toward self-sufficiency.								
	Basis for Relative Priority	The priority needs were identified and prioritized through the citizen participation process.								
11	Priority Need Name	Emergency/Urgent Needs								
	Priority Level	High								
	Population	Income Level: Extremely Low, Low, Moderate; Non-Housing Community Development								
	Geographic Areas Affected	N/A								
	Associated Goals	Emergency/Urgent Needs and Disaster Recovery								
	Description	Activities to prepare for and respond to emergencies and disasters.								

Basis for Relative Priority The priority needs were identified and prioritized through the citizen participation process.

#### Narrative (Optional)

The Consolidated Plan must indicate the general priorities for allocating investment of available resources among different needs. Priority needs are those that will be addressed by the goals outlined in the Strategic Plan.

Through the Citizen Participation process, Lee County identified 11 priority needs for the five-year planning period. The County's priority needs include the following: New Construction and Rehabilitation for Affordable Housing; Rental and Down Payment Assistance; Housing Counseling/Legal Aid; Homeless/Special Needs Housing and Shelter; Public Services; Public Facility Improvements; Public Infrastructure Improvements; Code Enforcement/Blight Elimination; Public Safety/Crime Prevention; Job Skills/Education; and Emergency/Urgent Needs. For each priority, Lee County has indicated one or more populations to be served, as well as an assigned priority level indicating relative importance among the needs listed.

The priority needs were identified and prioritized through the citizen participation process, which included a Focus Group consultation meeting with non-profit housing and social service providers and neighborhood organizations, an online needs assessment survey, and public hearings with the Community Action Agency (CAA) and Board of County Commissioners. Opportunities to participate were advertised by newspaper notice, social media, and email outreach. Comments and concerns raised during the citizen participation process were taken into consideration when developing the priority needs and goals of the Strategic Plan component of the Consolidated Plan.

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

#### Influence of Market Conditions

Affordable	Market Characteristics that will influence
Housing Type	the use of funds available for housing type
Tenant Based	The use of HOME funds for Tenant Based Rental Assistance (TBRA) is planned to
Rental Assistance	continue throughout the duration of this plan. The CoC Strategic Plan and
(TBRA)	Homeless Management Information System (HMIS) data indicates that there is a
	substantial need for permanent supportive housing for individuals who are
	experiencing homelessness. TBRA, as designed locally, is intended to serve
	persons with acute housing and services needs through rental subsidy and
	intensive case management.
TBRA for Non-	TBRA specifically for non-homeless special needs is not planned. However, non-
Homeless Special	homeless special needs populations may qualify for TBRA based on income level.
Needs	
New Unit	Current market condition supports the need for the production of new affordable
Production	housing units. Those units will be developed through CDBG/HOME Non-Profit
	Housing and HOME Community Housing Development Organization (CHDO)
	activities.
Rehabilitation	Current market conditions support the needs for rehabilitation. As many of Lee
	County's housing unit approach 20 years of age, the need for rehabilitation is
	expected to grow throughout the duration of this plan. CDBG Owner Occupied
	Rehabilitation/Reconstruction activities will address this need. The damage and
	recovery from Hurricane Ian make rehabilitation a more viable and necessary
	option.
Acquisition,	Acquisition of housing may take place in coordination with CDBG/HOME Non-
including	Profit Housing and HOME Community Housing Development Organization
preservation	(CHDO) activities. Such activities may include acquisition and/or rehabilitation of
	property and existing units to increase and/or preserve Lee County's affordable
	housing stock.
Table F2 Juffuseres	

Table 52 – Influence of Market Conditions

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

#### Introduction

The Strategic Plan must identify the federal, state, local and private resources expected to be available to Lee County to address the priority needs and goals identified in the Consolidated Plan. These resources are summarized in SP-35.

Lee County anticipates a total allocation of \$3,127,061 in CDBG funding for the 2024 program year. Program income for CDBG is expected to be approximately \$30,150, and \$1,306,308 in prior-year resources are anticipated. The total anticipated available resources is \$4,463,519 for the 2024 program year. CDBG funds will be used for housing and community development activities including, but not limited to, down payment assistance, housing rehabilitation, public services, public or non-profit improvements, Urban County projects, and administration of the County's CDBG program.

Lee County anticipates a total allocation of \$935,108.38 in HOME funding for the 2024 program year. No program income and no prior-year resources are anticipated for HOME. HOME funds will be used for housing-related activities including, but not limited to, down payment assistance, affordable housing acquisition, rehabilitation, or new construction, Tenant-Based Rental Assistance (TBRA), and administration of the County's HOME program.

Lee County also anticipates a total allocation of \$271,149 in ESG funding for the 2024 program year. No program income and no prior-year resources are anticipated for ESG. ESG funds will be used for homeless street outreach activities, rapid rehousing, and administration of the County's ESG program.

Two additional funding sources, CDBG-DR and ESG-RUSH are also anticipated. The total allocation of CDBG-DR is \$1,107,881,000, and the total allocation of ESG-RUSH is \$1,849,306. Details regarding the CDBG-DR allocation are more fully provided in a separate planning document titled, "Lee County 2023 CDBG-DR Action Plan, Amendment 4", which is posted on the County's website.

The expected amount available during the remainder of the Consolidated Plan (2025-2028) is based on an estimated annual allocation of \$3,166,000 in CDBG funds, \$935,108 in HOME funds, and \$270,000 in ESG funds, excluding program income and prior-year resources as those amounts are unknown currently. This results in an estimated funding amount of \$12,702,939 in CDBG, \$3,740,432 in HOME, and \$1,078,851 in ESG over the remaining four-year period.

Other resources, such as private and non-Federal public sources may become available to Lee County during the program year. For CDBG leveraging, these include local government General Fund dollars, private or nonprofit organizations, or other sources. The County will look to leverage funds, if available, from other agencies and programs to support housing and community development efforts.

The Annual Action Plan must summarize Lee County's priority needs and goals to address during the first year of the Strategic Plan. These goals must be described in quantitative terms. Lee County has selected goal outcome indicators and quantities based on the anticipated performance measures of the 2024 Annual Action Plan. See AP-20.

**Tables 53**, **56**, **58**, and **59** show the anticipated resources available in Year 1 (2024) and Years 2-5 (2025-2028) (i.e., remainder) of the five-year planning period.

*HUD FY 2024 Formula Allocation; Notes: Program incomes and prior-year resources are estimated amounts and actual amounts may differ if larger sums are received from loan payoffs or cancelled or underbudget projects. These amounts will be updated during the 2024 program year close-out.

#### **Anticipated Resources**

Program	Source	Uses of Funds	Expe	ected Amou	int Available Ye	ear 1	Expected	Narrative Description
	of Funds		Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$	Amount Available Remainder of ConPlan	
							\$	
CDBG	public - federal	Acquisition Admin and Planning Economic Development Housing Public Improvements Public	\$3,127,061	\$30,150	\$1,306,308	\$4,463,519	\$12,702,939	CDBG funds will be used in accordance with 24 CFR 570 and this Consolidated Plan to further address community development, housing, and homeless needs in Lee County.
		•						

Program	Source	Uses of Funds	Expected Amount Available Year 1			Expected	Narrative Description	
	of Funds		Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$	Amount Available Remainder of ConPlan \$	
HOME	public - federal	Acquisition Homebuyer assistance Homeowner rehab Multifamily rental new construction Multifamily rental rehab New construction for ownership TBRA	\$935,108.38	\$0	\$0	\$935,108.38	\$3,740,432	HOME funds will be used in accordance with 24 CFR 92 and this Consolidated Plan to address housing needs in Lee County.

Program	Source	Uses of Funds	Exp	ected Amou	nt Available Y	ear 1	Expected Amount Available Remainder of ConPlan \$	Narrative Description
	of Funds		Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
ESG	public - federal	Conversion and rehab for transitional housing Financial Assistance Overnight shelter Rapid re- housing (rental assistance) Rental Assistance Services Transitional housing	\$271,149	\$0	\$0	\$271,149	\$1,078,851	ESG funds will be used in accordance with 24 CFR 576 and this Consolidated Plan to provide housing and services to persons experiencing homelessness in Lee County.
Other – CDBG- DR	public - federal	Other (CDBG- DR)	\$324,071,992	\$0	\$0	\$324,071,992	\$783,809,008	CDBG-DR (Disaster Relief) funds will be used consistent with the Lee County CDBG- DR Action Plan, which is a separate planning document.

Program	Source	Uses of Funds	Expected Amount Available Year 1			ear 1	Expected	Narrative Description
	of Funds		Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$	Amount Available Remainder of ConPlan \$	
Other – ESG- RUSH	public - federal	Other (ESG- RUSH)	\$1,849,306	\$0	\$0	\$1,849,306	\$0	ESG-RUSH funds will be used to address the unmet needs of individuals and families who are homeless or at risk- of homelessness and affected by disaster.

Table 53 - Anticipated Resources

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

Federal funds will leverage other funds by referring identified at-risk households or homeless households to appropriate programs for prevention or re-housing. Services provided are funded with Lee County General funds, Continuum of Care programs, HOPWA and CSBG. Additionally, State SHIP funds are used to assist low-income persons with down payment assistance and provide match for HOME funded projects. ESG will be matched with County General funds, as well as other resources documented by sub-recipients. Some CDBG funds will be concentrated on public facility or infrastructure improvements and will be used in the targeted areas noted in this Consolidated Plan. These funds will be leveraged with private funds gathered by neighborhood organizations through fundraising.

CDBG funds do not require a local match; however, where applicable, Lee County will leverage CDBG funds with other public and private funding sources. When feasible, CDBG funds will be leveraged with other funds gathered by nonprofit and neighborhood organizations through fundraising. State SHIP funds are used to assist low-income persons with down payment assistance and provide a match for HOME funded projects. The Emergency Shelter Grant (ESG) requires a 1:1 match. The match is met through the County's General Fund contribution, as well as other resources documented by subrecipients. Each agency receiving funding is required to offer some amount of match, if required by the grant program.

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

There are no publicly owned lands or properties that are currently identified for projects in this plan.

#### Discussion

Lee County's anticipated funding allocation from CDBG, HOME, and ESG will address many of the County's goals, including Affordable Housing Construction, Rehabilitation, and Assistance; Public Services and Homeless/Special Needs Services; Shelter, Public Facility, and Infrastructure Improvements; Emergency/Urgent Needs and Disaster Recovery; Urban County Needs; and Program Administration. The County is fortunate to have a network of public service providers to help address these goals through financial leveraging, including other potential Federal funding sources such as SHIP and non-Federal sources. Lee County also partners with Urban County municipalities, County departments, and other agencies to achieve goals.

## SP-40 Institutional Delivery Structure – 91.215(k)

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

Responsible Entity	Responsible Entity Type	Role	Geographic Area Served
Lee County Human and	Government agency;	Affordable housing –	Jurisdiction
Veteran Services	Continuum of Care	ownership; Affordable	
		housing – rental;	
		Homelessness; Non-	
		homeless special	
		needs; Community	
		development: public	
		facilities,	
		neighborhood	
		improvements, public	
		services, economic	
		development;	
		Planning	
City of Sanibel	Government agency	Community	Jurisdiction
		development: public	
		facilities,	
		neighborhood	
		improvements, public	
		services, economic	
		development	
City of Bonita Springs	Government agency	Community	Jurisdiction
		development: public	
		facilities,	
		neighborhood	
		improvements, public	
		services, economic	
		development	
Town of Fort Myers	Government agency	Community	Jurisdiction
Beach		development: public	
		facilities,	
		neighborhood	
		improvements, public	
		services, economic	
		development	

Responsible Entity	Responsible Entity	Role	Geographic Area
	Туре		Served
Village of Estero	Government agency	Community	Jurisdiction
		development: public	
		facilities,	
		neighborhood	
		improvements, public	
		services, economic	
		development	
Lee County Homeless	Nonprofit organization	Homelessness;	Other (Continuum of
Coalition		Planning	Care)
Lee County Housing	РНА	Public housing;	Jurisdiction
Authority		Planning	
Housing Authority of	РНА	Public housing;	Jurisdiction
the City of Fort Myers		Planning	

Table 54 - Institutional Delivery Structure

#### Assess of Strengths and Gaps in the Institutional Delivery System

The project and activities listed in this Consolidated Plan will primarily be completed by Lee County. Urban County activities will be completed by each local government partner. Activities related to Public Housing will be completed by the Housing Authority of the City of Fort Myers and/or the Lee County Housing Authority.

Sub recipient and developer contracts will be used during the five-year period, but sub recipients are yet unknown. All sub recipients will be selected through the completion of one of the six models for assessing applications and selection sub recipients, as required by local procurement, HVS policy, and as suitable for the project/activity type. The six models for assessing applicants and selection sub recipients can be viewed in detail in Chapter 2 of the "Managing CDBG: A guidebook for CDBG Grantees on Sub recipient Oversight" handbook and are listed below.

- Model 1: Formal Applications or Request for Applications (RFA)
- Model 2: Simplified or Limited Application with Grantee Follow-up
- Model 3: Direct Solicitation of Qualified Organizations
- Model 4: Accepting Unsolicited Applications
- Model 5: Review existing sub recipients' performance and continue to fund existing programs when warranted
- Model 6: Mixed approach that uses strengths of other models

Agency partners work well with the County and with each other, and there are not any identified gaps to the delivery system.

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

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

Table 55 - Homeless Prevention Services Summary

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

Housing and services for persons experiencing homelessness are provided through the Lee County Continuum of Care (CoC). The Continuum of Care is a broad group of individual stakeholders and organizations who are engaged to ensure that homelessness is rare, brief, and onetime. Collaboration among CoC members occurs through regular meetings of the Lee County Homeless Coalition and various subcommittees. The CoC Governing Board has been established to act on behalf of the CoC membership to oversee the responsibilities of the CoC, the operation of the Homeless Management Information System (HMIS), the implementation of the Coordinated Entry System, and to complete long-term strategic planning. The Lee County CoC is also responsible for advancing community-wide efforts, including the annual Point-in-Time (PIT) count conducted by the CoC, which involves various partnering organizations. These organizations offer services to the homeless population, including prevention services, street outreach, and supportive services.

The homeless housing and service providers within the CoC are required to coordinate with mainstream services. A primary function of case management is to make and coordinate referrals with community resources and mainstream services such as Food Stamps, Medicaid, Childcare, SSI/SSDI, Veteran's Services, Section 8 Housing, mental health services, abuse services, etc. Staff from all funded agencies are required to make referrals and ensure clients accesses the referred services. Staff must also make necessary accommodations to ensure that clients needing additional assistance to utilize those services have the necessary resources. Client files from funded agencies are monitored to ensure that referrals and accommodations are appropriate, consistent, and timely.

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

As previously noted, agency partners in Lee County work well together to meet the needs of residents and create a strong service delivery system. Special needs populations and the homeless are provided numerous services and have access to many programs, which are listed elsewhere in this consolidated plan. A weakness to the continuum of services may be the engagement of new service or housing providers in the area, but CoC Strategic Plan outlines Action Steps that the CoC intends to take to remedy this weakness.

The dynamic of post disaster services is not new to the county but will take heightened priority as the County continues to recover and address the impacts to services and development from Hurricane Ian.

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

Priority needs in the plan are addressed by the entities listed in the table above. Services and programs that help to meet these and other needs are also provided by many local agencies. Gaps in providing programs or services that meet the priority needs will be evaluated on an annual basis, but at the onset of this planning cycle, there are no identified gaps to implementation.

## SP-45 Goals Summary – 91.215(a)(4)

### **Goals Summary Information**

Sort Order	Goal Name	Start	End	Category	Geographic	Needs Addressed	Funding	Goal Outcome Indicator
1	Affordable	<b>Year</b> 2024	<b>Year</b> 2028	Affordable	Area N/A	New Construction	CDBG: \$3,663,633	Rental Units
-	Housing	2024	2020	Housing;	N/A	and Rehabilitation	CDDG. \$5,005,055	Constructed: 5
	-							
	Construction,			Public Housing		for Affordable		Household/Housing
	Rehabilitation, and					Housing; Rental	HOME: \$4,207,990	Units; Homeowner
	Assistance					and Down Payment		Housing Added: 10
						Assistance;		Household/Housing
						Housing		Units; Homeowner
						Counseling/Legal		Housing Rehabilitation:
						Aid		147
								Households/Housing
								Units; Direct Financial
								Assistance to
								Homebuyers: 48
								Households Assisted;
								Tenant-Based Rental
								Assistance/Rapid
								Rehousing: 35
								Households Assisted

Sort	Goal Name	Start	End	Category	Geographic	Needs Addressed	Funding	Goal Outcome Indicator
Order		Year	Year		Area			
2	Public Services	2024	2028	Non-Housing	N/A	Public Services;	CDBG: \$2,393,402;	Public Services
	and			Community		Rental and Down		activities other than
	Homeless/Special			Development;		Payment	ESG: \$1,248,750;	Low/Moderate Income
	Needs Services			Homeless;		Assistance; Public		Housing Benefit:
				Non-Homeless		Safety/Crime	ESG-RUSH:	55,145 Persons
				Special Needs		Prevention; Job	\$1,849,306	Assisted; Homeless
						Skills/Education		Person Overnight
								Shelter: 32,500
								Persons Assisted
								(Street Outreach);
								Tenant-Based Rental
								Assistance/Rapid
								Rehousing: 45
								Households Assisted
3	Shelter, Public	2024	2028	Non-Housing	LMA	Homeless/Special	CDBG: \$4,906,995	Other: 5 Other
	Facility, and			Community		Needs Housing and		[Facilities]
	Infrastructure			Development;		Shelter; Public		
	Improvements			Homeless;		Facility		
				Non-Homeless		Improvements;		
				Special Needs		Public		
						Infrastructure		
						Improvements;		
						Code		
						Enforcement/Blight		
						Elimination; Public		
						Safety/Crime		
						Prevention		
						Prevention		

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
4	Emergency/Urgent		2028	Affordable	N/A	Emergency/Urgent	CDBG-DR:	Other: 0 Other
	Needs and	-		Housing; Non-	,	Needs	\$1,107,881,000	
l	Disaster Recovery			Housing				
l				Community				
				Development				
5	Urban County	2024	2028	Non-Housing	N/A	Public Services;	CDBG: \$3,069,618	Other: 5 Other
	Needs			Community		Public Facility		[Projects]
				Development		Improvements;		
1						Public		
						Infrastructure		
						Improvements		
6	Non-Goal Program	2024	2028	Other:	N/A	N/A	CDBG: \$3,132,810;	Other: O Other
	Administration			Administration				
							HOME: \$467,550;	
1								
							ESG: \$101,250	
l								
l								

Table 56 – Goals Summary

### **Goal Descriptions**

1	Goal Name	Affordable Housing Construction, Rehabilitation, and Assistance
	Goal Description	Increase the supply, quality, and availability of affordable housing in Lee County.
2	Goal Name	Public Services and Homeless/Special Needs Services
	Goal Description	Address unmet needs for public services that benefit low- and moderate-income, homeless, and special needs persons and households.
		*GOI includes homeless street outreach activities under Homeless Person Overnight Shelter consistent with HUD guidance.
3	Goal Name	Shelter, Public Facility, and Infrastructure Improvements
	Goal Description	Improve the living environment of low- and moderate-income, homeless, and special needs persons by providing adequate shelter, public facilities, and infrastructure. * GOI "Other" = Facilities
4	Goal Name	Emergency/Urgent Needs and Disaster Recovery
	Goal Description	Provide aid before, during, and after an emergency and/or disaster event as dictated by available funding and project eligibility.
5	Goal Name	Urban County Needs
	Goal Description	Fund projects in Urban County communities, including Sanibel, Bonita Springs, Fort Myers Beach, and Estero, as dictated by available funding and project eligibility. *GOI "Other" = Projects
6	Goal Name	Non-Goal Program Administration
	Goal Description	Administer the County's federally funded grant programs.

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

Over the next five years, Lee County plans to assist 48 households with direct financial assistance (i.e., downpayment assistance) and 35 households with TBRA/rapid re-housing, using CDBG and HOME funding to address the County's Affordable Housing Construction, Rehabilitation, and Assistance goal. Lee County plans to assist another 45 households with TBRA/rapid re-housing, using CDBG, ESG, and ESG-RUSH funding to address the Public Services and Homeless/Special Needs Services goal. Additionally, Lee County plans to assist 147 homeowners with housing rehabilitation and plans to construct 5 new rental units and 10 new homeowner units using CDBG and HOME funding, as applicable, over the next five years.

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

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

All publicly assisted residents (public housing or voucher) need affordable, accessible units. Approximately 15% of the applicants on the waiting list are in need of accessible Section 504 units. Most needs identified were for physical disabilities.

As of May 2024, there were 2,398 households on the Housing Choice Voucher waiting list. Those applicants consisted of families, elderly, and persons with disabilities, as well as other special populations. The waiting list for Public Housing had 2,768 applicants, and the waiting list for project-based housing was 3,224 applications. Those on the waiting list, residents of public housing, and Housing Choice vouchers have immediate need for education, employment skills, transportation, financial literacy, and low-cost childcare.

#### **Activities to Increase Resident Involvements**

Public Housing residents have the benefit of voluntary participation in the Lee County Housing Authority (LCHA) and the Housing Authority of the City of Fort Myers (HACFM) Family Self Sufficiency (FSS) program, which provides one-on-one counseling and guidance in the areas of employment, secondary education, credit counseling, and homeownership counseling.

The LCHA is striving to convert all of its Public Housing units over to Project Based Vouchers, the residents will qualify for choice mobility. This means that after 24 months, they have the option to request a regular Housing Choice Voucher when available. LCHA still has a goal of providing the option of the Homeownership Voucher Program (HVP). The Housing Authority of the City of Fort Myers has active tenant associations at three of the public housing properties to encourage resident participation and involvement.

Residents are always encouraged to attend monthly resident meetings, which are held at all developments to encourage resident involvement.

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

No

#### Plan to remove the 'troubled' designation

Neither PHA is currently listed as troubled.

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

#### **Barriers to Affordable Housing**

This section requires the jurisdiction to explain whether the cost of housing or the incentives to develop, maintain, or improve affordable housing are affected by public policies, particularly those of the local jurisdiction. Such policies include land use controls, zoning ordinances, building codes, and policies that affect the return on residential investment.

The current Analysis of Impediments to Fair Housing Choice for Lee County (2019-2023), which is in the process of being updated as the Housing Equity Plan, identifies a number of local barriers. Many of these were noted in the previous Consolidated Plan update, which identified barriers based on race, national origin, and/or disability; loan application denial rates (lower for White applicants than for other races/ethnicities); opposition to public housing development; insufficient accessible housing units; insufficient transportation systems; and inequitable geographic distribution of public housing units. Plan goals and projects will attempt to address these barriers. An example of such a project may include housing rehabilitation, where the scope of work may address the accessibility of a unit.

Regional barriers to affordable housing as identified in the 2019-2023 Analysis of Impediments to Fair Housing Choice, which is in the process of being updated as the Housing Equity Plan, include but are not limited to:

- Housing discrimination persists in the private market
- Pattern of disparity continues to exist in private mortgage lending for racial and ethnic minorities
- Limited public transit options and rising cost of transportation
- Insufficient number of accessible housing units that meet the need of disabled citizens
- Fair Housing education, training and outreach programs are inadequate
- Neighborhood opposition to diversity in housing type

In general, Lee County will continue to work with non-profit housing developers and providers to increase the amount of affordable housing and address the regional impacts and barriers to affordable housing in the county.

#### Strategy to Remove or Ameliorate the Barriers to Affordable Housing

In general, Lee County will continue to work with non-profit housing developers and providers to increase the amount of affordable housing and address the regional impacts and barriers to affordable housing in the county.

In addition, quarterly reports are collected from regional partners to evaluate the actions taken toward addressing barriers to fair housing, as noted in the Analysis of Impediments to Fair Housing Choice. Actions taken toward eliminating these barriers will include providing accessibility and modifications in housing units. Barriers to affordable housing will be addressed through the implementation of the housing programs outlined throughout this plan. Partnership between the County, HACFM and non-profit housing development organizations will promote the development of public and affordable housing units away from the central location of many other units in Fort Myers. Future collaboration on affordable housing projects is anticipated to add new and preserve existing affordable housing units throughout Lee County.

The County's specific strategy to remove or ameliorate barriers to affordable housing will be based on the outcome of the updated Housing Equity Plan, which is under development.

### SP-60 Homelessness Strategy – 91.215(d)

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

Much of the outreach to homeless persons is conducted at community events such as the Point-in-Time Count and the Stand Down/Service Day, and by the many caseworkers at community agencies including, the U.S. Department of Veterans Affairs, the Lee County Homeless Coalition, schools, and other entities that encounter individuals and families who are homeless during service delivery or during their regular course of business. The Continuum of Care has also developed and implemented a coordinated assessment process to better address needs, target resources, and ensure engagement with services are more efficient for persons who are homeless. Needs are assessed through the coordinated assessment process during various points of contact at community agencies and through outreach events. Lee County Human and Veteran Services has had a street outreach program for the past six years that focuses on engaging persons experiencing unsheltered homelessness, completing Coordinated Assessment, and linking those persons with housing and supportive services.

Data is also obtained from Lee County's Outreach workers. Outreach staff at Lee Health, Lee County Human and Veteran Services, Community Assisted and Supported Living, and SalusCare engage persons experiencing unsheltered homelessness, and work to connect them to housing and supportive services. HMIS data from fiscal year 2023 indicates a total of 2,703 households comprised of 4,816 individuals entered into Lee County's Coordinated Entry (CE) system. Of these households, 740 (27%) were families with children, 1,072 (40%) were single male households, and 617 (23%) were single female households. However, 21% of households (587) and individuals (1,014) were either active in an emergency shelter at the time of entry into Coordinated Entry or were able to access shelter post-entry into Coordinated Entry.

There are also specific events held throughout the year to raise awareness and promote outreach to persons who are homeless. In addition, the Lee County Homeless Coalition and Lee County Continuum of Care work together to facilitate ongoing community engagement through one-on-one meetings with elected officials and other community leaders.

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

The closure of the emergency shelter at the Bob Janes Empowerment Center has left Lee County with fewer shelter beds. The HOME Tenant-Based Rental Assistance program and Rapid Re-housing program supports the housing needs of individuals and families who are homeless, by providing a permanent housing solution instead of emergency shelter. As additional funding sources become available, Lee County may engage other community partners for the development of additional projects or programs. Emergency shelter, transitional housing needs and affordable housing needs are priority needs for Lee County and may also be addressed through grant funding opportunities, such as the competitive Continuum of Care process, and through other state or local funding streams.

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 plan's goals of providing homeless housing and services will help to prevent homelessness, rehouse, or otherwise permanently house persons who are homeless. The Lee County Continuum of Care has established written standards for prioritization to ensure that persons with especially high needs are linked with adequate housing and supportive services. Additionally, the implementation and subsequent success of the coordinated entry process ensures that persons who are homeless are rapidly linked with appropriate housing resources and support. Ongoing collaboration between service providers and the Continuum of Care, and frequent reviews of HMIS data facilitate the implementation of strategies to reduce the length of time a person experiences homelessness.

These goals will be supported using ESG funding to engage and rapidly re-house persons who are homeless. Other than the funds available through this process, permanent housing needs may be addressed through other resources identified elsewhere in this plan, and through other grant funding opportunities, such as the competitive Continuum of Care process, and through other state or local funding streams.

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

Human and Veteran Services and other local agencies provide many programs and services aimed at preventing homelessness and stabilizing clients. These programs include job training, job readiness, financial management courses, and active case management. Several homelessness prevention programs, active throughout the county, provide assistance with rent and utilities to ensure that persons who are extremely low-income do not become homeless.

In addition, discharge planning agreements are in place with the local foster care agency, mental health and substance abuse provider, jail, and hospital. These agencies refer clients to appropriate service and housing providers to ensure that they are not discharged into homelessness.

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

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

The 2018-2022 American Community Survey and 2016-2020 CHAS data indicates that there are 33,207 units in Lee County which were built prior to 1979. Of those 13,287 units are occupied by families with children present. Because the actual number of housing units with lead-based paint (LBP) is not available, these numbers are estimates.

For the purposes of this plan, a housing unit built before 1980 is presumed to have a higher risk of leadbased paint. Therefore, the total number of owner-occupied and renter-occupied units that were built before 1980, as well as those built before 1980 with children present, are presented as estimates. It is estimated that 33,207 (21.9%) of owner-occupied housing units in Lee County were built prior to 1980, while 13,287 (9%) were built before 1980 and have children present. For renter-occupied housing units, 13,203 (27.7%) were built prior to 1980, while 7,802 (17%) were built prior to 1980 and have children present. Although there is a high percentage of housing units built before 1980, signifying a higher risk of lead-based paint, there is a low percentage of older housing units with children present. A slightly higher percentage of older housing units with children present are occupied by renters.

Lee County will continue to ensure that lead-based paint protocols are followed, as required by 24 CFR Part 35. For homes built prior to 1978, a lead-based paint inspection and clearance report conducted by an EPA certified inspector or risk assessor indicating a lead-based paint hazard free home is required. Lead-Based Paint Notification shall include: The Lead Hazard Information Pamphlet; Appropriate LBP Disclosure Form; Notice of Lead Hazard Evaluation; and notice of the results of any Lead Hazard Reduction Activities conducted on the property. HUD Lead-Based Paint Guidelines are issued pursuant to Section 1017 of the residential Lead-Based Paint Hazard Reduction Act of 1992, which is often referred to as Title X ("Title Ten") because it was enacted as Title X of the Housing and Community Development Act of 1992 (Public Law 102-550). The Guidelines are based on the concepts, definitions and requirements set forth by Congress in Title X.

Continued development of new housing units and rehabilitation to existing units will increase access to housing without hazards.

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

Due to the low incidence of poisoning cases, actions taken may help to lower cases, but due to the low number of homes built prior to 1978 overall impacts will be minor.

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

Activities in homes built before 1978 must be tested, except when the rehabilitation will not disturb any painted surface, like replacing a drain field. For rehabilitation activities less than \$5,000, a lead swipe

test can be conducted. If lead is found, rehab must be done using lead safe work practices. For activities at \$5,000 or more, a lead test must be completed along with a risk assessment.

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

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

There are many antipoverty programs implemented by numerous agencies in Lee County. Antipoverty impacts are inherent in the County's programs in housing, neighborhood development and elimination of homelessness. The goal of Lee County's antipoverty strategies is to help individuals and families rise above the poverty level, become self-sufficient, and eliminate systemic barriers to success. To achieve this goal, Lee County, in conjunction with city, state, regional and federal agencies, and with non-profit following categories: Activities for Children & Youth, Supportive Living and Emergency Assistance. All programs address issues to assist in reducing poverty and assisting low/moderate income households.

Human and Veteran Services provides anti-poverty action by working with neighborhoods to coordinate resources for employment and self-sufficiency programs. Antipoverty efforts of the Family Impact program area consist of homeless programs, emergency assistance (rental, mortgage and utility payments), housing and financial counseling, case management, and educational services. Such programs include a financial literacy education program for families participating in homeless prevention and rehousing programs, and a soft skills employment-training program. Educational services are funded by the Community Services Block Grant and aim to increase self-sufficiency and upward job mobility for low-income households. Participants maintain close contact with case management staff and receive individual supportive services if necessary to ensure successful completion of the programs for substance abuse, mental health, Medicaid, and indigent medical care. Lee County provides additional funds, beyond the state requirements, to increase levels of services, including funding for specialty courts, such as Veterans Treatment Court.

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

Anti-poverty programs, especially those being carried out in target areas, will coordinate with the affordable housing programs outlined here within. Public comments indicate a significant need for additional affordable housing units. Lee County intends to undertake multiple projects to facilitate the development of additional affordable housing units. Actions planned include using CDBG, HOME, and state funds to provide owner occupied housing rehabilitation assistance and down payment assistance. In addition, HOME funds are being allocated for tenant based rental assistance and CHDO and Non-CHDO housing development to facilitate the development of additional affordable housing units. Lee County has implemented the HOPWA Tenant Based Rental Assistance Program (TBRA), which is projected to house the most vulnerable HIV/AIDS households. These housing services are delivered in coordination with case management, financial literacy classes, and job skills training to ensure that households maintain stable housing upon program completion.

### SP-80 Monitoring - 91.230

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

Human & Veteran Services (HVS) staff monitor all contracts on an ongoing basis to inspect, review and report on the agency's compliance with the terms and conditions of the contract, to ensure satisfactory performance. Contracts for HUD-funded projects are reviewed to ensure long-term compliance with program and comprehensive planning requirements. Monitoring is an ongoing process involving continuous communication and evaluation. The process involves frequent telephone/email contact, analysis of reports and audits, and periodic meetings. Contract staff keep fully informed concerning sub-recipient compliance with program requirements and the extent to which technical assistance is needed. As part of this process, staff are alert for fraud, waste, mismanagement or situations with potential for such abuse. Monitoring also provides opportunities to identify program participant accomplishments as well as successful techniques that might be replicated by other sub-recipients.

Monitoring activities may include:

- Review/validation of payment requests (invoices) and supporting documentation.
- Review of program/beneficiary reports and Independent Financial audits (CPA).
- Review of monitoring reports from other funders, which are pertinent to the contracted program.
- Tracking and receipt of other contract deliverables including Section 3, Davis Bacon and other federal requirements.
- On site monitoring and follow up visits as needed (may be scheduled or unscheduled). An onsite may be necessary to clarify/validate information obtained from review of reports, audits, etc. and other applicable regulations. On-site monitoring will take place during the term of the contract or within 30 days of contract expiration.
- Technical Assistance.
- Summarization of monitoring activities or desk review.

Scheduling is prioritized according to the following considerations:

- Complexity and schedule of program/project.
- Size of award, spending pattern and duration of award.
- Agency's prior experience.
- Changes in key personnel.
- Timeliness and accuracy of reporting.
- Previous monitoring issues.

Reviews will address components as applicable for funding source:

- Funding/Program Requirements
- Financial: Timely spending, utilization of funds and match requirements
- Capacity and numbers served
- File Review and Eligibility Compliance.
- A random selection of client files will be selected for review using a targeted goal of reviewing at least 10% of clients served (minimum 10, maximum 50 files).
- Program guidelines and monitoring tools for State or Federally funded projects shall be referenced for additional monitoring requirements.
- Performance Measures/Outcomes
- Prior monitoring issues
- Compliance Issues
- Observation of facility and/or interviews
- Timely submission of Contract Deliverables
- Equipment/Asset Inventory
- Personnel Review
- Policies/Procedure Review
- Record Keeping

A written report is prepared annually for all contracts. If when writing the report, it is discovered, that information is questionable or missing, an attempt can be made to contact the agency to resolve the discrepancy. If the discrepancy and or questions cannot be resolved prior to the issuance of the report, they should be included in the report as either a finding or concern depending on the severity of the issue. The annual report is emailed to the agency Director and copied to the Board Chair no later than 90 days following the end of contract term. If there is a finding or a concern, a Corrective Action Plan response is due within 30 days from issuance of the report.

## **Expected Resources**

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

#### Introduction

The Strategic Plan must identify the federal, state, local and private resources expected to be available to Lee County to address the priority needs and goals identified in the Consolidated Plan. These resources are summarized in SP-35.

Lee County anticipates a total allocation of \$3,127,061 in CDBG funding for the 2024 program year. Program income for CDBG is expected to be approximately \$30,150, and \$1,306,308 in prior-year resources are anticipated. The total anticipated available resources is \$4,463,519 for the 2024 program year. CDBG funds will be used for housing and community development activities including, but not limited to, down payment assistance, housing rehabilitation, public services, public or non-profit improvements, Urban County projects, and administration of the County's CDBG program.

Lee County anticipates a total allocation of \$935,108.38 in HOME funding for the 2024 program year. No program income and no prior-year resources are anticipated for HOME. HOME funds will be used for housing-related activities including, but not limited to, down payment assistance, affordable housing acquisition, rehabilitation, or new construction, Tenant-Based Rental Assistance (TBRA), and administration of the County's HOME program.

Lee County also anticipates a total allocation of \$271,149 in ESG funding for the 2024 program year. No program income and no prior-year resources are anticipated for ESG. ESG funds will be used for homeless street outreach activities, rapid rehousing, and administration of the County's ESG program.

Two additional funding sources, CDBG-DR and ESG-RUSH are also anticipated. The total allocation of CDBG-DR is \$1,107,881,000, and the total allocation of ESG-RUSH is \$1,849,306. Details regarding the CDBG-DR allocation are more fully provided in a separate planning document titled, "Lee County 2023 CDBG-DR Action Plan, Amendment 4", which is posted on the County's website.

The expected amount available during the remainder of the Consolidated Plan (2025-2028) is based on an estimated annual allocation of \$3,166,000 in CDBG funds, \$935,108 in HOME funds, and \$270,000 in ESG funds, excluding program income and prior-year resources as those amounts are unknown currently. This results in an estimated funding amount of \$12,702,939 in CDBG, \$3,740,432 in HOME, and \$1,078,851 in ESG over the remaining four-year period.

Other resources, such as private and non-Federal public sources may become available to Lee County during the program year. For CDBG leveraging, these include local government General Fund dollars, private or nonprofit organizations, or other sources. The County will look to leverage funds, if available, from other agencies and programs to support housing and community development efforts.

The Annual Action Plan must summarize Lee County's priority needs and goals to address during the first year of the Strategic Plan. These goals must be described in quantitative terms. Lee County has selected goal outcome indicators and quantities based on the anticipated performance measures of the 2024 Annual Action Plan. See AP-20.

Tables 53, 56, 58, and 59 show the anticipated resources available in Year 1 (2024) and Years 2-5 (2025-2028) (i.e., remainder) of the five-year planning period.

*HUD FY 2024 Formula Allocation; Notes: Program incomes and prior-year resources are estimated amounts and actual amounts may differ if larger sums are received from loan payoffs or cancelled or underbudget projects. These amounts will be updated during the 2024 program year close-out.

Program	Source	Uses of Funds	Exp	ected Amou	Int Available Y	ear 1	Expected	Narrative Description
	of Funds		Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$	Amount Available Remainder of ConPlan	
CDBG	public - federal	Acquisition Admin and Planning Economic Development Housing Public Improvements Public Services	\$3,127,061	\$30,150	\$1,306,308	\$4,463,519	\$12,702,939	CDBG funds will be used in accordance with 24 CFR 570 and this Consolidated Plan to further address community development, housing, and homeless needs in Lee County.

#### **Anticipated Resources**

Program	Source	Uses of Funds	Exp	ected Amou	unt Available Y	ear 1	Expected	Narrative Description
	of Funds		Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$	Amount Available Remainder of ConPlan \$	
HOME	public - federal	Acquisition Homebuyer assistance Homeowner rehab Multifamily rental new construction Multifamily rental rehab New construction for ownership TBRA	\$935,108.38	\$0	\$0	\$935,108.38	\$3,740,432	HOME funds will be used in accordance with 24 CFR 92 and this Consolidated Plan to address housing needs in Lee County.

Program	Source	Uses of Funds	Exp	ected Amou	unt Available Y	ear 1	Expected	Narrative Description
	of Funds		Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$	Amount Available Remainder of ConPlan \$	
ESG	public - federal	Conversion and rehab for transitional housing Financial Assistance Overnight shelter Rapid re- housing (rental assistance) Rental Assistance Services Transitional housing	\$271,149	\$0	\$0	\$271,149	\$1,078,851	ESG funds will be used in accordance with 24 CFR 576 and this Consolidated Plan to provide housing and services to persons experiencing homelessness in Lee County.
Other – CDBG- DR	public - federal	Other (CDBG- DR)	\$324,071,992	\$0	\$0	\$324,071,992	\$783,809,008	CDBG-DR (Disaster Relief) funds will be used consistent with the Lee County CDBG- DR Action Plan, which is a separate planning document.

Program	Source	Uses of Funds	Exp	ected Amou	unt Available Y	ear 1	Expected	Narrative Description
	of Funds		Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$	Amount Available Remainder of ConPlan \$	
Other –	public	Other (ESG-	\$1,849,306	\$0	\$0	\$1,849,306	\$0	ESG-RUSH funds will be used
ESG-	-	RUSH)						to address the unmet needs
RUSH	federal							of individuals and families
								who are homeless or at risk-
								of homelessness and
								affected by disaster.

Table 58 - 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.

Federal funds will leverage other funds by referring identified at-risk households or homeless households to appropriate programs for prevention or re-housing. Services provided are funded with Lee County General funds, Continuum of Care programs, HOPWA and CSBG. Additionally, State SHIP funds are used to assist low-income persons with down payment assistance and provide match for HOME funded projects. ESG will be matched with County General funds, as well as other resources documented by sub-recipients. Some CDBG funds will be concentrated on public facility or infrastructure improvements and will be used in the targeted areas noted in this Consolidated Plan. These funds will be leveraged with private funds gathered by neighborhood organizations through fundraising.

CDBG funds do not require a local match; however, where applicable, Lee County will leverage CDBG funds with other public and private funding sources. When feasible, CDBG funds will be leveraged with other funds gathered by nonprofit and neighborhood organizations through fundraising. State SHIP funds are used to assist low-income persons with down payment assistance and provide a match for HOME funded projects. The Emergency Shelter Grant (ESG) requires a 1:1 match. The match is met through the County's General Fund contribution, as well as other resources documented by subrecipients. Each agency receiving funding is required to offer some amount of match, if required by the grant program.

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

There are no publicly owned lands or properties that are currently identified for projects in this plan.

#### Discussion

Lee County's anticipated funding allocation from CDBG, HOME, and ESG will address many of the County's goals, including Affordable Housing Construction, Rehabilitation, and Assistance; Public Services and Homeless/Special Needs Services; Shelter, Public Facility, and Infrastructure Improvements; Emergency/Urgent Needs and Disaster Recovery; Urban County Needs; and Program Administration. The County is fortunate to have a network of public service providers to help address these goals through financial leveraging, including other potential Federal funding sources such as SHIP and non-Federal sources. Lee County also partners with Urban County municipalities, County departments, and other agencies to achieve goals.

## Annual Goals and Objectives

## AP-20 Annual Goals and Objectives

#### **Goals Summary Information**

Sort	Goal Name	Start	End	Category	Geographic	Needs Addressed	Funding	Goal Outcome Indicator
Order		Year	Year		Area			
1	Affordable	2024	2028	Affordable	N/A	New Construction	CDBG:	Rental Units Constructed: 1
	Housing			Housing;		and Rehabilitation	\$1,003,633	Household/Housing Units;
	Construction,			Public Housing		for Affordable		Homeowner Housing
	Rehabilitation, and					Housing; Rental	HOME:	Added: 2
	Assistance					and Down Payment	\$841,598	Household/Housing Units;
						Assistance		Homeowner Housing
								Rehabilitation: 39
								Households/Housing Units;
								Direct Financial Assistance
								to Homebuyers: 12
								Households Assisted;
								Tenant-Based Rental
								Assistance/Rapid
								Rehousing: 7 Households
								Assisted

Sort	Goal Name	Start	End	Category	Geographic	Needs Addressed	Funding	Goal Outcome Indicator
Order		Year	Year		Area			
2	Public Services	2024	2028	Non-Housing	N/A	Public Services;	CDBG:	Public Services activities
	and			Community		Public	\$487,961;	other than Low/Moderate
	Homeless/Special			Development;		Safety/Crime		Income Housing Benefit:
	Needs Services			Homeless;		Prevention; Rental	ESG: \$250,813;	11,029 Persons Assisted;
				Non-Homeless		and Down Payment		Homeless Person Overnight
				Special Needs		Assistance	ESG-RUSH:	Shelter: 6,500 Persons
							\$1,849,306	Assisted [Street Outreach];
								Tenant-Based Rental
								Assistance/Rapid
								Rehousing: 29 Households
								Assisted
3	Shelter, Public	2024	2028	Non-Housing	LMA	Homeless/Special	CDBG:	Other: 1 Other [Facilities]
	Facility, and			Community		Needs Housing and	\$981,399	
	Infrastructure			Development;		Shelter; Public		
	Improvements			Homeless;		Facility		
				Non-Homeless		Improvements;		
				Special Needs		Public		
						Infrastructure		
						Improvements		
4	Emergency/Urgent	2024	2028	Affordable	N/A	Emergency/Urgent	CDBG-DR:	Other: 1 Other [Year of
	Needs and			Housing; Non-		Needs	\$324,071,992	CDBG-DR delivery, see
	Disaster Recovery			Housing				narrative]
				Community				
				Development				

Sort	Goal Name	Start	End	Category	Geographic	Needs Addressed	Funding	Goal Outcome Indicator
Order		Year	Year		Area			
5	Urban County	2024	2028	Non-Housing	N/A	Public Services;	CDBG:	Other: 1 Other [Project]
	Needs			Community		Public Facility	\$1,023,206	
				Development		Improvements;		
						Public		
						Infrastructure		
						Improvements		
6	Non-Goal Program	2024	2028	Other:	N/A	N/A	CDBG:	Other: O Other
	Administration			Administration			\$967,320;	
							HOME:	
							\$93,510;	
							ESG: \$20,336	

Table 59 – Goals Summary

### **Goal Descriptions**

1	Goal Name	Affordable Housing Construction, Rehabilitation, and Assistance
	Goal Description	Increase the supply, quality, and availability of affordable housing in Lee County.
2	Goal Name	Public Services and Homeless/Special Needs Services
	Goal Description	Address unmet needs for public services that benefit low- and moderate-income, homeless, and special needs persons and households.
		*GOI includes homeless street outreach activities under Homeless Person Overnight Shelter consistent with HUD guidance.
3	Goal Name	Shelter, Public Facility, and Infrastructure Improvements
	Goal Description	Improve the living environment of low- and moderate-income, homeless, and special needs persons by providing adequate shelter, public facilities, and infrastructure.
		* GOI "Other" = Facilities
4	Goal Name	Emergency/Urgent Needs and Disaster Recovery
	Goal Description	Provide aid before, during, and after an emergency and/or disaster event as dictated by available funding and project eligibility.
		* GOI "Other" = Year of CDBG-DR delivery, see narrative
5	Goal Name	Urban County Needs
	Goal Description	Fund projects in Urban County communities, including Sanibel, Bonita Springs, Fort Myers Beach, and Estero, as dictated by available funding and project eligibility.
		* GOI "Other" = Project

6	Goal Name	Non-Goal Program Administration			
	Goal Administer the County's federally funded grant programs.				
	Description				

Table 60 – Goal Descriptions

### Projects

## AP-35 Projects - 91.220(d)

#### Introduction

This section of the Consolidated Plan describes the specific projects that will be implemented with Community Development Block Grant (CDBG), HOME Investment Partnerships Program (HOME), and Emergency Solutions Grant (ESG) funds. Other federal funding sources include CDBG-DR and ESG-RUSH. HUD has directed grantees to not create a CDBG-DR project in the AP-35 and AP-38 screens, since the CDBG-DR allocation is separately documented in the "Lee County 2023 CDBG-DR Action Plan, Amendment 4", which is posted on the County's website. ESG-RUSH funding is included under the County's ESG project.

**Table 61** shows the projects and activities that will be funded during Year 1 (i.e., 2024) of theConsolidated Plan. Additional project information is provided in the subsequent table.

#### Projects

#	Project Name
1	CDBG Program Administration
2	HOME Program Administration
3	CHDO Housing Development
4	Downpayment Assistance
5	Tenant-Based Rental Assistance (TBRA)
6	Owner Occupied Housing Rehabilitation and Delivery
7	Public Services
8	Non-Profit Capital Improvements/Public Facility/Infrastructure
9	Urban County Projects
10	ESG24 Lee County

Table 61 – Project Information

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

Allocation priorities were confirmed through the citizen participation process, with citizen participation opportunities (e.g., Focus Group and survey) and public hearings with the Community Action Agency (CAA) and Board of County Commissioners to consider funding allocations, projects, and activities. Lee County also considered past program performance and staff recommendations to weigh the feasibility of project implementation. Comments and concerns raised during the citizen participation process were taken into consideration when prioritizing projects.

As mentioned in previous sections, priority needs identified during the Citizen Participation process included:

- New Construction and Rehabilitation for Affordable Housing
- Rental and Down Payment Assistance
- Housing Counseling/Legal Aid
- Homeless and Special Needs Housing and Shelter
- Public Services
- Public Facility Improvements
- Public Infrastructure Improvements
- Code Enforcement/Blight Elimination
- Public Safety/Crime Prevention
- Job Skills/Education
- Emergency/Urgent Needs

Public comments routinely indicated a significant need for additional affordable housing units. Lee County intends to undertake multiple projects to facilitate the development of additional affordable housing units. Obstacles to these projects may include limited availability of units to be acquired or rehabilitated and limited resources available to complete projects. Lee County will ensure that identified units are suitable for affordable housing development through underwriting, and coordination with community partners and other county departments, as required. The greatest obstacle to addressing underserved needs is reduction in funding from federal and state governments.

#### **CDBG-DR Allocation Priorities**

Allocation priorities for CDBG-DR funding are provided in the "Lee County 2023 CDBG-DR Action Plan, Amendment 4" document, which is available on Lee County's website:

#### https://cdbgdr.leegov.com/pages/cb77835fdfe345b19b47371e4f13e85c

Lee County plans the following CDBG-DR expenditures during the 2024 program year. These expenditures are summarized below:

<u>Administrative Costs</u> - \$5,000,000 (Administrative costs to ensure compliant implementation of CDBG-DR programs. No national objective required.)

<u>Recovery and Resiliency Planning</u> - \$18,000,000 (Planning to support recovery and community wide resiliency. No national objective required.)

<u>Rehabilitation, Reconstruction, and Elevation</u> - \$130,500,000 (Assistance to income qualified homeowners to make necessary repairs, reconstruction or elevate homes impacted by Hurricane Ian. LMH Activity.)

<u>Home Purchase Assistance</u> – \$8,346,992 (Assistance to income qualified homebuyers to purchase eligible housing units. LMH Activity.)

<u>Single Family Housing Development</u> - \$40,000,000 (Development of new affordable single-family housing for purchase by income eligible households. LMH Activity.)

<u>Multi-Family Housing Development</u> - \$100,000,000 (Development and rehabilitation of affordable multi-family housing units. LMH Activity.)

<u>Public Services</u> - \$2,225,000 (Long Term Recovery Group – direct public services for Hurricane Ian impacted residents. LMC activity.)

<u>Critical Infrastructure</u> - \$20,000,000 (Critical Infrastructure activities to include public utilities, public facilities, and HMGP match. Urgent Need Activity.)

## AP-38 Project Summary

### **Project Summary Information**

#### Table 62 – Project Summary Information

1	Project Name	CDBG Program Administration			
	Target Area	N/A			
	Goals Supported	Non-Goal Program Administration			
	Needs Addressed	N/A			
	Funding	CDBG: \$967,320			
	Description	Planning and administration of Lee County's federally funded CDBG program			
	Target Date	9/30/2025			
	Estimate the number and type of families that will benefit from the proposed activities	Other: 0 Other			
	Location Description	Lee County Human and Veteran Services (Fort Myers, FL)			
	Planned Activities	Activities for planning and administration of the CDBG program (incl. general administration). CDBG funding summary: \$500,000 from 2024 formula allocation, \$30,150 from program income, \$437,170 from prior-year resources. Program income and prior-year resources are estimated amounts.			
2	Project Name	HOME Program Administration			
	Target Area	N/A			
	Goals Supported	Non-Goal Program Administration			
	Needs Addressed	N/A			
	Funding	HOME: \$93,510			
	Description	Planning and administration of Lee County's federally funded HOME program			
	Target Date	9/30/2025			

	Estimate the number and type of families that will benefit from the proposed activities	Other: 0 Other
	Location Description	Lee County Human and Veteran Services (Fort Myers, FL)
	Planned Activities	Activities for planning and administration of the HOME program (incl. general administration). HOME funding summary: \$93,510.38 from 2024 formula allocation.
3	Project Name	CHDO Housing Development
	Target Area	N/A
	Goals Supported	Affordable Housing Construction, Rehabilitation, and Assistance
	Needs Addressed	New Construction and Rehabilitation for Affordable Housing
	Funding	HOME: \$165,000
	Description	Acquisition and rehabilitation or new construction of housing units
	Target Date	9/30/2025
	Estimate the number and type of families that will benefit from the proposed activities	Rental Units Constructed: 1 Household Housing Units; Homeowner Housing Added: 2 Household Housing
	Location Description	Lee County
	Planned Activities	This project will consist of the acquisition and rehabilitation or new construction of 3 housing units. HOME funding summary: \$165,000 from 2024 formula allocation.
4	Project Name	Downpayment Assistance
	Target Area	N/A
	Goals Supported	Affordable Housing Construction, Rehabilitation, and Assistance
	Needs Addressed	Rental and Down Payment Assistance
	Funding	CDBG: \$122,064
		HOME: \$376,598
	Description	Downpayment assistance
	Target Date	9/30/2025

	Estimate the number and type of families that will benefit from the proposed activities	Direct Financial Assistance to Homebuyers: 12 Households Assisted (3 households with CDBG, 9 households with HOME)
	Location Description	Lee County
	Planned Activities	This project will provide for down payment assistance to eligible homebuyers in Lee County. CDBG funding summary: \$122,064 from prior-year resources. Prior-year resources are estimated amounts. HOME funding summary: \$376,598 from 2024 formula allocation.
5	Project Name	Tenant-Based Rental Assistance (TBRA)
	Target Area	N/A
	Goals Supported	Affordable Housing Construction, Rehabilitation, and Assistance
	Needs Addressed	Rental and Down Payment Assistance
	Funding	HOME: \$300,000
	Description	Tenant-based rental assistance (TBRA)
	Target Date	9/30/2025
	Estimate the number and type of families that will benefit from the proposed activities	Tenant-based rental assistance/Rapid Rehousing: 7 Households Assisted
	Location Description	Lee County
	Planned Activities	This project will provide tenant-based rental assistance in support of 7 households. HOME funding summary: \$300,000 from 2024 formula allocation.
6	Project Name	Owner Occupied Housing Rehabilitation and Delivery
	Target Area	N/A
	Goals Supported	Affordable Housing Construction, Rehabilitation, and Assistance
	Needs Addressed	New Construction and Rehabilitation for Affordable Housing
	Funding	CDBG: \$881,569
	Description	Rehabilitation or reconstruction of housing units
	Target Date	9/30/2025

	Estimate the number and type of families that will benefit from the proposed activities	Homeowner Housing Rehabilitated: 39 Household Housing Units
	Location Description	Lee County and Lee County Human and Veteran Services (Fort Myers, FL)
	Planned Activities	This project will target the rehabilitation or reconstruction of housing units and includes funds to support staff salaries and other costs for housing rehabilitation or reconstruction. CDBG funding summary: \$665,000 from 2024 formula allocation, \$216,569 from prior-year resources. Prior-year resources are estimated amounts.
7	Project Name	Public Services
	Target Area	N/A
	Goals Supported	Public Services and Homeless/Special Needs Services
	Needs Addressed	Public Services; Public Safety/Crime Prevention
	Funding	CDBG: \$487,961
	Description	Services that help prevent homelessness and promote community engagement
	Target Date	9/30/2025
	Estimate the number and type of families that will benefit from the proposed activities	Public Service activities other than Low/Moderate Income Housing Benefit: 11,029 Persons Assisted
	Location Description	Lee County
	Planned Activities	This project will provide services and other activities that help prevent homelessness and promote community engagement, which may include, but are not limited to, supporting youth and family nutrition, and community and neighborhood policing. CDBG funding summary: \$469,059 from 2024 formula allocation, \$18,902 from prior-year resources. Prior-year resources are estimated amounts.
8	Project Name	Non-Profit Capital Improvements/Public Facility/Infrastructure
	Target Area	N/A
	Goals Supported	Shelter, Public Facility, and Infrastructure Improvements

Needs Addressed         Homeless/Special Needs Shelter and           Improvements; Public Infrastructure	- ,
Funding CDBG: \$981,399	
DescriptionAcquisition or capital improvementspublic facility	for non-profit organization or
Target Date         9/30/2025	
Estimate the numberOther: 1 Other [Facility]and type of familiesthat will benefit fromthe proposedactivities	
Location Description Lee County	
Planned ActivitiesThis project will support the acquisitie improvement project for, a non-profi that serves low/moderate income pe \$981,399 from 2024 formula allocation	t organization or public facility rsons. CDBG funding summary:
9 Project Name Urban County Projects	
Target Area N/A	
Goals Supported Urban County Needs	
Needs AddressedPublic Services; Public Facility ImprovImprovements	ements; Public Infrastructure
Funding         CDBG: \$1,023,206	
<b>Description</b> CDBG-eligible projects benefiting Urb	an County communities
Target Date         9/30/2025	
Estimate the numberOther: 1 Other [Project]and type of familiesthat will benefit fromthe proposedactivities	
Location Description Sanibel, Bonita Springs, Fort Myers Be	each, and Estero, FL
Planned ActivitiesPlanned activities to be dictated by planned activities to be dictated by plann	1,603 from 2024 formula
are estimated amounts.	

10	Target Area	N/A
	Goals Supported	Public Services and Homeless/Special Needs Services
	Needs Addressed	Public Services
	Funding	ESG: \$271,149
		ESG-RUSH: \$1,849,306
	Description	Homeless services
	Target Date	9/30/2025
	Estimate the number and type of families that will benefit from the proposed activities	Homeless Person Overnight Shelter: 6,500 Persons Assisted [Street Outreach]; Tenant-based Rental Assistance/Rapid Rehousing: 4 Households Assisted (ESG) Tenant-based Rental Assistance/Rapid Rehousing: 25 Households Assisted (ESG-RUSH)
	Location Description	Lee County Human and Veteran Services (Fort Myers, FL)
	Planned Activities	Project funds will be used to provide rapid re-housing for persons who are experiencing homelessness or at-risk of homelessness, street outreach services, and program administration. ESG funding summary: \$271,149 from 2024 formula allocation. ESG-RUSH funding summary: \$1,849,306 from total allocation.

## 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.

Lee County will continue to focus the expenditure of CDBG funds in eligible low- and moderate-income areas (LMA) and for activities that benefit low- and moderate-income individuals (LMI) outside of these areas. For the 2024 program year, Lee County has programed approximately 0% of its CDBG allocation toward public improvements in eligible LMA neighborhoods (see Table 25).

#### *0% of CDBG Allocation

CDBG funds, however, will be used in unincorporated Lee County and Urban County communities (Sanibel, Bonita Springs, Fort Myers Beach, and Estero), based on LMA neighborhood eligibility.

HOME and ESG funds will be used anywhere in unincorporated Lee County and Urban County communities. Maps showing the location of low- and moderate-income areas and concentrations of racial minority or ethnicity populations are included in the Grantee Unique Appendices (attachment).

#### **Geographic Distribution**

Target Area	Percentage of Funds
Low- and Moderate-Income Areas (LMA)	0%

Table 63 - Geographic Distribution

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

Lee County attempts to balance its use of federal and state funds to assist low-income individuals and families living in impacted areas, but to also provide housing and public services outside of racial/ethnic and low-income concentrations. Housing rehabilitation and public services will be disbursed based on income eligibility rather than geographic location to provide such opportunities throughout unincorporated Lee County based on individual or household need.

Lee County also abides by its Urban County designation, and coordinates with partner municipalities through Urban County agreements, to fund projects in Sanibel, Bonita Springs, Fort Myers Beach, and Estero. Otherwise, funding is allocated to projects in unincorporated Lee County based on income eligibility, whether area or client based as defined by HUD.

#### Discussion

Currently, Lee County does not have specific designated "Target Areas" other than HUD-designated LMA neighborhoods. Lee County has identified 10 projects to implement the goals of the Strategic Plan during the first year of the 2024-2028 Consolidated Plan. These projects benefit low- and moderate-income persons in unincorporated Lee County and within eligible low- and moderate- income areas of

the County. Only capital improvements (i.e., public facility and infrastructure improvements) are location dependent. Projects with countywide benefit include downpayment assistance, housing rehabilitation/project delivery, public services, and administration of the grant programs.

## Affordable Housing

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

#### Introduction

Affordable housing will be provided primarily through CDBG and HOME funding. Additional matching funding sources for affordable housing may include State Housing Initiatives Partnership (SHIP) funding (State funding) if available. SHIP funds may be used to provide down payment assistance for qualified buyers or to supplement affordable housing development. Lee County will also continue to search for additional funding from other sources to support the development of affordable housing units.

One Year Goals for the Number of Households to be Supported	
Homeless	29
Non-Homeless	61
Special-Needs	0
Total	90

Table 64 - One Year Goals for Affordable Housing by Support Requirement

One Year Goals for the Number of Households Supported Through	
Rental Assistance	36
The Production of New Units	3
Rehab of Existing Units	39
Acquisition of Existing Units	12
Total	90

Table 65 - One Year Goals for Affordable Housing by Support Type

#### Discussion

An estimated 65 households will be supported during the 2024 program year, using regular CDBG, HOME, or ESG funding. Another 25 households will be supported using ESG-RUSH. The total number of households to be supported during the 2024 program year is 90 households.

Twenty-nine (29) homeless households will be assisted with ESG or ESG-RUSH rapid re-housing. Another seven (7) non-homeless households will be assisted with Tenant-Based Rental Assistance (TBRA). Three (3) new rental or homeowner housing units will be constructed by a qualified CHDO. An estimated 39 housing units will be rehabilitated, and 12 housing units will be acquired through downpayment assistance to be occupied by income-eligible homeowners.

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

#### Introduction

This section of the Annual Action Plan describes what actions the Lee County will take during the 2024 program year to carry out the public housing strategy identified in the Strategic Plan.

The HACFM and LCHA administer programs that deliver housing assistance to low- and very low-income persons in Lee County. These include public housing, project-based vouchers, tenant-based vouchers (Housing Choice Vouchers or HCVs), and special purpose voucher activities. Combined, these activities supply approximately 2,186 publicly assisted housing units in the Lee County area.

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

Due to a lack of affordable housing options, there is a great demand for public housing units and housing choice vouchers. This has resulted in a significant waiting list for both types of housing, which is regularly closed. The Public Housing waitlists opens one (1) time per year for a two (2) week period. During this two (2) week period, it is likely that over 2,000 names will be placed on the waitlists. Waitlists are monitored throughout the year to ensure they are opened as often as needed.

HACFM is currently undertaking the "Greater Dunbar Initiative", a massive redevelopment of the Southward Village complex. The Greater Dunbar Initiative will address the needs of residents in the 199unit Southward Village public housing community with improved opportunities. Specifically, the transformed Southward Village site will include 375 new mixed-income apartments, of which 159 will be reserved for Southward Village residents. An additional 40 homes will be available at a 90-unit development on Cleveland Avenue. All housing will be supported with new infrastructure and complemented with amenities including a clubhouse, fitness center, business center, parks and playgrounds throughout the revitalized village. Construction (Demolition) has started as of May 2024.

HACFM continues to promote a safe living environment for all residents. HACFM continues to partner and works with the local police department to add enhanced security at all properties. The HACFM works cooperatively with Lee County and the CoC and private entities in the provision of public and subsidized housing within Lee County. The HACFM administers public housing for seniors and families in addition to the Housing Choice Voucher (HCV) program that provides financial rental assistance to eligible individuals and families based upon income.

Lee County Plans to use CDBG and HOME funds to continue to offer public housing vouchers.

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

The Housing Authority of the City of Fort Myers (HACFM) continues to promote current Housing Choice Voucher (HCV) participants to join the HCV Family Self Sufficiency (FSS) program and Homeownership

program. The FSS program was designed to connect families receiving subsidized housing assistance with access to community services and resources such as employment training, job-readiness, homeownership education, etc. necessary to advance families toward self-sufficiency. HACFM also continues to offer a Community Supportive Services (CSS) program for residents. The purpose of the CSS program is to provide support services such as job-skills training, childcare, transportation, and adult/youth education programs. Support services are vital in transitioning families into self-sufficiency.

HACFM continues to grow its number of HCV Homeownership Vouchers. HACFM continues to encourage interested residents to participate in the HCV FSS program offered at HACFM. HACFM continues to offer strategies to encourage homeownership, as well as financial literacy and budget classes to all HCV clients. HACFM continues to believe that families with more education and control over money will be able to provide more for themselves, while potentially moving toward homeownership. As a HUD certified housing counseling agency, HACFM provides an array of housing counseling services for public housing and Section 8 residents through the FSS program. Counseling services include but not limited to: Home Buyer Education classes, debt reductions, budgeting, credit restoration, mortgage qualifications, foreclosure prevention, pre & post purchase counseling, in addition to assistance to renters. HACFM has a Senior Services Coordinator on staff to assists with senior services of varying degrees.

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

Neither the HACFM nor LCHA is designated as troubled.

#### Discussion

Affordable housing needs are met by multiple service providers in the Lee County area. The HACFM and CoC currently administers public housing units and tenant-based vouchers (HCVs). The HACFM and CoC will continue to administer vouchers and will ensure that residents are housed in coordination with other housing providers. The County will continue to coordinate referrals with the HACFM, LCHA and greater CoC in order to connect low-income residents with housing options.

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

Lee County, the Continuum of Care (CoC), and local foundations and non-profit public service providers work together to develop and implement a comprehensive strategy to address homelessness. These efforts include the Point-in-Time Count, street outreach activities, and other supportive services for persons experiencing homelessness or at-risk of homelessness.

# 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

Much of the outreach to homeless persons is conducted at community events such as the Point-in-Time Count and the Stand Down/Service Day, and by the many caseworkers at community agencies including, the U.S. Department of Veterans Affairs, Lee County Homeless Coalition, Community Cooperative, Salvation Army, Centerstone, schools, and other entities that encounter individuals and families who are homeless during service delivery or during their regular course of business. The Continuum of Care has also developed and implemented a coordinated assessment process to better address needs, target resources, and ensure engagement with services are more efficient for persons who are homeless. Needs are assessed through the coordinated assessment process during various points of contact at community agencies and through outreach events. Lee County Human and Veteran Services implemented a street outreach program six years ago that focuses on engaging persons experiencing unsheltered homelessness, completing Coordinated Assessment, and linking those persons with housing and supportive services.

Data is also obtained from Lee County's Outreach workers. Outreach staff at Lee Health, Lee County Human and Veteran Services, Community Assisted and Supported Living, and SalusCare engage persons experiencing unsheltered homelessness, and work to connect them to housing and supportive services. HMIS data from fiscal year 2023 indicates a total of 2,703 households comprised of 4,816 individuals entered into Lee County's Coordinated Entry (CE) system. Of these households, 740 (27%) were families with children, 1,072 (40%) were single male households, and 617 (23%) were single female households. However, 21% of households (587) and individuals (1,014) were either active in an emergency shelter at the time of entry into Coordinated Entry or were able to access shelter post-entry into Coordinated Entry.

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

The closure of the emergency shelter at the Bob Janes Empowerment Center has decreased the number of available beds for emergency shelter in Lee County. The HOME Tenant-Based Rental Assistance program and Rapid Re-housing program supports the housing needs of individuals and families who are homeless, by providing a permanent housing solution instead of emergency shelter. As additional funding sources become available, Lee County may engage other community partners for the development of additional projects or programs. Emergency shelter, transitional housing needs and affordable housing needs are priority needs for Lee County and may also be addressed through grant funding opportunities, such as the competitive Continuum of Care process, and through other state or local funding streams.

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 plan's goals of providing homeless housing and services will help to prevent homelessness, rehouse, or otherwise permanently house persons who are homeless. The Lee County Continuum of Care has established written standards for prioritization to ensure that persons with especially high needs are linked with adequate housing and supportive services. Additionally, the implementation and subsequent success of the coordinated entry process ensures that persons who are homeless are rapidly linked with appropriate housing resources and support. Ongoing collaboration between service providers and the Continuum of Care, and frequent reviews of HMIS data facilitate the implementation of strategies to reduce the length of time a person experiences homelessness.

These goals will be supported using ESG funding to engage and rapidly re-house persons who are homeless. Other than the funds available through this process, permanent housing needs may be addressed through other resources identified elsewhere in this plan and through other grant funding opportunities such as the competitive Continuum of Care process and through other state or local funding streams.

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

Human and Veteran Services and other local agencies provide many programs and services aimed at preventing homelessness and stabilizing clients. These programs include job training, job readiness, financial management courses, and active case management. Several homelessness prevention programs, active throughout the county, provide assistance with rent and utilities to ensure that persons who are extremely low-income do not become homeless. These programs have streamlined the application, assistance, and referral process for persons who are homeless by participating in the coordinated entry process implemented by the Continuum of Care.

In addition, discharge planning agreements are in place with the local foster care agency, mental health and substance abuse provider, jail, and hospital. These agencies refer clients to appropriate service and housing providers to ensure that they are not discharged into homelessness.

#### Discussion

In program year 2024-2025, Lee County Human and Veteran Services, as the lead entity for the Continuum of Care, will continue to work with the HACFM, LCHA, and the Lee County Homeless Coalition, along with local foundations and other agencies to implement and expand homelessness prevention and assistance measures throughout the county.

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

#### Introduction

This section of the Annual Action Plan summarizes actions Lee County will undertake during the program year to reduce barriers to affordable housing.

### 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 current Analysis of Impediments to Fair Housing for Lee County (2019-2023), which is in the process of being updated as the Housing Equity Plan, found a number of local barriers. Many of the barriers are continued barriers from the previous Consolidated Plan update, which identified barriers based on race, national origin, and/or disability; loan application denial rates being lower for White applicants than other races/ethnicities; opposition to public housing development; insufficient accessible housing units; insufficient transportation systems; and inequitable geographic distribution of public housing units. Plan goals and projects will attempt to address these barriers.

In general, Lee County will continue to work with non-profit housing developers and providers to increase the amount of affordable housing and address the regional impacts and barriers to affordable housing in the County. In addition, quarterly reports are collected from regional partners to evaluate the actions taken toward addressing barriers to fair housing as noted in the Analysis of Impediments. Actions taken toward eliminating these barriers will include providing accessibility and modifications in housing units. Barriers to affordable housing will be addressed through the implementation of the housing programs outlined throughout this plan. Partnership between the County, HACFM and non-profit housing development organizations will promote the development of public and affordable housing units away from the central location of many other units in Fort Myers. Future collaboration on affordable housing projects is anticipated to add new and preserve existing affordable housing units throughout Lee County.

#### Discussion

Lee County will continue to implement the programs that it utilizes to remove or ameliorate the negative effects of housing discrimination and identified barriers to affordable housing. Lee County will continue to work with stakeholders, citizens, and other regional organizations to increase the amount of affordable housing and address the regional impacts and barriers to affordable housing in the County. Lee County, in coordination with other local service providers, plans to undertake the projects and associated activities, as noted in this plan, to address underserved homeless population needs. Lee County's 2019-2028 Continuum of Care Strategic Plan outlines the goals and objectives the CoC plans to carry out to ensure that homelessness in Lee County is a rare, brief, and one-time experience.

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

#### Introduction

This section of the plan describes the actions that Lee County will take to carry out the following strategies in the Consolidated Plan:

- Affordable Housing Construction, Rehabilitation, and Assistance
- Public Services and Homeless/Special Needs Services
- Shelter, Public Facility, and Infrastructure Improvements
- Emergency/Urgent Needs and Disaster Recovery
- Urban County Needs
- Non-Goal Program Administration

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

Lee County, in coordination with other local service providers, plans to undertake the projects and associated activities, as noted in this plan, to address underserved needs such as lack of affordable housing, payment assistance, various types of counseling, education, public safety, shelters, public services and facilities, infrastructure, economic development and non-profit capital improvements. Projects and activities such as these are not anticipated to encounter obstacles during completion.

Public comments indicate a significant need for additional affordable housing units. Lee County intends to undertake multiple projects to facilitate the development of additional affordable housing units. Obstacles to these projects may include limited availability of units to be acquired or rehabilitated and limited resources available to complete projects. Lee County will ensure that identified units are suitable for affordable housing development through underwriting and coordination with community partners and other county departments, as required.

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

Actions planned include using CDBG, HOME, and State SHIP funds to provide owner occupied housing rehabilitation assistance and down payment assistance. In addition, HOME funds are being allocated for tenant based rental assistance and CHDO housing development to facilitate the development of additional affordable housing units. Lee County has implemented and plans to continue the HOPWA Tenant Based Rental Assistance Program (TBRA). Partnerships with the Public Housing Authorities and other local housing providers will provide additional resources to foster and maintain affordable housing through new construction, rehabilitation, and referral to currently available units.

To affirmatively further Fair Housing, Lee County Human and Veteran Services (HVS) regularly shares information about Fair Housing during its interactions with housing providers and the public. Over the past year, HVS has distributed Fair Housing flyers, posted HUD Fair Housing materials on social media

platforms, held discussions regarding housing needs (including Fair Housing issues), and maintained a Fair Housing banner on the County's HVS Reach App and HVS Fair Housing website. This information is shared not only at the department, but during offsite events such as the Building Industry Association Meeting, Attainable Housing Meeting, Story Time (at Fort Myers Library), and Movie in the Park. HVS actively works to affirmatively further Fair Housing by providing accessible information and active outreach. Based on consultation with housing providers, potential bases of housing discrimination in Lee County include familial status, income source, and disability, with housing affordability, insurance premiums, and limited supply as compounding factors.

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

Homes built prior to 1978, where painted surfaces will be disturbed, will be inspected for lead-based paint (LBP). If lead is detected during the inspection, an assessment will be completed and followed by abatement. Lee County will continue to ensure that lead-based paint protocols are followed as required by 24 CFR Part 35. For homes built prior to 1978, a lead-based paint inspection and clearance report conducted by an EPA certified inspector or risk assessor indicating a lead-based paint hazard free home is required. Lead-Based Paint Notification shall include: the Lead Hazard Information Pamphlet; appropriate LBP Disclosure Form; notice of Lead Hazard Evaluation; and notice of the results of any Lead Hazard Reduction Activities conducted on the property. HUD Lead-Based Paint Guidelines are issued pursuant to Section 1017 of the residential Lead-Based Paint Hazard Reduction Act of 1992, which is often referred to as Title X ("Title Ten") because it was enacted as Title X of the Housing and Community Development Act of 1992 (Public Law 102-550). The Guidelines are based on the concepts, definitions and requirements set forth by Congress in Title X.

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

Human and Veteran Services provides anti-poverty action by working with neighborhoods to coordinate resources for employment and self-sufficiency programs. Antipoverty efforts of the Family Impact program and the Community Supportive Services Center (CSS) (through HACFM) consist of homeless programs, emergency assistance (rental, mortgage and utility payments), housing and financial counseling, case management, and educational services. Such programs include a financial literacy education program for families participating in homeless prevention and rehousing programs, and a soft skills employment-training program. Educational services are funded by the Community Services Block Grant and aim to increase self-sufficiency and upward job mobility for low-income households. Participants maintain close contact with case management staff and receive individual supportive services if necessary to ensure successful completion of the programs and long-term self-sufficiency. Additional antipoverty efforts include funding state mandated programs for substance abuse, mental health, Medicaid, and indigent medical care. Lee County provides additional funds, beyond the state requirements, to increase levels of services, including funding for specialty courts, such as Veterans Treatment Court.

#### Actions planned to develop institutional structure

Institutional structure is not deemed lacking. Gaps in providing programs or services that meet the priority needs will be evaluated on an annual basis, but at the onset of this planning cycle, there are no identified gaps to implementation. Continued coordination will help to ensure an effective institutional structure.

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

Lee County works to bring together different groups and agencies, including private housing and social service agencies, when appropriate for both specific projects and for overall planning. In addition, the County works with local housing agencies to leverage resources to meet housing, infrastructure, and other service needs throughout the county. Human and Veteran Services is currently partnering with the Public Housing Authorities and local service providers to utilize existing and apply for additional HUD Mainstream Vouchers which will facilitate enhanced collaboration among service providers.

Lee County, the Housing Authority of the City of Fort Myers, Veterans Affairs, and the Lee County Homeless Coalition also participated in the Zero: 2016 initiative which effectively ended Veteran homelessness in Lee County. As the lead agency for the Continuum of Care, Human and Veteran Services, in coordination with other agencies, plans to undertake the projects and associated activities, as noted in this plan, to address underserved needs such as lack of affordable housing, payment assistance, various types of counseling, education, public safety, shelters, public services and facilities, infrastructure, economic development and non-profit capital improvements.

#### Discussion

Lee County is committed to continuing its participation and coordination with Federal, State, local governments, and other agencies, along with the public and private sectors, to serve the needs of income-eligible individuals and families in the community. In particular, the Lee County HVS will continue to closely coordinate with Lee County departments and Urban County jurisdictions regarding housing and community development initiatives.

### **Program Specific Requirements**

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

The following describes the program specific requirements of Lee County's federal funding sources, including CDBG, HOME, and ESG.

#### 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	\$30,150
next program year and that has not yet been reprogrammed	
2. The amount of proceeds from section 108 loan guarantees that will be used during the	0
year to address the priority needs and specific objectives identified in the grantee's	
strategic plan.	
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	0
has not been included in a prior statement or plan	
5. The amount of income from float-funded activities	0
Total Program Income:	\$30,150

#### **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	78.32%
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.	

#### HOME Investment Partnership Program (HOME) Reference 24 CFR 91.220(I)(2)

1. A description of other forms of investment being used beyond those identified in Section 92.205 is as follows:

Not applicable.

2. A description of the guidelines that will be used for resale or recapture of HOME funds when used for homebuyer activities as required in 92.254, is as follows:

Lee County has elected to use Recapture as the primary method of ensuring affordability for low-tomoderate income homebuyers; however, resale provisions will be used when HOME funds are provided directly to a developer to reduce the development costs thereby making the price of the home affordable to the buyer. Any recaptured funds will be deposited in a HOME Trust Fund, (depending on original source of funds), to be utilized for any eligible activity within Lee County. The full version of the Lee County Resale and Recapture Policy is available at Human and Veteran Services.

3. A description of the guidelines for resale or recapture that ensures the affordability of units acquired with HOME funds. See 24 CFR 92.254(a)(4) are as follows:

Any recaptured funds will be deposited in a HOME Trust Fund (depending on original source of funds) to be utilized for any eligible activity within Lee County expanding the number of affordable housing units. Depending on the circumstances of recapture, the affordability of the units may be waived (such as the case in a foreclosure). In the case of resale, the unit will be resold to an eligible buyer, preserving affordability. The full version of the Lee County Resale and Recapture Policy is available at the Human and Veteran Services.

4. Plans for using HOME funds to refinance existing debt secured by multifamily housing that is rehabilitated with HOME funds along with a description of the refinancing guidelines required that will be used under 24 CFR 92.206(b) are as follows:

Not applicable.

5. If applicable to a planned HOME TBRA activity, a description of the preference for persons with special needs or disabilities. (See 24 CFR 92.209(c)(2)(i) and CFR 91.220(l)(2)(vii)).

Lee County's Coordinated Entry system identifies and prioritizes service needs for individuals and families seeking placement in Rapid Rehousing programs as follows:

- 1) <u>Parents with Children</u>: The first prioritization factor targets households with children experiencing homelessness. This score is based on the number of children indicated on the Households Housing Needs Assessment.
- 2) <u>Household member 60 years of age or older</u>: The second prioritization factor targets individuals who are 60 years of age or older. This score is based on the household member's date of birth as recorded in HMIS.
- 3) <u>Fleeing Domestic Violence</u>: The third prioritization criteria will expedite placement for individuals and families who meet HUD's definition of Category 2 homelessness. This score is based on household member's responses on the Coordinated Assessment screen in HMIS.
- 4) <u>Veteran Status</u>: The fourth prioritization criteria will expedite placement into housing for individuals who have served at least one day of active duty in the United States Armed Forces, or who were disabled during a period of active-duty training. This score is based on household member's responses on the Client Enters Project screen in HMIS.
- 5) <u>First Time Homeless</u>: The fifth prioritization criteria will target individuals and families homeless for the first time as recorded on the Client Enters Project screen in HMIS.
- 6. If applicable to a planned HOME TBRA activity, a description of how the preference for a specific category of individuals with disabilities (e.g. persons with HIV/AIDS or chronic mental illness) will narrow the gap in benefits and the preference is needed to narrow the gap in benefits and services received by such persons. (See 24 CFR 92.209(c)(2)(ii) and 91.220(l)(2)(vii)).

The preference for a specific category of individuals with disabilities in HOME TBRA activities is essential for narrowing the gap in benefits and services received by such persons. It ensures equitable access to housing resources, addresses disparities in service delivery, and promotes inclusion within the community. By strategically targeting resources and support, this preference contributes to enhancing the quality of life and independence of individuals with disabilities.

If applicable, a description of any preference or limitation for rental housing projects. (See 24 CFR 92.253(d)(3) and CFR 91.220(I)(2)(vii)). Note: Preferences cannot be administered in a manner that limits the opportunities of persons on any basis prohibited by the laws listed under 24 CFR 5.105(a).

While preferences in rental housing projects can be beneficial for addressing specific housing needs, they must be carefully structured and administered to comply with fair housing laws and ensure equitable access to housing opportunities for all eligible individuals and households.

#### Emergency Solutions Grant (ESG) Reference 91.220(I)(4)

1. Include written standards for providing ESG assistance (may include as attachment)

The existing Lee County Policy and Procedure manual and CoC Written Standards and Coordinated Entry Policies will be used to outline standards for the ESG rapid re-housing project. CoC Written Standards and Coordinated Entry Policies are attached to this plan.

In general, eligibility will be determined prior to providing assistance. Applicants must have incomes at or below 50% of the area median income. Households must meet the HUD's definition of homelessness under Category 1, any subsequent CoC Program Notice of Funding Availability (NOFA) eligibility requirements, and any additional funder eligibility requirements. Once meeting the rapid re-housing eligibility requirements, households are then prioritized by Lee County's target populations.

Income inclusions, income exclusions, and documentation standards can be found in the referenced manual. Verification and documentation of eligibility will be maintained in participant case files. Provided the requirements of each individual self-sufficiency plan are met, eligible households can receive rent assistance up to 24 months. Exceptions may be made to the duration of assistance after management review and approval.

For the shelter operations component of ESG, standards for assistance will be detailed in the sub recipient provider contract and will stipulate eligible expenditures, beneficiary reporting requirements, and other procedural components of the program.

2. If the Continuum of Care has established centralized or coordinated assessment system that meets HUD requirements, describe that centralized or coordinated assessment system.

The Coordinated Entry System has three goals:

- to help people move through the homeless service system faster,
- reduce new entries into homelessness through prevention and diversion resources, and
- improve data collection and quality to provide accurate information on what assistance consumers need.

The Lee County Continuum of Care (CoC) has developed a coordinated entry system which uses the existing HMIS system. The process includes the use of a standardized assessment for all individuals, as well as coordinated referral and housing placement processes to ensure that people experiencing homelessness receive appropriate assistance with both immediate and long-term housing and service needs. In addition, monthly meetings are held to ensure especially high-risk clients are linked with the appropriate services. Quarterly planning workshops with outreach workers and service providers are also held to obtain input on the design and help to secure buy-in for the

system. Training for local agencies continues to be provided on an on-going basis as needed. The CoC Governing Board has reviewed and updated the Coordinated Entry Policies and Procedures in accordance with CPD Notice 17-01.

3. Identify the process for making sub-awards and describe how the ESG allocation available to private nonprofit organizations (including community and faith-based organizations).

Lee County has determined the programs to receive assistance and their allocations based on comments received by the public and in consultations during the planning process, as well as staff review of program success to date.

4. If the jurisdiction is unable to meet the homeless participation requirement in 24 CFR 576.405(a), the jurisdiction must specify its plan for reaching out to and consulting with homeless or formerly homeless individuals in considering policies and funding decisions regarding facilities and services funded under ESG.

This requirement has been met.

5. Describe performance standards for evaluating ESG.

Overall evaluation of the ESG program will be undertaken by the Continuum of Care Governing Board. The Governing Board has established the following performance targets for all CoC and ESG funded projects:

- 1) 65% of persons in ES, SH, TH, or PH-RRH should be exited to permanent housing destinations
- 2) 45% of persons in CoC and ESG funded programs should maintain OR increase their income
- 3) No more than 35% of persons who were exited from CoC and ESG funded programs should return to homelessness within 1 year

Performance standards may be evaluated on a project-by-project basis. At minimum, Lee County expects to assist 68 households through HOME and ESG funded re-housing activities. Success of these programs will be measured by examining the beneficiaries served and system performance measures.

#### Discussion

Lee County anticipates \$30,150 in CDBG program income. The percentage of overall benefit to low- and moderate-income persons is estimated to be 78.32%.

### **Appendix - Alternate/Local Data Sources**

#### L Data Source Name

2018-2022 ACS

List the name of the organization or individual who originated the data set.

United States Census Bureau, American Community Survey (ACS)

#### Provide a brief summary of the data set.

The ACS is a nationwide survey that collects and produces information on demographic, social, economic, and housing characteristics about the nation's population every year.

#### What was the purpose for developing this data set?

The primary purpose of the ACS is to measure the changing social and economic characteristics of the U.S. population. This information provides an important tool for communities, such as Lee County, to see how their population is changing and to make informed decisions using the best data available.

Provide the year (and optionally month, or month and day) for when the data was collected.

60 months of data collected between January 1, 2018, and December 31, 2022 (5-year estimates)

Briefly describe the methodology for the data collection.

In general, the annual sample size for ACS data is approximately 1-in-40 housing units (with some variation), administered as 12 independent monthly samples, and collected and organized by census geography (e.g. block group, tract, place, etc.). All geographies are summarized with data produced annually based on the accumulated responses to the previous 5 years of data collection.

Describe the total population from which the sample was taken.

The ACS data used in the Consolidated Plan was collected for Lee County as a whole, or for the Lee County Urban County grantee geography (i.e., less the cities of Cape Coral and Fort Myers) as applicable, at the census block group, tract, and place level. See also above for methodology for sample collection.

Describe the demographics of the respondents or characteristics of the unit of measure, and the number of respondents or units surveyed.

The demographics of the respondents are represented by the ACS data set. The number of respondents surveyed is unknown to the user, but the data source citation is the 2018-2022 ACS 5-year estimates (United States Census Bureau).

2 Data Source Name

2016-2020 ACS

#### List the name of the organization or individual who originated the data set.

United States Census Bureau, American Community Survey (ACS)

The ACS is a nationwide survey that collects and produces information on demographic, social, economic, and housing characteristics about the nation's population every year.

#### What was the purpose for developing this data set?

The primary purpose of the ACS is to measure the changing social and economic characteristics of the U.S. population. This information provides an important tool for communities, such as Lee County, to see how their population is changing and to make informed decisions using the best data available.

Provide the year (and optionally month, or month and day) for when the data was collected.

60 months of data collected between January 1, 2016, and December 31, 2020 (5-year estimates)

#### Briefly describe the methodology for the data collection.

In general, the annual sample size for ACS data is approximately 1-in-40 housing units (with some variation), administered as 12 independent monthly samples, and collected and organized by census geography (e.g. block group, tract, place, etc.). All geographies are summarized with data produced annually based on the accumulated responses to the previous 5 years of data collection.

Describe the total population from which the sample was taken.

The ACS data used in the Consolidated Plan was collected for Lee County as a whole, or for the Lee County Urban County grantee geography (i.e., less the cities of Cape Coral and Fort Myers) as applicable, at the census block group, tract, and place level. See also above for methodology for sample collection.

Describe the demographics of the respondents or characteristics of the unit of measure, and the number of respondents or units surveyed.

The demographics of the respondents are represented by the ACS data set. The number of respondents surveyed is unknown to the user, but the data source citation is the 2016-2020 ACS 5-year estimates (United States Census Bureau).

3 Data Source Name

FY 2023 HUD FMR and HOME Rents

List the name of the organization or individual who originated the data set.

U.S. Department of Housing and Urban Development (HUD)

#### Provide a brief summary of the data set.

FY 2023 HUD FMR and HOME Rents

#### What was the purpose for developing this data set?

Fair Market Rents (FMRs) are used to determine payment standard amounts for the Housing Choice Voucher program, to determine initial renewal rents for some expiring project-based Section 8 contracts, to determine initial rents for housing assistance payment (HAP) contracts in the Moderate Rehabilitation Single Room Occupancy program (Mod Rehab), rent ceilings for rental units in both the HOME Investment Partnerships program and the Emergency Solution Grants program, calculation of maximum award amounts for Continuum of Care recipients and the maximum amount of rent a recipient may pay for property leased with Continuum of Care funds, and calculation of flat rents in Public Housing units.

#### Provide the year (and optionally month, or month and day) for when the data was collected.

The U.S. Department of Housing and Urban Development (HUD) annually estimates FMRs for Office of Management and Budget (OMB) defined metropolitan areas, some HUD defined subdivisions of OMB metropolitan areas and each nonmetropolitan county. 42 USC 1437f requires FMRs be posted at least 30 days before they are effective and that they are effective at the start of the federal fiscal year (generally October 1).

#### Briefly describe the methodology for the data collection.

FMRs are established by HUD each year. For more information about the annual calculation of FMRs, visit HUDUSER.ORG, the website for HUD's Office of Policy Development and Research. Generally, FMRs are gross rent estimates that include rent plus the cost of all tenant-paid utilities (i.e., gross rent). FMRs are set to the dollar amount at which 40% of the standard-quality rental housing units are rented, excluding non-market rental housing (e.g. public housing). High HOME Rents are equal to the FMR or 30% of the adjusted income of a family whose income equals 65% AMI, whichever is lower. Low HOME Rents are equal to 30% of the adjusted income of a family whose income of a family whose income equals 50% AMI.

Describe the total population from which the sample was taken.

Cape Coral-Fort Myers, FL MSA. Lee County, Florida is part of the Cape Coral-Fort Myers, FL MSA, which consists of the following counties: Lee County, FL. All information here applies to the entirety of the Cape Coral-Fort Myers, FL MSA.

Describe the demographics of the respondents or characteristics of the unit of measure, and the number of respondents or units surveyed.

FMRs are calculated by HUD and updated annually using American Community Survey (ACS) data as published by the U.S. Census Bureau.