



Executive Summary

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

1. Introduction

The 2022-2023 Annual Action Plan reflects the strategies and objectives identified in the HUD Choice Neighborhood Initiative Planning Grant Plan. The Strategic Plan Titled Unlocking Goldsboro's Potential: A Transformation Plan to Guide Future Investments and Partnerships, is the by-product of a two year planning effort at a cost of \$950,000. Also known as the Goldsboro Transformation Plan. The Sanford Housing Authority (SHA) with the City of Sanford as co-applicant applied for the Choice Neighborhood Initiative Planning Grant in 2015 and was awarded a \$500,000 matching planning grant in June of 2016. SHA and the City of Sanford matched the CNI grant with \$450,000, of which the City of Sanford provided \$250,000 plus in-kind staff time. The Planning process took two years and involved 100's of citizens and The Goldsboro Transformation Plan was approved and adopted by the City of Sanford Commission June 25, 2018, and submitted to the Department of Housing and Urban Development June 28, 2018. The Plan identified high priority goals related to providing decent affordable housing opportunities through the homeowner occupied housing rehabilitation program, providing supportive services through public services grants that seek to create suitable living environment and maintain sustainability within the targeted areas. Sanford also seeks to create a suitable living environment by providing availability/accessibility to improved public facilities.

Annual Action Plans are developed to outline the programs and projects that will be funded and implemented each year to help meet the goals identified within the Five-Year Consolidated Plan (Strategic Plan). Annual accomplishments and grant expenditures are reported in an annual performance report completed at the end of each program year.

Serving as Sanford's application for Federal HUD Office of Community Planning and Development funding, The FY 2022-2023 One Year Plan identifies proposed projects and programs that will be funded by the Community Development Block Grant (CDBG). The FY 2022-2023 Action Plan was prepared with input from the public in accordance with federal regulations. The plan seeks to implement the goals and objectives of the Consolidated Plan to benefit low and moderate-income households and individuals in Sanford through provision of various improvements and services.

2. Summarize the objectives and outcomes identified in the Plan

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

Public service activities will serve very low, low and moderate-income individuals in daycare, early learning, mental health counseling, training and job retention/creation

Public facilities: assist one public facility in the Goldsboro Area to enhance accessibility to human services, health care, and or childcare/daycare to serve low and moderate-income households.

The housing program will assist up to 12 homeowners with minor home repairs.

- Accessibility for the purpose of creating suitable living environments
- Sustainability for the purpose of creating suitable living environments

Economic Development to assist up to 5 small businesses or microenterprises in the Goldsboro Neighborhood with 2022 funding.

- Accessibility for the purpose of creating economic opportunities
- Sustainability for the purpose of creating economic opportunity

3. Evaluation of past performance

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

Past performances slowed due to COVID and the Governors Executive Order to close non-essential services resulting in staff being quarantine, programs closing, and City facilities closing to the public. Programs and activities are returning to some degree of normalcy. The housing programs continued at a slower pace. The public services programs were much more active as our focus was on assisting family with food, health care and PPP supplies.

During the Program year 2020 – 2021 the City of Sanford CDBG program funded several programs through Public Services grants. The funded Non-Profit agencies provided food; reconnecting individuals with federal and state agencies acquire identification; family counseling for recovering homeless addicts; and free medical services. The program continued to process applications for minor home repair and applications from small businesses for economic development Façade improvement grants.

In addition to the CDBG program the City of Sanford received CV-1 funding in 2020 -2021 program year. The CV-1 Funds were used for a Small Business Relief Grant program that provided grants to small businesses impacted by COVID -19; Public Services Grant to Non-Profit agencies that provided either

free health care to the homeless and or low and moderate; Food; and personal hygiene care for the homeless ordered to shelter in place.

During the program year 2021 – 2022 the City of Sanford CDBG program concentrated on its housing programs, specifically the minor home repair program and reconstruction programs; and the economic development small business façade improvement program. Unfortunately, due to residual impact of COVID and the sluggish economy both programs moved very slow as housing contractors were difficult to recruit.

Also, during 2021 – 2022 the City of Sanford received a CV-3 grant. The CV-3 grant was used to provide a Mortgage Assistance and Foreclosure Prevention program; Public Services and Economic Development programs that focused on training, retraining and job retention.

4. Summary of Citizen Participation Process and consultation process

Summary from citizen participation section of plan.

A key component of the City's CDBG Citizen's Participation Process is the CDBG Advisory Board that meets monthly. The Advisory Board consisting of six (6) individuals are appointed by the City Commission. All meetings are open to public and publicly noticed. Meeting Agenda and Minutes are posted on the City website for the public. The 2022 - 2023 Action Plan was discussed at the July 12, 2022, CDBG Advisory Board meeting. Notice of the 30-day public comment period and public hearings were published in the Sanford Herald July 3-5; July 6-9 and July 10-14, 2022. The 30-day public comment period ran from Monday, July 4, 2022 - Wednesday, August 3, 2022. Two public hearings were held for community input. The first public hearing was held on Monday, July 11, 2022 at the Public Safety Complex 815 Historic Goldsboro Blvd., and the second public hearing was held on Monday, July 18, 2022 also at the Public Safety Complex. In addition, comments on the Plan was solicited from the community at the July, 28, 2022, District 2 Community meeting. The 2022-2023 CDBG Annual Action Plan was submitted to City Commission for approval at the August 8, 2022, City Commission Meeting.

5. Summary of public comments

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

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There were only two participants at the July 11, 2022, and July 18, 2022, public hearings.

Comments/questions

Does the City plan on applying for the HUD Choice Neighborhood Implementation Grant to assist with the continued development of Goldsboro?

Response: Yes, the City continues to work with the SHA to assess the opportunity to apply for an upcoming Choice Neighborhood Initiative Grant.

Why were the Public Services funding eliminated in the Substantial Amendment and will there be public services funds in the 2022 budget?

The response: The public services funding for 2021 were reallocated because the City received approval of 2021 funding in late June 2022 and the public services funds had to be spent by September 30, 2022. Due to short time frame to implement the programs, the funds were reallocated to housing rehabilitation.

Will the City continue the District 2 Economic Development grants for small businesses?

Response: Yes, the City will continue funding for economic development projects in District 2.

What will happen to economic development funds that are not spent?

Response: The Economic Development program will be revised based upon needs and demands.

Will the City increase funding for the Minor Home Repair Program?

Response: Yes. The City is working on two reconstruct projects and the cost of building materials has increased. The cost of these two projects must be covered before opening the minor home repair program.

What facilities improvements are being proposed?

Response: The City is seeking an organization to partner with to build a resource center in Goldsboro. Also, the City is negotiating with the SHA to acquire 7 acres to build- out as recreational and park space in Goldsboro.

Can CDBG funds be used to support the Goldsboro Front Porch Council Main Street Designation?

Response: Staff will contact HUD to inquire about the eligibility of the Main Street Program as an economic development activity.

Request to spread public services to several programs and not just fund one program.

Response: The CDBG Advisory Board prioritize funding multiple programs.

Can CDBG funds be used to refurbish the old theater in Goldsboro?

Response: Yes, under certain conditions. It was suggested the first step is to apply for Historic Preservation designation for the building and after the designation is secured, apply to the State of Florida Division of Historic Resources for a grant.

Can CDBG funds be used to support a business incubator in Goldsboro?

Response: Yes, CDBG funds can be used for a business incubator, Staff would have to seek T.A. from HUD for guidance.

If the Historic Goldsboro Museum move out of its present space can the Dr. Velma Williams Resource Center use the building?

Response: The decisions regarding City facilities and leases are handled by the Deputy City Manager.

Can CDBG funds be used to support programs that assist families identified through daycare that are on the brink of becoming homeless or are homeless as a result COVID?

Response: The City has COVID funds for programs that assist those experiencing homelessness as a result of COVID. Notice of Funding for COVID Public Services Funds will be published within the next month.

Can CDBG funds be used to support having Food Truck on Historic Goldsboro Blvd. a couple of times a week?

Response: Depends on what type of support you are referring to. Suggested to attend the T.A. Session for funding.

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

No comments were rejected, the questions regarding economic development, public services, housing, and facility improvement were all very relevant comments/questions and all taken seriously. There were no written comments received during the 30-day comment period.

7. Summary

The two public hearings, although there were only two participants at each hearing, the discussions were productive and worthwhile. All of the comments and questions focused on enhanced services and housing in the Goldsboro neighborhood.

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

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

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

Agency Role	Name	Department/Agency
CDBG Administrator	SANFORD	City Manager's Office, City of Sanford

Table 1 – Responsible Agencies

Narrative (optional)

The CDBG program is housed in the City Manager's Office and is one of several programs in the Community Relations and Neighborhood Engagement Unit. The Unit is managed by a director with approximately 5 staff assigned. In addition to the staff assigned to the Unit the Finance Department assigns an account manager to work with the Unit. A staff chart is attached.

Consolidated Plan Public Contact Information

City of Sanford www.sanford.fl.gov

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

1. Introduction

The 2022 Annual Action Plan continues to reflect the Goldsboro Transformation Plan with input from the CDBG Advisory Board, the Goldsboro Transformation Management Team, Sanford Housing Authority, Goldsboro Front Porch Council, and the City of Sanford. The Goldsboro Transformation Plan is the product of an open and transparent planning process involving more than 300 residents and community stakeholders and informed by lengthy face-to-face surveys of 200 community residents and former Sanford Housing Authority relocated residents. The Community came together to envision its future through seven (7) working groups that each met about 10 times; and four community-wide informational fairs that attracted over 200 residents.

The implementation of the Goldsboro Transformation Plan is an ongoing discussion in District 2. The District 2 Commissioner continues to hold once a month fourth Thursday Community meeting. The meeting provides an opportunity for community residents and City staff to engage in discussions on updates on the Transformation Plan and specific improvements in the community. In addition to City staff updates, other agencies participate in the meeting, e.g. Seminole County Public Schools, Seminole Community College, CareerSource, Florida Health Department, True Health, Seminole County Sheriff's Office, private businesses etc.

The 2022-2023 AAP continues to focus on programs and activities that further the six (6) objectives of the Goldsboro Transformation Plan e.g.

1. Empowering the Community
2. Improving Community Connections
3. Expanding Housing Opportunities
4. Invest in Our Children
5. Encourage Community Wellness
6. Expand Economic Opportunities for All

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

The Goldsboro Transformation Plan, Housing Working Group consisted of over 90 individuals, stakeholders representing residents, citizens, organizations and housing developers, health care, and legal services. The following is a partial list of private, governmental, and mental health agencies that participated in the planning process. A partial list of agencies participating includes Sanford Housing Authority, Habitat for Humanity, GoldenRule Housing Developers, Wendover Housing Developers, Corinthian Builders, Department of Health Seminole County, League of Women Voters, Community

Legal Services of Mid-Florida, Faith-based organizations, Florida Housing Coalition, ACI Architects, Rescue Outreach Mission, OTC Towing, CPH Engineering, and Harvest Time International.

The Housing Group concentrated on the strategies included in the Expanding Housing Opportunities section of the Goldsboro Transformation Plan. This Section consisted of three (3) objectives.

1. Sanford Housing Authority to develop Quality mixed-income housing on their property
2. Increased homeownership opportunities in the neighborhood
3. Improve the quality and safety of existing homes in the neighborhood

The health, mental health, and service agencies group concentrated on strategies to Encourage Community Wellness; this included leveraging partners and programs not only to influence personal health behaviors but also to affect social determinants for health to ensure residents achieve and maintain better health outcomes. This section consisted of three (3) objectives:

1. A full continuum of care including prevention, intervention, treatment, and aftercare services in Goldsboro.
2. Residents of Goldsboro have access to quality medical services to improve physical health outcomes and foster healthy lifestyles.
3. Goldsboro rich in support and amenities that promote healthy lifestyles.

Describe coordination with the Continuum of Care and efforts to address the needs of homeless persons (particularly chronically homeless individuals and families, families with children, veterans, and unaccompanied youth) and persons at risk of homelessness.

The City of Sanford will continue membership and coordination with the Central Florida Continuum of Care, Central Florida Commission on Homelessness and Homeless Services Network of Central Florida through the participation and organization of street outreach activities in the form of public events and volunteer services in order to identify and address the current needs of homeless persons residing in Sanford. Though the City of Sanford does not receive direct funding from federally funded programs such as Emergency Solutions Grant (ESG), the Seminole County Community Services Department does provide direct funding for eligible activities to the Homeless Services Network of Central Florida to administer housing and supportive services for homeless persons residing in the City of Sanford.

The City of Sanford maintains a Homeless Task Force that meets monthly to review the homeless situation in Sanford, share what services are being provided to those experiencing homelessness in Sanford and where the gaps are. The meetings allow the participants to conduct low level case management on individuals being services by several agencies and not registered in HMIS. The Task Force includes representatives from the Sanford Police Department, Seminole County Sheriff's Office, Seminole County Community Services, Homeless Services Network, Rescue Outreach Mission, Seminole

County Public School Family Intervention Team, and a number of other direct providers of services to the homeless, this includes faith-based organizations providing meals and clothing to the homeless.

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

The City of Sanford is a member of the Continuum of Care and will continue to be an active member and consult with the CoC and Homeless Services Network of Central Florida on issues addressing the needs of homeless persons in Sanford with ESG funded activities and services. The City of Sanford has a representative that sits on the Management Committee of CoC and participate in the review of proposals submitted for funding. In the event that CDBG Public Services funds are either unavailable or ineligible for use, the City advocate for funding from the CoC. Consultation efforts include participation in public events sponsored by the Homeless Services Network of Central Florida, public advocacy representation on advisory boards or committees, and continued funding opportunities to supplement homeless supportive services with housing services and outreach efforts funded by the ESG program.

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

Table 2 – Agencies, groups, organizations who participated

1	Agency/Group/Organization	Sanford Housing Authority
	Agency/Group/Organization Type	PHA
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Public Housing Needs
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	The Goldsboro CNI management team meets on a monthly bases to review progress on Goldsboro Choice Neighborhood Transformation Plan. The goal is to apply to HUD's Choice Neighborhood Initiative Program for an Implementation Grant to assist with implementing the strategies in the Goldsboro Transformation Plan. The City of Sanford meets on a quarterly bases with Habitat for Humanity to review strategies and plans for development of affordable housing in the City with a special emphasis on the Goldsboro Neighborhood. Through the donation of lots from Seminole County and the City of Sanford Habitat plans on building 10-12 affordable homes for low-income homebuyers in Sanford during the 2022 program year
2	Agency/Group/Organization	Seminole County Health Department
	Agency/Group/Organization Type	Health Agency
	What section of the Plan was addressed by Consultation?	Non-Homeless Special Needs
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	The Florida Health Department of Seminole County was a partner in t5he development of the Goldsboro Transformation and a key member of the Health Working Group and instrumental in the development of strategies and objectives for Encouraging Community wellness section of the Plan. The health continues to participate in CNI meetings and District 2 monthly Community meetings. The goal of the Community Wellness is to ensure a full continuum of care including prevention, intervention, treatment and aftercare services are available in Goldsboro to improve health, mental health and reduce substance abuse.

3	Agency/Group/Organization	FL-507 Homeless Services Network of Central Florida
	Agency/Group/Organization Type	Services-homeless
	What section of the Plan was addressed by Consultation?	Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Homelessness Strategy
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Homeless Services Network of Central Florida (HSN) is a participant in the City of Sanford Homeless services Task Force that meet monthly to review and assess the status of homeless individual's needs in Sanford, networking amongst the homeless services providers to identify what organizations are providing what Services and to whom. In addition to the Sanford Homeless Task Force Meetings, City staff consulted with HSN by phone and through the CoC as well as the PIT survey to determine City of Sanford homeless needs.
4	Agency/Group/Organization	Seminole County Community Services
	Agency/Group/Organization Type	Other government - County
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Homelessness Strategy Non-Homeless Special Needs Lead-based Paint Strategy

<p>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</p>	<p>The Seminole County Community Services Department was a participant in the Goldsboro Transformation Plan and a consultant in the development of the 2022 AAP. City consulted with the County on affordable housing and SHIP funds availability, donation of lots and funds to Habitat for Humanity for the development of affordable for-sale-low-income housing. In addition, we collaborated with Seminole County on the continuation of our House repair and reconstruction program. Also, explored the possibility of the County assisting with Sanford Housing Authority redevelopment of housing complexes in Goldsboro.</p>
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Identify any Agency Types not consulted and provide rationale for not consulting

Through the CNI working groups, CDBG Advisory Board, and District 2 monthly meetings, all agencies and organizations that provide services in District 2 are invited to the meetings to share with the community service they are providing to the community. When appropriate, City staff will follow-up with presenters at the community meeting to obtain more information on the agency’s services and how staff can be of assistance in the delivery of services to District 2.

The ongoing concern in Goldsboro is the poor quality of internet and WIFI services. Conversation continues to take place with internet service providers in collaboration with Seminole County and City of Sanford. In 2021 Seminole County arrange for an internet company to present to the residents of Goldsboro. However, after the presentation it was determined the internet and WIFI upgrades in urban areas could not be addressed through ARP funds through the County. Since the determination that Goldsboro was eligible for ARP assistance with internet and Wi-Fi there was no follow-up with internet companies.

The City of Sanford Commission and staff continues to have discussion on the digital divided in Goldsboro and looking for affordable solutions.

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

Name of Plan	Lead Organization	How do the goals of your Strategic Plan overlap with the goals of each plan?
Continuum of Care	Central Florida Commission on Homelessness	The City of Sanford is a member of the CoC, on the Board of Homeless Services Network and Central Florida Commission on Homelessness. Homeless services in Sanford is part of the Regional Plan.
Habitat for Humanity Annual Plan	Habitat for Humanity	To address the housing needs in Sanford habitat for Humanity plans to build 12 to 18 new for-sale homes for low- and moderate-income home buyers over the next 18 months

Table 3 – Other local / regional / federal planning efforts

Narrative (optional)

City of Sanford does not receive any funding for homeless services, however, the City is represented on the Board of Directors of the Homeless Services Network of Central Florida, as well as the CoC and Central Florida Commission on Homelessness.

The City of Sanford and Habitat for Humanity meet on a quarterly bases to review the housing needs, City lots available for donation and challenges Habitat is encountering from the City with building affordable housing

AP-12 Participation – 91.105, 91.200(c)

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

The Annual Action Plan is the product of an open and transparent process.

1. The CDBG advisory Board hold monthly public noticed meeting to hear from the public on the current programs and needs with in the community.
2. The City of Sanford in collaboration with the Sanford Housing Authority and Goldsboro Front Porch Council continue to meet on a regular bases to assess progress on addressing the strategies and goals contained in the Goldsboro Transformation Plan.
3. The Commissioner of District 2 convenes monthly meetings to hear from the public on needs, concerns and gaps in services in District 2, especially the Goldsboro neighborhood. All City Departments are in attendance at the meetings so all concerns, needs and issues can be addressed. These meeting have been a hallmark of District 2 for over 10 years.
4. Two Public Hearings were held July 11th & July 18th, 2022 to solicit citizen input on the Plan.

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	Minorities Persons with disabilities	6 Advisory Board members and 1 resident attended the meeting. Housing repair program will continue.	Will the housing repair program continue? There is a need for the program.	All comments are being considered.	www.sanfordfl.gov
2	Public Hearing	Minorities Persons with disabilities Non-targeted/broad community Residents of Public and Assisted Housing	2 attendees. Discussed housing program; spending public services funds; spreading public services to multiple agencies; funding for homeless families	What the plan for the future of the Goldsboro Transformation Plan; Continued funding for small businesses; Public services funds for homeless families.	All comments were acknowledged and being considered.	www.sanfordfl.gov

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
3	Public Hearing	Minorities Persons with disabilities Non-targeted/broad community Residents of Public and Assisted Housing	2 attendees. Update on housing programs; Update of economic development program for small businesses; uUsing CDBG funds for Historic preservation buildings; using CDBG funds for business; Using CDBG funds to support a Main Street Project; use of CDBG funds for acquisition of recreational space.	More funds for housing repairs; What's the plan for economic development; using funds for a business incubator; Supporting the Goldsbor Main Street Designation project.	All comments were accepted and being considered.	www.sanfordfl.gov

Table 4 – Citizen Participation Outreach

Expected Resources

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

Introduction

The implementation of the Goldsboro Transformation Plan with take 10 - 15 at an estimate cost of \$300 - 400 million. The City of Sanford has pledged the use of a substantial portion of its CDBG funds to carry out the project. The estimated cost is to address the housing, public facilities, business development, rezoning of the Goldsboro area, public transformation, and public services. The City of Sanford is actively pursuing acquiring land from Sanford Housing Authority to increase recreational facilities and space in the Goldsboro neighborhood. Also, the City is in negotiations with a national human services organization to locate a facility in Goldsboro

In addition, the Sanford Housing Authority has pledged its resources to rebuild affordable multi-family mixed income housing on the 49+ vacant acres they own in Goldsboro. Through a partnership with Wendover Housing Developers, in early 2021 the Housing Authority broken ground on Monroe Landing, a 64 unit multi-family mixed income housing unit in Goldsboro and in April of 2022 the complex opened. SHA plan to break ground on an 84 unit complex in fall of 2022.

Anticipated Resources

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
CDBG	public - federal	Acquisition Admin and Planning Economic Development Housing Public Improvements Public Services	527,636	0	0	527,636	1,055,272	This is the third year of the Con Plan, and the Plan continues with the implementation of the Goldsboro Transformation Plan.

Table 5 - Expected Resources – Priority Table

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

\$30,000 City of Sanford general fund for rezoning of Goldsboro

\$10,000 for a small business consultant to foster economic development growth in Goldsboro.

SHA seeking funds to develop 14 of the proposed 90-100 affordable for-sale single-family units on Sanford Housing Properties

The City of Sanford is in negotiations with a lead agency to build a resource center that includes a certified health clinic in Goldsboro. The estimated cost is \$3-4 million.

The Top Kids Academy, a certified daycare provider has purchased a vacant building in the Goldsboro area and plans to rehab the building into a state-of-the-art Daycare/Childcare Center. Estimated investment, \$2,000,000.00.

The City of Sanford is negotiating with the SHA for the purchase of 7.7 acres adjacent to the City-owned Dr. Velma Williams Community Center for recreational and athletic fields for the Goldsboro Community. The estimated cost of acquisition and build-out is \$3,600,000.00 plus ongoing operation costs.

The City of Sanford through the Economic Development Unit approved a \$30,000.00 grant to support the hiring of a part-time Executive Director for the Goldsboro Front Porch Council Main Street Project.

The City of Sanford Community Redevelopment Agency is implementing a pilot program with Lake Mary Shuttle to expand services to Goldsboro. At an estimated cost of \$39,720.00 for four months.

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

Sanford Housing Authority (SHA) land, approximately 7.7 acres is under negotiation for acquisition for expansion of recreation facilities in the Goldsboro neighborhood. This activity is consistent with the Goldsboro Transformation Plan: Encourage Community Wellness strategy. Expand and improve recreational facilities and programs offered to residents of Goldsboro. The City of Sanford submitted a letter of Intent (LOI) to SHA to purchase the property and presently proceeding with due diligent to complete City requirements to purchase property.

Also, under consideration is the use of City owned property to build a community resources center and certified health clinic. This proposed use of publicly owned property is consistent with the Goldsboro Transformation Plan: Objective - Encourage Community Wellness: A full continuum of care including prevention, intervention, treatment, and after care is available in Goldsboro to improvement mental health and reduce substance abuse.

The City of Sanford received a letter of Interest (LOI) from the Central Florida Urban League to purchase the property and build the Resource Center in collaboration with a nationally accredited health center.

Discussion

Acquisition of SHA property that is adjacent to the City's Westside Community Center for athletic fields, some in the community feel strongly the land should be used for additional housing. Also, the building of a neighborhood resource center on City owned land in Goldsboro, with supportive services supports the goals, objectives and strategies contained in the Goldsboro Transformation Plan.

Annual Goals and Objectives

AP-20 Annual Goals and Objectives

Goals Summary Information

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
1	Homeowner Occupied Housing Rehabilitation	2020	2024	Affordable Housing	Goldsboro Georgetown District Two	Homeowner Occupied Housing Rehabilitation	CDBG: \$254,146	Homeowner Housing Rehabilitated: 10 Household Housing Unit
3	Public Services	2020	2024	Non-Housing Community Development	Goldsboro Georgetown District Two	Public Services	CDBG: \$79,145	Public service activities for Low/Moderate Income Housing Benefit: 200 Households Assisted
4	Public Facilities	2020	2024	Non-Housing Community Development	Goldsboro	Public Facilities	CDBG: \$88,818	Public Facility or Infrastructure Activities for Low/Moderate Income Housing Benefit: 250 Households Assisted
5	Administration	2020	2024	Administration	Goldsboro Georgetown District Two	Administration	CDBG: \$105,527	Other: 1 Other

Table 6 – Goals Summary

Goal Descriptions

1	Goal Name	Homeowner Occupied Housing Rehabilitation
	Goal Description	Owner occupied Housing repair and Rehabilitation programs will assist 10 Household Housing Unit
3	Goal Name	Public Services
	Goal Description	Public service that supports community wellness, programs that invest in the children, programs that empower the community and public safety and educational and leadership development training
4	Goal Name	Public Facilities
	Goal Description	Public Facility or Infrastructure Activities for Low/Moderate Income Housing Benefit: 250 Households Assisted
5	Goal Name	Administration
	Goal Description	Administration and planning for the implementation of the CDBG program.

Projects

AP-35 Projects – 91.220(d)

Introduction

The funding priorities for 2022 - 2023 are consistent with the Strategies in the Goldsboro Transformation Plan. Specifically, programs like Economic Development activities to support new and existing businesses encouraging economic development and growth. Housing activities to ensure residents have access to quality and safe housing. Also, opportunity for homeownership to increase in the neighborhood

Projects

#	Project Name
1	2021 Public Services
2	2021 Public Facilities
3	2022 Administration and Planning
4	2022 Housing Rehabilitation/Reconstruction

Table 7 - Project Information

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

The funding priorities are consistent with the Strategies in the Goldsboro Transformation Plan. The main obstacles to addressing the underserved needs is adequate funding. The City in partnership with Sanford Housing Authority (SHA) will continue to pursue a HUD Choice Neighborhood Initiative Implementation grant to accelerate the implementation of the Plan. Also, the partnership will continue to seek other partners to invest in the area. Potential investment partners include Seminole County, Seminole County Public Schools, Seminole County Sheriff's Office, Seminole Community College, Florida Health Department of Seminole County and True Heath.

The major obstacles to addressing the underserved needs in Goldsboro is financial resources. The City of Sanford in partnership with SHA will continue to pursue the HUD Choice Neighborhood Initiative Implementation Grant.

AP-38 Project Summary
Project Summary Information

1	Project Name	2021 Public Services
	Target Area	Goldsboro Georgetown
	Goals Supported	Public Services
	Needs Addressed	Public Services
	Funding	CDBG: \$79,145
	Description	Services to include education programs, mentoring programs, public safety, programs for youth, senior, counseling, and wellness programs
	Target Date	
	Estimate the number and type of families that will benefit from the proposed activities	
	Location Description	
	Planned Activities	Funding of activities that invest in the children, alternative education programs, mentoring programs, public safety and second chance programs for youth, employment and development, early learning, counseling, and wellness program
2	Project Name	2021 Public Facilities
	Target Area	Goldsboro
	Goals Supported	Public Facilities
	Needs Addressed	Public Facilities
	Funding	CDBG: \$88,818
	Description	Improve infrastructure in the City of Sanford
	Target Date	
	Estimate the number and type of families that will benefit from the proposed activities	
	Location Description	
	Planned Activities	Assist with improving and increasing public services facilities in Goldsboro and/or improving infrastructure and internet and WiFi connections.

3	Project Name	2022 Administration and Planning
	Target Area	Goldsboro Georgetown District Two
	Goals Supported	Administration
	Needs Addressed	Administration
	Funding	CDBG: \$105,527
	Description	The City of Sanford has allocated \$105,527.00 (Maximum 20% allowable) in CDBG funding to implement administration activities to achieve the goals and objectives set forth in the 2020-2024 Consolidated Plan and the 2022-2023 Annual Action Plan.
	Target Date	
	Estimate the number and type of families that will benefit from the proposed activities	
	Location Description	
Planned Activities	Administration of activities to include staff salaries, advertising, communication, consulting services, etc.	
4	Project Name	2022 Housing Rehabilitation/Reconstruction
	Target Area	Goldsboro Georgetown District Two
	Goals Supported	Homeowner Occupied Housing Rehabilitation
	Needs Addressed	Homeowner Occupied Housing Rehabilitation
	Funding	CDBG: \$254,146
	Description	The City of Sanford has allocated \$254,146.00 towards housing rehabilitation activities through the Home Minor Repair, and major rehabilitation and reconstruction programs.
	Target Date	
	Estimate the number and type of families that will benefit from the proposed activities	

	Location Description	
	Planned Activities	Housing rehabilitation activities to include minor home repairs/replacement, e.g electrical, plumbing, roof, HVAC, and accessibility.

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

Funds will be spent in District 2 where the majority of the low-income households exist, the oldest houses stock, poor infrastructure, poor broadband connections, and highest unemployment rate.

Geographic Distribution

Target Area	Percentage of Funds
Goldsboro	80
Georgetown	10
District Two	10

Table 8 - Geographic Distribution

Rationale for the priorities for allocating investments geographically

Goldsboro has been and continues to be the most distressed area in the City of Sanford with the highest unemployment rate, lowest household income, and oldest housing stock. Poor infrastructure and poor internet and WIFI services. Goldsboro was a thriving African American community at the turn of the 19th century, however, over the years due to a lack of investment the neighborhood has suffered and deteriorated. The lowest income per households' blocks is in Goldsboro, reporting households with income of less than \$10,000 per year. The City of Sanford has made considerable investments in the Goldsboro community over the past several years, there is still a need for much more to be done

Discussion

Goldsboro is the home of 380 of the 480 public housing units demolished in 2012. Thanks to the HUD Choice Neighborhood Planning grant a strategic plan has been developed to unlock the potential for the neighborhood and guide future investments and development in Goldsboro. The City of Sanford and the Sanford Housing Authority adopted the Plan in 2018 and has moved forward with implementing the strategies, goals, and objectives of Plan.

During the past year 2021 the Goldsboro Front Porch Council partnered with the Sanford Chamber of Commerce, the Sanford Downtown Main Street program, and the City of Sanford Economic development Office and successfully submitted a proposal to the State of Florida Main Street Program and was awarded the Main Street Designation. This designation should be extremely helpful with revitalizing economic development growth for Goldsboro.

Completing the rezoning for the Goldsboro Neighborhood to support the expansion of a commercial and business district. Also, improving the internet and WIFI services in the Goldsboro Neighborhood.

Affordable Housing

AP-55 Affordable Housing – 91.220(g)

Introduction

For 2022 the City of Sanford has allocated funding for affordable housing through the minor home repair, rehabilitation and reconstruction program for owner occupied house. In future years funds will be allocated to support the development of affordable new construction of for-sale single family homes. The City of Sanford will continue to work with Sanford Housing Authority to develop, 90 – 100 new affordable for-sale single family homes in Goldsboro. Also, the City of Sanford will continue to work with Habitat for Humanity and Harvest Time International to build 20 -25 affordable single- family homes for low-income home buyers.

One Year Goals for the Number of Households to be Supported	
Homeless	0
Non-Homeless	10
Special-Needs	0
Total	10

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

One Year Goals for the Number of Households Supported Through	
Rental Assistance	0
The Production of New Units	0
Rehab of Existing Units	10
Acquisition of Existing Units	0
Total	10

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

Discussion

In 2022 the City of Sanford is concentrating on minor home repairs to assist low-income homeowner with mechanical and accessibility needs. Also, the City of Sanford will operate housing programs that provide major rehabilitation and reconstruction of owner-occupied house with major repairs needs.

Currently the City of Sanford CDBG program is completing two demo-reconstruction projects that has been delayed and impacted by cost increase in housing materials. The housing materials cost increase has resulted in the cost of the two units more than doubling and resulting in the projects being carried into the 2022 program year as well as the 2022 budget.

AP-60 Public Housing – 91.220(h)

Introduction

The City of Sanford in Partnership with the Sanford Housing Authority and the Goldsboro Front Porch Council collaborated on the development of the Goldsboro Transformation Plan. The three entities continue to partner on moving forward with implementing the Plan for the Goldsboro Community. Goldsboro was the home of 380 of the 480 Public housing units demolished in 2012.

In 2021 The Sanford Housing Authority (SHA) in partnership the Wendover Housing has broken ground on the redevelopment of a 64-unit multi- family mixed income housing unit in the Goldsboro area (Monroe Landing). April of 2022 Monroe Landing ribbon cutting ceremony was held and the complex officially opened. Late 2022 SHA and Wendover Housing Developers is scheduled to break ground on Phase II of Monroe Landing, an 84-unit multi-family mixed income complex.

SHA and Wendover Housing Developers have applied for Low Income Tax Credits for the development of one more 100-unit multi-family mixed income housing complex in Goldsboro.

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

The City will continue to work with the Housing authority to seek a HUD Choice Neighborhood Implementation grant for Goldsboro.

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

In partnership with the Sanford Housing Authority, Habitat for Humanity and Seminole County Community Services Department HOME and SHIP program, the City of Sanford will actively promote homeownership for public housing residents and seek funding to assist with down payments and etc.

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

Sanford Housing Authority is not designated as troubled

Discussion

Through partnerships with Seminole County, housing developers and SHA the City of Sanford will strongly promote, advocate, and strive to take steps to increase the inventory of affordable housing. Also, the City of Sanford will continue to work with SHA to apply to HUD for a Choice Neighborhood Initiative Implementation grant for the Goldsboro Transformation Plan

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

Introduction

As noted in the 5 Year Consolidated Plan the City of Sanford does not receive direct funding for the homeless and therefore relies heavily upon Seminole County Community Services Department, Homeless Services Network, and non-profits to achieve the goals and objectives noted in our 2020-2024 Consolidated Plan.

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

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

The City of Sanford has limited funding to devote to homeless services, however our housing rehabilitation program provide repairs that in some cases can and do prevent homelessness, by improving substandard housing conditions. The City of Sanford participates in the Continuum of Care and maintains a Homeless Task Force.

Addressing the emergency shelter and transitional housing needs of homeless persons

The City of Sanford collaborates with the Homeless Services Network (HSN) Rescue Outreach Mission, Recovery House of Central Florida, and Central Florida Commission on Homelessness and other agencies to foster emergency housing services for the homeless.

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

Due to a lack of funding, the City of Sanford does not administer any internal programs or services that provide a direct benefit to homeless persons. City of Sanford in partnership with Seminole County, local Non-Profit homeless services providers funded with ESG through Seminole County and Homeless Services Network address the needs of the homeless in the City of Sanford. With the addition of CARES funding to the City of Sanford grants have been awarded to some of the Non-Profits providers of homeless services thus increasing their services in Sanford.

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.

Due to a lack of funding, the City of Sanford does not administer any internal programs or services that provide a direct benefit to homeless persons. City of Sanford in partnership with Seminole County, local Non-Profit homeless services providers funded with ESG through Seminole County and Homeless Services Network address the needs of the homeless in the City of Sanford. With the addition of CARES funding the direct providers of homeless services have increased services in Sanford.

Discussion

Although the City of Sanford does not receive direct funding for homeless services, the City of Sanford actively collaborate with the recipients of direct funding to advocate for services for the homeless to improve their quality of life. The City of Sanford works with Seminole County, and Homeless Services Network to meet the needs of homeless families and individuals in Sanford.

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

Introduction:

The City of Sanford has taken a couple of measures to address the barriers to affordable.

1. The City of Sanford has appointed a committee to review and suggest strategies to assist with affordable housing. The committee's creation evolved from numerous requests to the City of Sanford for consideration of reducing and or deferring impact fees for affordable housing. In response to changes in Florida Statue 163.31801 Impact Fees, the committee is charged with proposing a program to waive or delay payment of impact fees for affordable housing. The City of Sanford also donate lots to Habitat for Humanity and other Non-Profit housing developers to build affordable housing for low-income homeowners
2. The City has commissioned a study to rezone the Goldsboro neighborhood to include a commercial zone to offset taxes.

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

The City of Sanford has taken a couple of measures to address the barriers to affordable housing.

1. The City of Sanford has appointed a committee to review and suggest strategies to assist with affordable housing. The committee creation evolved from numerous requests to the City of Sanford for consideration of reducing or waiving impact fees for affordable housing. The committee looking into a program to waive or delay payment of impact fees for affordable housing. The City of Sanford also donate lots to Habitat for Humanity and other Non-Profit housing developers to build affordable housing for low-income homeowners
2. The City has commissioned a study to rezone the Goldsboro neighborhood to include a commercial zone to offset taxes.
3. The development of a cottage home program for irregular lots. The designs of the units are free to perspective home builders.
4. The development of shelf-ready designs/drawings for 2, 3, and 4 bedroom free to perspective affordable housing home builders.

Discussion:

What should be done to support affordable housing in addition to reducing/waiving impact fees? Is there funding from the State or Federal government to support affordable housing.

AP-85 Other Actions – 91.220(k)

Introduction:

The City of Sanford is committed to implementing the Strategies, Goals and Objectives in the Goldsboro Transformation Plan. The City of Sanford committed to the use of CDBG funds to support the implementation of the Plan and fully intent to continue the partnership with the Sanford Housing Authority and Goldsboro Front Porch Council to realize the potential of Goldsboro and transform Goldsboro to a vibrant thriving community.

Actions planned to address obstacles to meeting underserved needs

The Goldsboro Transformation Plan consist of three parts: People, Neighborhood and Community. The City has committed to continuing to implement the strategies in the Transformation Plan and has committed general funds to complete the rezoning of Goldsboro to comply with the recommendations in Plan. Also, the City of Sanford has retained a Small Business Consultant to work with the CDBG program and the City's Economic Development Department to foster growth and development for new and existing businesses in District 2.

In addition, the City of Sanford has committed funding to the Goldsboro Front Porch Council Main Street program to hire an Executive Director to drive economic development growth in Goldsboro. Finally, the City of Sanford is negotiating with Sanford Housing Authority to acquire 7+ acres in Goldsboro for recreational athletic fields.

Actions planned to foster and maintain affordable housing

The City of Sanford will continue to work with Sanford Housing Authority to ensure the redevelopment of the 480 units demolished.

The City will establish an impact fee waiver/delayed payment program for affordable housing development.

The City of Sanford will continue to identify and donate lots to Non-Profit housing developers for development of affordable housing for low-income homebuyers.

The City of Sanford completed and made available the cottage home program that provide free house designs for irregular lots.

Actions planned to reduce lead-based paint hazards

All affordable housing projects, funded by the City of Sanford will be conducted in accordance with the adopted Seminole County Lead Based Paint (LBP) identification and abatement standards. Seminole County requires that all contractors complete a detailed work write-up to document a lead-based paint

hazard risk prior to reconstruction on any housing activity:

- If the building was constructed in 1978 or after, the construction date of the unit and source of information is to be recorded on the form.
- If the building was constructed before 1978, it requires visual inspection unless one of the following apply:

a) No children under the age of 6 reside in the home.

b) A previous lead-based paint inspection has been conducted according to the HUD regulations and the unit was found not to have lead-based paint, documentation must be attached.

c) The property has identified, and all lead-based paint has been removed in accordance to HUD regulations. Documentation must be attached.

- If the building was constructed before 1978 and does not meet any of the exemptions above, the following actions must be taken:

a) A brochure concerning lead-based paint hazards is to be provided to the household.

b) The client is to be provided with a Disclosure of Information on Lead Based Paint

c) The home must be visually inspected. The preparer must, at a minimum, complete HUD's online visual inspection training before the inspection is conducted. The inspecting party must answer the following questions:

- Are interior painted surfaces free from deteriorated paint?
- Are the exterior painted surfaces free from deteriorated paint?
- Will any paint be disturbed during rehabilitation?

In accordance with the HUD Lead-Based Paint Regulation (24 CFR Part 35), rehabilitation work on housing built before 1978 that is financially assisted by the Federal government is subject to requirements that will control lead-based paint hazards. At the very least, the City of Sanford will test and repair any painted surface that is disturbed during the work. The City of Sanford may stabilize deteriorated paint, which includes the correction of moisture leaks or other obvious causes of paint deterioration. Clearance examination will be conducted following most work activities to ensure that the work has been completed; that dust, paint chips and other debris have been satisfactorily cleaned up; and that dust lead hazards are not left behind. As necessary, a risk assessment will be done to identify lead-based paint hazards, perform interim control measures to eliminate any hazards that are identified or, in lieu of a risk assessment, perform standard treatments throughout a unit. The type and amount of Federal assistance and rehabilitation hard costs for the unit will determine the level of lead hazard reduction that will be completed.

Actions to address LBP hazards and increase access to housing without lead based paint hazards include:

- Ensure contractors completing work write-up on housing units are certified to complete the proper testing
- When selecting homes for rehabilitation/resale, give priority to homes that were constructed after 1978
- Coordinate with the local health department to maintain statistics on housing units identified to contain lead-based paint

Actions planned to reduce the number of poverty-level families

The University Of Central Florida Department Of Public Administration, in partnership with the Seminole County Health Department, completed a detailed analysis of the characteristics of distressed neighborhoods in the City of Sanford. The City of Sanford is currently in the process of implementing actions to alleviate the poverty in the identified neighborhoods. Some examples of actions being taken to reduce the number of poverty-level families include:

- Providing job training to youth and unemployed
- Working with the Sanford Housing Authority for planning future housing development for very low and low-income families who suffered from the loss of existing public housing in 2011
- Working with the local Chamber of Commerce to discuss potential opportunities for economic growth throughout these neighborhoods
- Through the collaboration with the Sanford Chamber of Commerce the Goldsboro Front Porch Council, Inc. has received the designation of a Main Street project.
- Working with Habitat for Humanity to design a "Fix-up" program
- The City of Sanford has been designated a "My Brother's Keeper" Community targeting services for young men of color.

The City of Sanford has placed a priority on youth services, particularly those that provide mentoring and employment skills training and leadership development.

Referral services to programs that promote employment, and skills training for individuals and households in poverty.

Actions planned to develop institutional structure

The Goldsboro Transformation Plan is very thorough Plan of needs in the Goldsboro Neighborhood and included participation from a variety of institutional organizations and agencies in the planning process. Those organizations and agencies continue to work in the Goldsboro area providing services. A good example of a partnership is Habitat for Humanity a member of the Transformation Planning process has committed to building 15-20 affordable for-sale single family house in the Goldsboro

neighborhood over the next 18 months for low-income homebuyers.

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

The Goldsboro Transformation planning groups continues to meet and assess progress made and challenges that need to be addressed. Also, the Commissioner of District continue to conduct his monthly meetings that include the County Community Services, Seminole County Public Schools, Health Department of Seminole County, etc.

Discussion:

The many housings, public services and infrastructure needs of Goldsboro is an ongoing concern for the City of Sanford and addressed on an ongoing basis.

Program Specific Requirements

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

Introduction:

This component examines the amount of program income anticipated to be received prior to the start of the next fiscal year from activities and projects currently being implemented from previous CDBG funding allocations. It also addresses whether any urgent need activities are expected to be implemented with 2022 - 2023 CDBG funding and the amount of funding that will benefit low- to moderate-income persons/families. The City of Sanford Affirm it has no program income.

Community Development Block Grant Program (CDBG)

Reference 24 CFR 91.220(I)(1)

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

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

Other CDBG Requirements

1. The amount of urgent need activities	0
2. The estimated percentage of CDBG funds that will be used for activities that benefit persons of low and moderate income. Overall Benefit - A consecutive period of one, two or three years may be used to determine that a minimum overall benefit of 70% of CDBG funds is used to benefit persons of low and moderate income. Specify the years covered that include this Annual Action Plan.	100.00%

The City of Sanford certifies it has elected an overall benefit of one year to expend its CDBG funding to principally benefit low and moderate-income persons in a way that ensures at least 70% of the amount is expended for activities that benefit such persons in the 2022 program year. Sanford seeks to use all of its funding to benefit low- and moderate-income persons.

