



First Program Year Action Plan – Revision 1

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

Narrative Responses

GENERAL

Executive Summary

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

Program Year 1 Action Plan Executive Summary:

In the past, the City of Venice's Community Development Block Grant (CDBG) funds were maintained by the Sarasota Consortium. This is the first year the City of Venice is a CDBG entitlement entity, therefore past performance cannot be evaluated in this plan.

The City of Venice is the lead agency for administering CDBG funds and will oversee the development and implementation of the Consolidated Plan for that purpose. The City of Venice has an interlocal agreement with Sarasota County/City of Sarasota and will continue to partner with the Sarasota Consortium for ESG and HOPWA funding. The city does not qualify for HOME funds and the City of Sarasota will not be providing HOME funds to Venice residents during fiscal year 2008/2009. State Housing Initiative Partnership ([SHIP](#)) funds will be maintained by the Sarasota Consortium during 2008 and 2009. ~~and the city expects to administer SHIP funds starting 2009.~~

The City of Venice will continue to work with the Sarasota Consortium, local agencies and non-profits to meet and accomplish the community needs for providing and sustaining decent housing for low and moderate income residents, maintain a suitable living environment, and expand economic opportunities for low and moderate income persons.

Objectives for this year include:

Homeownership:

- Sarasota Consortium and non-profit organizations will continue to assist low and moderate income down payment assistance, homebuyer education, impact fee assistance, and affordable housing.

- Royal Venice provides assistance to low income homeowners who are facing foreclosures.
- ~~Form an Affordable Housing Advisory Committee to assist in future compilation of the Consolidated Plan and assist in goals and objectives for the SHIP program.~~

Rental Activities:

- The city will continue to partner with the Sarasota Consortium who will provide affordable rental units for low and moderate income residents. This includes tenant based assistance.

Special Needs:

- The city will participate with the Sarasota Consortium to address the elderly, those with addiction problems, HIV/AIDS victims, and disabled low income residents.
- The city will set aside \$5,000 of annual funds for local food banks and home food delivery for the elderly.

Homelessness Strategies:

- The city will participate with the local Continuum of Care (COC) group who assists homeless individuals throughout the community. The Sarasota Consortium gives \$500,000 to the COC to assist 25 low income families to end or prevent homelessness.

Infrastructure:

- ~~Flood protection improvements are needed in the Airport Census Tract.~~
- Water, sewer, stormwater and electrical infrastructure design and permitting for the phase 1 of the housing authority redevelopment.

General Questions

1. Describe the geographic areas of the jurisdiction (including areas of low income families and/or racial/minority concentration) in which assistance will be directed during the next year. Where appropriate, the jurisdiction should estimate the percentage of funds the jurisdiction plans to dedicate to target areas.
2. Describe the basis for allocating investments geographically within the jurisdiction (or within the EMSA for HOPWA) (91.215(a)(1)) during the next year and the rationale for assigning the priorities.
3. Describe actions that will take place during the next year to address obstacles to meeting underserved needs.

4. Identify the federal, state, and local resources expected to be made available to address the needs identified in the plan. Federal resources should include Section 8 funds made available to the jurisdiction, Low-Income Housing Tax Credits, and competitive McKinney-Vento Homeless Assistance Act funds expected to be available to address priority needs and specific objectives identified in the strategic plan.

Program Year 1 Action Plan General Questions response:

The city will not receive HOME investment Partnership program, State Housing Initiatives Partnership (SHIP), public housing capital funding, public housing operational funding, Section 8 voucher funding, Continuum of Care funding, Emergency Shelter Grant (ESG) and Housing Opportunities for Persons with AIDS (HOPWA) funding. As a result, the city will continue to participate in the interlocal agreement with the Sarasota Consortium for the distribution of their funds. The city will take over SHIP funds in 2009.

The city estimates that during this year, CDBG funds will be distributed as follows: (\$90,000 total)

~~Airport Census Tract Venice Housing Authority~~ 75% of funding - \$67,000 (~~2~~ 3 year program)
 Administration 20% of funding - \$18,000
 \$5,000 (5%) will be set aside to assist food banks and transported meals.

~~The Airport Census Tract is in an area that is 60% LMI according to 2000 US Census information. All funding will be used to benefit low to moderate income individuals and families. Since this is the first program year, program income and carry over funds are not applicable to the budget.~~

City Council met on May 27, 2008 and assigned the priorities. The Venice Housing Authority was ranked as the highest priority, but funding will not be needed until Program Year 3. The Housing Authority is currently relocating residents, locating funding sources, and preparing to develop a master campus plan.

On April 28, 2009, city staff met with the housing authority. It was determined that they needed their funds sooner. This Action Plan is being revised to adjust the funds for Venice Housing Authority for this year. The funds will be used for infrastructure design and construction. Infrastructure covered under this activity is limited to: stormwater improvements, water and sewer utility improvements, electrical improvements (for street lighting) and sidewalk or street improvements strictly for the use of the housing authority.

The city does not have funding available for affordable housing units; therefore table 3B, "Annual Housing Completion Goals" is not included in this report.

The following priorities will be addressed in fiscal 2008/2009 with CDBG funds:

Special Needs

Need	1
Priority	1: Because of the city's elderly population, special needs are ranked second for need.
Strategy	Assist meal transportation services who serve low income

	elderly and the disabled.
Obstacles	Limited amounts of funding.
Resources	CDBG funds, non-profit agencies.
Funding	\$25,000 over five years (shared with Homelessness Need 4/Priority 1)
Time Period	5 years – At least 250 people served over 5 years.

Homelessness

Need	1
Priority	1: Homelessness was ranked last based on input from special needs groups and on homelessness estimates.
Strategy	Continue to work under the Sarasota Consortium interlocal agreement that assists with homelessness activities for low income. The city will set aside funds for homeless public services.
Obstacles	Very limited amounts of funding available.
Resources	Sarasota County Coalition for the Homeless, Continuum of Care, Fishers of Men Bible Church.
Funding	\$25,000 over 5 years (shared with Special Needs Need 2/Priority 1)
Time Period	5 years – At least 250 people served over 5 years.

Neighborhood Improvements

Need	2
Priority	2: Reduce flooding in the Airport Census Tract
Strategy	Provide engineering and construction services to an area that needs stormwater modifications to reduce the risk of flooding.
Obstacles	None.
Resources	City of Venice
Funding	\$134,000 CDBG over 2 years
Time Period	2 years – Approximately 30 households will benefit.

Need	1
Priority	1: Affordable housing was ranked the highest priority by service providers and city council to address the troubled Venice Housing Authority.
Strategy	The Venice Housing Authority is working to create a master plan for a new housing authority. The city will set aside funds from CDBG to help with infrastructure.
Obstacles	Limited amounts of funding, "not in my backyard" views, may be limits on how the property can be developed.
Resources	Venice Housing Authority, various non-profit organizations. The city will provide CDBG funds to assist with stormwater, infrastructure, lighting and/or sidewalks.
Funding	CDBG \$201,000 over a three year period, and \$22,055.40 from CDBG-R
Time Period	3 years – 50 low income households to benefit.

Affordable Housing

Need	2
Priority	2: Affordable housing was ranked the highest priority by service providers and city council.
Strategy	Strategy Local non-profit agencies are working to provide affordable and workforce housing in the city. Projects such as the proposed "Bridges" development will provide affordable workforce housing
Obstacles	Obstacles Limited amounts of funding, "not in my backyard" views, may be limits on how the property can be developed.
Resources	Resources Habitat for Humanity, Gulf Coast Community Foundation of Venice, other local non-profit agencies.
Funding	Funding Overseen and funded by local non-profit agencies.
Time Period	Ongoing.

Managing the Process

1. Identify the lead agency, entity, and agencies responsible for administering programs covered by the consolidated plan.
2. Identify the significant aspects of the process by which the plan was developed, and the agencies, groups, organizations, and others who participated in the process.
3. Describe actions that will take place during the next year to enhance coordination between public and private housing, health, and social service agencies.

Program Year 1 Action Plan Managing the Process response:

The City of Venice is the lead agency responsible for the Consolidated Plan. Development Services has taken the lead in preparing workshops, public hearings, and in preparing the Consolidated Plan.

The City of Sarasota is the recipient of HOPWA, HOME and SHIP funds and the City of Venice participates in an interlocal agreement for them to oversee and administer those programs on behalf of the city and the rest of Sarasota County. Starting in 2009, Venice will administer the SHIP program.

The Suncoast Partnership to End Homelessness, Inc. is the provider of the Continuum of Care for all of Sarasota County.

The plan writing process began in January 2008 with Development Services meeting with fellow staff members, and phone conferences and meetings with the City of Sarasota Office of Community and Housing Development and HUD. In March 2008, the city began contacting service providers for data and information about low and moderate income needs and homeless needs. In April 2008, a public workshop was held with local agencies, non-profit organizations, and other area service providers. A questionnaire was also sent to local service providers. Members who provided input into this plan include:

- Ed Martin, Mayor City of Venice

- John Moore, City of Venice Council Member
- John Simmonds, City of Venice Council Member
- Rick Tacy, City of Venice Council Member
- Vicki Noren, City of Venice Council Member
- Ernest Zavodnyik, City of Venice Council Member
- Sue Lang, City of Venice Council Member
- Martha Thomas, Venice Housing Authority
- Kent Macci, Sarasota County Health Department, Environmental Hazards
- Christine Davis, Office of Housing and Community Development Sarasota Consortium
- Donald Hadsell, Office of Housing and Community Development Sarasota Consortium
- Olivia Thomas, Safe Place and Rape Crisis Center (SPARCC)
- Martin Black, Former City of Venice City Manager
- Isaac Turner, City of Venice City Manager
- Nancy Woodley, Ph.D., P.E., City of Venice General Manager of Development Services
- Tom Slaughter, AICP, City of Venice Planning Director
- Don Caillouette, City of Venice Comprehensive Planning
- Dave Dunaway, Police Captain
- Spencer Edwards, Health Planning Council of Southwest Florida, Inc.
- Yvonne Heckler, Habitat for Humanity
- Brian Meurs, Community Housing Trust of Sarasota County, Inc.
- George Barr, Venice Housing Authority
- Lynette McClelland, Fishers of Men Bible Church
- Judith Wilcox, Habitat for Humanity
- Ellen McLaughlin, YMCA Schoolhouse Link
- George Aristizabal, Royal Venice
- Kirstin Fulkerson, Gulf Coast Community Foundation of Venice
- Don O'Connell, Royal Venice
- Tangelia Lane, Safe Place and Rape Crisis Center (SPARCC)
- Phillip Brooks, First Step of Sarasota
- Michael Rose, Venice Police Department
- Patti Murphy, Goodwill Manasota
- Ron Solanes, Venice Police Department
- Kevin McGrath, Venice Police Department
- Eric Hill, Venice Police Department
- T.R. Crepeau, Venice Police Department
- Jason Adams, Venice Police Department
- Donna Leclerc, DASH, Inc.
- Richard Martin, Suncoast Partnership to End Homelessness, Inc.
- Benjamin Bell, MDStrum Housing Services, Inc. (HUD/VHA)

City Council met on May 27, 2008 to review comments from questionnaires and the service provider workshop. A motion was made to set aside funds for infrastructure improvements to benefit the Venice Housing Authority, local food pantries, and public improvements in the Airport Census tract.

The Consolidated Plan is to be carried out through a combination of public, private, and non-profit organizations, many who participated in the public workshop in April 2008, and through the Sarasota Consortium. The partnerships are vital to carrying out the strategies listed in the Consolidated Plan since the city is only receiving CDBG funds and has a limited amount to spend on activities. The Sarasota

Consortium is a very important entity for carrying out many of the goals within the city's jurisdiction. The city will participate with the Sarasota Consortium and attend meetings related to the Continuum of Care, HOPWA and the Consortium.

Citizen Participation

1. Provide a summary of the citizen participation process.
2. Provide a summary of citizen comments or views on the plan.
3. Provide a summary of efforts made to broaden public participation in the development of the consolidated plan, including outreach to minorities and non-English speaking persons, as well as persons with disabilities.
4. Provide a written explanation of comments not accepted and the reasons why these comments were not accepted.

*Please note that Citizen Comments and Responses may be included as additional files within the CPMP Tool.

Program Year 1 Action Plan Citizen Participation response:

The City of Venice adopted a Citizen Participation Plan on April 22, 2008. This plan outlines the steps to obtain public comment on the Consolidated Plan, Action Plans and Performance Reports.

The public hearing on the Consolidated Plan and Year One Action Plan was held on July 22, 2008. No comments were received.

This is the first year the City of Venice is entitled to receive CDBG funds. One workshop, one public hearing, and one public meeting were held for the draft Consolidated Plan and Year One Action Plan. If this plan is accepted by HUD, the city will be holding two public hearings a year as outlined in the Citizen Participation Plan; one for the Action Plan, and one for the Performance Report.

Notices about the availability of the Consolidated Plan/Year One Action Plan and public hearing were announced in the Venice Gondolier on June 22, 2008. The draft Consolidated Plan was also emailed to the local service providers who attended the public workshop and submitted completed questionnaires. We encourage the service providers to share this document with others. Also copies of the Consolidated Plan are available at City Hall and the Venice Public Library.

[Revision one of the Action Plan was publicized on May 16, 2009 and was available at City Hall, online on the city's web site, and at the Venice Public Library. The public hearing was held on June 23, 2009. No comments were received.](#)

For non-English speaking residents and residents with disabilities, accommodations can be made with 24 hour notice to the City Clerks Office.

Institutional Structure

1. Describe actions that will take place during the next year to develop institutional structure.

Program Year 1 Action Plan Institutional Structure response:

The Sarasota Consortium and numerous non-profit organizations that deliver public services provide an invaluable service to improving the lives of the citizens of Venice. The city's existing partnerships continue to be valuable and productive. It is the city's intent to continue working with Sarasota Consortium and its partners while strengthening these relationships. Any gaps that may arise in program delivery may be overcome by the variety of available partners.

Monitoring

1. Describe actions that will take place during the next year to monitor its housing and community development projects and ensure long-term compliance with program requirements and comprehensive planning requirements.

Program Year 1 Action Plan Monitoring response:

The City of Sarasota will be administering CDBG funds for the City of Venice, but we have established standards and procedures in order to monitor activities authorized under federal programs and to ensure long-term compliance with the provisions of those programs. As a method for checking progress, the standards and procedures will serve to measure resources consumed, track the status of projects, measure and compare accomplishments with projections, and provide methods for change and/or improvement, where needed.

The city will monitor its performance set forth in the Consolidated Plan and the Annual Action Plans. This includes steps and actions being taken to ensure compliance with program requirements involving timeliness of expenditures. Projects receiving program assistance are monitored to ensure on-going compliance with program requirements. The city's Finance Department will provide ongoing fiscal monitoring of each project receiving CDBG funds. Development Services will provide on site monitoring. In addition, the city will conduct monitoring of CDBG funded construction projects for labor standards compliance related to Davis-Bacon regulations and environmental assessments.

Monitoring efforts to address timeliness of expenditures require accurate internal and external tracking and reporting systems. Monthly draw down of funds will be recorded in the IDIS system to track the expenditure rate and the progress of project activities. This data is also used during preparation of the annual year-end report.

The following are other monitoring methodology utilized by the city for all funds:

- Yearly internal auditing completed by the Finance Department.
- External auditing of both federal and state funds completed by an independent auditing firm for all grant funds received by the city.
- Tracking software used for federal and state funds in place.
- Annual reports submitted for federal and state programs.
- Monthly reconciliation of funds for both federal and state programs.
- Drawdown completed jointly by the CDBG staff and Finance Department staff.
- Desk monitoring conducted monthly with each drawdown request.

Monitoring the Consolidated Plan is an ongoing process to ensure that the city is meeting its goals and objectives. The city will monitor the effectiveness of the Consolidated Plan and submit reports to HUD. These reports will evaluate the performance of the Consolidated Plan by examining and commenting on project costs and benefits.

MONITORING OF SUBRECIPIENTS

Contract Agreements: The city will enter binding contractual agreements with all other parties participating in federal programs. Such agreements will insure compliance with program provisions between the City and these parties. Additionally, these agreements will provide a basis for enforcing program requirements and for identifying remedies in the event of a breach of any of the provisions. Elements contained in these agreements will be inclusive of, but not limited to:

- Type of activity
- Specific "boiler plate" provisions
- Other terms and conditions
- Special program requirements
- Budget
- Scope of services
- Reporting requirements
- Other special provisions

Monitoring Standards: The city will monitor the program through communication and evaluation of program participants. Such a process involves frequent telephone contacts, written communication, analysis of reports and audits, and periodic meetings. The primary goal of monitoring will be to identify deficiencies and advocate corrections in order to improve and reinforce participant performance. As part of this process, the city will watch for evidence of fraud, waste and mismanagement or for situations with potential for such abuse. The emphasis will be on prevention, detection and correction of problems. Technical assistance may be included, if required.

The City of Venice will monitor each program participant annually, or more frequently if circumstances should require, in order to review the activities included in their agreement with the city. The purpose of this monitoring is to assess compliance with the requirements of the federal program. Such review will include desk audits and on-site examinations to determine compliance with all applicable requirements.

Monitoring activities shall be comprised of the following:

- Development of an annual monitoring strategy
- Selection of program areas to review
- Timing of monitoring visits
- Follow-up action
- Assessment of individual activities
- Assessment of progress for the program as a whole
- On-site procedures
- Conclusions

The city may conduct a workshop to provide training to those agencies selected to receive CDBG funding. The workshop will include information regarding CDBG contracts, fiscal management requirements, recordkeeping, reporting requirements, and monitoring of projects by the city.

A Comprehensive Planner has been involved in preparing this Consolidated Plan to ensure that all projects fall within comprehensive planning requirements. Any redevelopment areas will have to go through technical planning review process which is overseen by the Planning and Zoning Department.

Lead-based Paint

1. Describe the actions that will take place during the next year to evaluate and reduce the number of housing units containing lead-based paint hazards in order to increase the inventory of lead-safe housing available to extremely low-income, low-income, and moderate-income families, and how the plan for the reduction of lead-based hazards is related to the extent of lead poisoning and hazards.

Program Year 1 Action Plan Lead-based Paint response:

Based on information from the Sarasota Consortium and the Sarasota County Health Department, there is not a recent history of lead-based paint hazards and there has not been a widespread problem.

The Health Department tests all clients up to age six for lead exposure. Children over age six are tested only if they are considered high risk. Private physicians occasionally test for lead exposure and refer clients to the Health Department. High lead count is a mandatory reportable incident to the state.

Officials at the Sarasota County Health Department said they have found very few incidents where lead numbers were in the 10 to 15 mg/dcl (micrograms per deciliter) range which they investigate as a public service. At 15 mg/dcl, action and investigation is mandatory. The State Health Department reports only one child with lead poisoning throughout the entire county from 2004 and 2006 with a blood lead level that required action.

The city will continue to cooperate with the Sarasota Consortium that takes the following measures to evaluate and reduce lead based paint hazards:

- Low income homeowners who discover lead based paint in their homes will qualify for a grant to remedy the risks posed by the lead.
- Individuals qualifying for rental assistance through the Section 8 program will receive a HUD pamphlet titled "Protect Your Family from Lead in Your Home"
- Owners of Section 8 rental properties constructed prior to 1979 that receive Federal assistance through the Sarasota Office of Housing and Community development are required to send new tenants the applicable lead-based paint notices
- Section 8 units and sites must be in compliance with the new HUD lead based paint regulations
- Individuals taking part in a Down Payment Assistance Program receive a copy of "Protect Your Family from Lead in Your Home"
- Units rehabilitated using federal funds will be required to abide by new HUD lead based paint regulations.

HOUSING

Specific Housing Objectives

*Please also refer to the Housing Needs Table in the Needs.xls workbook.

1. Describe the priorities and specific objectives the jurisdiction hopes to achieve during the next year.
2. Describe how Federal, State, and local public and private sector resources that are reasonably expected to be available will be used to address identified needs for the period covered by this Action Plan.

Program Year 1 Action Plan Specific Objectives response:

~~In 2008/2009, the city will establish an Affordable Housing Advisory Committee to assist in future Consolidated Plan compilation and assist in goals and objectives for the SHIP program.~~

~~**Homeownership Activities**~~

Need	1
Priority	1: The amount of people going through foreclosure is rising, and the cost for single family homes is still high in some areas.
Strategy	Work with the Sarasota Consortium and various non-profit agencies to address facilities and individuals facing foreclosures and need affordable housing.
Obstacles	Limited amounts of funding.
Resources	Non-profit agencies such as Royal Venice and Catholic Charities.
Funding	Funded by non-profit agencies.
Time-Period	Yearly — outcomes will vary based on funding ability.

The private sector will continue to work on affordable housing opportunities:

Affordable Housing

Need	2
Priority	2: Affordable housing was ranked the highest priority by service providers and city council.
Strategy	Local non-profit agencies are working to provide affordable and workforce housing in the city. Projects such as the proposed "Bridges" development will provide affordable workforce housing.
Obstacles	Limited amounts of funding, "not in my backyard" views, may be limits on how the property can be developed.
Resources	Habitat for Humanity, Gulf Coast Community Foundation of Venice, other local non-profit agencies.
Funding	Overseen and funded by local non-profit agencies.
Time Period	Ongoing.

Needs of Public Housing

1. Describe the manner in which the plan of the jurisdiction will help address the needs of public housing and activities it will undertake during the next year to encourage public housing residents to become more involved in management and participate in homeownership.
2. If the public housing agency is designated as "troubled" by HUD or otherwise is performing poorly, the jurisdiction shall describe the manner in which it will provide financial or other assistance in improving its operations to remove such designation during the next year.

Program Year 1 Action Plan Public Housing Strategy response:

The Venice Housing Authority has been labeled by HUD as troubled. ~~The city will not undertake any activities during this year since the housing authority is working on relocating residents, locating funding and they are going to develop a master development plan. Future year funding is allocated for the Venice Housing Authority. All residents at the housing authority have been relocated and the building is vacant. Norstar/Primerica Multi-Family Development Group has been hired by the housing authority to oversee the development. The current buildings will be demolished and redevelopment will be split into two phases. Phase 1 will be senior housing; Phase 2 will be multi-family units. The developer is currently seeking tax credits for the first phase. Year One CDBG funds will go towards infrastructure design in phase 1.~~

Need	1
Priority	1: Affordable housing was ranked the highest priority by service providers and city council to address the troubled Venice Housing Authority.
Strategy	The Venice Housing Authority is working to create a master plan for a new housing authority. The city will set aside funds from CDBG to help with infrastructure.
Obstacles	Limited amounts of funding, "not in my backyard" views, may be limits on how the property can be developed.
Resources	Venice Housing Authority, various non-profit organizations. The city will provide CDBG funds to assist with stormwater, infrastructure, lighting and/or sidewalks.
Funding	CDBG \$201,000 over a three year period, and \$22,055.40 from CDBG-R
Time Period	3 years – 50 low income households to benefit.

Barriers to Affordable Housing

1. Describe the actions that will take place during the next year to remove barriers to affordable housing.

Program Year 1 Action Plan Barriers to Affordable Housing response:

The Sarasota Consortium is in the process of conducting an updated Analysis of Impediments to Fair Housing. Their analysis is done county wide and will include the City of Venice. The document will be drafted and submitted for approval by the Office of Fair Housing and Equal Opportunity (FHEO) in the late fall/early winter of 2008. The last Analysis of Impediments to Fair Housing Choice in Sarasota County was completed on April 1, 2002.

The city, in cooperation with the Sarasota Office of Housing and Community Development, will provide education and outreach to landlords, property owners, realtors, developers, banks and non-profit organizations who provide or develop affordable housing. In addition, the city will continue to seek ways to assist developers and all of those involved in affordable housing in locating land, providing waivers of fees, and technical assistance to encourage the development of affordable housing and compliance with fair housing laws. Any agreements executed with affordable housing providers will incorporate the requirements of the equal opportunity and fair housing laws.

Public policies are designed to balance competing interests in the community. To ensure that the interests of affordable housing are being considered, the City of Venice requires all public policies be reviewed for impact on the cost of housing before City Council considers and adopts them.

HOME/ American Dream Down payment Initiative (ADDI)

1. Describe other forms of investment not described in § 92.205(b).
2. If the participating jurisdiction (PJ) will use HOME or ADDI funds for homebuyers, it must state the guidelines for resale or recapture, as required in § 92.254 of the HOME rule.
3. If the PJ will use HOME funds to refinance existing debt secured by multifamily housing that is that is being rehabilitated with HOME funds, it must state its refinancing guidelines required under § 92.206(b). The guidelines shall describe the conditions under which the PJ will refinance existing debt. At a minimum these guidelines must:
 - a. Demonstrate that rehabilitation is the primary eligible activity and ensure that this requirement is met by establishing a minimum level of rehabilitation per unit or a required ratio between rehabilitation and refinancing.
 - b. Require a review of management practices to demonstrate that disinvestments in the property has not occurred; that the long-term needs of the project can be met; and that the feasibility of serving the targeted population over an extended affordability period can be demonstrated.
 - c. State whether the new investment is being made to maintain current affordable units, create additional affordable units, or both.
 - d. Specify the required period of affordability, whether it is the minimum 15 years or longer.
 - e. Specify whether the investment of HOME funds may be jurisdiction-wide or limited to a specific geographic area, such as a neighborhood identified in a neighborhood revitalization strategy under 24 CFR 91.215(e)(2) or a Federally designated Empowerment Zone or Enterprise Community.

- f. State that HOME funds cannot be used to refinance multifamily loans made or insured by any federal program, including CDBG.
4. If the PJ is going to receive American Dream Down payment Initiative (ADDI) funds, please complete the following narratives:
 - a. Describe the planned use of the ADDI funds.
 - b. Describe the PJ's plan for conducting targeted outreach to residents and tenants of public housing and manufactured housing and to other families assisted by public housing agencies, for the purposes of ensuring that the ADDI funds are used to provide down payment assistance for such residents, tenants, and families.
 - c. Describe the actions to be taken to ensure the suitability of families receiving ADDI funds to undertake and maintain homeownership, such as provision of housing counseling to homebuyers.

Program Year 1 Action Plan HOME/ADDI response:

The City of Venice will not receive HOME or ADDI funding.

HOMELESS

Specific Homeless Prevention Elements

*Please also refer to the Homeless Needs Table in the Needs.xls workbook.

1. Sources of Funds—Identify the private and public resources that the jurisdiction expects to receive during the next year to address homeless needs and to prevent homelessness. These include the McKinney-Vento Homeless Assistance Act programs, other special federal, state and local and private funds targeted to homeless individuals and families with children, especially the chronically homeless, the HUD formula programs, and any publicly-owned land or property. Please describe, briefly, the jurisdiction's plan for the investment and use of funds directed toward homelessness.
2. Homelessness—In a narrative, describe how the action plan will address the specific objectives of the Strategic Plan and, ultimately, the priority needs identified. Please also identify potential obstacles to completing these action steps.
3. Chronic homelessness—The jurisdiction must describe the specific planned action steps it will take over the next year aimed at eliminating chronic homelessness by 2012. Again, please identify barriers to achieving this.
4. Homelessness Prevention—The jurisdiction must describe its planned action steps over the next year to address the individual and families with children at imminent risk of becoming homeless.
5. Discharge Coordination Policy—Explain planned activities to implement a cohesive, community-wide Discharge Coordination Policy, and how, in the coming year, the community will move toward such a policy.

Program Year 1 Action Plan Homeless response:

The City of Venice will continue to participate with the Continuum of Care to meet homeless prevention elements.

The goals of the Continuum of Care are to:

- Create new permanent housing beds for chronically homeless
- Increase the percentage of homeless persons staying in permanent housing over 6 months
- Increase the amount of persons moving from transitional housing to permanent housing
- Develop a coordinated transportation system to meet employment, medical and other service needs
- Assist provider agencies in strengthening their capacity and resources
- Increase homeless prevention services and coordinate with various local resources
- Develop a bi-county ten-year strategic plan to end chronic homelessness in Manatee and Sarasota Counties.

According to the Sarasota County Coalition for the Homeless, the following are priority needs of the homeless in Sarasota County:

1. Affordable housing
2. A living wage
3. Better public transportation
4. Assistance with security and utility deposits for individuals overcoming homelessness.

The jurisdiction has the following strategies to combat homelessness:

1. Continue to work with the Sarasota Consortium to encourage a land trust and affordable housing trust to produce and maintain affordable housing projects.
2. Continue to work with the Venice Housing Authority to provide additional housing units for low and very low income people.
3. Work with the Suncoast Partnership to End Homelessness and assist them as needed to address homeless prevention and chronic homelessness.
4. Continue to work with the Gulf Coast Community Foundation of Venice to provide assistance for housing for moderate income families. The Bridges is a project that is located within city limits that will house workforce families.
5. Work with service providers on adjusting impact fees and zoning concerns for the development of low to moderate income projects.

The city will continue to participate with the Sarasota Office of Housing and Community Development (SOHCD) and the Sarasota Consortium to address the end of Chronic Homelessness. SOHCD has a twofold approach to ending chronic homelessness that involves service development and outreach.

Service development includes increasing the current capacity of existing services to chronic homeless. Emergency shelters, provision of food and basic medical care are high priorities. SOHCD will use HOME dollars to fund 10 housing vouchers annually for those graduating from transitional shelters to safe and affordable housing. SOHCD has also recruited retired doctors, dentists, nurses for a successful health

clinic for the elderly. They are currently working to expand the concept for general chronic homeless populations.

Emergency Shelter Grants (ESG)

(States only) Describe the process for awarding grants to State recipients, and a description of how the allocation will be made available to units of local government.

Program Year 1 Action Plan ESG response:

This does not apply to the City of Venice.

COMMUNITY DEVELOPMENT

Community Development

*Please also refer to the Community Development Table in the Needs.xls workbook.

1. Identify the jurisdiction's priority non-housing community development needs eligible for assistance by CDBG eligibility category specified in the Community Development Needs Table (formerly Table 2B), public facilities, public improvements, public services and economic development.
2. Identify specific long-term and short-term community development objectives (including economic development activities that create jobs), developed in accordance with the statutory goals described in section 24 CFR 91.1 and the primary objective of the CDBG program to provide decent housing and a suitable living environment and expand economic opportunities, principally for low- and moderate-income persons.

*Note: Each specific objective developed to address a priority need, must be identified by number and contain proposed accomplishments, the time period (i.e., one, two, three, or more years), and annual program year numeric goals the jurisdiction hopes to achieve in quantitative terms, or in other measurable terms as identified and defined by the jurisdiction.

Program Year 1 Action Plan Community Development response:

The Venice Housing Authority was determined to have the highest need for community assistance. ~~however, they are in the process of relocating residents. It is expected that the Venice Housing Authority will utilize CDBG funds in 2010.~~

The following activity will begin in the first program year and will carry on to the second year:

Neighborhood Improvements

Need	2
Priority	2: Reduce flooding in the Airport Census Tract
Strategy	Provide engineering and construction services to an area that needs stormwater modifications to reduce the risk of flooding.
Obstacles	None.

Resources	City of Venice
Funding	\$134,000 CDBG
Time Period	2 years — Approximately 30 households will benefit.

Affordable Housing

Need	1
Priority	1: Affordable housing was ranked the highest priority by service providers and city council to address the troubled Venice Housing Authority.
Strategy	The Venice Housing Authority is working to create a master plan for a new housing authority. The city will set aside funds from CDBG to help with infrastructure.
Obstacles	Limited amounts of funding, “not in my backyard” views, may be limits on how the property can be developed.
Resources	Venice Housing Authority, various non-profit organizations. The city will provide CDBG funds to assist with stormwater, infrastructure, lighting and/or sidewalks.
Funding	CDBG \$201,000 over a five year period.
Time Period	3 years – 50 low income households to benefit.

Antipoverty Strategy

1. Describe the actions that will take place during the next year to reduce the number of poverty level families.

Program Year 1 Action Plan Antipoverty Strategy response:

The city will continue to participate under the Sarasota Consortium programs that are designed to reduce the number of poverty level households in Sarasota County through the provision of human services, the creation of economic opportunities in low-income areas, and the improvement of the physical condition of lower income areas. The largest element of the anti-poverty strategy is the community’s successful implementation of the Continuum of Care for the homeless and those in danger of becoming homeless.

The city will continue to work with the Gulf Coast Community Foundation of Venice for providing workforce housing opportunities.

NON-HOMELESS SPECIAL NEEDS HOUSING

Non-homeless Special Needs (91.220 (c) and (e))

*Please also refer to the Non-homeless Special Needs Table in the Needs.xls workbook.

1. Describe the priorities and specific objectives the jurisdiction hopes to achieve for the period covered by the Action Plan.
2. Describe how Federal, State, and local public and private sector resources that are reasonably expected to be available will be used to address identified needs for the period covered by this Action Plan.

Program Year 1 Action Plan Specific Objectives response:

The city will participate with the Sarasota Consortium to address the low income elderly, those with addiction problems, HIV/AIDS victims, and disabled low income residents. The city will also make funds available for meal transportation to elderly and disabled residents.

Special Needs

Need	1
Priority	1: Because of the city’s elderly population, special needs are ranked second for need.
Strategy	Assist meal transportation services who serve low income elderly and the disabled.
Obstacles	Limited amounts of funding.
Resources	CDBG funds, non-profit agencies.
Funding	\$25,000 (shared with Homelessness Need 4/Priority 1)
Time Period	5 years – At least 250 people served over 5 years.

Housing Opportunities for People with AIDS

*Please also refer to the HOPWA Table in the Needs.xls workbook.

1. Provide a Brief description of the organization, the area of service, the name of the program contacts, and a broad overview of the range/ type of housing activities to be done during the next year.
2. Report on the actions taken during the year that addressed the special needs of persons who are not homeless but require supportive housing, and assistance for persons who are homeless.
3. Evaluate the progress in meeting its specific objective of providing affordable housing, including a comparison of actual outputs and outcomes to proposed goals and progress made on the other planned actions indicated in the strategic and action plans. The evaluation can address any related program adjustments or future plans.
4. Report on annual HOPWA output goals for the number of households assisted during the year in: (1) short-term rent, mortgage and utility payments to avoid homelessness; (2) rental assistance programs; and (3) in housing facilities, such as community residences and SRO dwellings, where funds are used to develop and/or operate these facilities. Include any assessment of client outcomes for achieving housing stability, reduced risks of homelessness and improved access to care.
5. Report on the use of committed leveraging from other public and private resources that helped to address needs identified in the plan.
6. Provide an analysis of the extent to which HOPWA funds were distributed among different categories of housing needs consistent with the geographic distribution plans identified in its approved Consolidated Plan.
7. Describe any barriers (including non-regulatory) encountered, actions in response

to barriers, and recommendations for program improvement.

8. Please describe the expected trends facing the community in meeting the needs of persons living with HIV/AIDS and provide additional information regarding the administration of services to people with HIV/AIDS.
9. Please note any evaluations, studies or other assessments that will be conducted on the local HOPWA program during the next year.

Program Year 1 Action Plan HOPWA response:

The City of Venice will not be receiving HOPWA funds and will continue to participate with the Sarasota Consortium to meet the needs in their Consolidated Plan.

The Sarasota Consortium addresses the needs of persons with HIV/AIDS and families of these persons who are not homeless but require supportive housing and the needs of the same client population who are homeless, HOPWA funds are used for activities such as:

- Short term rent, mortgage and utility assistance
- Case management
- Grantee administration
- Project sponsor administration

The City of Sarasota is the lead jurisdiction and ensures:

1. Regular meetings with the HOPWA team are scheduled
2. Assists in locating required information for team members to perform optimally
3. Assists in leading the team in exploring all available opportunities and resources to ensure a strategic plan complete with a mission, vision, organizational values, and quantifiable measures are created
4. Monitors all reimbursement requests from the project sponsor for accuracy, completeness, compliance, and performs on-site monitoring

The project sponsor that assists in administering the HOPWA Grant for the Sarasota/Manatee counties also assists the State of Florida in administering State HOPWA funds. The dual role of the project sponsor allows for the use of actual case history to make funding decisions for Sarasota County and the City of Venice based on historic information.

Specific HOPWA Objectives

Describe how Federal, State, and local public and private sector resources that are reasonably expected to be available will be used to address identified needs for the period covered by the Action Plan.

Program Year 1 Specific HOPWA Objectives response:

The City of Venice will not receive HOPWA funds, but will cooperate with the Sarasota Consortium to meet the needs in their Consolidated Plan.

Other Narrative

Include any Action Plan information that was not covered by a narrative in any other section.