



2025 ANNUAL ACTION PLAN

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

Community Development Block Grant (CDBG)

HOME Investment Partnerships Program (HOME)

Emergency Solutions Grant (ESG)

August 5, 2025 – Modified in Response to Comment on September 16, 2025

Lee County Board of County Commissioners

Human & Veteran Services

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Executive Summary

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

1. Introduction

The 2025 Annual Action Plan is a required submission to sustain entitlement funding from the U.S. Department of Housing and Urban Development (HUD), including the Community Development Block Grant (CDBG), HOME Investment Partnership Program (HOME), and Emergency Solutions Grant (ESG) programs. This annual plan identifies the expected resources and projects to address the community's priority needs and goals established by the 2024-2028 Consolidated Plan. The 2025 Annual Action Plan provides detailed information regarding the County's planned use of funds during the second program year of the five-year planning period.

2. Summarize the objectives and outcomes identified in the Plan

In the 2024-2028 Consolidated Plan, Lee County identified six (6) goals based on 11 priority needs. Priority needs are consistent with past needs, with emphasis on the need for affordable housing and housing assistance. The six (6) goals include:

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

3. Evaluation of past performance

Past project performance provided the basis for identification and selection of the goals in the 2024-2028 Consolidated Plan and projects in this 2025 Annual Action Plan. Projects such as housing rehabilitation, carried out with CDBG funds, and downpayment assistance, carried out with HOME funds, have had long-term success within Lee County. Successful outcomes were also obtained through the HOME Tenant-Based Rental Assistance (TBRA) program. These programs will be continued as projects in the 2025 Annual Action Plan.

Lee County faced several challenges in past years, including hurricane Ian, Helene, and Milton, and the COVID-19 pandemic. The hurricanes caused significant destruction, highlighting the need for more affordable housing. To address this priority need, the County plans to use HUD funding to support non-profit housing development and provide downpayment assistance. This will help increase access to affordable housing units. The County will also fund non-profit capital improvements and support non-profit service providers.

As the community recovers, inflation continues to impact households with incomes at or below 80% of the area median income. These households need additional affordable housing, rental assistance, economic support, and expanded mental/behavioral health services.

A 2019 gaps analysis identified several gaps in Lee County, including behavioral health, housing, and transportation. Citizen participation and consultation during the 2024-2028 Consolidated Plan process confirmed the importance of continuing previous programs and projects in 2025, the second program year.

4. Summary of Citizen Participation Process and consultation process

Citizen participation efforts included a Community Action Agency (CAA) public hearing, 30-day public comment period, and Board of County Commissioners (BoCC) public hearing. Attendees at the public hearings included representatives from non-profit organizations, neighborhood advisory councils, various government departments, and Lee County residents.

The public hearings (CAA and BoCC) and 30-day public comment period were noticed in the newspaper and via emails to local non-profit and neighborhood organizations and participating Urban County communities, posted by Lee County press/social media release, and posted on the Lee County Human & Veteran Services website.

The CAA public hearing on June 17, 2025, provided attendees with an overview of the Annual Action Plan process and HUD's entitlement formula allocations for the 2025 program year, and solicited input regarding the County's proposed use of funds. Citizens and stakeholders were also encouraged to submit comments to the Lee County Human & Veteran Services department at any time prior to and until the end of the 30-day comment period held in July 2025.

The draft 2025 Annual Action Plan was also made available for a 30-day public comment period in July 2025. On August 5, 2025, after providing an opportunity to hear public comments at its regular meeting, the Board of County Commissioners considers approval of the Annual Action Plan for submittal to HUD.

5. Summary of public comments

A summary of comments received is attached to this plan and can be viewed in the **Citizen Participation Comments** (attachment).

Comments submitted during the CAA public hearing, 30-day public comment period, or Board of County Commissioners consideration of approval on August 5, 2025, will be included in the attachment. As of July 22, 2025, no comments had been submitted during the 30-day public comment period.

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

All comments received were considered during the development of the 2025 Annual Action Plan and selection of projects to be implemented during the second program year of the five-year planning period.

7. Summary

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

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

As of July 22, 2025, no comments had been submitted during the 30-day public comment period for the 2025 Annual Action Plan.

To address the Consolidated Plan's goals and comments received during the 2025 Annual Action Plan citizen participation process, the County has identified 10 projects to be implemented during the second program year of the five-year planning period. These projects include:

- CDBG Program Administration
- HOME Program Administration
- HOME Housing Development
- Downpayment Assistance
- Tenant-Based Rental Assistance (TBRA)
- Owner Occupied Housing Rehabilitation and Delivery
- Public Services
- Non-Profit Capital Improvements/Public Facility/Infrastructure
- Urban County Projects
- ESG25 Lee County

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

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

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

Table 1 – Responsible Agencies

Narrative (optional)

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

Annual Action Plan Public Contact Information

Questions and correspondence relating to the Consolidated Plan or Annual Action Plan should be directed to Stacy Sherlock, Grants Analyst, Grants and Data Management, Lee County Human & Veteran Services by mail at 2440 Thompson St., Fort Myers, FL 33901, by phone at 239-533-7931 or by e-mail at ssherlock@leegov.com.

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

1. Introduction

Consultation during the development of the 2024-2028 Consolidated Plan, comprised of input from the public and non-profit and neighborhood organizations, provided the basis for identification of priority needs to be addressed during the five-year planning period. Similar consultation occurred during the development of the 2025 Annual Action Plan, which covers the second year of the five-year planning period. Lee County held a 30-day public comment period in July 2025, and public hearings with the Community Action Agency (CAA) and Board of County Commissioners on June 17, 2025, and August 5, 2025, respectively. Additionally, direct consultation with stakeholders occurred through phone calls and email correspondence to obtain input.

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

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

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

In 2019, the Lee County Continuum of Care adopted the 2019-2028 Continuum of Care Strategic Plan to guide the effort to address the housing needs of Lee County. The 2019-2028 Strategic Plan outlines accomplishments and goals relating to Housing, Health Services, Supportive Services, Education and Employment Services, Public Safety and Transportation within Lee County. The Strategic Plan also outlines overall goals to address homelessness in Lee County through supportive services and grants. Lee County Human & Veteran Services is the Lead Agency for the Continuum of Care and has spearheaded the local effort to ensure compliance with the HEARTH Act provisions. There is continuous coordination between Lee County, the Lee County Homeless Coalition, and the Continuum of Care as a whole, to address the needs of persons who are homeless or at risk of homelessness. Coordination includes discharge planning, identifying needs and gaps in the community, evaluating system and project performance, establishing system-wide written standards, and researching project models and funding sources.

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

Describe consultation with the Continuum(s) of Care that serves the jurisdiction's area in determining how to allocate ESG funds, develop performance standards 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

As previously noted, Lee County is the Lead Agency for the Continuum of Care and continuously consults with the Continuum of Care Governing Board and General Membership regarding ESG planning. Continuum of Care members continue to support the current ESG program structure, in which Lee County Human & Veteran Services administers a portion of the ESG allocation to provide outreach and rapid re-housing assistance to eligible households.

In 2024, the Continuum of Care Governing Board established new project performance targets and approved continuum-wide written standards. In August of 2024, the Board also approved the Coordinated Entry policies and procedures in accordance with CPD Notice 17-01. ESG projects are monitored annually, and outcomes are included in system performance measures.

In 2019, Continuum of Care Board members voted to change ESG funding from funding the operations of the Bob Janes Empowerment Center to funding Rapid Re-Housing for persons admitted to the Bob Janes Empowerment Center, and to continue the rapid re-housing program administered by Human & Veteran Services. The Center subsequently closed in 2024.

The Continuum of Care and Lee County Homeless Coalition were consulted during the development of the 2025 Annual Action Plan regarding the needs of homeless persons and those at risk of homelessness.

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

Table 2 – Agencies, groups, organizations who participated

1	Agency/Group/Organization	Lee County Human & Veteran Services Department
	Agency/Group/Organization Type	Other (Grantee Department) Grantee Department
	What section of the Plan was addressed by Consultation?	All sections Other (Strategic Plan, Annual Action Plan)
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Lee County Human & Veteran Services is the grantee department responsible for coordination of citizen participation, prioritization, and goal setting. Human & Veteran Services is also the lead agency for the Continuum of Care.
2	Agency/Group/Organization	Lee County Economic Development
	Agency/Group/Organization Type	Business Leaders
	What section of the Plan was addressed by Consultation?	Non-Housing Community Development Strategy Anti-Poverty Strategy
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Lee County Economic Development was consulted through research of published plans, reports, and website content.
3	Agency/Group/Organization	City of Sanibel
	Agency/Group/Organization Type	Other government - Local
	What section of the Plan was addressed by Consultation?	Non-Housing Community Development Strategy
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	The City of Sanibel was notified of the 30-day public comment period and consulted by Lee County Human & Veteran Services staff about intergovernmental coordination for Urban County needs.
4	Agency/Group/Organization	City of Bonita Springs
	Agency/Group/Organization Type	Other government - Local
	What section of the Plan was addressed by Consultation?	Non-Housing Community Development Strategy

	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	The City of Bonita Springs was notified of the 30-day public comment period and consulted by Lee County Human & Veteran Services staff about intergovernmental coordination for Urban County needs.
5	Agency/Group/Organization	Town of Fort Myers Beach
	Agency/Group/Organization Type	Other government - Local
	What section of the Plan was addressed by Consultation?	Non-Housing Community Development Strategy
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	The Town of Fort Myers Beach was notified of the 30-day public comment period and consulted by Lee County Human & Veteran Services staff about intergovernmental coordination for Urban County needs.
6	Agency/Group/Organization	Village of Estero
	Agency/Group/Organization Type	Other government - Local
	What section of the Plan was addressed by Consultation?	Non-Housing Community Development Strategy
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	The Village of Estero was notified of the 30-day public comment period and consulted by Lee County Human & Veterans Services staff about intergovernmental coordination for Urban County needs.
7	Agency/Group/Organization	Lee County Housing Authority
	Agency/Group/Organization Type	PHA
	What section of the Plan was addressed by Consultation?	Housing Needs Assessment Public Housing Needs
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	The Lee County Housing Authority was consulted through direct email and phone contact, as well as research of published plans, reports, and website content.
8	Agency/Group/Organization	The Housing Authority of the City of Fort Myers
	Agency/Group/Organization Type	PHA Services-Fair Housing

	What section of the Plan was addressed by Consultation?	Housing Needs Assessment Public Housing Needs
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	The Housing Authority of City of Fort Myers was consulted through direct email and phone contact, as well as research of published plans, reports, and website content. Consultation regarding Fair Housing yielded comments regarding the need for Fair Housing education to prevent voucher discrimination. The Housing Authority of the City of Fort Myers holds regular landlord education sessions monthly. Potential for coordination with Human & Veteran Services and distribution of Fair Housing information.
9	Agency/Group/Organization	Lee County Community Action Agency/Neighborhood District Committee Advisory Board (CAA/NDC)
	Agency/Group/Organization Type	Other (Advisory Committee)
	What section of the Plan was addressed by Consultation?	Homelessness Strategy Non-Housing Community Development Strategy
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	A public hearing with the CAA was held on June 17, 2025, with members in attendance.
10	Agency/Group/Organization	Lee County Homeless Coalition
	Agency/Group/Organization Type	Services-Homeless
	What section of the Plan was addressed by Consultation?	Homeless Needs – Chronically homeless Homeless Needs – Families with children Homeless Needs – Veterans Homeless Needs – Unaccompanied youth Homelessness Strategy
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	The Lee County Homeless Coalition was consulted through direct email and phone contact, as well as research of published plans, reports, and website content.

11	Agency/Group/Organization	Area Agency on Aging for Southwest Florida
	Agency/Group/Organization Type	Services-Elderly Persons
	What section of the Plan was addressed by Consultation?	Non-Homeless Special Needs
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Attended the CAA public hearing held on June 17, 2025, with opportunity to provide input.
12	Agency/Group/Organization	BCW Enterprise Consulting Group
	Agency/Group/Organization Type	Services-Homeless
	What section of the Plan was addressed by Consultation?	Homelessness Strategy
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Attended the CAA public hearing held on June 17, 2025, with opportunity to provide input.
13	Agency/Group/Organization	Quality Life Center of Southwest Florida, Inc.
	Agency/Group/Organization Type	Services-Children Services-Education Other (Services-Mental Health)
	What section of the Plan was addressed by Consultation?	Non-Homeless Special Needs Non-Housing Community Development Strategy
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Attended the CAA public hearing held on June 17, 2025, with opportunity to provide input.
14	Agency/Group/Organization	The Salvation Army
	Agency/Group/Organization Type	Services-Homeless
	What section of the Plan was addressed by Consultation?	Homeless Needs – Chronically homeless Homeless Needs – Families with children Homeless Needs – Veterans Homeless Needs – Unaccompanied youth Homelessness Strategy

	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Attended the CAA public hearing held on June 17, 2025, with opportunity to provide input.
15	Agency/Group/Organization	CareerSource Southwest Florida
	Agency/Group/Organization Type	Services-Employment
	What section of the Plan was addressed by Consultation?	Non-Housing Community Development Strategy
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Attended the CAA public hearing held on June 17, 2025, with opportunity to provide input.
16	Agency/Group/Organization	Federal Communications Commission (FCC)
	Agency/Group/Organization Type	Services - Broadband Internet Service Providers Services - Narrowing the Digital Divide
	What section of the Plan was addressed by Consultation?	Market Analysis
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	The Federal Communications Commission (FCC) National Broadband Map was consulted to verify that Lee County is well covered by fixed and mobile broadband providers. Areawide coverage is met by four (4) major mobile broadband providers (4G or 5G) and 10 fixed broadband providers (ranging from 0.2/0.2 Mbps to 1000/100 Mbps). Over 98% of units are covered by mobile broadband speeds of at least 4G, and nearly 100% of units are covered by fixed broadband speeds of at least 25/3 Mbps, the minimum threshold for broadband access as defined by the FCC.
17	Agency/Group/Organization	Lee County Strategic Resources and Government Affairs

	Agency/Group/Organization Type	Agency - Managing Flood Prone Areas Agency - Management of Public Land or Water Resources Agency - Emergency Management Grantee Department
	What section of the Plan was addressed by Consultation?	Expected Resources, Projects
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Lee County Strategic Resources and Government Affairs, an office of Lee County Government, was directly consulted regarding the County's CDBG-DR Action Plans and coordination of planning and response to natural disasters, such as the recent hurricanes Ian, Helene, and Milton. Strategic Resources and Government Affairs provided information about proposed activities and funding allocations for hazard mitigation and disaster recovery. Respective CDBG-DR Action Plans are available on the County's website: https://cdbgdr.leegov.com/ Consultation for the County's CDBG-DR program involved coordination with Lee County departments, Urban County communities, School and Fire districts, and utility provider partners regarding stormwater and flood management, water quality, and system operability. This coordination is reflected in the CDBG-DR Action Plans and proposed activities related to public facilities and critical infrastructure.

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

The 30-day public comment period for the 2025 Annual Action Plan was open to the public and broadly advertised. The CAA public hearing held on June 17, 2025 was also advertised, and was attended by a majority of the CAA members, along with several members of the public.

Describe 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	Lee County Human & Veteran Services	The Lee County Continuum of Care implemented a new Strategic Plan in April 2019, the Lee County Continuum of Care 2019-2028 Strategic Plan. Two goals of the 2024-2028 Consolidated Plan overlap with the Continuum of Care Strategic Plan: Public Services and Homeless/Special Needs Services and Shelter, Public Facility, and Infrastructure Improvements.
Analysis of Impediments to Fair Housing Choice	Lee County Human & Veteran Services	One goal of the 2024-2028 Consolidated Plan overlaps with the Analysis of Impediments to Fair Housing Choice: Affordable Housing Construction, Rehabilitation, and Assistance.
Community Needs Assessment	Lee County Human & Veteran Services	The Community Needs Assessment, as required by the Florida Department of Commerce as a condition of the receipt of Community Services Block Grant (CSBG) funds, is complete. Because the citizen participation efforts for this plan overlapped with those of the Consolidated Plan, many priority needs mirror those identified for the Community Needs Assessment. All goals of the Consolidated Plan overlap with the Community Needs Assessment, particularly those concerning affordable housing, public services, and neighborhood improvements.

Table 3 – Other local / regional / federal planning efforts

Narrative (optional)

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

For the 2025 Annual Action Plan, Lee County Human & Veteran Services consulted with members of the CAA, which represents 12 stakeholders from non-profit and neighborhood organizations in Lee County. This consultation was in addition to the 30-day public comment period held in July 2025. Based on

previous consultation during the 2024-2028 Consolidated Plan, Lee County identified 11 priority needs to be addressed during the five-year planning period. The 2025 Annual Action Plan considers consultation input received from previous 2024 and current 2025 consultation efforts to identify programs and projects to implement during the second program year.

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

Lee County solicited public input through a public hearing held with the Community Action Agency (CAA) on June 17, 2025, to collect input from non-profit and neighborhood organizations. During the CAA public hearing, the County provided an overview of the Annual Action Plan process, and information regarding current programs and funding, to attendees. The CAA public hearing provided attendees with the opportunity to discuss priority needs as relevant to themselves or their organization. These discussions informed the 2025 Annual Action Plan. All projects identified in the 2025 Annual Action Plan address the priority needs identified in the 2024-2028 Consolidated Plan, and the corresponding five-year Strategic Plan goals.

A draft of the Consolidated Plan was also made available for a 30-day public comment period, starting July 1, 2025, and ending July 31, 2025. On August 5, 2025, after providing an opportunity to hear public comments at its regular meeting, the Board of County Commissioners considers approval of the 2025 Annual Action Plan for submittal to HUD.

Citizen Participation Outreach

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (if applicable)
1	Newspaper Ad	Non-targeted/broad community	A newspaper notice was published on June 3, 2025, and email notice sent to stakeholders regarding a public hearing with the CAA to be held on June 17, 2025, regarding the 2025 Annual Action Plan.	See CAA summary below.	See CAA summary below.	
2	Public Hearing	Non-targeted/broad community	In accordance with 24 CFR Part 91, a public hearing was advertised and held on June 17, 2025, where comment was solicited on the development of the 2025 Annual Action Plan. The public hearing was held at Lee County Human & Veteran Services in conjunction with the Community Action Agency/Neighborhood District Committee (CAA/NDC) meeting. Five (5) people	One question was generated at the public hearing regarding CDBG-DR, which was answered by reference to the separate CDBG-DR Action Plan.	All comments were accepted and considered during the development of the 2025 Annual Action Plan.	

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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)
			attended, not including grantee staff. The group was provided an overview of the planning process. Attendees were engaged to discuss priority needs.			
3	Newspaper Ad	Non-targeted/broad community	30-Day Comment Period. A newspaper notice was published, and email notice sent to stakeholders, regarding the availability of the draft 2025 Annual Action Plan for public comment for a period of 30-days starting July 1, 2025, and ending July 31, 2025.	Comments, if any, submitted during the 30-day public comment period will be included in the Citizen Participation Comments (attachment). As of July 22, 2025, no comments had been submitted during the 30-day public comment period.	All comments were accepted and considered during the development of the 2025 Annual Action Plan.	
4	Public Hearing	Non-targeted/broad community	In accordance with 24 CFR Part 91, a public hearing was advertised and held on August 5, 2025, where the Board of County Commissioners considered the 2025	Comments, if any, received by the Board of County Commissioners on August 5, 2025, will be included in the Citizen Participation Comments (attachment). See	All comments were accepted and considered during the development of the 2025 Annual Action Plan.	

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
			Annual Action Plan for approval and submittal to HUD.	attachment for meeting agenda/minutes.		

Table 4 – Citizen Participation Outreach

Expected Resources

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

Introduction

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

Lee County anticipates a total allocation of \$3,044,711 in CDBG funding for the 2025 program year. Program income from CDBG is expected to be approximately \$30,000, and \$3,047,260 in prior-year resources are anticipated. The total anticipated available resources are \$6,121,971 for the 2025 program year. CDBG funds will be used for housing and community development activities including but not limited to, housing rehabilitation, public services, public or non-profit improvements, Urban County projects, and administration of the County's CDBG program.

Lee County anticipates a total allocation of \$953,824.26 in HOME funding for the 2025 program year. Program income from HOME is expected to be approximately \$64,300, and \$2,366,101 in prior-year resources are anticipated. The total anticipated available resources are \$3,384,225.26 for the 2025 program year. HOME funds will be used for housing-related activities including, but not limited to, down payment assistance, affordable housing acquisition, rehabilitation, or new construction, Tenant-Based Rental Assistance (TBRA), and administration of the County's HOME program.

Lee County also anticipates a total allocation of \$274,830 in ESG funding for the 2025 program year. No program income and no prior-year resources are anticipated from ESG. ESG funds will be used for homeless street outreach activities, rapid rehousing, and administration of the County's ESG program.

Two additional funding sources, CDBG-DR and ESG-RUSH, were previously allocated to Lee County. The total allocation of CDBG-DR was \$1,107,881,000 (Hurricane Ian) and \$100,683,000 (Hurricanes Helene and Milton), and the total allocation of ESG-RUSH was \$1,849,306 (Hurricane Ian, second tranche) and \$529,738 (Hurricanes Helene and Milton). Details regarding the CDBG-DR allocation are more fully provided in separate planning documents titled, "Lee County CDBG-DR Action Plan, Amendment 6 (Hurricane Ian)" and "Lee County CDBG-DR Action Plan, Amendment 1 (Hurricanes Helen and Milton)", which are posted on the County's website. For the 2025 program year, anticipated funding to be programmed from these allocations includes \$883,748,850 in CDBG-DR and \$50,000 in ESG-RUSH.

The expected amount available during the remainder of the Consolidated Plan (2026-2028) is based on an estimated annual allocation of \$3,166,000 in CDBG funds, \$935,108 in HOME funds, and \$270,000 in ESG funds, excluding program income and prior-year resources as those amounts are unknown currently. This results in an estimated funding amount of \$9,658,228 in CDBG, \$2,786,607.74 in HOME, and \$804,021 in ESG over the remaining three-year period.

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

The Annual Action Plan must summarize Lee County's priority needs and goals to address during the first year of the Strategic Plan. These goals must be described in quantitative terms. Lee County has selected goal outcome indicators and quantities based on the anticipated performance measures of the 2025 Annual Action Plan. See AP-20.

Table 5 shows the anticipated resources available in Year 2 (2025) and Years 3-5 (2026-2028) (i.e., remainder) of the five-year planning period.

Anticipated Resources

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 2				Expected Amount Available Remainder of Con Plan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
CDBG	public - federal	Acquisition, Admin and Planning, Economic Development, Housing, Public Improvements, and Public Services	\$3,044,711	\$30,000	\$3,047,260	\$6,121,971	\$9,658,228	CDBG funds will be used in accordance with 24 CFR 570 and this Consolidated Plan to further address community development, housing, and homeless needs in Lee County.

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 2				Expected Amount Available Remainder of Con Plan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
HOME	public - federal	Acquisition, Homebuyer assistance, Homeowner rehab, Multifamily rental new construction, Multifamily rental rehab, New construction for ownership, and TBRA	\$953,824.26	\$64,300	\$2,366,101	\$3,384,225.26	\$2,786,607.74	HOME funds will be used in accordance with 24 CFR 92 and this Consolidated Plan to address housing needs in Lee County.

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 2				Expected Amount Available Remainder of Con Plan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
ESG	public - federal	Conversion and rehab for transitional housing, Financial Assistance, Overnight shelter, Rapid re-housing (rental assistance), Rental Assistance Services, and Transitional housing	\$274,830	\$0	\$0	\$274,830	\$804,021	ESG funds will be used in accordance with 24 CFR 576 and this Consolidated Plan to provide housing and services to persons experiencing homelessness in Lee County.

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 2				Expected Amount Available Remainder of Con Plan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
Other – CDBG-DR	public - federal	Other (CDBG-DR)	\$883,748,850	\$0	\$0	\$883,748,850	\$0	CDBG-DR (Disaster Relief) funds will be used consistent with the Lee County CDBG-DR Action Plan, which is a separate planning document.
Other – ESG-RUSH	public - federal	Other (ESG-RUSH)	\$0	\$0	\$50,000	\$50,000	\$0	ESG-RUSH funds will be used to address the unmet needs of individuals and families who are homeless or at risk of homelessness and affected by disaster.

Table 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

*HUD FY 2025 Formula Allocation; Notes: Program incomes and prior-year resources are estimated amounts and actual amounts may differ if larger sums are received from loan payoffs or cancelled or under budget projects. These amounts will be updated during the 2025 program year close-out.

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

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

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

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

Discussion

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

Annual Goals and Objectives

AP-20 Annual Goals and Objectives

Goals Summary Information

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
1	Affordable Housing Construction, Rehabilitation, and Assistance	2024	2028	Affordable Housing; Public Housing	N/A	New Construction and Rehabilitation for Affordable Housing; Rental and Down Payment Assistance	CDBG: \$600,000; HOME: \$3,003,219.26	Rental Units Constructed: 1 Household/Housing Units; Homeowner Housing Added: 2 Household/Housing Units; Homeowner Housing Rehabilitation: 14 Households/Housing Units; Direct Financial Assistance to Homebuyers: 8 Households Assisted; Tenant-Based Rental Assistance/Rapid Rehousing: 9 Households Assisted

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
2	Public Services and Homeless/Special Needs Services	2024	2028	Non-Housing Community Development; Homeless; Non-Homeless Special Needs	N/A	Public Services; Rental and Down Payment Assistance; Public Safety/Crime Prevention	CDBG: \$386,650; ESG: \$254,218; ESG-RUSH: \$50,000	Public Services activities other than Low/Moderate Income Housing Benefit: 11,030 Persons Assisted; Homeless Person Overnight Shelter: 6,500 Persons Assisted (Street Outreach); Tenant-Based Rental Assistance/Rapid Rehousing: 5 Households Assisted
3	Shelter, Public Facility, and Infrastructure Improvements	2024	2028	Non-Housing Community Development; Homeless; Non-Homeless Special Needs	LMA	Homeless/Special Needs Housing and Shelter; Public Facility Improvements; Public Infrastructure Improvements	CDBG: \$3,091,226	Other: 2 Other [Facilities]
4	Emergency/Urgent Needs and Disaster Recovery	2024	2028	Affordable Housing; Non-Housing Community Development	N/A	Emergency/Urgent Needs	CDBG-DR: \$883,748,850	Other: 1 Other [Year of CDBG-DR delivery, see narrative]

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
5	Urban County Needs	2024	2028	Non-Housing Community Development	N/A	Public Services; Public Facility Improvements; Public Infrastructure Improvements	CDBG: \$1,524,036	Other: 1 Other [Project]
6	Non-Goal Program Administration	2024	2028	Other: Administration	N/A	N/A	CDBG: \$520,059; HOME: \$381,006; ESG: \$20,612	Other: 0 Other

Table 6 – Goals Summary

Goal Descriptions

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

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

Estimate the number of extremely low-income, low-income, and moderate-income families to whom the jurisdiction will provide affordable housing as defined by HOME 91.215(b).

Specific to affordable housing, an estimated 38 households will be supported during the 2025 program year, using regular CDBG, HOME, or ESG funding. One (1) household will be supported using ESG-RUSH. The total number of households to be supported during the 2025 program year is 39 households.

Five (5) homeless households will be assisted with ESG or ESG-RUSH rapid re-housing. Another nine (9) non-homeless households will be assisted with Tenant-Based Rental Assistance (TBRA). Three (3) new rental or homeowner housing units will be constructed. An estimated 14 housing units will be rehabilitated, and eight (8) housing units will be acquired through downpayment assistance to be occupied by income-eligible homeowners.

Projects

AP-35 Projects – 91.220(d)

Introduction

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

Table 7 shows the projects and activities that will be funded during Year 2 (i.e., 2025) of the Consolidated Plan. Additional project information is provided in the subsequent table.

Projects

#	Project Name
1	CDBG Program Administration
2	HOME Program Administration
3	HOME Housing Development
4	HOME Downpayment Assistance
5	HOME Tenant-Based Rental Assistance (TBRA)
6	CDBG Owner Occupied Housing Rehabilitation and Delivery
7	CDBG Public Services
8	CDBG Non-Profit Capital Improvements/Public Facility/Infrastructure
9	CDBG Urban County Projects
10	ESG25 Lee County

Table 7 - Project Information

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

Allocation priorities were confirmed through the citizen participation process, through public hearings with the Community Action Agency (CAA) and Board of County Commissioners, and a 30-day public comment period, to consider funding allocations, projects, and activities. Lee County also considered past program performance and staff recommendations to weigh the feasibility of project implementation. Comments and concerns raised during the citizen participation process were taken into consideration when prioritizing projects.

As mentioned in previous sections, priority needs identified during the Citizen Participation process for the 2024-2028 Consolidated Plan included:

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

Public comments routinely indicated a significant need for additional affordable housing units. Lee County intends to undertake multiple projects to facilitate the development of additional affordable housing units. Obstacles to these projects may include limited availability of units to be acquired or rehabilitated and limited resources available to complete projects. Lee County will ensure that identified units are suitable for affordable housing development through underwriting, and coordination with community partners and other county departments, as required. Part of that coordination will occur through implementation of Lee County's CDBG-DR Action Plan, overseen by a different department, using Federal funding received in response to hurricanes Ian, Helene, and Milton.

CDBG-DR Allocation Priorities

Allocation priorities for CDBG-DR funding are provided in the "Lee County CDBG-DR Action Plan, Amendment 6 (Hurricane Ian)" and "Lee County CDBG-DR Action Plan, Amendment 1 (Hurricanes Helen and Milton)" documents, which are available on Lee County's website:

<https://cdbgdr.leegov.com/>

Lee County plans the following CDBG-DR expenditures during the 2025 program year, sourced from allocations from Hurricane Ian and Hurricanes Helene and Milton. These expenditures are summarized below:

Administrative Costs - \$7,000,000 (Administrative costs to ensure compliant implementation of CDBG-DR programs. No national objective required.)

Recovery and Resiliency Planning - \$14,000,000 (Planning to support recovery and community wide resiliency. No national objective required.)

Rehabilitation, Reconstruction, and Elevation - \$143,013,400 (Assistance to income qualified homeowners to make necessary repairs, reconstruction or elevate homes impacted by hurricanes. LMH Activity.)

Home Purchase Assistance – \$2,000,000 (Assistance to income qualified homebuyers to purchase eligible housing units. LMH Activity.)

Single Family Housing Development - \$45,000,000 (Development of new affordable single-family housing for purchase by income eligible households. LMH Activity.)

Multi-Family Housing Development - \$263,000,000 (Development and rehabilitation of affordable multi-family housing units. LMH Activity.)

Public Services - \$27,202,450 (Long Term Recovery Group – direct public services for hurricane impacted residents. LMC activity.)

Critical Infrastructure - \$382,533,000 (Critical Infrastructure activities to include public utilities, public facilities, and HMGP match. Urgent Need Activity.)

AP-38 Project Summary

Project Summary Information

Table 8 – Project Summary Information

1	Project Name	CDBG Program Administration
	Target Area	N/A
	Goals Supported	Non-Goal Program Administration
	Needs Addressed	N/A
	Funding	CDBG: \$520,059
	Description	Planning and administration of Lee County's federally funded CDBG program
	Target Date	9/30/2026
	Estimate the number and type of families that will benefit from the proposed activities	Other: 0 Other
	Location Description	Lee County Human & Veteran Services (Fort Myers, FL)
	Planned Activities	Activities for planning and administration of the CDBG program (incl. general administration). CDBG funding summary: \$490,059 from 2025 formula allocation and \$30,000 from program income. Program income is estimated amount. *Target Areas Included: Not applicable (N/A). [Program Administration] **Priority Needs Addressed: N/A.
2	Project Name	HOME Program Administration
	Target Area	N/A

	Goals Supported	Non-Goal Program Administration
	Needs Addressed	N/A
	Funding	HOME: \$381,006
	Description	Planning and administration of Lee County's federally funded HOME program
	Target Date	9/30/2026
	Estimate the number and type of families that will benefit from the proposed activities	Other: 0 Other
	Location Description	Lee County Human & Veteran Services (Fort Myers, FL)
	Planned Activities	Activities for planning and administration of the HOME program (incl. general administration). HOME funding summary: \$95,381 from 2025 formula allocation and \$285,625 from prior-year resources. Prior-year resources are estimated amounts. *Target Areas Included: Not applicable (N/A). [Program Administration] **Priority Needs Addressed: N/A.
3	Project Name	HOME Housing Development
	Target Area	N/A
	Goals Supported	Affordable Housing Construction, Rehabilitation, and Assistance
	Needs Addressed	New Construction and Rehabilitation for Affordable Housing
	Funding	HOME: \$1,645,466
	Description	Acquisition and rehabilitation or new construction of housing units
	Target Date	9/30/2026

	Estimate the number and type of families that will benefit from the proposed activities	Rental Units Constructed: 1 Household/Housing Units; Homeowner Housing Added: 2 Household/Housing Units
	Location Description	Lee County
	Planned Activities	This project will consist of the acquisition and rehabilitation or new construction of 3 housing units. HOME funding summary: \$171,688 from 2025 formula allocation and \$1,473,778 from prior-year resources. Prior-year resources are estimated amounts. *Target Areas Included: Not applicable (N/A). [Countywide]
4	Project Name	HOME Downpayment Assistance
	Target Area	N/A
	Goals Supported	Affordable Housing Construction, Rehabilitation, and Assistance
	Needs Addressed	Rental and Down Payment Assistance
	Funding	HOME: \$776,698
	Description	Downpayment assistance
	Target Date	9/30/2026
	Estimate the number and type of families that will benefit from the proposed activities	Direct Financial Assistance to Homebuyers: 8 Households Assisted
	Location Description	Lee County

	Planned Activities	This project will provide down payment assistance to eligible home buyers in Lee County. HOME funding summary: \$300,000 from 2025 formula allocation and \$476,698 from prior-year resources. Prior-year resources are estimated amounts. *Target Areas Included: Not applicable (N/A). [Countywide]
5	Project Name	HOME Tenant-Based Rental Assistance (TBRA)
	Target Area	N/A
	Goals Supported	Affordable Housing Construction, Rehabilitation, and Assistance
	Needs Addressed	Rental and Down Payment Assistance
	Funding	HOME: \$581,055.26
	Description	Tenant-based rental assistance (TBRA)
	Target Date	9/30/2026
	Estimate the number and type of families that will benefit from the proposed activities	Tenant-based rental assistance/Rapid Rehousing: 9 Households Assisted
	Location Description	Lee County
	Planned Activities	This project will provide tenant-based rental assistance in support of 9 households. HOME funding summary: \$386,755 from 2025 formula allocation, \$64,300 from program income, and \$130,000 from prior-year resources. Program income and prior-year resources are estimated amounts. *Target Areas Included: Not applicable (N/A). [Countywide]
6	Project Name	CDBG Owner Occupied Housing Rehabilitation and Delivery
	Target Area	N/A
	Goals Supported	Affordable Housing Construction, Rehabilitation, and Assistance

	Needs Addressed	New Construction and Rehabilitation for Affordable Housing
	Funding	CDBG: \$600,000
	Description	Rehabilitation or reconstruction of housing units
	Target Date	9/30/2026
	Estimate the number and type of families that will benefit from the proposed activities	Homeowner Housing Rehabilitated: 14 Household Housing Units
	Location Description	Lee County and Lee County Human & Veteran Services (Fort Myers, FL)
	Planned Activities	This project will target the rehabilitation or reconstruction of housing units and includes funds to support staff salaries and other costs for housing rehabilitation or reconstruction. CDBG funding summary: \$600,000 from 2025 formula allocation. *Target Areas Included: Not applicable (N/A). [Countywide]
7	Project Name	CDBG Public Services
	Target Area	N/A
	Goals Supported	Public Services and Homeless/Special Needs Services
	Needs Addressed	Public Services; Public Safety/Crime Prevention
	Funding	CDBG: \$386,650
	Description	Services that help prevent homelessness and promote community engagement
	Target Date	9/30/2026
	Estimate the number and type of families that will benefit from the proposed activities	Public Service activities other than Low/Moderate Income Housing Benefit: 11,000 Persons Assisted

	Location Description	Lee County
	Planned Activities	This project will provide services and other activities that help prevent homelessness and promote community engagement, which may include, but is not limited to, community and neighborhood policing. CDBG funding summary: \$386,650 from 2025 formula allocation. *Target Areas Included: Not applicable (N/A). [Countywide]
8	Project Name	CDBG Non-Profit Capital Improvements/Public Facility/Infrastructure
	Target Area	Low- and Moderate-Income Areas (LMA)
	Goals Supported	Shelter, Public Facility, and Infrastructure Improvements
	Needs Addressed	Homeless/Special Needs Housing and Shelter; Public Facility Improvements; Public Infrastructure Improvements
	Funding	CDBG: \$3,091,226
	Description	Acquisition or capital improvements for non-profit organization or public facility
	Target Date	9/30/2026
	Estimate the number and type of families that will benefit from the proposed activities	Other: 2 Other [Facilities]
	Location Description	Lee County
	Planned Activities	This project will support the acquisition of, or an infrastructure improvement project for, a non-profit organization or public facility that serves low/moderate income persons. CDBG funding summary: \$1,061,785 from 2025 formula allocation and \$2,029,441 from prior-year resources. Prior-year resources are estimated amounts. *Target Areas Included: Low- and Moderate-Income Areas (LMA).
	Project Name	CDBG Urban County Projects

9	Target Area	N/A
	Goals Supported	Urban County Needs
	Needs Addressed	Public Services; Public Facility Improvements; Public Infrastructure Improvements
	Funding	CDBG: \$1,524,036
	Description	CDBG-eligible projects benefiting Urban County communities
	Target Date	9/30/2026
	Estimate the number and type of families that will benefit from the proposed activities	Other: 1 Other [Project]
	Location Description	City of Sanibel, City of Bonita Springs, Town of Fort Myers Beach, and Village of Estero, FL
	Planned Activities	Planned activities to be dictated by project eligibility and available funding. CDBG funding summary: \$506,217 from 2025 formula allocation and \$1,017,819 from prior-year resources. Prior-year resources are estimated amounts. *Target Areas Included: Not applicable (N/A). [Urban County]
10	Project Name	ESG25 Lee County
	Target Area	N/A
	Goals Supported	Non-Goal Program Administration; Public Services and Homeless/Special Needs Services
	Needs Addressed	Public Services
	Funding	ESG: \$274,830 ESG-RUSH: \$50,000
	Description	Homeless services, including rental assistance/rapid rehousing or supportive shelter and mental health services

	Target Date	9/30/2026
	Estimate the number and type of families that will benefit from the proposed activities	Homeless Person Overnight Shelter: 6,500 Persons Assisted [Street Outreach]; Tenant-based Rental Assistance/Rapid Rehousing: 4 Households Assisted (ESG) Public Service activities other than Low/Moderate Income Housing Benefit: 30 Persons Assisted; Tenant-based Rental Assistance/Rapid Rehousing: 1 Household Assisted (ESG-RUSH)
	Location Description	Lee County Human & Veteran Services (Fort Myers, FL)
	Planned Activities	Project funds will be used to provide rental assistance/rapid rehousing for persons who are experiencing homelessness or at-risk of homelessness, street outreach services, supportive shelter and mental health services, and program administration. ESG funding summary: \$274,830 from 2025 formula allocation. ESG-RUSH funding summary: \$50,000 from prior-year resources. Prior-year resources are estimated amounts. *Target Areas Included: Not applicable (N/A). [Countywide]

AP-50 Geographic Distribution – 91.220(f)

Description of the geographic areas of the entitlement (including areas of low-income and minority concentration) where assistance will be directed

Lee County will continue to focus the expenditure of CDBG funds in eligible low- and moderate-income areas (LMA) and for activities that benefit low- and moderate-income individuals (LMI) outside of these areas. For the 2025 program year, Lee County has programed 34.87% of its CDBG allocation toward public improvements in eligible LMA neighborhoods (see **Table 9**).

*34.87% of CDBG Allocation

CDBG funds, however, will be used in unincorporated Lee County and Urban County communities (City of Sanibel, City of Bonita Springs, Town of Fort Myers Beach, and Village of Estero), based on LMA neighborhood eligibility.

HOME and ESG funds will be used anywhere in unincorporated Lee County and Urban County communities.

Geographic Distribution

Target Area	Percentage of Funds
Low- and Moderate-Income Areas (LMA)	35%

Table 9 - Geographic Distribution

Rationale for the priorities for allocating investments geographically

Lee County attempts to balance its use of federal and state funds to assist low- and moderate-income individuals and families living in impacted areas, but to also provide housing and public services outside of such areas and to special needs populations presumed to be low- or moderate-income. Housing rehabilitation and public services will be disbursed based on income eligibility rather than geographic location to provide opportunities throughout unincorporated Lee County based on individual or household need.

Lee County also abides by its Urban County designation, and coordinates with partner municipalities through Urban County agreements, to fund projects in the City of Sanibel, City of Bonita Springs, Town of Fort Myers Beach, and Village of Estero. Otherwise, funding is allocated to projects in unincorporated Lee County based on income eligibility, whether area or client based as defined by HUD.

Discussion

Currently, Lee County has only one designated “Target Area” that corresponds to HUD-designated Low- and Moderate-Income Areas (LMA). Lee County has identified 10 projects to implement the goals of the Strategic Plan during the second program year (2025) of the 2024-2028 Consolidated Plan. These projects benefit low- and moderate-income persons in unincorporated Lee County and within eligible

low- and moderate- income areas of the County. Only capital improvements (i.e., public facility and infrastructure improvements) are location dependent, and therefore must meet LMA criteria by being located in Lee County's Low- and Moderate-Income Areas (LMA) Target Area. Projects with countywide benefit (i.e., no Target Area) include downpayment assistance, housing rehabilitation/project delivery, public services, and administration of the grant programs.

Affordable Housing

AP-55 Affordable Housing – 91.220(g)

Introduction

Affordable housing will be provided primarily through CDBG and HOME funding. Additional matching funding sources for affordable housing may include State Housing Initiatives Partnership (SHIP) funding (State funding) if available. SHIP funds may be used to provide down payment assistance for qualified buyers or to supplement affordable housing development. Lee County will also continue to search for additional funding from other sources to support the development of affordable housing units.

One Year Goals for the Number of Households to be Supported	
Homeless	5
Non-Homeless	34
Special-Needs	0
Total	39

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

One Year Goals for the Number of Households Supported Through	
Rental Assistance	14
The Production of New Units	3
Rehab of Existing Units	14
Acquisition of Existing Units	8
Total	39

Table 11 - One Year Goals for Affordable Housing by Support Type

Discussion

Specific to affordable housing, an estimated 38 households will be supported during the 2025 program year, using regular CDBG, HOME, or ESG funding. One (1) household will be supported using ESG-RUSH. The total number of households to be supported during the 2025 program year is 39 households.

Five (5) homeless households will be assisted with ESG or ESG-RUSH rapid re-housing. Another nine (9) non-homeless households will be assisted with Tenant-Based Rental Assistance (TBRA). Three (3) new rental or homeowner housing units will be constructed. An estimated 14 housing units will be rehabilitated, and eight (8) housing units will be acquired through downpayment assistance to be occupied by income-eligible homeowners.

AP-60 Public Housing – 91.220(h)

Introduction

This section of the Annual Action Plan describes what actions Lee County will take during the 2025 program year to carry out the public housing strategy identified in the Strategic Plan.

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

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

Due to a lack of affordable housing options, there is a great demand for public housing units and housing choice vouchers. This has resulted in a significant waiting list for both types of housing, which is regularly closed. The Public Housing waitlists open one (1) time per year for a two (2) week period. During this two (2) week period, it is likely that over 2,000 names will be placed on the waitlists. Waitlists are monitored throughout the year to ensure they are opened as often as needed.

HACFM is currently undertaking the “Greater Dunbar Initiative,” a massive redevelopment of the Southward Village complex. The Greater Dunbar Initiative will address the needs of residents in the 199-unit Southward Village public housing community with improved opportunities. Specifically, the transformed Southward Village site will include 375 new mixed-income apartments, of which 159 will be reserved for Southward Village residents. An additional 40 homes will be available at a 92-unit development on Cleveland Avenue. All housing will be supported with new infrastructure and complemented with amenities including a clubhouse, fitness center, business center, parks, and playgrounds throughout the revitalized village. Construction will be completed by Spring 2026. In addition to redevelopment activities, HACFM and Southwest Florida Affordable Housing Choice Foundation continue to work on CDBG-DR rehabilitation projects of existing affordable housing units and new construction projects located within Lee County.

HACFM continues to promote a safe living environment for all residents. HACFM continues to partner and works with the local police department to add enhanced security at all properties. HACFM works cooperatively with Lee County and the Continuum of Care and private entities in the provision of subsidized housing within Lee County. HACFM administers the Housing Choice Voucher (HCV) program that provides financial rental assistance to eligible individuals and families based upon income. Through HACFM nonprofit affiliate Southwest Florida Affordable Housing Choice Foundation, Inc, who provides affordable housing options throughout Lee County.

During the 2025 program year, Lee County plans to use HOME funds to continue to offer Tenant-Based Rental Assistance (TBRA) to income-eligible households.

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

The Housing Authority of the City of Fort Myers (HACFM) continues to promote current Housing Choice Voucher (HCV) participants to join the HCV Family Self Sufficiency (FSS) program and Homeownership program. The FSS program was designed to connect families receiving subsidized housing assistance with access to community services and resources such as employment training, job-readiness, homeownership education, etc. necessary to advance families toward self-sufficiency. HACFM also continues to offer a Community Supportive Services (CSS) program for residents. The purpose of the CSS program is to provide support services such as job-skills training, childcare, transportation, and adult/youth education programs. Support services are vital in transitioning families into self-sufficiency.

HACFM continues to increase its number of HCV Homeownership Vouchers. HACFM continues to encourage interested residents to participate in the HCV FSS program offered at HACFM. HACFM continues to offer strategies to encourage homeownership, as well as financial literacy and budget classes to all HCV clients. HACFM continues to believe that families with more education and control over money will be able to provide more for themselves, while potentially moving toward homeownership. As a HUD certified housing counseling agency, HACFM provides an array of housing counseling services for public housing and Section 8 residents through the FSS program. Counseling services include but not limited to: Home Buyer Education classes, debt reductions, budgeting, credit restoration, mortgage qualifications, foreclosure prevention, pre- and post-purchase counseling, in addition to assistance to renters. HACFM has a Senior Services Coordinator on staff to assist with senior services of varying degrees.

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

Neither HACFM nor LCHA is designated as troubled.

Discussion

Affordable housing needs are met by multiple service providers in the Lee County area. HACFM and Continuum of Care currently administer public housing units and tenant-based vouchers (HCVs). The HACFM and Continuum of Care will continue to administer vouchers and will ensure that residents are housed in coordination with other housing providers. The County will continue to coordinate referrals with HACFM, LCHA and greater Continuum of Care to connect low-income residents with housing options.

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

Introduction

Lee County, the Continuum of Care, and local foundations, non-profit public service providers, and religious organizations, work together to develop and implement a comprehensive strategy to address homelessness. These efforts include the Point-in-Time Count, street outreach activities, and other supportive services for persons experiencing homelessness or at-risk of homelessness.

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

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

The outreach to homeless persons is conducted at community events such as the Point-in-Time Count and the Stand Down/Service Day, and by the many caseworkers at community agencies including, the U.S. Department of Veterans Affairs, Lee County Homeless Coalition, Community Cooperative, Salvation Army, Centerstone, schools, and other entities that encounter individuals and families who are homeless during service delivery or during their regular course of business. The Continuum of Care has also developed and implemented a coordinated assessment process to better address needs, target resources, and ensure engagement with services is more efficient for persons who are homeless. Needs are assessed through the coordinated assessment process during various points of contact at community agencies and through outreach events. Lee County Human & Veteran Services implemented a street outreach program six (6) years ago that focuses on engaging persons experiencing unsheltered homelessness, completing Coordinated Assessment, and linking those persons with housing and supportive services.

Data is also obtained from Lee County's outreach workers. Outreach staff with Lee County Human & Veteran Services, Community Assisted and Supported Living, Centerstone, St. Vincent de Paul, Jewish Family & Children Services, and the Lee County HOT Team engage persons experiencing unsheltered homelessness, and work to connect them to housing and supportive services. HMIS data from fiscal year 2024 indicates a total of 3,141 households comprised of 4,965 individuals entered Lee County's Coordinated Entry (CE) system. Of these households, 638 (20%) were families with children, 1299 (41%) were single male households, and 951 (30%) were single female households. However, 23% of households (715) were either active in an emergency shelter at the time of entry into Coordinated Entry or were able to access shelter post-entry into Coordinated Entry.

Addressing the emergency shelter and transitional housing needs of homeless persons

The closure of the emergency shelter at the Bob Janes Empowerment Center has decreased the number of available beds for emergency shelter in Lee County. St. Matthew's House opened and has provided available beds for emergency shelter in Lee County. The HOME Tenant-Based Rental Assistance program and Rapid Re-housing program supports the housing needs of individuals and families who are

homeless, by providing a permanent housing solution instead of emergency shelter. As additional funding sources become available, Lee County may engage other community partners for the development of additional projects or programs. Emergency shelter, transitional housing needs and affordable housing needs are priority needs for Lee County and may also be addressed through grant funding opportunities, such as the competitive Continuum of Care process, and through other state or local funding streams.

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

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

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

Helping low-income individuals and families avoid becoming homeless, especially extremely low-income individuals and families and those who are: being discharged from publicly funded institutions and systems of care (such as health care facilities, mental health facilities, foster care and other youth facilities, and corrections programs and institutions); or, receiving assistance from public or private agencies that address housing, health, social services, employment, education, or youth needs.

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

application, assistance, and referral process for persons who are homeless by participating in the coordinated entry process implemented by the Continuum of Care.

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

Discussion

In program year 2025 (i.e., Year 2), Lee County Human & Veteran Services, as the lead entity for the Continuum of Care, will continue to work with the HACFM, LCHA, and the Lee County Homeless Coalition, along with local foundations and other agencies to implement and expand homelessness prevention and assistance measures throughout the county.

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

Introduction:

This section of the Annual Action Plan summarizes actions Lee County will undertake during the program year to reduce barriers to affordable housing.

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

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

Discussion:

Lee County will continue to implement programs to identify barriers to affordable housing. Lee County will continue to work with stakeholders, citizens, and other regional organizations to increase the amount of affordable housing and address the regional impacts and barriers to affordable housing in the County. Lee County, in coordination with other local service providers, plans to undertake the projects and associated activities, as noted in this plan, to address underserved homeless population needs. Lee County's 2019-2028 Continuum of Care Strategic Plan outlines the goals and objectives the Continuum of Care plans to carry out to ensure that homelessness in Lee County is rare, brief, and nonrecurring.

AP-85 Other Actions – 91.220(k)

Introduction:

This section of the plan describes the actions that Lee County will take to carry out the following strategies in the Consolidated Plan:

- Affordable Housing Construction, Rehabilitation, and Assistance
- Public Services and Homeless/Special Needs Services
- Shelter, Public Facility, and Infrastructure Improvements
- Emergency/Urgent Needs and Disaster Recovery
- Urban County Needs
- Non-Goal Program Administration

Actions planned to address obstacles to meeting underserved needs

Lee County, in coordination with other local service providers, plans to undertake the projects and associated activities, as noted in this plan, to address underserved needs such as lack of affordable housing, payment assistance, various types of counseling, education, public safety, shelters, public services and facilities, infrastructure, economic development and non-profit capital improvements. Projects and activities such as these are not anticipated to encounter obstacles during completion.

Public comments indicate a significant need for additional affordable housing units. Lee County intends to undertake multiple projects to facilitate the development of additional affordable housing units. Obstacles to these projects may include limited availability of units to be acquired or rehabilitated and limited resources available to complete projects. Lee County will ensure that identified units are suitable for affordable housing development through underwriting and coordination with community partners and other county departments, as required.

Actions planned to foster and maintain affordable housing

Actions planned include using CDBG, HOME, and State SHIP funds to provide owner occupied housing rehabilitation assistance and down payment assistance. In addition, HOME funds are being allocated for tenant-based rental assistance and CHDO housing development to facilitate the development of additional affordable housing units. Lee County has implemented, and plans to continue, the HOPWA Tenant Based Rental Assistance Program (TBRA). Partnerships with the Public Housing Authorities and other local housing providers will provide additional resources to foster and maintain affordable housing through new construction, rehabilitation, and referral to currently available units.

Lee County Human & Veteran Services regularly shares information about Fair Housing during its interactions with housing providers and the public. Over the past year, Human & Veteran Services has distributed Fair Housing flyers and maintained a Fair Housing banner on the County's Human & Veteran Services Reach App and Human & Veteran Services Fair Housing website. This information is shared not only at the department, but also offsite by setting up a table and distributing material at the Public

Library. Human & Veteran Services actively works to provide accessible Fair Housing information and outreach.

Actions planned to reduce lead-based paint hazards

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

Actions planned to reduce the number of poverty-level families

Lee County Human & Veteran Services provides anti-poverty action by working with neighborhoods to coordinate resources for employment and self-sufficiency programs. Antipoverty efforts of the Family Impact program and the Community Supportive Services Center (CSS) (through HACFM) consist of homeless programs, emergency assistance (rental, mortgage, and utility payments), housing and financial counseling, case management, and educational services. Educational services are an allowable cost; however, CSBG funds are utilized by Human & Veteran Services for homelessness prevention. Participants maintain close contact with case management staff and receive individual supportive services if necessary to ensure successful completion of the programs and long-term self-sufficiency. Additional antipoverty efforts include funding state mandated programs for substance abuse, mental health, Medicaid, and indigent medical care. Lee County provides additional funds, beyond the state requirements, to increase levels of services, including funding for specialty courts, such as Veterans Treatment Court.

Actions planned to develop institutional structure

Institutional structure is not deemed lacking. Gaps in providing programs or services that meet the priority needs will be evaluated on an annual basis, but at the onset of this planning cycle, there are no identified gaps to implementation. Continued coordination will help to ensure an effective institutional structure.

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

service agencies

Lee County works to bring together different groups and agencies, including private housing and social service agencies, when appropriate for both specific projects and for overall planning. In addition, the County works with local housing agencies to leverage resources to meet housing, infrastructure, and other service needs throughout the county. Human & Veteran Services is currently partnering with the Public Housing Authorities and local service providers to utilize existing and apply for additional HUD Mainstream Vouchers which will facilitate enhanced collaboration among service providers.

As the lead agency for the Continuum of Care, Lee County Human & Veteran Services in coordination with other agencies, plans to undertake the projects and associated activities, as noted in this plan, to address underserved needs such as lack of affordable housing, payment assistance, various types of counseling, education, public safety, shelters, public services and facilities, infrastructure, economic development and non-profit capital improvements.

Discussion:

Lee County is committed to continuing its participation and coordination with Federal, State, local governments, and other agencies, along with the public and private sectors, to serve the needs of income-eligible individuals and families in the community. In particular, the Lee County Human & Veteran Services will continue to closely coordinate with Lee County departments and Urban County jurisdictions regarding housing and community development initiatives.

Program Specific Requirements

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

Introduction:

The following describes the program specific requirements of Lee County's federal funding sources, including CDBG, HOME, and ESG.

Community Development Block Grant Program (CDBG)

Reference 24 CFR 91.220(l)(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	\$30,000
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:	\$30,000

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.	91.51%

HOME Investment Partnership Program (HOME)
Reference 24 CFR 91.220(I)(2)

1. A description of other forms of investment being used beyond those identified in Section 92.205 is as follows:

Not applicable.

2. A description of the guidelines that will be used for resale or recapture of HOME funds when used for homebuyer activities as required in 92.254, is as follows:

Lee County has elected to use Recapture as the primary method of ensuring affordability for low-to-moderate income homebuyers; however, resale provisions will be used when HOME funds are provided directly to a developer to reduce the development costs thereby making the price of the home affordable to the buyer. Any recaptured funds will be deposited in a HOME Trust Fund, (depending on original source of funds), to be utilized for any eligible activity within Lee County. The full version of the Lee County Resale and Recapture Policy is available at Human & Veteran Services.

3. A description of the guidelines for resale or recapture that ensures the affordability of units acquired with HOME funds. See 24 CFR 92.254(a)(4) are as follows:

Any recaptured funds will be deposited in a HOME Trust Fund (depending on original source of funds) to be utilized for any eligible activity within Lee County, expanding the number of affordable housing units. Depending on the circumstances of recapture, the affordability of the units may be waived (such as the case in a foreclosure). In the case of resale, the unit will be resold to an eligible buyer, preserving affordability. The full version of the Lee County Resale and Recapture Policy is available at Human & Veteran Services.

4. Plans for using HOME funds to refinance existing debt secured by multifamily housing that is rehabilitated with HOME funds along with a description of the refinancing guidelines required that will be used under 24 CFR 92.206(b), are as follows:

Not applicable.

5. If applicable to a planned HOME TBRA activity, a description of the preference for persons with special needs or disabilities. (See 24 CFR 92.209(c)(2)(i) and CFR 91.220(I)(2)(vii)).

Lee County's Coordinated Entry system identifies and prioritizes service needs for individuals and families seeking placement in Rapid Rehousing programs as follows:

1. **Parents with Children:** The first prioritization factor targets households with children experiencing homelessness. This score is based on the number of children indicated on the Households Housing Needs Assessment.
 2. **Household member 60 years of age or older:** The second prioritization factor targets individuals who are 60 years of age or older. This score is based on the household member's date of birth as recorded in HMIS.
 3. **Fleeing Domestic Violence:** The third prioritization criteria will expedite placement for individuals and families who meet HUD's definition of Category 2 homelessness. This score is based on household member's responses on the Coordinated Assessment screen in HMIS.
 4. **Veteran Status:** The fourth prioritization criteria will expedite placement into housing for individuals who have served at least one day of active duty in the United States Armed Forces, or who were disabled during a period of active-duty training. This score is based on household members' responses on the Client Enters Project screen in HMIS.
 5. **First Time Homeless:** The fifth prioritization criteria will target individuals and families who are homeless for the first time as recorded on the Client Enters Project screen in HMIS.
6. If applicable to a planned HOME TBRA activity, a description of how the preference for a specific category of individuals with disabilities (e.g. persons with HIV/AIDS or chronic mental illness) will narrow the gap in benefits and the preference is needed to narrow the gap in benefits and services received by such persons. (See 24 CFR 92.209(c)(2)(ii) and 91.220(l)(2)(vii)).

The preference for a specific category of individuals with disabilities in HOME TBRA activities is essential for narrowing the gap in benefits and services received by such persons. By strategically targeting resources and support, this preference contributes to enhancing the quality of life and independence of individuals with disabilities.

7. If applicable, a description of any preference or limitation for rental housing projects. (See 24 CFR 92.253(d)(3) and CFR 91.220(l)(2)(vii)). Note: Preferences cannot be administered in a manner that limits the opportunities of persons on any basis prohibited by the laws listed under 24 CFR 5.105(a).

While preferences in rental housing projects can be beneficial for addressing specific housing needs, they must be carefully structured and administered to comply with fair housing laws and ensure equitable access to housing opportunities for all eligible individuals and households.

**Emergency Solutions Grant (ESG)
Reference 91.220(l)(4)**

1. Include written standards for providing ESG assistance (may include as attachment)

The existing Lee County Policy and Procedure manual and Continuum of Care Written Standards and Coordinated Entry Policies will be used to outline standards for the ESG rapid re-housing project. Continuum of Care Written Standards and Coordinated Entry Policies are attached to this plan.

In general, eligibility will be determined prior to providing assistance. Applicants must have incomes at or below 50% of the area median income. Households must meet the HUD's definition of homelessness under Category 1, any subsequent Continuum of Care Program Notice of Funding Availability (NOFA) eligibility requirements, and any additional funder eligibility requirements. Once meeting the rapid re-housing eligibility requirements, households are then prioritized by Lee County's target populations.

Income inclusions, income exclusions, and documentation standards can be found in the referenced manual. Verification and documentation of eligibility will be maintained in participant case files. Provided the requirements of each individual self-sufficiency plan are met, eligible households can receive rent assistance for up to 24 months. Exceptions may be made to the duration of assistance after management review and approval.

For the shelter operations component of ESG, standards for assistance will be detailed in the sub recipient provider contract and will stipulate eligible expenditures, beneficiary reporting requirements, and other procedural components of the program.

2. If the Continuum of Care has established a centralized or coordinated assessment system that meets HUD requirements, describe that centralized or coordinated assessment system.

The Coordinated Entry System has three goals:

- To help people move through the homeless service system faster,
- Reduce new entries into homelessness through prevention and diversion resources, and
- Improve data collection and quality to provide accurate information on what assistance consumers need.

The Lee County Continuum of Care has developed a coordinated entry system which uses the existing HMIS system. The process includes the use of a standardized assessment for all individuals, as well as coordinated referral and housing placement processes to ensure that people experiencing homelessness receive appropriate assistance with both immediate and long-term housing and service needs. In addition, monthly meetings are held to ensure especially high-risk clients are linked with the appropriate services. Quarterly planning workshops with outreach workers and service

providers are also held to obtain input on the design and help to secure buy-in for the system. Training for local agencies continues to be provided on an on-going basis as needed. The Continuum of Care Governing Board has reviewed and updated the Coordinated Entry Policies and Procedures in accordance with CPD Notice 17-01.

3. Identify the process for making sub-awards and describe how the ESG allocation is available to private nonprofit organizations (including community and faith-based organizations).

Lee County has determined the programs to receive assistance, and their allocations based on comments received by the public and in consultations during the planning process, as well as staff review of program success to date.

4. If the jurisdiction is unable to meet the homeless participation requirement in 24 CFR 576.405(a), the jurisdiction must specify its plan for reaching out to and consulting with homeless or formerly homeless individuals in considering policies and funding decisions regarding facilities and services funded under ESG.

This requirement has been met.

5. Describe performance standards for evaluating ESG.

Overall evaluation of the ESG program will be undertaken by the Continuum of Care Governing Board. The Governing Board has established the following performance targets for all Continuum of Care and ESG funded projects:

1. 65% of persons in ES, SH, TH, or PH-RRH should be exited to permanent housing destinations
2. 45% of persons in Continuum of Care and ESG funded programs should maintain OR increase their income
3. No more than 35% of persons who were exited from Continuum of Care and ESG funded programs should return to homelessness within 1 year

Performance standards may be evaluated on a project-by-project basis. At minimum, Lee County expects to assist 68 households through HOME and ESG funded re-housing activities. Success of these programs will be measured by examining the beneficiaries served and system performance measures.

Discussion

Lee County anticipates \$30,000 in CDBG program income. The percentage of overall benefit to low- and moderate-income persons is estimated to be 91.51%.