# Executive Summary

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

**1. Introduction**

The Annual Action Plan for FY 2024-2025 provides a description of the activities the City of Palm Bay will undertake from October 1, 2024, through September 30, 2025, to address priority needs and objectives identified in the 5-year Strategic Plan, as presented in the 2022-2027 Consolidated Plan for housing and community development programs. The Action Plan describes the activities undertaken with Community Development Block Grant (CDBG) Entitlement funds granted by HUD but also provides information on the Home Investment Partnerships (HOME) Program and State Housing Initiatives Partnership Program (SHIP) and other sources to address priority needs and objectives identified in the Fiscal Year 2022-2027 Consolidated Plan.  Palm Bay is a direct entitlement community for CDBG funds and is solely responsible for the administration of the funds.

The Brevard County HOME Consortium is a legal entity created through an intergovernmental agreement between Brevard County and the cities of Titusville, Cocoa, Melbourne and Palm Bay.  The Consortium’s mission is to increase the supply of decent, safe and affordable housing for low to moderate income persons living in Brevard County.  As the lead entity, Brevard County receives (HOME) funds on behalf of the Consortium and contracts with each city individually. HOME funds can be used for activities that promote affordable rental housing and homeownership for lower income households, including acquisition, new construction and reconstruction, moderate and substantial rehabilitation, homebuyer assistance and tenant-based rental assistance.

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

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

**Housing:** Preserving existing affordable housing; producing new affordable homes in special areas; mixed-income rental units city-wide; rehabilitation of rental units serving veterans or special needs; providing home ownership opportunities for those who want to own their own home; providing services to educate home buyers regarding the mortgage process; enabling homeowners through education and counseling to retain their home; and demolishing homes that are substandard and unfit for human habitation or commercial properties that are blighted.

**Homeless:** Providing transitional housing to address the increasing population impacted by current real estate market conditions and labor force reductions; establishing facilities for substance abusers, mentally ill, dually diagnosed, and support case management services for ex-offenders; support activities to fill gaps in Brevard County’s Continuum of Care and to respond to urgent community needs; support increased permanent supportive housing and transitional beds for persons with special needs to include housing for victims of domestic violence, unaccompanied homeless youth and homeless veterans.

**Special Needs:** Objectives are to provide facilities to temporarily house chemically dependent or dually diagnosed individuals; support services to youth; support provision of additional independent living facilities with supportive services for the developmentally disabled, mentally ill, physically disabled, and persons with AIDS (including rental assistance for persons with AIDS); rehabilitate facilities providing supportive housing and provide services to enable the elderly to remain in their homes.

**Non-Housing Community Development Needs:** Design and construct comprehensive infrastructure and streetscape improvements, enhance safety and sustainability, support neighborhood-based organizations in sponsoring initiatives and provide other technical assistance as needed. Support the design and construction of neighborhood parks and community centers in the target areas. Construct ADA compliant sidewalks and facilities.

**3. Evaluation of past performance**

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

There have been significant challenges in meeting the proposed outcome numbers described in the previous Action Plan. The COVID-19 pandemic placed an immense amount of strain on the economy, supply chains, and subsequently the progress on goals outlined in the 2023/2024 Action Plan.  An in-depth list of challenges and issues the City faced in meeting goals over the past several years are described below. A few items from that list that had a particularly large impact:

* Cost of labor, materials, and equipment have increased significantly.
* Cost of housing and land have increased significantly.
* Lack of available affordable housing.
* Staffing shortages of contractors, city, and service agencies.
* COVID-19 limited capacity of many service organizations.
* Staff turnover and/or lack of appropriate staffing levels.

Despite the challenges, there was some progress made in expending funds and working towards the goals the City and community committed to during fiscal year (FY) 23/24.. Some notable accomplishments from 2023-2024:

CDBG

* Homeless individuals were provided temporary housing.
* Palm Bay Youth had an opportunity to attend the Youth Enrichment Mentoring Program.
* Domestic Violence Victims received transitional housing services.
* Bus Vouchers were distributed to income eligible residents of the City.
* Palm Bay Seniors were provided nutritional meals.
* Palm Bay Youth received school supplies.
* Palm Bay Seniors received legal advice.

CDBG CV

* Seniors received free transportation and home delivery, Brevard Alzheimer’s Foundation, Inc.
* Residents received rental/mortgage and utility assistance.
* Seniors received tenant counselling and attended tenant workshops.
* Palm Bay Youth receive after school tutoring/mentoring.

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

Summary from citizen participation section of plan.

The Citizen Participation Plan (CPP) sets the guidelines for how the City will give opportunities to residents and stakeholders to provide input into the Consolidated Plan. The adopted CPP is pursuant to 24CFR 91.105.

Public outreach efforts were conducted, including advertising in the local paper, public meetings and public hearings to determine housing and non-housing community development needs, pursuant to the Citizen Participation Plan. During the public comment period, copies of the draft Annual Action Plan were available online, and at the Community and Economic Development Department office.

**5. Summary of public comments**

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

The City of Palm Bay allows several opportunities for public comment. As required by the adopted Citizen Participation Plan, the City publicly notices the Public Hearing for development of the Annual Action Plan, which provides an opportunity for citizens to provide comments and inquiries to the City. During the first public hearing, the following comments were received:

CDBG Funding

1. Esther Theological spoke to appeal the decision of the Community Development Advisory Board to deny their application for CDBG funding.

There were no public comments received during the second public hearing.

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

There were no public comments or views not accepted.

**7. Summary**

The City is involved with multiple agencies and community groups serving the needs of the low- and moderate-income persons and as such, there is much opportunity for the City to receive information about issues affecting the low-income community. The City also hears issues through monthly meetings of the Community Development Advisory Board and residents can attend these meetings and provide feedback on needs in the community.

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

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

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

| **Agency Role** | **Name** | **Department/Agency** |
| --- | --- | --- |
| Lead Agency | PALM BAY |  |

|  |  |  |
| --- | --- | --- |
| CDBG Administrator | PALM BAY | Community & Economic Development Department |
| HOPWA Administrator |  | Florida Department of Health |
|  |  |  |

Table 1 – Responsible Agencies

**Narrative**

The City of Palm Bay is a direct entitlement community for Community Development Block Grant (CDBG) funds. However, this is not the case with the HOME funds. The City of Palm Bay, in partnership with Brevard County and the cities of Melbourne, Cocoa, and Titusville receives HOME funds through a consortium. The Brevard County HOME Consortium brings together the cities and the unincorporated areas of the County.

**Consolidated Plan Public Contact Information**

City of Palm Bay

Community and Economic Development

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

**1. Introduction**

The City recognizes the benefit of engaging with stakeholders, partners, neighborhoods directly impacted by programs, governmental boards and committees, and other organizations engaged in similar work is an essential component in the development of the Annual Action Plan.  The City's participation process began with holding public meetings and/or hearings. This approach provides for a range of opportunities for citizens to participate in the process.  This engagement is beneficial to both the City that administers the programs as well as the public and partners because it creates a clear sense of needs and established goals to address those needs. This coordination creates buy-in for proposed projects and develops a shared vision/path for the use of the HUD funds described in this plan.

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

The City of Palm Bay is one of 133 member agencies and individuals comprising the Brevard County homeless Continuum of Care (CoC). Member agencies include other government organizations, the area’s Federally Qualified Health Center (FQHC), homeless service providers, behavioral and mental health providers, hospital systems, public housing authorities, among others. The Brevard Homeless Coalition (BHC) provides administrative oversight of the Brevard CoC. City of Palm Bay representatives attend the 4 quarterly meetings of the CoC, including an annual general membership meeting. During the quarterly meetings, member agencies and individuals have the opportunity to learn about homeless system related programs/projects from BHC staff and guest speakers, share strategies, and to connect with housing and other direct services providers.

**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.**

As one of the entitlement jurisdictions within Brevard County, the City has a standing seat on the CoC Advisory Council. The CoC Advisory Council is the leadership body for the general membership, and in 2023 voted to approve the 2023-2026 Housed and Healthy Brevard Strategic Plan. The strategic plan lays out a vision and action steps to make homelessness rare, brief and non-recurring through five core tenets: *Strengthening* the core of the CoC; *Preventing* first time homelessness; *Reducing* the numbers of those experiencing homelessness; *Building* more affordable housing, Permanent Supportive Housing units, and emergency shelter capacity; and s*haring* Brevard’s story of our homeless residents through quality data measurements and learnings from those with Lived Experience. As the largest City in south Brevard, Palm Bay serves an active role in executing the strategic plan

**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 a component of serving as the leadership body for the CoC general members, the CoC Advisory Council is also tasked with creating recommendations for funding allocations of State Emergency Solutions Grant (ESG) and Federal funds for projects directly impacting those in homelessness. The BHC, as the CoC lead agency and collaborative applicant, brings forth for consideration these agency funding proposals to the Advisory Council. Therefore, the City is directly involved with guiding the allocation of ESG funding. Additionally, as part of the CoC Advisory Council, City representatives have the opportunity to lead or participate in CoC Standing Committees such as the Data and Performance Measures Committee. This Committee ties directly into policies and procedures for the CoC’s Homeless Management Information System (HMIS) as it relates to data quality and determining appropriate metrics for analysis of CoC operations.

**2. Agencies, groups, organizations and others who participated in the process and consultations**

Table 2 – Agencies, groups, organizations who participated

|  |  |  |
| --- | --- | --- |
| 1 | **Agency/Group/Organization** | City of Palm Bay |
| **Agency/Group/Organization Type** | Other government - Local |
| **What section of the Plan was addressed by Consultation?** | Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Homelessness Strategy Non-Homeless Special Needs |
| **Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?** | The City led stakeholder meetings and Public Hearings whereby the agencies could provide input. |
| 2 | **Agency/Group/Organization** | Brevard Homeless Coalition |
| **Agency/Group/Organization Type** | Services-homeless |
| **What section of the Plan was addressed by Consultation?** | Housing Need Assessment Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Homelessness Strategy |
| **Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?** | The City participated in several public meetings with Brevard Homeless Coalition to discuss priority needs in the Community. |
| 3 | **Agency/Group/Organization** | Catholic Charities of Central Florida, Inc. |
| **Agency/Group/Organization Type** | Services-homeless |
| **What section of the Plan was addressed by Consultation?** | Housing Need Assessment Services - Homeless Prevention Program |
| **Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?** | The organization attended a Public Hearing on March 21, 2024. Their program seeks to assist low-income households at risk of homelessness with rent/mortgage and utility payments. |
| 4 | **Agency/Group/Organization** | Brevard Alzheimer's Foundation |
| **Agency/Group/Organization Type** | Services-Elderly Persons |
| **What section of the Plan was addressed by Consultation?** | Non-Homeless Special Needs |
| **Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?** | The organization attended a Public Hearing on March 21, 2024. Their program seeks to provide non-emergency medical transportation for seniors in Palm Bay. |
| 5 | **Agency/Group/Organization** | Greater Melbourne Police Athletic League |
| **Agency/Group/Organization Type** | Services-Education |
| **What section of the Plan was addressed by Consultation?** | Non-homeless |
| **Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?** | The organization attended a Public Hearing on March 21, 2024. The program seeks to provide a youth enrichment mentoring program. |
| 6 | **Agency/Group/Organization** | CENTER FOR THE VISUALLY IMPAIRED, INC. |
| **Agency/Group/Organization Type** | Services-Children Services-Elderly Persons Services-Persons with Disabilities |
| **What section of the Plan was addressed by Consultation?** | Non-Homeless Special Needs |
| **Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?** | The organization attended a Public Hearing on March 21, 2024. The program seeks to provide supportive services for blind and visually impaired residents. |

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

All entities were considered for consultation and no entity was purposefully excluded from providing input.

**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 | Brevard Homeless Coalition (BHC) | The CoC strategic plan to address homelessness informs the City of their goals and strategies. |
| SHIP Local Housing Assistance Plan | City of Palm Bay | The Plan identifies housing strategies allowing the City to create partnerships that produce and preserve affordable homeownership and multifamily housing. |
| Comprehensive Plan Housing Element | City of Palm Bay | The Housing Element is the City's chief policy document for the development of affordable and market rate housing. |

Table 3 - Other local / regional / federal planning efforts

**Narrative**

## AP-12 Participation - 91.401, 91.105, 91.200(c)

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

**Summarize citizen participation process and how it impacted goal-setting**

The City encourages the public to review documents concerning the CDBG Program and provide feedback. Community stakeholders were notified of funding and emailed from a database of interested parties. Notification was posted in the Florida Today, a local newspaper on November 30, 2023, to advise the public and public service organizations of CDBG anticipated funding for FY 24/25.  One public meeting was conducted on February 21, 2024, to discuss the CDBG and HOME programs and to accept recommendations for goals and activities during the Community Development Advisory Board Meeting.  Two (2) public hearings were held, the first on March 21, 2024, and the second and final public hearing on July 18, 2024, to receive comments on the City's proposed Action Plan. All public meetings and hearings were held at Palm Bay City Hall Council Chambers, prior to adoption of Plan by City Council. Project funding was approved by the City of Palm Bay City Council on March 21, 2024.   The PY 24 Annual Action Plan was made available for public comment for 30 days from May 28, 2024, through July 18, 2024.

**Citizen Participation Outreach**

| **Sort Order** | **Mode of Outreach** | **Target of Outreach** | **Summary of**  **response/attendance** | **Summary of**  **comments received** | **Summary of comments not accepted and reasons** | **URL (If applicable)** |
| --- | --- | --- | --- | --- | --- | --- |
| 1 | Public Meeting | Minorities   Non-English Speaking - Specify other language: Spanish, Creole   Persons with disabilities   Non-targeted/broad community | Staff held its monthly Community Development Advisory Board meeting on February 21, 2024. Public service agency representatives who applied for funding were in attendance. | Representatives from public service agencies were present to answer any questions. No comments were received, other than discussion and proposed recommendations by the City's Community Development Advisory Board. | No comments were not accepted. |  |
| 2 | Public Hearing | Minorities   Non-English Speaking - Specify other language: Spanish, Creole   Persons with disabilities   Non-targeted/broad community | Eight (8) agencies were in attendance. | Representatives from public service agencies were present to answer any questions at the 1st Public Hearing held on March 21, 2024. See attached Citizen Participation Comments. | No comments were not accepted. |  |

Table 4 – Citizen Participation Outreach

# Expected Resources

## AP-15 Expected Resources - 91.420(b), 91.220(c)(1,2)

**Introduction**

The following table describes the federal resources from HUD made available to the City of Palm Bay for the 2024 Program Year. The CDBG funds will support non-housing community development of the City. The HOME funds address housing needs within the Brevard County HOME Consortium area which includes the City of Palm Bay. The table includes the annual allocation, any prior year resources not expended before the 2024 program year, and then any program income. The “Expected Amount Available Remainder of Con Plan” column is an estimate of the number of total resources to be made available from HUD for program years 2024 through 2026.

**Anticipated Resources**

| **Program** | **Source of Funds** | **Uses of Funds** | **Expected Amount Available Year 1** | | | | **Expected Amount Available Remainder of ConPlan**  **$** | **Narrative Description** |
| --- | --- | --- | --- | --- | --- | --- | --- | --- |
| **Annual Allocation: $** | **Program Income: $** | **Prior Year Resources: $** | **Total:**  **$** |
| CDBG | public - federal | Acquisition Admin and Planning Economic Development Housing Public Improvements Public Services | 776,641 | 0 | 674,384 | 1,451,025 | 1,553,282 | Community Development Block Grant (CDBG) funds will be used for housing, parks renovations, sidewalks, and public improvements, public services, admin and planning. |

Table 1 - 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**

CDBG and HOME funds are used to leverage additional funding to address the needs outlined in this plan. While there is no match requirement for the use of CDBG funds, there is a requirement for local match when using HOME funds. To satisfy the 25% local match for HOME funds, the City primarily uses the State Housing Initiatives Partnership (SHIP) program. For the 2024-2025 program year, the City anticipates receiving a total of $1,455,800 in SHIP funding; well above the 25% match requirement.

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

The City of Palm Bay will use all available funds and seek additional resources to address the needs identified in the plan. The City has a surplus property policy that allows publicly owned land to be used to address the housing needs identified in this plan.

**Discussion**

See above.

# Annual Goals and Objectives

**AP-20 Annual Goals and Objectives - 91.420, 91.220(c)(3)&(e)**

**Goals Summary Information**

| **Sort Order** | **Goal Name** | **Start Year** | **End Year** | **Category** | **Geographic Area** | **Needs Addressed** | **Funding** | **Goal Outcome Indicator** |
| --- | --- | --- | --- | --- | --- | --- | --- | --- |
| **1** | Public Services | 2022 | 2027 | Non-Homeless Special Needs Non-Housing Community Development Public Services | Citywide | Public Services | CDBG: $116,496 | Public service activities other than Low/Moderate Income Housing Benefit: 229 Persons Assisted |
| **2** | Public Facility Improvements | 2022 | 2027 | Non-Housing Community Development | CT 071322 BG 3 CT071332 BG 2,3 CT071339-1 CT065121-1,2,4 | Public Facilities | CDBG: $504,817 | Public Facility or Infrastructure Activities for Low/Moderate Income Housing Benefit: 6565 Households Assisted |
| **3** | Administration | 2022 | 2027 | Planning & Administration | Citywide | Administration | CDBG: $151,328 | Other: 1 Other |
| **4** | Fair Housing Education & Outreach | 2022 | 2027 | Affordable Housing Non-Homeless Special Needs Fair Housing | Citywide |  | CDBG: $4,000 | Other: 1 Other |

Table 2 – Goals Summary

**Goal Descriptions**

|  |  |  |
| --- | --- | --- |
| **1** | **Goal Name** | Public Services |
| **Goal Description** | Funds will be used to assist low-moderate income households at risk of homelessness with mortgage, rental, utility payments; to provide mentoring services to Palm Bay youth; to provide non-emergency medical transportation for seniors, supportive services for blind and visually impaired residents; to provide free SCAT bus passes to income eligible residents. |
| **2** | **Goal Name** | Public Facility Improvements |
| **Goal Description** | Funds will be used for improvements of Riviera and Liberty parks, and Palm Bay Acquatic Center; construction of sidewalks (east end of San Filippo Blvd. from Wichita Blvd. to Eldron Blvd.) These projects will benefit areas located in a low income Census Tracts. |
| **3** | **Goal Name** | Administration |
| **Goal Description** | Administration and Operational costs.  Administration of various programs, including, but not limited to: conducting environmental reviews, processing invoices for payments, Davis Bacon interviews, monitoring of agencies, and providing technical assistance when required. |
| **4** | **Goal Name** | Fair Housing Education & Outreach |
| **Goal Description** | Space Coast Government Television will run public service announcements throughout the year.  City residents requiring assistance with Fair Housing issues will be referred to the Fair Housing Coordinator located at the Brevard County Government Offices. |

## AP-35 Projects - 91.420, 91.220(d)

**Introduction**

The Program Year 2024 planned projects will address the City of Palm Bay’s Housing & Community Development needs. The City has identified the following programs as a result of the priority needs identified in the Consolidated Plan. The activities being recommended in each of the programs for initial funding have been evaluated for eligibility, readiness to proceed, leveraged funds, and capacity of the entity carrying out the activity. Additionally, should funds become available from unanticipated program income or activities coming in under budget, the City may add additional activities to the identified priority programs.  Those planned projects are described below.

| **#** | **Project Name** |
| --- | --- |
| 1 | CDBG Planning and Administration |
| 2 | Fair Housing Education & Outreach |
| 3 | Public Services |
| 4 | Public Facilities Improvements |

Table 3 – Project Information

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

Each year the city selects projects and activities that meet the priorities and goals identified in the Consolidated Plan.  The City employs a variety of methods to select projects, such as consultation with internal City staff and departments, and current subrecipients, as well as the implementation of other standing citywide plans, and formal request for proposals (RFP’s).  Selected projects and activities must best meet needs that are identified as priority based on project eligibility, availability of funding, the number of anticipated beneficiaries that will be served by the project, and the project’s readiness to proceed.

The City of Palm Bay strives to fund projects using the annual CDBG allocations that serve areas within the city that have been identified as having the greatest need for public investment.  These areas are citywide, however, areas are not identified as being a ‘targeted area,’ rather they serve high priority needs in areas that are traditionally over-utilized and underfunded.  If the project serves a critical need, and it is in a state of disrepair that can or will alter the Cities ability to provide an adequate level of service then it would be selected as a candidate for funding.

## AP-38 Project Summary

**Project Summary Information**

|  |  |  |
| --- | --- | --- |
| **1** | **Project Name** | CDBG Planning and Administration |
| **Target Area** | Citywide |
| **Goals Supported** | Administration |
| **Needs Addressed** | Administration |
| **Funding** | CDBG: $151,328 |
| **Description** | CDBG Administration and Operational Funds for staff to administer programs. |
| **Target Date** | 9/30/2025 |
| **Estimate the number and type of families that will benefit from the proposed activities** | Approximately 6,794 low and moderate income families whose income is at or below 80% of the area median income across the City of Palm Bay. |
| **Location Description** | Administration activities will be carried out at Palm Bay City Hall, 120 Malabar Rd. SE Palm Bay FL 32907, where the Community and Economic Development Department is located. |
| **Planned Activities** | Administration of various programs, including, but not limited to: conducting environmental reviews, processing invoices for payments, Davis Bacon interviews, monitoring of agencies, and providing technical assistance when required. |
| **2** | **Project Name** | Fair Housing Education & Outreach |
| **Target Area** | Citywide |
| **Goals Supported** |  |
| **Needs Addressed** | Fair Housing Education, Training, & Outreach |
| **Funding** | CDBG: $4,000 |
| **Description** | Brevard County HOME Consortium prepared an Assessment of Fair Housing (AFH) to gather updated information about the fair housing landscape in Brevard County and assist program staff in activities that enhance fair housing choice and access to opportunity in the community. Space Coast Government Television will run public service announcements throughout the year. City residents requiring assistance with Fair Housing issues will be referred to the Fair Housing Coordinator located at the Brevard County Government Offices. |
| **Target Date** | 9/30/2025 |
| **Estimate the number and type of families that will benefit from the proposed activities** | An estimated 40,918 households will benefit from the public service announcements that will be run by Space Coast Government Television. |
| **Location Description** | Fair Housing activities will be carried out Countywide through the HOME Consortium of which City of Palm is a member.  Space Coast Government Television will run public service announcements throughout the year.  City residents requiring assistance with Fair Housing issues will be referred to the Fair Housing Coordinator located at the Brevard County Government Offices, 2725 Judge Fran Jamieson Way, Viera, FL 32940. |
| **Planned Activities** | Public service announcements will be run by Space Coast Government Television throughout the year;  Referrals to the Fair Housing Coordinator as and when required by income eligible families with income at or below 80% of the Area Median Income. |
| **3** | **Project Name** | Public Services |
| **Target Area** | Citywide |
| **Goals Supported** | Public Services |
| **Needs Addressed** | Public Services |
| **Funding** | CDBG: $116,496 |
| **Description** | Funds will be used to assist low-moderate income households at risk of homelessness with mortgage, rental utility payments; to provide mentoring services to Palm Bay youth; to provide non-emergency medical transportation for seniors, supportive services for blind and visually impaired residents; to provide free SCAT bus passes to income eligible residents. |
| **Target Date** | 9/30/2025 |
| **Estimate the number and type of families that will benefit from the proposed activities** | An estimated 229 families will benefit from the proposed activities. |
| **Location Description** | These activities will be undertaken in the low to moderate income areas with an income at or below 80% of the Area Median Income. |
| **Planned Activities** | Public services will address the needs of seniors, youth, homeless, special needs persons and will include education, transportation, supportive and food services. |
| **4** | **Project Name** | Public Facilities Improvements |
| **Target Area** | CT 071322 BG 3 CT071332 BG 2,3 CT071339-1 CT065121-1,2,4 |
| **Goals Supported** | Public Facility Improvements |
| **Needs Addressed** | Public Facilities |
| **Funding** | CDBG: $504,817 |
| **Description** | Improvements will be made to the following public facilities: Riviera Park, Liberty Park, and Palm Bay Aquatic Center. The City will also carry out construction of sidewalks in low-moderate income areas. |
| **Target Date** | 9/30/2025 |
| **Estimate the number and type of families that will benefit from the proposed activities** | An estimated 6,565 households will benefit from these public facilities improvements. |
| **Location Description** | The projects are located in the following Low income Census Tracts: 71339/1, 71322/3, 65121/1, 71332/3. |
| **Planned Activities** | Liberty Park project will include replacing backstop on four softball fields, removal and replacement of clay on two fields, retrofitting basketball court light levels to energy sufficient LED fixtures.  Riviera Park project  will include the removal and replacement of existing tennis/pickleball courts including sub-base, associated equipment, and fence enclosure.  Palm Bay Aquatic Center project will include removal and replacement of circulation/treatment pumps, and pool chemistry controller system.  San Filippo Sidewalk project will include design, testing, survey and construction of 0.65 miles 8' sidewalk. |

## AP-50 Geographic Distribution - 91.420, 91.220(f)

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

According to the U.S. Census Bureau, the City has a total area of 101.4 miles (101.4 mi), of which 97.86 miles (97.86 mi) is land and 3.1 square miles (8.1 km2), or 4.56%, is water. The City's population is estimated to be approximately 125,743 persons.   The City is often referred to in four quadrants: Northwest, Northeast, Southwest and Southeast, each containing multiple zip codes.  There is an area with the Southwest quadrant referred to as "the Compound" which comprises 2,942 acres of vacant land.  The low- income target areas and block groups are highlighted below. As part of the City’s Vision Comprehension Plan, the *Housing Element* is to ensure that the City of Palm Bay regulates residential development in a manner that can equitably, efficiently, and effectively meet the housing needs of the community’s existing and projected populations. The Data & Analysis portion of this Element seeks to provide a factual basis for future housing decisions and policy changes made by the City as part of this update. Housing-related topics examined as part of this analysis include housing unit counts, types, age, occupancy status, condition, values, costs, subsidies, existing and projected needs, and considerations for advancing equity in the local housing market. Per ACS, there were 43,771 housing units in the City in 2021. Between April 1, 2021, and March 31, 2022, a total of 1,529 permits were issued for new homes (1,526 single family and 3 mobile homes) and the demolition of one single family home, bringing that total number of new units to 45,299. The detailed data contained in this element, however, is for 2021 as the ACS and the Florida Housing Data Clearing House do not currently have any more recent data.

Funding will be directed to qualified low- and moderate income (LMI) census tracts, in addition to other areas indirectly through assistance to LMI households who are income qualified for program funding. All the CDBG funding (100%) will benefit LMI clientele and areas.

The City of Palm Bay does not implement any HUD designated geographic based priority areas such as Neighborhood Revitalization Strategy Areas (NRSA) or Empowerment Zones. The City utilizes an application process to select eligible projects throughout the City of Palm Bay.   The City received a total of 17 funding applications for the 2024-2025 program year for a wide range of projects, youth mentoring, case management, and other services.

**Geographic Distribution**

| **Target Area** | **Percentage of Funds** |
| --- | --- |
| Citywide | 35 |
| CT 071322 BG 3 | 11 |
| CT065201 BG1, 2, 3 |  |
| CT065202 BG 1, 2 |  |
| CT071332 BG 2,3 | 6 |
| CT071337-4 |  |
| CT071334-3 |  |
| CT071339-1 | 35 |
| CT071340-3 |  |
| CT065121-1,2,4 | 13 |
| CT065122-1,3 |  |
| CT065123-1,2 |  |
| CT071336-1 |  |

Table 4 - Geographic Distribution

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

The City of Palm Bay will allocate its CDBG funds to those geographic areas whose population is at or below 80% low- to moderate-income. At least 80% of all the City’s CDBG funds are budgeted for activities which principally benefit low- to moderate-income households.

For the 2024 Action Plan, the city made funding available through a Request for Proposal (RFP) process. This process prioritized funding for projects citywide and projects that are located in target areas defined in this section. While these target areas are prioritized, the City does not expect to solely fund projects in these neighborhoods and encourages submissions for projects that meet the priority needs and goals described in the 2022-2027 Consolidated Plan.  The ACS (2015-2019) provides estimates for the total number of owner and renter occupied households within the City.

Over the past 20 years, the fluctuations in the median sale prices for homes in the City largely match those experienced by Brevard County and the State of Florida. The City of Palm Bay’s median home sale price, however, has never exceeded those experienced at the County or State level. The primary benefit of this phenomenon is that the City’s housing market can be seen as more affordable than many of the other communities located within Brevard County and the State. However, lower local housing values often result in a lower tax base, which means less funding for important community facilities, services, and amenities, such as roadway improvements, park expansions, and law enforcement. For these reasons it is critical the City fund Public Facility Improvement projects, to adequately respond and address the needs of low-to-moderate income families throughout the City.  This allows low-to-mod income.

Although property values have increased and continue to rise, salaries have maintained stagnant.  To address the needs of low-to-moderate income families having access to homeownership opportunities, the City has used and will continue to fund the First Time Homebuyer program with HOME funding.  The City intends to continue funding projects to create and maintain affordable housing.

The City addresses the need to rehabilitate owner occupied homes primarily with SHIP funding, to households at or below 80% AMI.  This ensures to preserve current housing stock, while assisting limited income families maintain homeownership. Using HOME funds, the City funded a non-profit organization to purchase and rehabilitate a triplex for rental, located in a low to moderate income area.  Once completed, this will add to the affordable housing stock in the City.  The City also published a Request for Proposals for rehabilitation/new construction of affordable housing for income eligible senior citizens and/or veterans on six City donated lots using HOME funds.

**Discussion**

The City is committed to funding projects that support residents that are in LMI households.

According to the U.S. Census Bureau, the city has a total area of 101.4 miles (101.4 mi), of which 97.86 miles (97.86 mi) is land and 3.1 square miles (8.1 km2), or 4.56%, is water. The city is often referred to in four quadrants: Northwest, Northeast, Southwest and Southeast, each containing multiple zip codes.  There is an area with the Southwest quadrant referred to as "the Compound" which comprises 2,942 acres of vacant land.  The low- income target areas and block groups are highlighted above in Geographic Distribution Table. Unfortunately, for the City to address the needs of individual/families facing the risks of homelessness, additional funding would be needed.  In discussions with local housing partners for current projects, the City has received feedback in which subsidy limits are not properly reflecting the following;

* increase of construction costs,
* higher property values,
* an increase in demand stemming from the influx of out of state residents after the Covid Pandemic.

The City has had conversations with local housing partners to find alternative solutions to a stateside issue.  For projects to be successful, multiple private and public funding must be included in proposals.  Developer fees will need to be kept at a minimum, impacting the number of developers wanting to carry out affordable housing projects.

## AP-75 Barriers to affordable housing -91.420, 91.220(j)

**Introduction**

The City facilitates an Affordable Housing Advisory Committee (AHAC) that regularly monthly, if needed. A member of the City’s Planning and Zoning Board is also a member of the AHAC and provides updates to the AHAC on proposed policies that may affect affordable housing. The AHAC will continue to bring affordable housing barriers and issues to light and provide the City an opportunity to address those issues as they are identified.

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

The City of Palm Bay participates in the State Housing Initiatives Partnership (SHIP) program. To receive and use SHIP funds for the development of affordable housing, they are required to appoint an affordable housing advisory committee that reviews established policies, procedures, ordinances, and land development regulations impacting housing development each year. This review of policies culminates in a report, the *Affordable Housing Incentives*Report. Some previously adopted recommendations are listed below.

 The City has in place a mechanism whereby a developer can request to enter into an Impact Fee Deferment Agreement. The conditions and timeframe on the deferment is considered on a case-by-case basis.

* The City currently permits flexibility in densities for all housing, particularly under its Planned Unit Development (PUD) process. The City Council approved Voluntary Inclusionary Zoning Ordinance 2022-73 at their meeting on July 21, 2022, which added a section related to density or intensity bonus incentives or more floor space than allowed under the current or proposed future land use designation or zoning; or greater height, reducing or waiving certain fees; or granting other incentives.
* The City currently permits accessory residential units in residential zoning districts.
* Flexible setback requirements are presently offered to all development upon approval by Planning and Zoning Board and City Council. Council approved Ordinance 2022-73 on July 21, 2022, which allows for an Administrative Variance that involves matters such as setbacks, floor area ratios, frontage requirements, subdivision regulations, height limitations, lot coverage/size restrictions, yard requirements, parking, and other variances which have no relation to change of use of the property in question. An administrative variance may be granted by the City Manager, or designee, as authorized by the procedure set forth and shall be used for a variance from the provisions of this Code limited to improvements existing at the time of application as opposed to planned construction. Administrative variances will not be granted within easements. The maximum amount of the waiver is up to, but not greater than, twenty percent (20%) of the requirement.  As part of the Ordinance a section was added related to Voluntary Inclusionary Housing density or intensity bonus incentives or more floor space than allowed under the current or proposed future land use designation or zoning; or greater height, reducing or waiving certain fees; or granting other incentives.
* The City currently offers zero-lot-line configurations in its Planned Unit Development (PUD) process.
* The City of Palm Bay has a process by which a local government considers, before adoption, policies, procedures, ordinances, regulations, or plan provisions that increase the cost of housing.

Regarding barriers for households to fairly obtain affordable housing, the City, as part of the Brevard County HOME Consortium updated the Assessment of Fair Housing in October 2023.

**Discussion**

Funding allocations for PY 2024 increased slightly for HOME and CDBG allocations and for State affordable housing funds. However, the cost of housing in the City continues to rise with owner and rental housing rising to levels that are unaffordable to low- and moderate-income households. The most significant barrier continues to be the lack of financial resources available to address affordable housing needs in the City.

## AP-85 Other Actions - 91.420, 91.220(k)

**Introduction**

The City of Palm Bay, in collaboration with the Brevard County HOME Consortium has developed actions listed below planned to address obstacles to meeting underserved needs, foster and maintain affordable housing, reduce lead-based paint hazards, reduce the number of poverty-level families, develop institutional structure, and enhance coordination between public and private housing and social service agencies.

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

A major obstacle to meeting all underserved needs is the lack of financial resources as identified in the City's Five (5) Year Consolidated Plan and Annual Action Plans.  To overcome the obstacle, the City of Palm Bay will continue to seek other sources of funding and develop viable partnerships with other service providers to enhance the availability of underserved populations such as, youth, elderly, homebound frail elderly, the physically and/or developmentally disabled, and victims of domestic violence.

To overcome the obstacle of high home prices, the City will increase the amount of funds available for First Time Homebuyers to assist income eligible residents to purchase homes.

Through its ongoing CDBG, HOME and SHIP programs, the City will continue to fund projects that will improve the lives of its neediest citizens.  The City will continue to utilize its CDBG, HOME, and SHIP funds to the fullest extent to assist in meeting underserved needs. Leveraging efforts with public and private funding agencies were also made to supplement federal funds and increase the resources available to address community needs.

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

Access to affordable Homeownership and maintaining homeownership can be a costly endeavor.  In addition to the reoccurring costs associated with taxes, insurance, utilities, and association fees, maintenance costs for repairs and improvements tend to exponentially increase as structures age.  Other significant costs to homeownership are down payment costs, mortgage insurance, and mortgage payments, which can influence decisions to either buy or rent property.  FHDC reports that almost half of the homeowners in the City earn income at or below the Area Median Income (AMI) and 42% of them are cost burdened.  Approximately 24% of those households pay from 30% to 50% of their income for housing, and about 17% are severely cost-burdened (paying more than 50% of their income for housing).

Most of the City of Palm Bay's HOME and SHIP funds are used to foster and maintain affordable housing.  HOME funds are currently being used for down payment assistance and new construction/with down payment assistance.  Macedonia Community Development Corporation executed an agreement for the purchase and rehabilitation of a triplex for rental purposes to income eligible residents using HOME funds.  In spring of 2024, HOME funds were advertised by the City for an RFP for six city donated lots for rehabilitation/new construction of affordable rental housing for seniors and/or veterans.  Pending the response to the RFP, the City should be executing an agreement by August of 2024 with HOME funds. Additionally, the City has a HOME funded agreement with Community Housing Initiative, Inc. (CHI) for the new construction of five (5) units for affordable housing homeownership.

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

The City of Palm Bay will take the following actions to reduce lead-based paint hazards:

1. Continue to implement the Lead Safe Housing Rule and will ensure that all homes built prior to 1978 are inspected by qualified hazard evaluation professional and all mediation is performed by certified lead hazard contractors.
2. Ensure that contractors who perform renovation, repairs, and painting jobs in pre-1978 housing and child-occupied facilities, before beginning work, provide owners, tenants, and child-care facilities with a copy of EPA's lead hazard information pamphlet Renovate Right: Important Lead Hazard Information for Families, Childcare Providers, and Schools and document compliance with this requirement; EPA's pre-renovation disclosure form.
3. Ensure that lead hazard reduction be performed according to 24 CFR 35.930 on units testing positive and ongoing maintenance, monitoring and cleaning be ongoing for properties that maintain a relationship with the County/cities.
4. Ensure that contractors follow three simple procedures:

* Contain the work area. The area should be contained so that dust and debris do not escape from that area. Warning signs should be put up and heavy-duty plastic and tape should be used as appropriate: Cover the floors and any furniture that cannot be moved. Seal off doors and heating and cooling system vents. These will help prevent dust or debris from getting outside the work area.
* Minimize dust. There is no way to completely eliminate dust; however, some methods make less dust than others. For example, using water to mist areas before sanding or scraping; scoring paint before separating components; and prying and pulling apart components instead of breaking them are techniques that generate less dust than alternatives.
* Clean up thoroughly. The work area should be cleaned up daily to keep it as clean as possible. When all the work is done, the area should be cleaned up using special cleaning methods before taking down any plastic that isolates the work area from the rest of the home. The special cleaning methods should include using a HEPA vacuum to clean up dust and debris on all surfaces, followed by Wet-mopping with plenty of rinse water.

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

The City of Palm Bay will coordinate efforts among its many partner organizations to include CDBG subrecipients to ensure that the goals outlined in the Consolidated and PY 2024 Action Plan are met. These partners include neighborhood residents, representatives of health and human service agencies, businesses, churches, nonprofit developers, health and human service agencies, lenders and other for-profit entities.

The key goals of the City's anti-poverty strategy and five-year strategic plan are as follows:

* Provision of adequate and affordable housing
* Neighborhood stabilization
* Elimination of substandard housing
* Availability of special needs housing

In its *Urban Blight and Public Health Research Report* (2017), the Urban Institute defined substandard housing “as residential spaces with structural and other physical deficiencies that do not meet health and safety requirements, thereby endangering the health and safety of residents.” However, accurately determining the City’s total inventory of substandard units is impracticable, as it would likely require in-person inspections for each unit within Palm Bay. As such, most housing organizations and local government utilize a wide range of indicators to estimate if a housing unit is likely substandard. The most often used indicators in Florida are conditions of overcrowding and/or units lacking complete kitchen or plumbing facilities.

A vast majority of the City’s housing stock is likely not considered to be substandard according to indicators utilized by the ACS. This is likely because most of Palm Bay’s housing stock is comprised of homes constructed within the last 50 years and thus, were required to meet contemporary building standards.

The developed strategic plan will target the low-income areas of the City. The goal of the poverty initiative is to combat poverty within the City of Palm Bay to the greatest extent feasible with tangible resources and realistic objectives. The Community and Economic Development Department is actively working with the other City Departments, the City’s Homeless task Force, Brevard Homeless Coalition – Continuum of Care, and numerous other agencies to accomplish the strategies recognized in this plan. The Consolidated Plan is the guide, and the CDBG-funded activities will assist in the Anti- Poverty Strategy.

The Housing Element report shows an inventory of 475 government subsidized housing units in the City.  85 of these units are for elderly residents, and the balance of 390 units are for families.

**Actions planned to develop institutional structure**

Strengths:  The City of Palm Bay is a member of the Brevard County HOME Consortium, which is a strength to the institutional delivery system. Brevard County’s Housing and Human Services Department serves as the Consortium’s lead agency for planning and coordinating the implementation of the Consolidated Plan. The County organizes and facilitates monthly HOME Consortium meetings where the County and each participating-member of the Consortium meet to discuss planning processes, opportunities for partnership, fair housing activities, progress on any HOME-funded activities, and to share capacity/knowledge where possible.

Each HOME Consortium city implements their own HOME program, with few opportunities for projects to be jointly funded across jurisdictions. This is mostly because the amount of funding is such that it makes larger scale projects difficult, even when joint funding is possible.

The City will continue to seek and provide training for staff that promotes efficiency and effectiveness in the administration of the CDBG and HOME Programs. Training shall include venues offered by HUD through the HUD Exchange, the Florida Community Development Association, fair housing organizations, and the Florida Housing Coalition, etc. However, due to the COVID-19 pandemic, travel had been limited to virtual trainings and meetings. As restrictions have lifted, in person trainings will be attended when available.

The City will continue to build relationships with non-profit and for-profit housing providers and developers to support and enhance its housing development strategy. Finally, the City will continue to work collaboratively with municipalities, non-profit and private entities throughout the State to develop and strengthen its capacity to carry out programs within the City.

The CoC utilizes the “housing first” model and encourages all service agencies to utilize the chosen homeless management information system (HMIS) software. Although not all service agencies do utilize HMIS, the CoC recognizes the usefulness of HMIS and is actively working with service agencies to participate in HMIS and a coordinated assessment process to best serve the community and most efficiently allocate resources.

Gaps: The City does not have the institutional structure to target, monitor, nor manage programs for homelessness or persons with HIV. Service providers for specific types of eligible activities, such as mental health counseling, may not be available in the City limits or have limited funding.

The BHC continues to make efforts to expand the number and types of organizations that comprise the CoC. The CoC has both ESG, and ESG-CV resources and provides those funds to service organizations. These resources paired with training supports provides incentives for organizations to join the CoC that may fill gaps in services as they become known. City staff work closely with the CoC and hold one seat on the CoC advisory board. BHC will also continue to encourage service providers to utilize HMIS so gaps and can be understood quickly and the CoC may work with its partners to address that gap.

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

The City has staff that sit on government boards and advisory councils that regularly consult with private housing and social service agencies. These platforms are a great medium for the City to learn about issues facing the private housing market as well as those agencies that are providing services in the field. The City will continue this role and will build relationships with those organizations to understand needs and needed resources to meet needs.  Technical assistance is offered to all sub-recipients to educate them on the grant funds, application process, eligible uses, additional requirements when utilizing these funds and long-term conditions on their use.

**Discussion**

The Housing Element report states that the City’s projected housing needs based on the projected 2045 population will need to increase to 53,649 units.  To meet the City’s projected demand of 53,649 units by 2045, a minimum of 9,878 new units will need to be constructed within the next 22 years.  The City can expect its population of cost-burdened households to exceed 16,000 with the next 3 years, a significant majority of which will likely earn monthly income lower than the AMI.  In efforts to assist this growing population in obtaining and keeping stable housing conditions, the City will continue to explore methods to increase the diversity of its housing stock and the inventory of available affordable housing units in the future.    The overwhelming majority of the housing stock in Palm Bay is comprised of owner-occupied single-family detached homes.  The lack of diversity in local housing options and tenure often creates a financial barrier to those who cannot afford to purchase a home, such as low-to-moderate income workers (e.g., teachers, firefighters, etc.), individuals with substantial debt, retirees, single-parent households, or those with special needs.  By expanding the City’s housing stock with more moderate to high density housing options, particularly those available for rent to households making 30% or less of the AMI, the City can create a more affordable housing market for its current and prospective residents.

The City of Palm Bay, in collaboration with the Brevard County HOME Consortium has developed the following actions which addresses obstacles to meeting underserved needs: fostering affordable housing, reducing lead-based paint hazards, reducing the number of poverty level families, developing institutional structures, and enhancing coordination between public and private housing and public service agencies.

# Program Specific Requirements

**AP-90 Program Specific Requirements - 91.420, 91.220(l)(1,2,4)**

**Introduction**

The City of Palm Bay receives an annual allocation of CDBG funds as an entitlement city.  HOME funds are received as part of the Brevard County HOME Consortium.  The City follows HUD program regulations and federal statutes for its federally funded programs through CDBG and HOME.  One hundred (100%) percent of CDBG funds are used for activities that benefit low- and moderate-income persons.

**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 | 674,384 |
| 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:** | **674,384** |

**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. | 0.00% |

**Discussion**

The City of Palm Bay anticipates receiving clearance from HUD to use NSP program income of $674,383.67 for CDBG activities. The City of Palm Bay does not anticipate receiving any CDBG Program Income, surplus funds from urban renewal settlements, grant funds returned to the line of credit for which the planned use has not been included in a prior statement or plan, or income from float-funded activities during PY 2024.