



PUBLIC REVIEW DRAFT

December 22 – January 22, 2024
Public Review Period

2023 ACTION PLAN
SUBSTANTIAL AMENDMENT #1

A COMPONENT OF THE
2020-2024 CONSOLIDATED PLAN
FOR THE CITY OF BILOXI, MISSISSIPPI

THE COMMUNITY DEVELOPMENT BLOCK GRANT
ENTITLEMENT PROGRAM

PREPARED BY
Grace Aaron Development Consultant
and
the City of Biloxi Federal Programs Division

A substantial amendment to Biloxi's 2023 CDBG Action Plan was prepared during November 2023 – February 2024 to add a new project, "Public Safety Improvements - Acquisition of a Fire Truck Project," and budget previously allocated but unexpended CDBG resources from an existing project to fund the first of three annual payments for the fire truck. The first payment is proposed to be paid during PY2023; as of December 20, 2023, the first payment total amount is **\$959,995**. The second and third payments are anticipated to be approximately \$400,000 each and are proposed to be paid during PY2024 and PY2025. The new truck proposed to be purchased will replace a +20 year old ladder truck that serves an East Biloxi area, which includes 7,315 residents, who will be direct project beneficiaries. Of these residents, 4,190 or 51.49% are low- to moderate-income.

Proposed changes to the 2023 CDBG Action Plan are underlined in this draft to facilitate public review. In addition to participating in a Thursday, December 21, 2023 public hearing, the City is encouraging interested residents and stakeholders to submit written comments regarding the proposed substantial amendment during a formal 30-day written comment period, which begins Friday, December 22, 2023 and ends at 4:00 p.m., Monday, January 22, 2024. To be considered by the City, comments must be **received** by the 4:00 p.m., January 22, 2024 deadline. Written comments may be delivered to the Biloxi Federal Programs Office located at 214-A Delauney Street; emailed to spickich@biloxi.ms.us; or mailed to the Federal Programs Office P.O. Box 429 Biloxi, MS 39533.

For more information about Biloxi's CDBG Entitlement Program, visit the City's website <http://www.biloxi.ms.us/cdbg/>.



**Proposed Substantial Amendment #1
to the CDBG 2023 Action Plan,
a Component of the 2020-2024 Consolidated Plan
for the City of Biloxi CDBG Entitlement Program**

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

Pursuant to the requirements of 24 CFR Part 91, the City of Biloxi, Mississippi developed its Five-Year Consolidated Plan for the period 2020-2024 in compliance with consolidation of planning and application requirements of the U.S. Department of Housing and Urban Development (HUD) for its CPD programs. Biloxi is an entitlement city for the Community Development Block Grant (CDBG) Program, one of the four programs subject to these requirements.

In compliance with CDBG Program national objectives, the City of Biloxi invests almost all of its CDBG resources to principally benefit low- to moderate-income residents by funding projects that support at least one of the program's three broad goals: to provide decent housing; provide a suitable living environment; and expand economic opportunities.

The Five-Year Consolidated Plan consists of three sections: identification of housing and community development needs through data assessment; a housing market analysis; and a strategic plan that prioritizes housing and community development needs and identifies strategies the City will implement with available CDBG resources over the 2020-2024 planning period.

The 2023 Action Plan identifies CDBG resources anticipated to be available in Program Year 2023 to address needs and objectives established in the Consolidated Plan and how these resources will be invested to achieve the City's housing and community development goals and objectives, particularly as they relate to low- and moderate-income residents. Biloxi's program year runs from October 1 to September 30.

The 2023 Annual Plan was developed with the participation of residents, elected officials, affordable housing representatives, public service providers and many other stakeholders.

During November 2023 – February 2024, the City developed a substantial amendment to its 2023 CDBG Action Plan to add a new project "Public Safety Improvements - Fire Truck Acquisition" and to budget available PY2023 CDBG resources of \$959,995 for the first of three payments for acquisition of the truck. Substantial amendment #1 was developed in compliance with the Biloxi Citizen Participation Plan.

2. Summarize the objectives and outcomes identified in the Plan

Objectives identified through the 2020-2024 Consolidated Plan and 2023 Action Plan development process focus on using limited CDBG resources to address high priority unmet needs in the City of Biloxi that will primarily benefit low- to moderate-income residents by improving their living conditions.

Consistently, residents and nonprofit agency representatives express support for using CDBG and other resources to improve basic infrastructure and services, including improved public safety; improved drainage to alleviate recurring flooding in Central and East Biloxi; street, sidewalk and parks improvements; and to support public services addressing homelessness, affordable childcare services, youth education/recreation programs; and job training/workforce development activities that expand opportunities for lower income residents to earn a living wage.

The need to maximize the effective and efficient use of limited public resources also continues to be identified as a priority objective.

3. Evaluation of past performance

Through its Consolidated Annual Performance and Evaluation Report (CAPER), the City annually analyzes and reports on its performance during the preceding program year to HUD; the City publicizes the availability of each CAPER, which is maintained for public review in the Federal Programs Division Office of the City.

In conjunction with citizen input and progress made toward addressing high priority unmet community needs, evaluation of past performance is considered by the City during the process of identifying projects to be funded each program year.

For example, during PY2018 through 2022, the City has been successful in achieving annual goals to address the high priority need to expand access to affordable childcare. Based on past success and input regarding the on-going community need, the City of Biloxi plans to invest CDBG resources to support qualified public service agencies in providing affordable childcare services to eligible households again in PY2023.

Successful implementation of transportation improvement projects, as identified in past performance evaluations, likewise have resulted in use of CDBG resources to achieve the goals of providing suitable living environments and improved public safety in primarily low- to moderate-income areas. Accordingly, the City proposes to invest PY2023 CDBG funds to support implementation of Phase II of the East Biloxi East-West Neighborhood Access Road Project.

There were no findings as a result of the HUD Field Office's May 2023 monitoring of Biloxi's PY2019 CDBG Entitlement Program activities.

4. Summary of Citizen Participation Process and consultation process

Planning and development of the Biloxi 2023 Action Plan was initiated in March 2023 to provide adequate time for broad public outreach and scheduled opportunities for input. To broaden public outreach and encourage public input, the City conducted two public hearings, established a formal 30-day written comment period and complied with HUD's advance notification regulations and the Biloxi Citizen Participation Plan. HUD-required notices were published in the local newspaper as well as included in the City's monthly newsletter that is mailed to the +11,000 residences and businesses with a City of Biloxi water account. Notices also are posted throughout the City as described in template AP-12. Substantial Amendment #1 to the 2023 Action Plan was developed in full compliance with the Citizen Participation Plan. A public hearing was conducted on Thursday, December 21, 2023 and written comments were received during a 30-day comment period from December 22, 2023 – January 22, 2024.

5. Summary of public comments

Template AP-10 identifies the agencies that not only provided input into development of this document, but that also work with the City on an on-going basis to help address community needs. Templates AP-10 and AP-12 provide information about oral input and written comments received regarding the 2023 CDBG Action Plan and development of Substantial Amendment #1 to the AAP. The Citizen Participation Attachment includes documentation of the City's public outreach efforts, public hearing minutes summarizing oral comments and a copy of each written comment received by the City regarding development of the PY2023 AAP and Substantial Amendment #1.

All comments received expressed support for the City's proposed use of PY2023 funds and confirmed unmet priority needs identified in the Consolidated Plan remain a high priority, in large part due to increases in inflation and the cost of living.

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

All comments submitted to the City were accepted and considered.

7. Summary

The Mayor reserves the right to designate qualified subrecipients to assist in the City's on-going efforts to address high priority, unmet community needs through specific, HUD-eligible public service activities, subject to the approval of the Biloxi City Council and in compliance with HUD's annual budget limits on public service activities.

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

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

Agency Role	Name	Department/Agency
CDBG Administrator	CITY OF BILOXI	Engineering Department, Federal Programs Division

Table 1 – Responsible Agencies

Narrative (optional)

Optional

Consolidated Plan Public Contact Information

Susan Pickich, Federal Programs Manager
Engineering Department
(228) 435-6269
spickich@biloxi.ms.us

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

1. Introduction

The City of Biloxi complied with HUD CDBG Entitlement Program regulations and the Biloxi Citizen Participation Plan, inviting targeted groups identified by HUD, in addition to the general public, to consult with the City during development of the 2023 Action Plan. Development of Substantial Amendment #1 also complied with CDBG Entitlement Program regulations and the Biloxi Citizen Participation Plan.

Among those invited and encouraged to consult with the City include the Biloxi Housing Authority, Mississippi Regional Housing Authority VIII, Open Doors Homeless Coalition Continuum of Care, Gulf Coast Center for Nonviolence, Biloxi NAACP, Back Bay Mission, Coastal Family Health Center, Moore

Community House, Mental Health Association of South Mississippi, Mississippi Center for Justice, the Salvation Army of Biloxi and other potential stakeholders.

Input also was requested from residents of assisted housing, low-income residents, the Biloxi Public School District, agencies that represent special needs populations, agencies representing protected classes under the Fair Housing Act, other local units of government, regional agencies, public and social services agencies and others as identified in the mailing list in the Citizen Participation Attachment.

The Mississippi Center of Justice consulted with the City during a July 20, 2023 meeting, indicating that more public education is needed to improve residents' understanding of the rights under the Fair Housing Act. MCJ's representative also stated that it has had success conducting small workshops that allow time for residents' questions to be answered and for housing issues they have had to be discussed in terms of identifying when a fair housing violation has occurred and how to file a complaint with HUD. MCJ encourages the City to invest CDBG funds into this kind of effective fair housing outreach.

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))

To enhance coordination between public and assisted housing providers, private and governmental health, mental health and services agencies, the City of Biloxi encourages all known public and assisted housing providers, private and governmental health, mental health and service agencies to participate in the process for developing its CDBG Annual Action Plans, including attending CDBG public hearings and submitting written comments.

The City also encourages these agencies to attend Open Doors Homeless Coalition's monthly lunch meeting, which supports the exchange of information and encourages on-going collaboration.

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

The City of Biloxi consulted with the Open Doors Homeless Coalition Continuum of Care throughout development of the 2023 Action Plan. The Federal Programs Manager, who has the day-to-day responsibility of administering Biloxi's CDBG Entitlement Program, attends meetings of the Continuum of Care and the Executive Director of the Open Doors Homeless Coalition regularly attends and provides oral and written comments at the City's CDBG public hearings.

The City works with Open Doors throughout the Program Year to address the needs of Biloxi's homeless populations, including the chronically homeless, families with children, veterans and unaccompanied youth. The Biloxi Police Department will continue assisting the Open Doors Homeless Coalition to coordinate the annual Point In Time Count and to balance local public safety with the needs of homeless individuals and families.

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

outcomes of projects and activities assisted by ESG funds, and develop funding, policies and procedures for the operation and administration of HMIS

The City of Biloxi does not receive ESG funds but provides feedback to and supports the efforts of the Continuum of Care to administer its ESG award to best meet the needs of Biloxi residents.

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	Biloxi Housing Authority
	Agency/Group/Organization Type	Housing, PHA, Services – Housing, Services-homeless, Services-Health, Services-Education, Service-Fair Housing
	What section of the Plan was addressed by Consultation?	Housing Need Assessment, Public Housing Needs, Homeless Needs - Chronically homeless, Homeless Needs - Families with children, Anti-poverty Strategy, Lead-based Paint Strategy
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	The Biloxi Housing Authority (BHA) was emailed an invitation to participate in the 2023 AAP development process & was asked to complete a mailed questionnaire to provide updated assisted housing information. The Executive Director emailed the requested information & telephoned the Federal Programs Manager to discuss local assisted housing. The outcomes of consultation between the City & BHA include an improved understanding of local housing needs; maintenance of a collaborative working relationship for fair housing education; & an open exchange of ideas & information regarding HUD-funded programs.
2	Agency/Group/Organization	MS Regional Housing Authority VIII
	Agency/Group/Organization Type	Housing PHA Services - Housing Services-Health Services-Education Service-Fair Housing Regional organization

	What section of the Plan was addressed by Consultation?	Public Housing Needs Anti-poverty Strategy Lead-based Paint Strategy
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	The Mississippi Housing Authority Region VIII was emailed an invitation to participate in the 2023 AAP development process & asked to complete a mailed questionnaire to provide updated assisted housing information. The Executive Director emailed the requested information & offered to answer questions or provide additional information if needed. This type of consultation helps maintain good working relationships & a reliable source of necessary public housing assistance information. Region VIII does not own or manage any assisted housing developments in the City of Biloxi but it does provide housing assistance vouchers to eligible Biloxi residents. Biloxi assisted housing residents also are invited to participate in MRHA education programs and activities.
3	Agency/Group/Organization	Open Doors Homeless Coalition Continuum of Care
	Agency/Group/Organization Type	Housing Services-homeless Service-Fair Housing Services - Victims Regional organization
	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 Anti-poverty Strategy
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	The Open Doors Homeless Coalition Executive Director provided City of Biloxi 2023 PIT Count reports via email. The Executive Director & Federal Programs Manager also communicated by telephone & emails during development of the 2023 AAP to discuss local homeless issues. The outcome of this consultation is a good working relationship that benefits both the City & Open Doors.
4	Agency/Group/Organization	Gulf Coast Center for Nonviolence

	Agency/Group/Organization Type	Services-Victims of Domestic Violence Services-homeless Services-Health Services-Education Services-Employment Service-Fair Housing Regional organization
	What section of the Plan was addressed by Consultation?	Homeless Needs - Families with children Anti-poverty 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 consulted with the Gulf Coast Center for Nonviolence during 2023 Action Plan development & updated information was emailed to the City for use in the plan. GCCN also submitted an application for 2023 public service funding assistance & a representative attended the June public hearing. Outcomes of consultation include improving local response & expanding services to better meet the needs of those who have experienced domestic violence.
5	Agency/Group/Organization	Moore Community House
	Agency/Group/Organization Type	Services-Children, Services-Elderly Persons, Services-Persons with Disabilities, Services-homeless, Services-Health, Services-Education, Services-Employment, Service-Fair Housing
	What section of the Plan was addressed by Consultation?	Housing Need Assessment, Public Housing Needs, Homeless Needs - Chronically homeless, Homeless Needs - Families with children, Homelessness Needs - Unaccompanied youth, Homelessness Strategy, Non-Homeless Special Needs, HOPWA Strategy, Economic Development, Anti-poverty Strategy

<p>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</p>	<p>Following receipt of the emailed notice to consult in developing Biloxi's 2023 AAP, the Moore Community House (MCH) Executive Director telephoned the Federal Programs Manager to discuss the requested information update & unmet community needs, especially in East Biloxi. MCH representatives attended the June public hearing & submitted a written comment on behalf of MCH regarding proposed use of PY2023 CDBG funds & high priority community needs. The written comment was considered by the City & a copy is included in the Citizen Participation Attachment. An outcome of consulting with MCH includes an improved understanding of increasing poverty in East Biloxi & the unmet high priority needs of a majority of East Biloxi residents.</p>
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Identify any Agency Types not consulted and provide rationale for not consulting

The City consulted with all known agency types through telephone calls, emails, public hearings, meetings, B-News articles, posting of notices regarding the 2023 AAP development process and availability of information; distribution of flyers; and mailing of questionnaires.

To invite and encourage consultation into development of the 2023 AAP, the City sent letters to public and private target groups identified by HUD, in addition to the agencies, organizations and other stakeholders on its CDBG mailing list. Among other groups, invitation letters were mailed June 27, 2023 to Sparklight and AT&T, the two broadband Internet service providers with physical offices in the City, and to OOMA, which provides statewide service from its Jackson office. None of the three broadband Internet service providers requested a consultation meeting. Copies of letters mailed to each specified public and private target group are on file in the City's Federal Programs Division to document consultation outreach efforts.

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	Open Doors Homeless Coalition Continuum of Care	The Comprehensive Plan & the CDBG Strategic Plan for the City and Open Doors' Continuum of Care plan coordinate in terms of identifying homelessness as a high priority need that merits the short- & long-term efforts of both to address.
MS Analysis of Impediments to Fa	Mississippi HOME Corporation	The section of the State's A.I. pertaining to the City of Biloxi & Biloxi Housing Authority coordinates with the Strategic Plan component of Biloxi's 2020-2024 Consolidated Plan & 2023 AAP, identifying the goal of addressing impediments to fair housing through education outreach efforts to benefit of all residents.

Name of Plan	Lead Organization	How do the goals of your Strategic Plan overlap with the goals of each plan?
Sociodemographic & Economic Snapshots	Moore Community House (MHC)	This plan substantiates information provided by MCH during its 2023 AAP consultation with the City regarding unmet needs in East Biloxi. The City is proposing to budget CDBG public services funds to continue supporting the high priority need to improve access to affordable childcare services, which is particularly important to low-income, single residents with children who are seeking employment or struggling to maintain employment.

Table 3 – Other local / regional / federal planning efforts

Narrative (optional)

Other regional planning efforts were considered during development of the 2023 Action Plan but IDIS did not allow additional agencies and their plans to be identified above. These include the Gulf Regional Planning Commission's "MS Gulf Coast Plan for Opportunity." Goals in the ConPlan overlap several of the six livability principles identified in the Plan for Opportunity, including promoting equitable, affordable housing; supporting more public transportation choices; enhancing economic competitiveness; and expanding social opportunities.

The City continues to work collaboratively with the Mississippi HOME Corporation, the Mississippi Center for Justice and the Biloxi Housing Authority to educate residents about their rights under the Fair Housing Act and to strategize about how to address impediments to fair housing choice that continue to limit housing access for some Biloxi and Harrison County residents. Through collaborative efforts, the City works with these public entities to share information about locally-pertinent housing issues and housing assistance opportunities as well as to provide fair housing education outreach brochures and workshops.

The City mailed letters with questionnaires to other local units of government, including Harrison and Jackson Counties, requesting input about common transportation and infrastructure challenges, community needs and projects/programs that might benefit from a multijurisdictional approach. The City of D'Iberville and Jackson County responded to Biloxi's request for information by emailing the City completed questionnaires.

The Mississippi Secretary of State's Office, Mississippi Department of Environmental Quality, the Mississippi Department of Marine Resources and the Harrison County Emergency Services Department were invited to consult with the City regarding management of land, water and other public resources, flood damage prevention and hazard mitigation. Local broadband service providers and those working to narrow the digital divide also were invited to consult with and provide input to the City.

AP-12 Participation – 91.105, 91.200(c)

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

The Biloxi Citizen Participation Plan (CPP) identifies the City's processes for inviting and encouraging community participation and input into every phase of its CDBG Entitlement Program, from developing Five-Year Consolidated Plans and Annual Action Plans, to identifying specific CDBG-eligible projects and activities to be funded and implemented to achieve established goals, and to evaluating the City's performance throughout project implementation to closeout.

The City initiated its 2023 Action Plan development process by publishing notices of CDBG information availability in the local newspaper and in the monthly B-News publication mailed to +11,000 households and businesses in Biloxi and posting the notice on its website as well as in specific public buildings identified in the CPP. This was followed by emailing or mailing the development process schedule to known public service agencies and others on the City's CDBG email and mailing lists that include agencies representing NonEnglish speaking residents, agencies representing Fair Housing Act protected classes and agencies representing special needs populations.

A separate notice was published in both the newspaper and the City's monthly B-News, and posted on the Biloxi website and in specified public buildings for each of two public hearings, as required in the CPP. The availability of a public review draft of the 2023 and establishment of a 30-day written comment period likewise were advertised through publication of notices in the newspaper and monthly B-News.

In addition to publishing and posting notices to invite residents and other interested stakeholders to participate in the hearings and/or review and comment on the draft plan, the City sent letters to known public service agencies and HUD-identified public and private target groups to invite consultation with staff into development of the 2023 AAP. In response to the City's invitation letter, the Mississippi Center for Justice requested a consultation meeting with the Federal Programs Manager regarding MCJ's efforts to improve residents' understanding of their rights under the Fair Housing Act; assist them with filing violations; and enforce the FHA with case management services. Mr. Joplin, an attorney with MCJ, said there is a need to expand opportunities for residents to learn about fair housing rights and protection under the Fair Housing Act. MCJ offers FHA education and enforcement services in Biloxi but, according to Mr. Joplin, more resources are needed to assist low- to moderate-income residents in East Biloxi.

In an effort to broaden attendance by accommodating different schedules, the two public hearings were held at different times and on different week days. Besides staff, four people attended the first public hearing on Tuesday, May 23 at 5:00 p.m. and one written comment was submitted. In addition to staff, two people attended the second hearing on Wednesday, June 21 at 5:30 p.m.; one written comment also was submitted.

All written and oral comments offered at the public hearings were accepted and considered by the City in developing the final plan. No additional written comments were submitted during the 30-day comment period.

The Citizen Participation Attachment includes public hearing sign-in sheets, agenda packets and minutes; documentation of publication of notices and website postings; a copy of the City's CDBG email and mailing lists; and a copy of each written comment submitted.

Development of Substantial Amendment #1 also complied with the CPP. In addition to publishing and posting notices to invite residents and other interested stakeholders to participate in the public hearing and to review and comment on the public review draft, the City emailed notices to known public service agencies and those on its master CDBG email list to encourage their input and participation. A copy of the public hearing minutes and all written comments regarding the substantial amendment are included in the Citizen Participation Attachment.

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
1	Newspaper Ad	Minorities Non-English Speaking Persons with disabilities Non-targeted/broad community Residents of Public and Assisted Housing	A notice was published in the newspaper to advertise each hearing. The first public hearing was held at 5:00 pm Tues., May 23 with four residents and agency representatives participating. The second hearing was held at 5:30 p.m., Wed., June 21 with two agency representatives in attendance. A third hearing was held on Thurs., Dec. 21, 2023 regarding substantial amendment #1.	The minutes from all hearings are attached to the amended final plan as part of citizen participation documentation. One written comment was submitted at the first two hearings and <u>written comments were submitted at the third hearing in December 2023.</u> (to be completed following 12/21/23 hearing)	All comments received were considered.
2	Internet Outreach	Non-targeted/broad community	Not known because other forms of outreach were used to encourage citizen participation and input.	All written comments received and hearing minutes are included in the Citizen Participation Attachment.	All comments received were considered.

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons
3	B-News monthly publication notices	Non-targeted/broad community	The City published notices about CDBG public hearings, availability of information and public review draft documents in its monthly publication that is mailed to +11,000 City water/sewer service customers.	Not applicable	Not applicable

Table 4 – Citizen Participation Outreach

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

As an Entitlement City, Biloxi receives an annual allocation of CDBG funds from HUD to address local housing and non-housing community needs, particularly for low- to moderate-income individuals and households. HUD's PY2023 CDBG allocation to the City of Biloxi is \$404,451 and the City anticipates generating approximately \$175,784 in program income during the program year that runs from October 1, 2023 to September 30, 2024. The City anticipates having approximately \$61,952 in previously budgeted but unexpended PY2022 CDBG allocation funds and program income to carry forward to budget for PY2023 projects and activities.

Substantial Amendment #1 to the 2023 Action Plan proposes to add a new project "Public Safety Improvements - Acquisition of Fire Truck" and to budget available PY2023 CDBG resources of \$959,995 to pay the first of three payments for the new fire truck. The City anticipates that payments two and three, estimated as of December 20, 2023 to be approximately \$400,000 each, will be made during PY2024 and PY2025.

Funding an additional project in PY2023 was possible because construction bids for the East Biloxi East-West Neighborhood Access Project Phase II came in lower than anticipated. As part of substantial amendment #1, CDBG resources budgeted for the Access Road Phase II project will be decreased to reflect the reduced project cost.

Anticipated Resources

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 4				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Actual Program Income: \$	Prior Year Resources: \$	Total: \$		
CDBG	public - federal	Acquisition Admin and Planning Economic Development Housing Public Improvements Public Services	404,451	7,382 (PY22 PI) & 180,904 (PY23 PI)		1,616,895	404,000	The City anticipates its 2024 allocation will be about the same amount as its 2023 allocation.

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

Not applicable; the CDBG Entitlement Program allocation does not require a match.

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

City-owned or to-be-acquired property may be used in support of Phase II of the East Biloxi East-West Neighborhood Access Road Project to help address community needs for enhanced public safety and welfare or improved/expanded infrastructure.

Discussion

The Expected Resources Table, above, is proposed to be revised by Substantial Amendment #1 to include additional program income generated since development of the 2023 AAP and to identify prior year previously allocated but unexpended funds.

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	Administration	2020	2024	Administration	Not applicable	Not applicable	CDBG: \$100,000	Not applicable

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
2	Public Services Non-Housing Community Development	2020	2024	Non-Housing Community Development	Not applicable	Public Services-Non-Housing Community Development	CDBG: \$70,000	Public services other than LMI Housing Benefit: 241 Persons Assisted
3	Transportation Improvements	2020	2024	Non-Housing Community Development	Not applicable	Public Safety Improvements Transportation Improvements	CDBG: \$472,187	Infrastructure Activities other than LMI Housing Benefit: 2450 Persons Assisted
4	<u>Public Safety Improvements</u>	<u>2023</u>	<u>2024</u>	<u>Non-Housing Community Development</u>	<u>Not applicable</u>	<u>Public Safety Improvements – Acquisition of Fire Truck, payment 1 of 3</u>	<u>CDBG: \$959,995</u>	<u>Public Facility Activities other than LMI Housing Benefit: 7,315 Persons Assisted</u>

Table 6 – Goals Summary

Goal Descriptions

1	Goal Name	Administration
	Goal Description	Costs associated with administration of the CDBG Entitlement Program that may include but are not limited to staff training; legal and other professional services; environmental review; publication of notices and other public outreach costs; equipment; and supplies that may include materials for subrecipient training and fair housing education and outreach.
2	Goal Name	Public Services Non-Housing Community Development
	Goal Description	During Program Year 2023, the City budgeted \$70,000 to support programs and activities of qualified nonprofit agencies that benefit low- to moderate-income residents by addressing high priority community needs: <u>Coastal Family Health Center</u> – mental health assessment & treatment services for Biloxi homeless \$15,000 to benefit an estimated minimum of 136 Limited Clientele people <u>Gulf Coast Center for Nonviolence</u> – therapeutic children’s program for those who have experienced domestic violence \$15,000 to benefit an estimated minimum of 15 Limited Clientele children <u>Moore Community House</u> – affordable early childcare services \$25,000 to benefit an estimated minimum of 65 qualified children <u>Project BELIEVE</u> – summer educational program for at-risk youth residing in East Biloxi \$15,000 to benefit an estimated minimum of 25 income-qualified children.

3	Goal Name	Transportation Improvements
	Goal Description	Construction of multi-year funded East Biloxi East-West Neighborhood Access Road Project, Phase II (roadway between Hopkins and Porter) to serve a low/mod neighborhood. This goal overlaps with the recommended action in the 2019 Biloxi/BHA Analysis of Impediments to Fair Housing Choice to consult with transportation agencies to increase transit access options in low/mod areas.
4	Goal Name	<u>Public Safety Improvements</u>
	Goal Description	<u>This goal will address a high priority community need for public safety improvements through acquisition of a new ladder truck to replace one that is +20 years old and serves a large East Biloxi Project Service Area in which 7,315 people live, 4,190 or 51.49% of whom are LMI. The new truck will serve the same project area. Substantial amendment #1 to the PY2023 Action Plan proposes to budget funds for the first of three payments to acquire the truck, with the remaining two payments anticipated to be made in PY2024 and PY2025.</u>

AP-35 Projects – 91.220(d)

HUD's PY2023 CDBG Entitlement Program allocation to the City of Biloxi is \$404,451 and the City estimated it will generate approximately \$175,784 in program income during the same period. The City also anticipates carrying over previously allocated but unexpended CDBG funds of an estimated \$61,952 to support PY2023 projects and activities.

Program Year 2023 projects and activities proposed to be funded include \$100,000 for Administration; \$70,000 for NonHousing Public Service activities to benefit qualified low- to moderate-income residents; and \$472,187 to assist in funding Phase II construction of the multi-year funded East Biloxi East-West Neighborhood Access Road Project that will benefit an historic neighborhood in which 54.08% of households qualify as low- to moderate-income. PY2023 CDBG funding for the Access Road Project includes \$234,251 in 2023 entitlement allocation funds, \$175,784 in program income and \$61,952 in carried over funds previously allocated but unexpended.

Substantial Amendment #1 to the 2023 Action Plan proposes to add a new project, "Public Safety Improvements –Acquisition of Fire Truck," and to budget available CDBG resources to fund the first of three payments for the truck.

#	Project Name
1	Administration
2	East Biloxi East-West Neighborhood Access Road Project, Phase II
3	Public Services Non-Housing Community Development
4	<u>Public Safety Improvements – Acquisition of Fire Truck</u>

Table 7 - Project Information

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

The City of Biloxi's allocation priorities were identified during Biloxi's citizen participation process conducted throughout development of the 2020-2024 Consolidated Plan and subsequent development of Annual Action Plans for Program Years 2020, 2021, 2022 and 2023. 2023 Program Year resources will be used primarily to benefit low- to moderate-income residents through a major transportation improvement project and several public service activities. With funding available through the City's CDBG Entitlement Program, there are no anticipated obstacles to addressing the identified high-priority needs. Substantial Amendment #1 to the 2023 Action Plan proposes to add a "Public Safety Improvements – Acquisition of Fire Truck" Project to replace a +20 year old ladder truck that serves a large geographic area in East Biloxi. The first payment totals \$959,995 and is proposed to be funded with CDBG resources available in PY2023 CDBG resources; the second and third payments are anticipated to be paid in PY2024 and PY2025. The new truck will serve the same project area but will provide more reliable public safety services than the +20 year old truck it proposes to replace.

AP-38 Project Summary

Project Summary Information

1	Project Name	Administration
	Target Area	Not applicable
	Goals Supported	Administration
	Needs Addressed	Not applicable
	Funding	CDBG: \$100,000
	Description	PY2023 CDBG funds in the amount of \$100,000 are budgeted for eligible administrative expenses associated with administering the CDBG Entitlement Program in compliance with federal and state regulations and policies and local regulations, policies and procedures.
	Target Date	9/30/2024
	Estimate the number and type of families that will benefit from the proposed activities	Not applicable
	Location Description	Federal Programs Office City of Biloxi 214-A Delauney Street Biloxi, MS 39530
2	Planned Activities	Eligible administrative costs may include but are not limited to staff training/salary; legal, environmental review and professional administrative services; publication of notices and other public outreach costs; equipment; and supplies that may include materials for subrecipient training and fair housing education and outreach activities identified as recommended actions in the City's A.I.
	Project Name	East Biloxi East-West Neighborhood Access Road Project, Phase II

	Target Area	Not applicable
	Goals Supported	Transportation Improvements
	Needs Addressed	Public Safety Improvements Transportation Improvements
	Funding	CDBG: \$486,900
	Description	This project will improve public safety for residents in a primarily low- to moderate-income area of East Biloxi through design and construction of a neighborhood access road to preserve neighborhood access and improve emergency vehicle response times.
	Target Date	9/30/2025
	Estimate the number and type of families that will benefit from the proposed activities	The City estimates that 2,450 people will benefit from this project; 1,325 or 54.08% of total beneficiaries are low- to moderate-income.
	Location Description	East Biloxi between Hopkins Boulevard and Porter Avenue north of the CSX Railroad tracks
	Planned Activities	Activities will include design and construction of a two-lane neighborhood access road; right-of-way acquisition; demolition and relocation; environmental review; survey and legal work. *Funding combines \$234,451 in 2023 entitlement allocation funds; \$61,952 in carryover/prior year funds; and \$175,784 in program income.
3	Project Name	Public Services Non-Housing Community Development
	Target Area	Not applicable
	Goals Supported	Public Services Non-Housing Community Development
	Needs Addressed	Public Services Non-Housing Community Development
	Funding	CDBG: \$70,000
	Description	\$70,000 in CDBG funds is budgeted to implement the following high priority public service (non-Housing) activities during Program Year 2023: <u>Coastal Family Health Center (CFHC)</u> mental health assessment & treatment services for primarily homeless clients \$15,000; <u>Gulf Coast Center for NonViolence (GCCNV)</u> therapeutic children's program \$15,000; 100% limited clientele; <u>Moore Community House (MCH)</u> affordable early childhood education and daycare services \$25,000; and <u>Project BELIEVE</u> summer educational program for at-risk youth residing in East Biloxi \$15,000
	Target Date	9/30/2024
	Estimate the number and type of families that will benefit from the proposed activities	100% of beneficiaries of these public services activities will be very low and low-income residents. CFHC – estimates a minimum of 136 Limited Clientele beneficiaries GCCN – estimates a minimum of 15 Limited Clientele children MCH – estimates a minimum of 65 income-eligible children Project BELIEVE– estimates a minimum of 25 income-eligible children
	Location Description	Citywide

	Planned Activities	The City will execute subrecipient agreements with the four qualified public service agencies to provide services to address the following high priority unmet needs: mental health assessment/treatment services for Biloxi's homeless residents; therapeutic educational program to assist children who have experienced domestic violence; affordable early childcare services; and an affordable summer educational program for qualified at-risk children. Public service activities will be implemented and monitored in compliance with the City's SOPs and policies in addition to applicable federal and state regulations and policies.
4	Project Name	Public Safety Improvements – Acquisition of Fire Truck
	Target Area	Not applicable
	Goals Supported	Providing Suitable Living Environment for Residents
	Needs Addressed	Public Safety Improvements
	Funding	CDBG: \$959,995 (first of three payments)
	Description	<u>This project will improve public safety for residents in a primarily low- to moderate-income area of East Biloxi by replacing a +20 year old fire truck that has served its useful life with a new one, which will be assigned to the same station and serve the same project area.</u>
	Target Date	9/30/2025
	Estimate the number and type of families that will benefit from the proposed activities	<u>7,315 people will directly benefit from this project; 4,190 or 51.49% of total beneficiaries qualify as low- to moderate-income.</u>
	Location Description	<u>East Biloxi, generally between Porter Avenue (west) the Biloxi Channel (east), the Back Bay of Biloxi (north); and the Biloxi Sand Beach (south).</u>
	Planned Activities	<u>Activities will include developing an agreement for acquisition of a ladder fire truck based per City specifications and possibly training fire department staff on new equipment.</u>

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

The City of Biloxi does not allocate funds based on geographic priorities; it invests its limited CDBG resources to maximize benefit to low- to moderate-income residents. Attached maps identify the City's low- to moderate-income areas, as defined by HUD Census data; areas of minority concentration; and the location of PY2023 projects.

HUD-eligible activities are selected for funding by the City based on the community's priorities for addressing unmet needs as expressed during the citizen participation process.

Geographic Distribution	
Target Area	Percentage of Funds
Not applicable	Not applicable

Table 8 - Geographic Distribution

Rationale for the priorities for allocating investments geographically

The City of Biloxi does not allocate its CDBG resources based on geographic distribution but invests the funds to address high priority unmet community needs to benefit the largest number of low- to moderate-income residents possible.

AP-55 Affordable Housing – 91.220(g)

The City of Biloxi does not receive a HOME, ESG or HOPWA allocation. Because its CDBG allocation is invested to address high priority unmet community needs to benefit the largest number of low- to moderate-income residents possible, the City does not budgeted CDBG resources to produce, rehabilitate or acquire housing.

No applications were received to provide public service activities for housing services that would include preventing and addressing homelessness or providing affordable housing assistance to other Biloxi residents.

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

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

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

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

Discussion

Because its CDBG allocation is invested to address high priority unmet community needs to benefit the largest number of low- to moderate-income residents possible, the City does not budget CDBG resources to produce, rehabilitate or acquire housing.

AP-60 Public Housing – 91.220(h)

The Biloxi Housing Authority (BHA) Executive Director provided the City with a written update, which is the basis of information for this template. The City and BHA enjoy a good working relationship that includes on-going exchange of information, collaboration in implementing identified actions in the Join Analysis of Impediments to Fair Housing Choice and partnering to support public and assisted housing activities that benefit Biloxi residents.

BHA has successfully transitioned from the Public Housing platform to the Rental Assistance Demonstration (RAD) Project Based Section 8 platform and therefore no longer has traditional Public Housing units. In addition to RAD units, BHA offers VASH, Tenant-Based Section 8 vouchers, Low-Income Housing Tax Credit units and Affordable Market Rate units in the community.

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

During the Program Year 2023, Biloxi Housing Authority will continue to maintain its housing developments and will continue to explore the need for additional or replacement housing units. During the program year, BHA will continue its outreach efforts to expand landlord participation in the local voucher program to increase the number of housing units available to Tenant-Based Voucher recipients. The number of participated landlords has been on the decline due to extreme increases in insurance costs in the area, which among other factors has caused rent increases. The high rent for many local units is higher than the rents allowed under the voucher program, which reduces the number of affordable units in the area available for rental to Tenant-Based Voucher recipients.

To improve affordable housing resilience, the Biloxi Housing Authority will consider the cost and effectiveness of rehabilitating or retrofitting public housing units and office space to eliminate or at least reduce flood damage and decrease insurance costs. Retrofits that provide an acceptable level of flood damage protection, and warrant the high cost of improvements, may not be possible in the current economy. Concurrent with exploring those options, BHA also will consider relocating housing units and/or office space to areas outside of the flood zone, or to areas with more affordable insurance rates. The recent extreme increases in insurance pricing continues to threaten the sustainability of maintaining housing that is affordable in the area, and options are being discussed to redevelop housing in areas which will be more affordable to insure, and will reduce the threat of damage to BHA units.

However, locating available property that also is suitable to the BHA's needs is difficult and costly. To be most suitable for affordable housing residents, the property would be located on or near a regular bus route of Coast Transit Authority, have convenient access to a grocery store and supportive service providers and employers. The City supports the goal of locating affordable housing outside of special flood zone areas, but it may be cost prohibitive.

The BHA has purchased a new administrative office building located at 2130 Pass Road, Biloxi. The BHA is in the process of planning building renovations, which will allow all Administrative, Intake, Management, Maintenance and Finance staff to be housed in one central office, away from the threat of storm surge and in a building more resilient from damage. This will allow for operations to continue prior

to and after storm threats. This property is also more centrally located to allow for easier access by residents, and is located at a bus stop location for Coast Transit Authority.

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

The Biloxi Housing Authority will continue to support its Resident Councils and the Family Self-Sufficiency Program to encourage communication between residents and management and will continue to encourage participation of residents in available programs for self-sufficiency through referrals to other agencies in the community.

BHA will continue to refer interested public housing residents to local homeownership programs during PY2023 in spite of increased interest rates and flood insurance uncertainties that are impacting affordability of housing along the Mississippi Gulf Coast.

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

Not applicable

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

The City of Biloxi works with the Open Doors Homeless Coalition Continuum of Care and its member agencies and organizations to reduce and end homelessness in the City. According to the 2023 PIT Count coordinated by Open Doors, there was a total of 55 homeless persons in the City of Biloxi, five of whom were chronically homeless; four were veterans; six had a substance use disorder; five were survivors of domestic violence and fifteen were adults with serious mental illness. The other twenty homeless persons in the City were not identified as having another special need in addition to the lack of permanent housing.

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 need

The City of Biloxi's one-year goal for Program Year 2023 is to continue working with the Open Doors Homeless Coalition, the Biloxi Housing Authority, Back Bay Mission, Gulf Coast Center for Nonviolence, Coastal Family Health Center and other agencies and stakeholders to coordinate resources to meet the housing and supportive services needs of the City's homeless and near-homeless populations.

The City also will work with other local units of government, Open Doors Homeless Coalition, assisted housing agencies and others to address and prevent increased homelessness as a result of increasing costs of rent, food, insurance, transportation and an inadequate inventory of affordable housing.

The City did not receive any PY2023 public service applications requesting funding to provide housing assistance for Biloxi's homeless populations. The BHA, Open Doors and the City will continue to encourage the local Veterans Administration to expedite referrals so all VASH Vouchers are issued to benefit homeless veterans.

The City will continue to support funding applications submitted by qualified nonprofit agencies to help reduce the number of homeless persons in Biloxi by expanding access to affordable housing and will continue to encourage the Veterans Administration to expedite referrals so all VASH Vouchers may be issued to benefit homeless veterans.

Addressing the emergency shelter and transitional housing needs of homeless persons

The City will continue to participate as an active member of the Open Doors Homeless Coalition Continuum of Care and will support efforts of Open Doors, the Gulf Coast Center for Nonviolence (GCCN), Back Bay Mission, The Salvation Army and other organizations that provide housing and supportive services to:

- establish and operate an emergency shelter for Biloxi's homeless populations; and
- expand the inventory of transitional and permanent affordable housing for near-homeless and homeless populations in Biloxi.

The GCCN reported that its Biloxi emergency shelter served 261 adults and 175 children during 2022, which decreased to 166 adults and 106 children served in 2023. In terms of Nights of Service, 14,410 people were served in 2022 compared to 8,623 served in 2023, substantially fewer. However, the number of nonresidential clients served in Biloxi during 2023 increased to 476 for counseling and 111 for financial assistance compared to 342 for counseling and 100 for financial assistance in 2022.

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

The City of Biloxi will continue to work collaboratively with the Biloxi Housing Authority and Open Doors Homeless Coalition to encourage the Mississippi Gulf Coast's Veterans Administration to issue all of its VASH Vouchers as quickly as possible to benefit homeless veterans. The City also will continue to work with Open Doors to support services that expand access of homeless persons, especially chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth, to existing affordable housing units through rent, utility and security deposit assistance.

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.

Collaborating with Open Doors, the City will continue encouraging local housing services agencies to expand services to help 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. Assistance that includes rent, utility and security deposit grants, will expand access to affordable housing for low-income households as well as for those being discharged from publicly funded institutions and systems of care.

Discussion

The City of Biloxi will continue to support the public and private agencies that address housing, healthcare, public services, employment, education and youth needs by endorsing their applications for funding assistance and providing technical assistance as feasible with the City's limited staff and resources. The City also will continue to support the Biloxi Housing Authority's ongoing Community and Supportive Services activities and programs.

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

The City of Biloxi invests public resources to support efforts of its professional planning staff to keep apprised of legal decisions regarding land use at the local level as well as urban planning trends and policies that may change availability of affordable housing or impact individuals' property rights. Consideration is being given to allowing increased density in some lower-density residential zones to accommodate the increased number of VRBO conditional use requests and to allowing multiple principal uses on a single lot of record. Land use trends in other communities that permit or conditionally permit location of tiny houses and/or small studio housing units in certain residential zoning classifications with larger lot sizes may be studied as a possible means of supplementing property owners' income to ease increasing housing cost burdens.

Biloxi officials, planners and community development staff are aware of and considering how best to adapt local codes to meet the growing need to expand access to affordable housing for all income groups and to support construction of a wider range of housing types, which may include updating zoning classifications to expand options for development by right of affordable group homes and residential "compounds" that include 4 - 6 residential units with shared common areas.

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 worked with the Biloxi Housing Authority to develop the 2019 joint City of Biloxi-Biloxi Housing Authority Analysis of Impediments to Fair Housing Choice during 2018-2019, which includes a review of local land use controls, including zoning, ad valorem tax policies, building codes, user fees and charges, growth limitations and policies affecting return on residential investment. At that time, no zoning restrictions or limitations were identified as barriers to affordable housing.

Biloxi's official zoning district map allows for a mixture of single- and multi-family residential units on varying lot sizes throughout the City and group homes in more than one zone. Mixed use zoning is permitted with no parking requirements in the downtown area, which improves affordability of development and redevelopment in that zoning district.

The City has adopted the most current version of the International Building Code, which requires compliance with the Americans with Disabilities Act and Fair Housing Act provisions. Unlike construction costs and property insurance premiums, property taxes in Biloxi have not increased in more than 25 years.

Discussion

Increasing interest rates, climbing property insurance premiums, inflation and general concern about the economy have cooled the local real estate market. What was considered affordable housing in 2021 may now be cost prohibitive for potential buyers without a purchase contract that locks in the purchase price or a pre-approved, fixed, low-rate mortgage.

There are few single family housing and multifamily rental housing units under construction in the City of Biloxi, which may be impacted by unreliable availability of some construction materials as well as the increased costs of construction material and labor shortages, especially in skilled worker classifications.

AP-85 Other Actions – 91.220(k)

Information provided by the Open Doors Homeless Coalition is combined with other sources of updated data to address "Other Actions" in this template.

Actions planned to address obstacles to meeting underserved needs

The City of Biloxi will continue to work with other local units of government, supportive service agencies and faith-based organizations to share information about gaps in services and supplies to collaboratively meet the needs of underserved members of the community. Climbing interest rates, a lack of market stability and forecasts for economic recession are creating new challenges to meeting underserved needs as limited resources must be stretched even further than they were during the pandemic.

Actions planned to foster and maintain affordable housing

The City of Biloxi plans to continue working with the Biloxi Housing Authority, housing developers and realtors to encourage affordable infill housing development and it will consider zoning changes that allow

a wider range of affordable housing types throughout the City to meet the needs of different populations, including the elderly and those with special needs.

Actions planned to reduce lead-based paint hazards

The City of Biloxi will continue to support the efforts of the Mississippi State Department of Health (MSDH), the Biloxi Housing Authority and others to improve awareness among parents and caregivers about the hazards of lead-based paint (LBP) to children, especially those ages six and under, and pregnant women. Biloxi building codes require lead-based paint testing prior to rehabilitation of residential units built before 1979 and, if LBP positive, property owners are required to abate and dispose of LBP chips/dust or, to contain the LBP, in compliance with EPA standards.

Data for LBP testing of children residing in Biloxi area codes in 2020 was provided by the MSDH to the City in June 2022, identifying that of the 306 children age six and under who were tested for elevated blood lead levels, only one was identified with a venous lead level of 5 or higher and none were identified with venous lead levels of 15 or higher. This seems to indicate efforts to improve public awareness about permanent damage LBP poisoning can have on young children and pregnant women may be effective and should be continued. Accordingly, the City of Biloxi will continue to provide free brochures at City Hall and at the Biloxi permit counter regarding LBP poisoning hazards and symptoms of poisoning. The City also will continue to support's MSDH's Healthy Homes Program.

In July 2023, MSDH released City of Biloxi LBP testing information for 2018, 2019, 2020 (revised) and 2021 for children six years of age and younger. The total number tested each year includes capillary and venous and all blood lead levels (BLL) regardless of level, according to MSDH, and some years may include duplicates. In 2018, 773 children were tested in Biloxi and 35 (4.5%) had a BLL high enough to indicate LBP poisoning. In 2019, 636 children were tested with 35 (5.5%) indicating LBP poisoning; in 2020, 322 were tested with 13 (4.0%) with a BLL high enough to indicate poisoning; and in 2021, 317 were tested and 5 (1.5%) had a BLL high enough to indicate poisoning.

All RAD units owned by the Biloxi Housing Authority have been assessed and LBP hazards have been abated.

Actions planned to reduce the number of poverty-level families

The City will continue to collaborate with Open Doors, and its other member agencies and organizations, to provide residents with needed housing assistance and other supportive services to help break the cycle of poverty. The City also will continue to encourage faith-based organizations to work collaboratively with local units of government, public and private agencies and other community groups to expand availability of resources as needs are increasing along with costs of food, housing and transportation.

Those able to work will be encouraged to participate in existing no-cost or low-cost workforce development and job skills training programs to expand their employment opportunities. There is no debate that the high cost of daycare services is an obstacle in the path to employment for many parents.

The City's award of public services funding to Moore Community House for its affordable early childcare program allows parents whose children participate in the program to maintain employment. The City will

continue to encourage this kind of support from other agencies and organizations to expand access to affordable early childhood education and to encourage parents to enroll children in kindergarten readiness programs to improve their opportunity for success in school; education continues to be a powerful tool for reducing poverty.

The City also will continue to encourage its residents to explore resources and services available through many local organizations, including The Salvation Army-Biloxi, Back Bay Mission, Loaves and Fishes, programs funded by the United Way of South Mississippi, and the Gulf Coast Community Action Agency (GCCAA). For example, the GCCAA offers income-eligible residents assistance paying rent, utility and deposit fees and provides opportunities for improving workforce skills and finding employment. The GCCAA also helps low-income residents, including senior citizens and those with disabilities, apply for other non-profit resources and assistance programs to address specific needs.

The City also will continue to support participation of the Biloxi Housing Authority in the HUD/HCV Family Self Sufficiency Program as part of its effort to reduce the number of poverty-level families.

Actions planned to develop institutional structure

The City will continue to collaborate with Open Doors Homeless Coalition and its other member agencies and organizations to fill gaps in the institutional structure, which include the lack of emergency shelter beds and only limited inventory of available transitional housing. The City plans to continue supporting grant application efforts submitted by local public and private agencies to access additional resources to meet residents' basic needs, especially the basic needs of the 14.9% of residents living in poverty, according to Census data 5-Year Estimates for 2017-2021.

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

Participating in activities and meetings of the Open Doors Homeless Coalition Continuum of Care enhances communication and coordination between public and private housing and social service agencies. The annual Point in Time homeless population count and on-going supportive service activities require collaboration among agencies and the City to maximize investment of public and private resources to generate maximum benefits for those with unmet needs.

The City also will continue participating in the numerous food, clothing and toy drives and other initiatives organized by both the public and private sector throughout the year to demonstrate its commitment to assisting its underserved residents and to encourage others to join the community effort.

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

The City of Biloxi received a PY2023 CDBG allocation from HUD of \$404,451 and anticipates generating approximately \$175,784 in program income. The City also anticipates carrying over an estimated \$61,952 in previously budgeted but unexpended PY2022 CDBG allocated funds and program income and reallocating them to support PY2023 projects.

In Program Year 2023, the City of Biloxi budgeted available CDBG resources as follows:

Administration \$100,000;

Public Services for non-housing activities \$70,000.

East Biloxi East-West Neighborhood Access Road Project Phase II (between Hopkins Boulevard and Porter Avenue) \$486,900 (subject to approval of substantial amendment #1)

(Sources of funds for Phase II of the Access Road Project include \$234,451 in 2023 entitlement allocation funds; \$175,784 in program income anticipated to be generated; and \$61,952 in carryover of previously allocated but unexpended funds from PY2022.)

Substantial Amendment #1 to the 2023 Action Plan proposes to add a new project, "Public Safety Improvements - Acquisition of Fire Truck," that would be paid for over three Program Years 2023, 2024 and 2025. The first payment in PY2023 is \$959,995. Through substantial amendment #1, available PY2023 CDBG resources will be budgeted for the first payment.

Both the second and third year fire truck payments are anticipated to be made in PY2024 and PY2025, and (as of December 20, 2023) are estimated to be approximately \$400,000.

Community Development Block Grant Program (CDBG)

Reference 24 CFR 91.220(I)(1)

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

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

Other CDBG Requirements

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

The City of Biloxi has identified the one-year period 2023 for determining Overall Benefit of CDBG funds to persons of low- to moderate-income.

Attachments*

Citizen Participation Documentation

Maps

HUD Forms and Certifications

***In the final, adoption version of the 2023 Action Plan, these attachments will be updated to include Substantial Amendment #1 citizen outreach and participation documentation and a map identifying the project service area for the new “Public Safety Improvements – Fire Truck Acquisition” Project.**