



**2023-2027 Consolidated Plan
2023 Annual Action Plan**

Community and Housing Development Department
City of Mobile
April 25, 2023

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Executive Summary

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

1. Introduction

The City of Mobile's Consolidated Housing and Community Development Plan is a community-based plan addressing the City's housing, homelessness, and non-housing community development needs for the five-year period (2023-2027). The plan contains goals, measurable objectives, and implementation strategies for the plan's elements. Additionally, the plan contains a One-Year Action Plan describing the activities the City will fund, implement, or support the implementation of in 2023-2024.

The plan complies with Consolidated Plan regulations (24 CFR Part 91) issued by the U.S. Department of Housing and Urban Development. HUD requires entitlement communities such as the City of Mobile to consolidate its planning, application, and reporting requirements for most HUD programs, including the Community Development Block Grant (CDBG), HOME Investment Partnerships Act (HOME), and Emergency Solutions Grant (ESG) programs. In addition, the AP plan must be updated each year, if necessary, adopted by the City Council and submitted to HUD prior to the beginning of the City's program year or within 60 days of the allocation of funds.

The 2023-2027 Consolidated Plan builds upon some existing plans adopted by the City Council. These include the 2017-2022 Consolidated Plan, Analysis of Impediments, Map for Mobile Comprehensive Plan, and the Continuum of Care (CoC) ten-year plan to eliminate homelessness.

Neighborhood Revitalization Strategy Area (NRSA)

As part of this plan, the City is renewing the designated Neighborhood Revitalization Strategy Area in accordance with the terms of 24 CFR 91.215(e) (2) and CPD Notice 96-01. This area comprises those census tracts and neighborhoods where measures of income, employment, housing standards, abandoned and unmaintained vacant lots, public safety, Brownfield sites, and other neighborhood quality benchmarks lag behind city-wide averages. The City is actively engaged within this area in creating partnerships with stakeholders to create the conditions needed for wholesale neighborhood revitalization.

Priority Goals

The City, in collaboration with community stakeholders, identified key goals as priorities in the Analysis of Impediments and Consolidated Plan. The specific goals identified as priorities are listed in section **SP-25** of this Consolidated Plan.

Annual (2023-2024) Action Plan

The 2023-2024 Annual Action Plan describes how the CDBG, HOME, and ESG program funds will be used to address City's housing, homelessness, and non-housing community development goals and objectives. The City of Mobile's 2023-2024 one-year Action Plan was approved by the Mobile City Council on February 7, 2023. The Consolidated Plan is an administrative tool and was administratively accepted on this date. The resolution adopting the plan is included as part of this plan.

2. Summary of the objectives and outcomes identified in the Plan Needs Assessment Overview

Affordable Housing: Provide opportunities for rehabilitation of owner-occupied housing, and development of affordable housing. Planned activities include supporting and funding affordable development and rehab throughout the city, track affordable housing developments to inform planning efforts, leverage funding sources for housing to encourage development, and promote affordable housing near high-quality schools and/or places of employment.

Homelessness: Assist persons who are homeless or at risk of being homeless by providing housing, housing assistance, and/or client centered services.

Public Facilities and Infrastructure: Support improvements to neighborhoods, community assets and facilities to reduce neighborhood disparities, improve access to transit, and provide safe community spaces.

Economic Development: Provide greater access to education, workforce, and business opportunities. Potential activities include workforce development and job training, continue partnerships with community colleges and employers, and target Section 3 and women and minority-owned businesses for City contracts.

Fair Housing and Lending: Increase community engagement related to fair housing awareness and planning. Planned activities include participating in fair housing month, community development week and actively encouragement in community planning activities.

Administration and Planning: Prioritize overall coordination of program management and oversight for the successful administration of Federal, state, and local funded programs. Planned activities include increase coordination with City Departments and City/Regional Entities, and fair housing and community development advocates and service providers.

3. Evaluation of past performance

The City of Mobile made progress on its goals from the 2018-2022 Consolidated Plan. The Community and Housing Development Department invested in the development of new affordable housing units and provided rehabilitation to low-income homeowners. However, the community health and economic challenges that arose during 2020 and 2021 as a result of the COVID pandemic and subsequent housing

market impacts made it difficult to make substantial progress on affordable housing development. The City managed additional funding for CDBG and ESG received through the CARES Act to provide support to renters unable to make payments and at-risk for homelessness, as well as rehousing homeless individuals and families.

Owner-occupied Rehabilitation activities were limited during the pandemic, but the City was able to continue to progress although the program could only complete exterior work on home. This did provide opportunity to help address roofing issues that would have otherwise been cost prohibitive. In just the last program year, the Community and Housing Development Department completed 170 roof repairs and replacements for low-income homeowners. The City hopes to expand the program to include other critical systems, such as HVAC, electrical and plumbing in the coming program years.

The City also made a concentrated effort to reduce the number of blighted and abandoned properties throughout the jurisdiction. Surveys were implemented and completed annually, tracking homes that had ongoing code violations or major repair needs and identifying properties by the level of blight recorded. Assistance provided for blight removal from the City was based on household income, with priority given to senior and disabled households. Since the 2018-2022 Consolidated Plan, the City of Mobile has reduced the number of blighted properties from 1625 to 850 housing units.

As programs return to pre-pandemic activities, the City expects to build momentum from the achievements made during the 2018-2022 Consolidated Plan period. An additional Community Housing Development Organization (CHDO), Alethia House, expanded service area to include Mobile and was certified to work on affordable housing within Mobile. And the City released changes to the zoning code that allows for greater flexibility in unit types and square footage built on lots. The Community and Housing Development Department hopes to leverage these and other successes to build programs and policies that support greater supply and access to affordable housing across Mobile.

4. Summary of citizen participation process and consultation process

In preparing the 2023-2027 Consolidated Plan and Annual Action Plan, the City of Mobile's Community and Housing Development Department conducted the following:

- PY23 Action Plan Hearing Public Notice advertised in the Mobile Press Register on October 5, 2022
- PY23 Action Plan Hearing: October 19, 2022
- PY23 Action Plan Technical Assistance Workshop Public Notice advertised in the Mobile Register on October 5, 2022
- PY23 Action Plan Technical Assistance Workshop: November 15, 2022
- PY23 Action Plan Hearing Public Notice advertised in the Mobile Register on December 28, 2022
- PY23 Action Plan Hearing: January 12, 2023
- Consultations with Stakeholders and City Staff: January 2023 – March 2023
- Community Housing and Needs Assessment Survey: February 1, 2023 - February 15, 2023
- City Council approval and public meeting: February 7, 2023

- Review and public comment period: March 15, 2023 - April 20, 2023
- 2023-2027 Consolidated Plan and PY2023 Annual Action Plan submitted to HUD: April 25, 2023

The Community and Housing Development Department maintains a stakeholder contact list for housing and service providers within the City of Mobile. Stakeholders were notified via email of public meetings, consultation requests, and surveys. Additionally, public notices were published in the Mobile Register and on the City of Mobile website.

5. Summary of public comments

See Appendix for summary of public comments.

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

See Appendix for summary of public comments.

7. Summary

The overall goal of the housing, homeless, economic development, administrative and planning programs covered by the Five-Year Consolidated Plan is to strengthen and further develop partnerships among all levels of government and the private sector. The City of Mobile aims to enable for-profit and non-profit organizations to provide decent housing, improve neighborhoods and living environments, and extend economic opportunities for every resident. The Five-Year Consolidated Planning process requires the City to state in a single document its strategy to pursue goals for all housing, community development, and planning programs. The City will use the Consolidated Plan's goals and objectives to allocate the next five (5) years of CDBG, HOME, and ESG funds and to provide direction to other partners addressing the housing and community development needs of the low- and moderate-income population of the City of Mobile. HUD will evaluate the City's performance under the Five-Year Consolidated Plan against these goals.

The Process

PR-05 Lead & Responsible Agencies 24 CFR 91.200(b)

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

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	MOBILE	
CDBG Administrator	MOBILE	Community and Housing Development Department
HOME Administrator	MOBILE	Community and Housing Development Department
ESG Administrator	MOBILE	Community and Housing Development Department
HOPWA Administrator		
HOPWA-C Administrator		

Table 1 – Responsible Agencies

Narrative

The City of Mobile receives grant funding from the U.S. Department of Housing and Urban Development (HUD) for the CDBG, HOME and ESG programs on an annual cycle. The Community and Housing Development Department, under the Neighborhood Development Department, is responsible for the administration of each grant program on behalf of the City. Mobile does not currently receive HOPWA funds.

Consolidated Plan Public Contact Information

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PR-10 Consultation – 91.100, 91.110, 91.200(b), 91.300(b), 91.215(I) and 91.315(I)

1. Introduction

The City of Mobile's Community and Housing Development Department (CHD) incorporated data and feedback from stakeholders, residents, and other agencies and departments to inform the Consolidated Plan. In addition to interviews and public meetings, CHD also consulted current planning efforts throughout the community to align strategies and identify opportunities to build on existing investments and programs. CHD will continue to collaborate with Mobile Housing Authority, Mobile County, Mobile-Mobile County-Baldwin County Continuum of Care, AIDS Alabama South, and other City of Mobile Departments, including Build Mobile, Civic Engagement, and Procurement to drive strategic investment throughout Mobile.

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

Throughout the Analysis of Impediments to Fair Housing and Consolidated Plan process, the City of Mobile's Community and Housing Development Department consulted with the Mobile Housing Authority, Mobile-Mobile County-Baldwin County Continuum of Care, AIDS Alabama South, a variety of service providers and advocacy organizations, and other City of Mobile Departments, including Build Mobile and Procurement.

The Community and Housing Development Department coordinated with the above organizations and departments to identify local housing, economic development, community development, public health, infrastructure (including access to broadband internet), and hazard mitigation needs.

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 works in collaboration with Mobile Housing Authority, and Continuum of Care Agencies, nonprofit and for profit assisted housing developers, Mobile County Health Department, University of South Alabama Hospital, AltaPoint Mental Health Systems, and subrecipient agencies through community planning process, and funding. The City provides CDBG, HOME and ESG funds to some of these agencies, including Annual Performance Contract funds.

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

The City is an equal partner in the City of Mobile, Mobile County, and Baldwin County Continuum of Care (CoC) organization and is represented on the Board. The City also participates in the CoC's planning process and activities designed to end homelessness within ten years, as well as works with other CoC member organizations to implement and ensure compliance with the Homeless Management Information System (HMIS). The City is collaborating with the CoC agencies to address the need for permanent housing for homeless persons, chronically homeless persons, and those at risk of becoming homeless.

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

1	Agency/Group/Organization	Affordable Homes Gulf Coast
	Agency/Group/Organization Type	Housing Service- Housing
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Market Analysis
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	The organization was consulted to provide qualitative and quantitative data for the Analysis of Impediments and Consolidated Plan. The goal of this outreach was to find areas of consensus among stakeholders and identify potential policy initiatives to further fair housing and community development activities throughout Mobile.
2	Agency/Group/Organization	AIDS ALABAMA
	Agency/Group/Organization Type	Services-Persons with HIV/AIDS
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Non-Homeless Special Needs
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	The organization was consulted to provide qualitative and quantitative data for the Analysis of Impediments and Consolidated Plan. The goal of this outreach was to find areas of consensus among stakeholders and identify potential policy initiatives to further fair housing and community development activities throughout Mobile.

3	Agency/Group/Organization	Alethia House
	Agency/Group/Organization Type	Housing Service- Housing
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Market Analysis
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	The organization was consulted to provide qualitative and quantitative data for the Analysis of Impediments and Consolidated Plan. The goal of this outreach was to find areas of consensus among stakeholders and identify potential policy initiatives to further fair housing and community development activities throughout Mobile.
4	Agency/Group/Organization	Bishop Community College
	Agency/Group/Organization Type	Services-Education Services-Employment Major Employer
	What section of the Plan was addressed by Consultation?	Economic Development Education
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	The organization was consulted to provide qualitative and quantitative data for the Analysis of Impediments and Consolidated Plan. The goal of this outreach was to find areas of consensus among stakeholders and identify potential policy initiatives to further fair housing and community development activities throughout Mobile.
5	Agency/Group/Organization	Boys and Girls Club of South Alabama
	Agency/Group/Organization Type	Services-Children Foundation
	What section of the Plan was addressed by Consultation?	Anti-poverty Strategy
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	The organization was consulted to provide qualitative and quantitative data for the Analysis of Impediments and Consolidated Plan. The goal of this outreach was to find areas of consensus among stakeholders and identify potential policy initiatives to further fair housing and community development activities throughout Mobile.

6	Agency/Group/Organization	Center for Fair Housing, Inc.
	Agency/Group/Organization Type	Housing Service-Fair Housing
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Market Analysis
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	The organization was consulted to provide qualitative and quantitative data for the Analysis of Impediments and Consolidated Plan. The goal of this outreach was to find areas of consensus among stakeholders and identify potential policy initiatives to further fair housing and community development activities throughout Mobile.
7	Agency/Group/Organization	Center for Healthy Communities, University of South Alabama
	Agency/Group/Organization Type	Services-Education Services-Health
	What section of the Plan was addressed by Consultation?	Non-Homeless Special Needs Economic Development Anti-poverty Strategy
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	The Center was consulted to provide qualitative and quantitative data for the Analysis of Impediments and Consolidated Plan. The goal of this outreach was to find areas of consensus among stakeholders and identify potential policy initiatives to further fair housing and community development activities throughout Mobile.
8	Agency/Group/Organization	Mobile Chamber of Commerce
	Agency/Group/Organization Type	Business and Civic leaders Regional Organization Planning Organization
	What section of the Plan was addressed by Consultation?	Economic Development Anti-poverty Strategy

	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	The organization was consulted to provide qualitative and quantitative data for the Analysis of Impediments and Consolidated Plan. The goal of this outreach was to find areas of consensus among stakeholders and identify potential policy initiatives to further fair housing and community development activities throughout Mobile.
9	Agency/Group/Organization	City of Mobile ADA Coordinator
	Agency/Group/Organization Type	Services-Persons with Disabilities Other government - Local
	What section of the Plan was addressed by Consultation?	Non-Homeless Special Needs
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	The organization was consulted to provide qualitative and quantitative data for the Analysis of Impediments and Consolidated Plan. The goal of this outreach was to find areas of consensus among stakeholders and identify potential policy initiatives to further fair housing and community development activities throughout Mobile.
10	Agency/Group/Organization	City of Mobile Chief Resilience Officer
	Agency/Group/Organization Type	Other government - Local
	What section of the Plan was addressed by Consultation?	Market Analysis Hazard mitigation and floodplain management (other)
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	The organization was consulted to provide qualitative and quantitative data for the Analysis of Impediments and Consolidated Plan. The goal of this outreach was to find areas of consensus among stakeholders and identify potential policy initiatives to further fair housing and community development activities throughout Mobile.
11	Agency/Group/Organization	Fuse Project
	Agency/Group/Organization Type	Services-Children Services-Education Foundation

	What section of the Plan was addressed by Consultation?	Non-Homeless Special Needs Economic Development Anti-poverty Strategy
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	The organization was consulted to provide qualitative and quantitative data for the Analysis of Impediments and Consolidated Plan. The goal of this outreach was to find areas of consensus among stakeholders and identify potential policy initiatives to further fair housing and community development activities throughout Mobile.
12	Agency/Group/Organization	Housing First, Inc
	Agency/Group/Organization Type	Housing Services-Victims of Domestic Violence Services-homeless Services-Health Services-Education Services-Employment Services - Victims
	What section of the Plan was addressed by Consultation?	Homelessness Strategy Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	The organization was consulted to provide qualitative and quantitative data for the Analysis of Impediments and Consolidated Plan. The goal of this outreach was to find areas of consensus among stakeholders and identify potential policy initiatives to further fair housing and community development activities throughout Mobile.
13	Agency/Group/Organization	Legal Services Alabama
	Agency/Group/Organization Type	Housing Service-Fair Housing
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Market Analysis

	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	The organization was consulted to provide qualitative and quantitative data for the Analysis of Impediments and Consolidated Plan. The goal of this outreach was to find areas of consensus among stakeholders and identify potential policy initiatives to further fair housing and community development activities throughout Mobile.
14	Agency/Group/Organization	Lifelines Counseling Services
	Agency/Group/Organization Type	Service-Counseling Service-Fair Housing Other – 2-1-1
	What section of the Plan was addressed by Consultation?	Market Analysis Non-Homeless Special Needs Economic Development Anti-poverty Strategy
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	The organization was consulted to provide qualitative and quantitative data for the Analysis of Impediments and Consolidated Plan. The goal of this outreach was to find areas of consensus among stakeholders and identify potential policy initiatives to further fair housing and community development activities throughout Mobile.
15	Agency/Group/Organization	MLK Avenue Redevelopment Corporation
	Agency/Group/Organization Type	Housing Service- Housing
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Market Analysis
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	The organization was consulted to provide qualitative and quantitative data for the Analysis of Impediments and Consolidated Plan. The goal of this outreach was to find areas of consensus among stakeholders and identify potential policy initiatives to further fair housing and community development activities throughout Mobile.
16	Agency/Group/Organization	Mobile County Government
	Agency/Group/Organization Type	Housing Other government - County

	What section of the Plan was addressed by Consultation?	Housing Need Assessment Lead-based Paint Strategy
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	The organization was consulted to provide qualitative and quantitative data for the Analysis of Impediments and Consolidated Plan. The goal of this outreach was to find areas of consensus among stakeholders and identify potential policy initiatives to further fair housing and community development activities throughout Mobile.
17	Agency/Group/Organization	Mobile Housing Authority
	Agency/Group/Organization Type	PHA Services - Housing Services-Children Services-Elderly Persons Services-Employment Resident Board
	What section of the Plan was addressed by Consultation?	Public Housing Needs Economic Development Anti-poverty Strategy
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	The organization was consulted to provide qualitative and quantitative data for the Analysis of Impediments and Consolidated Plan. The goal of this outreach was to find areas of consensus among stakeholders and identify potential policy initiatives to further fair housing and community development activities throughout Mobile.
18	Agency/Group/Organization	DUMAS WESLEY DBA SYBIL SMITH FAMILY VILLAGE
	Agency/Group/Organization Type	Housing Services - Housing Services-Children Services-Victims of Domestic Violence Services-homeless Services - Victims
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Homelessness Strategy Homeless Needs - Families with children

	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	The organization was consulted to provide qualitative and quantitative data for the Analysis of Impediments and Consolidated Plan. The goal of this outreach was to find areas of consensus among stakeholders and identify potential policy initiatives to further fair housing and community development activities throughout Mobile.
19	Agency/Group/Organization	Providence Hospital Outreach - Guadalupe Center
	Agency/Group/Organization Type	Healthcare Services-Low income households (Other)
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Non-Homeless Special Needs
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	The organization was consulted to provide qualitative and quantitative data for the Analysis of Impediments and Consolidated Plan. The goal of this outreach was to find areas of consensus among stakeholders and identify potential policy initiatives to further fair housing and community development activities throughout Mobile.
20	Agency/Group/Organization	Salvation Army of Coastal Alabama
	Agency/Group/Organization Type	Services-Children Services-Elderly Persons Services-Employment Services - Housing Services-Homeless Services-Veterans
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Homelessness Strategy Non-Homeless Special Needs
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	The organization was consulted to provide qualitative and quantitative data for the Analysis of Impediments and Consolidated Plan. The goal of this outreach was to find areas of consensus among stakeholders and identify potential policy initiatives to further fair housing and community development activities throughout Mobile.

21	Agency/Group/Organization	Sold by Ellis G Realty
	Agency/Group/Organization Type	Housing Real Estate Organization (Other)
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Market Analysis
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	The agency was consulted to provide qualitative and quantitative data for the Analysis of Impediments and Consolidated Plan. The goal of this outreach was to find areas of consensus among stakeholders and identify potential policy initiatives to further fair housing and community development activities throughout Mobile.
22	Agency/Group/Organization	Toulminville-Crichton CDC
	Agency/Group/Organization Type	Housing Services-Children Services-Elderly Persons Services-Education
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Non-Homeless Special Needs Economic Development
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	The organization was consulted to provide qualitative and quantitative data for the Analysis of Impediments and Consolidated Plan. The goal of this outreach was to find areas of consensus among stakeholders and identify potential policy initiatives to further fair housing and community development activities throughout Mobile.
23	Agency/Group/Organization	United Methodist Inner City Mission
	Agency/Group/Organization Type	Housing Services-Children Services-Elderly Persons Services-Education Services-Employment
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Non-Homeless Special Needs Economic Development

	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	The organization was consulted to provide qualitative and quantitative data for the Analysis of Impediments and Consolidated Plan. The goal of this outreach was to find areas of consensus among stakeholders and identify potential policy initiatives to further fair housing and community development activities throughout Mobile.
24	Agency/Group/Organization	United Way of SW AL
	Agency/Group/Organization Type	Services - Housing Services-Children Services-Elderly Persons Services-Persons with Disabilities Services-Education Services-Employment Foundation
	What section of the Plan was addressed by Consultation?	Non-Homeless Special Needs Economic Development Anti-poverty Strategy
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	The organization was consulted to provide qualitative and quantitative data for the Analysis of Impediments and Consolidated Plan. The goal of this outreach was to find areas of consensus among stakeholders and identify potential policy initiatives to further fair housing and community development activities throughout Mobile.
25	Agency/Group/Organization	Volunteers of America Southeast
	Agency/Group/Organization Type	Housing Services - Housing Services-Elderly Persons Services-Persons with Disabilities Regional organization
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Non-Homeless Special Needs

	<p>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</p>	<p>The organization was consulted to provide qualitative and quantitative data for the Analysis of Impediments and Consolidated Plan. The goal of this outreach was to find areas of consensus among stakeholders and identify potential policy initiatives to further fair housing and community development activities throughout Mobile.</p>
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Table 2 – Agencies, groups, organizations who participated

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

The City of Mobile reached out to and consulted all agencies that it felt would be impacted by the goals and activities in the Consolidated Plan.

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	Housing First, Inc.	The City cooperates with Mobile County and Baldwin County on the homelessness planning process and related program implementation. The Continuum of Care (CoC) represents the City of Mobile, Mobile and Baldwin Counties and small jurisdictions within them.
Analysis of Impediments to Fair Housing	City of Mobile Community and Housing Development	The strategic plan was directly informed by the goals outlined in the Analysis of Impediments which was developed in 2023 and have been included within the goals for the Consolidated Plan.
Capital Improvement Plan	City of Mobile Planning and Development Department	The City of Mobile maintains a five-year Capital Improvement Program to address infrastructure repair/upgrade needs throughout Mobile with projects addressing transportation, parks and greenways, public facilities, and environmental improvements. These efforts were considered in the development of the strategic plan and Consolidated Plan goals for infrastructure and facilities.
Annual Action Plan	Mobile Housing Authority	The strategic plan goals associated with public housing and affordable housing were informed by the goals set out in the Mobile Housing Authority's 2023 Annual Action Plan and expected outcomes through 2026.

Table 3 – Other local / regional / federal planning efforts

Describe cooperation and coordination with other public entities, including the State and any adjacent units of general local government, in the implementation of the Consolidated Plan (91.215(I))

The City cooperates with the Alabama Department of Economic and Community Affairs (ADECA) through review of the State ESG and Low-Income Housing Tax Credit allocations and application requirements. The City cooperates with Mobile County and Baldwin County on the homelessness planning process and related program implementation. Mobile County represents several smaller units of governments and was given opportunity to provide comment on the plan. The Continuum of Care (CoC) represents the City of Mobile, Mobile and Baldwin Counties and small jurisdictions within them.

Narrative (optional):

PR-15 Citizen Participation – 91.105, 91.115, 91.200(c) and 91.300(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 of Mobile's Community and Housing Development Department used the Analysis of Impediments to Fair Housing (AI) and Consolidated Plan development process as a means to engage with the community in an array of activities, including a series of interviews, meetings, and a survey. These activities allowed the City to reach a diverse set of citizens by providing community members with a number of ways to provide additional data to inform the process. To inform this Consolidated Plan, 25 organizations active in housing, community development, fair housing, and public service activities were interviewed. The City held three community and public meetings and conducted a public survey that garnered 137 survey responses.

As noted above, the City of Mobile's Community and Housing Development Department built on the community engagement activities of the AI to gather additional information and further understand the community development needs in and around Mobile, Alabama. The information gathered through stakeholder outreach and public meetings provided important qualitative data and directly informed the goal-setting for the Consolidated Plan. Community engagement activities provided additional information on the need for quality affordable housing and insight into organizational capacity and community development needs.

Citizen Participation Outreach

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Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
1	Stakeholder Interviews	Community Development Practitioners	A series of stakeholder interviews were conducted with 21 individuals representing 18 organizations who are active in housing, community development, fair housing, and public service activities in Mobile and the region. These interviews were held in person and via phone from January 20, 2023 through March 3, 2023.	Please see summary of comments attached.	N/A	

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Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
2	Public Meeting	Non-targeted/broad community	Community Meeting October 19, 2022 - The City of Mobile hosted a community meeting to provide residents with an overview of the AI and Consolidated Plan process and current initiatives. The community was also asked to provide feedback on process and ask questions.	Please see summary of comments attached.	N/A	
3	Public Meeting	Non-targeted/broad community	Community Meeting November 15, 2022 - The City of Mobile hosted a community meeting at Government Plaza to provide an opportunity for community organizations to gain technical assistance for annual program applications.	Please see summary of comments attached.	N/A	

2023-2027 Consolidated Plan

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
4	Public Meeting	Non-targeted/broad community	Community Meeting February 7, 2023 - The City of Mobile hosted a community meeting at Government Plaza to provide an opportunity for public comment on the allocation budget proposed for Council approval.	Please see summary of comments attached.	N/A	
5	Newspaper Ad	Non-targeted/broad community	Published notice on March 15, 2023 for public comment	Please see summary of comments attached.	N/A	

Table 4 – Citizen Participation Outreach

Needs Assessment

NA-05 Overview

Needs Assessment Overview

The needs assessment examines needs related to affordable housing, special needs housing, community development, and homelessness in Mobile, Alabama. The Needs Assessment includes the following sections:

- Housing Needs Assessment (NA-10)
- Disproportionately Greater Need: Housing Problems (NA-15)
- Disproportionately Greater Need: Severe Housing Problems (NA-20)
- Disproportionately Greater Need: Housing Cost Burdens (NA-25)
- Disproportionately Greater Need: Discussion (NA-30)
- Public Housing (NA-35)
- Homeless Needs Assessment (NA-40)
- Non-Homeless Special Needs Assessment (NA-45)
- Non-Housing Community Development Needs (NA-50)

The Needs Assessment identifies community needs and aids in prioritizing those needs which will form the basis for the Strategic Plan section, as well as the programs and projects to be administered. Most of the data in this section is populated using data from the 2017-2021 American Community Survey (ACS) and the 2015-2019 Comprehensive Housing Affordability Strategy (CHAS) datasets. The ACS and the CHAS datasets are both developed by the Census Bureau, with the CHAS dataset being developed specifically for HUD and its partners.

The housing portion of the Needs Assessment focuses largely on households experiencing a housing problem. There are four types of housing problems as defined by HUD:

1. Housing unit lacks complete kitchen facilities: A complete kitchen consists of a sink with a faucet, a stove or range, and a refrigerator
2. Housing unit lacks complete plumbing facilities: Complete plumbing consists of hot and cold running water, a flush toilet, and a bathtub or shower
3. Household is overcrowded: More than one person per room
4. Household is cost-burdened: Monthly housing costs (including utilities) exceeding 30% of monthly income.

The four severe housing problems include:

1. Housing unit lacks complete kitchen facilities

2. Housing unit lacks complete plumbing facilities
3. Household is severely overcrowded: More than 1.5 persons per room
4. Household is severely cost-burdened: Monthly housing costs (including utilities) exceeding 50% of monthly income.

The Needs Assessment is tied closely to Federal community development entitlement programs. These programs have income limits which are established by HUD. These limits are based on the area median income (AMI) and are adjusted when considering family size. Generally, when speaking about income brackets for these programs, there are three categories:

- Extremely low income – less than or equal to 30% AMI
- Very low income – 31-50% AMI
- Low income – 51-80% AMI

The CDBG and HOME programs target low-income and moderate-income beneficiaries. With the caveat that HOME rental activities may include beneficiaries with income of up to 60% AMI. ESG activities are assumed to benefit only low-income and moderate-income persons.

Persons in Family	30% AMI	50% AMI	80% AMI
1	13,750	22,900	36,600
2	18,310	26,150	41,800
3	23,030	29,400	47,050
4	27,750	32,650	52,250
5	32,470	35,300	56,450
6	37,190	37,900	60,650
7	40,500*	40,500	64,800
8	43,100*	43,100	69,000

Table 5- HUD income limits for Mobile, AL, 2022

*The FY 2014 Consolidated Appropriations Act changed the definition of extremely low-income to be the greater of 30/50ths (60 percent) of the Section 8 very low-income limit or the poverty guideline as established by the Department of Health and Human Services (HHS), provided that this amount is not greater than the Section 8 50% very low-income limit. Consequently, the extremely low income limits may equal the very low (50%) income limits.

NA-10 Housing Needs Assessment - 24 CFR 91.205 (a,b,c)

Summary of Housing Needs

Roughly 44% of all households in Mobile live above 100% of area median household income, while 47% of Mobile households live with incomes below 80% of the median. Of all Mobile households:

- 16.6% are very-low-income (<30% median household income)
- 13.8% are low income (30-50% median household income)
- 16.4% are moderate-income (50-80% median household income)

Just over 36% of all households in Mobile are small family households, consisting of two to four members. Of all small family households, 37% earn less than 80% of the household median income. There are 9,389 households (12% of all households) in Mobile that have one or more children six years old or younger. Of those households with a child six or younger, 52% earn less than 80% of the area median household income.

Housing Needs Summary Tables

There are 24,888 income earning households that rent in Mobile earning less than 100% AMI. Excluding zero-income renter households, 14,495, or 42% renter households are either cost burdened ($\leq 30\%$) or severely cost burdened ($\leq 50\%$). Those households earning 0-50% AMI are most likely to be paying more than 30% of household income towards housing costs.

There are 16,362 income earning households that own their home in Mobile earning less than 100% AMI. Excluding zero-income households, 6,463, or 40% of owner households earning less than 100% AMI are cost burdened or severely cost burdened.

There are 9,425 renter households earning less than 100% AMI and have one or more of the four housing problems at the severe level. These households represent 35% of all renter households with income earning less than 100% AMI. There are 3,480 owner households with income earning less than 100% AMI that have one or more of the four severe housing problems. These households make up 21% of all owner households with income earning less than 100% AMI.

Renter Households

Of the 21,395 renter households earning less than 80% AMI, 15,560 (73%) households spend at least 30% on housing costs each month. Small, related households make up 33% of all cost burdened households earning 80% or less AMI, while the "Other" category makes up 37%. The "Other" category consists of single person households and households that are comprised of unrelated individuals living together.

Roughly 35% of rental units are affordable to renter households earning 50% AMI and 11% are affordable to households earning 30% AMI.

Owner Households

Of the 12,269 owner households earning less than 80% AMI, 52%, or 6,330 households spend at least 30% on housing costs each month. When looking only at owner households at the 30% cost burden level earning less than 80% AMI, elderly households make up 44% of the total and small family households make up 29% of the total.

Of the owner households making less than 80% AMI, 27%, or 3,265 spend more than 50% of their household income each month on housing costs. Severely cost burdened owner households are mostly small, related households (22%), elderly (47%), and other non-elderly, non-family (28%).

Demographics	Base Year: 2017	Most Recent Year: 2021	% Change
Population	192,085	187,445	-2.4%
Households	76,097	77,515	1.9%
Median Income	\$40,020	\$44,780	11.9%

Table 6 – Housing Needs Assessment Demographics

Data Source: 2013-2017 ACS & 2017-2021 ACS

Number of Households Table

	0-30% HAMFI*	>30-50% HAMFI	>50-80% HAMFI	>80- 100% HAMFI	>100% HAMFI
Total Households	12,945	10,810	12,795	7,495	34,095
Small Family Households	6,175	6,540	8,165	5,410	28,745
Large Family Households	1,509	780	1,245	730	4,640
Household contains at least one person 62-74 years of age	2,055	2,080	3,045	1,765	8,910
Household contains at least one person age 75 or older	1,260	1,955	1,880	925	3,445
Households with one or more children 6 years old or younger	1,950	1,475	1,434	765	3,765

Table 7 – Total Households Table

Data 2015-2019 CHAS

Source:

*HAMFI: HUD Area Median Family Income

Housing Needs Summary Tables**1. Housing Problems (Households with one of the listed needs)**

	Renter					Owner				
	0-30% AMI	>30- 50% AMI	>50- 80% AMI	>80- 100% AMI	Total	0-30% AMI	>30- 50% AMI	>50- 80% AMI	>80- 100% AMI	Total
NUMBER OF HOUSEHOLDS										
Substandard Housing – Lacking complete plumbing or kitchen facilities	60	205	130	15	410	50	25	30	15	120
Severely Overcrowded – With >1.51 people per room (and complete kitchen and plumbing)	35	30	40	4	109	4	20	15	4	43
Overcrowded – With 1.01-1.5 people per room (and none of the above problems)	320	115	100	35	570	4	50	25	10	89
Housing cost burden greater than 50% of income (and none of the above problems)	5,220	2,655	595	4	8,474	1,495	1,205	530	95	3,325

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	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
Housing cost burden greater than 30% of income (and none of the above problems)	855	2,405	3,150	680	7,090	455	865	1,720	870	3,910
Zero/negative Income (and none of the above problems)	2,235	0	0	0	2,235	565	0	0	0	565

Table 8 – Housing Problems Table

Data 2015-2019 CHAS
Source:

2. Housing Problems 2 (Households with one or more Severe Housing Problems: Lacks kitchen or complete plumbing, severe overcrowding, severe cost burden)

	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
NUMBER OF HOUSEHOLDS										
Having 1 or more of four housing problems	6,485	5,405	4,005	735	16,630	2,020	2,165	2,320	995	7,500
Having none of four housing problems	1,135	1,465	2,955	2,680	8,235	510	1,775	3,500	3,080	8,865

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	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
Household has negative income, but none of the other housing problems	2,235	0	0	0	2,235	565	0	0	0	565

Table 9 – Housing Problems 2

Data Source: 2015-2019 CHAS

3. Cost Burden > 30%

	Renter				Owner			
	0-30% AMI	>30-50% AMI	>50-80% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	Total
NUMBER OF HOUSEHOLDS								
Small Related	2,165	1,810	1,305	5,280	375	660	815	1,850
Large Related	620	190	120	930	55	85	35	175
Elderly	980	1,000	745	2,725	965	985	825	2,775
Other	2,660	2,330	1,635	6,625	595	340	595	1,530
Total need by income	6,425	5,330	3,805	15,560	1,990	2,070	2,270	6,330

Table 10 – Cost Burden > 30%

Data Source: 2015-2019 CHAS

4. Cost Burden > 50%

	Renter				Owner			
	0-30% AMI	>30-50% AMI	>50-80% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	Total
NUMBER OF HOUSEHOLDS								
Small Related	1,930	930	110	2,970	290	345	75	710
Large Related	585	105	0	690	55	45	0	100
Elderly	790	605	150	1,545	700	605	225	1,530
Other	2,225	1,225	390	3,840	480	215	230	925
Total need by income	5,530	2,865	650	9,045	1,525	1,210	530	3,265

Table 11 – Cost Burden > 50%

Data Source: 2015-2019 CHAS

5. Crowding (More than one person per room)

	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
NUMBER OF HOUSEHOLDS										
Single family households	330	110	85	39	564	0	54	8	14	76
Multiple, unrelated family households	25	35	55	0	115	8	10	30	0	48

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Other, non-family households	0	0	0	0	0	0	0	0	0	0
Total need by income	355	145	140	39	679	8	64	38	14	124

Table 12 – Crowding Information – 1/2

Data 2015-2019 CHAS
Source:

	Renter				Owner			
	0-30% AMI	>30-50% AMI	>50-80% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	Total
Households with Children Present	0	0	0	0	0	0	0	0

Table 13 – Crowding Information – 2/2

Data 2015-2019 CHAS
Source:

Describe the number and type of single person households in need of housing assistance.

In the 2022 HUD CoC AI-501 Mobile City & County/Baldwin County CoC Point-in-Time Count from 1/24/2022, there were 347 households without children in the region and 361 total persons in households without children.

In 2021, the CoC reported 456 year-round shelter beds for households without children and 468 year-round beds for households with children; both had utilizations of 100%, indicating a possible need for more shelter beds.

Estimate the number and type of families in need of housing assistance who are disabled or victims of domestic violence, dating violence, sexual assault and stalking.

In the 2022 HUD CoC AI-501 Mobile City & County/Baldwin County CoC Point-in-Time Count from 1/24/2022, there were 65 households with at least one adult and one child. There were also 43 persons in need of housing assistance who were the victims of violence, dating violence, sexual assault and stalking.

From the City of Mobile's HOME-ARP needs assessment, 288 persons fleeing or attempting to flee domestic violence were served by the community's domestic violence shelter in 2022.

What are the most common housing problems?

The most common housing problem facing both renters and owners in Mobile is cost burden. There are 41,167 households in Mobile with income less than 100% AMI; 57% of those households are either cost burdened or severely cost burdened. There are 11,155 (27% of all households earning less than 100% AMI) households earning less than 100% AMI that pay more than 30% of their household income towards housing expenses, and there are 12,408 (30% of all households earning less than 100% AMI) households with income less than 100% AMI that pay more than 50% of their household incomes towards housing expenses.

Renters are more likely than owners to have one or more of the four severe housing problems: Lacks kitchen or complete plumbing, severe overcrowding, or severe cost burden. Sixty-one percent of renters with incomes below 100% AMI have one or more severe housing problems, compared to 44% of owners. For renters with incomes below 50% AMI, 71% have one or more severe housing problems, compared to 59% of owners with incomes below 50% AMI.

Of households with crowding (more than one person per room), 85% are renter households. Eighty-three percent of renter households with crowding are single family households and 17% are multiple, unrelated family households. Of the single-family renter households with crowding, 78% have incomes below 50% AMI. The 2015-2019 CHAS dataset does not separate crowding issues for households with children, which is why there is no information in Table 13.

Are any populations/household types more affected than others by these problems?

Elderly populations and small families are more likely to be cost burdened. Forty percent of cost-burdened households with income less than 100% AMI are elderly family and elderly non-family populations. Additionally, 29% of cost-burdened households with income less than 100% AMI are small families.

Renters are more likely to be cost burdened than owners. Of households with income less than 100% AMI, 21% of owners have a housing cost burden greater than 50% while 36% of renters have a housing cost burden greater than 50%. For households with income less than 50% AMI, 58% of renters have a housing cost burden greater than 50%. This indicates a lack of affordable housing options for those households earning less than 50% AMI.

While 17% of households in Mobile have a housing cost burden greater than 50%, that number increases in 22% for Black and African American households and 25% for Hispanic households. Similarly, 42% of Black and African American households, 42% of Hispanic households, and 27% of Asian households have a housing cost burden greater than 30%.

Describe the characteristics and needs of Low-income individuals and families with children (especially extremely low-income) who are currently housed but are at imminent risk of either residing in shelters or becoming unsheltered 91.205I/91.305(c)). Also discuss the needs

of formerly homeless families and individuals who are receiving rapid re-housing assistance and are nearing the termination of that assistance.

The greatest challenges facing low-income individuals and households with children who are at risk of either residing in shelters or becoming unsheltered aligns with the needs of formerly homeless families who are nearing the termination of rapid re-housing and other assistance.

For both of these sub-populations, the challenges include lack of safe, affordable housing within the City. As will be noted in the following Consolidated Plan sections and in the Analysis of Impediments, the City has a limited supply of affordable housing available to these populations. This need is exacerbated by lack of affordable housing that is close to job centers, schools and other community resources and the availability of public transportation options. Further, there are limited jobs available in the City for individuals with limited education experience, which comprises much of the low income population. Many of the growing sectors described in MA-45, including aviation, shipbuilding and repair, advanced manufacturing, logistics, healthcare, engineering, construction and business, require specialized skills.

For those who are at-risk for homelessness, high priority needs are rental support and protections. The numbers of these at-risk households have increased due to rising rent costs and the lack of adequate affordable housing. These households do not have access to Continuum of Care funding as they do not meet the HUD category of homelessness. As such, there is not a program in place to assist those individuals in locating and paying for new housing.

For households currently receiving assistance or looking for assistance, there is an extremely long waiting list for programs such as Housing Choice Vouchers. As such, households are not likely to find affordable housing, which increases their risk of experiencing homelessness.

If a jurisdiction provides estimates of the at-risk population(s), it should also include a description of the operational definition of the at-risk group and the methodology used to generate the estimates:

The City of Mobile does not maintain a methodology for estimating the number of at-risk individuals and households within the City.

Specify particular housing characteristics that have been linked with instability and an increased risk of homelessness

In Mobile, cost burden, specifically severe cost burden has been most linked with instability and an increased risk of homelessness. According to stakeholders, there has been an increase in individuals that are experiencing drastic rent increases during lease renewal. These rent increases may be insurmountable, resulting in a loss of housing. In addition, due to high housing demand, landlords can be more selective with credit and income requirements, which puts those individuals at a disadvantage for acquiring new housing.

Discussion

Affordable housing is the primary housing issue for the City of Mobile. Thirty percent of households in Mobile have incomes below 50% AMI and 16.6% of households have incomes below 30% AMI. The most affected households dealing with cost burden and severe cost burden are those renter households that earn less than 80% of AMI. Of the 21,395 renter households earning less than 80% AMI, 15,560 (73%) households spend at least 30% on housing costs each month. An upward trend in rental prices and housing values will continue to strain the budget of many residents, increasing the risk of losing homes or being forced out of unaffordable rental units. To best serve this group with rising rents, it will be important to pair rental assistance with wrap-around services to provide stability and help households maintain affordable housing.

However, this situation is especially challenging for individuals and families experiencing homelessness; increased housing costs with minimal opportunities for wage growth present barriers to entering a stable housing situation. The most critical aspect of alleviating this issue of cost burden will be investing in affordable housing units; both in the generation of new units as well as in the protection of existing ones.

NA-15 Disproportionately Greater Need: Housing Problems – 91.205 (b)(2)

Assess the need of any racial or ethnic group that has disproportionately greater need in comparison to the needs of that category of need as a whole.

Introduction

This section assesses the need of any racial or ethnic group that has disproportionately greater need in comparison to the needs of that category of need as a whole. The data and discussion below examine housing problems by AMI and race/ethnicity.

There are four types of housing problems as defined by HUD:

1. Housing unit lacks complete kitchen facilities: A complete kitchen consists of a sink with a faucet, a stove or range, and a refrigerator
2. Housing unit lacks complete plumbing facilities: Complete plumbing consists of hot and cold running water, a flush toilet, and a bathtub or shower
3. Household is overcrowded: More than one person per room
4. Household is cost-burdened: Monthly housing costs (including utilities) exceeding 30% of monthly income.

Of those households with AMI below 30%, 66% have one or more of the four housing problems, which is slightly less than the 2018 Consolidated Plan (72%). The proportion of Black or African American households with AMI below 30% that have one or more of the four housing problems (66%) has decreased from 2018 (75%). Similarly, the proportion of Asian households with AMI below 30% that have one or more of the four housing problems (27%) has decreased from 2018 (64%), and the proportion of Hispanic households with AMI below 30% that have one or more of the four housing problems (55%) has decreased from 2018 (73%).

0%-30% of Area Median Income

Housing Problems	Has one or more of four housing problems	Has none of the 4 housing problems OR cost burden not computed	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	8,505	4,445	N/A ¹
White	2,440	1,200	N/A
Black / African American	5,685	2,915	N/A
Asian	55	150	N/A
American Indian, Alaska Native	10	4	N/A
Pacific Islander	0	4	N/A

¹ Data not available for the “Household has no/negative income, but none of the other housing problems” category.

Housing Problems	Has one or more of four housing problems	Has none of the 4 housing problems OR cost burden not computed	Household has no/negative income, but none of the other housing problems
Hispanic	130	105	N/A

Table 14 - Disproportionally Greater Need-0 - 30% AMI

Data 2015-2019 CHAS
Source:

*The four housing problems are:

1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than one person per room, 4. Cost Burden greater than 30%

30%-50% of Area Median Income

Housing Problems	Has one or more of four housing problems	Has none of the 4 housing problems OR cost burden not computed	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	7,570	3,240	N/A
White	2,325	985	N/A
Black / African American	4,825	2,200	N/A
Asian	125	0	N/A
American Indian, Alaska Native	0	10	N/A
Pacific Islander	0	0	N/A
Hispanic	230	20	N/A

Table 15 - Disproportionally Greater Need -30 - 50% AMI

Data 2015-2019 CHAS
Source:

*The four housing problems are:

1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than one person per room, 4. Cost Burden greater than 30%

50%-80% of Area Median Income

Housing Problems	Has one or more of four housing problems	Has none of the 4 housing problems OR cost burden not computed	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	6,330	6,465	N/A
White	2,280	2,425	N/A

Housing Problems	Has one or more of four housing problems	Has none of the 4 housing problems OR cost burden not computed	Household has no/negative income, but none of the other housing problems
Black / African American	3,630	3,690	N/A
Asian	65	19	N/A
American Indian, Alaska Native	10	15	N/A
Pacific Islander	0	0	N/A
Hispanic	230	175	N/A

Table 16 - Disproportionally Greater Need –50 - 80% AMI

Data 2015-2019 CHAS
Source:

*The four housing problems are:

1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than one person per room, 4. Cost Burden greater than 30%

80%-100% of Area Median Income

Housing Problems	Has one or more of four housing problems	Has none of the 4 housing problems OR cost burden not computed	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	1,735	5,760	N/A
White	735	2,490	N/A
Black / African American	920	2,900	N/A
Asian	19	90	N/A
American Indian, Alaska Native	0	10	N/A
Pacific Islander	0	0	N/A
Hispanic	45	145	N/A

Table 17 - Disproportionally Greater Need –80 – 100% AMI

Data 2015-2019 CHAS
Source:

*The four housing problems are:

1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than one person per room, 4. Cost Burden greater than 30%

Discussion

Of those households with AMI below 30%, 66% have one or more of the four housing problems. Roughly 67% of White households and 66% of Black or African American households with AMI below 30% have one or more of the four housing problems; however, there are a greater number of African American

households with AMI below 30% having one or more of the housing problems (5,685) than White households (2,440).

Of those households with AMI between 30% and 50%, 70% of households have one or more of the four housing problems. Sixty-nine percent of Black or African American households (4,825) and 92% of Hispanic households (230) in this AMI range have one or more housing problems.

Of those households with AMI between 50% and 80%, 49% have one or more of the four housing problems, and in households with AMI between 80% and 100%, 23% have one or more of the four housing problems.

NA-20 Disproportionately Greater Need: Severe Housing Problems – 91.205 (b)(2)

Assess the need of any racial or ethnic group that has disproportionately greater need in comparison to the needs of that category of need as a whole.

Introduction

This section assesses the need of any racial or ethnic group that has disproportionately greater need in comparison to the needs of that category of need as a whole. The data and discussion below examine severe housing problems by AMI and race/ethnicity.

There are four types of severe housing problems as defined by HUD:

1. Housing unit lacks complete kitchen facilities: A complete kitchen consists of a sink with a faucet, a stove or range, and a refrigerator
2. Housing unit lacks complete plumbing facilities: Complete plumbing consists of hot and cold running water, a flush toilet, and a bathtub or shower
3. Household is severely overcrowded: More than 1.5 persons per room
4. Household is severely cost-burdened: Monthly housing costs (including utilities) exceeding 50% of monthly income

Among households with AMI below 30%, the proportion of households with one or more severe housing problems has decreased since the 2018 Consolidated Plan. In Mobile, 56% of households with AMI below 30% have one or more severe housing problems, which is a decrease from 64% in the previous plan. Among Black or African American households with AMI below 30%, 55% have one or more severe housing problems. Among Hispanic households with AMI below 30%, 51% have one or more severe housing problems.

0%-30% of Area Median Income

Severe Housing Problems*	Has one or more of four severe housing problems	Has none of the 4 severe housing problems OR cost burden not computed	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	7,195	5,750	N/A ²
White	2,110	1,530	N/A
Black / African American	4,750	3,845	N/A
Asian	50	160	N/A
American Indian, Alaska Native	0	14	N/A

² Data not available for the “Household has no/negative income, but none of the other housing problems” category.

Severe Housing Problems*	Has one or more of four severe housing problems	Has none of the 4 severe housing problems OR cost burden not computed	Household has no/negative income, but none of the other housing problems
Pacific Islander	0	4	N/A
Hispanic	120	115	N/A

Table 18 – Severe Housing Problems–0 - 30% AMI

Data 2015-2019 CHAS
Source:

*The four severe housing problems are:

1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than 1.5 persons per room, 4. Cost burden over 50%

30%-50% of Area Median Income

Severe Housing Problems*	Has one or more of four severe housing problems	Has none of the 4 severe housing problems OR cost burden not computed	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	4,305	6,505	N/A
White	1,405	1,905	N/A
Black / African American	2,525	4,500	N/A
Asian	100	25	N/A
American Indian, Alaska Native	0	10	N/A
Pacific Islander	0	0	N/A
Hispanic	230	20	N/A

Table 19 – Severe Housing Problems –30 - 50% AMI

Data 2015-2019 CHAS
Source:

*The four severe housing problems are:

1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than 1.5 persons per room, 4. Cost burden over 50%

50%-80% of Area Median Income

Severe Housing Problems*	Has one or more of four severe housing problems	Has none of the 4 severe housing problems OR cost burden not computed	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	1,460	11,325	N/A

Severe Housing Problems*	Has one or more of four severe housing problems	Has none of the 4 severe housing problems OR cost burden not computed	Household has no/negative income, but none of the other housing problems
White	540	4,170	N/A
Black / African American	780	6,540	N/A
Asian	40	49	N/A
American Indian, Alaska Native	10	15	N/A
Pacific Islander	0	0	N/A
Hispanic	65	345	N/A

Table 20 – Severe Housing Problems –50 - 80% AMI

Data 2015-2019 CHAS
Source:

*The four severe housing problems are:

1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than 1.5 persons per room, 4. Cost burden over 50%

80%-100% of Area Median Income

Severe Housing Problems*	Has one or more of four severe housing problems	Has none of the 4 severe housing problems OR cost burden not computed	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	180	7,315	N/A
White	105	3,115	N/A
Black / African American	75	3,750	N/A
Asian	0	110	N/A
American Indian, Alaska Native	0	10	N/A
Pacific Islander	0	0	N/A
Hispanic	0	190	N/A

Table 21 – Severe Housing Problems –80 - 100% AMI

Data 2015-2019 CHAS
Source:

*The four severe housing problems are:

1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than 1.5 persons per room, 4. Cost burden over 50%

Discussion

Of those households with AMI below 30%, 56% have one or more of the four severe housing problems. Roughly 58% of White households and 55% of Black or African American households with AMI below

30% have one or more of the four severe housing problems; however, there are a greater number of African American households with AMI below 30% having one or more of the severe housing problems (4,750) than White households (2,110).

Of those households with AMI between 30% and 50%, 40% of households have one or more of the four severe housing problems. Approximately 36% of Black or African American households (2,525) and 92% of Hispanic households (230) in this AMI range have one or more severe housing problems.

Of those households with AMI between 50% and 80%, 11% have one or more of the four severe housing problems, and in households with AMI between 80% and 100%, 2% have one or more of the four severe housing problems.

NA-25 Disproportionately Greater Need: Housing Cost Burdens – 91.205 (b)(2)

Assess the need of any racial or ethnic group that has disproportionately greater need in comparison to the needs of that category of needs as a whole.

Introduction:

This section looks at housing cost burden to assess the need of any racial or ethnic group that has disproportionately greater need in comparison to the needs of that category as a whole. A household that is cost burdened has monthly housing costs (including utilities) that exceed 30% of their monthly income, while a household that is severely cost burdened has monthly housing costs (including utilities) that exceed 50% of their monthly income.

Households that are cost burdened spend a disproportionate amount of their income on housing, which limits their ability to spend income on other necessities, like food, clothing, transportation, and medical care, as well as nonessential expenses. Cost burdened households may also have difficulty finding alternative housing that is affordable, or may make tradeoffs to reduce housing costs, such as living in a poor-quality home or farther away from work opportunities.³

Housing Cost Burden

Housing Cost Burden	<=30%	30-50%	>50%	No / negative income (not computed)
Jurisdiction as a whole	49,145	12,470	12,415	2,830
White	26,350	4,580	4,070	735
Black / African American	20,800	7,465	7,750	1,860
Asian	870	140	185	130
American Indian, Alaska Native	160	10	10	0
Pacific Islander	15	0	0	0
Hispanic	950	275	400	105

Table 22 – Greater Need: Housing Cost Burdens AMI

Data Source: 2015-2019 CHAS

Discussion:

In Mobile, 32% of households have monthly housing costs that exceed 30% of their monthly income, and 16% of households have monthly housing costs that exceed 50% of their monthly income. Among Black or African American households, 40% of households have monthly housing costs that exceed 30%

³ HUD. Rental Burdens: Rethinking Affordability Measures. Available at: https://www.huduser.gov/portal/pdredge/pdr_edge_featd_article_092214.html.

of their monthly income, and 20% of households have monthly housing costs that exceed 50% of their monthly income. Of White households, 24% have monthly housing costs that exceed 30% of their monthly income and 11% of White households have monthly housing costs that exceed 50% of their monthly income. Among Hispanic households, 39% of households have monthly housing costs that exceed 30% of their monthly income, and 23% of households have monthly housing costs that exceed 50% of their monthly income.

NA-30 Disproportionately Greater Need: Discussion – 91.205(b)(2)

Are there any income categories in which a racial or ethnic group has disproportionately greater need than the needs of that income category as a whole?

Of households in the 30%-50% AMI category, 70% of households have one or more of the four housing problems. This proportion is greater for Asian (100%) and Hispanic (92%) households. However, the count of both Asian (125) and Hispanic (250) households in this income category is relatively small. In the 50%-80% AMI category, 49% of households have one or more of the four housing problems. This proportion is greater for Black or African American (50%), Asian (77%), and Hispanic (57%) households.

Among households in the 30-50% AMI category, 40% of households have one or more of the four severe housing problems. This proportion is greater for White (42%), Asian (80%), and Hispanic (92%) households. In the 50%-80% AMI category, 11% of households have one or more of the four severe housing problems. This proportion is greater for Asian (45%), American Indian or Alaska Native (40%), and Hispanic (16%) households. These racial or ethnic groups are a relatively small portion of the income category, with 89 Asian households, 25 American Indian or Alaska Native households, and 410 Hispanic households.

Thirty-two percent of households in Mobile have monthly housing costs that exceed 30% of their monthly income. This proportion is greater for Black or African American households (40%) and Hispanic households (39%).

If they have needs not identified above, what are those needs?

The most common housing challenges for racial and ethnic groups described above include cost burden, housing problems, and severe housing problems. Housing problems include a lack of complete kitchen facilities, a lack of complete plumbing facilities, overcrowding, and cost burden. Severe housing problems also include severe overcrowding and severe cost burden.

Are any of those racial or ethnic groups located in specific areas or neighborhoods in your community?

Neighborhoods with a majority Black or African American population are generally in the eastern and northern portions of the city, and include Gorgas, Carver, North Crichton, Autumndale, Beau Terra, Pinewood, Brookley, Bayview, Lourdes, and Riverside neighborhoods. Although Asian populations represent a smaller portion of neighborhood populations, there are areas of larger Asian populations in Airmont, Bolton, and the University of South Alabama neighborhoods. Similarly, there are areas of larger Hispanic populations in Gorgas, University of South Alabama, and Greenwich Hills neighborhoods.

Neighborhoods with R/ECAP Census tracts include Hillsdale, North Crichton, South Crichton, Maryvale, Maysville, Baltimore, Arlington, Oakdale, Plateau, Happy Hills, Owens, Fisher, and Gorgas.

NA-35 Public Housing – 91.205(b)

Introduction

The Mobile Housing Authority (MHA), the housing authority for the City of Mobile, operates 1,363 public housing units and assists 3,544 households through the Housing Choice Voucher program. The majority (96%) of residents residing in public housing and using vouchers are Black/African American. The average annual income of residents served by the MHA is \$13,936 for public housing and \$14,242 for Housing Choice Vouchers. Both figures are 22% less than the FY 2022 extremely low-income limit of \$18,310 established by HUD for Mobile County for a two person household; for a household of four these incomes are 49% less than the FY 2022 income of \$27,750.

Data provided in the narrative is based on the MHA 2023 Annual Action Plan, prepared in June 2022⁴ and additional data provided by MHA which has been included in the Appendix, whereas the data in the tables is from the Office of Public and Indian Housing (PIH) based on prior reporting collected.

Totals in Use

	Program Type								
	Certificate	Mod-Rehab	Public Housing	Vouchers			Special Purpose Voucher		
				Total	Project - based	Tenant - based	Veterans Affairs Supportive Housing	Family Unification Program	Disabled *
# of units vouchers in use	0	0	2,161	3,396	0	3,322	20	14	23

Table 23 - Public Housing by Program Type

*includes Non-Elderly Disabled, Mainstream One-Year, Mainstream Five-year, and Nursing Home Transition

Data Source: PIC (PIH Information Center)

⁴ Mobile Housing Authority 2023 Annual Action Plan https://www.mobilehousing.org/files/2022-08-22-2023_Annual_Plan-Public_Review.pdf

Characteristics of Residents

	Program Type							
	Certificate	Mod-Rehab	Public Housing	Vouchers			Special Purpose Voucher	
				Total	Project - based	Tenant - based	Veterans Affairs Supportive Housing	Family Unification Program
Average Annual Income	0	0	9,125	9,553	0	9,517	6,790	9,080
Average length of stay	0	0	8	5	0	5	0	8
Average Household size	0	0	2	2	0	2	1	4
# Homeless at admission	0	0	0	174	0	170	2	1
# of Elderly Program Participants (>62)	0	0	697	247	0	244	0	0
# of Disabled Families	0	0	311	694	0	658	8	4
# of Families requesting accessibility features	0	0	2,161	3,396	0	3,322	20	14
# of HIV/AIDS program participants	0	0	0	0	0	0	0	0
# of DV victims	0	0	0	0	0	0	0	0

Table 24 – Characteristics of Public Housing Residents by Program Type

Data Source: PIC (PIH Information Center)

Race of Residents

Race	Certificate	Mod-Rehab	Public Housing	Program Type					
				Vouchers			Special Purpose Voucher		
				Total	Project - based	Tenant - based	Veterans Affairs Supportive Housing	Family Unification Program	Disabled *
White	0	0	94	201	0	192	4	0	3
Black/African American	0	0	2,060	3,191	0	3,126	16	14	20
Asian	0	0	2	4	0	4	0	0	0
American Indian/Alaska Native	0	0	4	0	0	0	0	0	0
Pacific Islander	0	0	1	0	0	0	0	0	0
Other	0	0	0	0	0	0	0	0	0
*includes Non-Elderly Disabled, Mainstream One-Year, Mainstream Five-year, and Nursing Home Transition									

Table 25 – Race of Public Housing Residents by Program Type

Data Source: PIC (PIH Information Center)

Ethnicity of Residents

Ethnicity	Certificate	Mod-Rehab	Public Housing	Program Type					
				Vouchers			Special Purpose Voucher		
				Total	Project - based	Tenant - based	Veterans Affairs Supportive Housing	Family Unification Program	Disabled *
Hispanic	0	0	7	3	0	3	0	0	0
Not Hispanic	0	0	2,154	3,393	0	3,319	20	14	23
*includes Non-Elderly Disabled, Mainstream One-Year, Mainstream Five-year, and Nursing Home Transition									

Table 26 – Ethnicity of Public Housing Residents by Program Type

Data Source: PIC (PIH Information Center)

Section 504 Needs Assessment: Describe the needs of public housing tenants and applicants on the waiting list for accessible units:

The Mobile Housing Authority provides 4,500 Housing Choice vouchers, along with 91 project-based vouchers and special program vouchers (including Veterans Affairs Supportive Housing, Family Unification, Emergency Housing Vouchers). The waitlist for vouchers is opened twice per year and limited to 1,200 applicants in each round.

The combined waiting lists for Mobile Housing Authority (MHA), as of January 18, 2023, total 3,426 households. Of those households, 70.5 percent are families with children (2,417), almost 14% (477) are families with disabilities, and 12.9% (443) are elderly families. Family households are predominately requesting 2-bedroom units (43.9%) and 3-bedroom units (32%). In total, 920 households on the waiting list identify with groups that may need accommodations, including elderly and disabled applicants, and others requiring accessible units.

The average household size of current MHA tenants is 2 people (Table 24). Program participants are also older. Thirty-nine percent of resident households and 16% of voucher households are elderly. MHA's largest housing development, Central Plaza Towers, provides 465 units exclusively for seniors. Additionally, over one-quarter of resident households (362) and voucher households (934) are disabled. Of those groups, 47 current tenant households and 116 voucher households are in need of accessible units (see MHA provided data in Appendix).

Most immediate needs of residents of Public Housing and Housing Choice voucher holders

MHA and City of Mobile's most immediate need is to increase the affordable housing supply, particularly in areas of low-poverty and low-minority-concentrated census tracts, and promote landlord engagement on voucher use.

Residents of public housing and Housing Choice Voucher (HCV) holders, are in need of affordable housing units. Of the families on the waiting list, 25% are extremely low income (defined as equal to or less than 30% of Area Median Income) and experience severe housing cost burden at Fair Market Rent rates. The average income of MHA residents and HCV holders is around \$14,000 for a household of two, which is 22% less than 30% Area Median Income (AMI) (\$18,310 for FY 2022). This also indicates these households would experience a severe cost burden at Fair Market Rent (FMR) or High or Low HOME rental rates.

MHA has also reduced its stock of public housing units by 50% with the planned demolition of James Place and R.V. Taylor Plaza to be completed in 2026. The 285 remaining units in these buildings are being vacated and households are being provided with HCVs because all other MHA-managed public housing units are occupied. These households will likely need support to find affordable and decent replacement housing.

How do these needs compare to the housing needs of the population at large?

As described in NA-10, the most common housing problem facing both renters and owners in Mobile is cost burden. Forty percent of cost-burdened households with income less than 100% AMI are elderly family and elderly non-family populations. Additionally, 29% of cost-burdened households with income less than 100% AMI are small families. Additionally, the lack of availability of affordable and decent housing for a wide range of Mobile communities and across all income levels was frequently cited as a need by stakeholders during consultations in the development of this plan. For public housing residents needing to relocate and HCV holders, the limited affordable housing stock for households at or below 30% AMI in the city puts residents at risk of becoming severely cost burdened or unable to find decent and safe rental housing.

Discussion

Since the 2017-2022 Consolidated Plan, MHA has reduced its public housing stock by 50% (from 2,665 units to 1,363 units) through RAD conversion and demolition, while still maintaining a growing waitlist for units and Housing Choice Vouchers. The average income levels of residents and HCV households fall into the extremely low-income bracket and are at risk for severe cost burden even at subsidized rents.

As MHA focuses more on providing vouchers over managing public housing units, MHA will need to engage landlords and encourage greater acceptance of HCVs as part of rental payment. However, MHA and housing advocates have noted that landlords are declining to accept HCVs as a portion of the rent in part due to overall rental demand, and partly due to disinterest of participating publicly funded rental programs. Additionally, since Alabama does not protect source of income from fair housing discrimination, landlords are within rights to decline a renter with HCVs. MHA and the City, along with housing advocates, will need to find ways to work with landlords across the city to open up options for HCV participants.

Development of new units will be necessary as well to address the loss of public housing units being demolished. With increasing market rents, and few protections for renters in Alabama, households with vouchers will need more affordable housing options throughout the city. MHA may look at layering funding sources to incentivize affordable unit development for the lowest income households and households with accessibility needs.

NA-40 Homeless Needs Assessment – 91.205(c)

Introduction:

Mobile is part of a three jurisdiction Coordinated Entry system that includes City of Mobile, Mobile County, and Baldwin County. Housing First, Inc. and AltaPoint operate in all three jurisdictions, while all other participating service providers operate within their own geography. The coordinated entry system takes 2-3 weeks to place individuals and households in rapid rehousing if units are available. However, identifying available units can take longer.

Mobile's plan to end homelessness is led by Housing First, Inc., a non-profit agency leading the Continuum of Care and delivering case management services as well as providing housing. The table below describes the nature and extent of homeless in Mobile. The source of following data for the Homeless Needs Assessment is the 2022 Point-In-Time Count. This chart shows that on any given night, there are 469 sheltered individuals experiencing homelessness and 289 unsheltered individuals experiencing homelessness. Each year, an estimated 987 households become homeless, with only 421 households exiting homelessness.

Homeless Needs Assessment

Population	Estimate the # of persons experiencing homelessness on a given night		Estimate the # experiencing homelessness each year	Estimate the # becoming homeless each year	Estimate the # exiting homelessness each year	Estimate the # of days persons experience homelessness
	Sheltered	Unsheltered				
Persons in Households with Adult(s) and Child(ren)	215	9	730	127 (households)	67 (households)	108
Persons in Households with Only Children	0	0	0	0	0	0
Persons in Households with Only Adults	173	188	1475	860 (households)	282 (households)	55
Chronically Homeless Individuals	10	66	163 (heads of household & adults)			

Population	Estimate the # of persons experiencing homelessness on a given night		Estimate the # experiencing homelessness each year	Estimate the # becoming homeless each year	Estimate the # exiting homelessness each year	Estimate the # of days persons experience homelessness
	Sheltered	Unsheltered				
Chronically Homeless Families	1	0	6 (households)			
Veterans	59	16	278		44 (AO Veteran Households)	129 (AO Veteran Households)
Unaccompanied Child	8	8			6 (Parenting Youth Households)/22 (AO Unaccompanied Youth Households)	78 (Parenting Youth Households)/33 (AO Unaccompanied Youth Households)
Persons with HIV	3	2	18			

Table 27 - Homeless Needs Assessment

Data Source

Comments: 2022 Point-In-Time Count

If data is not available for the categories "number of persons becoming and exiting homelessness each year," and "number of days that persons experience homelessness," describe these categories for each homeless population type (including chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth):

The data for the Nature and Extent of Homelessness Chart is from the 2022 Housing Inventory County. This chart indicates a higher proportion of Black or African American individuals experiencing both sheltered and unsheltered homelessness than white individuals.

Nature and Extent of Homelessness: (Optional)

Race:	Sheltered:	Unsheltered (optional)
White	125	88
Black or African American	244	102
Asian	1	0
American Indian or Alaska Native	2	1
Pacific Islander	2	0
Ethnicity:	Sheltered:	Unsheltered (optional)
Hispanic	18	3
Not Hispanic	370	194

Estimate the number and type of families in need of housing assistance for families with children and the families of veterans.

Based on the 2022 Point-in-time count, it is estimated 278 Veterans and 730 individuals who are part of families with children were experiencing homelessness that year. For families, most counted in the PIT were sheltered and include at least one adult. However, the count represents about 30% of all families estimated to be homeless within the year. For veterans, the shelter rate is approximately 21%.

Describe the Nature and Extent of Homelessness by Racial and Ethnic Group.

Between 10/1/2018 and 9/30/2019, the Mobile Coordinated Entry system provided services to 3,004 adults and children with direct services.⁵

Describe the Nature and Extent of Unsheltered and Sheltered Homelessness.

The majority of families throughout the CoC experiencing homelessness on any given night are sheltered. While veteran homelessness is low overall, veterans are unsheltered at a very high rate with about one-third of homeless veterans on any given night being unsheltered. This high unsheltered rate

⁵ Housing First, Inc. Housing First, Inc. 2019 Annual Report. Accessible at: <https://hfal.org/wp-content/uploads/2020/04/HFI-2019-Annual-Report.pdf>.

also affects persons with HIV and chronically homeless individuals. When looking at the two categories in their respective whole, each have unsheltered rates of approximately 30%.

The Mobile County School Board estimates that approximately 4,000 students in the County are homeless as defined by the Department of Education, which includes youth who “lack a fixed, regular, and nighttime residence.” This is approximately 7% of the students attending school in Mobile County. These numbers are not necessarily captured in the homelessness data available. It is also important to note that doubling up and sleeping on couches is not captured in homelessness data, but rather within the overcrowding numbers.

Discussion:

The primary drivers of homelessness in Mobile are stagnation/decreasing wages combined with a lack of affordable housing options. Without a high functioning transit system these two problems are exacerbated, resulting in higher pressure on organizations and facilities providing services for homeless and chronically homeless individuals and families.

NA-45 Non-Homeless Special Needs Assessment - 91.205 (b,d)

Introduction:

The Non-Homeless Special Needs Assessment is focused on describing the special needs population in Mobile. This analysis is focused on persons with disabilities, the elderly and residents with HIV/AIDS.

Describe the characteristics of special needs populations in your community:

Persons with disabilities

Access to high-quality affordable housing is a need throughout Mobile and, in particular for those with disabilities. Approximately 12.5% of the non-institutionalized civilian population has a disability and nearly 32.8% of those over the age of 65 have a disability according to the 2017- 2021 American Community Survey 5-Year Estimates. For those residents, there are options for in-home or community-based supportive services throughout Mobile. However, many persons with disabilities are very low income and cannot afford even a modest fee. This group relies on Medicaid Vouchers, which consistently has a waiting list over 3,000, to cover the cost of care.

The Elderly

The elderly population in Mobile have similar needs to persons with disabilities or are disabled. Approximately 16.5% of the noninstitutionalized population is 65 years of age or older and 32.8% of those over the age of 65 have a disability according to the 2017 – 2021 American Community Survey 5-Year Estimates. For those residents, access to quality, accessible, and affordable housing in areas of opportunity, that are close to services and transportation are limited. Specifically, low-income families and individuals who own their homes and need assistance with repairs and/or modifications to support aging in place have a difficult time accessing resources.

This need is compounded by the age of Mobile's housing stock, approximately 43.3% of which was built before 1970. The age of housing and limited resources for homeowners and landlords to modify homes has created a need in the community for accessible housing.

What are the housing and supportive service needs of these populations and how are these needs determined?

Beyond the need for quality affordable housing and access to transportation, persons with disabilities and the elderly are in need of accessible housing, access to affordable healthcare and other social services. Throughout the development of the Analysis of Impediments and the Consolidated Plan, stakeholders identified the need for greater access to Federal programs such as Medicaid to assist residents with disabilities. These programs provide low-income persons with disabilities and their families with affordable options for housing, health care and other activities such as job programs. Stakeholders discussed the inability of clients to afford rent due to under-employment and a lack of

affordable units. For those with disabilities, there is a further lack of units that meet accommodation needs.

Stakeholders also identified similar needs for those with HIV/AIDS. Many of these individuals and their families are in need of affordable housing and access to affordable medical care and social services, as well as access to reliable transportation.

Discuss the size and characteristics of the population with HIV/AIDS and their families within the Eligible Metropolitan Statistical Area:

The City of Mobile is not a HOPWA Grantee, however there is a need for services for those with HIV and AIDS. According to the Alabama Department of Health, there were approximately 2,262 people living with HIV in Mobile in 2020. This is approximately 0.5% of the population in comparison to 0.3% throughout the state of Alabama. HIV and AIDS has had the greatest impact on the African American community throughout the state and in the region. Approximately 67% of persons living with HIV/AIDS in Mobile County are African American.

Discussion:

The City of Mobile has made strides to improve government infrastructure and support services that provide support to the elderly and persons with disabilities. However, there is still a great need for affordable housing and transportation for these residents and those with HIV/AIDS. Federal resources available for residents with special needs have fluctuated over the past five years as the focus of new allocations has been on rental assistance and housing development.

NA-50 Non-Housing Community Development Needs – 91.215 (f)

Describe the jurisdiction's need for Public Facilities:

The Community Housing and Development Department is opening and managing a neighborhood resource center within downtown Mobile to provide a central location for local nonprofits to conduct activities and coordinate services, including meeting and training space and a computer lab. Several office spaces will be made available for lease and Legal Aid of South Alabama will utilize a space within the center. Additionally, Community Housing and Development plans to set up food pantries in Districts 1, 2 and 3 in the neighborhood community centers, and has provided support for a mobile command center to be housed at Fire Station 12 Crichton.

How were these needs determined?

Since the prior Consolidated Plan, the City identified a need for a centralized space for nonprofits to engage with the community and build collaborations across service providers as many had moved to virtual spaces during the pandemic. Stakeholders stated efforts to connect with residents and build partnerships across service providers and the City are still needed. In particular, similar spaces to the resource center within neighborhoods would build greater community by allowing residents to engage with the City and service providers where they live. The City will continue to look for opportunities for creating collaborative spaces and building community engagement.

Describe the jurisdiction's need for Public Improvements:

In the community needs survey, respondents indicated that they wanted increased access to parks, recreation, youth services, and other community amenities. Additionally, survey respondents wanted the government to build more walk and bike infrastructure, especially sidewalks. Respondents also spoke to the need for increased trash pickup and neighborhood beautification.

The City of Mobile is maintaining a five-year Capital Improvement Program⁶ to address infrastructure repair/upgrade needs throughout Mobile with projects addressing transportation, parks and greenways, public facilities, and environmental improvements. To support these efforts, the City has identified funding from a variety of sources, including local sales tax, city annual funds, public and private grants, and state agency collaboration.

The Community Housing and Development Department intends to build on these investments and fund housing and community development programs that leverage capital improvement spending to increase access to affordable housing and economic development opportunities, and address blight.

How were these needs determined?

The City of Mobile leads an ongoing evaluation effort to determine immediate, short-term and long-term capital investment needs to address maintenance and improvements for safe, reliable, and

⁶ City of Mobile, *Capital Improvement Program 2023-2027* January 2023 https://mapformobile.org/wp/wp-content/uploads/2023/02/CIP-23-27_Final_forPrint_Optimized.pdf

efficient infrastructure. The CIP is developed with inputs from multiple city departments, City Council, and community leaders.

Describe the jurisdiction's need for Public Services:

In stakeholder interviews, many felt Mobile needs additional services for homeless persons and families, particularly those newly homeless. The current shelters are operating at capacity with waitlists. Stakeholders also mentioned needs for wrap-around services, mental health supports, job training, and services for youth integrated into the schools.

In the community survey, when asked to rank the level of need for public services, survey respondents ranked health/behavioral health services and homeless services as the highest need, followed by fair housing (equal access for all).

How were these needs determined?

As a part of the Analysis of Impediments to Fair Housing and Consolidated Plan process, a Community Needs Assessment survey was created and distributed to stakeholders and community members. Stakeholder interviews were also conducted, and focused on identifying Mobile's community development assets, challenges, and needs, current impediments to fair housing and potential actions to address impediments.

Housing Market Analysis

MA-05 Overview

Housing Market Analysis Overview:

Mobile has 39,551 owner-occupied units and 37,964 renter-occupied units. Of those, the majority are single-family detached units. The second most common housing type is 5-19 unit structures. Together, these two housing types make up 83.9 percent of Mobile's housing supply.

The majority of Mobile's housing stock is 2-3 bedroom, at 67.3% of units for owners and 70.2% of units for renters. There is a large discrepancy of studio and one-bedroom units between owner- and renter-occupied housing; studios and one-bedrooms make up 1.1 percent of owner-occupied units and 23.7 percent of renter-occupied units. At the same time, the average household size has decreased from 2.42 to 2.35 from the 2017 and 2021 5-Year ACS. The increase in smaller households may benefit from the discrepancy of smaller units between owners and renters. Subsequently, the family households in Mobile have decreased from 44,059 households in 2017 to 42,610 households in 2021. This could reflect greater demographic changes or could indicate that families or larger non-family households cannot find adequate housing in Mobile and may leave the city. This could be supported by evidence that households that rent experience overcrowding and severe overcrowding at much higher rates than households that own (see table 7 in NA-10).

MA-10 Number of Housing Units – 91.210(a)&(b)(2)

Introduction

The majority of Mobile’s housing stock is single-family detached housing followed by 5-19 unit large apartments. Since the 2018 Consolidated Plan, Mobile has lost about 2,000 units in 2-4 unit structures while gaining about 3,000 units in 5-19 unit structures and about 1,000 units in 20 or more unit structures. At the same time, 1-unit, detached structures have remained fairly stagnant. This indicates that older “missing middle” housing is likely being demolished while large apartments are being built. Missing Middle is a term used to describe the range of housing density between “single-family detached home and mid-rise apartment building” that was prevalent in the early twentieth century but has been made difficult to construct and maintain in most American cities⁷.

The majority of Mobile’s housing stock is 2-3 bedroom, at 67.3% of units for owners and 70.2% of units for renters. There are also significantly more 1-bedroom units for renters, and significantly more 4 or more-bedroom units for homeowners.

All residential properties by number of units

Property Type	Number	%
1-unit detached structure	61,934	68.0%
1-unit, attached structure	1,241	1.4%
2-4 units	5,030	5.5%
5-19 units	14,512	15.9%
20 or more units	7,198	7.9%
Mobile Home, boat, RV, van, etc	1,162	1.3%
Total	91,077	

Table 28 – Residential Properties by Unit Number

Data Source: 2017-2021 ACS

Unit Size by Tenure

	Owners		Renters	
	Number	%	Number	%
No bedroom	46	0.1%	1,219	3.2%
1 bedroom	382	1.0%	7,790	20.5%
2 or 3 bedrooms	26,600	67.3%	26,647	70.2%
4 or more bedrooms	12,523	31.7%	2,308	6.1%
Total	39,551		37,964	

Table 29 – Unit Size by Tenure

Data Source: 2017-2021 ACS

⁷Planetizen. “What is Missing Middle Housing?”. Available at: <https://www.planetizen.com/definition/missing-middle-housing>

Describe the number and targeting (income level/type of family served) of units assisted with federal, state, and local programs.

There are 3,096 low income LIHTC units in Mobile according to HUD's LIHTC Database. These units serve households with less than 60% area median gross income⁸.

Provide an assessment of units expected to be lost from the affordable housing inventory for any reason, such as expiration of Section 8 contracts.

The Mobile Housing Authority has submitted plans to move forward with demolishing Thomas James Place, R.V. Taylor Plaza, and Boykin Tower developments by 2026 due to the poor conditions of the properties. This reduces the stock of public housing units by 50 percent, or over 1,300 units, from previous years. MHA is working to increase project-based voucher housing developments.

Does the availability of housing units meet the needs of the population?

There has been a slightly declining population and slight increase in housing production, especially in large apartment complexes. Since the last Consolidated Plan, the population has declined from 192,085 to 187,445 while the number of housing units has increased by about 1,000 units. The decreasing average household size means that fewer people are living in more housing units which may necessitate the increase in units. There are currently 77,515 households and 91,077 housing units. At the same time, the availability of housing units does not necessarily indicate whether housing is safe and affordable. Many stakeholders mentioned disrepair, mold, and other weatherization issues of aging housing stock. Section MA-20 further elaborates on lead and other housing quality issues. Additionally, 42% of renter households are cost burdened in Mobile.

Describe the need for specific types of housing:

There is a need for more multifamily units affordable to renter households with income less than 50% AMI. Many of the most severely cost-burdened households are small, related households (22%), elderly (47%), and other non-elderly, non-family (28%) indicating a need for more affordable housing for small families, elderly populations, and other affordable housing. Only 6.1 percent of rentals are four or more bedrooms indicating that larger families and households that rent may also have a difficult time finding housing.

⁸ HUD Low Income Housing Tax Credit Properties ArcGIS Open Data. Available at: <https://hudgis-hud.opendata.arcgis.com/datasets/HUD::low-income-housing-tax-credit-properties/about>

Discussion

The primary indicator of available units not meeting population needs is the combination of cost burden identified on renter households and the large difference in unit size by tenure between owners and renters. In the last Consolidated Plan, 67% of all renter households were experiencing cost burden in housing, but more recent data shows that 42% of renter households are either cost burdened (paying over 30% of their gross income towards housing costs) or severely cost burdened (paying over 50% of their gross income on housing costs). While there has been improvement, this does not indicate if households were more able to meet their needs over the past five years, or if they had to relocate to more affordable areas in search of housing. Additionally, Mobile lacks larger rentals which indicates that families or larger non-families who rent may have difficulty finding housing that meets their needs. More affordable housing is still needed that gives low-income households access to economic opportunity.

MA-15 Housing Market Analysis: Cost of Housing - 91.210(a)

Introduction

Mobile has seen a 14.6 percent increase in home values and 13.1 percent increase in contract rents in the last five years indicating that the increase in rent has been fairly consistent with home value. While homeowners likely benefit from increasing equity, renters may suffer increased cost burden from the higher rents. The 2018 Consolidated Plan data showed that 95.3 percent of renting households paid less than \$1,000 in rent. The latest ACS data shows that in 2021, only 62.5 percent of renting households paid less than \$1,000 in rent. 8,340 renters currently face a severe cost burden where they spend 50 percent or more of household income on housing.

Cost of Housing

	Base Year: 2017	Most Recent Year: 2021	% Change
Median Home Value	120,800	138,400	14.6%
Median Contract Rent	812	918	13.1%

Table 30 – Cost of Housing

Data Source: 2013-2017 ACS & 2017-2021 ACS

Rent Paid	Number	%
Less than \$500	4,527	13%
\$500-999	17,210	49.5%
\$1,000-1,499	11,555	33.3%
\$1,500-1,999	1,090	3.1%
\$2,000 or more	354	1%
Total	34,736	100.0%

Table 31 - Rent Paid

Data Source: 2017-2021 ACS

Housing Affordability

% Units affordable to Households earning	Renter	Owner
30% HAMFI	5,410	No Data
50% HAMFI	11,375	9,324
80% HAMFI	31,185	17,449
100% HAMFI	No Data	19,717
Total	47,970	46,490

Table 32 – Housing Affordability

Data Source: 2015-2019 CHAS

Monthly Rent

Monthly Rent (\$)	Efficiency (no bedroom)	1 Bedroom	2 Bedroom	3 Bedroom	4 Bedroom
Fair Market Rent	662	690	861	1,148	1,244
High HOME Rent	662	690	861	1,070	1,174
Low HOME Rent	572	613	735	849	947

Table 33 – Monthly Rent**Data Source:** HUD FMR and HOME Rents 2022**Is there sufficient housing for households at all income levels?**

Using HUD median income calculations, there are 48,634 affordable rental and owner-occupied units available for households earning at least 80% median income. From Table 6 in NA-10, there 41,590 households in Mobile earning at least 80% median income. At >30-50% HAMFI, there are 10,810 households and 11,375 rental units affordable to households earning 50% HAMFI. There are also currently 5,410 rental units available for households earning 30% median income and 12,945 households earning 0 – 30% median income. At the same time, the combined waiting lists for the Mobile Housing Authority (MHA), as of January 18, 2023, was 3,426 households. The average household served by MHA earns less than 30% AMI.

These numbers point to an adequate supply of affordable housing at the high end of the income scale, and an inadequate supply of affordable housing for households earning 30% or less area median income.

Type of Housing	Total # units
Public Housing	
R/ECAP tracts	281
Non R/ECAP tracts	325
Project-based Section 8	
R/ECAP tracts	N/A
Non R/ECAP tracts	513
Other Multifamily	
R/ECAP tracts	N/A
Non R/ECAP tracts	287
HCV Program	
R/ECAP tracts	371
Non R/ECAP tracts	1,242

Table 34 - Government Assisted Units by R/ECAP Tracts**Data Source:** AFFHT Tool 2020 Data Decennial Census, ACS

How is affordability of housing likely to change considering changes to home values and/or rents?

As home prices and rental costs have increased since the last Consolidated Plan, affordability challenges will likely continue in Mobile. Median household income has increased from \$40,020 in 2017 to \$44,780 in 2021. At the same time, the changing household income does not indicate whether households are making more money or whether low-income households left the City for more affordable housing.

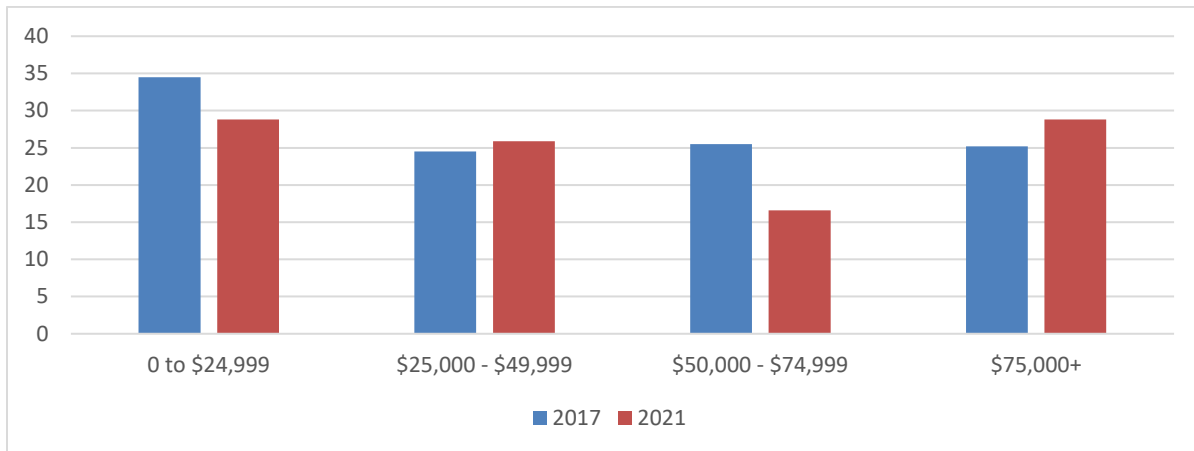


Table 35: Mobile Median Household Income Over Time

Data Source: 2017 – 2021 ACS

How do HOME rents / Fair Market Rent compare to Area Median Rent? How might this impact your strategy to produce or preserve affordable housing?

From Table 32 above, the Fair Market Rents are equal to or higher than the subsidized rental rates for High HOME affordable developments in Mobile, and higher than the Low HOME subsidized affordable development rates. In comparison, the average rental rate for the Mobile MSA was \$1,105 in December 2022⁹. At the same time, the FMR in Mobile was \$690 for a one bedroom, \$861 for a two-bedroom, \$1,148 for a three-bedroom, and \$1,244 for a four-bedroom¹⁰. Increasing rents can create an increase in housing cost burden for low-income households, while higher demand can impact the interest in developers providing subsidized rental units. The City will work with housing developers and community organizations to identify areas/neighborhoods to invest in affordable housing to ensure it meets the needs of the community.

⁹ Zillow Observed Rent Index (ZORI), available at: <https://www.zillow.com/research/data/>

¹⁰ HUD FY 2022 Fair Market Rent Documentation System, available at: https://www.huduser.gov/portal/datasets/fmr/fmrs/FY2022_code/2022summary.odn?&year=2022&fmrtype=Final&cbsasub=

Discussion

The value of homes and cost of rent has increased in Mobile. The median household income has also increased, but 42% renter households are still either cost burdened ($\leq 30\%$) or severely cost burdened ($\leq 50\%$). There also exists a disconnect in the housing supply with an oversupply of units to population at 80% AMI (Area Median Income) and an undersupply of units to population at 30% AMI. This indicates that there is an inadequate supply of homes for low-income households forcing many low-income households into cost burdened housing that may increase housing instability.

This data also indicates the possibility that affordable housing is not necessarily available for rental households in the areas that are desirable for them. As noted in the 2023 Analysis of Impediments (AI), the condition of affordable housing is often in need of minor to significant repair. The AI notes that rentals may be available but may have mold, lead, air quality, and other issues. They also may not be connected to jobs, community amenities, transit, and other opportunities. The average household in Mobile spends 52% of their income towards transportation and housing combined¹¹. A majority (83.5%) of Mobile households spend more than 45% of their household income towards the combined costs of housing and transportation. In consultation with community stakeholders, it was indicated that the public transit offered may be inadequate in providing this connectivity.

When considering the development of affordable housing, proximity to affordable transit, neighborhood amenities, and services must also be considered. Data provided by HUD on Racially and Ethnically Concentrated Areas of Poverty demonstrates that public housing, project-based Section 8, other subsidized multifamily, and HCV program units are primarily located in non R/ECAP tracts indicating that the majority of subsidized housing is integrated into the City. At the same time, there are still 281 public housing units located in neighborhoods that are segregated, have high levels of poverty, and residents lack access to opportunities to improve their financial and educational outcomes.

¹¹ <https://htaindex.cnt.org/map/>

MA-20 Housing Market Analysis: Condition of Housing – 91.210(a)

Introduction

The condition of housing stock is a major component when assessing the overall health of the housing units available to residents in Mobile. According to the 2013-2017 CHAS data, 70% of owner-occupied housing and 59% of renter-occupied housing units were built before 1980. According to 2017-2021 5-Year ACS data, 14.9% of all housing units, or 13,562 housing units, are currently vacant.

Of all 76,083 housing units in Mobile, 50,814 or 67% were built before 1980. Lead was banned from being used as a construction material in 1978 due to its toxicity. Exposure to lead may cause a range of health problems, especially in young children. Lead from paint can seep into things both inside and outside of the home, leaving potential for lead mixed materials to be tracked around a home. The majority of Mobile's housing stock was built during a time that lead was legal as a construction material.

Definitions

Substandard Condition: no major structural defects, adequate plumbing facilities and an appearance which does not create a blighting influence.

Substandard Condition but Suitable for Rehabilitation: The nature of the substandard condition is both financially and structurally feasible for rehabilitation.

The definition of substandard condition but suitable for rehabilitation may also include a quantifiable standard such as a dwelling in which the deficiencies are limited in number and magnitude such that the cost of rehabilitation would not exceed 50% of the replacement cost of the dwelling. Examples of minor repairs may include disability access, lead-based paint remediation, foundation repair, wall repair, window/ door replacements, electrical repair, and/ or roof repair.

A property may be considered in "substandard condition but suitable for rehabilitation" if it is dilapidated or deteriorated beyond feasible economic repair, or rehabilitation will exceed 50% of the replacement cost of the dwelling.

Most owner-occupied units have no selected conditions, while 24% have one condition. 49% of renter-occupied units have at least one selected condition. **Standard Condition:** according to Chapter 52 of the City Code. which is the property maintenance code

Condition of Units

Condition of Units	Owner-Occupied		Renter-Occupied	
	Number	%	Number	%
With one selected Condition	8,509	21.5%	17,295	45.6%
With two selected Conditions	67	0.2%	690	1.8%
With three selected Conditions	9	0.0%	25	0.1%
With four selected Conditions	0	0.0%	0	0.0%
No selected Conditions	30,966	78.3%	19,954	52.6%
Total	39,551	100%	37,964	100%

Table 36 - Condition of Units

Data Source: 2013-2017 ACS

Year Unit Built

Year Unit Built	Owner-Occupied		Renter-Occupied	
	Number	%	Number	%
2000 or later	2,750	7%	4,349	13%
1980-1999	9,580	23%	9,790	29%
1940-1979	25,620	62%	18,410	54%
Before 1940	3,080	8%	1,715	5%
Total	41,030	100%	34,264	100%

Table 37 – Year Unit Built

Data Source: 2015-2019 CHAS

Risk of Lead-Based Paint Hazard

Risk of Lead-Based Paint Hazard	Owner-Occupied		Renter-Occupied	
	Number	%	Number	%
Total Number of Units Built Before 1980	27,154	68.7%	21,822	57.5%
Housing Units built before 1980 with children present	2,384	5.7%	3,010	8.2%

Table 38 – Risk of Lead-Based Paint

Data Source: 2017-2021 ACS (Total Units) 2015-2019 CHAS (Units with Children present)

Vacant Units

	Suitable for Rehabilitation	Not Suitable for Rehabilitation	Total
Vacant Units			
Abandoned Vacant Units			
REO Properties			
Abandoned REO Properties			

Table 39 - Vacant Units**Need for Owner and Rental Rehabilitation**

With a large percentage of the housing stock built before 1980, there is a continued need for owner and rental rehabilitation. The majority of owner-occupied housing (68.7%, Table 38) was built prior to 1980, showing that homeowners are more likely to live in older units. There is currently a vacancy rate of 12.8 percent of all housing units and stakeholders have noted that blight and disrepair is a widespread problem. Community need survey responses also indicated that housing conditions are a top issue.

It is important to note that the 2021 ACS 5-Year poverty rate in Mobile was 20%, and many households may not have the resources needed to address repairs or hazard mitigation on their own. At the same

time, it should be noted that Mobile County had 1,309 eviction cases in 2021¹² and relatively sparse tenant protections in cases of landlord retaliation¹³. Stakeholder interviews indicated that evictions have since increased past 2018 levels after the end of the COVID eviction moratorium. There are also multiple news stories of apartments with mold, and it is unknown if tenants have clear steps of repair and remediation.^{14, 15}

Mobile currently has multiple programs for home repair and other blight remediation. This includes a program which allows the city to take ownership of properties, repair, and sell them, a program that aids minority contractors in rehabbing blighted properties in lower-income neighborhoods with a grant of up to \$20,000 for repairs per unit, and a partnership with Legal Services Alabama to help clear up clouded heir-property titles which can sometimes lead to increased vacancies.¹⁶ Mobile also runs a Critical Repair Program providing grants to needs-based, qualifying homeowners for major repairs.¹⁷ The City's Housing Rehabilitation Program for homeowner repair provides deferred loans to qualified households. The City will continue to administer the Down Payment Assistance program to assist qualified homebuyers with down payment and closing cost assistance. The City also works with local nonprofits on exterior paint work to assist LMI homeowners. Lastly, the City focuses HOME funds on affordable homebuyer activities and plans to invest strategically in multifamily options.¹⁸

Estimated Number of Housing Units Occupied by Low or Moderate Income Families with LBP Hazards

Lead remediation is also a central concern in the city due to the aging housing stock. In 2016, local news released a report of lead found in eight county-wide water systems for the past three years in routine testing. The Engineering Manager for Mobile Area Water & Sewer System (MAWSS) stated in normal annual maintenance, they "typically find 10 out of every 50 goosenecks dug up is made with lead". While MAWSS treats the water with anti-corrosive to halt the potential lead leech.¹⁹ In 2021, MAWSS

¹² Mobile Home-ARP Allocation Plan

¹³ Eviction Lab (2018). Eviction Map. Available at:

<https://evictionlab.org/map/?m=modeled&c=p&b=efr&s=all&r=counties&y=2018&z=7.13&lat=30.92&lon=-87.93&lang=en&l=01097 -88.18 30.70>

¹⁴ NBC15 News (2022). Student says mold problem at Central House Apartment has become health risk. Available at: <https://myNBC15.com/news/local/usa-student-says-mold-problem-at-central-house-apartment-has-become-health-risk>

¹⁵ NBC15 News (2022). Reality Check report results in city inspection at Mobile apartment. Available at: <https://myNBC15.com/news/local/mold-dirty-water-leaks-mother-says-issues-have-persisted-for-months-at-local-townhome>

¹⁶ AL.com (2021). Mobile turns blighted homes into affordable housing: 'These people, they helped me'. Available at: <https://www.al.com/news/2021/11/mobile-turns-blight-into-affordable-housing-these-people-they-helped-me.html>

¹⁷ WRKG (2022) "Mobile Accepting Critical Repair grant applications", available at: <https://www.wkrg.com/mobile-county/mobile-accepting-critical-repair-grant-applications/>

¹⁸ City of Mobile (2021). PY2021 Action Plan.

¹⁹ FOX10 News (2016). FOX10 News Investigation find incidents of lead in local water. Available at: <https://www.fox10tv.com/2016/11/24/fox10-news-investigation-finds-incidents-lead-local-water/>

began efforts to comprehensively test 90,000 lines of water service pipes for lead²⁰. The pilot program began with 280 homes in the Campground Community.²¹ The City also has a contract with the University of Alabama's Safe State Environmental Program to provide testing as necessary.

There is no readily available source of data that would allow for an estimate that precisely gets to this question. See both the response in MA-20 Tables 38 and 39 and the map below for housing stock that is at risk of lead paint. Table 38 shows that 68.7% of all owner-occupied housing units and 57.5% of all renter-occupied housing units were built prior to 1980 and may contain lead-based paint. The map below shows that many of the central neighborhoods of Mobile are in the 90th and above percentile for lead paint concentration in the country.

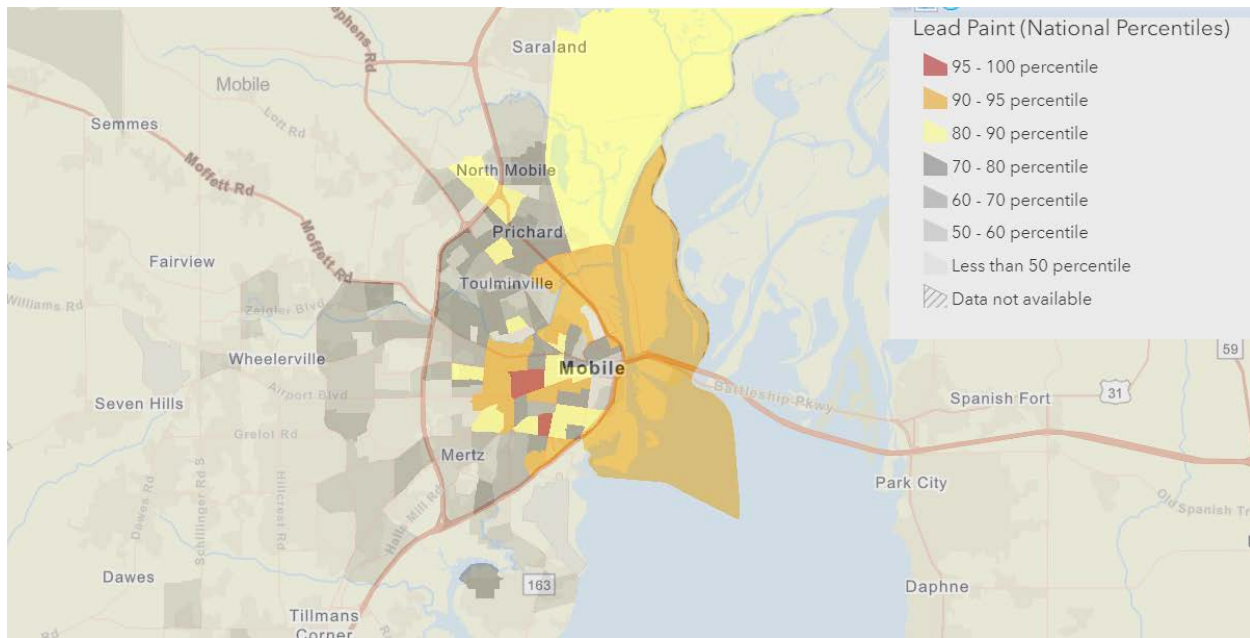


Figure 1: Map of Lead Paint Concentrations

Data Source: EJScreen Environmental Justice Screening and Mapping Tool, data downloaded January 2023

A combination of Table 38 from MA-20 and Table 6 from NA-10 could lead to a reasonable estimate for low- or moderate-income families with LBP hazards. 50,814 housing units in Mobile were built before 1980. Of the 76,105 households in Mobile, 35,125 households, or 46.2% of all households, earn 80% HAMFI or below. Assuming an equal portion of all income brackets are living in homes built before 1980, it is estimated that 23,452 of those are occupied by households that earn less than 80% HAMFI.

Discussion

²⁰ Fox10 News (2021). MAWSS will test 90,000 customers' water services pipes for lead. Available at: <https://myNBC15.com/news/local/mawss-will-test-90000-customers-water-service-pipes-for-lead>

²¹ Mobile Area Water & Sewer System (2021). Press Release for Water Meter Service Line Material Identification Pilot Program. Available at : <https://www.mawss.com/uploads/lead-copper-rule-pilot-program-begins.pdf>

Mobile's aging housing stock and frequent weather events present an increased need for housing repair. Lead remediation is also a concern in the City of Mobile, and MAWSS is currently undertaking a plan to comprehensively test all lead pipes while the City provides owner-occupied repair programs. Lead remediation is a significant cost in repair and rehabilitation work, and can increase the rehab scope of work substantially. It also requires certified contractors who have specialized in safely abating and removing any lead materials. As scopes of work and available funding allow, the City will continue to mitigate lead issues during housing repair projects.

The City and stakeholders also expressed concern on the number of abandoned properties due to inadequate homeowner planning, maintenance, and estate planning. Properties where the homeowner could not maintain or repair the home and then pass on the home to heirs who do not want to manage the property leads to an increase in blight and abandonment. To alleviate neighborhoods from abandoned or blighted properties, the city surveys properties with active code violations annually and provides determinations on any housing units that will not or cannot be repaired by the owner(s). This process has reduced the number of blighted properties within the city from 1625 to 850 blighted units over the past 5 years.

MA-25 Public and Assisted Housing – 91.210(b)

Introduction

The Mobile Housing Authority (MHA), the housing authority for the City of Mobile, operates 1,363 public housing units, which includes units remaining at properties planned for demolition. MHA provides 4,500 Housing Choice vouchers, along with 91 project-based vouchers and special program vouchers (including Veterans Affairs Supportive Housing, Family Unification, Emergency Housing Vouchers), and is assisting 3,544 households through the program.

Data provided in the narrative is based on the MHA 2023 Annual Action Plan, prepared in June 2022²² and additional data provided by MHA which has been included in the Appendix, whereas the data in the tables is from the Office of Public and Indian Housing (PIH) based on prior reporting collected.

Totals Number of Units

	Certificate	Mod-Rehab	Public Housing	Program Type					
				Vouchers					
				Total	Project -based	Tenant -based	Special Purpose Voucher		
							Veterans Affairs Supportive Housing	Family Unification Program	Disabled *
# of units vouchers available			3,405	4,166			31	312	984
# of accessible units									
*includes Non-Elderly Disabled, Mainstream One-Year, Mainstream Five-year, and Nursing Home Transition									

Table 40 – Total Number of Units by Program Type

Data Source: PIC (PIH Information Center)

²² Mobile Housing Authority 2023 Annual Action Plan https://www.mobilehousing.org/files/2022-08-22-2023_Annual_Plan-Public_Review.pdf

Describe the supply of public housing developments:

MHA currently operates 1,363 units. In its 2023 Action Plan, MHA states intention to demolish the Thomas James Place, R.V. Taylor Plaza, and Boykin Tower developments due to the poor conditions of the properties by 2026. The removal of these developments reduces the number of public housing units by 50% from prior years. The current count includes 285 units in these buildings that remain occupied but are to be vacated before demolition, reducing the total number of operational units to 1,078 by 2026.

Describe the number and physical condition of public housing units in the jurisdiction, including those that are participating in an approved Public Housing Agency Plan:

All 1,363 public housing units are occupied. The developments identified for demolition were determined to be too costly to rehabilitate, and conditions at all three locations are no longer suitable for living. The remaining units under MHA's management have rehabilitation needs and MHA is looking at a modernization plan using the Rental Assistance Demonstration (RAD) Program.

Public Housing Condition

Public Housing Development	Average Inspection Score
Mobile Housing Authority	79

Table 41 - Public Housing Condition**Describe the restoration and revitalization needs of public housing units in the jurisdiction:**

MHA will work with the City's Department of Community and Housing Development to develop a long-term strategy for redevelopment and maintenance of public housing units. The 2023 Action Plan identified four developments (Orange Grove Homes, Central Plaza Towers, Oaklawn Homes, and Gulf Village) prioritized for renovations and conversion to project-based vouchers through RAD between 2022 and 2024.

Describe the public housing agency's strategy for improving the living environment of low- and moderate-income families residing in public housing:

MHA provides residents with programs and services to assist families and build lifestyle and economic independence skills through resident engagement. MHA partners with the City of Mobile and community organizations to provide opportunities for training, employment, and other needs for health and housing. The Community & Family Empowerment Department offers the Family Self-Sufficiency Program which focuses on economic independence.

Discussion:

The Mobile Housing Authority has been managing housing developments in critical need of renovations and maintenance and has determined it is more cost effective to demolish half of its housing stock than to repair it. MHA is operating at full capacity with all other public housing units occupied and a maintains a consistent waiting list for units and vouchers. MHA plans to rehabilitate its remaining developments through the RAD program. Additionally, MHA plans to issue project-based vouchers to help support the development of new affordable housing.

The MHA households currently housed in units slated for demolition will be provided with HCVs due to no other availability within MHA-managed properties. Given the limited participation from landlords in accepting HCVs, families may need additional support from MHA and partners finding safe and affordable replacement housing in the higher cost, high demand rental market. The loss of the public housing units and increased reliance on HCVs will put greater strain on the limited amount of affordable housing units within the city. MHA and the City will monitor available rental stock for households at risk for severe cost burden and work with landlords to encourage or incentivize participation in accepting HCVs.

MA-30 Homeless Facilities and Services – 91.210(c)

Introduction

The City of Mobile provides funding through ESG to organizations that assist homeless persons. These organizations provide a multitude of supportive services for those experiencing homelessness, ranging from street outreach and food distribution to providing emergency shelter, counseling services, and permanent housing. The CoC partners with the City of Mobile as well as Mobile and Baldwin Counties to effectively administer these services.

Facilities and Housing Targeted to Homeless Households

	Emergency Shelter Beds		Transitional Housing Beds	Permanent Supportive Housing Beds	
	Year Round Beds (Current & New)	Voucher / Seasonal / Overflow Beds	Current & New	Current & New	Under Development
Households with Adult(s) and Child(ren)	180	3	96	21	0
Households with Only Adults	134	5	57	230	0
Chronically Homeless Households	0	0	0	94	0
Veterans	0	0	58	60	0
Unaccompanied Youth	0	0	0	0	0

Table 42 - Facilities and Housing Targeted to Homeless Households

Describe mainstream services, such as health, mental health, and employment services to the extent those services are used to complement services targeted to homeless persons.

The mainstream services such as health care are provided by the Infirmary Hospital, University of South Alabama Women and Children's Hospital, and USA Medical, Springhill Hospital, Providence Hospital. Franklin Health Center provides health care services to the low income and homeless population. AltaPoint Mental Health Systems provides mental health services and permanent housing for the chronically homeless. Employment services, workforce development is provided by Mobile Works, and GED training and assistance is provided by Bishop State College. Salvation Army provides employment services. These services are available to the homeless population and the service providers coordinate the referrals with the applicable institutions.

List and describe services and facilities that meet the needs of homeless persons, particularly chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth. If the services and facilities are listed on screen SP-40 Institutional Delivery Structure or screen MA-35 Special Needs Facilities and Services, describe how these facilities and services specifically address the needs of these populations.

The AltaPointe Health Systems - Provides mental health services and permanent housing for the chronic and disabled homeless, including Shelter Plus care.

Catholic Social Services - Provides permanent housing for the disabled homeless, rapid-re-housing and homeless prevention.

Dumas Wesley/Sybil Smith Family Village - Transitional housing for women with children and support services.

Family Promise of Coastal Alabama - Temporary shelter and supportive services to intact homeless families with children and coordinates the Interfaith Hospitality Network Shelter Program.

Housing First, Inc. - Community Housing Program, Homeless prevention and Rapid Re-housing (HPRP), permanent housing for the disabled homeless, scattered transitional housing for families, operation of Homeless Management Information System and planning.

Inner-city Mission/McKemie Place - Emergency overnight shelter for homeless single women.

Mobile Housing Board - HUD-VASH, housing for the disabled and frail elderly, families with children.

Penelope Housing - Housing for victims of domestic violence, transitional housing, counseling services.

Salvation Army - Center for women and children, project able, transient lodge for men, jobs program.

St. Mary's Home - Opportunities for Independent Living.

Waterfront Rescue Mission - Transient Lodge for Men.

Ozanam Charity Pharmacy - Free prescription medication assistance.

WAVE Transit - Affordable public transportation.

MA-35 Special Needs Facilities and Services – 91.210(d)

Introduction

Mobile residents with special needs have access to services and support throughout the region. However, the demand for accessible affordable housing, affordable healthcare, and other services outweighs the supply.

Including the elderly, frail elderly, persons with disabilities (mental, physical, developmental), persons with alcohol or other drug addictions, persons with HIV/AIDS and their families, public housing residents and any other categories the jurisdiction may specify, and describe their supportive housing needs

Throughout the City, there is a network of service providers that assist individuals with special needs. Organizations such as the Independent Living Center, Mobile ARC, and Goodwill Easterseals Gulf Coast provide services such as healthcare, housing, transportation, and job and skills training for persons with disabilities and the elderly.

In addition to public housing developments and vouchers, which provide housing for 1,106 elderly individuals and 1,296 disabled families, there are 923 units funded through CDBG grants, and 792 units funded through HOME grants across Mobile that serve low-income households. Many of these units are designated for seniors or persons with disabilities.

In addition to testing and other healthcare and counseling services, AIDS Alabama provides housing assistance and housing for people with HIV/AIDS.

The network of service providers that serve homeless persons or those at risk of becoming homeless provide services that seek to meet the diverse needs of this population.

The AltaPoint Health Systems - Provides mental health services and permanent housing for the chronic and disabled homeless, including Shelter Plus care.

Catholic Social Services - Provides permanent housing for the disabled homeless, rapid-re-housing and homeless prevention.

Dumas Wesley/Sybil Smith family Village - Transitional housing for women with children and support services.

Family Counseling Center of Mobile, Inc. – Provides counseling, assistance, service referral, and education.

Family Promise of Coastal Alabama - Temporary shelter and supportive services to intact homeless families with children and coordinates the Interfaith Hospitality Network Shelter Program.

Franklin Primary Health Center – Provides community healthcare to unhoused and other low-income populations.

Housing First, Inc. - Community Housing Program, Homeless prevention and Rapid Re-housing (HPRP), permanent housing for the disabled homeless, scattered transitional housing for families, operation of Homeless Management Information System and planning.

Inner-city Mission/McKemmie Place - Emergency overnight shelter for homeless single women.

Mary's Shelter Gulf Coast – Shelters for mothers and newborns.

Mobile Housing Authority – HUD-VASH, housing for the disabled and frail elderly, families with children.

Ozanam Pharmacy – Provides \$0 prescriptions as a charitable pharmacy.

Penelope Housing – Housing for victims of domestic violence, transitional housing, counseling services.

Salvation Army of Coastal Alabama – Runs both Dauphin Way Lodge, a substance use residential and outreach treatment center, and Family Haven, a shelter for both single and two-parent families.

Describe programs for ensuring that persons returning from mental and physical health institutions receive appropriate supportive housing

The City of Mobile adopted the following Discharge Policy Statement for Homeless Citizens in March 2007:

“It is the policy of the City to prevent homelessness by encouraging local and publicly funded institutions or systems of care to contact with Housing First, Inc., the Homeless Coalition for discharge planning consultation and assistance regarding citizens known to be homeless or who could become homeless at the time of discharge.”

Housing First, Inc., as the lead organization for the CoC that serves The City of Mobile, provides discharge planning consultation to publicly funded institutions and system of care regarding citizens known to be homeless or at risk of becoming homeless at the time of discharge, and to provide assistance for facilitating access to services and housing that could end or prevent homelessness for these citizens.”

Protocols for discharging homeless persons from institutions and facilities are in effect for the following: Foster care, health care facilities, mental health system, AltaPoint Health Systems and Corrections facilities. The State of Alabama Department of Corrections has a basic policy for requiring an address for prisoners who will be released on probation. Therefore, such individuals are not considered homeless at the time of release.

Specify the activities that the jurisdiction plans to undertake during the next year to address the housing and supportive services needs identified in accordance with 91.215€ with respect to persons who are not homeless but have other special needs. Link to one-year goals.

91.315(e)

The City of Mobile will provide \$340,400 in PY2023 to organizations providing services to seniors, persons with disabilities, and youth. These services include transitional work training programs, access to affordable prescription medication, community outreach and engagement geared at seniors, and programs to provide youth with enrichment opportunities.

For entitlement/consortia grantees: Specify the activities that the jurisdiction plans to undertake during the next year to address the housing and supportive services needs identified in accordance with 91.215(e) with respect to persons who are not homeless but have other special needs. Link to one-year goals. (91.220(2))

The City of Mobile will provide \$340,400 to organizations providing services to seniors, persons with disabilities, and youth. These services include transitional work training programs, access to affordable prescription medication, community outreach and engagement geared at seniors, and programs to provide youth with enrichment opportunities. These programs will serve an estimated 1,450 individuals.

MA-40 Barriers to Affordable Housing – 91.210(e)

Negative Effects of Public Policies on Affordable Housing and Residential Investment

Barriers to affordable housing were identified through the Analysis of Impediments to Fair Housing Choice (AI) and Consolidated Plan process.

Access to Opportunity: Mobile’s racially and ethnically concentrated areas of poverty neighbor each other on the westside of the City. Many of these neighborhoods lack parks, recreation, health services, and other needed community amenities. At the same time, stakeholders indicate that public transit often lacks the coverage and frequency needed to connect housing to job opportunities.

Loss of Naturally Occurring Affordable Housing: The majority of Mobile’s housing stock is single-family detached housing followed by 5-19 unit large apartments. Since the 2018, Mobile has lost about 2,000 units in 2-4 unit structures. This indicates that older “missing middle” housing is likely being demolished while large apartments are being built. At the same time, both stakeholders and surveys indicate that there is a large amount of blight and homes falling in disrepair with homeowners that may lack the funds to repair the units.

Lending Policies and Practices: Homeownership provides a path towards building wealth and gaining long-term housing stability. At the same time, low-income households and protected classes continue to lack access to fair lending opportunities or lag behind in the economic benefits associated with homeownership due to the lingering effects of historic lending practices and policies that systematically excluded members of protected classes from homeownership opportunities. While the population of Mobile County is 36% Black or African American, just 22% of mortgages in 2021 were given to Black or African American borrowers. Additionally, the average loan amount was lower for Black or African American borrowers than White borrowers. Similarly, the average loan amount for Hispanic or Latino borrowers was slightly lower than for White borrowers. Black or African American applicants and Hispanic or Latino applicants are denied loans at a higher rate than White applicants. Debt-to-income ratio and credit history are the main reasons for loan denials in Mobile County.

Private Real Estate Practices: Certain language and practices found in online listings could discourage or place undue burden on some renters or buyers. Some listings in Mobile target investors willing to purchase a property as-is, which limits the availability of housing for non-investor buyers or buyers who do not have the capital or time to renovate the property. Many rentals require non-refundable lease application fees, deposits, and monthly pet fees that may be prohibitive to some renters. Some rental units in Mobile require documentation of income and background checks to qualify. Further, some rentals explicitly do not accept housing vouchers and exclude prospective renters using housing vouchers in an already limited rental market.

MA-45 Non-Housing Community Development Assets – 91.215 (f)

Introduction

In determining priorities for the allocation of federal funds, the City of Mobile must continue to generate new opportunities for economic success that focus on providing long-term solutions for current and future residents. The city will continue to promote economic development through various programs to help companies expand and create jobs.

The Office of Supplier Diversity oversees certification, compliance, training, outreach, and capacity building for the City of Mobile Equal Business Opportunity Programs. Anchored by the State and Local Disadvantaged Business Certification Program, the City's Equal Business Opportunity programs are designed to identify disadvantaged business enterprises (DBE), service-disabled veteran owned, woman owned business (WBE) and small businesses (SBE) according to discrete certification standards, and then to mitigate the effects of past and present social-disadvantage and economic-disadvantage by increasing the opportunity of DBEs in the procurement of goods and services by the City of Mobile. The Office of Supplier Diversity will concentrate efforts on improving its effectiveness in four key areas:

- Increase the number of available and capable certified minority, women and disadvantaged owned firms for the City of Mobile,
- Increase the number and the dollar amount of procurements with City of Mobile-certified DBE firms,
- Improve compliance and monitoring of DBE participation on City of Mobile contracts, and
- Help the City of Mobile-certified DBE firms build more competitive and sustainable businesses for the benefit of the city and citizens of the City of Mobile.²³

In partnership with Bishop State Community College, the city is offering a curriculum called the “Contractor's College: Project Management and Crew Leadership” aimed at helping small businesses compete for, receive, and manage public contracts. The program covers basic leadership skills and explains different leadership styles, communications, delegating, and problem-solving. It will also cover job-site safety and the role that crew leaders play in ensuring the safety of their team members. This program is designed to assist contractors, as well as people interested in contracting, recently promoted crew leaders, and anyone else in management.²⁴

²³ <https://www.cityofmobile.org/business/osd/about-osd/>

²⁴ <https://www.bishop.edu/news/bishop-state-city-of-mobile-partner-to-launch-contractors-college>

As part of its most recent expansion initiative, the Mobile Airport Authority is relocating its commercial passenger service from its West Mobile location to the Brookley Aeroplex in the southeast area of the city. The new facility will have the capability to handle international cargo and international passengers, thereby attracting more travelers.²⁵

Within the past 6 years, both Walmart and Amazon have opened distribution centers in Mobile City. The Amazon facility services the coastal region that extends from portions of Florida into Louisiana,²⁶ while the new Walmart Distribution Center supplies several regional distribution centers that support approximately 700 Walmart stores in Alabama, Mississippi and beyond.²⁷ The new facilities will contribute to economic growth in the region while providing career opportunities for residents.

AM/NS Calvert, recognized as one of the most advanced steel finishing facilities in the world, broke ground on a \$775 million dollar expansion to construct a massive new steelmaking facility at their production site near Mobile. This expansion project will add an electric arc furnace that will be able to produce 1.5 million tons of steel slabs per year. The new facility is expected to create 200 direct and 100 indirect jobs in the community.²⁸

Economic Development Market Analysis

Combining to employ 33,498 residents, the top three employment sectors by the number of workers employed are:

1. Education and health care services
2. Retail trade
3. Arts, entertainment, accommodations

In 2021, there were 87,274 individuals in the civilian labor force, 47% of Mobile's overall population, with an unemployment rate of 6.4%. According to 2021 American Community Survey data, the median income for households was \$44,780. Notably, married-couple family households had a median income of \$82,976 while nonfamily households had a median income of \$30,041. Nonfamily households consist of

²⁵ <http://www.mobairport.com/masterplan/>

²⁶ https://www.al.com/news/mobile/2017/07/amazon_facility_in_mobile_open.html

²⁷ <https://www.madeinalabama.com/2018/08/walmart-distribution-center/>

²⁸ <https://www.alabamane.wscenter.com/2021/02/19/am-ns-calvert-kicks-off-construction-on-775-million-steelmaking-facility/>

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single person households as well as households with unrelated individuals living together. The median household income for Mobile City married-couple family households is approximately \$6,000 lower than the median income for the same households in Mobile County (\$51,169).

Table 51 shows that household earnings in Mobile are reflective of educational attainment. Median earnings for those with a bachelor's degree is 2.7 times higher than those with a high school diploma (or equivalent) only. Of those Mobile residents 25 years of age or older, 41% have a high school diploma (GED or equivalent alternative) or less and 26% have a bachelor's degree or more.

Business Activity

Business by Sector	Number of Workers	Number of Jobs	Share of Workers %	Share of Jobs %	Jobs less workers %
Agriculture, Mining, Oil & Gas Extraction	403	137	0.5%	0.1%	0.4%
Arts, Entertainment, Accommodations	9,654	13,948	12.5%	11.0%	1.5%
Construction	465	763	0.6%	0.6%	0.0%
Education and Health Care Services	19,047	32,502	24.6%	25.6%	-0.9%
Finance, Insurance, and Real Estate	3,968	7,440	5.1%	5.8%	-0.7%
Information	1,091	2,193	1.4%	1.7%	-0.3%
Manufacturing	4,848	8,484	6.3%	6.7%	-0.4%
Other Services	2,254	3,926	2.9%	3.1%	-0.2%
Professional, Scientific, Management Services	4,521	9,563	5.8%	7.5%	-1.7%
Public Administration	2,863	3,685	3.7%	2.9%	0.8%
Retail Trade	10,142	15,863	13.1%	12.5%	0.6%
Transportation and Warehousing	3,989	6,158	5.2%	4.8%	0.3%
Wholesale Trade	2,912	6,309	3.8%	5.0%	-1.2%
Total	77,389	127,186			

Table 43 - Business Activity

Data Source: Census.gov On The Map Tool, available at: <https://onthemap.ces.census.gov/>

Labor Force

Total Population in the Civilian Labor Force	87,274
Civilian Employed Population 16 years and over	81,668
Unemployment Rate	6.4%
Unemployment Rate for Ages 16-24	10.9%
Unemployment Rate for Ages 25-65	6.1%

Table 44 - Labor Force

Data Source: 2017-2021 ACS

Occupations by Sector	Number of People
Management, business and financial	30,712
Farming, fisheries and forestry occupations	215
Service	16,071
Sales and office	16,937
Construction, extraction, maintenance and repair	3,543
Production, transportation and material moving	11,879

Table 45 – Occupations by Sector

Data Source: 2017-2021 ACS

Travel Time

Travel Time	Number	Percentage
< 30 Minutes	55,122	72.7%
30-59 Minutes	17,126	22.6%
60 or More Minutes	3,610	4.8%
Total	75,858	100%

Table 46 - Travel Time

Data Source: 2017-2021 ACS

Education:

Educational Attainment by Employment Status (Population 16 and Older)

Educational Attainment	In Labor Force		Not in Labor Force
	Civilian Employed	Unemployed	
Less than high school graduate	3,983	996	4,727
High school graduate (includes equivalency)	17,200	1,334	10,562
Some college or Associate's degree	19,836	1,132	7,367
Bachelor's degree or higher	24,908	797	3,807

Table 47 - Educational Attainment by Employment Status

Data Source: 2017-2021 ACS

Educational Attainment by Age

	Age				
	18–24 yrs	25–34 yrs	35–44 yrs	45–65 yrs	65+ yrs
Less than 9th grade	52	621	414	630	1,150
9th to 12th grade, no diploma	1,382	2,506	1,744	3,350	2,721
High school graduate, GED, or alternative	7,018	8,540	4,970	13,950	10,880
Some college, no degree	5,687	6,103	5,095	11,820	6,551
Associate's degree	1,316	2,835	1,558	3,722	1,825
Bachelor's degree	1,656	4,893	4,157	6,688	4,625
Graduate or professional degree	403	2,443	2,785	4,751	4,485

Table 48 - Educational Attainment by Age

Data Source: 2017 - 2021 ACS

Educational Attainment – Median Earnings in the Past 12 Months

Educational Attainment	Median Earnings in the Past 12 Months
Less than high school graduate	\$ 21,129
High school graduate (includes equivalency)	\$ 29,585

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Educational Attainment	Median Earnings in the Past 12 Months
Some college or associate's degree	\$ 32,299
Bachelor's degree	\$ 47,847
Graduate or professional degree	\$ 62,378

Table 49 – Median Earnings in the Past 12 Months

Data Source: 2017 – 2021 ACS

Based on the Business Activity table above, what are the major employment sectors within your jurisdiction?

Just over half of all workers are employed in one of three sectors: Education and Health Care Services, Retail Trade, or Arts, Entertainment, Accommodations. In 2021, HUD recorded the top three employers in Mobile as University of South Alabama (6,000 employees), Infirmary Health Systems (5,750 employees), and a manufacturing company named Austal USA (4,000 employees)²⁹. In 2021, employment continued rebounding from the COVID-19 recession as total nonfarm payrolls increased by 5 percent compared to the previous year. Leisure and hospitality, wholesale and retail, and transportation and utilities were amongst the highest growth sectors rebounding after 2020³⁰.

Describe the workforce and infrastructure needs of the business community:

The Mobile labor force is made up of 87,274 residents, of which, 81,668 are employed. The unemployment rate of 6.4% is down slightly from 6.5% in the 2018 5-Year estimate. The median earning for a worker is \$31,736, but this is disparate amongst genders with male, full time, year-round workers making \$49,355 and female, full-time, year-round workers making \$37,357.

The city has good institutional infrastructure to support its economic development initiatives and business community; however, there is a need to improve the quality of the workforce so they can take advantage of the available jobs and new jobs to be created. According to US News, of all Mobile County high school students, only 30% have math test score proficiency and only 26% have reading test score proficiency³¹. As many of the growing sectors require specialized education, there is a need for increased educational proficiency.

²⁹ HUD PD&R (2021). Housing Market Profiles: Mobile, Alabama. Available at: <https://www.huduser.gov/portal/periodicals/USHMC/reg//MobileAL-HMP-July21.pdf>

³⁰ Ibid.

³¹ US News. Mobile County Public Schools. Available at: <https://www.usnews.com/education/k12/alabama/districts/mobile-county-107265>

27% of the Mobile workforce lives more than 30 minutes away from their job. The city is putting efforts to improving the transportation connectivity of alternative transportation with the Broad Street Initiative, Mobile Greenway Initiative, and Capital Improvement Plan (CIP) which includes the improvement of sidewalks and other infrastructure for walkability³². The WAVE Transit Bus System changed management in 2018 and the routes have been adjusted to improve ridership. In 2021, Mobile made plans to add nine buses and ten mobility vans to the fleet using COVID pandemic related relief money.³³

Describe any major changes that may have an economic impact, such as planned local or regional public or private sector investments or initiatives that have affected or may affect job and business growth opportunities during the planning period. Describe any needs for workforce development, business support or infrastructure these changes may create.

The City of Mobile is in plans to contribute \$30 million to a \$252 million effort to build a new, five gate commercial airport close to downtown. The new airport will meet international designation and connect Mobile's businesses to a more international economy.³⁴ Other developments include an Airbus expansion with an investment of more than \$1 billion and a new Amazon sortation center developed in 2018 that created 360 part-time jobs and 1,000 seasonal jobs³⁵. Additionally, the City of Mobile is continuing to work on the Mobile Tourism Initiative which launched in 2015 as a partnership between the city, Visit Mobile, the Chamber, and other stakeholders. Since launch, Carnival Cruise has resumed operations, ecotourism and cultural tourism efforts have continued, and an Africatown Welcome Center Project is underway³⁶. Some other growth includes a new \$19 million facility at the Port of Mobile in 2022, plans for steel manufacturing company ArcelorMittal to invest \$775 million in expanding production, Myer Marine to invest \$5.5 million in its steel fabrication facility, and Berg Pipe Mobile to invest \$15 million to expand its pipe making facility.³⁷

³² Map for Mobile Framework for Growth (2021). Five-Year Status Report to the Community. Available at: <https://mapformobile.org/wp/wp-content/uploads/2021/06/FiveYearReport2020.pdf>

³³ AL.com (2021). Mobile unveils new buses as mayoral candidates pitch transit plans. Available at: <https://www.al.com/news/mobile/2021/07/mobile-unveils-new-buses-as-mayoral-candidates-pitch-transit-plans.html>

³⁴ AL.com (2022). 'Mobile International Airport' can now be part of the conversation. Available at: <https://www.al.com/news/mobile/2022/04/mobile-international-airport-can-now-be-part-of-the-conversation.html>

³⁵ Map for Mobile Framework for Growth (2021). Five-Year Status Report to the Community. Available at: <https://mapformobile.org/wp/wp-content/uploads/2021/06/FiveYearReport2020.pdf>

³⁶ Ibid.

³⁷ HUD PD&R (2021). Housing Market Profiles: Mobile, Alabama. Available at: <https://www.huduser.gov/portal/periodicals/USHMC/reg//MobileAL-HMP-July21.pdf>

How do the skills and education of the current workforce correspond to employment opportunities in the jurisdiction?

The Mobile Area Workforce Alliance Plan of Action states that the “Mobile area is experiencing unprecedented economic growth with a growing number of jobs in aviation, shipbuilding and repair, advanced manufacturing (e.g., steel, chemical, aluminum), logistics, healthcare, engineering, construction and business (e.g. accounting, law, information technology)”³⁸. Many of the growing sectors listed above require specialized skills. Table 45 shows that there is a mismatch where workers are needed in Education and Health services and Professional, Scientific, Management Services. At the same time, those fields most often require degrees or other training. Mobile has three colleges which offer many majors including education, health sciences, nursing, engineering, and science degrees. Additionally, both the community colleges and University of South Alabama offer workforce education programs with job coaches which offer an alternative to pursuing academic degrees³⁹.

Describe any current workforce training initiatives, including those supported by Workforce Investment Boards, community colleges and other organizations. Describe how these efforts will support the jurisdiction's Consolidated Plan.

In 2022, the Mobile Area Workforce Alliance was formed between local school systems, the Mobile Area Education Foundation (MAEF), the university and community colleges, Alabama Industrial Development Training (AIDT), Southwest Alabama Partnership for Training and Employment (SWAPTE), South Alabama Workforce Development Council (SAWDC), and the Mobile Chamber to create a plan of success for developing the workforce of the future. The plan outlines the need to recruit workers from underrepresented groups, create education programs to teach the needed skills, expand dual high school enrollment programs, create more communication between industry professionals and students, create more internships and apprenticeships, and increase public messaging about the growing sectors, etc.⁴⁰

Additionally, AIDT is an independent agency that provides workforce development services in Mobile, and throughout Alabama. In response to increased employment opportunities in the maritime industry, the Maritime Training Center was opened in 2010. Operated by AIDT, the center trains individuals in a variety of technical skills as well as office management and leadership skills. The training center also provides specialized trainings to companies at-large, as well working in direct partnership with local high schools.

³⁸ Mobile Chamber (2022). Mobile Area Workforce Plan of Action, available at: <https://mobilechamber.com/wp-content/uploads/2022/10/Mobile-Area-Workforce-Alliance-Plan-of-Action.pdf>

³⁹ Ibid.

⁴⁰ Mobile Chamber (2022). Mobile Area Workforce Plan of Action, available at: <https://mobilechamber.com/wp-content/uploads/2022/10/Mobile-Area-Workforce-Alliance-Plan-of-Action.pdf>

Employment opportunities have come in the aviation industry as well. The Alabama Aviation Training Center provides workforce training for the aviation industry and will eventually serve as the official Airbus training facility. The \$6.5 million center will be funded by the Alabama Governor's Office and Airbus through reimbursements from AIDT.

Through the Mayor's program, Youth Empowered Success (YES), the Mobile Housing Board, Bishop State Business and Technology Center, and the University of South Alabama Hospitality and Workforce Alliance are working with 250 individuals between ages 14-29 to provide training and paid summer internships.

The City of Mobile provides training and on-demand assistance to local Disadvantaged Business Enterprises (DBEs) through the Office of Supplier Diversity Manager. By offering assistance on a variety of issues, from obtaining a business license from the City of Mobile to working with the City to provide training on responding to requests for services, the goal of this City office is to assist DBEs in the opportunity to provide goods and services to the City of Mobile.

Does your jurisdiction participate in a Comprehensive Economic Development Strategy (CEDS)?

No.

If so, what economic development initiatives are you undertaking that may be coordinated with the Consolidated Plan? If not, describe other local/regional plans or initiatives that impact economic growth.

The City of Mobile continues to support economic development by investing infrastructure through the Capital Improvement Plan, building capacity of local businesses through the Office of Supplier Diversity, and engaging in major planning efforts, including Map for Mobile and an overhaul of local zoning codes. The City also supports efforts of local and regional partners economic development partners such as the Mobile Area Chamber of Commerce, Alabama Department of Economic and Community Affairs, Economic Development Partnership of Alabama, Port of Mobile, Mobile Aeroplex at Brookley, Alabama Power Company, Mobile Gas, and the University of South Alabama.

Discussion

With a plan to shift commercial air service from Mobile Regional Airport to the Mobile Downtown Airport at Brookley, there are opportunities to capture new passengers and increase tourism. This relocation will better serve the regional travel market and provide better access to downtown Mobile. Further, the Mobile Downtown Airport is located near numerous hotels, restaurants, and a cruise terminal to provide connectivity for tourists visiting Mobile.

The city has good institutional infrastructure to support its economic development initiatives and business community; however, there is a need to improve the quality of the workforce so they can take advantage of the available jobs and new jobs to be created. Workers are needed in the Education and Health Services and Professional, Scientific, Management Services, industries that often require advanced degrees or other specialized training.

Regarding education, there is a need for equitable access to opportunities in K-12 education with a focus on the public education system. Stakeholders indicated a need to implement programs to support low-to-moderate income students, reduce gun violence and incarceration in Mobile schools.

MA-50 Needs and Market Analysis Discussion

Are there areas where households with multiple housing problems are concentrated? (include a definition of "concentration")

Mobile has 12 racially/ethnically-concentrated areas of poverty (R/ECAP) as identified by HUD, most of which are located east of Highway 65. The below map shows Racially and Ethnically Concentrated Areas of Poverty (R/ECAPs). R/ECAPs are defined as census tracts that both have a non-white population of 50 percent or more and have 40 percent or more of individuals living at or below the poverty line.

Additionally, there is a racial concentration of housing problems with Hispanic and Black, Non-Hispanic households having the highest percent of households experiencing any of four housing problems.

Households experiencing any of 4 housing problems	# with problems	# households	% with problems
Race/Ethnicity			
White, Non-Hispanic	23,410	97,625	24.0%
Black, Non-Hispanic	22,740	53,395	42.6%
Hispanic	1,570	3,459	45.4%
Asian or Pacific Islander, Non-Hispanic	795	2,654	30.0%
Native American, Non-Hispanic	237	1,463	16.2%
Other, Non-Hispanic	575	1,763	32.6%
Total	49,320	160,375	30.8%

Table 50: Housing Problems by Race

Data Source: HUD AFFHT Tool 2020

Are there any areas in the jurisdiction where racial or ethnic minorities or low-income families are concentrated? (include a definition of "concentration")

There are currently 18 R/ECAPs in the County and 12 R/ECAPs located within the City of Mobile.

What are the characteristics of the market in these areas/neighborhoods?

Much of the industrial zoning is located either in the City's R/ECAPs or adjacent to the East. This may increase the exposure to environmental stressors and degradation. The neighborhoods towards the East of the city are also the most susceptible to flooding and storm damage.

Are there any community assets in these areas/neighborhoods?

Many of the R/ECAPs in Mobile surround the downtown, but some are separated by I-10 which may result in connectivity issues. The below map shows that most medical facilities, parks, libraries, and other forms of recreation are not located in R/ECAPs, and these neighborhoods may have limited access to community amenities. While public transportation is very limited in Mobile, the neighborhoods east

of Highway 65 are better served than many neighborhoods throughout the city. Furthermore, plans are currently underway to create a 98-acre waterfront park along Mobile Bay which will add needed park space to the east side of the City.

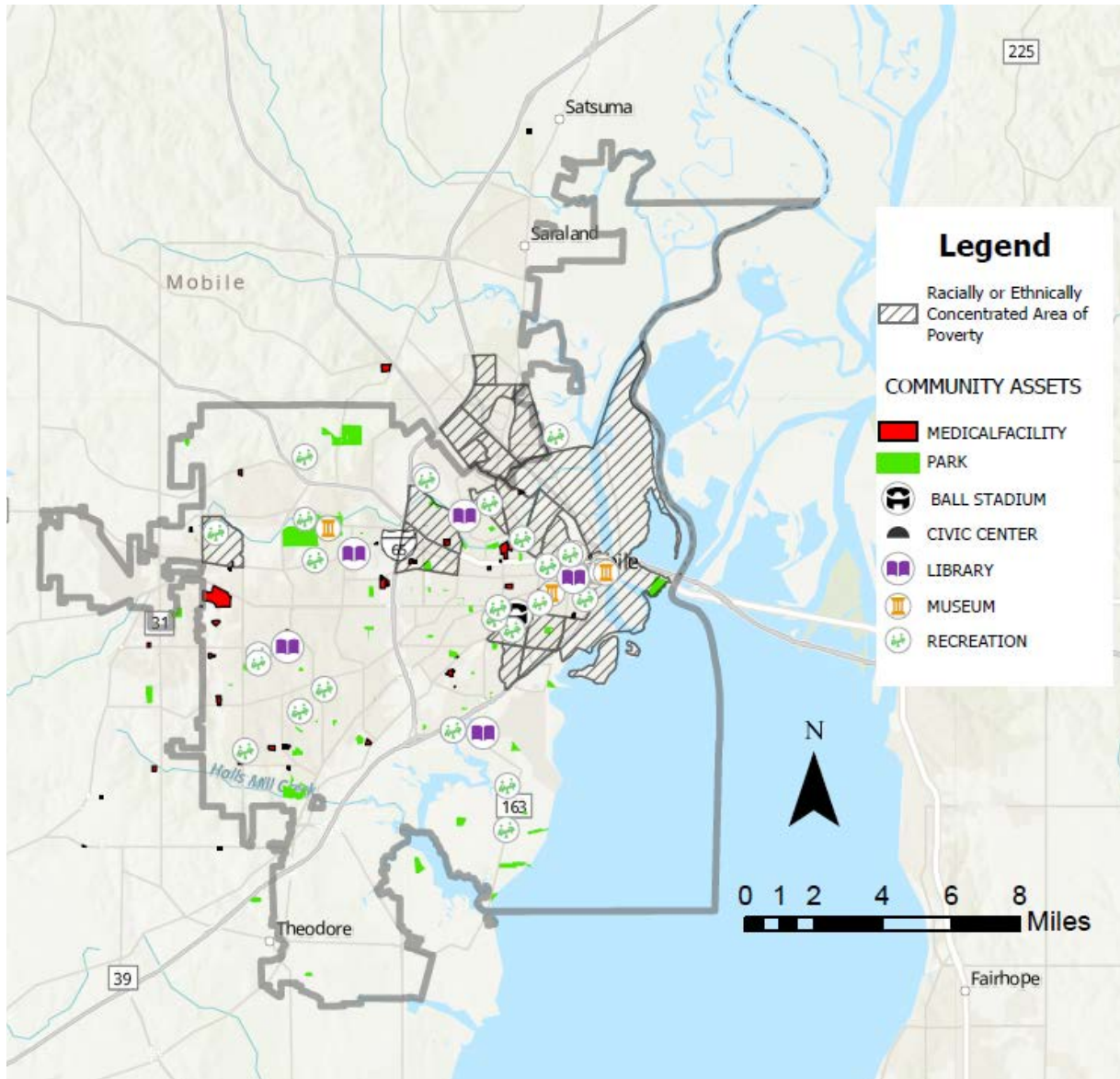


Figure 2: Map of Community Amenities and R/ECAPs

Data Source: Mobile GIS Opensource Data

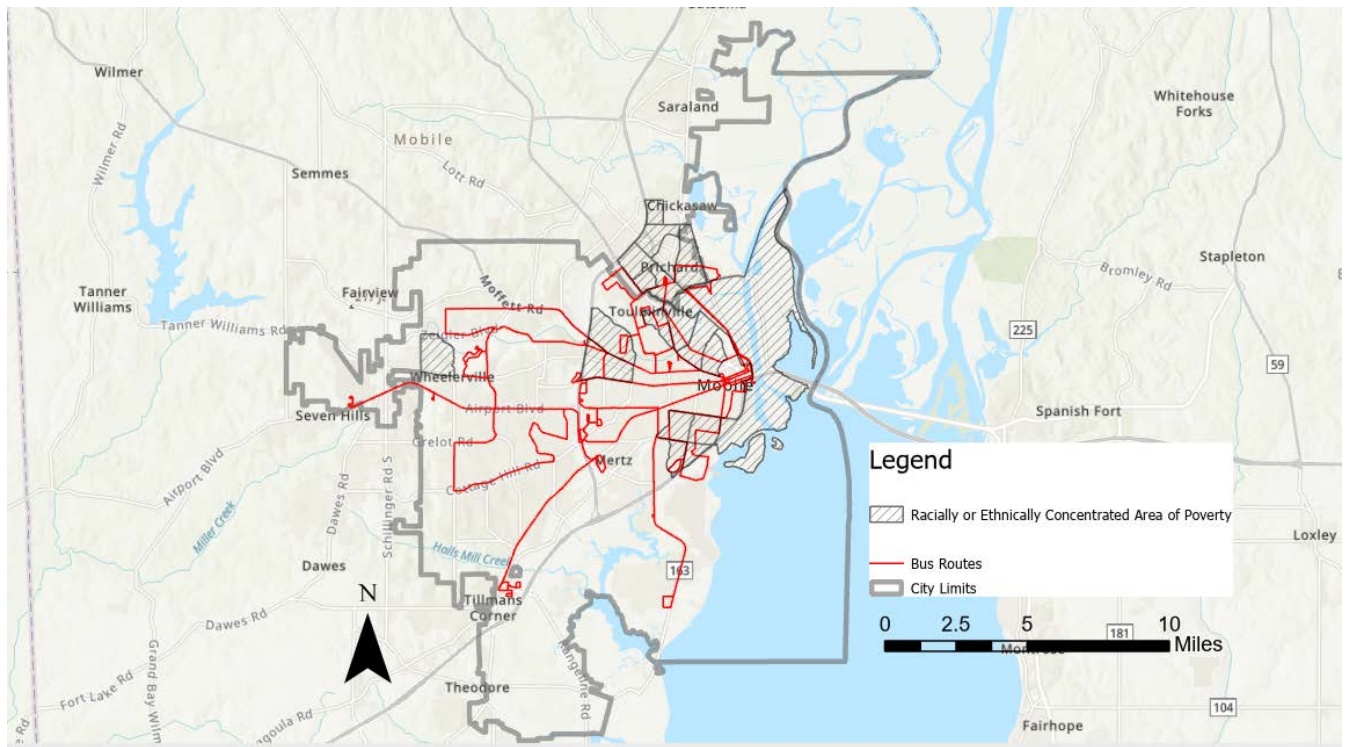


Figure 3: Map of Bus Routes and R/ECAPs

Data Source: Mobile GIS Opensource Data

Are there other strategic opportunities in any of these areas?

The City of Mobile is in plans to contribute \$30 million to a \$252 million effort to build a new, five gate commercial airport close to downtown near many of the R/ECAPs. The development will move their airport from the West Mobile location to the Brookley Aeroplex location in the southeast area of the city. The new airport will meet international designation and connect Mobile's businesses to a more international economy.⁴¹ A \$1 billion Airbus expansion connected to the airport should add 1,500 new jobs centrally located near downtown Mobile. At the same time, this airport expansion may also increase pollution and noise near many of the R/ECAPs.

The westernmost R/ECAPs currently lack greenspace and access to community amenities. Brookley by the Bay is planned to be a 98-acre park south of downtown which will provide residents access to the Mobile waterfront, as well as providing ecological restoration and strengthening pedestrian and bike connections between downtown and communities along Dog River⁴².

⁴¹ AL.com (2022). 'Mobile International Airport' can now be part of the conversation. Available at: <https://www.al.com/news/mobile/2022/04/mobile-international-airport-can-now-be-part-of-the-conversation.html>

⁴² <https://www.scapestudio.com/news/2023/02/city-of-mobile-releases-vision-for-brookley-by-the-bay/>

MA-60 Broadband Needs of Housing occupied by Low- and Moderate-Income Households - 91.210(a)(4), 91.310(a)(2)

Describe the need for broadband wiring and connections for households, including low- and moderate-income households and neighborhoods.

The EPA Environmental Justice Screening map of limited broadband coverage below indicates that there are critical gaps when it comes to broadband coverage with many of those critical gaps in Racially and Ethnically Concentrated Areas of Poverty (R/ECAPs). The below map shows that for every R/ECAP in Mobile, at least 20% of households lack internet access.

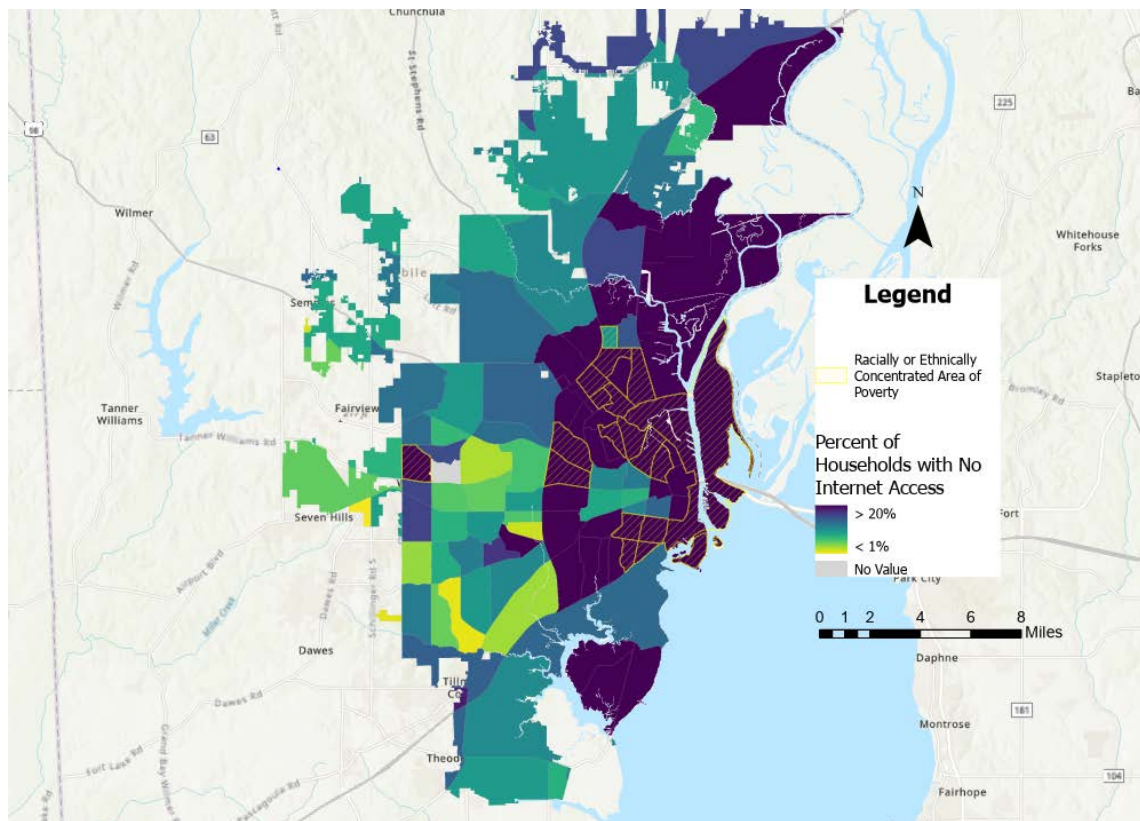


Figure 4: Households with No Internet Access and R/ECAPs

Data Source: ESRI OpenSource Data

Downtown Mobile and East of the Interstate overall have fewer options when considering broadband services, while there are still pockets of limited access West of the City in the suburbs. Most of the R/ECAP census tracts identified in 2010 also only have access to one broadband provider. It is also important to consider the cost of the equipment needed to access the opportunities broadband may bring. Despite some areas having access to multiple broadband providers, there is still need for support in acquiring access to the machines and equipment that broadband functions upon.

Mobile is ahead of the national average and outperforming cities of similar populations in Alabama. Lack of broadband provider competition leaves room for market rigidity – allowing providers to not offer

affordable options for low or moderate-income families. Ultimately, the lack of market options when considering broadband access disproportionately impacts low- and moderate-income households because they often have few financial resources to spend on what may be deemed non-essentials, such as broadband services.

Describe the need for increased competition by having more than one broadband Internet service provider serve the jurisdiction.

The FCC indicates that there are currently at least four providers in the majority of Mobile providing mostly a combination of fixed and mobile broadband including 4G LTE and 5G-NR. Every neighborhood in Mobile has at least one provider. The FCC National Broadband Map also indicates 100 percent fixed broadband and mobile broadband coverage serving the jurisdiction⁴³. At the same time, the map above may indicate that while broadband is available, it might not be affordable or accessible to all households in the City given that a large percentage of neighborhoods that have majority households with limited broadband.

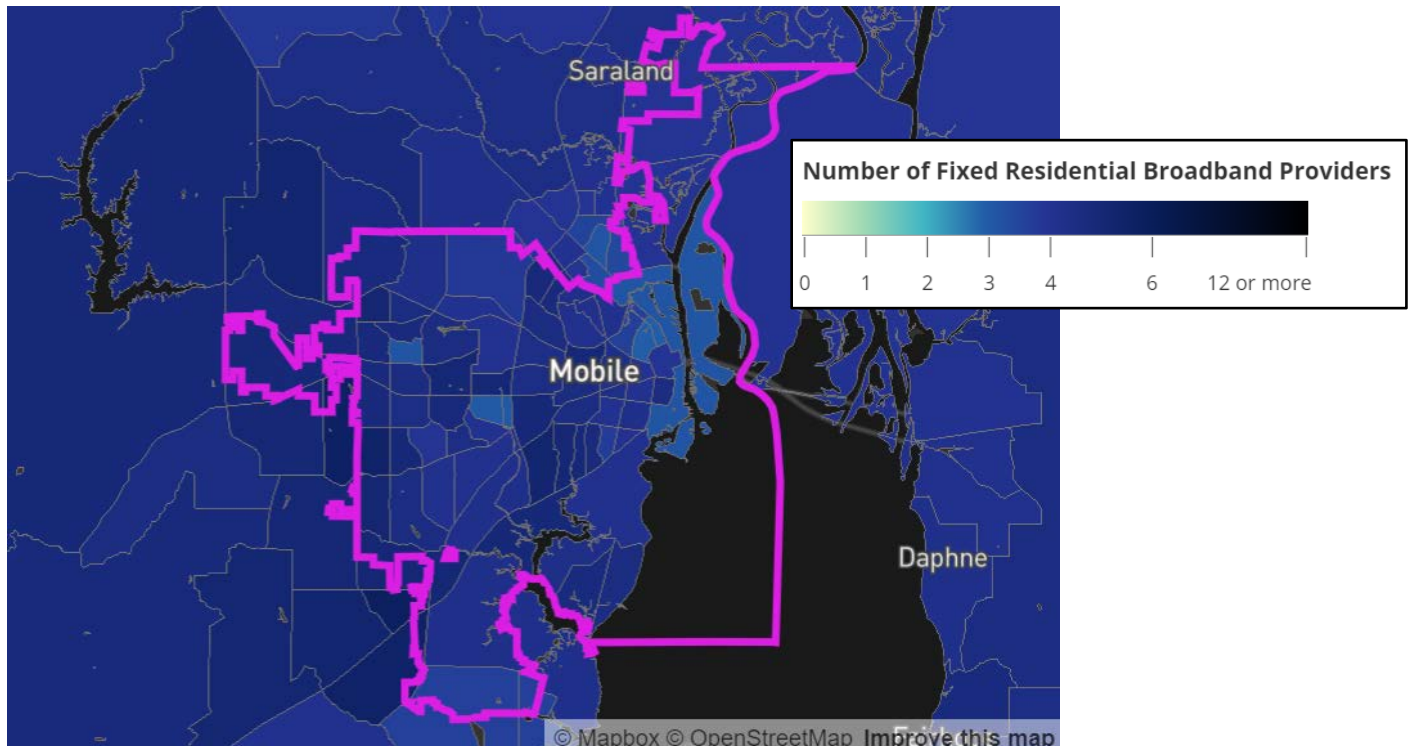


Figure 5: Map of Broadband Providers in Mobile, 2023

Source: https://broadband477map.fcc.gov/#/area-summary?version=jun2021&type=place&geoid=0150000&tech=acfosw&speed=25_3&vlat=30.713238412545323&vlon=-88.1772841420372&vzoom=9.45407238186366

⁴³Federal Communications Commission “Broadband Map”, Downloaded January 2023 and available at: https://broadbandmap.fcc.gov/location-summary/fixed?lon=-88.043054&lat=30.694357&addr_full=Mobile%2C+Alabama%2C+United+States&zoom=10.69&vlon=-88.131499&vlat=30.695103&br=r&speed=25_3&tech=1_2_3_4_5_6_7_8

MA-65 Hazard Mitigation - 91.210(a)(5), 91.310(a)(3)

Describe the jurisdiction's increased natural hazard risks associated with climate change.

The City of Mobile is a coastal city, making it vulnerable to sea level rise and susceptible to extreme weather events, including most recently Hurricanes Sally and Zeta. The U.S. Global Change Research Program has established possible future flood depths in Mobile, AL with rising sea level. The areas that are most likely to be impacted by rising sea levels include several of the most economically vulnerable neighborhoods in Mobile. The majority of low-and moderate-income neighborhoods are near Mobile Bay and a network of waterways that feed into the bay. The map below shows that many of the areas of highest flood risk overlap with Racially and Ethnically Concentrated Areas of Poverty (R/ECAPS).

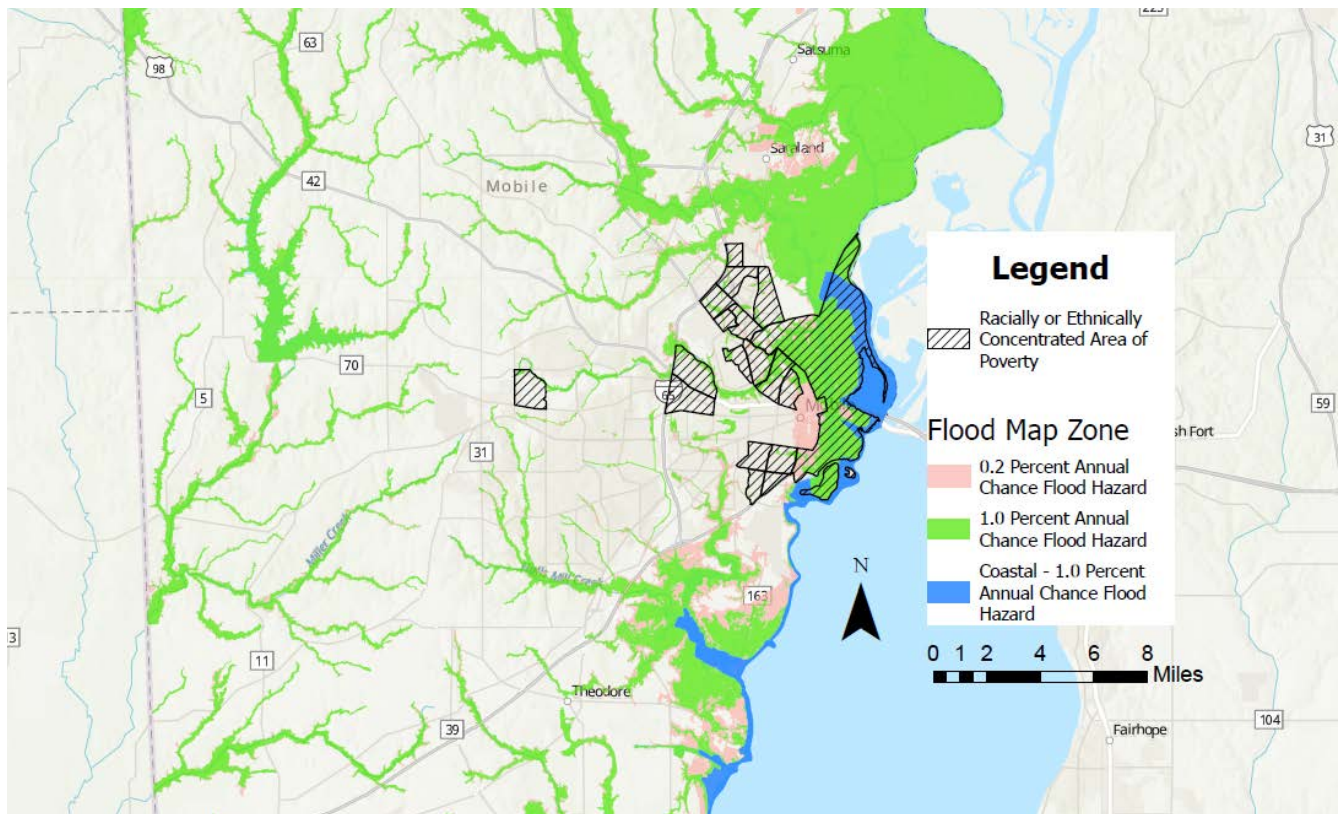


Figure 6: Mobile Floodplain Map

Data Source: Mobile GIS Opensource Data

Describe the vulnerability to these risks of housing occupied by low- and moderate-income households based on an analysis of data, findings, and methods.

As shown in the map above, many of the areas of highest flood risk overlap with R/ECAP tracts. Housing in areas of concentrated poverty may be older and of lower quality than housing in higher income neighborhoods. These neighborhoods are more vulnerable to natural hazards and less able to recover from them. Additionally, housing in low-income neighborhoods is more likely to be overcrowded than housing in higher income neighborhoods. From section NA-10, renters with incomes below 50% AMI are more likely to experience overcrowding than owners and those with incomes above 100% AMI.

Overcrowding in areas of high vulnerability to natural hazards will lead to a greater number of residents potentially impacted.

Low-income populations in low-lying areas are susceptible to sea-level rise and flash flood events. Further, water and sewer lines in Mobile are often impacted during flooding events and can lead to sewage overflow. Other public infrastructure like roadways are often not well maintained in low-income neighborhoods, which creates additional challenges for recovery.

The City of Mobile requires a Flood Zone Development Permit for properties in a flood zone. The City treats the 500-year and 100-year floodplains the same, where permits will only allow a percentage of work to be completed on the house up to 50% of the value over the lifetime of the structure. If the work exceeds 50% of the value of the structure, an Elevation Certificate is required.⁴⁴ This severely limits the ability to complete rehab work when the market value of properties in these areas may be less than \$50,000. Additionally, the cost of elevating a home impacts whether rehab work would be cost reasonable for the City's OOR program.

The City has taken steps to increase housing resilience with its hazard mitigation requirements and recommendations. The City recommends the adoption of a fortified roof for all properties and discourages building in the floodplain. Further, the City requires roofs to be permitted on properties the 500-year and 100-year floodplains.

⁴⁴ City of Mobile. Development Permit Application. Available at:
<https://www.buildmobile.org/uploads/FloodZoneDevelopmentPermit-pn-COMRev1Dec2022.pdf>.

Strategic Plan

SP-05 Overview

Strategic Plan Overview

The Strategic Plan is a five-year plan that is rooted in data and assesses local market conditions, access to affordable housing, blight, and community development needs. Combined with the Needs Assessment, Market Assessment, and Action Plan, the Strategic Plan guides the outcomes of the Consolidated Plan. The Strategic Plan is informed by local needs and priorities identified by the City of Mobile, Mobile Housing Authority, and other stakeholders, and provides goals for the five-year allocations for CDBG, HOME, and ESG funding.

Program Goals

The Community and Housing Development Department developed the 2023-2027 Consolidated Plan based on the following goals for supporting community needs and utilizing Federal grants fund to improve quality of life in Mobile.

- Increase public investment in housing and community development, including public facilities, infrastructure, services.
- Engage private investments in neighborhoods to promote development of decent affordable housing, social services, and economic development.
- Promote revitalization strategies to improve the quality of life in areas that lack public and private investment, services and amenities, have significant deteriorated and abandoned properties, or other indicators of community distress.
- Increase local and regional coordination to improve economic opportunities.

Other Funding Sources

During this Consolidated Plan period, the City of Mobile anticipates additional Federal and State funding that will be leveraged with annual HUD programs.

- *American Rescue Plan Act (ARPA), Treasury Department:* City is receiving \$58 million to be used for community-based programs, including gun violence reduction in LMI areas, housing development and rehabilitation, nonprofit support and down payment assistance, and tourism.
- *CDBG-DR, State of Alabama:* The City of Mobile may receive \$52 million to support housing and infrastructure recovery tied to Hurricanes Sally and Zeta (2020).
- *HOME American Rescue Plan (ARP), HUD:* The City is receiving \$3 million in a special allocation from HUD through the American Rescue Act to support housing needs for individuals and families who are homeless or at-risk of homelessness.

SP-10 Geographic Priorities – 91.215 (a)(1)**Geographic Area****Table 51 - Geographic Priority Areas**

1	Area Name:	Neighborhood Revitalization Strategy Target Area
	Area Type:	Neighborhood Revitalization Strategy Target Area
	Other Target Area Description:	
	HUD Approval Date:	March 2013
	% of Low/ Mod:	
	Revital Type:	
	Other Revital Description:	
	Identify the neighborhood boundaries for this target area.	<p>The NRSA is bounded by Conception Street Road on the north, St. Louis-St. Stephens Road on the south, Three Mile Creek on the west, and N. Conception Street on the east. The area includes the MLK Heritage Redevelopment Area and the entire area lies within the CDBG-Eligible Area.</p> <p>The NRSA includes the following block group GEOIDs 010970002002, 010970004011, 010970004012, 010970004013, 010970004014, 010970004021, 010970005001, and 010970005002. Because the census block groups have changed geographic boundaries, data for the area includes two streets to the South of St. Louis St extending to St. Francis Street ending at N Water St to incorporate the block group boundary.</p>

	Include specific housing and commercial characteristics of this target area.	<p>The City is seeking to extend the Neighborhood Revitalization Strategy Area (NRSA) for the term of this Con Plan. The NRSA Plan was approved by HUD in 2013. The designation offers greater flexibility for the City to target federal resources to the neighborhood. During the FY 2018 -2022 Consolidated Plan period, the City of Mobile targeted CHDO activities in the NRSA.</p> <p>According to the 2017 – 2021 5-Year ACS, the NRSA had 2,525 housing units. The NRSA included a total population of 4,117 people, 88% of whom identify as Black or African American, 9% identify as white, and 1% identify as Hispanic or Latino. The ages of this area were 27.4% children under 18, 24.4% between 18-34, 32.2% between 35-64, and 15.9% over 65. The weighted average household income of the NRSA population was \$33,117. However, it should be noted that there was no data available for the household income of three of the census block groups.</p>
	How did your consultation and citizen participation process help you to identify this neighborhood as a target area?	Stakeholders throughout the AI and Consolidated Plan process identified neighborhoods within the NRSA as those with the highest needs.
	Identify the needs in this target area.	<p>Affordable homeownership and rental housing</p> <p>Slum and Blight Removal</p> <p>Public Facilities and Infrastructure</p> <p>Economic Development</p> <p>Public Services</p> <p>Homelessness</p> <p>Fair Housing and Lending</p> <p>Administration and Planning</p>
	What are the opportunities for improvement in this target area?	To increase affordable housing opportunities for low and moderate-income families and improve quality of life.
	Are there barriers to improvement in this target area?	Lack of funding is a potential problem; however, the City intends to make investments to encourage economic development and revitalization of this area.
2	Area Name:	Citywide
	Area Type:	Local Target Area

	Other Target Area Description:	
	HUD Approval Date:	
	% of Low/ Mod:	
	Revital Type:	Comprehensive
	Other Revital Description:	
	Identify the neighborhood boundaries for this target area.	The City of Mobile boundaries.
	Include specific housing and commercial characteristics of this target area.	There are several areas within the city that have affordable housing, infrastructure improvement, and public service needs.
	How did your consultation and citizen participation process help you to identify this neighborhood as a target area?	Stakeholder and resident input encouraged the City to address citywide affordable housing and other needs.
	Identify the needs in this target area.	Affordable homeownership and rental housing Slum and Blight Removal Public Facilities and Infrastructure Economic Development Public Services Homelessness Fair Housing and Lending Administration and Planning
	What are the opportunities for improvement in this target area?	There are a number of strategic opportunities that the City of Mobile can leverage to increase the impact of community development projects. The City of Mobile is working diligently to carry out its Capital Improvement Plan, which will address infrastructure improvements throughout the city. Additionally, the disaster recovery and HOME-ARP funds will compliment CDBG, HOME and ESG programs to address more housing and infrastructure needs across the city.
	Are there barriers to improvement in this target area?	The primary barrier is funding, but the City will seek opportunities to leverage funding through collaboration with community partners and public agencies.

General Allocation Priorities

Describe the basis for allocating investments geographically within the jurisdiction (or within the EMSA for HOPWA)

Allocation priorities are focused on making strategic investments throughout Mobile. The City of Mobile will target developments throughout the city with a focus on investing in affordable housing, public infrastructure, and public services.

The City is seeking to extend the Neighborhood Revitalization Strategy Area (NRSA) for the term of this Consolidated Plan. The NRSA Plan was approved by HUD in March 2013. The designation offers greater flexibility for the City to target federal resources to the neighborhood. Since designating the NRSA, progress to date has included multiple new houses being constructed, down payment assistance being provided, a focus from the City's Public Safety Department to have close patrol. During the FY 2023-2027 Consolidated Plan period, the City of Mobile plans to continue the City's investment with new housing construction, blight removal, down payment assistance, and public safety focus.

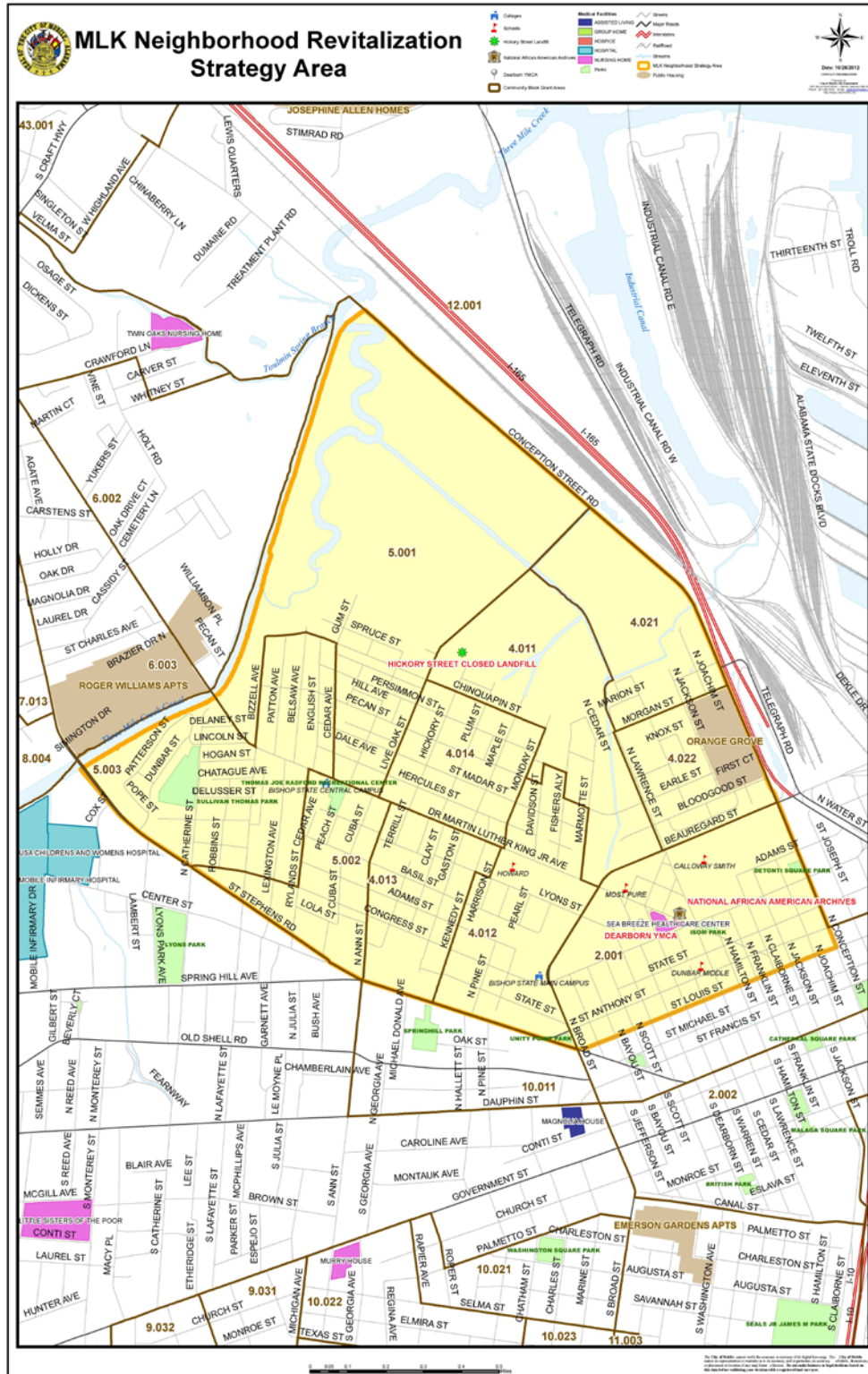


Figure 7: Mobile MLK NRSA Map

Data Source: City of Mobile

SP-25 Priority Needs - 91.215(a)(2)**Priority Needs****Table 52 – Priority Needs Summary**

1	Priority Need Name	Affordable housing
	Priority Level	High
	Population	Extremely Low Low Moderate Elderly Public Housing Residents
	Geographic Areas Affected	City-wide NRSA
	Associated Goals	Increase Affordable Housing Opportunities
	Description	Affordable housing includes, but is not limited to, publicly supported housing, private developments with grant or tax investments, rental payment assistance, and/or homeowner down payment assistance. Each category of publicly supported housing often serves different income-eligible populations at different levels of affordability. The location of affordable housing can limit fair housing choice, especially if the housing is located in segregated areas, R/ECAPs, or areas that lack access to opportunity. The type of housing (whether the housing primarily serves families with children, elderly persons, or persons with disabilities) can also limit housing choice, especially if certain types of affordable housing are located in segregated areas, R/ECAPs, or areas that lack access to opportunity, while other types of affordable housing are not. The provision of affordable housing is often important to individuals with protected characteristics because they are disproportionately represented among those that would benefit from low-cost housing.

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	Basis for Relative Priority	Affordable housing units are primarily available in R/ECAP and segregated areas of the city with less access to opportunities. Existing public housing units, which are primarily located in these areas are in need of major renovations and improvements. Stakeholders noted the need for additional affordable housing options for low-income residents.
2	Priority Need Name	Economic Development
	Priority Level	High
	Population	Extremely Low Low Moderate Public Housing Residents Non-housing Community Development
	Geographic Areas Affected	City-wide
	Associated Goals	Promote Economic Development Increase Affordable Housing Opportunities
	Description	The geographic relationship of job centers and large employers to housing, and the linkages between the two (including public transportation) are important components of fair housing choice. Workforce development and small business development efforts should include consideration of the type of jobs available, variety of jobs available, job training opportunities, benefits and other key aspects that affect job access.
	Basis for Relative Priority	Access to jobs and job centers is difficult for residents living in most R/ECAPs. Two of the largest job centers are in western Mobile, which is difficult to access for many Mobile residents.
3	Priority Need Name	Public Services
	Priority Level	High

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Population	Extremely Low Low Moderate Elderly Persons with Mental Disabilities Persons with Physical Disabilities Persons with Developmental Disabilities Persons with Alcohol or Other Addictions Persons with HIV/AIDS and their Families Non-housing Community Development
Geographic Areas Affected	City-wide
Associated Goals	Provide Public Services
Description	Public Services refers to supportive services available for targeted populations, such as elderly, individuals with mental illnesses, cognitive or developmental disabilities, and/or physical disabilities in their own home or community (as opposed to in institutional settings). Public services include transportation, in-home meal service, integrated adult day services and other services (including, but not limited to, medical, social, education, transportation, housing, nutritional, therapeutic, behavioral, psychiatric, nursing, personal care, and respite). Public entities must provide services to individuals with disabilities in community settings rather than institutions when: 1) such services are appropriate to the needs of the individual; 2) the affected persons do not oppose community-based treatment; and 3) community-based services can be reasonably accommodated, taking into account the resources available to the public entity and the needs of others who are receiving disability-related services from the entity. Assessing the cost and availability of these services is also an important consideration, including the role of state Medicaid agencies. The outreach of government entities around the availability of community supports may impact these individuals' knowledge of such supports and their ability to participate in programs.

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	Basis for Relative Priority	Affordable options for in-home or community-based supportive services are available throughout Mobile. However, many elderly and persons with disabilities are very low income and cannot afford even a modest fee.
4	Priority Need Name	Public Facilities and Infrastructure
	Priority Level	High
	Population	Extremely Low Low Moderate Elderly Persons with Mental Disabilities Persons with Physical Disabilities Persons with Developmental Disabilities Persons with Alcohol or Other Addictions Persons with HIV/AIDS and their Families Non-housing Community Development
	Geographic Areas Affected	City-wide
	Associated Goals	Invest in Public Facilities

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	Description	Many public buildings, sidewalks, pedestrian crossings, or other infrastructure components are inaccessible to individuals with disabilities including persons with physical mobility impairments, individuals who are deaf or hard of hearing, and persons who are blind or have low vision. These accessibility issues can limit realistic housing choice for individuals with disabilities. Inaccessibility is often manifest by the lack of curb cuts, lack of ramps, and the lack of audible pedestrian signals. While the Americans with Disabilities Act and related civil rights laws establish accessibility requirements for infrastructure, these laws do not apply everywhere and/or may be inadequately enforced. Additionally, poorly maintained public buildings, sidewalks, or other infrastructure components can lead to unsafe conditions within a neighborhood for residents to navigate.
	Basis for Relative Priority	Many of the buildings in Mobile are historic and/or were built before accommodations for persons with disabilities were common. Streets and sidewalks in low-income neighborhoods have not been properly maintained. This poses a challenge for those accessing services and looking to buy homes in the city.
5	Priority Need Name	Homelessness
	Priority Level	High
	Population	Chronic Homelessness Individuals Families with Children Mentally Ill Chronic Substance Abuse Veterans Persons with HIV/AIDS Victims of Domestic Violence Unaccompanied Youth
	Geographic Areas Affected	City-wide
	Associated Goals	Provide support and services to homeless

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	Description	Primary drivers of homelessness in Mobile are stagnation/decreasing wages combined with a lack of affordable housing options. Without a high functioning transit system, these two problems are siloed and exacerbated, resulting in higher pressure on organizations and facilities providing services for homeless and chronically homeless individuals and families.
	Basis for Relative Priority	In the 2022 HUD CoC AI-501 Mobile City & County/Baldwin County CoC Point-in-Time Count from 1/24/2022, volunteers counted 585 homeless individuals of which 38% were within families, and 12.9% were chronically homeless. These figures provide some insight into the homeless population in Mobile, however they do not reflect those persons that are doubling up in housing or sleeping on couches (overcrowding).
6	Priority Need Name	Slum and Blight
	Priority Level	High
	Population	Extremely Low Low Moderate Middle Public Housing Residents Non-housing Community Development
	Geographic Areas Affected	City-wide
	Associated Goals	Address deteriorated and abandoned properties Increase Affordable Housing Opportunities

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	Description	Slum and blight refers to residential and commercial properties unoccupied by an owner or a tenant, which are in disrepair, unsafe, or in arrears on real property taxes. Deteriorated and abandoned properties may be signs of a community's distress and disinvestment and are often associated with crime, increased risk to health and welfare, decreasing property values, and municipal costs. The presence of multiple unused or abandoned properties in a particular neighborhood may have resulted from mortgage or property tax foreclosures. The presence of such properties can raise serious health and safety concerns and may also affect the ability of homeowners with protected characteristics to access opportunity through the accumulation of home equity. Demolition without strategic revitalization and investment can result in further deterioration of already damaged neighborhoods.
	Basis for Relative Priority	The identified R/ECAPs in Mobile are areas in which there is a high rate of blight and abandonment. The City conducts an annual survey on blighted properties to track and prioritize unsafe and abandoned properties needing to be addressed.
7	Priority Need Name	Administration and Planning
	Priority Level	High
	Population	City of Mobile
	Geographic Areas Affected	City-wide
	Associated Goals	Manage funds effectively and efficiently
	Description	Administration and planning costs are necessary to support expenses related to administrative and programmatic activities that include, but not limited to financial transactions, contract development, staff time administering programs; compliance and monitoring of subrecipients, vendors, other recipients of funding; and other costs specified as eligible administrative expenses in 2 CFR Part 200.
	Basis for Relative Priority	2 CFR Part 200

Narrative (Optional)

SP-30 Influence of Market Conditions – 91.215 (b)**Influence of Market Conditions**

Affordable Housing Type	Market Characteristics that will influence the use of funds available for housing type
Tenant Based Rental Assistance (TBRA)	Market characteristics suggest there is a need for high-quality affordable housing units in Mobile. According to HUD, 46.8% of households in Mobile are below 80% of the HUD Area Median Family Income, and 16.5% of this population is very-low-income (<30% HAMFI). Very-low-income renter households are most likely to live in substandard housing and face a housing cost burden greater than 50% of income. As the Mobile Housing Authority reduces public housing units, access to affordable rental units will continue to be limited. Currently, the Mobile Housing Board has a waiting list of 3,426 for public housing units and vouchers.
TBRA for Non-Homeless Special Needs	Similar to the need for Tenant Based Rental Assistance, the market analysis suggests there is a need for high-quality affordable rental units for residents with special needs that provide needed accommodations. In addition to finding a safe and affordable place to live, these households are also in need of access to transit and supportive services.
New Unit Production	Market conditions indicate the need for new rental and ownership units in a variety of sizes and levels of affordability. There are 16,630 renter households and 7,500 owner households that have one or more of four housing problems, including overcrowding, substandard, and housing cost burden. Cost burden is the most common housing problem for households earning less than 100%. However, other conditions provide insight into the types of housing needed. Crowding is most prevalent in single family households, denoting the need for larger affordable units. Additionally, increases in housing prices and interest rates are a challenge to funding housing development and down payment assistance that is affordable to low-income households. The zoning codes within Mobile, while updated, still present challenges in the process to change zoning from single-unit to multifamily housing units where the lot would allow.

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Rehabilitation	The age and condition of housing stock in Mobile continues to require a need for rehabilitation activities. The majority of housing stock is over 30 years old. According to the 2017-2021 CHAS data, 70% of owner-occupied housing and 59% of renter-occupied housing was built before 1980. As noted above, cost burden is the most common housing problem, indicating that many homeowners do not have additional funds to adequately maintain and repair their properties. Elderly owner households are 46.8% of owner households with severe cost burden and are likely to face additional challenges securing resources to make units accessible and complete regular maintenance.
Acquisition, including preservation	Owned property in Mobile that is not provided for in an estate plan or will is automatically divided among all heirs. This type of inheritance is known as “heir property”. This often results in properties having multiple owners and the City or interested developers not being able to “clear” the title by getting approval from all owners to invest in the property.

Table 53 – Influence of Market Conditions

SP-35 Anticipated Resources - 91.215(a)(4), 91.220(c)(1,2)

Introduction

The Community and Housing Development Department anticipates receiving \$2,355,380 in CDBG funds, \$976,211 in HOME funds, and \$209,600 in ESG funds for the 2023 program year. The City of Mobile anticipates that it will receive \$1,334,806 in CDBG program income (PI) and \$17,296 in HOME program income (PI) for FY 2023. The City's FY 2023-2024 program year starts on May 1, 2023 and ends on April 30, 2024. The City projects the annual allocations for the remaining four years of the Consolidated Plan will be as follows: CDBG (\$9,421,520), HOME (\$3,904,844), and ESG (\$838,400). In addition, program income for CDBG and HOME is also projected to remain consistent during this Consolidated Plan period. The accomplishments of these projects/activities will be reported in the FY 2023, FY 2024, FY 2025, FY 2026, and FY 2027 Consolidated Annual Performance and Evaluation Reports (CAPERs).

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	Affordable Housing Infrastructure	2,355,380	\$1,334,806	0	\$3,690,186	9,421,520	The City of Mobile uses CDBG funds to develop and renovate affordable housing, remove blight, and provide services to youth, the elderly and persons with disabilities.
HOME	public - federal	Affordable Housing Administration & Planning	976,211	\$17,296	0	\$993,507	3,904,844	The City of Mobile uses HOME funds to provide financial assistance to first time homebuyers and develop affordable housing units
ESG	public - federal	Homeless Prevention Administration & Planning	209,600			\$209,600	838,400	The City of Mobile provides local homeless service providers with funds to perform outreach, provide shelter, and prevent homelessness.

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CDBG-DR	public - federal	Affordable Housing Infrastructure Economic Development Administration & Planning	0	0	0	52,343,749	52,343,749	The City of Mobile will receive CDBG-DR funding from the state of Alabama to support recovery from Hurricanes Sally and Zeta in infrastructure, economic development, and affordable housing.
HOME-ARP	public - federal	Affordable Housing Administration & Planning	0	0	0	3,083,624	3,083,624	The City of Mobile will receive HOME-ARP funding to support housing development for HOME-ARP qualifying populations.

Table 54 - Anticipated Resources

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

The Community and Housing Development Department anticipates additional Federal and State funding that will be leveraged with annual HUD programs. Leverage and match sources will be identified on a project by project basis, where required for HOME and ESG programs.

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

The Mobile Neighborhood Renewal Program continues to identify blighted and vacant properties that are eligible for the program which clears the title on abandoned and tax delinquent properties. The goal of the program is to either stabilize the property or put it back into commerce, depending on market conditions. Working with local developers, the City will leverage these properties to improve market conditions and housing stock.

Discussion

The City plans to program federal, states and local funds to serve the community and meet needs of low-income households and individuals throughout the jurisdiction. During the period of this Consolidate Plan, the City anticipates receiving additional funds from HUD and the State of Alabama for the purposes of disaster recovery (CDBG-DR \$52,343,749), homelessness and housing assistance (HOME-ARP \$3,083,624), and economic development and revitalization (Economic Development Initiative \$50,000,000). Each of these allocations will support the City's efforts to further developments of affordable housing and providing economic opportunities throughout Mobile.

SP-40 Institutional Delivery Structure – 91.215(k)

Explain the institutional structure through which the jurisdiction will carry out its consolidated plan including private industry, non-profit organizations, and public institutions.

Responsible Entity	Responsible Entity Type	Role	Geographic Area Served
City of Mobile	Government	Planning	Jurisdiction
Mobile Housing Authority	PHA	Public Housing	Jurisdiction
City and County of Mobile and Baldwin County Continuum of Care	Continuum of Care	Planning	Region

Table 55 - Institutional Delivery Structure

Assessment of Strengths and Gaps in the Institutional Delivery System

Throughout the Analysis of Impediments of Fair Housing and Consolidated Plan process, stakeholders identified the strength and dedication of the local community development practitioners. Many noted the importance of strong working relationships and the willingness of community leaders to work together to tackle big community development issues. The success of local economic development efforts to attract new jobs was also a common answer among respondents. Overall, there was a level of optimism surrounding the ability to attract companies such as Airbus, Walmart, and Amazon.

While stakeholders identified the leadership of the community development committee as an asset, many felt that bringing leaders together from various organizations was a challenge. As federal and local funding continues to fluctuate, stakeholders stressed the need to provide coordinated services to continue to serve community members.

Stakeholders also identified a disconnect between service providers and community members in need. The development patterns of the city are also reflected in the location of service providers. As development moved west of Highway 65, many service providers were able to find affordable office space near amenities. Lack of public transportation has created a gap between service providers west of Highway 65 and community members in need of services located east of Highway 65.

In addition to the lack of direct funding, affordable housing developers identified challenges in accessing sustainable financing, market challenges, and restrictive zoning policies. Community opposition to development was another challenge affordable housing developers consistently face across the city.

To bring community development organizations together and improve coordination, the City of Mobile has set goals through the AFH process. The Community and Housing Development Department will engage city and regional stakeholders and government agencies to review fair housing needs.

Availability of services targeted to homeless persons and persons with HIV and mainstream services

Homelessness Prevention Services	Available in the Community	Targeted to Homeless	Targeted to People with HIV
Homelessness Prevention Services			
Counseling/Advocacy	X	X	X
Legal Assistance	X	X	X
Mortgage Assistance	X	X	X
Rental Assistance	X	X	X
Utilities Assistance	X	X	
Street Outreach Services			
Law Enforcement	X	X	
Mobile Clinics			
Other Street Outreach Services	X	X	X
Supportive Services			
Alcohol & Drug Abuse	X	X	X
Child Care	X	X	X
Education	X	X	X
Employment and Employment Training	X	X	X
Healthcare	X	X	X
HIV/AIDS	X	X	X
Life Skills	X	X	X
Mental Health Counseling	X	X	X
Transportation	X	X	X
Other			
Other			

Table 56 - Homeless Prevention Services Summary

Describe how the service delivery system including, but not limited to, the services listed above meet the needs of homeless persons (particularly chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth)

The City of Mobile is a participating jurisdiction in the HUD-designated City and County of Mobile and Baldwin County Continuum of Care (CoC). Housing First, Inc., the lead organization, submits an annual application for HUD McKinney-Vento Homeless Assistance Acts programs on behalf of the three jurisdictions. Housing First, Inc. provides homelessness assistance in three main service areas: Community Housing, Homeless Prevention, and Homeless Management Information System (HMIS). The Community Housing Program provides Permanent Supportive Housing to individuals and families in Mobile who are experiencing homelessness and who have a disabling condition. This program assists participants in transitioning from homelessness to being housed and encourages clients to

become self-sufficient through a variety of supportive services. The Community Housing Program is a “scattered site” program. The program leases individual apartment units in the community to place individuals or family participants. Small monthly rental fees are charged based upon income. Housing First provides case management throughout these services.

Housing First’s Homeless Prevention Department aids individuals and families who are experiencing homelessness or at imminent risk of homelessness. Three federal grants are used to carry out this work: Supportive Services for Veteran Families (SSVF), Emergency Solutions Grant (ESG) and the Continuum of Care (CoC) funds. The ESG program provides short-term and medium-term assistance to rapidly re-house homeless and prevent homelessness. The CoC program funds the Family Solutions Grant and Family Youth Solutions Grant, which are dedicated to assisting families and unaccompanied youth obtain stable permanent housing by providing temporary rental assistance.

Housing First, Inc. also administers the HMIS. HMIS is the system designated for HUD’s data collection, management, and reporting standards. It is used to collect client-level data and data on housing and services provided.

Describe the strengths and gaps of the service delivery system for special needs population and persons experiencing homelessness, including, but not limited to, the services listed above

The Continuum of Care (CoC), with Housing First Inc. as the lead agency, coordinates efforts to eliminate homelessness in collaboration with community-based partners. The CoC works closely with local and regional government, including the City of Mobile and Mobile County, service providers, religious entities, and other community partners to provide supportive services to the homeless population.

In addition to the lack of funding for services, many of the overarching community development issues in Mobile are obstacles to eliminating homelessness in the community. There is a lack of access to affordable housing, transportation, and healthcare for low- and moderate-income residents of Mobile, making households vulnerable to becoming homeless. Additionally, those that are homeless or at risk of becoming homeless have a wide variety of needs, making it difficult to provide all of the services households may need to become stable and find housing and/or employment.

Provide a summary of the strategy for overcoming gaps in the institutional structure and service delivery system for carrying out a strategy to address priority needs

- Decentralizing the CoC system from one provider and encouraging other providers to join the CoC as active members.
- Improve public transportation system.
- Develop more affordable housing and target more units to persons and households at 0 to 50% of AMI.
- Develop and expand partnerships with affordable housing providers and developers
- Expand employment and job training opportunities for the homeless population.

- Provide health care services to the homeless, including healthy eating education and wellness programs.
- Identify at-risk persons and households (low-income persons, unemployed, victims of domestic violence, people with mental illness and disabilities) and make appropriate referrals.
- Provide life skills training, literacy training, tutorials, and parenting training to homeless families.
- Reduce the instances of blighted property through rehabilitation, demolition, and/or redevelopment.

SP-45 Goals Summary – 91.215(a)(4)**Goals Summary Information**

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
1	Increase Affordable Housing Opportunities	2023	2027	Affordable Housing Non-Homeless Special Needs	City-wide	Affordable Housing	CDBG: \$4,600,000 HOME: \$4,384,305 CDBG-DR: \$23,200,090	Rental units constructed: 112 Household Housing Unit Rental units rehabilitated: 25 Household Housing Unit Homeowner Housing Added: 25 Household Housing Unit Homeowner Housing Rehabilitated: 365 Household Housing Unit Direct Financial Assistance to Homebuyers: 125 Households Assisted Other: 6 Other
2	Address deteriorated and abandoned properties	2023	2027	Affordable Housing Non-Housing Community Development	City-wide	Slum and Blight Removal	CDBG: \$2,250,000	Low/Moderate Income Households Benefited: 35 Households

2023-2027 Consolidated Plan

3	Invest in Public Facilities and Infrastructure	2023	2027	Affordable Housing Non-Homeless Special Needs Non-Housing Community Development Economic Development	City-wide	Public Facilities and infrastructure	CDBG: \$300,000 CDBG-DR: \$29,143,659	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 1500 Persons Assisted
4	Promote Economic Development	2023	2027	Affordable Housing Homeless Non-Homeless Special Needs Non-Housing Community Development Economic Development	City-wide	Economic Development	CDBG: \$524,900	Businesses assisted: 25 Businesses Assisted Other: 2 Other
5	Support for Public Services	2023	2027	Affordable Housing Homeless Non-Homeless Special Needs Non-Housing Community Development Economic Development	City-wide	Public Services	CDBG: \$1,702,000	Public service activities other than Low/Moderate Income Housing Benefit: 6500 Persons Assisted

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6	Provide support and services to Homeless	2023	2027	Homeless	City-wide	Homelessness	ESG: \$1,048,000	Tenant-based rental assistance / Rapid Rehousing: 250 Households Assisted Homeless Person Overnight Shelter: 1375 Persons Assisted Homelessness Prevention: 1875 Persons Assisted
7	Access to Opportunities	2023	2027	Affordable Housing Non-Homeless Special Needs Non-Housing Community Development Economic Development	City-wide	Economic Development	CDBG: \$250,000	Other: 2 Other
8	Administration	2023	2027	Administration, Planning, and Management Priority	City-wide	Administration and Planning	CDBG: \$2,250,000 HOME: \$496,750 ESG: \$77,000	Other: 1 Other

Table 57 – Goals Summary

Goal Descriptions

1	Goal Name	Increase Affordable Housing Opportunities
	Goal Description	Provide more housing in the City, including in areas of high opportunity and reduce barriers to affordable housing. Potential activities include supporting and funding affordable development and rehab in the City, including in high opportunity areas and track affordable housing developments to inform planning efforts.
2	Goal Name	Address deteriorated and abandoned properties
	Goal Description	Eliminate blighting influences and the deterioration of property and facilities. Potential activities include programmatic opportunities to invest in historic properties, analyze underutilized and vacant city-owned land for affordable housing development opportunities, increase coordination with fair housing and community development activities.
3	Goal Name	Invest in Public Facilities and Infrastructure
	Goal Description	Improve the safety and livability of neighborhoods. Support improvements to neighborhoods, community assets and facilities to reduce neighborhood disparities, improve access to transit, and provide safe community spaces.
4	Goal Name	Promote Economic Development
	Goal Description	Provide greater access to education, workforce, and business opportunities. Potential activities include workforce development and job training, continue partnerships with community colleges and employers, and target Section 3 and women and minority-owned businesses for City contracts.
5	Goal Name	Support for Public Services
	Goal Description	Address non-housing community development needs by supporting community-based public service programs, including, but not limited to programs for employment, public safety, child care, health, drug abuse, education, emergency food assistance, fair housing counseling, energy conservation, welfare (but excluding the provision of income payments identified under 570.207(b)(4)), homebuyer down payment assistance, rental assistance, or recreational needs.
6	Goal Name	Provide support and services to Homeless
	Goal Description	Assist persons who are homeless or at risk of being homeless by providing housing, housing assistance, and/or client centered services.

7	Goal Name	Access to Opportunities
	Goal Description	Reduce disparities in access to opportunities and increase community engagement related to fair housing awareness and planning in conjunction with the Legal Services of Alabama and/or Center for Fair Housing. Planned activities may include participating in fair housing month, community development week and actively encouraging community planning activities.
8	Goal Name	Administration
	Goal Description	Provide program management and oversight for the successful administration of federal, state, and local funded programs.

Estimate the number of extremely low-income, low-income, and moderate-income families to whom the jurisdiction will provide affordable housing as defined by HOME 91.315(b)(2)

The City estimates it will provide affordable housing to the approximate number of extremely low-income, low-income, and moderate-income families:

- 70 low and moderate-income households through the rehabilitation of owner-occupied homes and tenant-occupied rental property with CDBG funds
- 25 moderate-income households through the provision of down payment and closing cost assistance for eligible homebuyers with HOME funds
- 4 low-income households through new or rehabilitated HOME-assisted units
- 10 extremely low-income households through the provision of ESG rental assistance
- 600 extremely low-income individuals and households through the provision of overnight shelter through an ESG-assisted homeless facility

Additional low-income area benefits will be determined as annual projects are identified.

SP-50 Public Housing Accessibility and Involvement – 91.215(c)

Need to Increase the Number of Accessible Units (if Required by a Section 504 Voluntary Compliance Agreement)

MHA is maintaining the terms of its Voluntary Compliance Agreement and is working with FHEO to continue inspections and certification of units, per the MHA 2023 Annual Action Plan⁴⁵.

Activities to Increase Resident Involvements

MHA works with the Resident Advisory Board to identify opportunities to address resident needs and concerns, and work to improve quality of life for public housing residents.

Is the public housing agency designated as troubled under 24 CFR part 902?

Yes, Mobile Housing Authority is designated as Troubled.

Plan to remove the ‘troubled’ designation

MHA entered into a Recovery Agreement with HUD in January 2021 and outlined a strategy to improve units and tenant involvement. MHA seeks to rehabilitate current properties by converting to the RAD program and partner with other affordable rental development funding sources to increase affordable housing throughout Mobile.

⁴⁵ Mobile Housing Authority 2023 Annual Action Plan https://www.mobilehousing.org/files/2022-08-22-2023_Annual_Plan-Public_Review.pdf

SP-55 Barriers to affordable housing – 91.215(h)

Barriers to Affordable Housing

Barriers to affordable housing were identified throughout the Analysis of Impediments and Consolidated Plan Process.

Local Government Funding: While the City of Mobile has provided general funds to support infrastructure development, State law prevents the City from making general funds available for housing grants and loans.

Tax Delinquent property: The process for obtaining clear and marketable titles to tax delinquent properties has improved as the City and State have moved forward with policy reforms. However, the prevalence of their properties and resources needed to clear these titles limits the City's ability to move these properties through the process quickly and efficiently. As a result, too many tax delinquent properties that could be redeveloped for affordable housing sit vacant and serve as blight on the neighborhoods. Further, the issue has been complicated by multiple County Revenue officials pursuing a different process for the way to capture real estate tax revenue. This has caused some State legislation to cause issues with the City's ability to access these properties.

Zoning and Land Use: Current zoning strongly favors single family housing development, coupled with community opposition to multifamily development, this poses challenges for building multi-family developments across the city, but especially in neighborhoods of opportunity. Zoning regulations too often impose standards for site development that increase the cost of housing. This is particularly true, and unnecessary, in older inner-city neighborhoods where lots have been historically smaller and housing patterns more dense. The connotation that smaller lots and more densely populated neighborhoods is bad, along with certain zoning regulations, has hampered revitalization in some neighborhoods.

Lack of Public Investments: The City is currently working to address infrastructure needs across the city, however, the need exceeds the amount of resources available. Areas around public housing developments need additional access to resources and funding for revitalization, the housing stock is out of date and in need of capital improvements.

Lack of Regional Cooperation: There is a need for additional coordination between local and regional government service providers to efficiently use limited resources.

Limited Access to Opportunity: Interstate 65 divides the City of Mobile, with many segregated low-income communities east of I-65 and many growth areas west of I-65, fostering disparities in access to jobs, affordable transportation and educational opportunities.

Strategy to Remove or Ameliorate the Barriers to Affordable Housing

The City of Mobile's Analysis of Impediments outlines strategies to address issues of fair housing, which directly impact access to affordable housing. The following is an overview of cross cutting strategies.

Increase coordination with City Departments and City/Regional Entities

Working with the Mobile Housing Board, school district and other agencies the Community and Housing Development Department will conduct an analysis of vacant or underutilized publicly owned properties that may be used for affordable housing and community development activities. In addition, the Department will develop a strategy for incorporating affordable housing into historic districts and other communities of opportunity.

Provide more housing in areas of high opportunity and reduce barriers to affordable housing

There is a need for quality, affordable housing throughout the city. The City should preserve existing affordable housing developments in neighborhoods that are at risk of displacement or gentrification. In addition, the City should support and pursue affordable housing development in high opportunity areas.

Reduce disparities in access to opportunities

Interstate 65 divides the City of Mobile, with many segregated low-income communities east of I-65 and many growth areas west of I-65, the City will continue to target investments to increase resources east of I-65 and support the development of affordable housing west of I-65.

Increase fair housing capacity

The City of Mobile will expand awareness of fair housing needs and rights among stakeholder organizations and the community overall. This will include providing technical assistance and capacity building to area nonprofit organizations and the Center for Fair Housing to expand fair housing training and awareness.

SP-60 Homelessness Strategy – 91.215(d)

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

The City of Mobile coordinates with the Continuum of Care for Mobile County and Baldwin County and provides services providers with funding through the Emergency Solutions Grant (ESG) to assist homeless persons, including unsheltered persons. Housing First, Inc., the Lead Agency in Mobile, funds service providers, provides direct services, and manages the Homeless Management Information System for the CoC. The Coordinated Entry staff are regularly on site at local food pantries and at meal service locations to engage new households and provide awareness of the coordinated entry system. A dedicated field Intake Specialist is tasked with outreaching to and serving street homeless individuals throughout the service area. They also regularly visit known encampments and other locations where individuals less likely to utilize formal supports may be found.

In addition to outreach conducted by the Coordinated Entry staff, the community has expanded efforts to expand awareness of homelessness in the region. In partnership with City of Mobile, the CoC, service providers, private citizens, and businesses participated in a Homeless Summit to raise awareness, connect organizations and provide outreach resources. These efforts expand the network for individuals and organizations to seek assistance for homeless persons.

Addressing the emergency and transitional housing needs of homeless persons

The City of Mobile will continue to allocate funds to service providers to provide emergency and transitional housing services to homeless persons through ESG funding.

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 Mobile will continue to allocate funds to service providers that provide shelter and services for women with children, families with children and women and children who have escaped domestic violence situations through ESG funding. The city is also partnering with housing developers to increase the affordable housing stock in Mobile to provide more opportunities for adequate, affordable, permanent housing for at-risk individuals and families.

Help low-income individuals and families avoid becoming homeless, especially extremely low-income individuals and families who are likely to become homeless after being discharged from a publicly funded institution or system of care, or who are receiving

assistance from public and private agencies that address housing, health, social services, employment, education or youth needs.

The City of Mobile will continue to allocate funding to service providers that provide resources to individuals and families who may become homeless including workforce development programs, educational programs for youth, services for seniors, and legal services. In addition to funding through CDBG and ESG, the Continuum of Care has dedicated resources to provide services to ex-offenders and persons with disabilities.

SP-65 Lead based paint Hazards – 91.215(i)

Actions to address LBP hazards and increase access to housing without LBP hazards.

The City of Mobile is working to address blight and rehabilitate housing in areas of the city with older housing stock, including the CDBG target areas. When undertaking demolition and rehabilitation activities, projects are managed by contractors and non-profit staff that are certified in lead safe work practices.

How are the actions listed above related to the extent of lead poisoning and hazards?

Limited funding for lead abatement activities and outreach poses a challenge for the City to fully address lead poisoning. However, both the City of Mobile and the Mobile Housing Authority will continue to remediate lead hazards through demolition and rehabilitation of units throughout the city.

How are the actions listed above integrated into housing policies and procedures?

The City's lead-based hazard program is integrated into the City's HOME Manual and homeowner rehabilitation program under the CDBG Rehab Policies. State certified and licensed lead contractors are awarded the contract through a competitive bid process to do the lead work for the homeowner home improvement program.

SP-70 Anti-Poverty Strategy – 91.215(j)

Jurisdiction Goals, Programs and Policies for reducing the number of Poverty-Level Families

The City of Mobile continues to support economic development by investing in infrastructure through the Capital Improvement Plan, building capacity of local businesses through the Office of Supplier Diversity, and engaging in major planning efforts, including Map for Mobile, and providing inputs on updated zoning codes and hazard mitigation planning. The City also supports efforts of local and regional partners and economic development partners such as the Mobile Area Chamber of Commerce, Alabama Department of Economic and Community Affairs, Economic Development Partnership of Alabama, Port of Mobile, Mobile Aeroplex at Brookley, Alabama Power Company, Mobile Gas, and the University of South Alabama.

Goals for the 2023-2027 Consolidated Plan include reducing disparities in access to opportunities and economic development activities. The City will continue to support activities to increase workforce development and job training, improve access to transit, increase affordable housing near high-quality schools, and target Section 3 and women and minority-owned businesses for City contracts.

How are the Jurisdiction poverty reducing goals, programs, and policies coordinated with this affordable housing plan?

The City aims to provide more housing in areas of high opportunity and reduce barriers to affordable housing. Potential activities include supporting and funding affordable development and rehab in high opportunity areas and tracking affordable housing developments to inform planning efforts.

SP-80 Monitoring – 91.230

Describe the standards and procedures that the jurisdiction will use to monitor activities carried out in furtherance of the plan and will use to ensure long-term compliance with requirements of the programs involved, including minority business outreach and the comprehensive planning requirements.

The City of Mobile will continue to implement and improve current monitoring practices of CDBG, HOME, and ESG activities to ensure compliance throughout the scope of the projects and funding cycle. Mobile's Community and Housing Development Department oversees the identification, procurement, and implementation of projects and funding sources with developers and non-profit organizations. Subrecipients are monitored on an ongoing basis, including regular reporting, on-site visits, and verification of record keeping in accordance with policies and procedures established by the Community and Housing Development Department.

The Community and Housing Development Department works closely with other departments, including Contract Compliance Officers to ensure contracts are performed in accordance with federal Labor Standards and Section 3 requirements.

The Community Planning and Development Department monitors federally funded projects that are implemented by other City Departments through a simple project tracking and management reporting system. This process includes monthly management reports, interdepartmental updates and meetings, closeout, and financial reports. Project expenditures are compared with budgets during draws and on a monthly basis.

Working with the Office of Supplier Diversity, the Community and Housing Development Department works to identify disadvantaged business enterprises (DBE), service-disabled veteran owned, women owned business (WBE), and small businesses (SBE) to participate in community development activities. The Office of Supplier Diversity exists to help DBEs overcome challenges. The programs and services provided through the Office of Supplier Diversity are a direct response by the City of Mobile to help DBE firms overcome challenges while helping to build a better Mobile.



2023-2024 Annual Action Plan

Community and Housing Development Department

Expected Resources

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

Introduction

The Community and Housing Development Department anticipates receiving \$2,355,380 in CDBG funds, \$976,211 in HOME funds, and \$209,600 in ESG funds for the 2023 program year. The City of Mobile anticipates that it will receive \$1,334,806 in CDBG program income (PI) and \$ 17,296 in HOME program income (PI) for FY 2023. The City's FY 2023-2024 program year starts on May 1, 2023 and ends on April 30, 2024.

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	Affordable Housing Infrastructure	2,355,380	1,334,806	0		9,421,520	A mix of infrastructure and public facility improvements, public services, housing rehabilitation, blight removal, workforce development, economic development, and Section 108 repayment.
HOME	public - federal	Affordable Housing Administration & Planning	976,211	17,296	0		3,904,844	Affordable rental housing development, down payment assistance, and affordable single family development by CHDOs and Developers.
ESG	public - federal	Homeless Prevention Administration & Planning	209,600		0		838,400	Street Outreach, Homeless Prevention, Rapid Re-housing, Emergency Shelter operations, and HMIS.

Table 58 - 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

The Community and Housing Development Department anticipates additional Federal and State funding that will be leveraged with annual HUD programs. Leverage and match sources will be identified on a project by project basis, where required for HOME and ESG programs.

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

The Mobile Neighborhood Renewal Program continues to identify blighted and vacant properties that are eligible for the program which clears the title on abandoned and tax delinquent properties. The goal of the program is to either stabilize the property or put it back into commerce, depending on market conditions. Working with local developers, the City will leverage these properties to improve market conditions and housing stock.

Discussion

The City plans to program federal, states and local funds to serve the community and meet needs of low-income households and individuals throughout the jurisdiction.

Annual Goals and Objectives

AP-20 Annual Goals and Objectives

Goals Summary Information

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
1	Increase Affordable Housing Opportunities	2023	2024	Affordable Housing Non-Homeless Special Needs		Affordable Housing	CDBG: \$1,019,786 HOME: \$ 894,157	Rental units rehabilitated: 4 Household Housing Unit Homeowner Housing Added: 4 Household Housing Unit Homeowner Housing Rehabilitated: 70 Household Housing Unit Direct Financial Assistance to Homebuyers: 25 Households Assisted
2	Address deteriorated and abandoned properties	2023	2024	Affordable Housing Non-Housing Community Development		Slum and Blight Removal	CDBG: \$450,000	Low/Moderate Income Households Benefited: 20 Households Buildings Demolished: 5 Buildings
3	Invest in Public Facilities and Infrastructure	2023	2024	Affordable Housing Non-Homeless Special Needs Non-Housing Community Development Economic Development		Public Facilities and Infrastructure	CDBG: \$280,000	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 1500 Persons Assisted

4	Promote Economic Development	2023	2024	Affordable Housing Homeless Non-Homeless Special Needs Non-Housing Community Development Economic Development		Economic Development	CDBG: \$1,050,000	Businesses assisted: 5 Businesses Assisted
5	Support for Public Services	2023	2024	Affordable Housing Homeless Non-Homeless Special Needs Non-Housing Community Development Economic Development		Public Services	CDBG: \$340,400	Public service activities other than Low/Moderate Income Housing Benefit: 1400 Persons Assisted
6	Provide support and services to Homeless	2023	2024	Homeless		Homelessness	ESG: \$ 194,200	Tenant-based rental assistance / Rapid Rehousing: 10 Households Assisted Homeless Person Overnight Shelter: 600 Persons Assisted Homelessness Prevention: 30 Persons Assisted
7	Administration	2023	2024	Administration, Planning, and Management Priority		Administration and Planning	CDBG: \$550,000 HOME: \$99,350 ESG: \$15,400	Other: 1 other

Table 59 – Goals Summary

Goal Descriptions

1	Goal Name	Increase Affordable Housing Opportunities
	Goal Description	Provide more housing in areas of high opportunity and reduce barriers to affordable housing. Potential activities include supporting and funding affordable development and rehab in high opportunity areas and track affordable housing developments to inform planning efforts.
2	Goal Name	Address deteriorated and abandoned properties
	Goal Description	Eliminate blighting influences and the deterioration of property and facilities. Potential activities include programmatic opportunities to invest in historic properties, analyze underutilized and vacant city-owned land for affordable housing development opportunities, increase coordination with fair housing and community development activities.
3	Goal Name	Invest in Public Facilities and Infrastructure
	Goal Description	Improve the safety and livability of neighborhoods. Support improvements to neighborhoods, community assets and facilities to reduce neighborhood disparities, improve access to transit, and provide safe community spaces.
4	Goal Name	Promote Economic Development
	Goal Description	Provide greater access to education, workforce, and business opportunities. Potential activities include workforce development and job training, continue partnerships with community colleges and employers, and target Section 3 and women and minority-owned businesses for City contracts.
5	Goal Name	Support for Public Services
	Goal Description	Address non-housing community development needs by supporting community-based public service programs, including, but not limited to programs for employment, public safety, child care, health, drug abuse, education, emergency food assistance, fair housing counseling, energy conservation, welfare (but excluding the provision of income payments identified under 570.207(b)(4)), homebuyer down payment assistance, rental assistance, or recreational needs.
6	Goal Name	Provide support and services to Homeless
	Goal Description	Assist persons who are homeless or at risk of being homeless by providing housing, housing assistance, and/or client centered services.

7	Goal Name	Administration
	Goal Description	Provide program management and oversight for the successful administration of federal, state, and local funded programs.

Projects

AP-35 Projects – 91.220(d)

Introduction

The City of Mobile proposes to allocate funds to a mix of housing-related activities, public services, homeless services, and homeless prevention activities. The City is also including a Float Loan program that may include multiple project types. Applications for the Float Loan program will be taken on a rolling basis.

Projects

#	Project Name
1	CDBG Planning and Administration
2	Section 108 Loan Repayment
3	City-wide Float Loan Program
4	CHD- Housing Rehabilitation
5	Residential Rehabilitation Loans
6	Microenterprise Loan Program
7	Public Facilities and Infrastructure
8	Slum and Blight Removal
9	Public Services
10	HESG23
11	HOME Planning and Administration
12	Down Payment Assistance
13	Affordable Housing: Homebuyer/Rental

Table 60 – Project Information

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

AP-38 Project Summary

Project Summary Information

1	Project Name	CDBG Planning and Administration
	Target Area	Neighborhood Revitalization Strategy Target Area City-wide
	Goals Supported	Administration
	Needs Addressed	Administration and Planning
	Funding	CDBG: \$550,000
	Description	Administration of the CDBG Program, including planning activities
	Target Date	4/30/2024
	Estimate the number and type of families that will benefit from the proposed activities	
	Location Description	City-wide
	Planned Activities	Administration of the CDBG Program, including planning activities
2	Project Name	Section 108 Loan Repayment
	Target Area	City-wide
	Goals Supported	Invest in Public Facilities and Infrastructure
	Needs Addressed	Public Facilities and infrastructure
	Funding	CDBG: \$220,000
	Description	Planned Repayment of Section 108 Loans

	Target Date	4/30/2024
	Estimate the number and type of families that will benefit from the proposed activities	
	Location Description	City-wide
	Planned Activities	Planned Repayment of Section 108 Loans
3	Project Name	City-wide Float Loan Program
	Target Area	City-wide
	Goals Supported	Promote Economic Development
	Needs Addressed	Economic Development
	Funding	CDBG: \$1,000,000
	Description	Float Loan Program funds will be available for economic development, slum/blight removal, low/moderate income housing, and infrastructure. Applications will be available to the public. Float loan applications will be qualified as they are received. The current projected float loan capacity is \$1,000,000. The capacity will be adjusted in accordance with the City's approved Citizen Participation Plan if necessary. All loan approvals, with the exception of those related to public housing, will require a letter of credit from a qualified lending institution prior to final approval. In the event the letter of credit requirement is waived and the loan becomes defaulted upon, the City would balance any shortfall by defunding Administration up to \$300,000, Blight Removal up to \$110,000, Volunteer Paint Program up to \$100,000, Residential Rehabilitation Loans up to \$250,000, and Housing Rehabilitation up to \$240,000. The term for float loans will be limited to the HUD requirement of 30 months.
	Target Date	4/30/2024

	Estimate the number and type of families that will benefit from the proposed activities	
	Location Description	City-wide
	Planned Activities	Float Loan Program funds will be available for economic development, slum/blight removal, low/moderate income housing, and infrastructure. Applications will be available to the public. Float loan applications will be qualified as they are received. The current projected float loan capacity is \$1,000,000. The capacity will be adjusted in accordance with the City's approved Citizen Participation Plan if necessary. All loan approvals, with the exception of those related to public housing, will require a letter of credit from a qualified lending institution prior to final approval. In the event the letter of credit requirement is waived and the loan becomes defaulted upon, the City would balance any shortfall by defunding Administration up to \$300,000, Blight Removal up to \$110,000, Volunteer Paint Program up to \$100,000, Residential Rehabilitation Loans up to \$250,000, and Housing Rehabilitation up to \$240,000. The term for float loans will be limited to the HUD requirement of 30 months.
4	Project Name	CHD- Housing Rehabilitation
	Target Area	Neighborhood Revitalization Strategy Target Area City-wide
	Goals Supported	Increase Affordable Housing Opportunities
	Needs Addressed	Affordable Housing
	Funding	CDBG: \$919,786
	Description	Homeowner Housing Rehabilitated, Housing Program Delivery costs associated with Housing Programs, Hurricane Fortified Roofing activities on owner-occupied houses, Volunteer exterior paint activities on residential properties, Rehabilitation of Vacant and/or Abandoned Houses for the primary purpose of providing housing for those that may be affected by the coronavirus pandemic.
	Target Date	4/30/2024

	Estimate the number and type of families that will benefit from the proposed activities	
	Location Description	City-wide
	Planned Activities	Homeowner Housing Rehabilitated, Housing Program Delivery costs associated with Housing Programs, Hurricane Fortified Roofing activities on owner-occupied houses, Volunteer exterior paint activities on residential properties, Rehabilitation of Vacant and/or Abandoned Houses for the primary purpose of providing housing for those that may be affected by the coronavirus pandemic.
5	Project Name	Residential Rehabilitation Loans
	Target Area	Neighborhood Revitalization Strategy Target Area City-wide
	Goals Supported	Increase Affordable Housing Opportunities
	Needs Addressed	Affordable Housing
	Funding	CDBG: \$100,000
	Description	Homeowner Housing Rehabilitated, Rental units rehabilitated
	Target Date	4/30/2024
	Estimate the number and type of families that will benefit from the proposed activities	
	Location Description	City-wide
	Planned Activities	Homeowner Housing Rehabilitated, Rental units rehabilitated

6	Project Name	Microenterprise Loan Program
	Target Area	City-wide
	Goals Supported	Promote Economic Development
	Needs Addressed	Economic Development
	Funding	CDBG: \$50,000
	Description	Provide funding, through forgivable loans, to eligible Microenterprises for bonding, insurance, and licensing expenses.
	Target Date	4/30/2024
	Estimate the number and type of families that will benefit from the proposed activities	
	Location Description	City-wide
	Planned Activities	Provide funding, through forgivable loans, to eligible Microenterprises for bonding, insurance, and licensing expenses.
7	Project Name	Public Facilities and Infrastructure
	Target Area	Neighborhood Revitalization Strategy Target Area City-wide
	Goals Supported	Invest in Public Facilities and Infrastructure
	Needs Addressed	Public Facilities and infrastructure
	Funding	CDBG: \$60,000
	Description	Rehabilitate or construct Public Facilities and/or infrastructure in the City in eligible census tracts
	Target Date	4/30/2024

	Estimate the number and type of families that will benefit from the proposed activities	
	Location Description	City-wide
	Planned Activities	Rehabilitate or construct Public Facilities and/or infrastructure in the City in eligible census tracts
8	Project Name	Slum and Blight Removal
	Target Area	Neighborhood Revitalization Strategy Target Area City-wide
	Goals Supported	Address deteriorated and abandoned properties
	Needs Addressed	Slum and Blight Removal
	Funding	CDBG: \$450,000
	Description	Removal of Slum and Blight within the Mobile City Limits
	Target Date	4/30/2024
	Estimate the number and type of families that will benefit from the proposed activities	
	Location Description	City-wide spot basis and designated blighted areas.
	Planned Activities	Removal of Slum and Blight within the Mobile City Limits
9	Project Name	Public Services
	Target Area	Neighborhood Revitalization Strategy Target Area City-wide
	Goals Supported	Support for Public Services
	Needs Addressed	Public Services
	Funding	CDBG: \$340,400

	Description	Public Service activities
	Target Date	4/30/2024
	Estimate the number and type of families that will benefit from the proposed activities	
	Location Description	City-wide
	Planned Activities	Public Service activities
10	Project Name	HESG23
	Target Area	Neighborhood Revitalization Strategy Target Area City-wide
	Goals Supported	Provide support and services to Homeless
	Needs Addressed	Homelessness
	Funding	ESG: \$209,600
	Description	Provide housing, financial assistance, and services to homeless persons or those at risk of becoming homeless.
	Target Date	4/30/2024
	Estimate the number and type of families that will benefit from the proposed activities	
	Location Description	City-wide
	Planned Activities	Provide housing, financial assistance, and services to homeless persons or those at risk of becoming homeless.
11	Project Name	HOME Planning and Administration
	Target Area	Neighborhood Revitalization Strategy Target Area City-wide

	Goals Supported	Administration
	Needs Addressed	Administration and Planning
	Funding	HOME: \$99,350
	Description	Administration of the HOME Program, including planning activities.
	Target Date	4/30/2024
	Estimate the number and type of families that will benefit from the proposed activities	
	Location Description	City-wide
	Planned Activities	Administration of the HOME Program, including planning activities.
12	Project Name	Down Payment Assistance
	Target Area	Neighborhood Revitalization Strategy Target Area City-wide
	Goals Supported	Increase Affordable Housing Opportunities
	Needs Addressed	Affordable Housing
	Funding	HOME: \$200,000
	Description	Down Payment and Closing cost assistance of up to \$100,000 for eligible low and moderate-income homebuyers.
	Target Date	4/30/2024
	Estimate the number and type of families that will benefit from the proposed activities	
	Location Description	City-wide
	Planned Activities	Down Payment and Closing cost assistance of up to \$100,000 for eligible low and moderate-income homebuyers.

13	Project Name	Affordable Housing: Homebuyer/Rental
	Target Area	Neighborhood Revitalization Strategy Target Area City-wide
	Goals Supported	Increase Affordable Housing Opportunities
	Needs Addressed	Affordable Housing
	Funding	HOME: \$694,157
	Description	Rental units constructed, Homeowner Housing Added, Direct Financial Assistance to Homebuyers
	Target Date	4/30/2024
	Estimate the number and type of families that will benefit from the proposed activities	
	Location Description	City-wide
	Planned Activities	Rental units constructed, Homeowner Housing Added, Direct Financial Assistance to Homebuyers

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 target area for entitlement funds is city-wide. The CDBG Down Payment Assistance Program will continue to be distributed in the Neighborhood Revitalization Strategy Area.

Geographic Distribution

Target Area	Percentage of Funds
Citywide	97
NRSA	3

Table 61 - Geographic Distribution

Rationale for the priorities for allocating investments geographically

These funds are a flexible tool that allows for programs that meet the goals of the Analysis of Impediments to Fair Housing and Consolidated Plan through investments in both areas of opportunity and geographies that lack resources. Funds are being used to invest in strategic community development initiatives throughout the City of Mobile to provide low-income residents with access to high opportunity areas and improve areas that need additional resources and investment.

Discussion

The NRSA is bounded by Conception Street Road on the north, St. Louis-St. Stephens Road on the south, Three Mile Creek on the west, and N. Conception Street on the east. The area includes the MLK Heritage Redevelopment Area and the entire area lies within a CDBG-Eligible Area. The City is seeking to extend the Neighborhood Revitalization Strategy Area (NRSA) for the term of the Consolidated Plan. The NRSA Plan was approved by HUD in 2013. The designation offers greater flexibility for the City to target federal resources to the neighborhood. The City will continue to target CHDO activities in the NRSA.

Stakeholders throughout the AI and Consolidated Plan process identified neighborhoods within the NRSA as those with the highest needs. In the NRSA there are opportunities to increase affordable housing opportunities for low and moderate-income families and improve quality of life.

Affordable Housing

AP-55 Affordable Housing – 91.220(g)

Introduction

The City plans to support the creation of new affordable housing units through new construction and/or rehabilitation utilizing HOME funds, in addition to improving existing single family housing by rehabilitating the homes of low and moderate-income homeowners and doing rehabilitation of rental properties utilizing CDBG funds. HOME funds will also be used in our down payment assistance program to assist eligible buyers acquire a home. The City will also utilize its ESG allocation for the support of those who are homeless or at risk of homelessness. The estimated 10 households supported through rental assistance include those households receiving homelessness prevention and rapid re-housing assistance, while the estimated 600 homeless households supported represent those individuals and households provided overnight shelter through an ESG-assisted homeless facility.

One Year Goals for the Number of Households to be Supported	
Homeless	600
Non-Homeless	40
Special-Needs	0
Total	640

Table 62 - One Year Goals for Affordable Housing by Support Requirement

One Year Goals for the Number of Households Supported Through	
Rental Assistance	10
The Production of New Units	4
Rehab of Existing Units	70
Acquisition of Existing Units	2
Total	86

Table 63 - One Year Goals for Affordable Housing by Support Type

Discussion

The goals listed above represent the City's plans for its 2023 allocations. The City currently has ongoing housing-related activities (utilizing prior years' resources) that will bring affordable units on-line throughout the 2023 program year.

AP-60 Public Housing – 91.220(h)

Introduction

The Mobile Housing Authority (MHA) provides 4,500 Housing Choice vouchers, along with 91 project-based vouchers and special program vouchers (including Veterans Affairs Supportive Housing, Family Unification, Emergency Housing Vouchers), and operates 1,363 public housing units. The combined waiting lists for MHA, as of January 18, 2023, counted 3,426 households.

MHA entered into a Recovery Agreement with HUD in January 2021 and outlined a strategy to rehabilitate current properties and improve tenant involvement. The city continues to work with MHA as they move forward to implement planned projects and work through their HUD Recovery Agreement and collaborating when needed.

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

MHA is in the process of vacating and demolishing three large housing developments that will reduce the public housing stock to 1,078 units. MHA plans outreach to landlords to encourage acceptance of Housing Choice Vouchers (HCVs).

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

MHA Resident Engagement staff provide residents resources for lifestyle and economic independence skills, access to credit counseling, and education opportunities. The Community & Family Empowerment Department offers the Family Self-Sufficiency Program which focuses on economic independence.

Career development programs are also offered and include GED tutoring, small business development workshops and the SWEET-P Summer jobs program which provides job training for residents 16-23. The City is partnering with the Mobile Housing Board to administer a Certified Nursing Assistant training program for low-mod income residents of the City.

MHA and the Community and Housing Development Department are looking at opportunities to provide down payment assistance for voucher holders and public housing residents seeking to become homeowners.

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

The City supports MHA in its efforts to resolve the troubled designation by partnering on support service opportunities and encourage affordable housing development that serves rental households at risk for severe cost burden.

Discussion

MHA's public housing units are at capacity, and demand for units and vouchers continues to be high based on the waiting list. MHA plans to rehabilitate its developments through the RAD program and issue project-based vouchers to help support the development of new affordable housing. As most MHA households and voucher users have incomes at or below 30 percent AMI and are at risk for severe housing cost burden, MHA needs to ensure efforts planned for affordable housing development in its 2023 Annual Action Plan⁴⁶ work towards filling the significant gap of affordable units for the lowest-income households identified in MA-15 of the Consolidated Plan. Actions may include engaging with developers and landlords to increase participation in the project-based and Housing Choice voucher programs.

⁴⁶ Mobile Housing Authority 2023 Annual Action Plan https://www.mobilehousing.org/files/2022-08-22-2023_Annual_Plan-Public_Review.pdf

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

Introduction

Housing First has a number of plans that address outreach and assessment of the homeless, unsheltered population. In late 2013, Housing First launched a full Community Outreach team, which was charged with providing assessment, referrals, and basic life case management services to those homeless unsheltered persons who live in Mobile City, Mobile County, and Baldwin County.

Housing First lead the Point-In-Time (PIT) count and holds Project Homeless Connect, a one-day event that connects those experiencing homelessness with free resources, including healthcare, legal assistance, housing assistance, and employment services. Further, Housing First has completed an action plan to fully implement the Coordinated Assessment process in the community. At this time, Phase 1 of this project has been developed and implemented. It assigns the Community Outreach team and 15 Place as first points of contact for homeless individuals and provides an active phone and email referral system that allows community members and homeless individuals to easily access the outreach services that are needed anywhere in the community with ease. Further planned elements that are expected to be completed include the following: (1) inclusion of satellite kiosks at partner service centers to reach distant part of the region (this system will also include translation services to assess the needs of non-English speaking individuals), (2) embed an Outreach team at 2-1-1 to provide effective and timely response to those who access the system through that channel, (3) linkage of the 2-1-1 system to HMIS, and (4) refinement of a community-wide assessment tool that will be able to translate to each involved program.

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

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

Mobile funds service providers, provides direct services, and manages the Homeless Management Information System for the CoC. The Coordinated Entry staff are regularly on site at local food pantries and at meal service locations to engage new households and provide awareness of the coordinated entry system. A dedicated field Intake Specialist is tasked with outreaching to and serving street homeless individuals throughout the service area. They also regularly visit known encampments and other locations where individuals less likely to utilize formal supports may be found.

In addition to outreach conducted by the Coordinated Entry staff, the community has expanded efforts to broaden awareness of homelessness in the region. In partnership with City of Mobile, the CoC, service providers, private citizens, and businesses participated in a Homeless Summit to raise awareness, connect organizations and provide outreach resources. These efforts expand the network for individuals

and organizations to seek assistance for homeless persons.

Addressing the emergency shelter and transitional housing needs of homeless persons

The City of Mobile will continue to allocate funds to service providers to provide emergency and rapid rehousing services to homeless persons through ESG funding.

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 Mobile will continue to allocate funds to service providers that provide shelter and services for women with children, families with children and women and children who have escaped domestic violence situations through ESG funding.

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

The City of Mobile will continue to allocate funding to service providers that provide resources to individuals and families who may become homeless including workforce development programs, educational programs for youth, services for seniors, and legal services. In addition to funding through CDBG and ESG, the Continuum of Care has dedicated resources to provide services to ex-offenders and persons with disabilities.

Discussion

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

Introduction:

There are several barriers to affordable housing. Some relate to negative perceptions about affordable housing and its occupants. Others relate to requirements of funding sources, dwindling funding for affordable housing, control and ownership of property, low property values, severely deteriorated housing stock in older neighborhoods, and low capacity of potential development partners to create and operate affordable housing successfully. An additional barrier that is not unique to Mobile is ageing and underperforming public housing. Without a highly efficient public housing system, the impact on affordable housing that the City provides is limited.

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

Heir Property: Some of the homeowners and individuals who apply to the CHD Department for assistance do not have clear title to their properties. We work with these individuals to establish ownership and legacy for their property, and we also refer individuals to the **South Alabama Volunteer Lawyers program and Legal Services of Alabama program** who can help these individuals clarify ownership and title issues.

Low Property Values: In many of Mobile's older, low- and moderate-income neighborhoods, property values are very low. This makes private investment difficult, and when using Federal resources, there is usually a significant subsidy required.

Tax Delinquent Property: The City is already implementing the "Expedited Quiet Title" program to address this issue. The CHD Department will continue to work with the Legal Department to capitalize on redevelopment opportunities that might present themselves. The CHD Department is currently working on a HOME-assisted development which is utilizing an NRP lot which had been vacant, blighted, and covered in trash.

Blighted Property: The City formed a Blight Task Force which brings together numerous City departments which are in some way involved in code enforcement, safety, and/or neighborhood redevelopment. There has been stepped up effort to work with delinquent property owners (many of whom no longer live in Mobile) to bring their property into compliance. The CHD Department also did a focused distribution of applications for homeowner rehabilitation assistance in targeted neighborhoods.

Zoning and Land Use: The City adopted a form-based code for its downtown area which would allow for more options developing affordable housing. Additionally, the CHD Department will work with developers and other partners on issues like variances that will allow greater density and parking

alternatives to meet City requirements.

Funding Requirements: Since our HOME projects sometimes involve other funding sources, we must be aware of the requirements associated with those sources. For example, the current Qualified Allocation Plan from the Alabama Housing Finance Authority currently incentivizes projects that are located in census tracts which are above 80% AMI (as a way to de-concentrate poverty). This is a good goal, but it has to be balanced with the need to redevelop older, lower-income areas.

Capacity Building: During the 2023 program year, the CHD Department will continue to provide technical assistance to groups considering undertaking affordable housing development.

Fair Housing: CHD staff recently met with staff from Mobile's Center for Fair Housing and Legal Services of Alabama to discuss ways to improve education and outreach related to fair housing choice.

Discussion:

The City will continue to pursue strategies designed to make housing affordable and accessible. As part of the Housing Rehabilitation Program, applicants are required to have a will or deed that clearly transfers ownership upon their death. If they do not currently have a will, the Alabama Volunteer Lawyers group as well as Legal Services of Alabama has agreed to assist them in creating one for free. The City will continue to work with MHA to convert most of its property to RAD, allowing them to primarily focus on their Housing Choice Voucher Program once they have repositioned.

AP-85 Other Actions – 91.220(k)

Introduction:

In addition to the activities in the 2021 Action Plan, the CHD Department continuously works to foster relationships within and across sectors which will promote efficiencies and create more opportunities for the low and moderate-income individuals and communities we serve.

Actions planned to address obstacles to meeting underserved needs

The majority of underserved needs are within the CDBG target area. The programs, services, and activities described in this plan will largely focus in the minority, low-income neighborhoods, most particularly within the Neighborhood Revitalization Strategy area (where low- and moderate-income households are over 70%) and the City's local target areas. In addition to the activities in the 2023 Action Plan, the CHD Department will continue efforts and utilize funds from prior years' Action Plans for activities related to promoting economic development, demolition of vacant and blighted properties, increasing the capacity of Community Based Development Organizations, and ADA modifications for low- and moderate-income homeowners.

The City will also continue to implement its Limited English Proficiency (LEP) Plan to encourage engagement of LEP individuals so that they may effectively access services that will help them to become more productive citizens and members of the community. The City will also continue to work with partners in the community to promote financial education for low- and moderate-income individuals and households through partnerships with Bank On South Alabama and the Asset Building Coalition.

In an effort to overcome the obstacles of homelessness in Mobile, the City in the PY 2016-17 created a Homeless Taskforce to discuss the status and impact of homelessness in the city and continue the dialogue of homeless issues and strategies for extremely and very-low income populations, including permanent housing, transitional housing and services.

Currently we are working on making a provision for hardship of organizations to allow them to participate in the program thus bringing on more transitional housing beds and emergency shelter beds. The VA programs are not able to pay fees to be a part of HMIS and they have transitional housing and permanent housing services but are not able to coordinate with us if they cannot participate in HMIS.

Through the housing programs of the Community and Housing Development Department, the City of Mobile seeks to meet the needs of the underserved. By participating in the Continuum of Care, City staff is engaged in setting the priorities and planning for the needs of the homeless in Mobile. Through Housing First, chronically homeless persons have obtained permanent housing and supportive services to maintain housing stability. The City's Housing Rehabilitation Program for homeowner repair provides grants to qualified households. The City will continue to administer the Down Payment Assistance program to assist qualified homebuyers with down payment and closing cost assistance.

CHD will leverage City funds to develop 3- to 5-year Neighborhood Revitalization Plans once the City's updated Zoning regulation has been adopted to assist with addressing the obstacles in meeting the needs of underserved neighborhoods. CHD will look at the results from previous years' plans for Africa Town and the South Oakleigh neighborhoods as well as plans underway city-wide to determine which implementation tasks to take on and for the best location to begin. These plans will include work plans and strategies for affordable housing, elimination of slum and blight, code enforcement, economic development opportunities, and historic preservation.

Actions planned to foster and maintain affordable housing

In PY 2023, CHD will continue to implement several neighborhood revitalization plans and City studies in CDBG target area neighborhoods to assist with identifying strategies to foster housing development and redevelopment of affordable housing. In addition, CHD is developing a strategy to create and implement a public and private structure for housing development and redevelopment, advocacy, and funding. The goal is to create a public/private component which would allow CHD to leverage CDBG and HOME funds by creating additional resources for sustainable neighborhood and housing redevelopment.

The City of Mobile will continue to target households whose incomes are 80% or below of the area median income. The City will continue to fund the Homeowner Housing Rehab Program that provides assistance to low- and moderate-income owners so that they can make repairs to support the sustainability of their homes. To better serve the community, the CHD Housing staff has implemented new bid processes and restructured staff to improve the quality of service provided to citizens.

The City of Mobile's Community and Housing Development Department's housing programs are designed to implement various housing assistance strategies that include rehabilitation and down payment assistance. The City's community and neighborhood development activities are designed to:

- Assist with neighborhood improvement projects
- Help low and moderate-income homeowners, including the elderly and disabled
- Provide housing rehabilitation
- Eliminate slum and blight conditions

The CHD will continue to use its HOME funds to create more affordable rental units. CHD works with both nonprofit and for-profit developers on projects of various sizes, all of which are designed to serve rental households at or below 60% of the area median income.

Actions planned to reduce lead-based paint hazards

The City's homeowner rehabilitation lead testing and mitigation program will continue. Applicants for rehabilitation funding receive the required lead-based paint information and understand their responsibilities. CHD staff determines whether proposed projects are exempt from some or all lead-based paint requirements. Properly qualified personnel perform risk management, paint testing, lead hazard reduction, and clearance services when required. The City has a contract with the University of Alabama's Safe State Environmental Program to provide testing as necessary. Additionally, CHD staff

works with contractors to encourage them to receive their Lead Safe Work Certification so they can bid on those construction jobs.

Actions planned to reduce the number of poverty-level families

According to 2021 American Community Survey census data, 45 of the 135 census tracts in the City of Mobile have rates of 20% or greater below the poverty level. The Community and Housing Development Department addresses the problems of poverty through its strategic goals. Through a holistic approach that combines safe, decent affordable housing for low- and moderate-income families and the provision of public services. Through the implementation of its Consolidated Plan, the City of Mobile will coordinate with local organizations to ensure that goals are met.

Actions planned to develop institutional structure

Effective implementation of the five-year Consolidated Plan involves a variety of agencies and organizations. Coordination and collaboration between agencies are important to ensure that the needs within the City are adequately addressed. The key agencies that are involved in the implementation of the Plan as well as additional resources that may be available are described below:

- The City of Mobile, through its Community and Housing Development (CHD) Department is responsible for the administration of the City's HUD-funded entitlement programs: CDBG, HOME, and ESG. CHD's responsibilities include managing and implementing the 2018-2022 Consolidated Plan, the Annual Action Plans, and other related programs. CHD administers the City's housing and economic development programs. CHD staff has extensive experience in the development of affordable housing, supporting social service programs, promoting economic development programs and investment, and revitalizing distressed neighborhoods.
- The Mobile Housing Authority (MHA) administers public housing and Section 8 rental assistance programs. In late 2014, MHA put together its Housing Transformation 2020 plan which evaluated their developments and created a vision of being a catalyst for community and family empowerment. In January 2015, MHA was awarded two Choice Neighborhood Planning grants which will allow them to begin the massive planning process for the redevelopment of the Roger Williams community and the South Michigan community. These items, along with other efforts, serve as an opportunity for a dramatic shift in the public housing landscape in Mobile.
- Both nonprofit and for-profit developers play a role in the implementation of the Consolidated Plan and Action Plan through the creation and/or preservation of affordable housing units. These developers access funding from CHD, private financial institutions, and other sources.
- There are currently two organizations that have been certified as a Community Housing Development Organization (CHDO) operating in the City of Mobile. The City will continue to outreach to organizations that may be interested and can qualify as CHDOs operating within Mobile.
- The private sector is also an important collaborator in the services and programs associated with CHD's programs and initiatives. The private sector brings additional resources and expertise that

can be used to supplement existing services or fill gaps in the system. Several lending institutions provide first-time mortgage financing in partnership with CHD's down payment assistance program. Lenders, developers, business and economic development organizations, and private service providers offer a variety of assistance to residents such as healthcare, small business assistance, home loan programs, and assisted housing.

The City is working with citywide non-profits on capacity building. The City will be continue providing seminars and meeting space for non-profits to assist them in furthering their institutional structure needs.

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

The City has a strong intergovernmental cooperation with agencies. The City coordinates with Mobile County, Mobile Housing Board, and neighboring jurisdictions on matters related to housing as well as economic and community development. Collaboration is ongoing with community stakeholders and partners including neighborhood associations, nonprofit agencies and service providers, state and local agencies, the faith-based community, universities and colleges, and health institutions.

The City is considering engaging professional consultants to provide technical assistance services and programs related to community and economic development projects. The consultant will exercise a multi-disciplined approach to economic, housing, and community development projects through their expertise in real estate, housing finance, bonding, federal and state funding mechanisms, and private sector placement.

The focus of the partnership will be to assist the City of Mobile with matching community, housing, and economic development financing needs with the best and most feasible capital resources. The consultant will work with the City to obtain private funding for projects by arranging meetings with private financial institutions similar to the functions performed by an investment banker or a mortgage broker.

The sole purpose of this partnership is linking public and private sectors to create community, housing, and economic development projects. In its catalyst role, the consultant's primary objectives are job creation, business development, and construction and/or rehabilitation of housing units. These are common objectives of the City and local partners.

Relationships are key to the success of housing, community, and economic development efforts within the City of Mobile.

Discussion:

Program Specific Requirements

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

Introduction:

The City of Mobile will comply with all program specific requirements including using the HUD provided HOME affordable homeownership limits for newly constructed housing and for existing housing. All HOME funds are administered by the City of Mobile.

The City of Mobile advertises CDBG and HOME funded programs by issuing press releases, publishing ads in the paper, and engaging in community outreach activities. Flyers are made available at the Community and Housing Development Department and are left at properties cited by Municipal Enforcement for code enforcement violations. Additionally, the City provides information to local developers by issuing RFPs that announce available funding and publishes applications online. Applications for individual assistance are available in the Community and Housing Development Department. The City recently began listing all available bids online and Community and Housing Development has been integrated into that system.

The City will be using a Float Loan Program which has a projected estimated capacity of \$1,000,000 using CDBG funds. These Float Loans will be for eligible activities as described in the Project Section of the Action Plan. The most probable use of Float Funds will be for construction financing. Float Loans will have terms ranging from 12-30 months at a rate of 0-3%. All Float Loans, with the exception of those related to public housing, will require an irrevocable letter of credit from a financial lending institution in order to alleviate risk. In the event that the irrevocable letter of credit requirement is waived and the loan becomes defaulted upon, the City would balance any shortfall by defunding Administration up to \$300,000, Blight Removal up to \$110,000, Volunteer Paint Program up to \$100,000, Residential Rehabilitation Loans up to \$250,000, and Housing Rehabilitation up to \$240,000.

Eligible homebuyer applicants are any person or household that is of low/mod income. For homebuyer and rehabilitation assistance, applicants will be served on a first-come basis based on need of funds until funding is exhausted. The down payment assistance applicants are typically referred by a lending institution to make up a gap in financing based on their underwriting criteria.

Eligible multi-family applicants are any entity or individual that meets the HOME criteria for having sufficient experience and will provide the needed mix of varying income level units as required by the HOME program. Developer assistance proposals will be accepted on a rolling basis and will be taken into consideration based on current City needs, leveraging of funds, and the need of housing in the proposed area. There will be no limits or preferences given to different segments of the low/mod population for any type of activity beyond those required for HOME multi-family activities. Police officers and firemen/firewomen can qualify for a higher amount of Down Payment Assistance, if they qualify.

The City of Mobile uses HOME affordable homeownership limits for the area as provided by HUD when HOME funds are being used for homebuyer assistance or the rehabilitation of owner-occupied single

family housing. In the case that HOME affordable homeownership limits for the area are not used, it will determine 95 percent of the median area purchase price and set forth the information in accordance with 24 CFR 92.254(a)(2)(iii).

Detailed information on the City's selection process and underwriting criteria is available at 205 Government St.; South Tower-Suite 508; Mobile, AL 36602.

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	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	1,000,000
Total Program Income	1,000,000

Other CDBG Requirements

1. The amount of urgent need activities	0
2. The estimated percentage of CDBG funds that will be used for activities that benefit persons of low and moderate income. Overall Benefit - A consecutive period of one, two or three years may be used to determine that a minimum overall benefit of 70% of CDBG funds is used to benefit persons of low and moderate income. Specify the years covered that include this Annual Action Plan.	75.00%

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

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

The City of Mobile does not intend to utilize other forms of investment beyond those identified in Section 92.205.

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

The City of Mobile utilizes HOME funds for assisting homebuyers through down payment assistance, new construction, and rehabilitation. For those activities, the City will utilize recapture provisions in accordance with 24 CFR 92.254(a)(5)(ii)(A)(2) which provides for the option of a prorated reduction of HOME investment amount to be recaptured during the affordability period.

HOME funds will be provided as a direct subsidy to the eligible household in the form of a deferred, forgivable loan. There will be no payments required during the term of the loan. A mortgage and promissory note will be executed and recorded to secure the City's lien on the property and to outline the recapture provisions. The City will allow this mortgage to be in a subordinate position. The affordability period and associated recapture provisions will be based on the following levels of assistance: a) 5 years for \$1,000 - \$14,999, b) 10 years for \$15,000 - \$40,000, and c) 15 years for over \$40,000.

For each full year the homeowner continues to own and occupy the property as their primary residence, the applicable percentage of the original loan amount will be forgiven at the anniversary date of the signing of the mortgage and note. If the homeowner retains ownership and occupies the property as their primary residence for the full affordability period, the entire amount of the loan shall be considered forgiven. The mortgage will then be cancelled and released in the records of the Probate Court.

If, during the affordability period, the homeowner sells the property, transfers title, or ceases to occupy the property as their primary residence, they will be required to repay the City that portion of their loan which has not been forgiven. For example, if the homeowner was given an initial loan of \$20,000 (to be forgiven over 10 years), and the homeowner sold the property after four years, the City would recapture \$12,000 which represents 60% of the original loan amount.

In the event of a sale during the affordability period (whether voluntary or involuntary), the amount subject to recapture is limited to the net proceeds after the first mortgage (if applicable) is repaid.

For homebuyer activities, the City ensures that there will always be a direct subsidy to the homebuyer.

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

In addition to the recapture provisions described above for single family homes assisted with HOME funds (through acquisition, rehabilitation, or new construction), the City ensures affordability

compliance on its HOME-assisted multifamily units as well. These affordability provisions are contained in the City's HOME Loan Agreement and Mortgage. Borrowers also execute a Declaration of Land Use Restrictive Covenants that ensures that the HOME Program rent and income restrictions will remain in place on the property throughout the affordability period, even if the property is sold to another owner and/or the HOME loan is paid off.

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

The City does not intend to use HOME funds to refinance existing debt secured by multifamily housing that is being rehabilitated with HOME funds.

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

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

The ESG subrecipient agency must conduct an initial evaluation to determine the eligibility of each individual or family's eligibility for ESG assistance and the amount and types of assistance the individual or family needs to regain stability in permanent housing. These evaluations must be conducted in accordance with the centralized or coordinated assessment requirements set forth under Section 576.400(d) and the written standards established under Section 576.400(e).

In accordance with the statute, as an initial evaluation for homelessness prevention assistance, an individual or family must meet two threshold criteria and must exhibit one or more specified risk factors. The individual or family must have a household income at or below 30% of the area median income, and they must have insufficient resources immediately available to attain housing stability. These "at risk" factors are further identified as follows: (1) has moved frequently due to economic reasons, (2) is living in the home of another because of economic hardship, (3) has been notified that their right to occupy their current housing or living situation will be terminated, (4) lives in a hotel or motel, (5) lives in severely overcrowded housing, (6) is exiting an institution, or (7) otherwise lives in housing that has characteristics associated with instability and an increased risk of homelessness.

The subrecipient must re-evaluate the program participant's eligibility and the types and amounts of assistance the program participant needs not less than once every 3 months for program participants receiving homelessness prevention assistance, and not less than once annually for program participants receiving rapid re-housing assistance. At a minimum, each re-evaluation of eligibility must establish that (1) The program participant does not have an annual income that exceeds 30% of the area median income (as determined by HUD) and (2) The program participant lacks sufficient resources and support networks necessary to retain housing without ESG assistance.

When the program participant's income or other circumstances change (e.g. changes in household composition) that affect the program participant's need for assistance under ESG, the subrecipient must re-evaluate the program participant's eligibility along with the amount and types of assistance the program participant needs. When determining the annual income of an individual or family, the recipient or subrecipient must use the standard for calculating annual income under 24 CFR 5.609. Finally, subrecipients must assist each program participant, as needed, to obtain appropriate support services, including assistance in obtaining permanent housing, medical health treatment, mental health treatment, counseling, supervision, and other services essential for achieving independent living.

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

Coordination to assist the homeless and prevent homelessness will be led by the CoC. Active engagement and membership in the CoC is required to receive funding. The CoC will further engage and coordinate resources to improve current programs and funding strategies, and will provide ongoing

training in partnership with the City's Community and Housing Development Department as procedures are refined.

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

For the 2021 Program Year, the City announced an open, competitive application process in November 2020, with applications being due in December 2020. These applications were scored separately by three reviewers from the Community and Housing Development Department who utilized a scoring matrix that awarded points based on: Community Need, Program Description and Effectiveness, Agency Management, and Past Performance. Funding recommendations were based on those scores while also staying within the limitation that no more than 60% of our ESG allocation could go to the combined activities of Street Outreach and Emergency Shelter.

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

As a condition of their award funding, the City requires ESG subrecipients to have a homeless person or formerly homeless person involved in a policy-making capacity or in the operations of their programs to satisfy the ESG homeless participation requirement. There are also such representatives on the CoC Board of Directors.

5. Describe performance standards for evaluating ESG.

The following performance standards will be used to evaluate ESG activities:

- Unduplicated number of persons or households prevented from becoming homeless
- Unduplicated number of persons or households assisted from emergency shelters (or living on the street) into permanent housing
- Lowering the recurrence of periods of homelessness for individuals and households assisted with ESG funds
- Improving the financial stability of those individuals and households assisted with ESG funds

Appendix - Alternate/Local Data Sources

Mobile Housing Authority Provided Data

Totals in Use

	Program Type								
	Certificate	Mod-Rehab	Public Housing	Vouchers			Special Purpose Voucher		
				Total	Project -based	Tenant -based	Veterans Affairs Supportive Housing	Family Unification Program	Disabled *
# of units vouchers in use	0	0	1,327	3,544	85	3,459	43	22	182

NA-35 Table 23 - Public Housing by Program Type

*includes Non-Elderly Disabled, Mainstream One-Year, Mainstream Five-year, and Nursing Home Transition

Characteristics of Residents

Program Type								
	Certificate	Mod-Rehab	Public Housing	Vouchers				
				Total	Project -based	Tenant -based	Special Purpose Voucher	
							Veterans Affairs Supportive Housing	Family Unification Program
Average Annual Income	0	0	\$13,936	\$14,242	\$12,027	\$14,292	\$12,202	\$15,554
Average length of stay (months)	0							
		0	7	77	51	77	38	41

Program Type								
	Certificate	Mod-Rehab	Public Housing	Vouchers				
				Total	Project - based	Tenant - based	Special Purpose Voucher	
							Veterans Affairs Supportive Housing	Family Unification Program
Average Household size	0	0	2	2	2	2	1	4
# Homeless at admission	0	0	0	109	2	107	7	7
# of Elderly Program Participants (>62)	0	0	533	573	32	538	18	3
# of Disabled Families	0	0	362	934	35	893	18	3
# of Families requesting accessibility features	0	0	47	58	0	24	20	14
# of HIV/AIDS program participants	0	0	0	0	0	0	0	0
# of DV victims	0	0	0	0	0	0	0	0

NA-35 Table 24 – Characteristics of Public Housing Residents by Program Type

Race of Residents

Race	Certificate	Mod-Rehab	Public Housing	Program Type					
				Vouchers					
				Total	Project-based	Tenant-based	Special Purpose Voucher		
							Veterans Affairs Supportive Housing	Family Unification Program	Disabled *
White	0	0	38	149	1	146	12	5	3
Black/African American	0	0	1,288	3,332	82	3,244	26	17	20
Asian	0	0	0	4	0	4	0	0	0
American Indian/Alaska Native	0	0	1	6	0	6	0	0	0
Pacific Islander	0	0	0	2	0	2	0	0	0
Other	0	0	0	8	3	5	0	0	0

*includes Non-Elderly Disabled, Mainstream One-Year, Mainstream Five-year, and Nursing Home Transition

NA-35 Table 25 – Race of Public Housing Residents by Program Type

Ethnicity of Residents

Ethnicity	Certificate	Mod-Rehab	Public Housing	Program Type					
				Vouchers					
				Total	Project-based	Tenant-based	Special Purpose Voucher		
							Veterans Affairs Supportive Housing	Family Unification Program	Disabled *
Hispanic	0	0	6	17	0	17	0	0	2
Not Hispanic	0	0	1,321	3,484	86	3,390	38	22	172

*includes Non-Elderly Disabled, Mainstream One-Year, Mainstream Five-year, and Nursing Home Transition

NA-35 Table 26 – Ethnicity of Public Housing Residents by Program Type

Totals Number of Units

Program Type									
	Certificate	Mod-Rehab	Public Housing	Vouchers					
				Total	Project-based	Tenant-based	Special Purpose Voucher		
							Veterans Affairs Supportive Housing	Family Unification Program	Disabled *
# of units vouchers available			1363 (including remaining occupied units at S18 properties)	4,572	91	4,481	60	32	297
# of accessible units			85 + 5 under construction						
*includes Non-Elderly Disabled, Mainstream One-Year, Mainstream Five-year, and Nursing Home Transition									

MA-25 Table 40 – Total Number of Units by Program Type

Summary of Public Comments

The City of Mobile provided opportunity for public input, review and comments at several points in the development of the Consolidated Plan and Action Plan:

- *PY23 Action Plan Hearing held in person and virtually on October 19, 2022*
- *PY23 Action Plan Technical Assistance Workshop was held in person and virtually on November 15, 2022*
- *PY23 Action Plan Hearing was held during the City Council meeting on January 12, 2023*
- *The public comment period was advertised and open from March 15 -April 20, 2023*

No comments were received by the City of Mobile during or after these meetings, or during the public comment period to be addressed.

Community Survey Responses

Provided in a separate attachment.