Executive Summary

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

1. Introduction

The City of League City is an Entitlement Jurisdiction (EJ) receiving an annual non-competitive Community Development Block Grant (CDBG) from the U.S. Department of Housing and Urban Development (HUD). League City's Program Year 2020 begins on October 1, 2020 and ends on September 30, 2021. The City of League City will receive \$450,318 for PY 2020, a \$62,766 increase over PY 2019. While the grant is non-competitive, the EJ must produce an Annual Action Plan (AAP) each year to receive the funds from HUD. The AAP describes the City's planned investments for the coming program year, including proposed projects and activities.

2. Summarize the objectives and outcomes identified in the Plan

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

During PY 2020, the City of League City intends to:

- 1. Allocate the total allowable 15% to three public service agencies for four projects, providing assistance to low-income city residents:
 - a. Communities in Schools Bay Area to provide \$30,000 to partially fund counselors in two middle schools and one high school for the provision of a variety of academic, social, and emotional support to 60 at risk students and their parents. The counseling is aimed at reducing drop-outs and dysfunctional behaviors as well as addressing the families' needs, including referrals to other social services and housing assistance. Each year, approximately 10% of the students assisted are homeless.
 - b. Clear Creek Independent School District to provide \$7,883 to partially fund a contract psycho-social counselor in an elementary school for at-risk low- to moderate-income League City students.
 - c. Interfaith Caring Ministries to provide emergency funds to those in need of food, emergency rental assistance and emergency utility assistance. The City will provide \$5,664 in CDBG funds for the food pantry to assist approximately 500 individuals in 200 households. In addition, the City will provide \$24,000

- for emergency rent and/or utility assistance to 20 households assisting 40 residents.
- d. Augment local funds for improvements to Main Street/Park Avenue Target Area, through the reconstruction of 3rd Street from Wisconsin to Alabama through complete with mill work and repaying;
- 2. Planning and administration/management of the CDBG program.

The City will continue to use PY 2019 funds to complete the reconstruction of a section of parking at League Park and the construction of a new parking lot across the street from League Park during the improvements to the park. This project was begun in PY 2019 and will continue to completion, though will not use PY 2020 funds.



PY 2020 Third Street Repaving and PY 2019 League Park Parking Lots

3. Evaluation of past performance

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

League City has continued to strive for perfection in managing the CDBG program. During PY 2019, the City created a new position of Grants Administrator in the Finance Department to manage all City grants. As a result, the Grants Administrator has streamlined the process for acting on subrecipient reimbursement requests and contractor invoices. The Planning Manager in the Planning and Development Department is still the overseer of program development and implementation. This division of duties has resulted in some confusion initially but a more comprehensive approach to program administration. The Grants Administrator is able to review all City grants to prevent any duplication of benefits, determine any areas where there are gaps in funding, and to seek out new funding sources to build program sustainability.

Communities in Schools has exceeded their proposed goals each year. During PY 2019, with the COVID-19 pandemic, the counselors partially funded by CDBG continued to perform their duties via telephone calls and virtual meetings with the students and families. Their counseling and resource sharing shifted to include addressing the emotional and financial effects of COVID-19. As they moved through the end of the school year and summer, they have reassessed how to best handle caseloads in what will soon be a new normal.

Interfaith Caring Ministries (ICM) met their goals in past years, with the exception PY 2018, when staff changes and the institution of a new client tracking software caused them to fall behind in documenting eligibility for those clients seeking emergency rent and utility assistance. As a result, for PY 2019, the City reduced their funding significantly. ICM quickly got back on track with more oversight by the Executive Director and their rent and utility allocation was quickly expended and their food pantry allocation is being spent in a timely manner. As a result of their return to more efficient and complete performance, they were awarded the majority of the CDBG-CV funds for rent and utility assistance. In the past, ICM has only allowed clients to receive one month of assistance per year. The economic impact of COVID-19, with landlords deferring but not waiving rents, the City and ICM determined that the best course of action to prevent homelessness with these funds is to allow for up to three consecutive months of assistance as the regulations allow.

The City completed its Park Avenue reconstruction project in PY 2019 and began the redevelopment of League Park. CDBG funds were allocated for the reconstruction of approximately half of the existing strip parking and the development of a new parking lot for League Park as part of the overall redevelopment. The work is underway, though delayed due to COVID-19. The parking lots will be completed in PY 2020. In PY 2018, the City halted its application process for a Section 108 Loan Guarantee as it was determined that other local funds would be more appropriate at this time to expedite improvements slated for the Main Street/Park Avenue Target Area.

4. Summary of Citizen Participation Process and consultation process

Summary from citizen participation section of plan.

Throughout the year, the City has continued to consult with planners, engineers, stakeholders, and residents on the Main Street Improvement Plan, which includes the Main Street/Park Avenue Target Area. CDBG funds are an integral part of the overall improvement plan for this low- to moderate-income neighborhood. Any public and professional participation in the decision-making process of the complete plan is tied closely with the public participation and consultation of the CDBG infrastructure programming. Additionally, the City works closely with its public service recipients and reaches out to all other public service agencies to determine the changing social service needs and amenities in the community. The City encourages eligible agencies to apply for public service funding through CDBG. With the new Grants Administrator, the team is able to identify other grants that might be a possible match for a partnership between the City and one or more community-based service providers. Clear Creek ISD will be a new subrecipient in PY 2020 using its funding to assist in the expansion of the duties of a contract licensed clinician to provide direct therapeutic services to the students in the district's elementary schools. Communities in Schools provides support services in the intermediate and high schools and the CCISD clinician provides support services to elementary school children.

For the PY 2020 planning process, the City hosted two public hearings. The first, held on February 20, 2020 provided an explanation of the CDBG program and invited questions and comments from attendees. At the end of the public hearing, the City hosted a pre-application workshop for agencies interested in applying for PY 2020 funding. Throughout the year, particularly during the application process, the City staff is available to meet with all interested parties, be they individuals, agencies, businesses, or elected officials. The potential applicants are encouraged to meet with the CDBG team to discuss their programs, share the agency and community needs, and receive input into the best approaches for requesting funding. This year, Clear Creek ISD became involved in the planning process and applied for funding. Bay Area Turning Point became involved in the process but declined to submit an application.

The second public hearing was held on July 23, 2020 during the 30-day public comment period. This included a review of the Annual Action Plan draft, soliciting input from the attendees. COVID-19 has thrusted League City and all governmental agencies into the world of virtual meeting. This second public hearing was a hybrid, both in-person and though Zoom. Information was provided on how to submit comments and questions even if viewed after the fact. The notice for the public hearing also provided notice of the 30-day public comment period. Both public hearings, the 30-day public comment period and the public service application were publishing in the Galveston Daily News, the local general circulation newspaper, at City Hall, and on the City's website and Facebook page in English and Spanish.

Annual Action Plan

The public hearing notices, as well as the City Council agenda were posted at least 72 hours before the meeting.

On August 11, 2020, the City Council approved the Annual Action Plan and the agenda item was posted more than 72 hours in advance at City Hall and on the City's website. Attendees had time at the start of the meeting to voice their opinions and concerns. The meetings are streamed live with the ability to accept on-line public comments, and are replayed on the municipal access channel daily at 10:00 AM and 6:00 PM.

5. Summary of public comments

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

6. Summary of comments or views not accepted and the reasons for not accepting them The City of League City accepts and reviews every comment voiced at public hearings, or provided via phone, email, Facebook, in person, during virtual meetings or general postal mail. Comments that are not relevant to the CDBG program are noted and forwarded to the appropriate department. Any comments that are discriminatory or derogatory toward an individual or group are not considered. Otherwise, all comments and view are considered in the planning process and the general administration of CDBG funds.

7. Summary

The City strives to be as effective and efficient as possible when disbursing and managing CDBG funds. Given the limited annual allocation, the funds are used to augment or leverage local and other grant funding to the extent possible for public services city-wide to low-income residents and for infrastructure and public facilities within the Main Street/Park Avenue Target Area — the area with the highest percent of low-income in the city. Because League City is a suburban community, the economies of scale prevent most public service agencies from locating in League City or Houston-based agencies having satellite offices in League City. As a result, few agencies apply for funding each year and the City makes every attempt to fund all applicant agencies that have eligible activities. This year only Communities in Schools — Bay Area, Clear Creek ISD and Interfaith Caring Ministries applied. All three have been included for funding.

The City makes every attempt to involve its residents and stakeholders in the planning and implementation process. Public hearings and meetings are held in central, known locations in or adjacent to the primary CDBG Target Area. Public notices are provided in the local daily general circulation newspaper, on the City's postings at City Hall, on Facebook and on the City's

website. COVID-19 has pushed the City into hosting virtual and hybrid meetings that will hopefully garner more attendance and support for our program in the future.



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

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

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

Agency Role	Name	Department/Agency
CDBG Administrator	City of League City – Kris Carpenter	Planning & Development

Table 1 - Responsible Agencies

Narrative (optional)

The Planning and Development Department of the City of League City has been responsible for managing the CDBG program since the City's first year as an Entitlement Jurisdiction. During PY 2019, the City created a new Grants Administrator position in the Finance Department. Both departments now share in the overall management of the CDBG program. Other Finance Department staff members are responsible for coordinating with the Grants Administrator in paying all invoices and drawing funds from the U.S. Treasury. Public improvement projects are carried out by the appropriate department, such as Engineering, Public Works, and Parks and Cultural Services. The Communications and Media Relations Department facilitates disbursing information.

Consolidated Plan Public Contact Information

Kris Carpenter Planning Manager Planning Department City of League City 500 W. Walker St. League City, TX 77573 281-554-1098

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

1. Introduction

League City consults with a number of local and regional agencies throughout the year and works to coordinate with all agencies serving the community. During the development of the PY 2017- PY 2021 Consolidated Plan the City consulted and coordinated with the regional and state agencies as well as local social service agencies in the community. Each year, the City has and will continue to coordinate with Federal and State agencies and the Houston Galveston Area Council for activities and funding related to transportation, environmental issues and hazard mitigation, particularly Hurricane Harvey disaster relief and COVID-19 hazard mitigation activities. Because aspects of the CDBG program management are in the Planning and Development Department, the department uses public forums for general planning activities to determine changing needs and perceptions of the stakeholders and community for all City functions, including the CDBG program.

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))

There is no public housing agency that serves League City. There are two Low Income Housing Tax Credit properties in League City - Bay Colony Apartments with 250 units and Village on Hobbs Road with 80 units. Village on Hobbs Road targets the elderly but Bay Colony Apartments does not target any population group. Both developments accept Housing Choice Vouchers, however with no public housing agency in League City, the only near-by HCV providers are Texas City Housing Authority, Pasadena Housing Authority and Harris County Housing Authority. They have the discretion of limiting voucher holders to properties within their jurisdictions. The City coordinates with Southeast Texas Housing (SETH), which has provided housing rehabilitation services on a limited basis to needy League City homeowners. There are few health and mental health agencies in League City. Gulf Coast Center, serving Galveston and Brazoria Counties, has a satellite office in League City that provides intellectual and development disability services. Devereux, a national behavioral healthcare provider, has a facility in League City and the City is working to establish a relationship with them to access relevant local information about mental health issues and services in the area. League City is fast becoming a medical hub for northern Galveston County with the development of UTMB-League City campus clinic and hospital. Other medical facilities are following suit. As the medical complex develops the City has been coordinating and collaborating activities and information to the extent possible. Bay Area Turning Point provides emergency shelter and crisis intervention to victims of domestic abuse and sexual assault and periodically

requests/receives CDBG funds from League City. The City's Police Department coordinates with Bay Area Turning Point in a number of protective and educational efforts, including safe transport from a dangerous situation to Bay Area Turning Point's shelter.

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.

League City is located in Galveston County which is part of the Balance of State CoC process. The Gulf Coast Homeless Coalition serves Galveston County and conducts the annual Point In Tim (PIT) homeless enumeration. The PIT Count covers Galveston County but most of the efforts are within the City of Galveston and Texas City and the survey results are not provided by location. The 2019 PIT Count found 386 individuals experiencing homelessness in Galveston County, with 196 sheltered being surveyed, 102 unsheltered being surveyed, and 88 being counted only by observation. The majority are male, white and without children. The City of League City does assist Bay Area Turning Point as it addresses homelessness among victims of domestic violence and sexual assault. Each time that Bay Area Turning Point has applied for CDBG funds, the City has provided funding. The League City Police Department works closely with Bay Area Turning Point in serving victims of domestic violence, including homeless individuals and families.

Bay Area Turning Point (BATP) provides information, crisis intervention and shelter to an average of 300 League City victims of domestic abuse or sexual assault each year. The Resource & Crisis Center of Galveston County is located in League City to promote safety and well-being for victims of family violence, sexual assault and child abuse. Family Promise of Clear Creek, a collaborative of area churches, provides overnight lodging and meals to on average 25 homeless families each year at the 17 host churches.

Additionally, the City funds Communities in Schools which provides counseling and support services to low-income children and their families, including unaccompanied youth and homeless families. Approximately 12% of the CDBG-funded students in PY 2019 were homeless, and a growing number are being precariously housed due to COVID-19 and potentially becoming homeless when rent deferments end. Communities in Schools will step in to provide referrals to the families and services to the children. Interfaith Caring Ministries receives League City CDBG funding for emergency rent/utility assistance and their food pantry. The City has allocated 90% of its PY 2020 CDBG-CV funds to ICM for rent/utility assistance for those affected by COVID-19. They also provide prescription assistance for low-

income, particularly elderly, residents to cease having to choose between prescription medications and housing.

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

The City does not receive ESG funds and relies on the Gulf Coast Homeless Coalition to coordinate and consult with the Texas Homeless Network that leads the Balance of State program. The nearest Participating Jurisdictions that receive ESG funding are the City of Houston, Harris County and Brazoria County. Because League City is an Entitlement Jurisdiction, the portions of the city inside Harris County are ineligible for County HOME or ESG assistance. The Gulf Coast Homeless Coalition conducts the Point In Time count but does not delineate specific locations outside of the City of Galveston. The City is available to assist with the Point In Time count within the city limits if needed and requested.

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

1	Agency/Group/Organization	SOUTHEAST TEXAS HOUSING FINANCE CORPORATION
	Agency/Group/Organization Type	Housing Services - Housing
	What section of the Plan was addressed by Consultation?	Housing Need Assessment
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Needs for owner occupied housing rehab and the potential for more support by SETH
2	Agency/Group/Organization	HARRIS COUNTY HOUSING AUTHORITY
	Agency/Group/Organization Type	Public Housing Authority
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Public Housing Needs

	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Direct interview to determine if any Housing Choice Voucher holders access League City rentals or have attempted to access unsuccessfully.
3	Agency/Group/Organization	HOUSTON-GALVESTON AREA COUNCIL
	Agency/Group/Organization Type	Housing Services-Elderly Persons Regional organization
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Transportation Disaster Recovery
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	The City coordinates with HGAC on a regular basis in many areas, particularly in the area of transportation, with the City's work in the Main St/Park Ave area; and, in disaster recovery as a result of FEMA and CDBG-DR plans for recovery from Hurricane Harvey. Anticipated outcomes for information and coordination were met.
4	Agency/Group/Organization	INTERFAITH CARING MINISTRIES
	Agency/Group/Organization Type	Services – Housing Services – food and prescription assistance
	What section of the Plan was addressed by Consultation?	Food, Rent/Utility and prescription needs for LMI
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	The agency receives CDBG funding and coordinates/collaborates with the city on an on-going basis. The agency provides rent/utility assistance, food assistance, and prescription assistance to residents. The consultation included ways in which both the agency and the City can better serve the very low- and extremely low-income residents. The anticipated outcome was met.
5	Agency/Group/Organization	COMMUNITIES IN SCHOOLS
	Agency/Group/Organization Type	Services-Children
	What section of the Plan was addressed by Consultation?	Homeless Needs - Families with children Public service needs of children

		T
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	The agency has provided information on the number and needs of homeless children attending League City middle and high schools as well as the general needs of LMI youth and their families. Anticipated outcomes were met.
	Agency/Group/Organization	CLEAR CREEK ISD
	Agency/Group/Organization Type	School District
	What section of the Plan was addressed by Consultation?	Homeless Needs - Families with children Public service needs of children, particularly mental health needs
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	During the application process, the CCISD provided information to the City on the needs of at-risk children, particularly elementary school children who don't have access to Communities in Schools, and especially in the wake of COVID-19
8	Agency/Group/Organization	BAY AREA TURNING POINT
	Agency/Group/Organization Type	Domestic Violence Homeless
	What section of the Plan was addressed by Consultation?	Homeless
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	During the application process, Bay Area Turning Point provided information on the current conditions and needs of victims of domestic violence or sexual assault and the growing urgency due to COVID-19's stay at home order
7	Agency/Group/Organization	TEXAS GENERAL LAND OFFICE
	Agency/Group/Organization Type	Other government - State
	What section of the Plan was addressed by Consultation?	CDBG-eligible Disaster Recovery needs and activities

Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination? The City has been in direct communication with GLO regarding the City's overall needs and CDBG-eligible needs to recover from Hurricane Harvey. GLO has been providing information and guidance regarding disaster recovery and hazard mitigation. Anticipated outcome for information was met. Anticipated outcome for funding has not yet been realized – pending approval of City's plans.



Table 2 – Agencies, groups, organizations who participated

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

Annually, the City consults with those agencies which are serving the low- to moderate-income populations city-wide and those stakeholders in the Main Street/Park Avenue CDBG Target Area. Most of the agencies serving special needs populations and the homeless in the region are located in Houston, Galveston or Pasadena and do not serve or track League City clientele specifically. There are very limited resources in League City, other than Interfaith Caring Ministries, for the very low-income and those precariously housed. Likewise, the area-wide advocacy groups for protected classes serve a much broader geographic region and did not have offices in League City nor information specific to League City. What little information they can provide is in the 2017-2021 Fair Housing 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?
2020-2024 Comprehensive Economic	Gulf Coast Economic Development District	The goal of economic development and
Development Strategy		enhancing job readiness overlaps with the
		2020-2024 Comprehensive Economic
		Development Strategy
Fair Housing Equity Assessment	Houston-Galveston Area Council	The goals of increasing affordable housing and
		ensuring fair housing overlap with the Fair
		Housing Equity Assessment
HGAC Pedestrian-Bicyclist Counting and	Texas A&M Transportation Institute	Trail demand particularly around League Park
Demand Study		in the primary CDBG Target Area
Galveston County Multi-Jurisdiction Hazard	Galveston County Office of Emergency	The goals and strategies outlined in this plan
Mitigation Plan	Management	help to frame the hazard mitigation and
		prevention goals of the City and the CDBG
		Strategic Plan

Table 3 – Other local / regional / federal planning efforts

Narrative (optional)

Because League City is a rapidly growing city between Houston, Pasadena and Texas City which have older housing and greater pockets of poverty and need, there is not a clientele base for housing and social service agencies to feasibly locate in the city. Public and private funding is concentrated on services in the larger and older communities of Houston, Baytown, Pasadena, Texas City, and Galveston. The size of the City's CDBG grant, coupled with the 15% limit on public service funding, keeps strong housing and public service programs from locating and securing HUD funding in League City. Likewise, of the few public service agencies that are located in the city, even fewer have the capacity or desire to manage federal funds.

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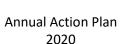


AP-12 Participation – 91.105, 91.200(c)

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

League City encouraged public participation through public meetings and public hearings for the CDBG program and the non-CDBG-funded activities in the primary CDBG Target Area – the Main Street/Park Avenue area. The development of the overall improvement plan was centered around a number of public meetings, stakeholder meetings, and consultations with professional planning and engineering consultants. Within the scope of the Main Street improvement plan is the CDBG infrastructure and facility focus. Specific to CDBG funding in the area, the City conducted extensive activities in 2017 during the development of the PY 2017-2021 Consolidated Plan. For the PY 2019 Annual Action Plan, the City hosted two public hearings, both advertised in the general circulation newspaper, on the City's website, and at the City Hall bulletin board. Additionally, the 30-day public comment period was advertised in a like manner. The City Council agendas are posted online and at City Hall at least 72 hours before the meeting. The agenda item for the approval of the Annual Action Plan was included in the agenda items, giving interested parties the opportunity to attend the meeting and voice their concerns or opinions prior to the vote. The City is striving to include more CDBG information and solicit more resident participation through its municipal access channel.

Citizen Participation Outreach



Sort Order	Mode of	Target of	Summary of	Summary of	Summary of comments	URL (if
	Outreach	Outreach	response/attendance	comments received	not accepted and	<mark>applicable)</mark>
					<u>reasons</u>	
1	Public Hearing	Non- targeted/broad community	7 attended	No comments were made	No comments were made, therefore not applicable	
2	Public Hearing	Non- targeted/broad community	A second public hearing had XX attendees.			
<mark>3</mark>	Newspaper Ad					
4	Internet Outreach					
5	Other/City Council Meeting					
6	Public Comment Period					
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Table 4 – Citizen Participation Outreach

Expected Resources

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

Introduction

The City will utilize its \$450,318 grant funds for PY 2020 to address the public service and infrastructure needs in the community. The PY 2020 CDBG-CV funds to address the affects of COVID-19 will dovetail with the general CDBG funds to augment the emergency rent and utility assistance program for those affected by COVID-19. The PY 2019 League Park parking lot project with continue in PY 2020 utilizing allocated PY 2019 funds. Unexpended public service and administration funds from PY 2019 will carry over to PY 2020 and be reallocated to the infrastructure project.

Anticipated Resources

Program	Source	Uses of Funds	Expecte	Expected Amount Available Year 1		Expected	Narrative	
	of		Annual	Program	Prior Year	Total:	Amount	Description
	Funds		Allocation:	Income:	Resources:	<mark>\$</mark>	Available	
			\$	\$	<mark>\$</mark>		Remainder	
							of ConPlan	
							\$	
CDBG	Public-	Admin and	\$450,318	\$0			\$450,000	
	Federal	Planning						
		Public Services						
		Public						
		Improvements						

Table 5 - Expected Resources - Priority Table

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

There is no matching fund requirement for the CDBG program. However, the City utilizes local funding to cover the majority of the costs for infrastructure and facility projects in the CDBG Target Area. CDBG funds generally leverage local funds at a ratio of 1:3 for CDBG-based activities. Communities in Schools uses CDBG funds to leverage approximately \$3.50 in other funds for every CDBG dollar for CDBG-served and CDBG-eligible clients. Interfaith Caring Ministries provides approximately \$4 for every \$1 in CDBG funds for its CDBG-eligible food pantry clients. Interfaith Caring Ministries utilizes other grants to provide emergency rent and utility assistance to approximately twice as many CDBG-eligible clients as CDBG-funding permits. However, ICM expects that the PY 2020 CDBG-CV funds that they have been awarded

will cover approximately 75% of the COVID-19 related need. Clear Creek ISD will be utilizing the CDBG grant to cover the cost for therapeutic services for 14 of the roughly 40 League City students that are in need of services. They are seeking other funding for services to the remaining 26 CDBG-eligible children.

Note: The above paragraph is in the eCon/IDIS version, however it does not appear in the downloaded version.

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

No publicly owned land or property will be used to address the needs identified in the plan.

Discussion

League City will expend its regulatory limit of 15% for public services, the regulatory limit of 20% for program administration and the remainder will be used to supplement the Third Street repaving project or cover additional costs of the League Park parking lots, without supplanting other funds.



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	3 rd Street Repaving	2017	2021	Non-Housing Community Development	Main St/Park Ave	Infrastructure Improvements	\$292,708	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 1,795 Persons Assisted
2	Youth Service	2017	2021	Non-Housing Community Development		Youth Services	\$30,000	Public service activities other than Low/Moderate Income Housing Benefit: 60 Persons Assisted
3	Youth Service	2017	2021	Non-Housing Community Development		Youth Services	\$7,882	Public service activities other than Low/Moderate Income Housing Benefit: 14 Persons Assisted
4	Subsistence Payments	2017	2021	Non-Housing Community Development		Subsistence Payments	\$24,000	Public service activities other than Low/Moderate Income Housing Benefit: 40 Persons Assisted
5	Food Banks	2017	2021	Non-Housing Community Development		Food Banks	\$5,664	Public service activities other than Low/Moderate Income Housing Benefit: 500 Persons Assisted

Table 6 – Goals Summary

Goal Descriptions

1	Goal Name	Street Repaving/Reconstruction
	Goal Description	The City will use CDBG funds to leverage general funds for the repaving/reconstruction of a portion of 3 rd Street.
2	Goal Name	Youth Service
	Goal Description	The City will fund Communities in Schools Bay Area to provide counselors in three schools who will assist at risk youth and their families. This program addresses risky behaviors, drop-out risks, and social service needs.
3	Goal Name	Youth Service
	Goal Description	The City will fund Clear Creek ISD to provide a contract counselor in an elementary school who will assist at risk youth and their families. This program addresses risky behaviors, drop-out risks, and social service needs.
4	Goal Name	Subsistence Payments
	Goal Description	The City will fund Interfaith Caring Ministries to provide emergency rent and/or utility payments on a one-time basis to families at risk of eviction or unsafe living conditions due to lack of water or power.
5	5 Goal Name Food Pantry	
	Goal Description	The City will fund Interfaith Caring Ministries to manage the food pantry that provides food to low-income families in need. They also deliver the food on a monthly basis to home-bound seniors and disabled.

Projects

AP-35 Projects – 91.220(d)

Introduction

Projects

#	Project Name						
1	3 rd Street Repaving						
2	Communities in Schools						
3 Clear Creek ISD Counselin							
4	ICM Rent & Utility Assistance						
5	ICM Food Pantry						

Table 7 - Project Information

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

The City is allocating public service funds to all public service agencies that applied for CDBG funding. Traditionally, the City has allocated funds for every eligible public service project for which agencies apply.

The City focuses its area-based activities in the Main St/Park Ave Target Area because: 1) it is the oldest area of the city with the greatest need; 2) it has the second highest percent of low-to moderate-income households in the city; and, 3) it is located in the Main Street Improvement Area where much of the capital improvements are focused. Using CDBG to leverage general funds, the impact of improvements in the area can be maximized.

The repaving/reconstruction of 3rd Street has been determined as the most advantageous for PY 2020 as it is a lateral street paralleling Main Street, 2nd Street and Coryell Street extending from League Park east. There are three options for traffic that must be diverted during reconstruction, easing the congestion and the inconvenience.

AP-38 Project Summary

Project Summary Information

1	Project Name	3 rd Street Repaving
	Target Area	Main St/Park Ave
	Goals Supported	Street Improvements
	Needs Addressed	Street Improvements/Mobility
	Funding	CDBG: \$292,708
	Description	Repaving/reconstruction of 3 rd Street from N. Wisconsin Ave to Alabama Ave
	Target Date	9/30/2021
	Estimate the number and type of families that will benefit from the proposed activities	1,795 people, 43.18% of the households are low- to moderate-income. League City's LMA exception is 37.73%.
	Location Description	Census Tract 721300, Block Group 3. Main St./Park Ave Target Area north of Main St, between N. Wisconsin Ave and Alabama Ave.
	Planned Activities	To mill and repave 3 rd Street to improve east/west vehicular and pedestrian mobility
2	Project Name	Communities in Schools
	Target Area	
	Goals Supported	Youth Service
	Needs Addressed	Youth Services
	Funding	CDBG: \$30,000

Description	Provide funding for partial salaries for 3 counselors, 1 in each of 3 schools to provide counseling to 60 at risk youth and their families.
Target Date	9/30/2021
Estimate the number and type of families that will benefit from the proposed activities	An estimated 60 unduplicated youth in 40 families will benefits
Location Description	City-wide services. The activities will take place in 3 schools at the following locations: 4380 Village Way (Bayside Intermediate); 2451 E. Main (Clear Creek Intermediate) & 2305 E. Main (Clear Creek High School)
Planned Activities	Provide partial funding for counselors in three League City schools to counsel with at risk youth and their families to reduce drop-out rates, improve school performance and link them to other resources they may need
Project Name	CCISD Counseling
Target Area	
Goals Supported	Youth Service
Needs Addressed	Youth Services
Funding	CDBG: \$7,883
Description	Provide partial funding for a contract counselor to provide counseling to 14 at risk youth and their families.
Target Date	9/30/2021
Estimate the number and type of families that will benefit from the proposed activities	An estimated 14 unduplicated youth in 10 families will benefits

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	Location Description	City-wide services. The activities will take place in various Clear Creek ISD elementary schools. CCISD offices are located at 2425 East Main St., League City
	Planned Activities	Provide partial funding for counselors in three League City schools to counsel with at risk youth and their families to reduce drop-out rates, improve school performance and link them to other resources they may need
4	Project Name	ICM Rent/Utility Assistance
	Target Area	
	Goals Supported	Subsistence Payments
	Needs Addressed	Subsistence Payments
	Funding	CDBG: \$24,000
	Description	Provide funding for one-time rent and/or utility assistance to households at risk of eviction or losing their water or power.
	Target Date	9/30/2021
	Estimate the number and type of families that will benefit from the proposed activities	20 families or households, including 40 persons who are low- to moderate-income.
	Location Description	City-wide services with client intake/approval and fund disbursement at Interfaith Caring Ministries, located at 151 Park Ave.
	Planned Activities	The City will provide funds to Interfaith Caring Ministries to pay rent and/or utilities on a one-time emergency basis for up to 3 consecutive months to households at risk of eviction or loss of power or water.
5	Project Name	ICM Food Pantry
	Target Area	
	Goals Supported	Food Pantry

	Needs Addressed	Food Bank
	Funding	CDBG: \$5,664
	Description	The City will provide funds to support part of the salary of the manager that provides direct services to the program participants and for transportation costs for the delivery of food boxes to home-bound elderly
	Target Date	9/30/2021
	Estimate the number and type of families that will benefit from the proposed activities	Approximately 500 persons in 200 families or households will benefit. These will include families and individuals, especially the elderly and disabled.
	Location Description	City wide services from the food pantry located at 149 Park Ave and via delivery to home-bound elderly
	Planned Activities	The City will fund part of the salary of Interfaith Caring Ministry's food pantry manager, who is the person directly serving the clientele. In addition, the funds will support the transportation costs for delivering the food boxes to home-bound elderly or disabled clients who cannot pick up their food in person.
5	Project Name	Program Administration
	Target Area	
	Goals Supported	
	Needs Addressed	Management
	Funding	\$90,064
	Description	Provide Program Administration for CDBG
	Target Date	09/30/2021
	Estimate the number and type of families that will benefit from the proposed activities	Not Applicable

Location Description	City wide services located at 500 W Walker, League City TX
Planned Activities	Manage the CDBG program through planning and administration of activities.



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

Geographic Distribution

Target Area	Percentage of Funds	

Table 8 - Geographic Distribution

Rationale for the priorities for allocating investments geographically

Discussion

Affordable Housing

AP-55 Affordable Housing - 91.220(g)

Introduction

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

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

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

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

Discussion

At this time the City has no capacity to use CDBG funds to provide rental assistance, produce new housing units, acquire units, or rehabilitate existing units. The City will fund Interfaith Caring Ministries for emergency rent/utility assistance which is classified as a subsistence assistance – public service – not a housing activity as it is a one-time assistance.

AP-60 Public Housing – 91.220(h)

Introduction

There is no public housing in League City. Harris County does have Section 8 Housing Choice Vouchers and a small corner of League City is in Harris County. However, that corner, though it does have rental properties, none for which Housing Choice Voucher holders have sought to lease through Harris County Public Housing Authority. Pasadena and Texas City also have a public housing authority, but none of their voucher holders have accessed housing in League City.

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

Without a public housing authority, there are no plans that can be made or implemented to address then needs to public housing.

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

Not applicable

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

Not applicable

Discussion

There is no public housing authority serving League City.

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

The area encompassed by the Gulf Coast Coalition for the Homeless includes League City, but to date the Point in Time and other data collection efforts have either excluded League City or has not been geocoded to the municipal level. Bay Area Turning Point (BATP) provides information, crisis intervention and shelter to an average of 300 League City victims of domestic abuse or sexual assault each year. The Resource & Crisis Center of Galveston County is located in League City to promote safety and well-being for victims of family violence, sexual assault and child abuse. Family Promise of Clear Creek, a collaborative of area churches, provides overnight lodging and meals to on average 25 homeless families each year at the 17 host churches. . Bridge Over Troubled Waters, though in Pasadena, does serve League City residents who are victims of domestic violence and sexual assault. Though the homeless count for Galveston County is predominately male individuals rather than females or families, there are no shelters or services in the area to serve singles or those who are not victims of domestic or sexual violence. There are no other shelters or service providers in League City or that provide services and shelter to League City residents. BATP opted to not apply for funds for in recent years due to the limited dollars available through CDBG for such a high-cost program. No other agencies serving League City's homeless individuals or families have requested local CDBG funds. The City's Police Department continues to work closely with BATP through other funding to protect victims and potential victims, provide transportation to the shelter, and educate the public on domestic violence and sexual assault issues and the resources available for those who become homeless as a result of a violent situation.

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

League City's one-year goals include reaching out to the Coalition for the Homeless to request that the 2021 PIT includes a count in League City and provide city-specific information. In addition, the City will continue to reach out to Bay Area Turning Point and will reach out to the Resource & Crisis Center of Galveston County and Family Promise of Clear Creek to encourage all three to apply for PY 2021 CDBG funds and any future rounds of CDBG-CV funding.

Addressing the emergency shelter and transitional housing needs of homeless persons

Though the Coalition for the Homeless of Galveston County indicates that nearly twice as many

males are homeless than females and that only 38 households are families (37 with children), Bay Area Turning Point and Resource & Crisis Center of Galveston County provide services and shelter only for victims of domestic violence and sexual assault, while Family Promise only serves families. As a result, there is a need for emergency shelter, transitional housing, and rapid rehousing for single males and females who have not victims of violence and assault. Family Promise cannot accommodate all of the applicant families because of limited resources and/or criminal history of the applicants.

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

None of the programs in and around League City serve chronically homeless and unaccompanied youth. There are no rapid rehousing programs in the League City area. Non-chronically homeless who are victims of domestic violence and/or sexual assault, including families, are able to access shelter and services to aid in moving them to independent housing. Family Promise provides shelter and services to help move families who are experiencing a short single episode of homelessness due to a health or economic crisis. The goal is to rapidly move them back to housing and self-sufficiency.

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 funds Interfaith Caring Ministry utilizes CDBG funding to provide emergency rent and/or utility assistance to households who are facing eviction or service termination. Due to the limited available funding, ICM has opted to provide only one month of assistance per year to its clientele. However, due to the effects of COVID-19 and the landlords who deferred, but didn't waive rents, for two to three months, the City and ICM have agreed to provide assistance for up to three consecutive months – the limit allowed by the HUD regulations (24 CFR 570.207(b)(4).

Discussion

The homeless services and shelters serving League City are only for those who are victims of domestic (family) violence or sexual assault or are families who are homeless for a short time due to a crisis such as a health issue, sudden unemployment, or displacement. Those who do not fit either criteria have no access to local services or shelter and must go to Houston, Pasadena, Galveston, or Texas City for assistance.

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

Introduction:

All low- to moderate-income households face impediments in accessing affordable housing and housing in choice locations, particularly in fast-growing cities with fewer low- to moderate-income households. This is especially true for elderly and disabled individuals and large families. The limited stock of the housing within a price range affordable to the low- to moderate-income is, for the most part, older housing that has not been retrofitted for ADA compliance and accessibility to the physically disabled and/or may not meet Housing Quality Standards as set forth by HUD. The League City rental market, while relatively new, is lacking sufficient units with more than three bedrooms for large families, and is not affordable to most lower-income households. Many middle-income residents are living in units well below their affordability limits, pushing the lower-income residents to higher-cost housing that is out of their affordability level.

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

The City will not be using CDBG funds directly to ameliorate the barriers to affordable housing. There is a shortage of funding to address the housing needs in the community, particularly the barriers to affordable housing. The City does review and, when appropriate, support the development of Low Income Housing Tax Credit (LIHTC) properties and other properties for low-income residents. Additionally, because the greatest percent of low-income residents fall into one or more of the Fair Housing Act protected classes, the City does provide a level of assistance by maintaining a Fair Housing Officer, funded through CDBG Administration funds. Generally, the City's policies to not hamper the development of affordable housing and it does review and indicate to the state its approval for all viable LIHTC applications. At this time 4 properties have been approved by the state and 2 are operational. The Main Street Redevelopment Plan includes the possibility of mixed-use development and the improvements being made with CDBG and other funds will encourage developers to include mixed income housing in the area.

Housing affordability is a two-pronged issue – housing cost and household income. One way the City's public policies are addressing the barriers to affordable housing is through economic development activities that help nurture local small businesses and bring new larger businesses

to town to improve the job market and incomes of those who currently cannot afford the housing stock in the area. Currently, there are four tax increment financing zones in League City which support commercial development and bring new job opportunities to the city.

Discussion:

Housing affordability is determined by housing cost and household income. Both are elements of private enterprise, especially without a public housing authority in League City. The City does not put undue restrictions on developers that would price their properties out of affordability. The City does have an active economic development team that promotes new businesses and gives tax incentives to developers and businesses who choose to expand or location in League City. By fostering economic growth and job opportunities, the City is assisting in raising income levels so that more housing becomes affordable.

AP-85 Other Actions – 91.220(k)

Introduction:

Actions planned to address obstacles to meeting underserved needs

The City coordinated the creation of the Main Street Redevelopment area with the Main St/Park Ave CDBG focus area in order to blend a number of funding sources to create sufficient leverage to redevelop this older area of the city. The 5-year plan is to improve the roads, sidewalks, lighting, signalization, parks, historic area, commercial areas and housing with CDBG, general, and CIP funds. During PY 2018, the City began the major reconstruction and enhancement of Park Avenue using CIP and CDBG funds and will complete the project by the end of PY 2019. During PY 2019, the City began a major redevelopment and enhancement of League Park and is using CDBG funds for the expansion the parking for the park and surrounding commercial areas. During PY 2020, the City will undergo the repaving/reconstruction of 3rd Street in the Main St/Park Ave CDBG focus area to enhance east/west mobility.

Actions planned to foster and maintain affordable housing

The City will continue to reach out to Southeast Texas Housing Finance (SETH) for assistance in the rehabilitation of owner-occupied homes. The City and its homeowners are receiving significant financial assistance from Hurricane Harvey that struck in 2017. As is typical, the older areas and older homes received the greatest damage from Hurricane Harvey and subsequent unnamed storms. The City is currently determining the use of disaster recovery and hazard mitigation funds to improve the CDBG-eligible areas, including the Main Street/Park Avenue Target Area.

Interfaith Caring Ministries (ICM)uses League City CDBG funds to provide emergency rent and utility assistance to those facing eviction or service termination. The City allocated 90% of its CDBG-CV funding to the agency for addressing the need for rent and utility assistance as a result of COVID-19. Other CDBG funds will be utilized by ICM for low- to moderate-income households whose rents and utilities are in arrears due to their on-going income struggles, not related to COVID-19.

Actions planned to reduce lead-based paint hazards

At any time that the City conducts or supports the rehabilitation of housing built before 1978, it ensures that the structure is tested for Lead Based Paint (LBP) and that any remediation necessary is carried out. During this next year, the City will provide information to Clear Creek ISD, Interfaith Caring Ministries, and Communities In Schools-Bay Area about lead poisoning, testing, and ask them to share the information with their program participants to inform parents of dangers of lead in paint, toys, cookware, clothes of workers working around lead.

Actions planned to reduce the number of poverty-level families

League City's Economic Development Department will continue to facilitate the growth of a diverse and sustainable economic base, recruiting businesses that can increase the employment opportunities for all workers, including those who are currently at or below the poverty level. Various ranking systems have ranked League City as the 2nd fastest growing city in America, in the top 10 safest large cities by value, and the 7th best small city for families. The downtown revitalization efforts are encouraging small businesses to open and provide job opportunities for unskilled and skilled labor as it becomes more of a tourist attraction with retail and entertainment venues. Throughout League City, the City provides grants, loans, tax abatements, freeport property tax exemption, public improvement districts, municipal management districts, and industrial revenue bonds to promote economic development projects. The City can reduce the number of poverty-level families only through encouraging and supporting job growth through commercial and industrial developments.

Actions planned to develop institutional structure

One of the major plans that began in PY 2019, is the expansion of the City's capability to reach residents through social media and interactive virtual meetings. COVID-19 created an opportunity for the City to move to a more interactive method of reaching those who cannot or choose not to attend public meetings and public hearings. During PY 2021, the City will increase its capabilities for reaching the public even more as we develop the PY 2022 – 2026 Consolidated Plan. The City staff will continue to attend as many HUD trainings as possible and to participate in webinars and local HUD meetings. Additionally, staff will continue to interface with the HUD staff to receive assistance in addressing issues. During the contract negotiations and monitorings the City will continue to work with the subrecipients to ensure that they are not only complying with the regulations, but are developing their institutional structure to better address the needs of their clientele and to know to whom they can refer their program

participants. The expanded coordination between CDBG staff, other planning staff, and other departments involved in the Main Street activities will continue to develop a much more cohesive and stronger institutional structure.

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

At this time there are no public or private housing agencies serving League City. There is no Public Housing Authority in League City. The City has a good relationship with Bay Area Turning Point and, though BATP opted not to apply for PY 2020 funding, the City will continue to coordinate with them where possible. The City coordinates, to the extent possible, with SETH and UM Army, a ministry of the United Methodist Church, for the rehabilitation of owner-occupied housing. The City will work to coordinate with Gulf Coast Center, Family Promise and Resource & Crisis Center to encourage their participation in the CDBG program. The City will continue to coordinate with the current subrecipients in addressing the needs of the community. The activities in the Main Street/Park Avenue area will enhance the coordination and communication between City staff in all departments, the school district, Interfaith Caring Ministries, and Communities in Schools-Bay Area, that are located in the Target Area. The activities in the Target Area will also enhance coordination between the CDBG staff and the various commissions and committees such as the City's Historic Commission and the Bay Area Houston Transportation Partnership.

Discussion:

Given the few social service agencies and the lack of housing agencies in League City, and given the small CDBG allocation each year, the main activities that the City can undertake are to reach out to SETH and UM Army for assistance in rehabilitating owner-occupied homes and/or installing accessibility improvements; and, to continue to expand its coordination with social service agencies that serve League City residents.

Program Specific Requirements

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

Introduction:

The City has not funded activities that produce program income; and, opted to not secure a Section 108 Loan. We do not have any urban renewal settlements and there are no grant funds that were returned to the line of credit for several years. Additionally, we have no float-funded activities.

Note: This introduction was entered into eCon/IDIS and saved. However, periodically when opening AP-90, it has been eliminated and has been re-entered. The current downloaded version does not show the paragraph, but eCon/IDIS did show it at the time of submission.

Community Development Block Grant Program (CDBG) Reference 24 CFR 91.220(I)(1)

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

1. The total amount of program income that will have been received before	0
the start of the next program year and that has not yet been reprogrammed	
2. The amount of proceeds from section 108 loan guarantees that will be	0
used during the year to address the priority needs and specific objectives	
identified in the grantee's strategic plan	
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	0
planned use has not been included in a prior statement or plan.	
5. The amount of income from float-funded activities	0
Total Program Income	

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.

70.5%

Discussion:

NOTE: The following is in eCon Planning Suite and downloaded version, but the pre-populated title "Discussion:" does not appear in the downloaded document.

The City does not conduct any CDBG activities that result in program income and has not received Section 108 loan guarantee funds. The urgent need activities are a result of Hurricane Harvey and COVID-19 will continue to be funded through State disaster recovery and CDBG-CV funds. All public service allocations benefit low- to moderate-income persons. All CDBG non-public service and non-administration funds are expended within the Main St/Park Ave CDBG area, which houses the majority of the low- to moderate-income residents in the City.