

Expected Resources

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

Introduction

League City only receives CDBG funds from HUD, but has submitted its application for a Section 108 loan to be able to aggregate anticipated funding to complete projects outlined in this plan.

Anticipated Resources

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 2				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
CDBG	public - federal	Acquisition Admin and Planning Economic Development Housing Public Improvements Public Services	375,169	0	30,530	405,699	1,050,000	This is the 2 nd year of the Con Plan, and it is estimated that the City will receive approximately \$350,000 annually for the next 3 years. The \$30,530 represents \$5,530 unspent from AnchorPoint's allocation and \$25,000 estimated to not be spent from Administration.
Section 108	public - local	Public Improvements	1,678,760	0	0	1,678,760	0	The City has applied for a Section 108 loan to revitalize the Main St/Park Ave Target Area

Table 1 - Expected Resources – Priority Table

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

There is no matching requirement for the CDBG funds. The City will utilize the Section 108 loan, Capital Improvement Program (CIP) funds, and general funds, to merge with the CDBG allocation for the improvements in the area.

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

League Park will be the primary property used to address the needs identified in the plan. Other parks, such as Mustang Park, Helen’s Garden, and Heritage Park are in our primary Target Area and will serve the residents and address the needs identified in the Consolidated Plan.

Discussion

Through substantial analysis and public input, the City has determined that the area of greatest need and potential is the Main Street/Park Avenue area comprised of two CDBG-eligible block groups which have the highest percentage of low- to moderate-income residents of any block group in the city. As a result, all of our CDBG resources, outside of public service and administration funds will be focused in this area. We will primarily be using the funds for addressing the vehicular and pedestrian mobility needs of the area.

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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	Street Improvements	2017	2021	Non-Housing Community Development	Main St/Park Ave Target Area	Street Improvements Storm Water Drainage	CDBG: \$274,391 Section 108: \$1,678,160	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 2549 Persons Assisted
2	Youth Service	2017	2021	Non-Housing Community Development	City-wide	Youth Services	CDBG: \$16,000	Public service activities other than Low/Moderate Income Housing Benefit: 40 Persons Assisted
3	Subsistence Payments	2017	2021	Affordable Housing Non-Housing Community Development		Subsistence Payments	CDBG: \$30,075	Public service activities for Low/Moderate Income Housing Benefit: 50 Households Assisted
4	Food Pantry	2017	2021	Non-Housing Community Development		Food Bank	CDBG: \$10,200	Public service activities other than Low/Moderate Income Housing Benefit: 1200 Persons Assisted

Table 2 – Goals Summary

Goal Descriptions

1	Goal Name	Street Improvements
	Goal Description	The City will complete the resurfacing of Park Avenue, including the drainage improvements and adding on-street parking.
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	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 due to lack of water or power.
4	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

The City will be focusing its CDBG resources on completing the Park Avenue project and public services. The public services will assist at risk youth and their families, households at risk of homelessness, and individuals and families in need of food assistance.

Projects

#	Project Name
1	Park Avenue Resurfacing, Drainage, Parking
2	Communities in Schools
3	ICM Rent/Utility Assistance
4	ICM Food Pantry

Table 3 - Project Information

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

The reasons for the allocation priorities are 2-fold -- (1) need expressed in the community through studies, surveys, meetings, input from stakeholders and agencies, and staff discussions; (2) agencies that applied for public service funding. All agencies that applied are receiving funds. The shortage of funds to meet all the needs is the main obstacle to addressing underserved needs. A secondary obstacle is the lack of public service agencies in League City to address many of the underserved needs. The economies of scale and limited resources prevent many public service agencies from locating in higher-income suburban areas such as League City.

AP-38 Project Summary
Project Summary Information

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1	Project Name	Park Avenue Resurfacing, Drainage, Parking
	Target Area	Main St/Park Ave NRSA
	Goals Supported	Street Improvements
	Needs Addressed	Street Improvements
	Funding	CDBG: \$274, 391 Section 108: \$1,678,160
	Description	Complete the resurfacing of Park Avenue with drainage improvements and on-street angled parking
	Target Date	9/30/2019
	Estimate the number and type of families that will benefit from the proposed activities	2,549 people live in the NRSA served by Park Avenue.
	Location Description	The project is located in the Main St/Park Ave Target Area in CT/BG 721300/2 and 721300/3, east of SH 3, west of Egret Bay Blvd and extending north and south across Main from E. Walker to 3rd St.
	Planned Activities	Complete the resurfacing of Park Avenue, including adding drainage improvements and adding angled on-street parking on both sides of the street.
2	Project Name	Communities in Schools
	Target Area	
	Goals Supported	Youth Service
	Needs Addressed	Youth Services
	Funding	CDBG: \$16,000
	Description	Provide funding for partial salaries for 3 counselors, 1 in each of 3 schools to provide counseling to 45 at risk youth and their families.
	Target Date	9/30/2019
	Estimate the number and type of families that will benefit from the proposed activities	An estimated 45 unduplicated youth will benefits
	Location Description	City-wide

	Planned Activities	Provide partial funding for counselors in three League City schools to counsel with at risk youth and their families in order to reduce drop outs, improve school performance and link them to other resources they may need
3	Project Name	ICM Rent/Utility Assistance
	Target Area	
	Goals Supported	Subsistence Payments
	Needs Addressed	Subsistence Payments
	Funding	CDBG: \$30,075
	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	9/30/2018
	Estimate the number and type of families that will benefit from the proposed activities	130 households, including 371 persons who are low- to moderate-income.
	Location Description	City-wide
Planned Activities	The City will provide funds to ICM to pay rent and/or utilities on a one-time emergency basis to households at risk of eviction or loss of power or water.	
4	Project Name	ICM Food Pantry
	Target Area	
	Goals Supported	Food Pantry
	Needs Addressed	Food Bank
	Funding	CDBG: \$10,200
	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	9/30/2019
	Estimate the number and type of families that will benefit from the proposed activities	Approximately 1,250 persons in 600 households will benefit. These will include families and individuals, especially the elderly and disabled.

	Location Description	City-wide
	Planned Activities	The City will fund part of the salary of the 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.

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

All of the infrastructure improvements, including Park Avenue will be carried out in the Main St/Park Ave area, the city's core LMI CDBG target area (labeled below as the Main St/Park Ave NRSA. The City will not be continuing with the NRSA designation, however the area remains the same and remains the core target for area-based projects.

Geographic Distribution

Target Area	Percentage of Funds
Main St/Park Ave	85

Table 4 - Geographic Distribution

Rationale for the priorities for allocating investments geographically

This Park Ave project will improve pedestrian and vehicular mobility to the parks, commercial properties, the elementary school, ICM and other amenities; and provide additional parking at these locations. It will also improve safer and faster response by the fire department located on the north side of Main and accessing the south side via Park Avenue. Additionally, the enhancements to the drainage system to and along Park Avenue will reduce flooding and standing water.

Discussion

The Main St/Park Ave Area was established because it is the eligible CDBG in greatest need of concentrated infrastructure improvements, both for the liveability of the residents and for economic development purposes. This is in the oldest area of the city and the one with the most potential, but greatest overall need. Through a number of studies and public meetings, the Main Street Redevelopment Plan was created and the NRSA developed to dovetail and augment the planned activities. The City has since determined that the NRSA designation is not of sufficient benefit and that the CDBG Target Area designation can serve the purpose, the designation has been dropped. The City is investing significant CIP, and general funds into the area and will use the Section 108 loan to augment the CDBG funding. For the next 5 years it is anticipated that all of the infrastructure and public facility activities funded by CDBG or the Section 108 loan will be in this Target Area.

Affordable Housing

AP-55 Affordable Housing – 91.220(g)

Introduction

The City will fund ICM for emergency rent/utility assistance which is classified as a public service, not housing activity as it is a one-time/single month assistance.

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

Table 5 - 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 6 - 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 ICM for emergency rent/utility assistance which is classified as a public service, not housing activity as it is a one-time/single month assistance. **During PY 2017, Southeast Texas Housing Finance provided funds to rehabilitate one unit and retrofit another for accessibility. The City will request Southeast Texas Housing Finance to continue its rehab activities in League City. UM Army also conducts rehabilitation in the League City area using youth volunteers and licensed trades people. Requests will be made for UM Army to focus at least part of its efforts in the Main Street/Park Avenue area of the city.**

AP-60 Public Housing – 91.220(h)

Introduction

There is no public housing in League City. While Harris County does have Section 8 HCVs and a small corner of League City is in Harris County, that corner does not have rental properties.

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 the needs of 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 in League City.

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

Introduction

In the past, League City has funded Bay Area Turning Point to provide shelter and services to homeless victims of domestic violence or sexual assault. BATP opted to not apply for funds for PY 2017 or PY 2018 due to the uncertainty of the continuance of CDBG and the limited funds available for a high-maintenance program. No other agencies serve League City's homeless individuals or families.

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

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

The Gulf Coast Homeless Coalition conducts the annual Point In Time count in which they attempt to locate, reach out to, and enumerate the homeless in Liberty, Chambers, Galveston and Brazoria Counties. To date they have not located any homeless in League City. There are no programs or facilities to which to refer the homeless. The City funds Communities in Schools-Bay Area which provides counseling and referrals to homeless youth and their families. ICM provides one-time rental assistance as a stop-gap measure to prevent homelessness and provides food and other essentials to homeless individuals and families. Those coming to the food pantry are provided with information about other services in the area.

Addressing the emergency shelter and transitional housing needs of homeless persons

There are no agencies or programs in the area to address the needs of homeless persons, other than Bay Area Turning Point which addresses the needs of victims of domestic violence or sexual assault who find themselves homeless. The Bridge Over Troubled Waters, located in Pasadena north of League City is a family crisis center providing shelter to homeless families who are victims of domestic violence and sexual assault. Sarah's House, also in Pasadena, is a shelter for women and their children. Women and families seeking assistance are referred to one of these three shelters.

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 only program in the immediate area is BATP which provides shelter, social services, job training and assists in the transition from shelter to independent living. Gulf Coast Center does servewith its

Intellectual and Developmental Disability Services that focuses on service coordination. They assist their homeless program participants in securing shelter at their facility in Galveston or other accessible appropriate facilities.

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.

ICM provides once-a-year emergency rent and utility assistance to prevent homelessness. ICM's food pantry, which includes the delivery of bags of food to home-bound elderly and disabled, assists in preventing homeless by eliminating a family's need to choose between food and shelter. Other social services, such as Meals on Wheels, provide hot home-delivered meals to the elderly which improves their ability to remain in their home and not move to assisted living or become homeless.

Discussion

There are no shelters or specific programs for the general homeless population in League City. BATH provides comprehensive shelter, transitional living, and services through a continuity of care to victims of domestic violence or sexual assault. Likewise, The Bridge Over Troubled Waters, which serves Pasadena but will accept League City clients, provides shelter and services to victims of domestic violence and sexual assault. Sarah's House in Pasadena serves Pasadena women and families but, when space allows, will accept League City single women and women with children. ICM provides emergency one-time rent/utility assistance to help prevent homelessness and counsels those recipient families to access other funds. ICM also is the primary food bank in the city.

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

Introduction:

All low- to moderate-income households, regardless of their protected-class status under the Fair Housing Act, face impediments in accessing affordable housing and housing in choice locations. This is often 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 rental market, while relatively new, is lacking sufficient units with more than three bedrooms for large families. 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 to ameliorate the barriers to affordable housing. Generally the City's policies to not hamper the development of affordable housing and it does review and approve to the state all viable applications for LIHTCs. At this time 4 properties have been approved by the state and 2 are operational. -The Main Street Redevelopment Plan includes mixed use development and the improvements being made with CDBG and other funds will encourage developers to include mixed income housing in the area.

Discussion:

The City will be focusing this year and the next 3 years on substantial improvements in the Main Street/Park Avenue CDBG Target Area. This will create a viable market for in-fill mixed income housing and for mixed use developments that can include affordable housing. While the City acknowledges that there always will be a need for housing affordable to the low- to moderate-income, the economies of scale are not such for developers to ensure that there are sufficient numbers of potential renters/buyers in the area for developing such housing in new subdivisions or apartment complexes. As a result, the City will be focusing its efforts in providing incentives and encouragement for mixed use developments with mixed income housing in the Main Street Redevelopment Area west of SH 3.

AP-85 Other Actions – 91.220(k)

Introduction:

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, CIP, and Section 108 funds. During PY 2018, the City will use CDBG, CIP, and Section 108 funds complete the Park Avenue resurfacing, drainage, and parking project and will begin other infrastructure projects in the area.

Actions planned to address obstacles to meeting underserved needs

The City staff will continue to reach out to agencies that can provide needed services to the community. In PY 2017, the City received a grant from the Southeast Texas Housing Finance (SETH) to rehabilitate an owner-occupied house and provide accessibility retrofits to a home owned by a disabled veteran. The plans are to reach out to SETH for additional assistance. Hurricane Harvey did considerable damage to League City in August 2017, and the City will receive disaster recovery and hazard mitigation funds to repair the damage and rectify the problems that allowed the damage to occur. HUD has not determined the level of CDBG-DR funds, if any, the City will receive.

Actions planned to foster and maintain affordable housing

The City plans to request more assistance from SETH and UM Army to rehabilitate owner-occupied housing that will assist in maintaining the quality and safety of affordable owner-occupied housing.

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 LBP and that any remediation necessary is carried out. During this next year, the City will provide information to CCISD, ICM, and CIS-BA 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 Corporation 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 within the city. 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

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. The City has a good relationship with Bay Area Turning Point and, though BATP opted not to apply for PY 2018 funding, the City will continue to coordinate with them where possible. Currently the City is coordinating with SETH and UM Army for the rehabilitation of owner-occupied housing. The City will work to coordinate with Gulf Coast Center, which has recently opened offices in League City. 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, ICM, CIS-BA, and Gulf Coast Center 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:

The main activities that the City can accomplish, given the shortage of support agencies, is to work with SETH and UM Army to rehabilitate more homes; continue and expand its coordination with the social service agencies that do serve the city; and to aggressively work to complete the Main Street/Downtown redevelopment that will not only improve the amenities in the Main Street Target Area but will provide significant business and employment opportunities to help raise skilled and unskilled workers out of poverty.

Program Specific Requirements

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

Introduction:

The City will receive no program income and will receive approximately a \$1,678,160 Section 108 loan, of which approximately \$335,682 will be expended in PY 2017. No other funds are applicable.

Community Development Block Grant Program (CDBG)

Reference 24 CFR 91.220(I)(1)

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

1. The total amount of program income that will have been received before the start of the next program year and that has not yet been reprogrammed	0
2. The amount of proceeds from section 108 loan guarantees that will be used during the year to address the priority needs and specific objectives identified in the grantee's strategic plan.	1,678,160
3. The amount of surplus funds from urban renewal settlements	0
4. The amount of any grant funds returned to the line of credit for which the planned use has not been included in a prior statement or plan	0
5. The amount of income from float-funded activities	0
Total Program Income:	1,678,160

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.	78.35%

Housing Trust Fund (HTF)
Reference 24 CFR 91.220(I)(5)

1. Distribution of Funds

- a. Describe the eligibility requirements for recipients of HTF funds (as defined in 24 CFR § 93.2).

- b. Describe the jurisdiction's application requirements for eligible recipients to apply for HTF funds.

- c. Describe the selection criteria that the jurisdiction will use to select applications submitted by eligible recipients.

- d. Describe the jurisdiction's required priority for funding based on geographic distribution, which is a description of the geographic areas of the State (including areas of low-income and minority concentration) in which it will direct assistance during the ensuing program year.

- e. Describe the jurisdiction's required priority for funding based on the applicant's ability to obligate HTF funds and undertake eligible activities in a timely manner.

- f. Describe the jurisdiction's required priority for funding based on the extent to which rents for units in the rental project are affordable to extremely low-income families.

- g. Describe the jurisdiction's required priority for funding based on the financial feasibility of the project beyond the required 30-year period.

- h. Describe the jurisdiction's required priority for funding based on the merits of the application in meeting the priority housing needs of the jurisdiction (such as housing that is accessible to transit or employment centers, housing that includes green building and sustainable development features, or housing that serves special needs populations).

i. Describe the jurisdiction's required priority for funding based on the location of existing affordable housing.

j. Describe the jurisdiction's required priority for funding based on the extent to which the application makes use of non-federal funding sources.

2. Does the jurisdiction's application require the applicant to include a description of the eligible activities to be conducted with HTF funds?

3. Does the jurisdiction's application require that each eligible recipient certify that housing units assisted with HTF funds will comply with HTF requirements?

4. Performance Goals and Benchmarks. The jurisdiction has met the requirement to provide for performance goals, consistent with the jurisdiction's goals established under 24 CFR 91.215(b)(2), by including HTF in its housing goals in the housing table on the SP-45 Goals and AP-20 Annual Goals and Objectives screens.

5. Rehabilitation Standards. The jurisdiction must establish rehabilitation standards for all HTF-assisted housing rehabilitation activities that set forth the requirements that the housing must meet upon project completion. The jurisdiction's description of its standards must be in sufficient detail to determine the required rehabilitation work including methods and materials. The standards may refer to applicable codes or they may establish requirements that exceed the minimum requirements of the codes. The jurisdiction must attach its rehabilitation standards below. If the jurisdiction will not use HTF funds for the rehabilitation of housing, enter "N/A".

In addition, the rehabilitation standards must address each of the following: health and safety; major systems; lead-based paint; accessibility; disaster mitigation (where relevant); state and local codes, ordinances, and zoning requirements; Uniform Physical Condition Standards; and Capital Needs Assessments (if applicable).

6. Resale or Recapture Guidelines. Below, the jurisdiction must enter (or attach) a description of the guidelines that will be used for resale or recapture of HTF funds when used to assist first-time homebuyers. If the jurisdiction will not use HTF funds to assist first-time homebuyers, enter "N/A".

7. HTF Affordable Homeownership Limits. If the jurisdiction intends to use HTF funds for homebuyer assistance and does not use the HTF affordable homeownership limits for the area provided by HUD, it must determine 95 percent of the median area purchase price and set forth the information in accordance with §93.305. If the jurisdiction will not use HTF funds to assist first-time homebuyers, enter “N/A”.

8. Limited Beneficiaries or Preferences. Describe how the jurisdiction will limit the beneficiaries or give preferences to a particular segment of the extremely low- or very low-income population to serve unmet needs identified in its consolidated plan or annual action plan. If the jurisdiction will not limit the beneficiaries or give preferences to a particular segment of the extremely low- or very low-income population, enter “N/A.”

Any limitation or preference must not violate nondiscrimination requirements in § 93.350, and the jurisdiction must not limit or give preferences to students. The jurisdiction may permit rental housing owners to limit tenants or give a preference in accordance with § 93.303 only if such limitation or preference is described in the action plan.

9. Refinancing of Existing Debt. Enter or attach the jurisdiction’s refinancing guidelines below. The guidelines describe the conditions under which the jurisdiction will refinance existing rental housing project debt. The jurisdiction’s refinancing guidelines must, at minimum, demonstrate that rehabilitation is the primary eligible activity and ensure that this requirement is met by establishing a minimum level of rehabilitation per unit or a required ratio between rehabilitation and refinancing. If the jurisdiction will not refinance existing debt, enter “N/A.”

Discussion:

The City will focus all of its CDBG allocation on public infrastructure, public services and administration.