

## CR-05 - Goals and Outcomes

### **Progress the jurisdiction has made in carrying out its strategic plan and its action plan. 91.520(a)**

*This could be an overview that includes major initiatives and highlights that were proposed and executed throughout the program year.*

During PY 2018, the City nearly completed the Park Avenue reconstruction, which included adding drainage, sidewalks, and parking. The project cost was \$1,105,000, with CDBG covering \$591,616.76 from carried over PY 2016-PY 2017 funds and PY 2018 current year funds. The Park Avenue project is approximately 91% complete with \$566,398.89 expended to date. Park Avenue crosses through the Main Street Revitalization Area and the two lowest-income CDBG block groups based on the HUD data released in 2017.

In addition to this major infrastructure project, League City funded three public service projects through two non-profit organizations. Communities in Schools – Bay Area was provided \$16,000 in CDBG funds to assist in the salaries of a counselor in each of three schools: Bayside Intermediate, Clear Creek Intermediate, and Clear Creek High School. These three counselors provided a total of 1,485 hours of counseling to 93 unduplicated CDBG-eligible youth, including 11 homeless youth. These students represented 206.67% of the goal for the year.

Interfaith Caring Ministries (ICM) received funding for two projects: their food pantry and emergency rent/utility assistance to low- to moderate-income households at risk of eviction or service termination which could have led to homelessness. ICM had several difficulties early in the program year with the Director of Client Services being on medical leave and then retiring compounded by a gap in finding a suitable replacement. They expended all of their allocation of \$10,200 for the food pantry and served 629 persons in 226 households, with 64% being extremely low-income and several being homeless. The beneficiary count was 60.25% of expected, in part due to the delay in processing served clientele through the CDBG program and the decrease in the percent of clientele who were League City residents or otherwise CDBG-eligible. ICM provided 1-time rent and/or utility assistance to League City residents who had received a past due notice from their landlord and/or utility companies. ICM expended \$13,556.80 of their \$20,075 allocation and served 85 persons in 28 households with partial rent and/or utility assistance to prevent eviction or utility service interruptions. Nearly all (93%) of the beneficiaries were extremely low- or very low-income. Those served represented 65.38% of the expected total beneficiaries. The personnel issue was compounded by fewer than anticipated applicants living inside the city limits and rents escalating resulting in renters not being able to afford the difference between rent owed and the amount of assistance ICM could provide through the CDBG contract.

League City's administrative costs charged to the CDBG grant were well under the 20% allowable. The City expended \$29,257.50 (7.8%) of the

\$375,169 PY 2018 CDBG allocation, to manage the PY 2018 CDBG program.

**Comparison of the proposed versus actual outcomes for each outcome measure submitted with the consolidated plan and explain, if applicable, why progress was not made toward meeting goals and objectives. 91.520(g)**

*Categories, priority levels, funding sources and amounts, outcomes/objectives, goal outcome indicators, units of measure, targets, actual outcomes/outputs, and percentage completed for each of the grantee’s program year goals.*

Goal	Category	Source / Amount	Indicator	Unit of Measure	Expected – Strategic Plan	Actual – Strategic Plan	Percent Complete	Expected – Program Year	Actual – Program Year	Percent Complete
Code Enforcement	Non-Housing Community Development		Housing Code Enforcement/Foreclosed Property Care	Household Housing Unit	10	0	0.00%			
Domestic Violence Services	Homeless Non-Housing Community Development		Public service activities other than Low/Moderate Income Housing Benefit	Persons Assisted	25	0	0.00%			
Domestic Violence Services	Homeless Non-Housing Community Development		Homeless Person Overnight Shelter	Persons Assisted	10	0	0.00%			
Fair Housing Activities	Fair Housing Activities		Other	Other	10	0	0.00%			
Food Pantry	Non-Housing Community Development	CDBG: \$10,200	Public service activities other than Low/Moderate Income Housing Benefit	Persons Assisted	750	114	15.20%	1200	629	52.42%

Health Services	Non-Housing Community Development	CDBG: \$	Public service activities other than Low/Moderate Income Housing Benefit	Persons Assisted	25	0	0.00%			
Owner Occupied Housing Rehabilitation	Affordable Housing		Homeowner Housing Rehabilitated	Household Housing Unit	2	0	0.00%			
Park Improvements	Non-Housing Community Development		Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit	Persons Assisted	2425	0	0.00%			
Section 108 Payments	Section 108 repayment		Other	Other	5	0	0.00%			
Senior Services	Non-Housing Community Development		Public service activities other than Low/Moderate Income Housing Benefit	Persons Assisted	15	0	0.00%			
Sidewalk Improvements	Non-Housing Community Development		Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit	Persons Assisted	2425	0	0.00%			
Storm Water Drainage	Non-Housing Community Development		Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit	Persons Assisted	2425	0	0.00%			

Street Improvements	Non-Housing Community Development	CDBG: \$ \$566,398.89	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit	Persons Assisted	2425	0	0.00%	2549	2310	90.62%
Street Lighting Improvements	Non-Housing Community Development		Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit	Persons Assisted	2425	0	0.00%			
Subsistence Payments	Affordable Housing Non-Housing Community Development	CDBG: \$ \$13,556.80	Public service activities other than Low/Moderate Income Housing Benefit	Persons Assisted	0	7		130	85	65.38%
Subsistence Payments	Affordable Housing Non-Housing Community Development	CDBG: \$	Homelessness Prevention	Persons Assisted	200	7	3.50%	0	7	
Transportation Services	Non-Housing Community Development		Public service activities other than Low/Moderate Income Housing Benefit	Persons Assisted	15	0	0.00%			
Youth Service	Non-Housing Community Development	CDBG: \$ \$16,000	Public service activities other than Low/Moderate Income Housing Benefit	Persons Assisted	200	93	46.50%	45	93	206.67%

**Table 1 - Accomplishments – Program Year & Strategic Plan to Date**

**Assess how the jurisdiction's use of funds, particularly CDBG, addresses the priorities and specific objectives identified in the plan, giving special attention to the highest priority activities identified.**

The City's highest priority needs, as outlined in the current Consolidated Plan are (1) revitalizing neighborhoods through infrastructure and facility improvements, particularly in the Main Street/Park Avenue area; (2) improving the outcomes for at risk youth; (3) and providing emergency assistance to those who are low-income by providing assistance with food, rent, and utilities. Other priorities include assisting victims of domestic violence, particularly those who find themselves homeless, and assisting with health care for the uninsured indigent. However, in PY 2018, we received no funding applications from agencies providing either service. The City's expenditures, both CDBG and other expenditures in the CDBG Target Areas, addressed the infrastructure and facility priorities set forth in the Consolidated Plan.

In PY 2018, approximately 95% of Park Avenue's reconstruction was completed which created better drainage, additional street parking, and improved vehicular and pedestrian mobility through the City's primary target areas and to the Main Street corridor. This project enhanced linkages between those living south of Main to businesses and a City park located north of Main; and those living north of Main to social service agencies, businesses, and the area elementary school located south of Main. The project also greatly improves the mobility of first responders through the area.

Communities in School – Bay Area provided counseling to at risk youth in two intermediate schools and one high school that are the primary schools of the city's low- to moderate-income students. In PY 2018, in part due to their CDBG funding, Communities in Schools – Bay Area saw an academic improvement in 86.21% of its youth, a behavioral improvement in 82.67%, an improvement in attendance in 80%. Of the youth served, 100% received access to needed social services, 100% stayed in school, and 86.3% were promoted.

Interfaith Caring Ministries assisted League City residents, including homeless individuals and families, with needed food. Home-bound residents received their groceries delivered to ensure that they received the needed nutrition. The agency also helped prevent homelessness, at least temporarily until rapid rehousing or other benefits could be accessed, through assisting with one-time emergency rent and/or utilities for those in danger of eviction or service termination. Many of the clients required the assistance due to a job loss, illness, or other events that left them temporarily without funds for living expenses.

## CR-10 - Racial and Ethnic composition of families assisted

Describe the families assisted (including the racial and ethnic status of families assisted).

91.520(a)

	CDBG
White	600
Black or African American	176
Asian	6
American Indian or American Native	2
Native Hawaiian or Other Pacific Islander	4
Other/Multi-race	19
<b>Total</b>	<b>807</b>
Hispanic	249
Not Hispanic	558

**Table 2 – Table of assistance to racial and ethnic populations by source of funds**

### Narrative

The three public service activities served 807 individuals. Communities in Schools – Bay Area served 93 unduplicated youth, more than twice the anticipated number. The Interfaith Caring Ministries Food Pantry served 629 individuals in 226 households. The Interfaith Caring Ministries Emergency Rent/Utility Assistance program served 84 individuals in 28 households. The table below details the racial/ethnic status of the individuals by CDBG activity.

RACE/ETHNICITY	CIS-BAY AREA	ICM-FOOD	ICM-RENT/UTILITIES	TOTAL
White	71	472	57	600
Black or African American	17	134	25	176
Asian	3	3	0	6
American Indian or American Native	2	0	0	2
Native Hawaiian or Pacific Islander	0	4	0	4
Other	0	16	3	19
Total	93	629	85	807
Hispanic	39	199	11	249
Not Hispanic	54	430	74	558

**Table 2b –Table of assistance by Public Service Activity**

## CR-15 - Resources and Investments 91.520(a)

### Identify the resources made available

Source of Funds	Source	Resources Made Available	Amount Expended During Program Year
CDBG	public - federal	\$660,631.06	\$635,413.19
Section 108	public - local	0	

Table 3 - Resources Made Available

### Narrative

### Identify the geographic distribution and location of investments

Target Area	Planned Percentage of Allocation	Actual Percentage of Allocation	Narrative Description
Main St/Park Ave Target Area (no longer NRSA)	90%	86%	Includes carry-over funds from prior years

Table 4 – Identify the geographic distribution and location of investments

### Narrative

The NRSA designation for the Main St/Park Ave Target Area has been removed, however the information pre-populated by HUD for the CAPER still has it listed as an NRSA. In the paper copy of the CAPER, it has been changed to the Main St/Park Ave Target Area.

The Park Avenue reconstruction, including adding sidewalks and improving the drainage, was the only area-based activity undertaken in PY 2018. The activity, thus far, has constituted 86% of the total expenditures, including the PY 2018 allocation and prior year funds. The project is 91% complete and should be completed in January 2020, with the remaining funds expended.

## Leveraging

**Explain how federal funds leveraged additional resources (private, state and local funds), including a description of how matching requirements were satisfied, as well as how any publicly owned land or property located within the jurisdiction that were used to address the needs identified in the plan.**

While there is no match or leverage required for CDBG funds, the Park Avenue project used CDBG funds to match City funds in direct costs to contractors in a ratio of approximately 1:1. The City of League City also provides leveraging and matching funds for its CDBG grant through the salaries of several employees, including the City's Planning Manager who oversees the CDBG program; Engineering and Public Works staff who oversee the street reconstruction projects; the Finance and Purchasing staff who maintain all of the financial records and process payrolls and accounts payable; the Legal staff who review all contracts and other legally-binding documents. An estimated \$35,000 in non-reimbursed salaries has been expended to match the CDBG allocation.

Communities in Schools is funded for 16% of the salaries of a counselor at each of three participating schools. Approximately 60% of each counselor's time each month is spent with all CDBG-funded youth. Given that their allocation was \$16,000, \$28,500 of salary match for each counselor is provided for the program. Approximately 80% of the food and household goods supplied by Interfaith Caring Ministries to CDBG beneficiaries is funded by other private and public sources. Interfaith Caring Ministries also provides partial rent and/or utility assistance to households in need. Their CDBG-funded support is limited to 25% of the Director of Client Services and none of the Client Services Assistant salaries. Additionally, ICM provides more than \$80,000 in matching funds for direct services (emergency rent/utility payments) for CDBG-eligible clients funded through other sources.



## CR-20 - Affordable Housing 91.520(b)

Evaluation of the jurisdiction's progress in providing affordable housing, including the number and types of families served, the number of extremely low-income, low-income, moderate-income, and middle-income persons served.

Due to the limited amount of CDBG funding and the lack of HOME and ESG funds, the City of League City is not able to provide affordable housing units to homeless, non-homeless, or special needs populations. The only way in which the City assists the non-homeless is to assist the precariously housed by providing one-time rent and/or utility assistance to prevent eviction or loss of water, gas, and electricity through emergency subsistence support.

	One-Year Goal	Actual
Number of Homeless households to be provided affordable housing units	0	0
Number of Non-Homeless households to be provided affordable housing units	0	0
Number of Special-Needs households to be provided affordable housing units	0	0
<b>Total</b>	<b>0</b>	<b>0</b>

Table 5 – Number of Households

	One-Year Goal	Actual
Number of households supported through Rental Assistance	0	0
Number of households supported through The Production of New Units	0	0
Number of households supported through Rehab of Existing Units	0	0
Number of households supported through Acquisition of Existing Units	0	0
<b>Total</b>	<b>0</b>	<b>0</b>

Table 6 – Number of Households Supported

**Discuss the difference between goals and outcomes and problems encountered in meeting these goals.**

Without adequate funding, the City had no goals for addressing the affordable housing issues in the form of rental assistance, new unit production, acquisition, or rehabilitation. The City provided funding to Interfaith Caring Ministries to help prevent homelessness by providing emergency rental and/or utility assistance once annually to those in danger of eviction or loss of utilities. The PY 2018 goal was to serve 130 individuals but Interfaith Caring Ministries was only able to serve 85 individuals, within 28 households, with CDBG funds due to the increase in allowable assistance per beneficiary and the requirement and the delay in using CDBG funds. Additionally, Interfaith Caring Ministries received CDBG funds to support its food pantry to provide food and staples to those in need, freeing up some money to be used for rent and utilities, thus reducing the risk of homelessness or living in unsafe conditions.

**Discuss how these outcomes will impact future annual action plans.**

Without a local or state program to provide affordable housing options to the low-income, the City has been unable to address the issue in any meaningful way. Future work will include seeking housing partners, particularly partners to rehabilitate aging residences through alternative funding mechanisms. In PY 2017, Southeast Texas Housing Development Corporation used other funds to rehabilitate 2 homes in League City. It is anticipated that the agency will repeat the program in the future, however no funds were allocated for rehabilitation in League City for PY 2018, nor have any been allocated for PY 2019.

**Include the number of extremely low-income, low-income, and moderate-income persons served by each activity where information on income by family size is required to determine the eligibility of the activity.**

<b>Number of Households Served</b>	<b>CDBG Actual</b>	<b>HOME Actual</b>
Extremely Low-income	0	0
Low-income	0	0
Moderate-income	0	0
<b>Total</b>	<b>0</b>	<b>0</b>

**Table 7 – Number of Households Served**

**Narrative Information**

While the City of League City recognizes the need for additional affordable housing units and rehabilitation of deteriorating housing owned and occupied by low-income residents, there is no

funding mechanism available to support such activities. The City does not receive HOME or ESG funds and there is no Public Housing Agency that serves League City residents through either housing developments or Section 8 Housing Choice Vouchers. In the recent years, no developers have submitted viable LIHTC applications to the State for developments within the city limits of League City.

The only way in which the City assists the non-homeless is to assist the precariously housed by providing one-time rent and/or utility assistance to prevent eviction or loss of water, gas, and electricity. During PY 2018, Interfaith Caring Ministries utilized the City's CDBG funds to provide emergency rental and/or utility assistance to 85 individuals in 28 housing units as a means to prevent or postpone homelessness. Of these, 50% were extremely low-income and, as a result, considered precariously housed. Another 43% were very low-income and 7% were low (moderate) income. Additionally, Interfaith Caring Ministries received CDBG funds to support its food pantry to provide food and staples to those in need, freeing up some money to be used for rent and utilities, thus reducing the risk of homelessness or living in unsafe conditions. Interfaith Caring Ministries used CDBG funds to help support 629 individuals in 226 households with food and staple items. Of these, 64% were extremely low-income and could be considered precariously housed.

## **CR-25 - Homeless and Other Special Needs 91.220(d, e); 91.320(d, e); 91.520(c)**

**Evaluate the jurisdiction's progress in meeting its specific objectives for reducing and ending homelessness through:**

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

League City did not allocate CDBG funds in PY 2018 for homeless assistance. However, the funds allocated to Interfaith Caring Ministries for their food pantry did serve an estimated 100 individuals who were unsheltered homeless or living with other families. Communities in Schools served 11 homeless youth in PY 2018 and provided assistance to the families of those youth who were not unaccompanied.

### **Addressing the emergency shelter and transitional housing needs of homeless persons**

There are no emergency shelters or transitional housing programs in League City. Any of the City's subrecipient clients who are in need of shelter or transitional housing are referred to programs in Harris County. In the past, Bay Area Turning Point has received funding from CDBG for its domestic violence shelter, however, in PY 2018 no funds were requested. The City's Police Department works closely with Bay Area Turning Point to refer or escort victims of domestic violence or sexual assault to the shelter.

### **Helping low-income individuals and families avoid becoming homeless, especially extremely low-income individuals and families and those who are: likely to become homeless after 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); and, receiving assistance from public or private agencies that address housing, health, social services, employment, education, or youth needs**

The City funds Interfaith Caring Ministries for its food pantry and emergency rent and utility assistance. The agency supported approximately 529 housed low-income individuals with food and 85 with emergency rent and/or utility assistance. Both activities helped the individuals from becoming homeless. Additionally, the family support provided the youth served by Communities in Schools – Bay Area helps the low-income families who are precariously housed from becoming homeless.

### **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**

There are no facilities or services in League City for homeless persons making a transition to permanent housing. Harris County Community Development does provide some assistance within the county, but, because League City receives CDBG funds, the small area of the city within Harris County is not eligible for Harris County CDBG, HOME, or ESG funding.

### **CR-30 - Public Housing 91.220(h); 91.320(j)**

#### **Actions taken to address the needs of public housing**

There is no public housing in League City. Harris County does provide Section 8 Housing Choice Vouchers to County residents, but the small area in the far southeast corner of the County that is in League City does not have sufficient available rental housing for Housing Choice Voucher holders.

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

Not Applicable – there are no public housing residents in or near League City

#### **Actions taken to provide assistance to troubled PHAs**

Not Applicable – there is no PHA in League City

### **CR-35 - Other Actions 91.220(j)-(k); 91.320(i)-(j)**

**Actions taken 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. 91.220 (j); 91.320 (i)**

The Main Street Revitalization Program, which includes the reconstruction of a major corridor through two adjacent lower-income neighborhoods, has ameliorated the negative effects of prior public policies to focusing much of City revenues on growth and development in newer areas of the city between Highway 3 and US 45 and west of US 45. The prior years' reconstruction of interior roads and the major reconstruction, including improved drainage, parking, and sidewalks, have improved the return on residential investment by stabilizing housing values without encouraging buy-outs for demolition/reconstruction. The area is a stable predominately owner-occupied single family.

The continued City and CDBG investment in the Main Street/Park Avenue area is enhancing accessibility and vitality of the City's primary lower-income neighborhoods. This is being done without encouraging buyouts by developers to demolish the older homes and reconstruct large new housing out of the reach of the low- to moderate-income.

### **Actions taken to address obstacles to meeting underserved needs. 91.220(k); 91.320(j)**

The suburban nature of League City is the primary barrier to the vast majority of agencies serving the lower-income and special needs populations from locating in the city limits. However, League City allocated the maximum 15% of the CDBG funds to three activities supported by the only two agencies applying for funding in PY 2018. These activities address the primary social service needs of the community: (1) improving academic and economic outcomes for youth; (2) providing food and household goods to those who cannot afford to feed themselves or their families without assistance or foregoing other needs; and, (3) providing emergency rent and utility assistance to those who are in danger of homelessness due to a temporary financial crisis.

During the program year, the City met with other social service, housing, and homeless agencies to encourage participation in the CDBG program. None of the approached agencies were interested in accessing CDBG funding.

### **Actions taken to reduce lead-based paint hazards. 91.220(k); 91.320(j)**

No actions were taken to reduce lead-based paint hazards as the City did not expend any funds on housing activities. In the years in which Southeast Texas Housing Development Corp or other non-profits rehabilitate homes in League City, the City ensures that all lead-based paint regulations are followed.

**Actions taken to reduce the number of poverty-level families. 91.220(k); 91.320(j)**

Though League City has 5.1% of its households below poverty versus the MSA at 12.3%, the City is concerned with those who are living below poverty. The City's Economic Development Council works to encourage small businesses and to bring in large corporations that can employ unskilled and skilled labor. The health care industry in League City is growing dramatically with regional hospitals and medical care. These are employing individuals who were unemployed or underemployed. All City construction projects seek Section 3 businesses and the City assists individuals to become registered as a Section 3 business or individual. For the only construction contract awarded in PY 2017 and carried out in PY 2018 through CDBG or other funding, no Section 3 companies responded, nor did the work require the hiring of new employees for the positions. However, the City strives to seek Section 3 companies and to encourage hiring Section 3 employees. Additionally, all of the PY 2018 construction work contracted by the City paid considerably higher hourly wages than the Davis Bacon Wage Rates require.

No direct actions were taken to reduce the number of poverty-level families. CIS counsels the at risk students to prevent dropping out and encourages and assists them in receiving higher education that will provide income above the poverty level.

**Actions taken to develop institutional structure. 91.220(k); 91.320(j)**

City staff attended a number of CDBG trainings and conferences and on-line trainings/webinars during the year. Other City departments continue to participate in the planning and coordination of planned public infrastructure projects using CDBG funds. The City works closely with its subrecipients to ensure that their activities meet all federal requirements and that they coordinate with one another when appropriate. City staffmembers and elected officials work closely with H-GAC, the regional Council of Governments, and neighboring entities, particularly in the area of transportation, hazard mitigation, and disaster recovery.

**Actions taken to enhance coordination between public and private housing and social service agencies. 91.220(k); 91.320(j)**

There are few social service agencies in League City and no public or private housing agencies. The City works closely with the public service agencies in the area. Three agencies, two receiving CDBG funding and one not applying, are located in the Main St/Park Ave Target Area and are involved in the activities to improve the neighborhood. The City has a close relationship with Southeast Texas Housing Development Corporation which has provided funds and labor to rehabilitate housing periodically in the city. In the past the City has coordinated with UMArmy for volunteers to rehabilitate homes, however the agency is regional and has not had the capacity



to work in League City recently. The City is working to encourage more work by UMArmy in the city.

Coordination between the City and its social service subrecipients has been strong. Additionally, the City, especially the Police Department, has a very close working relationship with Bay Area Turning Point, a domestic violence shelter. In the past Bay Area Turning Point has applied for and received CDBG funding from League City. Recently, other funding sources have filled the gap for them, but they continue to work with the City in addressing the needs of the victims of domestic violence and sexual assault.

The City and its subrecipients coordinate with Gulf Coast Center regarding information on Gulf Coast Center's Connect Transit, which provides demand response transportation services to all residents. Additionally, coordinating with and through Gulf Coast Center, is the RIDES program that serves the elderly and disabled population residing in League City. The RIDES program is a subsidized program served by Greater Houston Transportation that coordinates non-emergency transportation at a significant discount for qualified riders.

**Identify actions taken to overcome the effects of any impediments identified in the jurisdictions analysis of impediments to fair housing choice. 91.520(a)**

The City took the following actions to overcome the effects of any impediments identified in the PY 2017 Fair Housing Plan:

1. Enhance living conditions through public improvements – completed approximately 95% of the major reconstruction/enhancement of Park Avenue, a mixed land use street providing access to and through the residential neighborhood. This has improved access to businesses for employment opportunities, Interfaith Caring Ministries for food and rent/utility assistance, and to Gulf Coast Center, providing services for the intellectually and developmentally disabled as well as demand response transportation services for the general population and reduced cost transportation for the elderly and disabled. While these do not directly overcome impediments to fair housing choice and affordable housing, they do help to improve the access to amenities in the two neighborhoods in League City with the highest percent of low-income and protected class population.
2. Enhance financial independence and job opportunities – funded Communities in Schools to provide drop-out prevention and reduce at-risk behaviors to prepare the students for higher education and enhanced income, including 59 minority, 11 homeless, and 61 living in female-headed households, all of whom were low- to moderate-income. Additionally, the City supported Interfaith Caring Ministries in providing emergency rent/utility assistance and food assistance to 254 households, of which 127 were headed by a minority householder, 35 were disabled householders, 153 were female householders,

and 35 were elderly householders. By, reducing their expenses, even temporarily, they were able to weather the financial storm and prevent immediate eviction or other financial crises that would have forced them into homelessness or relocation into less desirable dwellings.

3. Conduct code enforcement activities in minority and low-income neighborhoods – using General Funds, the City continued to provide code enforcement throughout the entire city, including the areas of high concentrations of protected class and/or low- to moderate-income households as a means of maintaining quality neighborhoods of choice.
4. Fair Housing Officer – The City continued to maintain a Fair Housing Officer to address questions and concerns as well as investigate fair housing complaints and maintain records of fair housing issues. No questions, concerns, or complaints arose.
5. Educate public – During PY 2018, the City conducted two public hearings for the CDBG program and presented fair housing information at both.
6. Monitoring payrolls of CDBG-funded construction – The City monitored the certified payrolls of every employee of the prime and subcontract contractors for the Park Avenue project. Approximately 95% of the employees were minority. All wages were well above the Davis Bacon Prevailing Wage Rates. This helps to ensure that those workers receive fair wages that can translate into fair housing choice.

## **CR-40 - Monitoring 91.220 and 91.230**

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

League City's CDBG monitoring process is an on-going one of planning, implementation, communication and follow-up and is outlined in detail in the CDBG Policies and Procedures Manual. A major component of the monitoring process is the review of all documents submitted with each reimbursement request. These documents include all financial supporting documentation as well as client information and agency staffing information. Each document is carefully reviewed and any concerns or questions are directed to the submitting agency. No funds are reimbursed until all documentation is in order.

Under normal circumstances, on-site monitoring of public service is conducted annually to semi-annually. However, if the activity or program is considered to have a high-risk of non-compliance, a more frequent monitoring schedule is developed based on the nature of the activity being performed. High-risk programs may include programs undertaken by any one subrecipient or City department for the first time, housing rehabilitation, agencies conducting multiple activities, and programs undertaken by an agency or department with a history of staff turnover, reporting problems, or monitoring findings. The City uses the HUD monitoring checklists as a starting point and expands on those to include local requirements.

For construction contracts, the City monitors the weekly certified payrolls for each contractor and its subcontractors, conducts employee interviews of at least one employee per job description, and monitors the job site for proper EEOC postings and federal-funding signage as well as work quality. The Public Works Department monitors the projects on a regular basis for contract compliance, work quality, progress, and safety. The City encourages the hiring of Section 3 employees and when a contractor indicates that such an employee has been hired, the City interviews him/her to ensure that the employer's information is correct.

## **Citizen Participation Plan 91.105(d); 91.115(d)**

**Describe the efforts to provide citizens with reasonable notice and an opportunity to comment on performance reports.**

PY 2017 was the first year of League City's new Consolidated Plan. During PY 2016 in preparation of the Consolidated Plan, the City reviewed and updated the Citizen Participation Plan to help improve involvement of the community in all CDBG actions. In PY 2018, the City ensured that residents and stakeholders had ample opportunity to participate in the planning process. The City provided two public hearings specifically for the Annual Action Plan, and one public comment period during the City Council meeting where the Annual Action Plan was submitted for approval. In addition, the City provided a 30-day public comment period for the AAP. Additionally, all

notices were posted at City Hall and the Public Library, both within one half-mile of the Main St./Park Ave. Target Area, which was the location of the public infrastructure project and the offices of both public service agencies, as well as both public hearings. The public hearings and public comment period were advertised in English and Spanish and copies of the AAP were available for review. All three locations are less than a half-mile from the Main St./Park Ave. Target Area and is easily accessible to all residents, particularly those in the CDBG-eligible areas. During all annual public hearings for the CDBG program, priority needs, recommended funding with CDBG, and fair housing are topics for educational purposes and to elicit input from the attendees. The City also discussed the CDBG program and plans, soliciting input, when monitoring public service agencies or discussing applications with public service agencies requesting CDBG funds.

The Main St./Park Ave. planning process began approximately 6 years ago for all the activities regardless of the funding source. Public participation was sought for all of the planning and informational meetings and the input has been instrumental in determining the City's plans for its CDBG funding.

Public comment periods for CDBG activities are 30 days for the Annual Action Plans and any amendments, 18 days for joint FONSI/NOIs when RROFs are required, and 15 days for CAPERs. All notices are published in the general circulation paper, on the City's website and at City Hall and the Public Library. Notices for public hearings are published in English and Spanish at least 72 hours in advance of the hearing. City Council meetings give interested parties an additional opportunity to comment of the CDBG program at any time and on pending council action on the day of the meeting. The City Council agendas are also publicly posted at least 72 hours prior to each meeting.

Due to the location of League City adjacent to the fourth largest city in the nation, the entire jurisdiction has cable, internet, and 4G cell coverage. Comcast/Xfinity, Dish, Direct TV, and Frontier cover the entire League City area and all have service plans that include internet access. Cell phone coverage is throughout the city regardless of the provider. Most of the services are available for less than \$10/month for those with limited income. Additionally, the City has a municipal access channel that provides governmental and educational information and streams council meetings and other municipal meetings. All the council meetings are archived. At this time, the CDBG public hearings are not recorded but may be in the future. Additionally, the City is not posting CDBG information on Facebook or other social media but is investigating the possibility and production value of doing so.

The City reviews its Citizen Participation Plan annually to assess the need for any changes.

For this CAPER, the City posted a notice on **December 11, 2019** opening the public comment

period through December 28, 2019. The notice was posted in the general circulation newspaper, and at City Hall, City Hall Annex, and Library.

**CR-45 - CDBG 91.520(c)**

**Specify the nature of, and reasons for, any changes in the jurisdiction’s program objectives and indications of how the jurisdiction would change its programs as a result of its experiences.**

The City’s program objectives have not changed, however, the PY 2016-PY 2017 plan to secure a Section 108 loan was tabled in PY 2018. Sufficient general funds were available to carry out the portion of the activities for which Section 108 funds were planned. The previous delay in beginning the Park Avenue reconstruction while awaiting Section 108 funding became moot and the project was carried out in PY 2018, and is at 95% completion, with funding at 90.62% drawn.

Each year the City opens its process up to all eligible public service agencies. Each year the City receives at least three applications – one from Communities in Schools – Bay Area; and two from Interfaith Caring Ministries for the food pantry and rent/utility assistance to needy households. In earlier years Bay Area Turning Point domestic violence service center and shelter periodically submitted an application and was funded. In past years, Bay Area Turning Point submitted applications and was funded and in PY 2017, Anchor Point submitted an application and was funded. Unfortunately, neither agency submitting an application in PY 2018. No other agency in League City submitted applications. The City strives to seek other public service or affordable housing agencies to fund, but due to the suburban nature of the community there are few agencies in the area.

**Does this Jurisdiction have any open Brownfields Economic Development Initiative (BEDI) grants?**

No.

**[BEDI grantees] Describe accomplishments and program outcomes during the last year.**

Not Applicable

**CR-45 - CDBG 91.520(c)**

**Specify the nature of, and reasons for, any changes in the jurisdiction's program objectives and indications of how the jurisdiction would change its programs as a result of its experiences.**

**Does this Jurisdiction have any open Brownfields Economic Development Initiative (BEDI) grants?**

**[BEDI grantees] Describe accomplishments and program outcomes during the last year.**