



COMMUNITY DEVELOPMENT BLOCK GRANT
ANNUAL ACTION PLAN PROGRAM YEAR 2019



928-5TH AVENUE NORTH
TEXAS CITY, TX 77590
(409) 643-5731

Restructuring program to allow existing staff capacity to maintain and increase level of services. Where program is not so staff intensified. Deleting 2 (two) activities minor housing rehabilitation and code enforcement. Amended on May 5, 2021 to add CDBG CARES Act funds to the PY2019 Annual Action Plan.

Executive Summary

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

1. Introduction

The City of Texas City Office of Community Development is dedicated to promoting Texas City's residents, neighborhoods, individuals, businesses and environment by identifying revitalization opportunities, fostering community partnerships, providing support to social services, when and where possible creating economic opportunities, cultivating neighborhood leadership, and engaging in active housing assistance programs to create equitable living environments that enhance and sustain the quality of life for all residents. Program Year 2019 is the Fifth Year Annual Action Plan of the Five Year Consolidated Plan of Texas City for the use of Community Development Block Grant (CDBG) funds. The Community Development Block Grant is the only program the city administers. It is anticipated that the city will receive \$471,499.00 in entitlement funds to complete the Five-Year Consolidated Plan.

The City expects to spend at least \$1,500 dollars on fair housing activities on education, outreach and enforcement. During the PY 2018 the City conducted and participated in several fair housing activities. Staff conducted outreach and educational services by placing notices of the Fair Housing Fact Sheet: in various areas of the city such as the local Housing Authority, the city's Library and post on city channel. The fair housing information was in Spanish and English. City staff also, outreached by placing fair housing posters in varies city building, schools and public buildings.

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.

This Plan identifies programs and activities that will be used to meet Texas City's Community Development's goals. As required by HUD, each activity is linked to one of three federal program objectives: 1) decent housing, 2) suitable living environment, or 3) economic development. Each objective is matched with one of three outcomes: 1) availability/accessibility, 2) affordability, or 3)

sustainability. Some services have dual objectives and outcomes where the overall need is met in several ways. The annual activities that will enable Texas City to continue to achieve these objectives and outcomes in PY 2019 are:

Decent Housing: Facilitate making decent housing more available, accessible, affordable, and sustainable for low- and moderate-income residents through: Homeownership the American Dream. The City will promote its First Time Homebuyers Program (Funding from prior year), as an incentive to encourage low-to moderate income persons to pursue homeownership. Funds will be used to provide up to \$7,500 per household, for the purchase of a home.

Homeownership Counseling: Education to enable new homebuyers to understand the 1. the process before the purchase, 2. the responsibilities after the purchase and how to budget, maintain and care for their new home.

- Reconstruction of homes in the five-year targeted area of Chelsea Manor a low income area where government housing was built to encourage people to come, live and rebuild the city after the 1947 disaster, where massive casualties, and extreme property damage occurred.
- Homelessness prevention through referral services

Suitable Living Environment: Make suitable living environments more available, accessible, affordable, and sustainable for low- and moderate-income residents through

- Improving the targeted neighborhood through cleanup efforts such as, removing illegally dumped rubbish, removing high grass and weeds in common areas, modernization and revitalization of housing, replacing street signs, and damaged street poles.
- Support and Referral services for populations with special needs (e.g. elderly, persons with disabilities services for the homeless
- Environmental Health services

Economic Development/Opportunities: Increase access to economic opportunity for low- and moderate-income communities through

- Neighborhood clean-up activities that removes eyesores in low and moderate neighborhoods that may prevent opportunities for job creation, investments and, the Clearance and Demolition of vacant dilapidated structures to prevent slum and blight on a spot basis which will increase safety in each neighborhood. At least 20 of these structures will be identified for demolition.

3. Evaluation of past performance

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

From October 1, 2010 - September 30, 2015, The City made significant investments in advancing affordable housing activities in the community from housing rehabilitation to homeownership opportunities through the use of Community Development Block Grant (CDBG) funds. In identifying the past performance of projects and goals the city identified the priority projects rendered a success rate of 50% or more of the goal accomplishment. There was a shift in program delivery during the time period of PY 2013-2014 due to a greater shift in the community's needs and a shortage of staff to conduct the required tasks to complete the activities. As noted this Action Plan is a substantial amendment to the programs structure where a faster expenditure rate can occur, more eligible residents can receive services in a faster period of time, and a much noticeable improvement in the communities where grant funds are expended.

4. Summary of Citizen Participation Process and consultation process

Summary from citizen participation section of plan.

The City of Texas city began its citizen participation and consultation process on June 12, 2019 with a public presentation to the Community Development Committee, two Agencies and 4 citizens who were present. Texas City Community Development Department recognizes that the residents are the center of, and partners in, the development and execution of these plans. The discussion included several components: The purpose of the meeting, the eligibility criteria of projects, eligible CDBG activities, ineligible activities, a review of priorities and activities identified in the 5-Year Consolidated Plan of 2015-2019. The City mailed out 22 invitational/informational letters to local faith based organizations in low and moderate income areas and social supportive housing organizations. The public hearing meetings were held at the City Hall Annex building where the Community Development Department is located. The second public presentation was conducted July 9th, 2019, both public notices were published in the Galveston County Daily News, posted in and outside of City Hall, on the city's community channel, at the library and at the Texas City Housing Authority.

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.

There were no written public comments. Several attendees stated Community Development was doing a great job.

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

There were no comments or views not accepted.

7. Summary

This Annual Action Plan generally follows the blue print of the previously submitted Consolidated Plan. Two major changes have occurred the elimination on housing rehabilitation and code enforcement. Texas City's Consolidated Plan is a five year document. It began in 2015 and ends in 2019. The Consolidated Plan identified objectives and priorities for this time period, which could be funded by CDBG. This Annual Action Plan intends to make major progress in carrying out the overall objectives and priorities that are outlined in the 2015-2019 amended Consolidated Plan.

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
Lead Agency	TEXAS CITY	
CDBG Administrator	TEXAS CITY	Community Development
HOPWA Administrator		
HOME Administrator		
HOPWA-C Administrator		

Table 1 – Responsible Agencies

Narrative (optional)

The City of Texas City's Community Development Department is the lead agency for coordinating and implementing the Five-Year Consolidated Plan and the One-Year Action Plans. The Department is responsible for the administrative oversight of the CDBG Program activities for the compliance with HUD's regulatory and statutory requirements including Citizen participation, environmental reviews, all CDBG expenditures, EEO Compliance, Annual Action Plan, Consolidated Annual Performance and Evaluation Report (CAPER). The Community Development Department serves as the City's Fair Housing Office and responsible for ensuring Texas City's commitment to affirmatively furthering fair housing choice for all residents.

Consolidated Plan Public Contact Information

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

1. Introduction

The City of Texas City recognizes partnerships with public and private entities are vital to the provision of effective services to the Texas City community. Each strategy prioritized by the City is only accomplished through effective collaborations with community partners. These partners provide the expertise needed to ensure quality service provision, housing development, and neighborhood revitalization efforts.

In preparation for this Annual Action Plan, Texas City's community development department performed extensive outreach to both citizens and stakeholders. These stakeholders included people who work with low- and moderate-income persons, persons with special needs, persons of protected classes, or work in low- and moderate-income areas.

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))

Staff mailed out notices, posted notices at public and private housing agencies and local businesses, announced the upcoming public hearings regarding proposed activities and budget in churches and other public settings, published notices in the Galveston Daily news, The Post newspaper, on the municipal channel, on the City's web-page, made telephone calls and scheduled one on one face to face meetings with public and assisted housing providers, private and governmental health, mental health and service agencies.

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.

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

Texas City does not receive an Emergency Shelter Grant (ESG) funds, nor has the city consulted with the Continuum of Care on how to allocate any ESG funds.

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

Table 2 – Agencies, groups, organizations who participated

1	Agency/Group/Organization	Texas City Housing Authority
	Agency/Group/Organization Type	PHA Services - Housing Services-Elderly Persons Services-Persons with Disabilities
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Public Housing Needs Homeless Needs - Families with children
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Meeting face to face with Executive Director. Discussions included adding more affordable housing units and possibly looking into a mixed income development in the downtown area.
2	Agency/Group/Organization	Lone Star Legal Aid
	Agency/Group/Organization Type	Housing Services-Children Services-Elderly Persons Services-Persons with Disabilities Service-Fair Housing Services - Victims
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Anti-poverty Strategy
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Community Development staff invited Lone Star Legal Aid services to the city to discuss fair housing within the County, the lack of employment opportunities and housing opportunities due to minor offenses.

3	Agency/Group/Organization	Galveston County Health District
	Agency/Group/Organization Type	Services-Persons with HIV/AIDS Services-Education Health Agency Other government - County Other government - Local
	What section of the Plan was addressed by Consultation?	Homeless Needs - Chronically homeless Homelessness Needs - Veterans HOPWA Strategy Anti-poverty Strategy Lead-based Paint Strategy
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Met with the County's Epidemiologist regarding the number of children under 7 years old with Elevated Blood Lead Levels (EBLL) and how to protect them, and met with the Galveston County Health Director on Environmental Health concerns rodents, snakes and other unhealthy vermin in the area.
4	Agency/Group/Organization	Texas City Independent School District
	Agency/Group/Organization Type	Services-Children Services-Health Services-Education
	What section of the Plan was addressed by Consultation?	Homeless Needs - Families with children Homelessness Needs - Unaccompanied youth Economic Development Anti-poverty Strategy
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Met with the School in discussions pertaining to the percentage of students receiving free and / or reduced lunch and the number of students taking advantage of the schools health services.

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

Other local/regional/state/federal planning efforts considered when preparing the Plan

Name of Plan	Lead Organization	How do the goals of your Strategic Plan overlap with the goals of each plan?
Continuum of Care		

Table 3 – Other local / regional / federal planning efforts

Narrative (optional)

AP-12 Participation – 91.105, 91.200(c)

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

The City of Texas City's Citizen Participation Plan requires that, before the City adopts an annual action plan, it will make available to citizens, public agencies, governmental departments and other interested parties information that includes the amount of assistance the City expects to receive and the range of activities that may be undertaken, including the estimated amount that will benefit persons of low-and moderate income. Citizen Participation is a major component of the planning process. In addition to meeting with representatives from nonprofit agencies and governmental departments, the City held two public meetings to solicit comments from citizens and all parties interested in housing or community development building, regarding uses of Community Development Block Grant (CDBG) program funds for 2019. The meetings were held June 12th, and July 9th, 2019 at the City Hall Annex building 928 – 5th Ave N. Notices of the public meetings were published in the Galveston county newspaper, the Post News Paper. Staff included ten (10) local faith based organizations that are located in low-moderate income areas. Community Development staff carried out a community needs assessment with various groups to determine if any changes in housing, non-housing or community development needs and priorities had occurred within the past year, and to obtain a community perspective of future challenges and areas of concerns. The assessment included the following city departments and local agencies. Community Development; Economic Development ; Police; Inspections; Planning; Finance; Public Works, and Parks & Recreation (Senior Services). The agencies and entities included: The Texas City Housing Authority; United Way of Galveston County; Texas Department of Human Resources; Child Protective Services; Adult Protective Services; Galveston County Health District; Gleaning of the Harvest Food Bank, and The Gulf Coast Center. A Spanish translator was provided at both participation meetings and transportation was provided if needed.

Citizen Participation Outreach

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (if applicable)
1	Newspaper Ad	<p>Minorities</p> <p>Non-English Speaking - Specify other language: Spanish</p> <p>Persons with disabilities</p> <p>Non-targeted/broad community</p> <p>Residents of Public and Assisted Housing</p>	<p>Several residents and community agencies called and stated why they could not attend. The meeting attendance was low, but several citizens, community development board members and an interested party in housing development attended.</p>	<p>There was one verbal comment that community development was doing a great job.</p>	<p>None</p>	

Table 4 – Citizen Participation Outreach

Expected Resources

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

Introduction

With the recent completion of the FY 2015-2019 Consolidated Plan and Action Plan amendment process in accordance with 24 CFR Part 570.427. For FY 2019, our Action Plan will include the following changes/amendments as part of a re-design of our CDBG Program:

Deleted Activities: Code Enforcement Housing (Emergency) Rehabilitation

Based on the definition stated in our Consolidated Plan for what constitutes a substantial change, along with the fact that both activities will not be included in our final Action Plan (Year 5), the City has followed the Citizen Participation steps to ensure our community has been informed of these changes and has been presented with the opportunity to provide comments and input.

Also, Texas City has modified the definition of “substantial change” in our Consolidated Plan. This modification will raise the funding threshold from \$20,000 to \$50,000, as the City has determined the higher amount to be more reflective of a substantive change to the City’s CDBG Program (24 CFR Part 570.431).

These changes were made in conjunction with the City’s Annual Action Plan notification process. Two public hearings were held to inform the public and to receive comments. Those hearings were held on the following dates and at locations below:

City Hall Annex Wednesday June 12th, 2019

City Hall Annex Tuesday July 9th, 2019

We will reflect these changes in the system once we receive acknowledgement from the Houston Field Office. Texas City continues to strive to serve our community better and believe these modifications to our CDBG Program will further our goals as outlined in our Plans.

Anticipated Resources

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
CDBG	public - federal	Acquisition Admin and Planning Economic Development Housing Public Improvements Public Services	417,499	0	0	417,499	0	
Other	public - federal	Other	544,704	0	0	544,704	0	CDBG-CV funds to be used to prevent, prepare for and respond to the Coronavirus.

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 are no MATCHing requirements for CDBG entitlement funds. The City has proposed to invest when needed local funds into housing reconstruction which will further the federal funds.

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

There is no known publically owned land or property located within the jurisdiction that may be used to address the needs identified in the plan.

Discussion

For the last year of the Five Year Consolidated Plan the city has shifted goals for the CDBG program, with notification and explanations through meetings with community residents. With the reduction in staff in order for the city to continue in the CDBG Program changes (for the better) are detailed in this 2019 Action Plan. Due to the fact of the minor rehabilitation repair program has not in the last three years been as successful as in the past. Construction material has risen, the \$5,000 limit is not showing any results or impact in the community. The city will discontinue the minor repair program and has opt to design the program with reconstruction or infill housing.

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	Preserve existing Housing Stock	2015	2020	Affordable Housing	Chelsea Manor	Affordable Housing	CDBG: \$250,000	Homeowner Housing Added: 2 Household Housing Unit
2	Neighborhood Clean Up	2015	2020	Non-Housing Community Development	Chelsea Manor	Neighborhood Clean-Up	CDBG: \$15,000	Public service activities for Low/Moderate Income Housing Benefit: 6 Households Assisted
3	Demolition / Clearance Spot Basis	2015	2020	Slum and Blight Prevention	City Wide	Demolition / Clearance	CDBG: \$71,649	Buildings Demolished: 20 Buildings
5	Administration 2015	2015	2019	Administration	Low and Moderate Income Areas Chelsea Manor City Wide	Affordable Housing Neighborhood Clean-Up Demolition / Clearance	CDBG: \$80,000	Other: 100 Other

Table 6 – Goals Summary

Goal Descriptions

1	Goal Name	Preserve existing Housing Stock
	Goal Description	In 2015 when the Consolidated Plan was created the city did not take into account the past housing stock of 2009. In 2009, Hurricane Ike hit the gulf coast and damaged most of the older existing housing. From Hurricane Ike to Harvey and many storms in between over 500 houses from the existing stock has been rebuilt. As of Today the City will use \$2.27 million dollars in federal disaster aid to buyout all the houses on a street that has a history of flooding including during Hurricane Harvey in 2017. The City will use Community Development Block Grant Disaster Recovery money for a buyout and acquisition program. Now as we look at preserving the existing housing stock the strategic plan goal has shifted to housing reconstruction. In its prior Consolidated Plans and Action Plans the city chose a minor emergency repair program with a limit of \$5,000 per code violation such as a new roof, electrical system up to code and plumbing which could require replacing piping under ground, with this activity option one could not see the CDBG money that went into a structure. Cost for repairs and replacements have sky rocketed and given the limited staff this activity no longer fit the needs in the community. The new preservation of the housing stock will be accomplished through reconstruction.
2	Goal Name	Neighborhood Clean Up
	Goal Description	The neighborhood clean up activity has been a way through the years of combating the rat infestation in the community. The removal of high grass and weeds or trash and illegally dumped matter if left is a haven for rodents, snakes and other animals to hide. The city has focused on the Chelsea Manor neighborhood to remove high grass and weeds, remove trash and illegally dumped matter. Funds will provide for the clean up of the area as well as the installation of new stops signs and street signs. The goal is to increase homeowner pride and a sense of community by supplying exterior repair and paint program in order to revitalize the neighborhood.
3	Goal Name	Demolition / Clearance Spot Basis
	Goal Description	The city will continue to demolish on a spot basis vacant dilapidated structures City Wide to prevent blight and slum conditions that contribute to neighborhood decline and decreased property values

5	Goal Name	Administration 2015
	Goal Description	The goal for the 2019 Administration is to provide for the overall planning and administration of the CDBG program. It includes preparation and submission for required reports Consolidated, Annual Action Plan and the end of the year report CAPER. It will be used for community outreach, information, and publications for affirmatory furthering fair housing, for monitoring program activities and tracking expenditures.

Projects

AP-35 Projects – 91.220(d)

Introduction

Guiding Principles: Under the five-year strategic plan, the following goals and principals were identified to help guide the City in setting priorities, developing strategies, and evaluating, selecting specific projects for CDBG funding: 1. Help those with greatest need - persons with very low, low income, senior citizens (fixed income) and persons with disabilities (limited income). 2. Promote homeownership- to stabilize neighborhoods and help low-income persons prosper. 3. Help beneficiaries succeed in the long run-by providing referrals to education, supportive services, job skills and employment opportunities to help them improve their economic standing and ability to afford and maintain their homes. 4. Take a holistic approach to community development-by coordinating affordable housing developments with transportation, jobs, schools, hospitals, grocery stores and other services. 5. Increase the stock of affordable housing - by supporting new construction and reconstruction. Since 1992, the City has received funding resources through the U.S. Department of Housing and Urban Development to administer the Community Development Block Grant (CDBG).

Neighborhoods in obvious decline and those that are in transition will be targeted for reconstruction. Those neighborhoods with traits that contribute to blight conditions, such as dilapidated housing, vacant lots, high crime, unkept properties, and low homeownership rates will be given priority for the reconstruction activity. Under this new initiative, staff has identified Chelsea Manor as the targeted neighborhood.

Projects

#	Project Name
1	Housing Reconstruction (19)
2	Neighborhood Revitalization Clean-Up (19)
3	Housing Counseling (19)
4	Demolition/Clearance SB (19)
5	Administration/Planning (19)
6	CV-Rental Assistance
7	CV-Administration/Planning

Table 7 - Project Information

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

Because extremely low, low income, and moderate income persons including the elderly and disabled homeowners and renters whom reside throughout the city, housing assistance is available city-wide. The focus of the PY 2019 activities are : housing reconstruction and first time homebuyers education projects will be community activities based on individual income limits which, determines eligibility for program assistance. The project locations are not site-specific at time of planning. The demolition/clearance activities are determined by the time required to obtain releases from property owners and is done on a city-wide, spot basis to prevent slum & blight conditions. The majority of the decayed, deteriorated structures are concentrated in low income areas. Neighborhood Clean-Up activities are restricted to low - moderate income areas, however Chelsea Manor is the focused neighborhood. The primary obstacle to meeting underserved needs is the lack of adequate funding resources and data. The allocation priorities are due to the vetting of each project during the citizen participation process. The need to establish a project where CDBG funds could be expended in a more expeditious manner also, to see and hear a bigger bang for our CDBG bucks.

With so many of our residents having had trouble with rent payments due to COVID-19, the City will provide rental assistance for eligible applicants. The COVID-CV funds will cover up to three months of arrears.

AP-38 Project Summary
Project Summary Information

1	Project Name	Housing Reconstruction (19)
	Target Area	Chelsea Manor
	Goals Supported	Preserve existing Housing Stock
	Needs Addressed	Affordable Housing
	Funding	CDBG: \$250,000
	Description	To assist 2 homeowners with reconstruction of their single-family residential structures.
	Target Date	8/15/2021
	Estimate the number and type of families that will benefit from the proposed activities	1 (one) extremely low-income and 1(one) low to moderate-income with the reconstruction (elderly) of their home in the target neighborhood of Chelsea Manor up to the South side of 9th Ave N which is Snug Harbor Addition.
	Location Description	Although some of the housing in Chelsea Manor is new construction due to damages from Hurricane Ike and Harvey most of the housing is sub-standard. When built they were owner occupied over several years, it has become a hub of high priced rental units to a population of low income minorities. This area is also, high area for the concept of flipping (buying sight unseen). The needs in this area include increased private and public investments, affordable housing if owner-occupied, neighborhood clean-up, and demolition of eye sores with the purpose of reconstruction. Chelsea Manor: From 1765 at Hunter Street to the south side of 9th Avenue North between 14th Street North and 10th Street North
Planned Activities	To reconstruct 2 (two) owner occupied, single family houses for low -mod income homeowners.	
2	Project Name	Neighborhood Revitalization Clean-Up (19)
	Target Area	Chelsea Manor
	Goals Supported	Neighborhood Clean Up
	Needs Addressed	Neighborhood Clean-Up
	Funding	CDBG: \$15,000
	Description	Target Area Chelsea Manor: Owner-Occupied exterior repair and paint program for approximately six low and moderate income homeowners and to revitalize the neighborhood with cleanup, removal of junk, trash, debris and grass and weeds from overgrown vacant lots. To replace worn street signs.
	Target Date	8/12/2020

	Estimate the number and type of families that will benefit from the proposed activities	It is estimated that approximately 100 (one-hundred) low to moderate income homeowners, families, renters and, individuals will benefit from the proposed activity.
	Location Description	Target Area Chelsea Manor / Snug Harbor - from Texas Ave to South side of 9th Ave N between 11th ST N and 13th ST N.
	Planned Activities	To fund neighborhood revitalization efforts through the purchase of paint, street signs and clean-up efforts by removing high grass, junk and debris.
3	Project Name	Housing Counseling (19)
	Target Area	City Wide
	Goals Supported	Preserve existing Housing Stock
	Needs Addressed	Affordable Housing
	Funding	CDBG: \$850
	Description	To assist approximately 10 (ten) first time homebuyers with homeownership educational classes consisting of budgeting, credit repair and home maintenance.
	Target Date	4/22/2020
	Estimate the number and type of families that will benefit from the proposed activities	It is estimated that 10 (ten) households, families, or individuals who are renters will benefit from the proposed activity.
	Location Description	City-Wide
	Planned Activities	Provide direct financial assistance to a HUD approved counseling center for 10 (ten) first time homebuyer's for educational classes of budgeting, managing finances, home maintenance and credit counseling who are purchasing homes in Texas City.
4	Project Name	Demolition/Clearance SB (19)
	Target Area	City Wide
	Goals Supported	Demolition / Clearance Spot Basis
	Needs Addressed	Demolition / Clearance
	Funding	CDBG: \$71,649
	Description	To demolish approximately 20 (twenty) vacant, condemned and deteriorated single family residential structures on a city wide spot basis.
	Target Date	8/2/2020

	Estimate the number and type of families that will benefit from the proposed activities	An estimation for this activity is unknown until an actual location has been identified.
	Location Description	City-Wide; Demolition is an environmentally tiered activity therefore, no addresses have been pre-determined.
	Planned Activities	Demolition / Clearance single family residential structures.
5	Project Name	Administration/Planning (19)
	Target Area	City Wide
	Goals Supported	Neighborhood Clean Up Demolition / Clearance Spot Basis
	Needs Addressed	Affordable Housing Neighborhood Clean-Up Demolition / Clearance
	Funding	CDBG: \$80,000
	Description	General oversight, management, monitoring and coordination of the Community Development Block Grant and activities. Includes preparation of Consolidated Plan, Annual Action Plan and end of the year report Consolidated Annual Performance and Evaluation Report(CAPER); ensuring applicable Federal Statutes and Regulations are followed. Includes general office supplies and the salary of the program Coordinator.
	Target Date	8/15/2020
	Estimate the number and type of families that will benefit from the proposed activities	
	Location Description	
Planned Activities		
6	Project Name	CV-Rental Assistance
	Target Area	
	Goals Supported	
	Needs Addressed	
	Funding	CDBG-CV: \$435,763
	Description	To prevent, prepare for and respond to the Coronavirus.

	Target Date	
	Estimate the number and type of families that will benefit from the proposed activities	
	Location Description	
	Planned Activities	
7	Project Name	CV-Administration/Planning
	Target Area	
	Goals Supported	
	Needs Addressed	
	Funding	CDBG-CV: \$108,941
	Description	General oversight, management, monitoring and coordination of the Community Development Block Grant - Coronavirus and activities. Includes preparation of substantial amendments to the Citizen Participation Plan and the PY2019 Annual Action Plan, as well as the end of the year report Consolidated Annual Performance and Evaluation Report(CAPER); ensuring applicable Federal Statutes and Regulations are followed. Includes general office supplies and the salary of the Program Coordinator.
	Target Date	
	Estimate the number and type of families that will benefit from the proposed activities	
	Location Description	
	Planned 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

The geographic areas where assistance will be directed are: . **CT. 7222**; Block 2; its boundaries are from Bay St to 5th St N between 3rd Ave N & 7th Ave N; this area is 75.81% low-mod. **CT. 7222; Block Group 3**; its boundaries are from 5th St N to 10th St N between 6th Ave N & 13th Ave N; this area is 79.17% low-mod. **CT. 7222; Block Group 4**; its boundaries are from Bay St to 11th St N between 1765 & 5th Ave N; this area is 90.58% low-mod. **CT. 7223 Block Group 1**; its boundaries are from 9th St N to 14th St N between 5th Ave N & 13th Ave N; this area is 82.61% low-mod. **CT. 7223 Block Group 2**; its boundaries are from 11th St N to 15th St N; between 1765 & 5th Ave N; this area is 79.19% low-mod. **CT. 7223; Block Group 3**; its boundaries are from 15th St N to 20th St N; between 1765 & 5th Ave N; this area is 88.16% low-mod. **CT. 7223; Block Group 4**; its boundaries are from 23rd St N to 27th St N between 1765 & 1764; this area is 57.75% low-mod. **CT. 7223; Block Group 5**; its boundaries are from 14th St N to 23rd St N between 1765 & 13th Ave N; this area is 62.43% low-mod. **CT. 7227; Block Group 1**; its boundaries are from Hwy. 3 to Westward between Woodrow & 1764; this area is 61.68% low-mod. **CT. 7231; Block Group 3**; its boundaries are from Noble to Vicksburg between Monticello & 2004; this area is 72.59% low-mod. **CT. 7262; Block Group 1**; its boundaries are from 1765 to 8th Ave S between 21st ST N & 27th St N; this area is 78.53% low-mod.

Geographic Distribution

Target Area	Percentage of Funds
Low and Moderate Income Areas	
Chelsea Manor	
City Wide	

Table 8 - Geographic Distribution

Rationale for the priorities for allocating investments geographically

Under the Five-Year strategic plan, the community goals and principals were identified to help guide the City through the development process. It was determined that not all geographical low and moderate income areas have the same needs. In order to service the needs of each area the investments has to be on an area basis. Based on HUD'S Summary information for basic demographic data of Chelsea Manor which is a targeted geographically investment area there were 720 families with income in the past 12 twelve months below poverty level. Families in poverty that owned and occupied their homes equal 169 or 23.47% of homeowners below poverty and families that rented and occupied a property were 551 or 76.53%. The median Family Income is \$34,377 whereas, the MSA is \$71,500. The median

age of the housing is 51 plus years and the area has a low homeownership rate. The neighborhood was targeted because of its obvious decline and exhibits traits that contribute to blight conditions, such as dilapidated housing, vacant lots, high crime, unkept properties, and low homeownership rates. Priority for the Community Development Block Grant Funding under this initiative, will utilize the “Optional Reconstruction activity in the target neighborhood.

Discussion

Affordable housing continues to be one of Texas City's Community Development's highest priorities. Affordable housing is what keeps our communities thriving; Texas City has a majority of owner-occupied housing with households at extremely low, low, moderate and fixed incomes. Housing repairs cost are high and does not leave the home up to code in all components. With the repair program it is hard to see where the funds were actually used. For the PY 2019 the city has deleted the repair program and will focus on housing reconstruction.

Affordable Housing

AP-55 Affordable Housing – 91.220(g)

Introduction

The City of Texas City offers supportive services available to those who may be at risk of becoming homeless. The City also, provides information about funding availability that addresses emergency shelter and transitional housing. Some of the many service providers to the homeless, as well as those at risk of becoming homeless, are the following: The City of Texas City has not used CDBG funds for homeless prevention due to the capacity of the small Community Development Department and the lack or reliable data on its homeless population in the city. The City does not have a facility for any special needs persons with AIDS/HIV or for the chronic homeless. The primary obstacle to meeting underserved needs is the lack of adequate resources and funding. The Community Development Department provides technical assistance, informational data, statistics and support to non-profit service providers, other Cities, the local Housing Authority and others to identify program guidelines, funding opportunities and other technical issues raised. The City will assist low-moderate income families and individuals with first time homeownership opportunities and supports the agencies that provide services to the home population. HRA VILLAGE: Provides a safe, financially stable living environment to persons with disabilities. 4C's Clinic Galveston County Health District. Provides assistance with food, clothing, medications, and transportation. Enrolls homeless persons in the County Health District Indigent Health Care Program. The Salvation Army: Provides assistance through case management, with rent and utility assistance, food, clothing. The Jesse Tree Offers comprehensive services to very low and low-income persons, including the homeless. Services include rent and utility assistance, food, prescriptions and medical supplies. Mainland United Way: Provides community social service agencies with funds. Catholic Charities: Provides rent and utility assistance, deposits for rent/utilities, food, clothing, household furnishing, as well as case management. St .Vincent DePaul: Provides food, clothing and households furnishings. The Texas City Housing Authority (TCHA): Provides rental assistance, and housing inspections through the Section 8 Housing Choice Voucher Program and Public Housing Program. The City will continue to acts as a referral services to these agencies that assist homeless with enrollment in mainstream programs. Staff will continue having Fair Housing educational workshops and providing fair housing fact sheets and other educational materials about the existence of fair housing laws to the community various Financial Lending Institutions, Real Estate Boards and Mortgage Companies.

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	2
Rehab of Existing Units	0
Acquisition of Existing Units	5
Total	7

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

Discussion

It is the mission and intention of the Community Development to assist as many eligible homeowners as possible maintain a safe, decent and sanitary home. However, due to the age and deterioration of the housing stock, the environmental climate (Gulf of Mexico salt water and high humidity) the presence of lead based paint, the homeowners inability to make needed repairs, and the non-intrusive nature of the rehabilitation inspections has led to a condition where certain structures require an extensive amount of rehabilitation. Currently, the preservation of existing structures through minor and emergency cannot be accomplished with limited funds. During the PY 2019 the City proposes to provide 7 households with safe, and decent housing, 5 (five) through activities that provide direct financial assistance to first time homebuyers 2 (two) affordable and decent homes through reconstruction.

AP-60 Public Housing – 91.220(h)

Introduction

The Housing Authority of the City of Texas City's Board of Commissioners consists of five (5) citizens that are appointed by the Mayor of the City of Texas City. The Board of Commissioners serve staggered terms; two (2) two (2) year terms and three (3) one (1) year term. The Executive Director is hired by the Board of Commissioners of the Housing Authority. All other employees of the Housing Authority are hired by the Executive Director. All contracting and procurements over \$5,000 is approved by the Board of Commissioners. At this time no proposed demolition or disposition of public housing developments are expected. Proposed developments are being investigated.

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

There are no new planned activities for the next year.

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

The Texas City Housing Authority as well as, the City are both encouraging public housing residents to become more involved in management and to participate in becoming homeowners. At this time we do not have any programs designed for this endeavor.

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

N/A

Discussion

The Texas City Housing Authority (TCHA) provides affordable housing services to more than 450 low-income residents including the administration of over 250 affordable housing vouchers and services in the City of La Marque. The TCHA has seventy four (74) scattered site units that house families, individuals, elderly and person with special needs.

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

Introduction

The City of Texas City offers supportive and informational services available to those who may be "at risk" of becoming homeless. The City also, provides information regarding homeless services and funding opportunities that addresses emergency shelter and transitional housing. Some of the many service providers in our area that services the homeless, as well as those at risk of becoming homeless are: *4C's Clinic -Galveston County Health District. Provides assistance with food, clothing, medications, and transportation. Enrolls homeless persons in the County's Health District Indigent Health Care Program.*The Salvation Army -Provides assistance through case management, with rent and utility assistance, food, clothing.*The Jesse Tree -Offers comprehensive services to very low and low-income persons, including the homeless. Services include rent and utility assistance, food, prescriptions and medical supplies.*Mainland United Way -Provides community social service agencies with funds.*Catholic Charities -Provides rent and utility assistance, deposits for rent and utilities, food, clothing, household furnishing, as well as case management.*St .Vincent DePaul -Provides food, clothing and households furnishings.*Texas City Housing Authority (TCHA) -Provides rental assistance, and housing inspections through the Section 8 Housing Choice Voucher Program and Public Housing Program.

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

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

The City will continue to acts as a referral service to the agencies that assist the homeless enrollment into mainstream programs as well, as support with technical assistance. While significant and great improvements have been made, significant future funding increases will be required to adequately address homelessness in the area. The Community Development Department will provide technical assistance, informational data, statistics and support to non-profit service provides preparing grant applications and searching for funding or exploring future funding opportunities.

Addressing the emergency shelter and transitional housing needs of homeless persons

Due to the small facility and staff Texas City Community Development Department will provide technical assistance, informational data, statistics and support to non-profit service providers of the homeless as well as, continue to work with the Texas Homeless Network to identify those that are homeless or in risk of becoming homeless and provide. Will provide a referral service to the agencies that administer homeless services.

Helping homeless persons (especially chronically homeless individuals and families, families

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

The City of Texas City has not used CDBG funds for homeless prevention due to the capacity of the Community Development Department and the lack of reliable data on its homeless population in the city. The City does have some facilities for special needs individuals such as the Galveston County adult day for ages 18-25 from 8:00 am to 4:30 pm. The City will continue to provide referral services to agencies that administer services, informational and, statistics data to non-profit service providers, other Cities , the local Housing Authority and others to wanting to identify funding opportunities.

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.

Communities across the county are harnessing data to make informed decisions regarding their local housing crisis response to homelessness. Accountability and data are the keys to continuous improvement. The Coordinator Entry System makes referral's to all projects in the community that are dedicated to servicing 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 The City will continue to acts as a referral service to the agencies that assist the homeless enrollment into mainstream programs as well, as support with technical assistance. The Community Development Department will provide technical assistance, informational data, statistics and support to non-profit service providers preparing grant applications and searching for funding or exploring future funding opportunities.

Discussion

Because of the limited CDBG funding that Texas City receives, and the fact that it is not an Emergency Solutions Grant recipient, the City can do little to directly assist the homeless. The majority of emergency shelters and housing programs are provided more in the City of Galveston and throughout

Galveston County and are often available throughout all of the MSA. In an effort to stem the rise of homelessness throughout the city and its surrounding areas, the City of Texas City will continue to support public service agencies and providers by offering technical assistance, informational and, statistical data.

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

Introduction:

Texas City will address the market conditions that hinder low- and moderate-income persons from obtaining decent housing by increasing the supply of affordable housing through housing reconstruction of existing units that warrant more than \$5,000 repair cost. A reconstructed home lowers the cost of home maintenance for low- and moderate income seniors, households and families. The City will continue to assist low-and moderate income families in achieving homeownership by assisting with down payment and closing cost assistance. With the addition of the housing counseling component. The city will no longer invest in code enforcement of neighborhoods but will continue to Revitalize the targeted neighborhood of Chelsea Manor.

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

Public policies such as zoning regulations and districts can have a negative effect on affordable housing and residential investment. The City of Texas City uses it for the following purposes (not all inclusive):

- To promote the health, safety, morals and the general welfare of the city;
- To ensure safe, orderly and efficient development expansion To avoid the undue concentration of population; To lessen congestion in the streets To facilitation the adequate provision of transportation, water, sewerage, schools, parks and other public requirement (etc.) The city will continue to review its building policies, codes and ordinances for any negative effects on housing used or constructed for the city's low and moderate income households, families and individuals.

Discussion:

In the upcoming year, the following new and continued policy actions will be undertaken to foster, maintain and eliminate barriers to affordable housing: Continue to focus CDBG funds on the needs of affordable housing, on housing owned by low-moderate income elderly and disabled individuals, in low-moderate neighborhoods that are deteriorating or sub-standard and eligible for reconstruction assistance. The City will continue to assist low-moderate income families and individuals with first time homeownership opportunities and will aid in preserving the integrity, value, and safety in low-moderate income neighborhoods while improving the desirability and accessibility through neighborhood clean up efforts. Provide fair housing educational workshops, fair housing fact sheets and other educational materials about the existence of fair housing laws to the communities various financial lending institutions, real estate boards and mortgage companies.

AP-85 Other Actions – 91.220(k)

Introduction:

The city of Texas City estimates that it will use approximately \$337,499 in CDBG funds during PY 2019 for activities that benefit persons of low-moderate-income. In addition to providing the proposed activities, the City of Texas City has estimated that the following percentage of funds will be dedicated to the following target areas: Affordable Housing = \$250,000 or 59%; Public Service = \$15,000 or 3 %; Slum and Blight Prevention = \$71,649 or 17 %; Housing Counseling = \$ 850 or 0.2 and Administration = \$80,000 or 19%. In order for the development, conservation and expansion of affordable housing and neighborhood revitalization to be successful, it is important that non-housing community needs also be addressed. During the 2019 PY the city will focus efforts to enhance the environment of low-moderate income persons by improving the availability of services to those individuals through the following public service activities: Provide for neighborhood clean up services (mowing) Install new street signs and stop signs where need in the targeted area.

Actions planned to address obstacles to meeting underserved needs

The primary obstacle to meeting underserved needs is the lack of adequate resources and funding. The community development department will continue to provide technical assistance, informational data, statistics and support to non-profit service providers such as habitat for humanity, other city departments, the local Housing Authority and others in identify funding opportunities and additional resources.

Actions planned to foster and maintain affordable housing

In a continuous effort to foster, maintain and eliminate barriers to affordable housing, the City will focus CDBG funds on the needs of the existing housing stock. Housing owned by low-moderate income elderly and disable individuals in low-moderate neighborhoods that are in need of repair and eligible for rehabilitation assistance. The City will assist low-moderate income families and individuals with first time homeownership opportunities. Staff will have quarterly Fair Housing educational workshops and provide fair housing fact sheets and other educational materials about the existence of the fair housing law to the community, landlords, various financial lending institutions, real estate boards and mortgage companies.

Actions planned to reduce lead-based paint hazards

The City in consultation with the Galveston County Health District and poison control center in PY 2017, 2018, and today have identified six (6) cases of elevated blood lead levels (EBLL) within the Texas City area. The county health district not only identifies these cases by address they also, track them by zip

code. There has been three (3) case of EBLL reported in each of the City's low-moderate income zip code area of 77590 and three (3) in zip code area 77591. This information has changed from the 2015 consultation. The City will continue to collaborate with the health district to monitor every report to ensure that the number of EBLL cases in the City does not continue to increase, the City will also continue to distribute lead-based paint information and protection instructions to residents. With the program redesign of reconstructed homes the lead-based paint reduction should be greatly reduced.

Actions planned to reduce the number of poverty-level families

- Develop funding priority strategies that meet the needs of our residents
- Develop a vision for Texas City's future that seeks to improve economic opportunity and quality of life for all residents
- Seek out opportunities that will reduce unemployment
- Seek out educational opportunities for extremely-low, low- and moderate-low income individuals
- Provide homebuyers counseling and seminars for low-and moderate-income renters

Some of the specific goals and strategies that will positively impact and potentially decrease persons below poverty are: To create a healthy, diversified local economy by identifying and qualifying support industries for relocation to Texas City (job creation). Create a greenbelt / barrier between industry and residential areas which is predominately home to the very low and low-income residents (overall health and safety). Establish adequate, affordable housing for all income levels by providing a variety of housing for all price ranges, including public housing (affordable housing). Improve accessibility, traffic flow and safety by implementing a community-wide public transportation system (mobility). Develop modern and adequate public and drainage facilities especially for problem streets that are prone to flood which are in predominately very low and low to moderate income neighborhoods (sustainable communities) and; Create effective public safety programs with emphases on community involvement and education.

Actions planned to develop institutional structure

The city of Texas City coordinates and administers its housing and community development efforts through the community development department. The department functions as a liaison with community groups, non-profit services providers, public and private organizations and other governmental entities to share information, identify resources and coordinate when possible community development activities. Several formal organizations exist to aid in this coordination: Texas City housing authority, gulf coast center, college of the mainland and the chamber of commerce. Staff will continue to participate with these organizations as well as reach out to other organizations.

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

During the upcoming year the city will again seek to work with any interested organization to expand the development of affordable housing. City staff will work within its own reconstruction program along with the Housing Authority, Habitat for Humanity, the Gulf Coast Center, the Gulf Coast Homeless Coalition and the Galveston County Housing Assistant Program and any other public or private entity that serves low to moderate income individuals, families and persons with disabilities. When requested, City staff will provide technical assistance and organizational support for non-profit service providers researching funding or filing out applications for funding for services for low to moderate income individuals.

The city of Texas City offers supportive services available to those who may be “at risk” of becoming homeless and provides information about funding availability that addresses emergency shelter and transitional housing. The city will refer individuals and families to one of the many service providers in our area that services the homeless, as well as those at risk of becoming homeless are.

Discussion:

In a continuous effort to foster, maintain and eliminate barriers to affordable housing, the city will focus CDBG funds on the needs of affordable housing, on housing owned by low-moderate income households, individuals, families, the elderly and disabled individuals, in low-moderate neighborhoods that are deteriorating or sub-standard and eligible for reconstruction assistance when feasible. The City will assist low-moderate income families and individuals with first time homeownership opportunities and will aid in preserving the integrity, value, safety in low-moderate income neighborhoods while improving the desirability and accessibility neighborhood clean up activities that revitalizes the area. Staff will continue Fair Housing outreach, educational workshops, providing fair housing fact sheets and other educational materials about the existence of the fair housing choice and laws targeting local financial lending institutions, real estate agencies and mortgage companies.

Program Specific Requirements

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

Introduction:

The City expects to receive in PY 2019 an allocation of \$417,499 in Community Development Block Grant funds (CDBG) to perform affordable housing activities of reconstruction, housing counseling along with direct assistance financial assistance for first time homebuyers. The City will expend funds to perform neighborhood clean up activities in the targeted area of Chelsea Manor with revitalization efforts by replacing old stop signs, street signs and lighting. To prevent slum and blight the City will under take demolition activities on a spot bases throughout the city.

Community Development Block Grant Program (CDBG)

Reference 24 CFR 91.220(I)(1)

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

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

Other CDBG Requirements

1. The amount of urgent need activities	0
2. The estimated percentage of CDBG funds that will be used for activities that benefit persons of low and moderate income. Overall Benefit - A consecutive period of one, two or three years may be used to determine that a minimum overall benefit of 70% of CDBG funds is used to benefit persons of low and moderate income. Specify the years covered that include this Annual Action Plan.	80.00%

For the current year the city of Texas City estimates that it will use approximately \$337,499 in CDBG funds during the 2019 PY for activities that benefit persons of low-moderate-income. In addition to providing the proposed activities, the city has determined that Program Years 2017, 2018 and 2019 will be determined that a minimum overall benefit of 70% of CDBG funds is used to benefit persons of low and moderate income.

