



# 5-Year Strategic Plan for League City, Texas

This document includes Narrative Responses to specific questions that grantees of the Community Development Block Grant, HOME Investment Partnership, Housing Opportunities for People with AIDS and Emergency Shelter Grants Programs must respond to in order to be compliant with the Consolidated Planning Regulations.

## GENERAL

### Executive Summary

**The Executive Summary is required. Include the objectives and outcomes identified in the plan and an evaluation of past performance.**

The geographic area of the jurisdiction is the City Limits of the City of League City, Texas. Within the City are areas of low- to moderate-income concentrations that comprise the Community Development Block Grant (CDBG) Target Areas. Geographically-based assistance will be concentrated in these Target Areas, while assistance to individuals or households will be city-wide based on needs and income. For most Entitlement Jurisdictions (EJs) throughout the nation, Target Areas must have a population that is at least 51% low- to moderate-income. However, some EJs, particularly suburban EJs, have an exception to the 51% regulation. The City of League City currently is required to have at least 37.34% low-to moderate-income residents within its Target Areas. Low- to moderate-income is defined as those households earning 80% or less of the area median income (AMI – Harris and Galveston Counties) by household size. The eligible Target Areas have been defined based on the 2007 low- to moderate-income data at the Census Block Group level as provided by HUD and based on 2000 Census data.

Although more recent income data are available at the Block Group level, the data are not cross-tabulated by household size. Therefore, any post-2007 changes in the Target Area boundaries must be reliant on the Census Bureau conducting a special tabulation for HUD and HUD's release of data based on income by household size. Beginning in 2001, the Census Bureau ceased conducting a sample survey of economic and specific demographic conditions for the decennial census and instituted the American Community Survey (ACS).

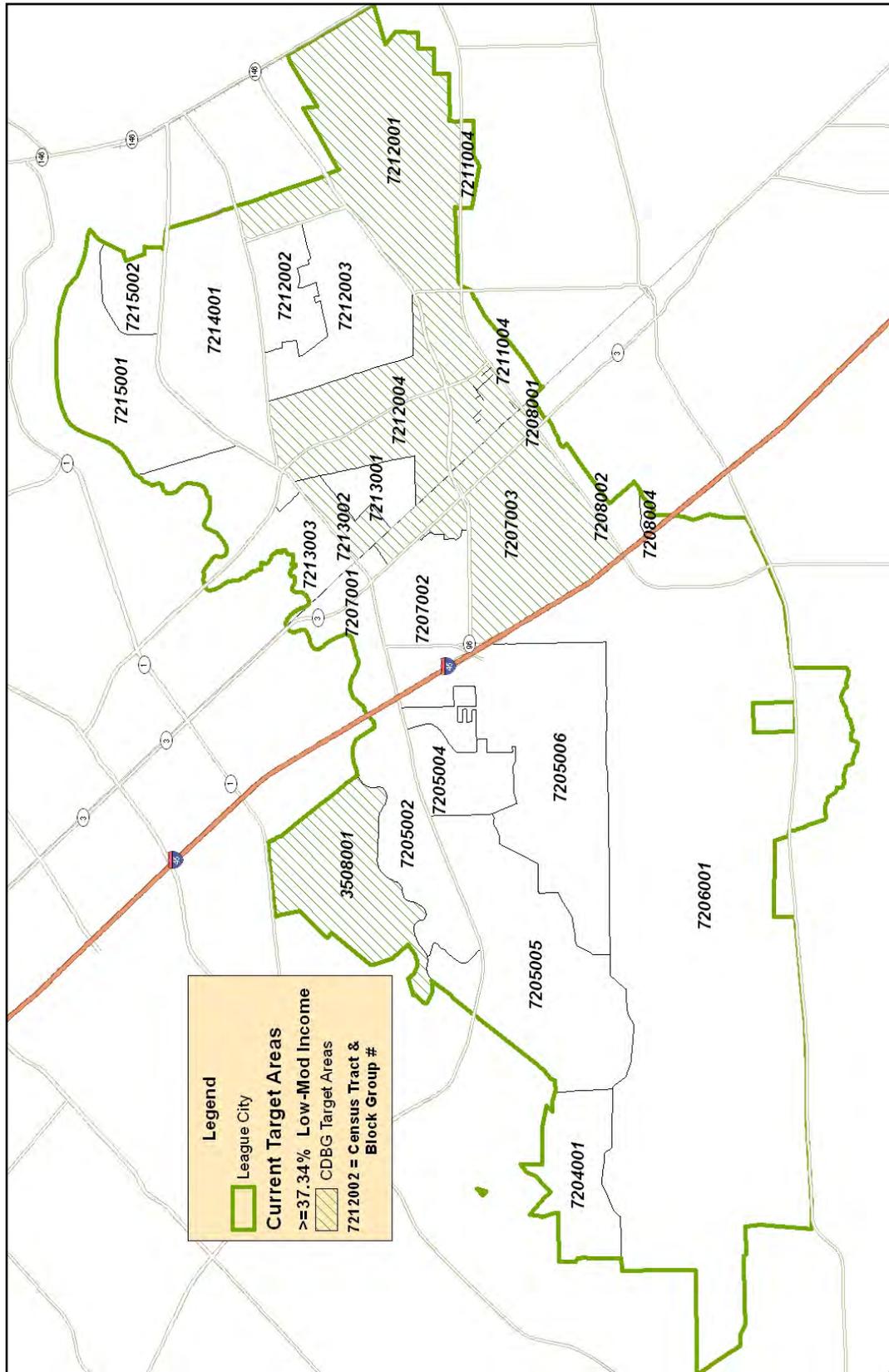
The ACS is a survey of income, education, and employment, among other variables, and is conducted on a small number of different households each month. The monthly results are tabulated, aggregated and averaged for an estimate of current conditions. The national, state, county and large city data are provided annually. Smaller city and large Census Tract data are provided based on a 3-year average. Smaller Census Tract and Block Group data are provided based on a 5-year average. Income by household size is a special tabulation to be requested by HUD. Until those figures are released, the only available estimate of the percent of low- to

moderate-income residents is the percent of total households regardless of household size earning 80% or less of the overall AMI.

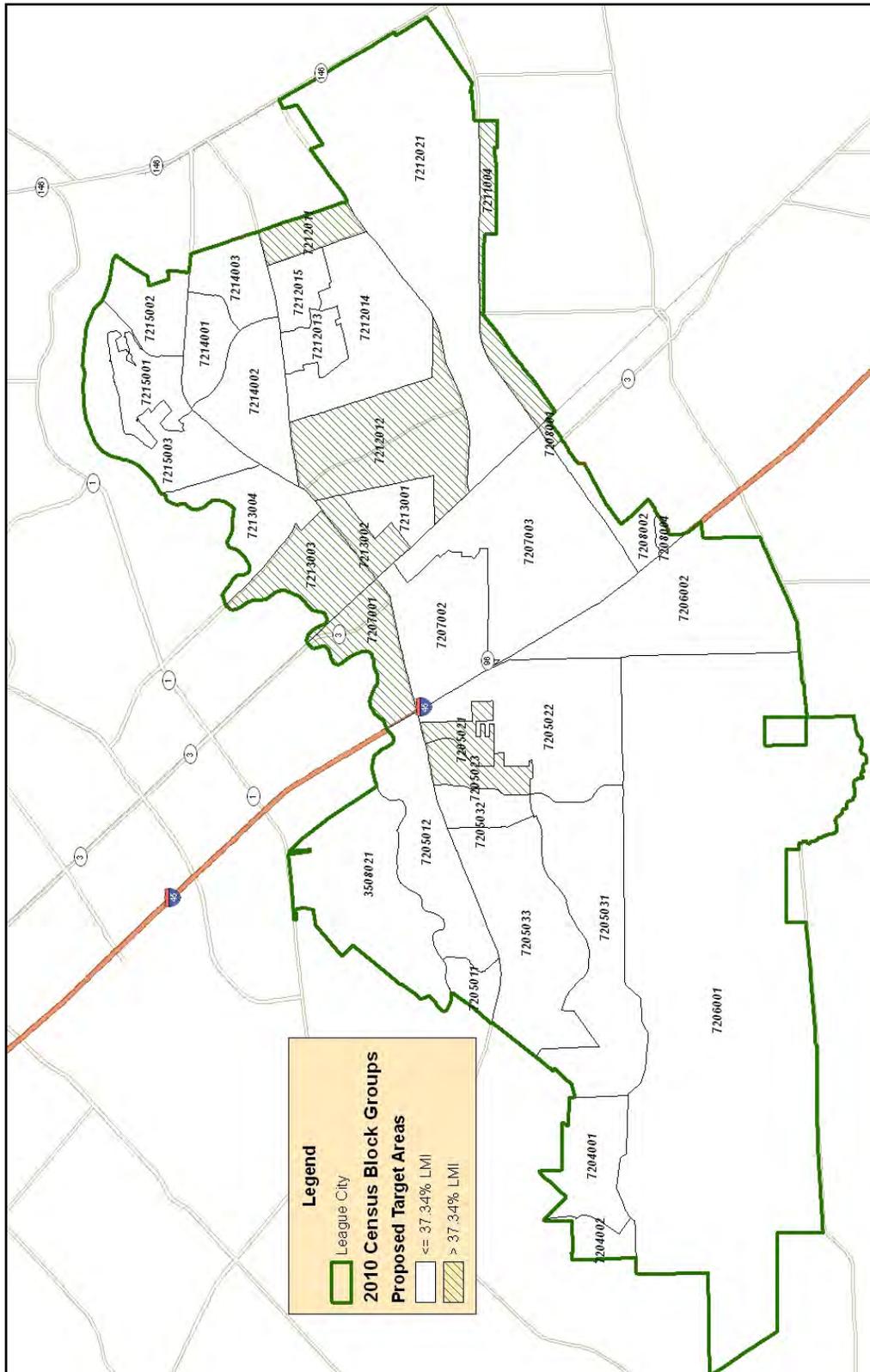
For the vast majority of Entitlement Jurisdictions, HUD requires Target Areas to have at least 51% low- to moderate-income households. Several EJs, particularly suburban cities, have an exception to the "51% rule". The HUD regulations state that at least 25% of the Census Block Groups within an EJ must qualify for low- to moderate-income status. To determine the exception, all Block Groups are ranked from highest percent low- to moderate-income to lowest percent and the top 25% of the Block Groups are selected. If the last eligible Block Group of the top 25% has less than 51% low- to moderate-income households, that percentage becomes the accepted exception. League City now has 36 whole or partial Block Groups, up from 25 in 2000, with the 9 highest concentration of low- to moderate-income comprising the eligible Target Areas. Using the 2006-2010 ACS data, the ninth Block Group falls just above 37.34% low- to moderate-income, with the tenth Block Group just below 37.34%. Therefore, the 37.34% exception appears still to be valid for League City.

The map on the next page shows the current Target Area boundaries using 2000 Census geography and 2000 Census data provided in 2007 by HUD. Following the map of current Target Areas is a map of proposed Target Areas using those Block Groups with at least 37.34% of the households earning 80% or less of the Area Median Income, regardless of household size. In addition to the change in percent of low- to moderate-income within Block Groups, the actual Census Tract and Block Group boundaries have changed. The first map uses 2000 Census geography while the second map uses 2010 Census geography.

**Map 1—Current Approved Target Areas  
(based on 2007 HUD-provided Block Group Income Data)**



Map 2 – Proposed Target Areas using 2010 Census Geography  
(2006-2010 American Community Survey Data)



The City of League City allocates area-wide investments within the eligible Block Groups. Until the final income-by-household size data are released, League City will allocate area-wide investments in Block Groups that fall within both the current 2007-based Target Areas and the proposed 2012 Target Areas. Upon the release of the most recent income-by-household size data, League City will reassess the Target Area boundaries and amend the Consolidated Plan as needed.

**Table 1 – Comparison of Current & Proposed Target Areas**

2000 Census w/ 2000 Geography			2006-2010 ACS w/ 2010 Geography		
Tract	Block Group	Percent Low-Mod	Tract	Block Group	Percent Low-Mod
350800	1	59.4			
			720502	1	43.7
			720502	3	46.9
			720700	1	45.7
720700	3	48			
720800	1	71.4	720800	1	82.8
			721100	4	55.3
721200	1	41.4			
721200	4	47.1			
			721201	1	39.1
			721201	2	47.0
721300	2	51.3	721300	2	56.7
			721300	3	45.6

The process and basis for assigning the priority given to each category of need was based on input from a variety of sources:

Objective quantitative information from:

- Census Bureau – 2006-2010 American Community Survey (disability, language, education, housing age, persons per room, housing conditions, housing costs as percent of income, household structure, and PUMS cross-tabulation data);
- Housing needs from the Comprehensive Housing Affordability Strategy (CHAS) tables and the Housing Affordability Mismatch table, both provided by HUD from the 2005-2009 American Community Survey;
- State of Texas (health insurance, medical professionals, substance abuse, mental illness, disabilities, Low Income Housing Tax Credit properties, environmental issues, lead poisoning information, and Texas State Data Center’s population forecasts);
- City League City (infrastructure, parks, code enforcement, non-residential structures, vacancies, delinquent taxes, CIP plans, Comprehensive Plan, Parks Master Plan, and ordinances);
- Real Estate files (available for sale and for rent housing by value or rent and foreclosures);
- Federal Finance Institution (Housing Mortgage Disclosure Act data on disposition of loan applications);
- Gulf Coast Homeless Coalition; and
- Subrecipient client data

Qualitative information from:

- Subrecipients and other non-profit service providers; and

- Houston-Galveston Area Council

Subjective information from:

- Subrecipients and other non-profit service providers;
- Residents and other responders to survey; and
- City staff

Estimates of quantifiable need for each HUD Matrix Code were developed. From these needs and the feedback from the subrecipients, area agencies, residents, City staff, City Council, and the consultant, the priorities were set. Priorities were based on the level of need, need as a percent of total population, criticalness of need (hazardous to life, hazardous to health/well-being, detrimental to quality of life, detrimental to vibrancy, and viability of the City), as well as the ability of existing providers to meet the need and the likelihood of the need to be addressed during the next 5 years.

The main obstacle to meeting underserved needs is money. This situation is especially true with the recession the country is facing at this time. Not only are needs increasing dramatically due to the stresses of the economic recession, but available funds from foundations and private donations are down considerably. Even in the best of economic times, the CDBG allocation plus the funds available from other Federal grants, foundations and private donations cannot begin to address all of the needs of League City residents.

A second obstacle to meeting underserved needs also is the 15% cap for public services placed by legislation on HUD's CDBG program. The City of League City sees a great need for and benefit from allocating a larger percentage of the CDBG allocation to public service projects that can reach the needs of low- to moderate-income residents throughout the City. The small annual CDBG allocation is not sufficient to fund extensive infrastructure, facility or housing improvement projects and a greater positive result would come from spending more on public services to help meet the growing needs in the community.

A third obstacle is the shortage of viable accessible entities to provide some of the needed services. There are small non-profits with little or no capacity to address some of the most critical needs, such as those residents with mental illness, mental disabilities, physical disabilities or HIV/AIDS. Due to the low number of residents who have need for such specialized assistance, there is not the critical mass to warrant nearby comprehensive services. Therefore, most must go to Houston where a number of related services can be provided within a very small and accessible geographic area. As a result, many of those needing such services are forced to relocate to Houston to have access to programs. It becomes a two-edged sword – lack of sufficient numbers to warrant increased levels of service results in the potential clients that do live in League City having to relocate to accessible services, thus further lowering the local need.

Related to this conundrum of critical mass and accessible services is the issue of transportation. The City of League City has no public transit system making intra-city and inter-city transportation difficult or impossible for many. One nonprofit transportation agency has developed and is expanding from transporting children to include transporting elderly, disabled and other low-income residents of League City.

Despite the obstacles, the City intends to address the needs of the low- to moderate-income residents through:

- Installation and improvements to infrastructure, particularly water/sewer lines, roadways and sidewalks;
- Improvements to storm drainage, including open ditches and retention ponds;
- Code enforcement;
- Improvements to public areas and parks;
- Housing rehabilitation;
- Emergency utility and rental assistance;
- Programs for the elderly;
- Counseling and services to at-risk and low-income children and youth
- Services to victims of domestic violence;
- Transportation services to the low- to moderate-income, elderly, and disabled;
- Assistance to small and micro-enterprise businesses; and
- Improvements to Main Street corridor and storefronts

The table below, from the CPMP tool, shows the priority rating for all eligible activities and the number of unduplicated service units (people, properties, projects) to be completed during the next 5 years.

**Table 2 – Priority Ratings and Proposed Unduplicated Service Units**

Community Development Activities		5-Year Goal	Priority Rating
01 Acquisition of Real Property 570.201(a)		0	L
02 Disposition 570.201(b)		0	L
Public Facilities Improvements	03 Public Facilities and Improvements (General) 570.201(c)	0	M
	03A Senior Centers 570.201(c)	0	M
	03B Handicapped Centers 570.201(c)	0	M
	03C Homeless Facilities (not operating costs) 570.201(c)	0	L
	03D Youth Centers 570.201(c)	0	M
	03E Neighborhood Facilities 570.201(c)	0	M
	03F Parks, Recreational Facilities 570.201© (Improvements)	2	H
	03G Parking Facilities 570.201©	1	M
	03H Solid Waste Disposal Improvements 570.201(c)	0	L
	03I Flood Drain Improvements 570.201(c) (Project)	1	H
	03J Water/Sewer Improvements 570.201(c) (Feet)	200	M
	03K Street Improvements 570.201(c) (Feet)	500	H
	03L Sidewalks 570.201(c) (Feet)	1,000	H
	03M Child Care Centers 570.201(c)	0	L
	03N Tree Planting 570.201(c)	0	M
	03O Fire Stations/Equipment 570.201(c)	0	M
	03P Health Facilities 570.201(c)	0	L
	03Q Abused and Neglected Children Facilities 570.201(c)	0	L
	03R Asbestos Removal 570.201(c)	0	L
	03S Facilities for AIDS Patients (not operating costs) 570.201(c)	0	L
03T Operating Costs of Homeless/AIDS Patients Programs	0	L	
04 Clearance and Demolition 570.201(d)		1	M
04A Clean-up of Contaminated Sites 570.201(d)		0	M
Public Services	05 Public Services (General) 570.201(e) (people)	20	M
	05A Senior Services 570.201(e) (people)	60	H
	05B Handicapped Services 570.201(e) (people)	0	M
	05C Legal Services 570.201(E) (people)	0	M
	05D Youth Services 570.201(e) (people)	250	H
	05E Transportation Services 570.201(e) (people)	50	H
	05F Substance Abuse Services 570.201(e) (people)	0	L
	05G Battered and Abused Spouses 570.201(e) (people)	25	M
	05H Employment Training 570.201(e) (people)	0	M
	05I Crime Awareness 570.201(e)	0	M
	05J Fair Housing Activities (if CDBG, then subject to 570.201(e))	1	M
	05K Tenant/Landlord Counseling 570.201(e) (people)	0	L
	05L Child Care Services 570.201(e) (people)	0	L
	05M Health Services 570.201(e) (people)	0	M
	05N Abused and Neglected Children 570.201(e) (people)	20	h

	05O Mental Health Services 570.201(e) (people)	0	L
	05P Screening for Lead-Based Paint/Lead Hazards Poison 570.201(e)	0	M
	05Q Subsistence Payments 570.204 (people)	200	H
	05R Homeownership Assistance (not direct) 570.204 (people)	0	M
	06 Interim Assistance 570.201(f)	15	H
	10 Removal of Architectural Barriers 570.201(k)	10	H
	11 Privately Owned Utilities 570.201(l)	0	L
	15 Code Enforcement 570.202(c)	45	H
	16B Non-Residential Historic Preservation 570.202(d)	0	M
	17A CI Land Acquisition/Disposition 570.203(a)	0	L
	17B CI Infrastructure Development 570.203(a)	0	L
	17C CI Building Acquisition, Construction, Rehabilitation 570.203(a)	0	L
	17D Other Commercial/Industrial Improvements 570.203(a) (properties)	5	M
	18A ED Direct Financial Assistance to For-Profits 570.203(b) (properties)	2	M
	18B ED Technical Assistance 570.203(b) (properties)	5	M
	18C Micro-Enterprise Assistance (properties)	5	M
	19C CDBG Non-profit Organization Capacity Building	5	H
	19D CDBG Assistance to Institutes of Higher Education	0	L
	19E CDBG Operation and Repair of Foreclosed Property	0	L
	20 Planning 570.205	0	M
	21A General Program Administration 570.206	3	H
	21B Indirect Costs 570.206	0	M
	21D Fair Housing Activities (subject to 20% Admin cap) 570.206	1	H
	21E Submissions or Applications for Federal Programs 570.206	0	H
	22 Unprogrammed Funds	0	L
<b>CDBG</b>	Acquisition of existing rental units	0	L
	Production of new rental units	0	L
	Rehabilitation of existing rental units	0	L
	Rental assistance (multiple consecutive months)	10	H
	Acquisition of existing owner units	0	L
	Production of new owner units	0	L
	Rehabilitation of existing owner units	0	M
	Homeownership assistance	0	M

**Past Performance:** During the past 3 years, the City has used CDBG funds to focus on the Shellside community, public services throughout the City, and begin improvements in the Main Street/Park Avenue area. The City completed the water and sanitary sewer line installations in Shellside and provided housing rehabilitation in Shellside as well as throughout the City. Code enforcement and neighborhood clean-ups were conducted primarily in Shellside, with limited activities in other Target Areas. The result of these activities has been to bring an underserved, disadvantaged neighborhood to the level of services as the remainder of the City. Preliminary income data indicate that Shellside no longer qualifies as a Target Area, though the average household size is large and may result in eligibility once income by household size data are available. However, the percent low- to moderate-income will be considerably lower than in 2000, indicating that the improvements made in the area have resulted in economic benefits to the community.

With the completion of the majority of the projects in the Shellside area, the City is now concentrating on the Main Street/Park Avenue area. The City used CDBG-R funds to install a sidewalk along Park Avenue to improve access to League City Elementary, to the new location of Interfaith Caring Ministries and from the low- to moderate-income areas south of Main to retail establishments along Main Street and to the north of Main. The City is currently developing a public park at League City Elementary in collaboration with the Clear Creek Independent School District. League City Elementary is located at Park Avenue and E. Walker three blocks south of Main Street. This will be the only park in the general vicinity. Also, during the past 3 years, the City has collaborated with the private sector to ensure the demolition of an abandoned and dangerous apartment building within the Main Street/Park Avenue CDBG Target Area at no cost to the City or CDBG. A multi-phase program for improving the Main Street corridor, coordinating multiple funding sources, has begun with the Park Avenue sidewalk and the League City Elementary School public park as part of the overall plan.

The City used CDBG funds to match Department of Energy American Recovery and Reinvestment Act funds to provide energy efficiency improvements in homes of low- to moderate-income residents, with priority given to the elderly and disabled. During the past 3 years, the City has conducted housing rehabilitation on 40 owner-occupied homes as part of the energy efficiency and Shellside utility connection programs.

During the past 3 years, the City has funded 5 public service programs: League City Parks Department's Seniors program; Interfaith Caring Ministries utility and rental assistance program; Communities in Schools counseling for at-risk youth; St. Christopher Episcopal Church's community garden that provides food to the Interfaith Caring Ministries food bank; and the YMCA's program that provides water safety and swimming lesson scholarships to low-income children and youth. Between October 1, 2009 and March 31, 2012, 1,203 (this is through PY 2010) have been assisted with CDBG funds. This figure includes 49 through the Parks Department's Seniors program; xxx through utility and rental assistance; xxx through the counseling of at-risk youth; and 638 through the community garden. The YMCA received its first funding in PY 2011 for scholarships during the summer of 2012 and has not begun its CDBG-funded activities at this time.

## STRATEGIC PLAN

**Due every three, four, or five years (length of period is at the grantee's discretion) no less than 45 days prior to the start of the grantee's program year start date. HUD does not accept plans between August 15 and November 15.**

**Mission:** *The Mission of the City of League City's Community Development Block Grant program is to provide low to moderate income residents in our community with suitable living environments. This is accomplished by enabling them to live in decent, affordable housing and by expanding their economic opportunities.*

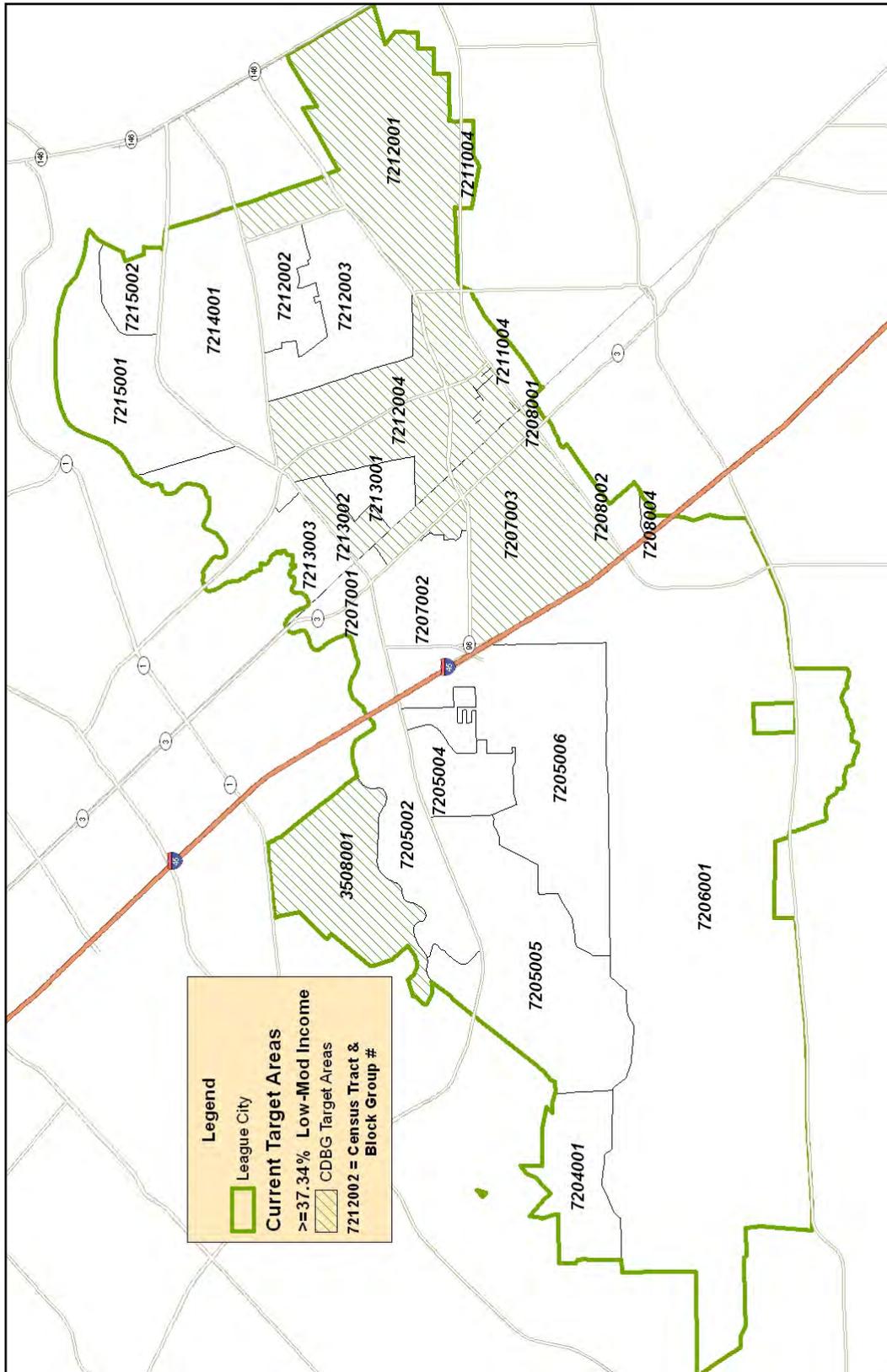
### General Questions

- 1. Describe the geographic areas of the jurisdiction (including areas of low income families and/or racial/minority concentration) in which assistance will be directed.**

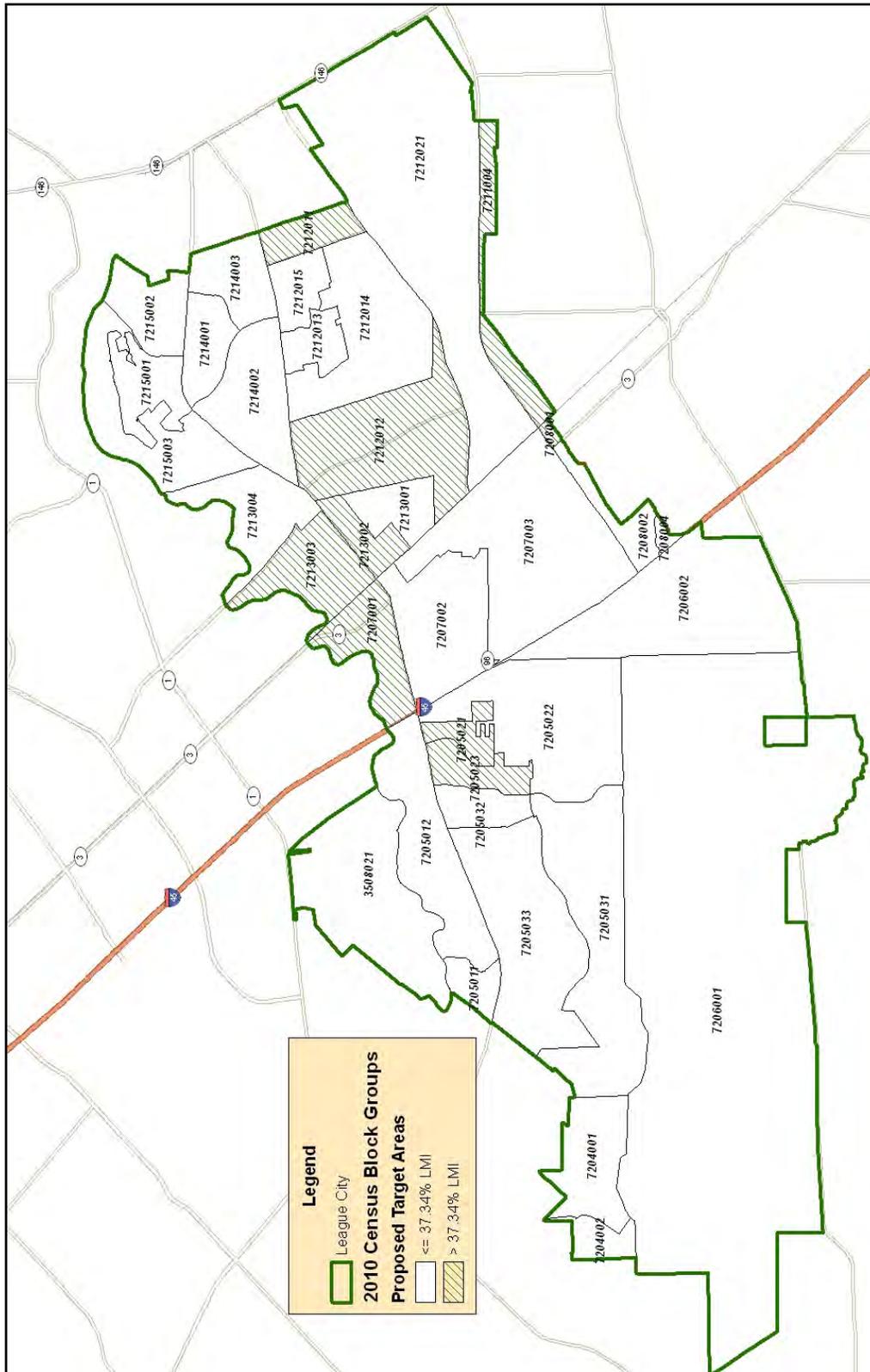
The geographic area of the jurisdiction is the City Limits of the City of League City, Texas. Within the City are areas of low- to moderate-income concentrations that comprise the Community Development Block Grant (CDBG) Target Areas. Geographically-based assistance will be concentrated in these Target Areas, while assistance to individuals or households will be city-wide based on needs and income. The maps below show the location and City Limits of League City as well as the current CDBG Target Areas and the proposed CDBG Target Areas. For most Entitlement Jurisdictions (EJs) throughout the nation, Target Areas must have a population that is at least 51% low- to moderate-income. However, some EJs, particularly suburban EJs, have an exception to the 51-percent regulation. The City of League City currently is required to have at least 37.34% low- to moderate-income residents within its Target Areas. Although HUD has not released new low- to moderate-income percentages at the Block Group level from post 2000 American Community Survey (ACS) data, the City has developed a map of proposed Block Groups that are likely to be eligible at 37.34% or greater low- to moderate-income concentrations.



**Map 4—Current Approved Target Areas  
(based on 2007 HUD-provided Block Group Income Data)**

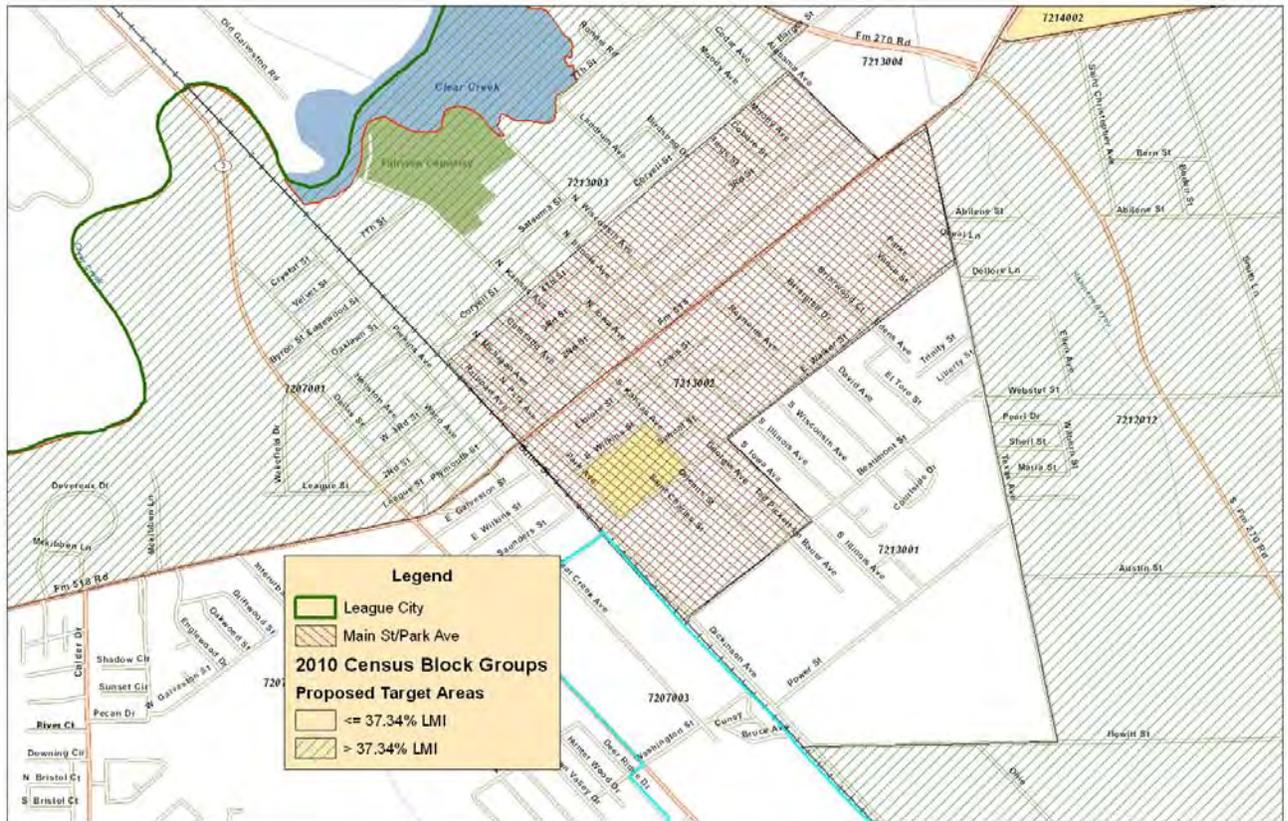


Map 5 – Proposed Target Areas using 2010 Census Geography  
(2006-2010 American Community Survey Data)



The City of League City determined that the most effective method for providing area-based services and enhancements to the city would be to focus on one Target Area at a time. During the first 7 years, the City focused on the Shellside community, an area without City utilities. As the work in this area reached completion in PY 2009, the City has determined that the next area for concentration would be the Main Street/Park Avenue area. This area has deteriorating water and wastewater lines and streets, no parks, sidewalks or storm sewers and limited street lighting. The area has an elementary school and public service agencies as well as being adjacent to the historic district and Founder's Park. The CDBG funding in this area will augment General Funds and other federal and state funding to preserve and enhance the historic character of the overall area, improve the economic viability of the Main Street corridor and provide improved services to the residents of the area. The map below shows the Main Street/Park Avenue area.

Map 6 – Main Street/Park Avenue Target Area



**Table 3 – Comparison of Current & Proposed Target Areas**

2000 Census w/ 2000 Geography			2006-2010 ACS w/ 2010 Geography		
Tract	Block Group	Percent Low-Mod	Tract	Block Group	Percent Low-Mod
350800	1	59.4			
			720502	1	43.7
			720502	3	46.9
			720700	1	45.7
720700	3	48			
720800	1	71.4	720800	1	82.8
			721100	4	55.3
721200	1	41.4			
721200	4	47.1			
			721201	1	39.1
			721201	2	47.0
721300	2	51.3	721300*	2	56.7
			721300*	3	45.6

\* Main Street/Park Avenue Target Area (all of 721300/BG2 and part of 721300/BG 3

**2. Describe the basis for allocating investments geographically within the jurisdiction (or within the EMSA for HOPWA) (91.215(a)(1)) and the basis for assigning the priority (including the relative priority, where required) given to each category of priority needs (91.215(a)(2)). Where appropriate, the jurisdiction should estimate the percentage of funds the jurisdiction plans to dedicate to target areas.**

The City of League City determined that the most effective method for providing area-based services and enhancements to the City would be to focus on one Target Area at a time. During the past 7 years, the City focused on the Shellside area, an area without City utilities. As the work in this area reached completion in PY 2009, the City determined that the next area for concentration would be the Main Street/Park Avenue area. This area has deteriorating water and wastewater lines and streets, no parks, no sidewalks or storm sewers and limited street lighting. The area has an elementary school and public service agencies as well as being adjacent to the historic district and Founder’s Park. The CDBG funding in this area will augment General Funds and other federal and state funding to preserve and enhance the historic character of the overall area, improve the economic viability of the Main Street corridor and provide improved services to the residents of the area.

Public Service funds will be spent at the maximum allowed 15% each year. Services to be funded are dependent upon agencies applying to become subrecipients. It is anticipated that the City will fund utility and rental assistance, counseling for at-risk youth, and other services to children, youth and/or elderly. The services will be provided city-wide and based on the individual applicant’s income.

The City will continue to provide code enforcement/neighborhood clean-up activities. General code enforcement – investigation/citation/remediation – and neighborhood clean-up activities will be conducted throughout all of the CDBG Target Areas. Emphasis will be given to the Main Street/Park Avenue area. Compassionate code

enforcement – repairs to the exteriors and properties of owner-occupied houses – will be conducted city-wide for low- to moderate-income residents who are unable to bring their properties up to code without assistance. Although any low- to moderate-income homeowner can qualify, priority will be given to the elderly and disabled residents of the Main Street/Park Avenue area.

Pending securing a qualified nonprofit to manage the project, the City anticipates providing minor housing rehabilitation to owner-occupied dwelling of the low- to moderate-income, particularly the elderly and disabled living in the Main Street/Park Avenue area.

### **3. Identify any obstacles to meeting underserved needs (91.215(a)(3)).**

Due to the relatively small CDBG allocation each year, the primary obstacle to meeting the underserved needs of League City is money. Each year League City allocates the maximum allowed 15% of its CDBG award to public service agencies which serve low- to moderate-income residents throughout the city. While these funds are vital to the provision of services, they can only address a small portion of those in need. The economic crisis facing the nation, Texas and Galveston County has drastically reduced the availability of foundation, corporate funding, and individual contributions to nonprofit public service agencies.

A second obstacle to meeting the underserved needs is the limited number of public service and community-based organizations with the capacity to manage federal funds and carry out the activities. The City of League City is continuing to encourage new and small nonprofits to apply for CDBG funds and other federal, state, local and private dollars. The City provides technical assistance to these organizations in capacity building and program development. Currently, the City is encouraging nonprofits with housing rehabilitation experience to apply for funding so that CDBG funds can be efficiently and effectively used to provide minor rehabilitation, energy efficiency improvements and code compliance assistance to low- to moderate-income homeowners.

## **Managing the Process (91.200 (b))**

### **1. Lead Agency. Identify the lead agency or entity for overseeing the development of the plan and the major public and private agencies responsible for administering programs covered by the consolidated plan.**

The City of League City is the lead agency, with the Planning Department assigned to carry out the management of the CDBG program. The Finance Department works with Planning Department staff in fiscal management of the program. In addition, the City of League City contracts with a consulting firm to assist in the development of various HUD-mandated documents, such as the Consolidated Plan, Annual Action Plans, and Consolidated Annual Performance and Evaluation Reports (CAPERs).

**2. Identify the significant aspects of the process by which the plan was developed, and the agencies, groups, organizations, and others who participated in the process.**

The City of League City developed this 5-Year Consolidated (Strategic) Plan using existing demographic data along with information provided through a number of data providers, including HUD, the Census Bureau, the Texas State Data Center, State of Texas, and the U.S. Departments of Labor, Education, and Health. The City also obtained maximum input into the process and resulting information from residents, City departments, developers, surrounding jurisdictions, nonprofit agencies, and regional agencies including Houston-Galveston Area Council (the regional Council of Governments), and the Gulf Coast Homeless Coalition.

Beginning with the 2010 Census and the 2006-2010 American Community Survey by the Census Bureau as the base information, the City then extracted data from various State and local agencies regarding the number of League City residents in need of services. These included the number of:

- at risk students;
- participants in the Texas Council on Alcoholism and Drug Abuse (TCADA) programs;
- arrests for drug related crimes or DUI;
- adults and children without health insurance;
- children tested for lead poisoning and the rate of elevated blood lead levels;
- people living with HIV/AIDS;
- mentally disabled population;
- victims of domestic violence, child neglect or abuse and/or elder abuse;
- estimated homeless population;
- current unemployment estimates; and
- current foreclosures

The City also extracted data from the needs and service level information provided by applicants for CDBG funding. Local housing market data also were collected and analyzed, including housing available for sale or rent by location and cost.

Each year, the City hosts a pre-plan public hearing and pre-application workshop to explain the CDBG process, gather citizen input into the needs assessment process and process and to give public agencies the opportunity to articulate their needs and priorities as well as those of their clients. Residents are invited and encouraged to participate in the public hearing. This year, the City notified the agencies and the general public that it had provided an on-line survey that could be completed anonymously. Paper copies were made available to those individuals without computer access. The results are in the Citizen Participation Section and were used in the development of the priority needs tables. The survey is included in the attachments.

**3. Describe the jurisdiction's consultations with housing, social service agencies, and other entities, including those focusing on services to children, elderly persons, persons with disabilities, persons with HIV/AIDS and their families, and homeless persons.**

**\*Note: HOPWA grantees must consult broadly to develop a metropolitan-wide strategy and other jurisdictions must assist in the preparation of the HOPWA submission.**

The City met in person or via telephone with the Houston-Galveston Area Council (the regional Council of Governments), each of the identified social service agencies serving League City, Southeast Texas Housing Finance Corporation (SETH), the Coalition for the Homeless of Houston/Harris County, the Gulf Coast Homeless Coalition and the Texas Homeless Network. In each conversation, the City or its consultant requested information pertaining to the social, housing, economic and environmental issues facing League City and its residents as well as possible solutions. The consultations resulted in a number of issues specific to League City and to most suburban communities:

- How will the older, more “modest” homes hold their value over time with the large amount of vacant, developable land available for new housing;
- How will suburban communities like League City address the needs of the elderly population, particularly in the area of transportation;
- The home-bound elderly and disabled are in increased need for services such as home-delivered hot meals, visiting nurses programs and the like;
- There needs to be an adequate life-cycle mix of housing and amenities in League City;
- Transportation is a crucial issue in League City – pedestrian, bicycle and public transportation, with pedestrian and bicycle trails going to specific destinations rather than strictly for recreational purposes;
- Traffic circulation in League City needs to be improved;
- League City provides the most employment opportunities and mature economic base of the suburban cities around Houston, however with the changes in NASA’s focus, the aerospace industry is seeing significant downturns and new industries must be developed;
- Though League City has extensive undeveloped area available, unlike many suburban cities, League City is expending considerable resources in maintaining and enhancing the older areas to stabilize them and continue to provide quality amenities to older and lower-income residents;
- Despite the existence of the Bay Area Turning Point shelter for victims of domestic violence or sexual assault, there are no homeless shelters or transitional housing developments in or near League City;
- Interfaith Caring Ministries provides single-month rental assistance but the majority of their clients need at least 3 months of assistance to prevent rather than postpone homelessness and League City does not qualify for Emergency Solutions Grant funds and did not receive Homeless Prevention and Rapid Rehousing funds;
- The economies of scale or critical mass do not exist in suburban areas like League City to make shelters, transitional housing, permanent supportive housing viable for agencies to develop; and
- Due to the distance to the concentration of public service agencies in and near downtown Houston, coupled with the lack of public transportation outside of Harris County, residents of League City are not able to access a number of needed services.

## Citizen Participation (91.200 (b))

### 1. Provide a summary of the citizen participation process.

The development of both the Consolidated Plan and the Annual Action Plan is a collaborative process in designing and establishing the community's vision for community development actions. Citizen participation is a critical element. The City provides the opportunity for resident involvement in the development of the 5-Year Consolidated Plan and Annual Action Plans through 2 public hearings and a 30-day comment period on the draft plans. In addition, the City presents the draft plans, including preliminary funding recommendations for the Annual Action Plan to City Council at a Council meeting for comment and vote. The Council Agenda is posted on the City's municipal access channel and website and residents may come and speak before City Council regarding the program and the process. The City encourages participation and comments from residents residing in the designated CDBG-priority neighborhoods, minorities, persons with disabilities, and the non-English speaking population.

The City of League City hosted a public hearing on March 12, 2012 that focused on the priorities and needs of the community. Notice of the resident and stakeholder survey was presented with notice of the public hearing and during the public hearing. A second public hearing was hosted on xxxxxxxx focusing on the results of the 5-Year Consolidated Plan and the Annual Action Plan. In addition, a City Council meeting included information about the CDBG program, proposed priorities and the Consolidated and Annual Action Plans. This meeting was open to the public and the public was encouraged to speak about the program, priorities and the current year funding recommendations. Throughout the year, the City meets regularly with a number of nonprofit agencies, civic associations and community groups to discuss the CDBG program and local funding priorities. In addition, the City develops partnerships with other entities to enhance services. Currently, the City is in partnership with Clear Creek Independent School District to blend CDBG funds and CCISD funds for the development and maintenance of a public park at League City Elementary School, in the City's new focused Target Area.

Interested residents are encouraged to send comments in writing or to otherwise contact City officials to discuss any issues regarding the CDBG program. At every CDBG-related meeting, the City directs the public to the agencies currently receiving CDBG funds.

The Community Development public hearings discussed the CDBG program, the Consolidated and Annual Action Plan process, eligible activities, and Fair Housing rights and issues. The hearings then opened the floor to comments, concerns, rating of issues and recommendations.

The City posted a survey on its website and notified the public through the public notice in the newspaper, on the City website and through notices to the public service agencies asking for participation. A copy of the survey is included in the attachments. The responses were used in conjunction with the comments from public service agencies and community leaders to develop the priorities for the next 5 years. A copy of the survey is included in the attachments. The next table shows

the average scores for each question in the survey. Each item could be rated from 1 to 5 with 1 being “very low need” and 5 being “very high need”.

**Table 4 – Results of the Public On-Line Survey  
(on a scale of 1 to 5, with 5 being the greatest need)**

<b>Please rank the following owner-occupied housing needs in League City:</b>		<b>Please rank the following public facilities needs in League City:</b>	
Minor Rehabilitation	2.66	Multi-service/Recreational Facility	3.03
Major Rehabilitation	2.46	Public Neighborhood Parks	3.03
Demolition/Reconstruction	2.17	Senior Center	2.81
Construction of New Affordable Housing	2.32	Day Center for the Disabled	2.42
Energy Efficiency Improvements	3.41	Child Care Center	2.46
Downpayment Assistance	2.27	Improved Flood Control/Drainage	3.34
Housing Counseling	2.81	Improved Water/Sanitary Sewer Lines	3.26
		Improved streets	3.05
		Improved Sidewalks/Street Lighting	3.55
		Historic preservation	2.89
<b>Please rank the following rental housing needs in League City:</b>		<b>Please rank the following social service needs in League City:</b>	
Minor Rehabilitation	2.73	Services for abused/neglected children	2.36
Moderate or Major Rehabilitation	2.47	Services for victims of domestic violence	2.25
Demolition/Reconstruction	2.52	Services and shelter for homeless	1.72
Assisted Facilities for Frail Elderly	2.77	Legal services	2.14
Assisted Facilities for Disabled	2.47	Child care	2.44
Apartments for Elderly	2.78	Youth services	2.74
Handicapped-Accessible Apartments	2.61	Senior services	2.83
Rental Units for Small Households	2.06	Handicapped services	2.53
Rental Units for Large Households	1.72	ESL/Literacy education/Adult education	2.14
		Mental health & substance abuse services	2.25
		Emergency, interim assistance	1.89
		Health services	2.53
		Transportation services	3.17
		Employment training/Job placement	2.47
		Economic or Micro-business programs	2.72
		Crime prevention/awareness	3.17

On **July 10, 2012** the City of League City posted the Consolidated Plan and Annual Action Plan for public comment. Prior to the comment period, an advertisement was published in the general-circulation newspaper to solicit public comments and inviting the public to review the both plans. The draft plans were available for review on the City’s website, at City Hall and at Helen Hall Library. On **July 9, 2012**, the City held a second public hearing to allow residents to hear more about the processes and CDBG, to discuss Fair Housing and to provide an additional forum for comments regarding the Action Plan. A copy of the plans were available for review at the public hearing.

On June 23, 2009 the City Council of the City of League City voted to approve the funding recommendations and on August 11, 2009 voted to approve both the Consolidated Plan and the PY 2009 Annual Action Plan pending additional comments from the public. No written comments were received during the 30-day comment period of July 10, 2009 to August 10, 2009.

The City of League City will continue to encourage citizen participation, with particular emphasis on participation by persons of very-low, low, and moderate income who are eligible for CDBG-funded services and residents of Target Areas in which funds are proposed to be used. All subrecipient agencies will be provided information regarding the CDBG program for distribution to clients. The Target Area to receive the greatest focus during the next 5 years has both the City's Planning Department and Interfaith Caring Ministries located in it. The City will ensure that both locations have information about the CDBG program and how residents can participate.

**2. Provide a summary of citizen comments or views on the plan.**

**Public Comments here**

**3. Provide a summary of efforts made to broaden public participation in the development of the consolidated plan, including outreach to minorities and non-English speaking persons, as well as persons with disabilities.**

The City of League City has made every effort to broaden public participation in the development of both the Consolidated Plan and the Annual Action Plans by hosting day and evening public hearings, asking public service agencies to notify their clients of the hearings, ensuring that notice of the City Council meetings are available and that time is provided at each meeting for public comment. In addition, this year we posted a survey on the City website in English and Spanish and placed a link on the City's homepage to the survey. **A copy of the survey is included in the attachments.**

It is anticipated that as the City moves its infrastructure work into the Main Street/Park Avenue area, more visible to the majority of the residents and located near City Hall and the City Hall annex, social service agencies and the satellite Planning Department offices, that more residents will be encouraged to seek information about CDBG and will speak with staff concerning their issues and needs.

**4. Provide a written explanation of comments not accepted and the reasons why these comments were not accepted.**

**\*Please note that Citizen Comments and Responses may be included as additional files within the CPMP Tool.**

The City accepts and responds to all comments.

## **Institutional Structure (91.215 (i))**

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

The Planning Department of the City of League City is the manager of the CDBG program, with the occasional assistance of an on-call contract consultant. The Planning Department's Planning Technician will carry out the day-to-day activities, with the Senior Planner overseeing the program. The Director of Planning will be the ultimate staff member responsible for the program and will report to the Director of Land Management in the City Administrator's office, who reports to the Mayor and City Council. The Finance Department will administer the financial reporting, disbursement of funds and management of the award. The Engineering Department will administer the construction projects, such as infrastructure improvements.

The City will work cooperatively within its own structure to administer the CDBG program with the least amount of additional funding and staff required. However, the City cannot successfully fulfill its obligations within a vacuum. Therefore, the City will continue to rely on nonprofit agencies, Galveston County, Harris County, the Gulf Coast Homeless Coalition, the Houston-Galveston Area County and the State of Texas to ensure that the maximum level of need is met in the most cost-effective manner possible. The City will contract as much of the work to qualified nonprofits as is possible. In addition, the City will work closely with the service providers and advocates to determine levels of need, quality of services in meeting the need and methods of funding services.

The City's goal is to use the majority of the CDBG funds as matching and leveraging for other programs, thus greatly enhancing the positive impact of the program. To accomplish this goal, the City will work closely with the service providers, client advocates and the funding agencies – both public and private. The City will work closely with Galveston County and the Bay Area Economic Development Council. The City, through staff and contract consultants, will provide technical assistance to agencies in the area of fund procurement.

The City will monitor and assess the administrative effectiveness of the current structure and modify systems as needed. In addition, the City will monitor all subrecipients on at least a semi-annual basis and provide technical assistance when non-compliance issues arise.

The City will enhance its institutional structure by attending HUD-sponsored workshops and conferences throughout the year.

### **2. Assess the strengths and gaps in the delivery system.**

Two major strengths in the delivery system are the expertise of staff and the availability and expertise of the City's CDBG consultant. The Director of Land Management has previous experience in the Community Development departments of both the City of Houston and Harris County. The Senior Planner, though new to

League City, has worked with CDBG in the past as a staff member of subrecipient agencies. The Planning Technician has been assigned to CDBG for 4 years.

A major gap in the delivery system is a result of the limited funding available through CDBG for administrative purposes. There is not sufficient funding allowed to fully staff a Community Development division or department. Therefore, the City must rely on staff members who are assigned fully to CDBG but funded only in part to the program.

The City encourages the inclusion of new service providers and, as such, requires additional time in technical assistance and training to bring new agencies smoothly and seamlessly into the process.

As with most suburban cities, League City does not have the social service infrastructure to provide all necessary services to residents in need or at risk. Most social service providers must locate near the highest concentration of potential clients, being downtown Houston or on Galveston Island. League City has no public transportation and only very limited private on-demand van service. Without the strong cadre of providers or transportation in League City, there is a gap in the delivery system.

**3. Assess the strengths and gaps in the delivery system for public housing, including a description of the organizational relationship between the jurisdiction and the public housing agency, including the appointing authority for the commissioners or board of housing agency, relationship regarding hiring, contracting and procurement; provision of services funded by the jurisdiction; review by the jurisdiction of proposed capital improvements as well as proposed development, demolition or disposition of public housing developments.**

Neither the City of League City nor Galveston County has a Public Housing Agency or Section 8 Housing Choice Voucher program. Therefore, this is not applicable.

**Monitoring (91.230)**

**1. Describe the standards and procedures the jurisdiction will use to monitor its housing and community development projects and ensure long-term compliance with program requirements and comprehensive planning requirements.**

The City of League City's monitoring strategy is designed to assist staff in fulfilling its regulatory obligations in monitoring subrecipients, including City departments, as well as assist subrecipients in best serving their consumers. The primary purpose for this monitoring strategy is to ensure proper program performance, financial performance and regulatory compliance in accordance with HUD Regulations. The secondary purpose is to ensure that the funded agencies are providing the best and most cost effective services possible and that they are positioned to access additional funding from non-HUD sources.

Staff will continue to have the responsibility to ensure that each subrecipient, including each recipient City department, is adhering to their approved scope of service, budget and service of schedule. Each subrecipient or City department must also abide by the regulatory guidelines set forth by HUD in providing benefits to low-to moderate-income persons and/or eliminating a slum or blighted condition.

The monitoring process is an on-going one of planning, implementation, communication and follow-up. A major component of the monitoring process is the review of all documents submitted with the quarterly reimbursement requests. 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 is conducted 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 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 turnovers, reporting problems, or monitoring findings.

Monitoring provides a basis for assessing a program's operations and identifying problems. Another goal of monitoring is to obtain ongoing data for use in determining program achievement. Evaluations will summarize monitoring findings and program goals and measure progress toward those goals during the provision of services. Clear record keeping requirements for programs are essential for grant accountability. Responsibility for maintaining many of the records is assigned to the subrecipients and City departments. This includes responsibility for documenting activities with special requirements, such as necessary determinations, income certifications or written agreements with beneficiaries, where applicable.

The on-site monitoring process consists of the monitors examining time records, client files, financial records, equipment and machinery. The monitors discuss security measures that a subrecipient or City department has in place to avoid theft of federally-funded purchases, if applicable. The monitors examine all HUD-funded equipment or machinery for the City's identification number. This is done to ensure that any equipment or machinery purchased with CDBG funds is being used to meet a national objective and also to ensure that any equipment purchased with CDBG funds through a subrecipient will be used to meet said objective.

At the beginning of the Program Year, the staff meets with each subrecipient to provide reporting forms, discuss expectations and enter into a 12-month contract for services. For prior-year subrecipients, this also serves as a time to conduct a year-end monitoring. The meeting instructs subrecipients in pertinent policies and procedures, regulations and OMB circulars, expectations of service and detailed explanations of each reporting form and in-house file structure that each agency must maintain.

Before staff conducts the actual on-site monitoring visit, a pre-monitoring contact is made with the designated person(s) of the subrecipient agency or City department to discuss the overall expectations, information to be viewed and site visits. This allows

staff the opportunity to discuss solutions to possible problems that may have occurred from past experiences with a particular subrecipient or City department.

The procedure for conducting the monitoring consists of the following:

1. Prior to the actual award of contracts, the staff holds a required meeting with all subrecipients. At that time the monitoring procedures, reporting procedures and expectations are discussed and reporting forms provided in hard-copy and electronic formats.
2. On at least a quarterly basis, each subrecipient submits reimbursement requests, back-up documentation and completed reporting forms. The staff reviews each document for accuracy and completeness.
3. On a semi-annual basis, each subrecipient or City department is notified of a date, time and place for an on-site monitoring and information that will be viewed and discussed.
4. A conference is held with a Board Member, Executive Director or Department Head as well as staff persons working with or salaried through the program or activity being funded.
5. The actual monitoring visit is conducted by completing the monitoring interview form, viewing documentation and if applicable, viewing rehabilitated sites, structures and the like.
6. Monitoring visits conclude with staff advising the subrecipient of any deficiencies.
7. When/if deficiencies or findings occur, a monitoring letter is transmitted advising of the deficiencies or findings (which are violations of laws or regulations which can result in the deobligation of funds), concerns (which could result in a finding if not properly corrected).
8. Staffmembers then work with subrecipients to assist in rectifying the deficiencies, concerns or findings.

During a monitoring visit the monitors have the right to view any and all files that are related to a particular program or activity that is being funded with CDBG funds. In addition, the following files are to be provided to the City with the reimbursement request:

- Quarterly Beneficiary and Progress Reports for City departments are due on or before the 10<sup>th</sup> working day of each month following the end of the quarter. Continual delays may affect future funding allocations.
- Copies of invoices, canceled checks, etc. are requested as documentation along with the Quarterly Beneficiary, Progress and Expenditure Reports.
- Any subrecipient that expends \$500,000 or more in federal funds in one (1) year must have an independent audit performed that complies with the OMB Circular A-133 Single Audit Act.

The Engineering staff is responsible for monitoring all CDBG-funded infrastructure construction and rehabilitation activities. In addition, the Planning staff monitors all construction activities for Davis-Bacon Wage Rate compliance and other labor relations regulations.

The City of League City's CDBG Program must meet all requirements set forth by the U.S. Department of Housing and Urban Development and the Office of Management and Budget. The City conducts an independent audit annually to ensure that CDBG funds are used in accordance with program requirements. The City also conducts an independent Single Audit annually in compliance with the OMB Circular A-133 Single Audit Act.

The monitoring strategy is designed to be an effective, productive and collaborative effort between the City's Planning Department and subrecipients or contractors of the CDBG Program to assist them in efficiently providing the best services to low- to moderate-income residents of League City.

## **Priority Needs Analysis and Strategies (91.215 (a))**

### **1. Describe the basis for assigning the priority given to each category of priority needs.**

The process and basis for assigning the priority given to each category of need was based on input from a variety of sources:

Objective quantitative information from:

- Census Bureau – 2010 Census (population, race/ethnicity, housing, group quarters and the 2008-2010 city-wide and the 2006-2010 census tract and block group level American Community Survey (disability, language, education, housing age, persons per room, housing conditions, housing costs as percent of income, household structure);
- Housing needs from the post-2000 Comprehensive Housing Affordability Strategy (CHAS) tables based on the 2005-2009 American Community Survey and the 2000 Housing Affordability Mismatch table updated based on the post-2000 CHAS;
- State of Texas (health insurance, medical professionals, substance abuse, mental illness, disabilities, Low Income Housing Tax Credit properties, environmental issues, lead poisoning information, and Texas State Data Center's population forecasts);
- City of League City (infrastructure, parks, code enforcement, non-residential structures, vacancies, delinquent taxes, CIP plans, Comprehensive Plan, Parks Master Plan, and ordinances);
- 2012 Real Estate files (available owner and renter-occupied housing by value or rent and foreclosures);
- 2010 Housing Mortgage Disclosure Act data;
- Gulf Coast Homeless Coalition data from the latest Continuum of Care application; and
- Subrecipient client data.

Qualitative information from:

- Subrecipients and other non-profit service providers;
- Houston-Galveston Area Council;
- Gulf Coast Homeless Coalition;
- Other social service providers in the area;

Subjective information from:

- Subrecipients and other non-profit service providers;
- Residents and other responders to surveys;
- City staff;
- Community stakeholders;
- Consultants; and

- Advocacy groups.

Estimates of quantifiable need for each HUD Matrix Code were developed as a result of the input from all sources. From these needs and the feedback from the subrecipients, area agencies, residents, City staff, City Council, and the consultant, the priorities were set. Priorities were based on the level of need, need as a percent of total population, and criticalness of need (hazardous to life/health/well-being, detrimental to quality of life, detrimental to viability of City), as well as the likelihood of the need to be addressed during the next 5 years.

**Table 6 – Priority Ratings and Proposed Unduplicated Service Units**

Community Development Activities		5-Year Goal	Priority Rating
01 Acquisition of Real Property 570.201(a)		0	L
02 Disposition 570.201(b)		0	L
Public Facilities Improvements	03 Public Facilities and Improvements (General) 570.201(c)	0	M
	03A Senior Centers 570.201(c)	0	M
	03B Handicapped Centers 570.201(c)	0	M
	03C Homeless Facilities (not operating costs) 570.201(c)	0	L
	03D Youth Centers 570.201(c)	0	M
	03E Neighborhood Facilities 570.201(c)	0	M
	03F Parks, Recreational Facilities 570.201© (Improvements)	2	H
	03G Parking Facilities 570.201©	1	M
	03H Solid Waste Disposal Improvements 570.201(c)	0	L
	03I Flood Drain Improvements 570.201(c) (Project)	1	H
	03J Water/Sewer Improvements 570.201(c) (Feet)	200	M
	03K Street Improvements 570.201(c) (Feet)	1,000	H
	03L Sidewalks 570.201(c) (Feet)	1,500	H
	03M Child Care Centers 570.201(c)	0	L
	03N Tree Planting 570.201(c)	0	M
	03O Fire Stations/Equipment 570.201(c)	0	M
	03P Health Facilities 570.201(c)	0	L
	03Q Abused and Neglected Children Facilities 570.201(c)	0	L
	03R Asbestos Removal 570.201(c)	0	L
03S Facilities for AIDS Patients (not operating costs) 570.201(c)	0	L	
03T Operating Costs of Homeless/AIDS Patients Programs	0	L	
04 Clearance and Demolition 570.201(d)		1	M
04A Clean-up of Contaminated Sites 570.201(d)		0	M
Public Services	05 Public Services (General) 570.201(e) (people)	20	M
	05A Senior Services 570.201(e) (people)	60	H
	05B Handicapped Services 570.201(e) (people)	0	M
	05C Legal Services 570.201(E) (people)	0	M
	05D Youth Services 570.201(e) (people)	250	H
	05E Transportation Services 570.201(e) (people)	50	H
05F Substance Abuse Services 570.201(e) (people)	0	L	

	05G Battered and Abused Spouses 570.201(e) (people)	25	M
	05H Employment Training 570.201(e) (people)	0	M
	05I Crime Awareness 570.201(e)	0	M
	05J Fair Housing Activities (if CDBG, then subject to 570.201(e))	1	M
	05K Tenant/Landlord Counseling 570.201(e) (people)	0	L
	05L Child Care Services 570.201(e) (people)	0	L
	05M Health Services 570.201(e) (people)	0	M
	05N Abused and Neglected Children 570.201(e) (people)	20	h
	05O Mental Health Services 570.201(e) (people)	0	L
	05P Screening for Lead-Based Paint/Lead Hazards Poison 570.201(e)	0	M
	05Q Subsistence Payments 570.204 (people)	200	H
	05R Homeownership Assistance (not direct) 570.204 (people)	0	M
	06 Interim Assistance 570.201(f)	15	H
	10 Removal of Architectural Barriers 570.201(k)	10	H
	11 Privately Owned Utilities 570.201(l)	0	L
	14A Single-family Rehabilitation 570.202	20	H
	14B Multi-family Rehabilitation 570.202	0	M
	14C Public Housing Modernization	NA	NA
	14D Rehabilitation of Other Public/Private Residential	0	L
	14E Rehabilitation of Commercial/Industrial	5	M
	14F Energy Efficiency Improvements	10	H
	14G Acquisition for Rehabilitation	0	L
	14H Rehabilitation Administration	NA	NA
	14I Lead Based Paint Test/Abatement	10	H
	14J Housing Services/ HOME Program	NA	NA
	15 Code Enforcement 570.202(c)	45	H
	16A Residential Historic Preservation 570.202	0	M
	16B Non-Residential Historic Preservation 570.202(d)	0	M
	17A CI Land Acquisition/Disposition 570.203(a)	0	L
	17B CI Infrastructure Development 570.203(a)	0	L
	17C CI Building Acquisition, Construction, Rehabilitation 570.203(a)	0	L
	17D Other Commercial/Industrial Improvements 570.203(a) (properties)	5	M
	18A ED Direct Financial Assistance to For-Profits 570.203(b) (properties)	2	M
	18B ED Technical Assistance 570.203(b) (properties)	5	M
	18C Micro-Enterprise Assistance (properties)	5	M
	19C CDBG Non-profit Organization Capacity Building	5	H
	19D CDBG Assistance to Institutes of Higher Education	0	L
	19E CDBG Operation and Repair of Foreclosed Property	0	L
	20 Planning 570.205	0	M
	21A General Program Administration 570.206	3	H
	21B Indirect Costs 570.206	0	M
	21D Fair Housing Activities (subject to 20% Admin cap) 570.206	5	H
	21E Submissions or Applications for Federal Programs 570.206	0	H
	22 Unprogrammed Funds	0	L
 	Acquisition of existing rental units	0	L

Production of new rental units	0	L
Rehabilitation of existing rental units	0	L
Rental assistance (multiple consecutive months)	10	H
Acquisition of existing owner units	0	L
Production of new owner units	0	L
Rehabilitation of existing owner units	20	H
Homeownership assistance	0	M

**2. Identify any obstacles to meeting underserved needs.**

The main obstacle to meeting underserved needs is money. This situation is especially true with the recession the country is facing at this time. Not only are needs increasing dramatically due to the stresses of the economic recession, but available funds from foundations and private donations are down considerably. Even in the best of economic times, the CDBG allocation plus the funds available from other Federal grants, foundations and private donations cannot begin to address all of the needs of League City residents.

A second obstacle to meeting underserved needs is the 15% cap for public services placed by legislation on HUD’s CDBG program. The City of League City sees a great need for and benefit from allocating a larger percentage of its CDBG funds to public service projects that can meet the needs of more low- to moderate-income residents throughout the City.

A third obstacle is the shortage of viable entities to provide some of the needed services. There are small non-profits with little or no capacity to address some of the most critical needs, such as those residents with mental illness, mental disabilities, physical disabilities or HIV/AIDS. Due to the low number of residents who have need for such specialized assistance, there is not the critical mass to warrant nearby comprehensive services. Therefore, most must go to Houston where a number of related services can be provided within a very small and accessible geographic area. As a result, many of those needing such services are forced to relocate to Houston to have access to programs. It becomes a two-edged sword – lack of sufficient numbers to warrant increased levels of service results in the potential clients that do live in League City having to relocate to accessible services, thus further lowering the local need.

Related to this conundrum of critical mass and accessible services is the issue of transportation. The City of League City has no public transit system making intra-city and inter-city transportation difficult or impossible for many. A new private non-profit transportation provider has begun serving League City residents on a demand-response basis. The City is working with this provider to increase its capacity to receive and manage federal funds and to develop an effective program to serve the elderly and disabled in League City.

**Lead-based Paint (91.215 (g))**

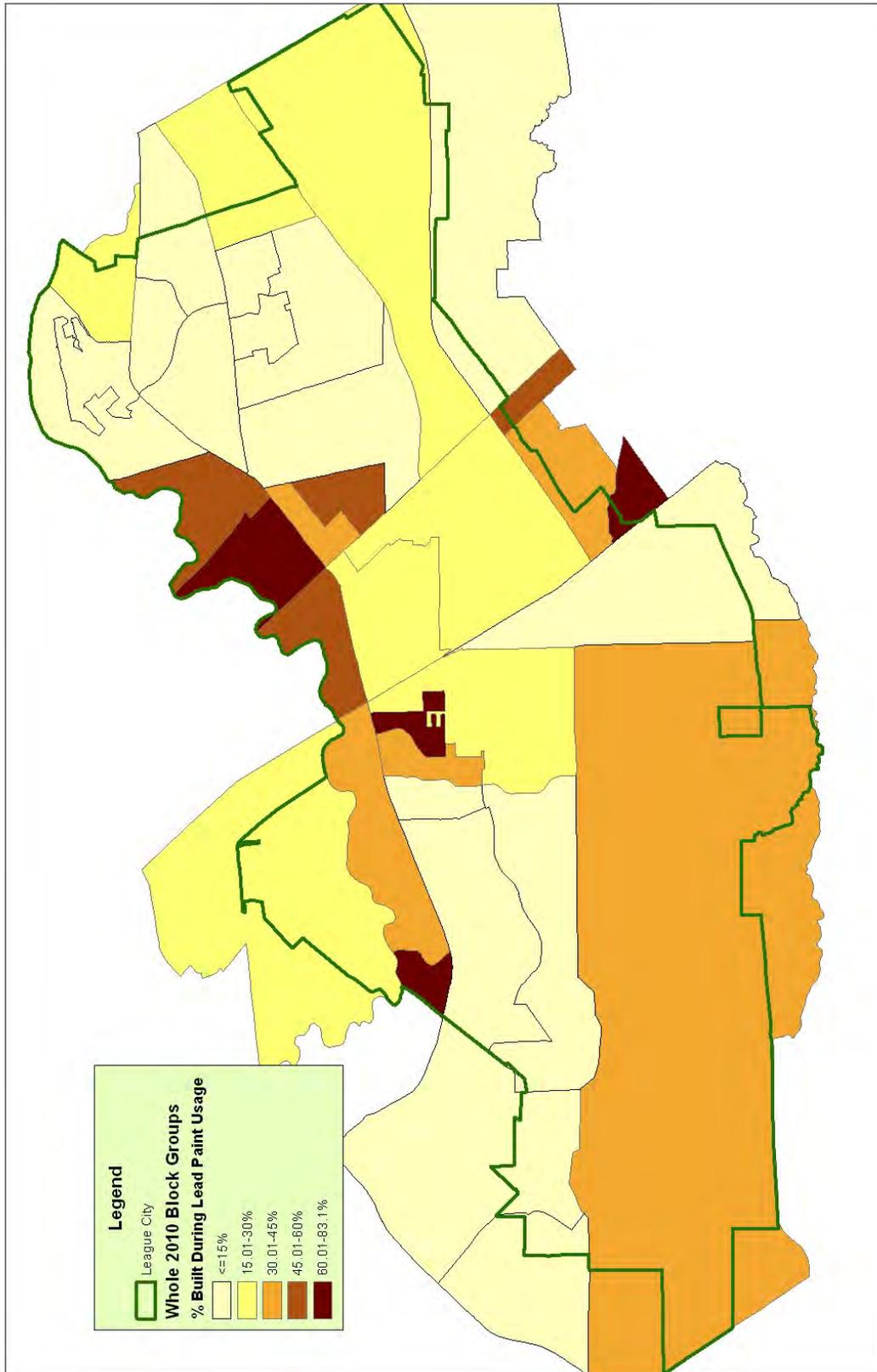
**1. Estimate the number of housing units that contain lead-based paint**

**hazards, as defined in section 1004 of the Residential Lead-Based Paint Hazard Reduction Act of 1992, and are occupied by extremely low-income, low-income, and moderate-income families.**

One of the issues with older housing stock is the problem of lead poisoning, particularly in children under the age of 6 years, due to the ingestion and/or inhaling of lead-based paint chips and dust. Lead-paint dust seeps into the walls and floors, into the soil and is breathed into the lungs. The more scraping and re-painting, the worse the problem. Until 1978, when it was outlawed, most homes used lead-based paint for the exterior siding and the interior framework. Lead poisoning occurs when people eat or breathe unsafe amounts of lead. Elevated blood lead levels can be very dangerous to children, resulting in reduced intelligence, behavioral problems, learning disabilities, and permanent brain damage.

HUD has derived a formula for estimating the number of housing units with lead-based paint: 90% of housing built before 1940 is likely to have lead-based paint and a poisoning danger; 80% of those built between 1940 and 1959 pose a danger; and 62% of those built between 1960 and 1979 pose a danger. Using these estimated rates from HUD, it can be assumed that 3,302 units in League City have lead-based paint and pose a hazard. This represents 10.6% of all housing in League City. The map below illustrates the location of housing built prior to lead-based paint being outlawed. Not every house built before 1979 has lead-based paint and not every instance of lead-based paint is on exposed surfaces or areas that can pose a health hazard. However, each renovation project should take into account the possibility of lead-based paint hazards and mitigate as required. All CDBG-funded rehabilitation projects do test for lead-based paint if the home was built prior to 1979.

Map 7 – Percent of Houses Built before Lead Paint Outlawed



It cannot be assumed that every case of elevated blood lead levels is due to exposure to lead-based paint, particularly lead-based paint in the child's home. However, lead poisoning cases can assist in measuring the magnitude of the problem. The Texas Department of Health's Environmental Epidemiology and Toxicology Division/Texas Child Lead Registry monitors lead poisoning cases. According to the Centers for Disease Control and Prevention, there is no low threshold for some adverse effects of lead in children and even blood lead levels (BLLs) as low as 10 micrograms/deciliter (ug/dL) have harmful effects. Children with venous blood lead levels of 20 ug/dL or above or with BLLs in the range of 15-19 ug/dL over a period of 3 months need a doctor's care.

The State of Texas Department State Health Services' Texas Childhood Lead Poisoning Prevention Program's Surveillance report indicates that in 2010 19.8% of Galveston County children under the age of 6 years were tested for elevated Blood Lead Levels (BLLs). Of those, 41 (0.9%) were found to have elevated BLLs. The number tested was considerably higher in 2010 than in 2006 (4,740 in 2010 versus 2,449 in 2006), while the number having elevated BLLs was considerably lower (41 in 2010 versus 60 in 2006). Due to the location of the older housing in Galveston County as well as the other exposure risks, it can be estimated that the vast majority of those 41 children lived in the City of Galveston or Texas City, not in League City.

**2. Outline actions proposed or being taken to evaluate and reduce lead-based paint hazards and describe how lead based paint hazards will be integrated into housing policies and programs, and how the plan for the reduction of lead-based hazards is related to the extent of lead poisoning and hazards.**

Any time the City of League City funds housing rehabilitation activities with federal funds, including CDBG funds, a lead-based paint test is required and mitigations for those homes testing positive are carried out as prescribed by federal regulations and as part of the rehabilitation process. Any demolition of buildings using federal funds also tests for and mitigates any evidence of lead-based paint or other lead-based issues.

## HOUSING

### Housing Needs (91.205)

\*Please also refer to the Housing Needs Table in the Needs.xls workbook

1. **Describe the estimated housing needs projected for the next three year period for the following categories of persons: extremely low-income, low-income, moderate-income, and middle-income families, renters and owners, elderly persons, persons with disabilities, including persons with HIV/AIDS and their families, single persons, large families, public housing residents, victims of domestic violence, families on the public housing and section 8 tenant-based waiting list, and discuss specific housing problems, including: cost-burden, severe cost- burden, substandard housing, and overcrowding (especially large families).**

Community Development Block Grant funds are restricted to low- and moderate-income areas and individuals and, in part, are aimed at reducing the degree of substandard housing and segregated communities, while expanding the number of units available to and affordable by very low-, low- and moderate-income residents. HUD defines these categories as follows:

- *Very low-income* households are those earning 30% or less of the area's median household income;
- *Low-income* households are those earning between 31 and 50% of the area's median household income; and
- *Moderate-income* households are those earning between 51 and 80% of the area's median.

The incomes in League City are higher than those for the rest of the area, therefore, the majority of League City residents have middle-incomes or greater. League City's median household income, as reported in the 2008-2010 American Community Survey of the U.S. Census Bureau, was \$86,268 compared to \$65,100 in 2010 for the Houston-Sugar Land-Baytown MSA, which includes Galveston County and League City. The table below details the HUD-eligible incomes for 2012 in League City.

**Table 6 – 2012 Household Incomes Eligible for CDBG Funding**

Household Size	Eligible Income		
	Very Low	Low	Moderate
1-Person	\$14,050	\$23,450	\$37,450
2-Person	\$16,050	\$26,800	\$42,800
3-Person	\$18,050	\$30,150	\$48,250
4-Person	\$20,050	\$33,450	\$53,500
5-Person	\$21,700	\$36,150	\$57,800
6-Person	\$23,300	\$38,850	\$62,200
7-Person	\$24,900	\$41,500	\$66,350
8-Person & Larger	\$26,500	\$44,200	\$70,650

The table below uses HUD's most recent Comprehensive Housing Affordability Strategy (CHAS) data from the 2005-2009 ACS to quantify the occupied housing units with housing problems. Housing problems in the CHAS are defined as one or more of the following: housing cost burden (30% or more of income spent on housing); overcrowding (more than 1 person per room); lacking some or all plumbing; and lacking some or all kitchen facilities.

**Table 7 – Summary of 2005-2009 CHAS Data**

	With Problems		With No Problems		Percent w/ Problems	
	Renter Occupied	Owner Occupied	Renter Occupied	Owner Occupied	Renter Occupied	Owner Occupied
Total Households	1,900	4,715	2,910	14,245	39.50%	24.87%
Very Low Income	470	620	20	20	95.92%	96.88%
White	285	475	20	0	93.44%	100.00%
African American	120	10	0	0	100.00%	100.00%
Asian	15	45	0	0	100.00%	100.00%
Hispanic	50	90	0	20	100.00%	81.82%
Low Income	600	590	110	160	84.51%	78.67%
White	355	480	25	105	93.42%	82.05%
African American	65	30	0	0	100.00%	100.00%
Asian	0	0	50	0	0.00%	0.00%
Hispanic	95	60	35	10	73.08%	85.71%
Moderate Income	435	850	250	340	63.50%	71.43%
White	265	585	145	250	64.63%	70.06%
African American	90	65	35	0	72.00%	100.00%
Asian	0	85	4	4	0.00%	95.51%
Hispanic	75	115	55	70	57.69%	62.16%
81-100% Median Income	315	620	435	600	42.00%	50.82%
White	205	485	265	480	43.62%	50.26%
African American	0	10	30	25	0.00%	28.57%
Asian	10	55	0	0	100.00%	100.00%
Hispanic	100	65	135	95	42.55%	40.63%
Above Median Income	75	2035	2095	13125	3.46%	13.42%
White	75	1345	1510	10345	4.73%	11.51%
African American	0	160	280	720	0.00%	18.18%
Asian	0	105	25	590	0.00%	15.11%
Hispanic	0	390	230	1270	0.00%	23.49%

As can be seen, 27.8% of all units, including 39.5% of rental units and 24.9% of owner-occupied units, have some level of housing problems. For the very low-income, more than 95% are living in housing with at least one problem. HUD has determined that a racial/ethnic imbalance occurs any time minorities have a rate of housing problems that is 10 percentage points or higher than whites. The occurrences of significantly higher rates of housing problems are denoted in the table

above with orange highlighting. In many cases the whites have a higher rate of housing problems than the minorities and in only moderate income and above do minorities have a significantly higher rate of housing problems.

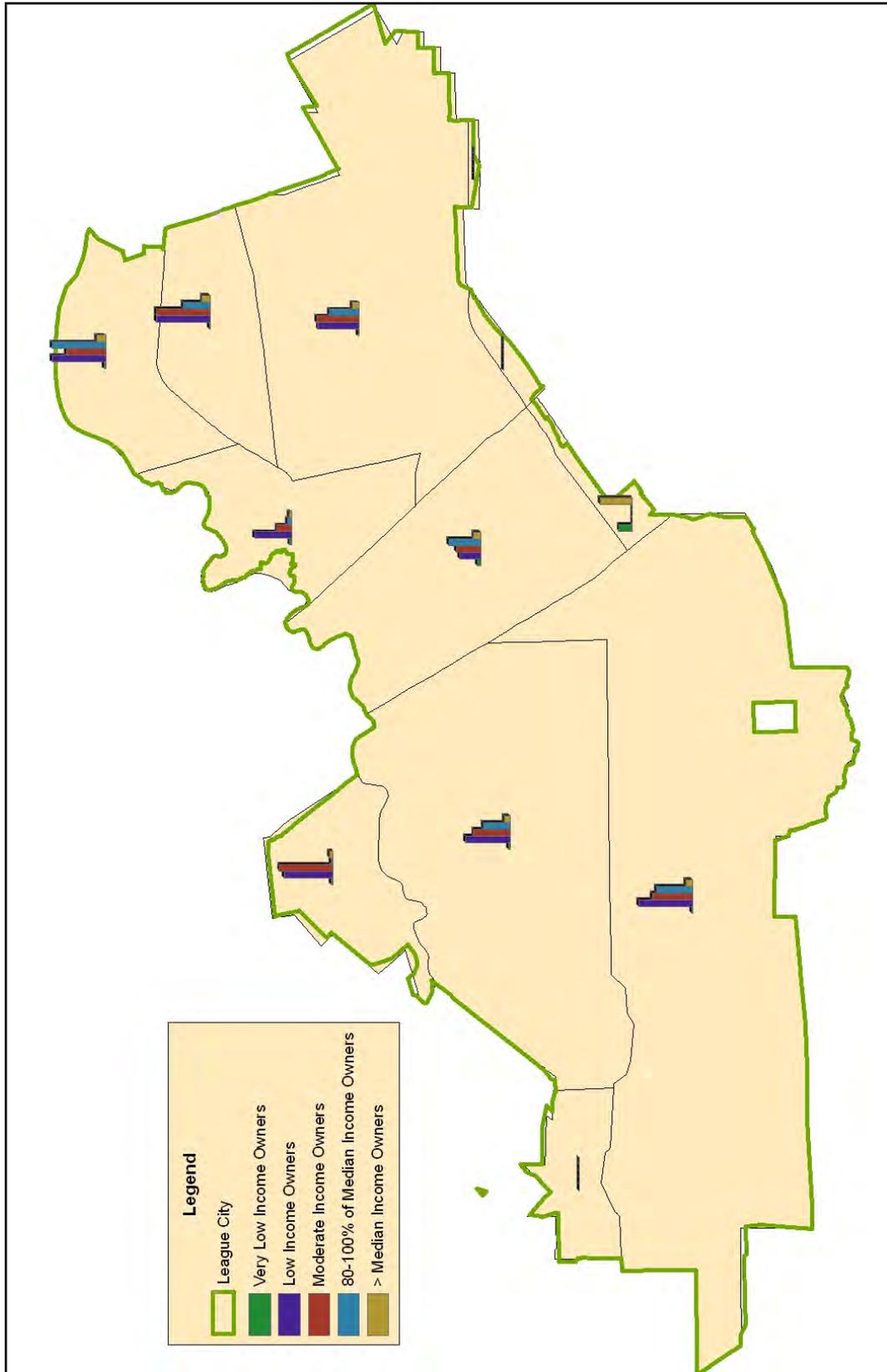
Below is a condensed version of the CHAS table provided in the Consolidated Plan Management Process (CPMP) Excel data files, **included in the attachments.**

**Table 6 – Compressed CHAS Data for All Households**

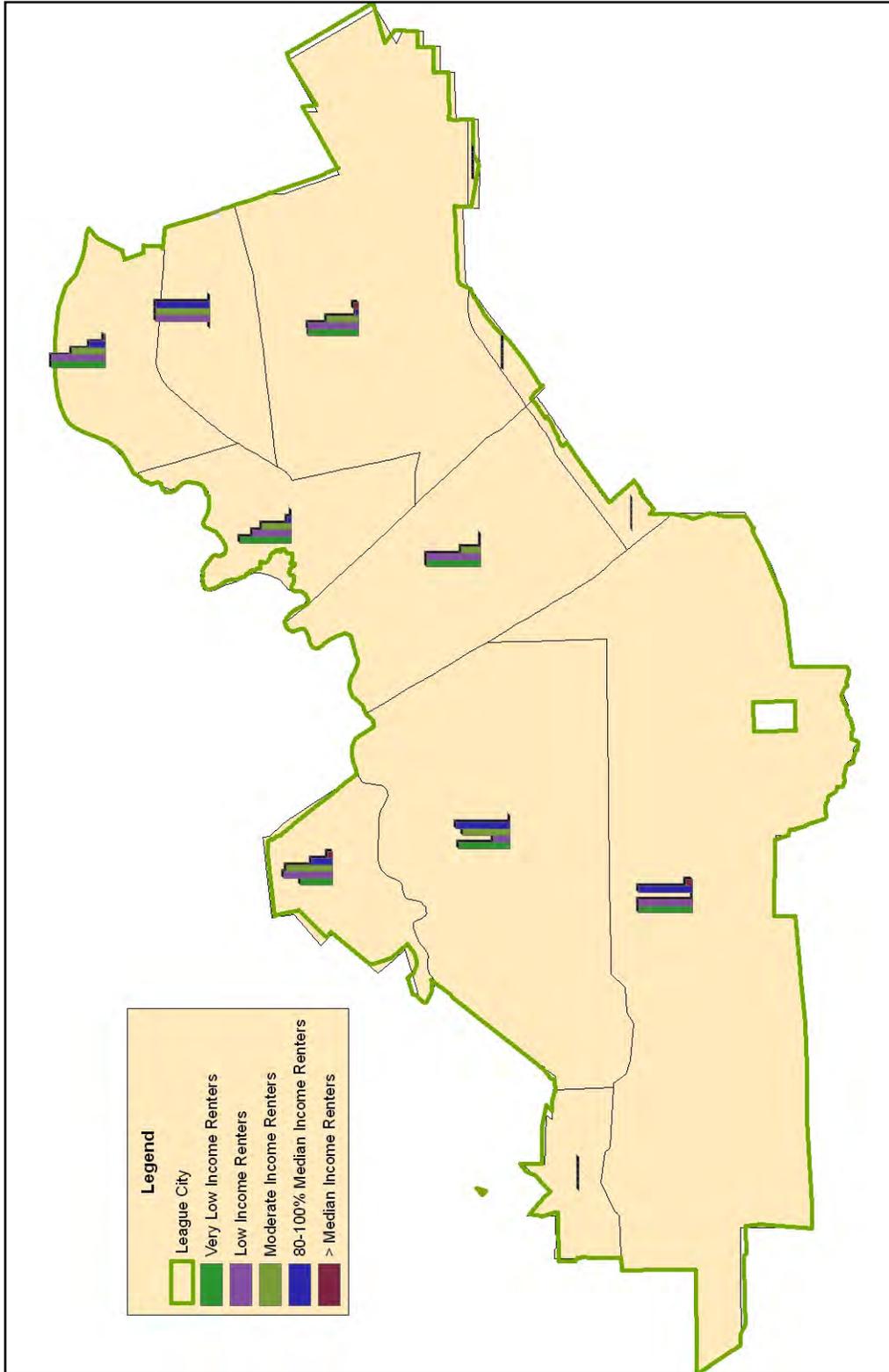
Household by Type, Income, & Housing Problem	Renters		Owners		Total Households
	Elderly	Non-Elderly	Elderly	Non-Elderly	
<b>Household Income &lt;=30% MFI</b>	80	420	150	520	1,170
Cost Burden 30%-50%	10	15	30	0	55
Cost Burden >50%	60	185	105	485	835
<b>Household Income &gt;30% to &lt;=50% MFI</b>	90	620	210	535	1,455
Cost Burden 30%-50%	10	360	40	120	530
Cost Burden >50%	55	155	75	380	665
<b>Household Income &gt;50 to &lt;=80% MFI</b>	775	565	370	820	2,530
Cost Burden 30%-50%	85	260	40	330	715
Cost Burden >50%	0	90	170	300	560
<b>Household Income &gt;80% MFI</b>	270	2,660	1,735	14,645	19,310
Cost Burden 30%-50%	25	200	120	2,000	2,345
Cost Burden >50%	15	0	45	385	445
<b>Total Households</b>	1,215	4,265	2,465	16,520	24,465
Cost Burden 30%-50%	130	835	230	2,450	3,645
Cost Burden >50%	130	430	395	1,550	2,505

As would be expected, the lower the income the greater the cost burden. However, certain areas of League City have a disproportion of higher incomes with a cost burden. The map below shows the combined owner and renter households with cost burdens by their incomes.

Map 8 – 2005-2009 Percent of Owners with Housing Cost Burden



Map 9 – 2005-2009 Percent of Renters with Housing Cost Burden



**Table 9 – 2000 Affordability Mismatch by Income and Cost**

<b>Housing Units by Affordability</b>	<b>Rented or For Rent</b>	<b>Owned or For Sale</b>
<b>1. Rent or Value Affordable for those with incomes &lt;= 30% of median</b>		
# occupied units	183	N/A
%occupants <=30%	9.8	N/A
%built before 1970	23.5	N/A
%some problem	9.8	N/A
#vacant for rent	18	N/A
<b>2. Rent or Value Affordable for those with incomes &gt;30% and &lt;=50% of median</b>		
# occupied units	396	3,124
%occupants <=50%	36.9	13.6
%built before 1970	37.1	27.7
% some problem	47.2	4.1
#vacant for rent or sale	112	59
<b>3. Rent or Value Affordable for those with incomes &gt;50% and &lt;=80% of median</b>		
# occupied units	2,057	4,899
%occupants <=80%	29.7	11.5
%built before 1970	12.3	10.4
%some problem	27.4	1.5
#vacant for rent or sale	240	103
<b>4. Rent or Value Affordable for those with incomes &gt;80% of median</b>		
# occupied units	994	4,383
#vacant for rent or sale	139	174

Of the 183 rental units that would be affordable to residents earning less than or equal to 30 percent of the median income, only 18 are occupied by those in this income category, leaving 252 households renting units that are not affordable, while 165 households with higher incomes are renting the remaining least expensive units. Data are not provided to determine how many of the occupants in the next price tier have incomes less than 30% of the median income. The table provided only shows the percent with incomes less than 50% of the median income for that category. However, only one-third of the renters and less than one-sixth of the owners of units affordable for those earning between 30 and 50% of the median income actually earn 50% of the median or less. This shows that two-thirds of the rental units and five-sixths of the owned units are occupied by higher income residents. The same holds for those units affordable to those earning between 50 and 80% of the area median income.

The ACS data do not allow for the creation of a comprehensive housing affordability table; however, the table below shows the number of occupied units by cost and the number of households that can afford each cost range. It is evident that approximately 464 of the very low-income renters are renting units affordable only to the low-income or higher. Likewise, a number of the moderate-income renters are renting units affordable to the low-income, potentially displacing the low-income renters. Those renters with incomes above moderate are displacing the moderate-income renters.

**Table 10 – 2005-2009 Estimated Housing Units and Households by Income**

<b>Housing Units by Affordability</b>	<b>Rented</b>	<b>Owned</b>
<b>1. Costs Affordable for those with incomes &lt;= 30% of median (&lt; \$500/month)</b>		
# occupied units	36	382
# households with incomes <=30% of median	500	670
<b>2. Costs Affordable for those with incomes &gt;30% and &lt;=50% of median (\$500-\$814/month)</b>		
# occupied units	1,469	1,051
# households with incomes > 30% and <= 50% of median	710	745
<b>3. Costs Affordable for those with incomes &gt;50% and &lt;=80% of median (\$815-\$1,300/month)</b>		
# occupied units	1,401	2,688
#households with incomes > 50% and <= 80% of median	1,340	1,190
<b>4. Costs Affordable for those with incomes &gt;80% of median (&gt; \$1,300/month)</b>		
# occupied units	2,574	14,864
# households with incomes > 80% of median	2,930	16,380

The data indicate that while most of League City residents are conservative in the housing choices and are living in houses that cost below the national definition of “affordable”, these renters and owners are supplanting those who can only afford low-cost housing. Therefore, the higher-income residents are able to have a greater choice in housing and have opted to rent or own more affordable homes. The lower-income residents have very limited choices and most of these choices are occupied by those higher-income residents, displacing the lower income residents.

Another issue that comes into play is that the lower the cost, the older the units. In 2000, more than 70% of the units affordable for those earning 50% or less of the area median income were built before 1970.

Neither the City of League City nor Galveston County have Public Housing Authorities that have public housing units or grant Section 8 Housing Choice Vouchers. Any resident that would qualify for Section 8 must apply through the State of Texas Department of Housing and Community Affairs. TDHCA has 1,540 vouchers for the entire “balance of State” not under local housing authorities. Currently, there are 897 on the waiting list for Section 8 HCVs, with a wait time of approximately 2 years. In 2010, 26 State Section 8 program participants were living in League City.

Currently, there are 3 Low-Income Housing Tax Credit properties in League City with a total of 490 units, 435 of which are available for low- to moderate-income households, including 80 specifically for the elderly and 21 for the disabled.

Interfaith Caring Ministries provides 1 month per year of rental assistance and/or utility assistance for low- to moderate-income households. No one in League City

received Homeless Prevention and Rapid Rehousing funds to provide rental assistance to those at risk of eviction.

According to the 2010 Texas HIV/STD Surveillance Report, there are 656 people in Galveston County living with HIV/AIDS. Assuming a geographic distribution equal to the total population, there are an estimated 155 people living with HIV/AIDS in League City. However, there are no supportive housing programs for the HIV/AIDS population within the City. As with other special populations who need additional services, the economies of scale, or critical mass, is not present in League City to support comprehensive services or specialized housing. Without access to the services, those needing specialized housing are likely to move to Houston where both housing and a comprehensive, multi-faceted set of supportive services are available and accessible. Taking into account the lack of accessible services, it can be estimated that many of League City's percentage share of HIV/AIDS population are actually living in Houston or Galveston. Therefore, a more accurate estimate of the number of people living with HIV/AIDS in League City is 75.

Bay Area Turning Point, the area's provider of counseling and shelter for victims of domestic violence, estimate that in any given year there are 175 individuals within approximately 65 families who seek shelter from domestic abuse. Bay Area Turning Point provides emergency shelter and a transitional housing program for its clients to provide tenant-based rental assistance (TBRA) for 3 to 12 months while the clients are in job training, educational programs or are working.

**2. To the extent that any racial or ethnic group has a disproportionately greater need for any income category in comparison to the needs of that category as a whole, the jurisdiction must complete an assessment of that specific need. For this purpose, disproportionately greater need exists when the percentage of persons in a category of need who are members of a particular racial or ethnic group is at least ten percentage points higher than the percentage of persons in the category as a whole.**

The table below, a repeat of an earlier summary of CHAS data, shows that there is very little disproportionately greater need for any racial or ethnic minority group. The highlighted cells in the table show those minority groups with housing problems more than 10 percentage points greater than their white counterparts. As would be expected, the lower the incomes, the greater the housing cost burden and those very low- and low-income households – renters and owners – of all racial/ethnic backgrounds have a much higher rate of housing cost burden than higher-income households.

**Table 11 – Low-Mod Income Households With Housing Problems\*  
Table 8 – Summary of 2005-2009 CHAS Data**

	With Problems		With No Problems		Percent w/ Problems	
	Renter Occupied	Owner Occupied	Renter Occupied	Owner Occupied	Renter Occupied	Owner Occupied
Total Households	1,900	4,715	2,910	14,245	39.50%	24.87%
Very Low Income	470	620	20	20	95.92%	96.88%
White	285	475	20	0	93.44%	100.00%
African American	120	10	0	0	100.00%	100.00%
Asian	15	45	0	0	100.00%	100.00%
Hispanic	50	90	0	20	100.00%	81.82%
Low Income	600	590	110	160	84.51%	78.67%
White	355	480	25	105	93.42%	82.05%
African American	65	30	0	0	100.00%	100.00%
Asian	0	0	50	0	0.00%	0.00%
Hispanic	95	60	35	10	73.08%	85.71%
Moderate Income	435	850	250	340	63.50%	71.43%
White	265	585	145	250	64.63%	70.06%
African American	90	65	35	0	72.00%	100.00%
Asian	0	85	4	4	0.00%	95.51%
Hispanic	75	115	55	70	57.69%	62.16%
81-100% Median Income	315	620	435	600	42.00%	50.82%
White	205	485	265	480	43.62%	50.26%
African American	0	10	30	25	0.00%	28.57%
Asian	10	55	0	0	100.00%	100.00%
Hispanic	100	65	135	95	42.55%	40.63%
Above Median Income	75	2035	2095	13125	3.46%	13.42%
White	75	1345	1510	10345	4.73%	11.51%
African American	0	160	280	720	0.00%	18.18%
Asian	0	105	25	590	0.00%	15.11%
Hispanic	0	390	230	1270	0.00%	23.49%

\* Housing problems include housing cost burden (housing costs  $\geq$  30% of income), overcrowding (more than 1 person per room), lacking some or all plumbing, and/or lacking some or all kitchen facilities. Overcrowding and cost burden comprise approximately 98% of all defined housing problems.

## **Priority Housing Needs (91.215 (b))**

- 1. Identify the priority housing needs and activities in accordance with the categories specified in the Housing Needs Table (formerly Table 2A). These categories correspond with special tabulations of U.S. census data provided by HUD for the preparation of the Consolidated Plan.**

League City's greatest need is for the rehabilitation of older housing, particularly housing owned by the elderly and/or disabled. An additional need is for more affordable housing for the low- to moderate-income residents, particularly the elderly and disabled. The City has a priority to provide minor housing rehabilitation to owner-occupied homes, particularly for the elderly and disabled homeowners.

According to the latest American Community Survey data, there are 1,782 occupied housing units built before 1970. The latest CHAS data show that 460 low- to moderate-income elderly homeowners have a housing cost burden, making general maintenance and housing repairs unaffordable. The majority of these houses owned by low- to moderate-income elderly were built before 1970, increasing the magnitude of need. The City of League City's Code Enforcement Division investigates the most dilapidated housing and demands that the owners of rental or vacant units bring the units up to City code. The City has a priority to provide "compassionate code enforcement" to low- to moderate-income residents who own the home in which they live. This form of code enforcement provides assistance in bringing owner-occupied properties and exteriors up to City code and providing exterior safety features for the disabled, such as wheelchair ramps and removing stumps, exposed tree roots and low-hanging branches.

The City of League City completed a housing rehabilitation program in the Shellside CDBG Target Area. This program has provided water and wastewater lines from the new public lines into the homes of low- to moderate-income resident owners and has provided for the safe abandonment of their wells and septic tanks. The project also provided energy efficiency improvements and minor rehabilitation to the housing structures.

The City is also beginning a structural rehabilitation program to provide minor housing rehabilitation and accessibility enhancements to houses owned and occupied by the elderly and disabled. The City of League City does not receive a level of CDBG funding to staff and manage an in-house housing rehabilitation program. Therefore, existing staff must take on the duties of the program until the City can identify a qualified non-profit agency to manage the program from receiving applications through qualifying applicants, contracting with firms to overseeing the work and closing out the project. As a result, the City will be able only to manage a few houses until a qualified agency can be contracted. At that time, more resources will be made available for housing rehabilitation.

Additionally, there is a need for 1,525 units of affordable rental housing to accommodate those households paying more than 30 percent of their income for rent. At this time, due to the limited funds to be received through CDBG, League City does not have a priority for assisting in the development of new affordable

housing. However, the City does entertain applications by developers for the development Low Income Housing Tax Credit projects and other subsidized units.

The table below summarizes the priority needs for housing activities in League City:

**Table 12 – Housing Priority Needs**

<b>HUD Code</b>	<b>Activity</b>	<b>Presumed Need ( estimates)</b>	<b>Priority (H, M, L)</b>
04	Demolition	400 units (2 properties)	M
05R/13	Homeownership Assistance	1,170 renters	M
05S	Rental Housing Subsidies	800 renters	H
05T	Security Deposits	750 households	M
12	Construction of Affordable Housing	1,050 owner occupied; 1,525 renter occupied	M
14A	Single Family Housing Rehabilitation	460 units	H
14B	Multi-family Housing Rehabilitation	976 units	L
14F	Energy Efficiency Improvements	3,500 units	H
14G	Acquisition for Rehabilitation	25 units	L
14I	Lead Based Paint Abatement	3,302 units	M
16A	Residential Historic Preservation	50 units	M

**2. Provide an analysis of how the characteristics of the housing market and the severity of housing problems and needs of each category of residents provided the basis for determining the relative priority of each priority housing need category.**

**Note: Family and income types may be grouped in the case of closely related categories of residents where the analysis would apply to more than one family or income type.**

The most severe housing problems facing League City were the homes in the Shellside Target Area without public water or sewer services. As a result, since PY 2004 when League City first became a CDBG Entitlement Jurisdiction, it has focused the majority of its annual CDBG funding to install public water and wastewater lines in the area and to provide private connections from the public lines to the homes of the low- to moderate-income homeowners in the area. A part of providing the new connections to the homes, the City has funded the safe abandonment of the obsolete wells and septic tanks and has paid the required Capital Recovery Fees for these residents.

Once the infrastructure work was completed, the City moved to the Main Street/Park Avenue Target Area and will upgrade existing infrastructure in that area. While housing rehabilitation will be carried out city-wide, a focus will be on this Main Street/Park Avenue area to maximize the impact of improvements to the area. This target area has the highest number of older homes as well as pockets of significant poverty and housing deterioration. Any owner-occupied low- to moderate-income homes that are in need of new connections to improved public infrastructure will be provided that connection through CDBG funding.

Houses owned and occupied by low- to moderate-income residents have a greater incidence of deferred maintenance leading to the need for minor rehabilitation. Providing the City can secure the quality services of a non-profit agency to conduct housing rehabilitation, the City will be providing minor rehabilitation to approximately 20 homes during the next 5 years.

Other housing needs fall outside the scope of funding available through CDBG and other existing resources. The City will continue to work with regional Community Housing Development Organizations (CHDOs) to encourage the use of State HOME and Housing Trust Fund money in League City.

**3. Describe the basis for assigning the priority given to each category of priority needs.**

Assigning the priority given to each category of priority needs is based on:

- Availability of CDBG and/or other housing funding;
- Availability of a non-profit or for-profit housing rehabilitation agency; and
- Availability of regional Community Housing Development Organizations (CHDOs) using State of Texas HOME or Housing Trust Fund money to provide new affordable housing, first-time homebuyers assistance and housing rehabilitation within League City.

Currently, the City is not in a position to carry out the development of new affordable housing or a comprehensive rehabilitation program. However, the City has given a high priority to housing rehabilitation in the event that a qualified agency is identified to manage the program. The City has given a medium priority to other housing activities in the anticipation that regional organizations using non-CDBG funds would be willing to carry out the activities and approach the City for a letter of consistency with this Consolidated Plan.

#### **4. Identify any obstacles to meeting underserved needs.**

The greatest obstacle to the City meeting the underserved housing needs is money. The City is not a HOME Participating Jurisdiction (PJ), so does not receive HOME funds. Additionally, the level of CDBG funding is such that comprehensive housing rehabilitation is not feasible and no level of housing construction is feasible.

Another obstacle to meeting the underserved needs is the lack of a qualified agency to manage a housing rehabilitation program. Without the financial resources to establish a division within the City, League City must contract with an outside entity to carry out significant housing rehabilitation activities. The City is currently seeking an agency with a proven track record in managing a CDBG-funded housing rehabilitation program.

A third obstacle is encouraging eligible households to apply for CDBG programs and to be willing to give information on income and residency. This obstacle is diminishing as the program ages and more residents are seeing the benefit.

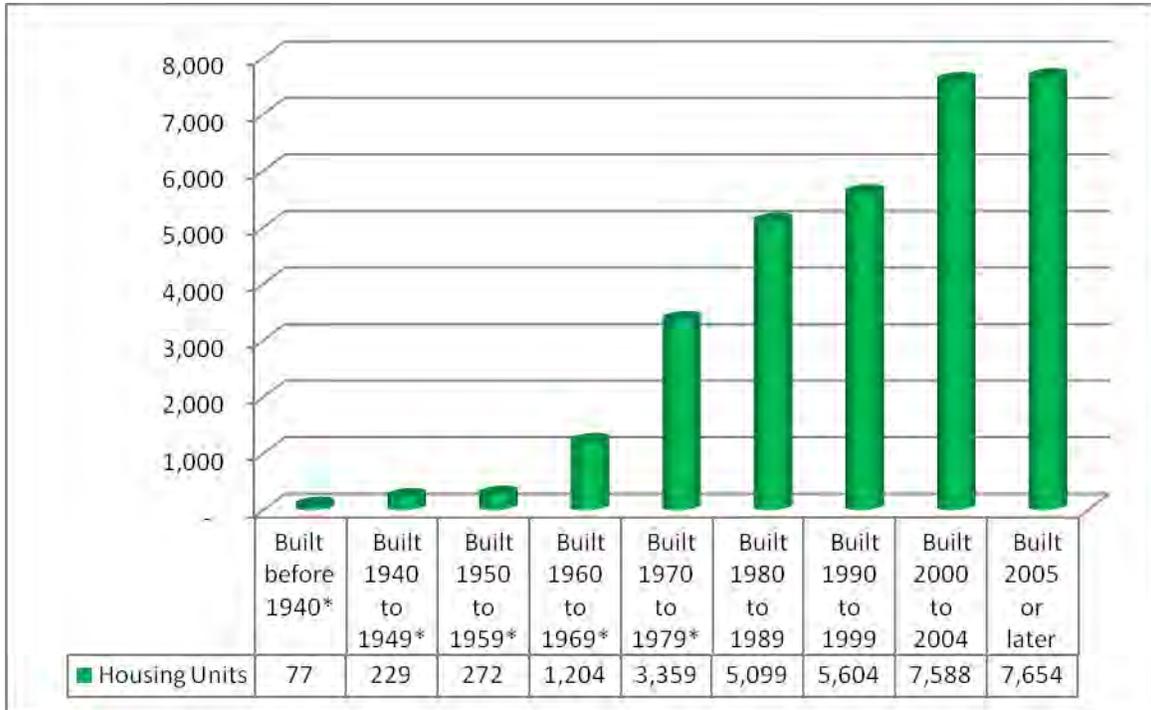
### **Housing Market Analysis (91.210)**

\*Please also refer to the Housing Market Analysis Table in the Needs.xls workbook

- 1. Based on information available to the jurisdiction, describe the significant characteristics of the housing market in terms of supply, demand, condition, and the cost of housing; the housing stock available to serve persons with disabilities; and to serve persons with HIV/AIDS and their families. Data on the housing market should include, to the extent information is available, an estimate of the number of vacant or abandoned buildings and whether units in these buildings are suitable for rehabilitation.**

The housing in League City is relatively new and there have been significant increases since 2000. The figure below shows the number of housing units by age.

**Figure 1 – Housing Units by Year Built (American Community Survey)**

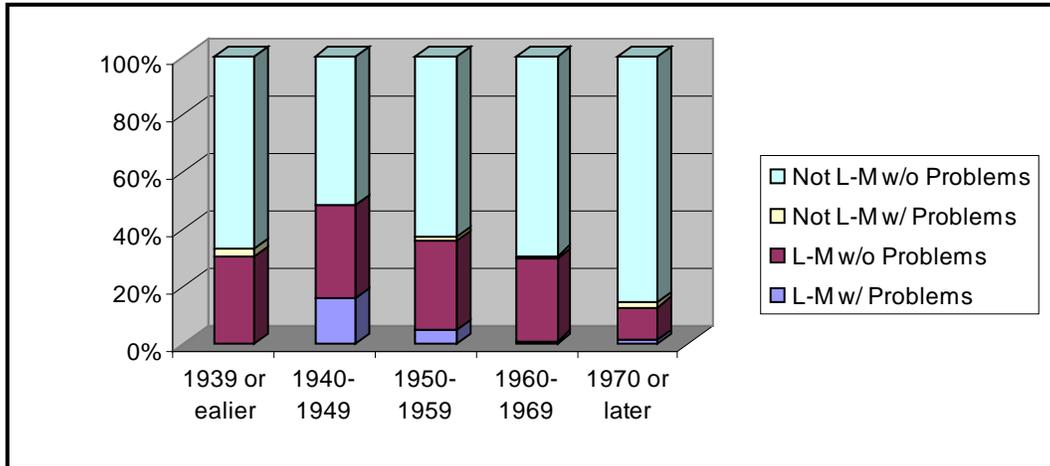


\* Lead-based Paint a possible hazard

There are relatively few units in League City with housing problems not related to cost burden. These problems are defined in the CHAS by HUD as being those with overcrowding (more than 1 person per room) or lacking complete kitchen or plumbing facilities. As can be seen from the figure below, the majority of the housing is housing with no problems occupied by those residents not low- to moderate-income. The older housing has a disproportionate rate of low- to moderate-income residents and units with housing problems, as can be seen from the table to the right. Nearly half of the units built between 1940 and 1949 are occupied by low- to moderate-income residents and nearly half of those have housing problems.

Year Built	% Low-Mod
1939 or earlier	30.28%
1940-1949	48.05%
1950-1959	36.05%
1960-1969	29.65%
1970 or later	12.74%

**Figure 2 – Age of Housing by Low-Mod Income and Housing Problems**



Source: 2005-2009 CHAS detailed tables;

L-M = Low-mod income; Problems = overcrowding or structural

The City of League City had only 22.6% renter-occupied units according to the 2008-2010 city-wide American Community Survey. Based on the CHAS data, 43.4% of the households earning 50 percent or less of the median income were renters, while only 8.2% of those earning more than 80% of the median income were renters. This fact is typical of most cities, as fewer low- to moderate-income residents can afford to purchase a home. The dilemma for lower income households in suburban cities is that the cost of rental housing often poses a burden. This is exacerbated by the lack of public housing or Section 8 Housing Choice Voucher programs in the suburban cities like League City.

HUD’s CHAS and Affordability Mismatch tables can be used to indicate a shortage in affordable rental units for the very low- and low-income renters. The table below shows the number of renters by income, the number of available affordable units renting below 30% of household income and the number actually occupied by those within the rent’s affordable income range. It is assumed that the shortfall is absorbed by the units affordable to the next higher income range. For example, those earning less than 30% of the area’s median income had a shortage of 236 affordable housing units, and it has been assumed that they have absorbed 236 of the units affordable to those earning 30-50% of the area’s median income.

**Table 14 – 2005-2009 Estimated Housing Units and Households by Income**

Housing Units by Affordability	Rented	Owned
<b>1. Costs Affordable for those with incomes &lt;= 30% of median (&lt; \$500/month)</b>		
# occupied units	36	382
# households with incomes <=30% of median	500	670
<b>2. Costs Affordable for those with incomes &gt;30% and &lt;=50% of median (\$500-\$814/month)</b>		
# occupied units	1,469	1,051
# households with incomes > 30% and <= 50% of median	710	745
<b>3. Costs Affordable for those with incomes &gt;50% and &lt;=80% of median (\$815-\$1,300/month)</b>		
# occupied units	1,401	2,688
#households with incomes > 50% and <= 80% of median	1,340	1,190
<b>4. Costs Affordable for those with incomes &gt;80% of median (&gt; \$1,300/month)</b>		
# occupied units	2,574	14,864
# households with incomes > 80% of median	2,930	16,380

The data indicate that while most of League City residents are conservative in the housing choices and are living in houses that cost below the national definition of “affordable”, these renters and owners are supplanting those who can only afford low-cost housing. Therefore, the higher-income residents are able to have a greater choice in housing and have opted to rent or own more affordable homes. The lower-income residents have very limited choices and most of these choices are occupied by those higher-income residents, displacing the lower income residents.

In 2012, the area’s median household income is \$66,900. Based on household size, a low- to moderate-income individual or 2-person household can afford rent of approximately \$900, assuming utility bills averaging \$100 per month for a one-bedroom apartment. A family of three or more would require a 2- or 3-bedrooms and affordable rents for low- to moderate-income would be \$1,137, assuming utility bills averaging \$200 per month for a 2- or 3-bedroom apartment. The table below shows the ranges of rents in League City by number of bedrooms. Only 2 apartment complexes with 2-bedroom units and no 3-bedroom units are affordable to the low- to moderate-income.

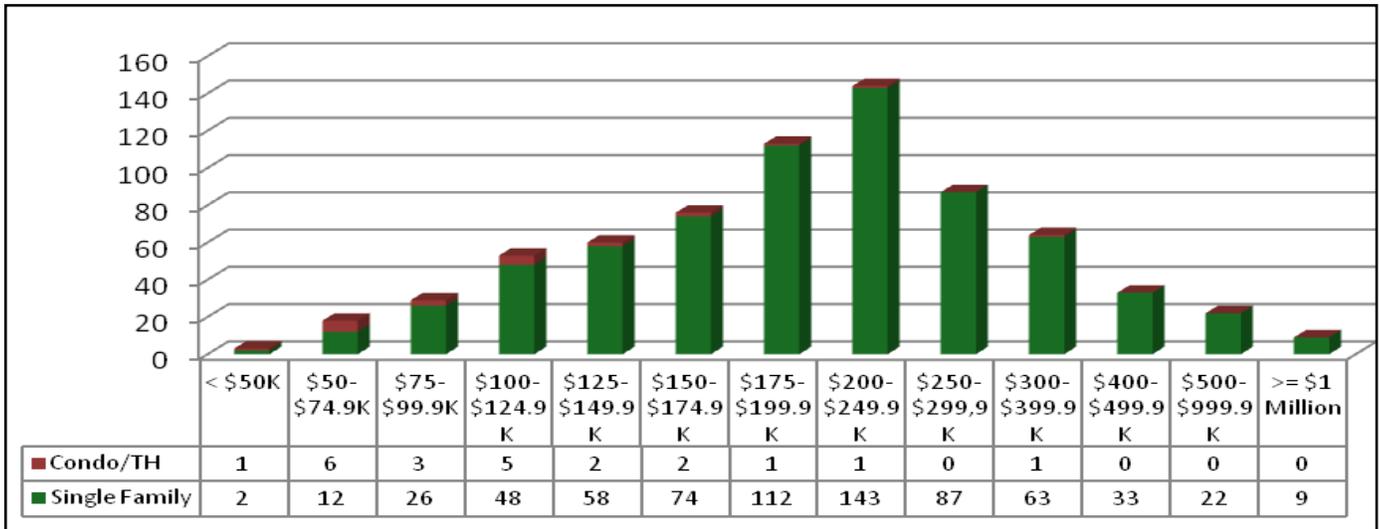
**Table 15 – 2012 Apartment Rents by Number of Bedrooms**

Number of Bedrooms	Lowest Rent	Highest Rent
0	N/A	N/A
1	\$575	\$2,318
2	\$785	\$3,590
3	\$1,149	\$8,952

Source: ForRent.com – February, 2012

Based on current interest rates, a family of four with good credit should be able to afford a home approximately twice their annual income without the monthly costs creating a burden. Therefore, low- to moderate-income families would be able to afford homes in the range of \$40,100 for very low-income to \$107,000 for moderate income families. The figure below shows the housing available for sale in February 2012. Only 45 of the single family units for sale would be affordable for a low- to moderate-income family of four.

**Figure 3 – Available Housing for Sale February 2012**



HAR = Houston Association of Realtors, Single Family Homes, Condos & Townhomes;

**Map of for sale here**

The Federal Financial Institutions Examination Council produces a Home Mortgage Disclosure Act data file every 2 years. This file lists every mortgage loan application by census tract, applicant demographics, census tract demographics, loan amount and outcome (loan accepted or denied by reason of denial). These data allow League City to determine if there is any apparent redlining or discrimination in accepting loan applications. It also shows a trend in the mortgage amount to income ratio. In analyzing the 8,008 mortgage loan applications for League City residential properties, including purchase, home improvements and refinancing, it does not appear that there is an undue burden placed on any racial/ethnic group or for anyone applying within a given census tract.

The table below shows the 2010 home loan applications by race/ethnicity and the rate of acceptance or primary denial reason. African Americans had the lowest rate of acceptance for a mortgage, with a significantly higher rate of denial for credit history than other race/ethnic groups. Less than 5% in any race/ethnic group had insufficient down payment cash as a primary reason for denial. However, each race/ethnic group had a 3-times higher rate of denial for insufficient downpayment than the applicants in 2008.

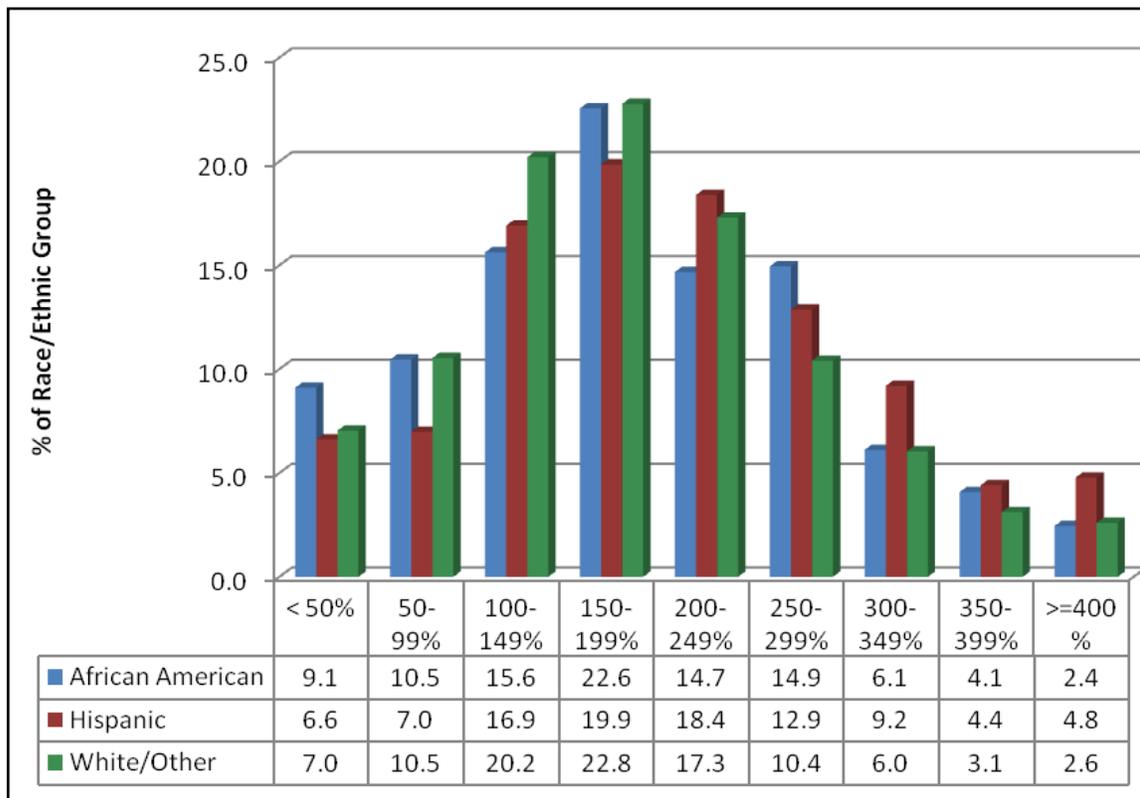
**Table 16 – Rate of Acceptance or Denial of Mortgage Loans by Race/Ethnicity**

	Applications	Application Accepted	Primary Reason for Loan Denial		
			Debt to Income Ratio	Credit History	Other
African American	292	237	18	16	21
Hispanic	779	665	33	39	42
Anglo & Other	6,937	6,228	157	158	394
Total	8,008	7,130	208	213	457

Source: Federal Financial Institutions Examination Council, Home Mortgage Disclosure Act Raw Data 2010

There are some significant differences by race/ethnicity of the ratio between the loan amount on the application and the applicant’s income. The figure below compares the primary race/ethnicity categories for home purchases only. Home improvement and refinance loans have been excluded from this analysis. As can be seen, Asians and non-Hispanic Anglos have a much higher percentage of loans totaling less than their income, while African Americans had a much higher percent of loan applications totaling more than twice their annual income.

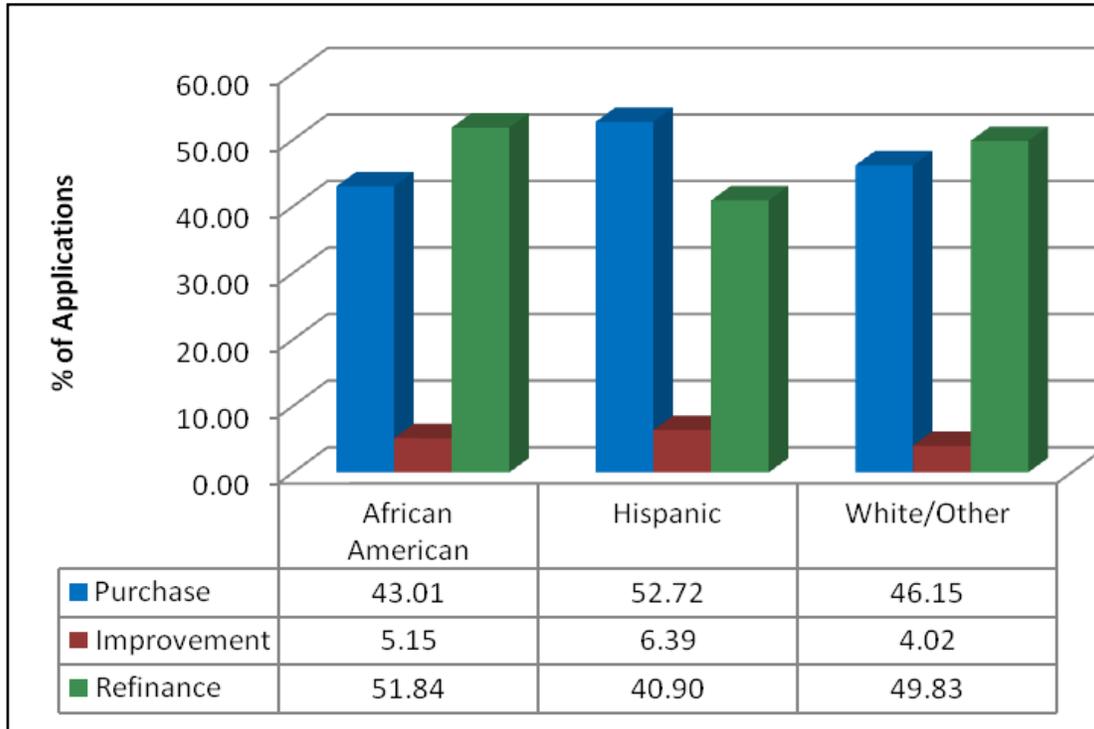
**Figure 4 – Ratio of Loan Application Amount\* to Income by Race/Ethnicity**



\* All Loan Applications for which financial information provided whether accepted or denied  
 Source: Federal Financial Institutions Examination Council, Home Mortgage Disclosure Act Raw Data 2010

As with loan-to-income ratios, the distribution of loan applications by purpose of the loan varies by race/ethnicity. The figure below shows the differences. Asians had a much lower rate than other groups of applying for home improvement or re-finance loans, while African Americans had a much higher rate than other groups of applying for re-financing. Hispanics and non-Hispanic Anglos had a somewhat higher rate than Asians or African Americans of applying for home improvement loans.

**Figure 5 – Purpose of Loan by Race/Ethnicity**



Source: Federal Financial Institutions Examination Council, Home Mortgage Disclosure Act Raw Data 2010

In summary, the vast majority of the homes for sale in League City are not affordable to low- to moderate-income residents. The lowest rents available are affordable to low-moderate income residents; however, as with the housing for sale, there are not many units in the lower price range. The City of League City does not receive HOME funds, therefore cannot support Community Housing Development Organizations (CHDOs) that can build affordable housing and/or provide first-time homebuyers assistance and education. During the next 5 years of this Consolidated Plan, the City will work with regional and state CHDOs to encourage their use of State HOME and Housing Trust Fund dollars to assist low- to moderate-income residents in accessing affordable housing. Additionally, the City will support valid applications for Low Income Housing Tax Credit properties.

Using the Affordability table in the CPMP “Needs” spreadsheet, it appears that over \$5 million is needed to bring all housing units up to standard in League City. The table in CPMP is provided below. The Fair Market Rents (FMRs) are from 2012 HUD data for Galveston County. The housing data are from the 2008-2010 city-wide American Community Survey. The Affordable Rents are computed using the 2012 Low-income (50% of median) from the HUD Eligible Incomes by household size.

Rehabilitation needs have been computed using total estimated substandard housing multiplied by \$5,000 per bedroom.

**Table 17 – HUD Housing Market Analysis Table from CPMP “Needs”**

Housing Stock Inventory	Vacancy Rate	0 & 1 Bedroom	2 Bedrooms	3+ Bedrooms	Total	Substandard Units
<b>Affordability Mismatch</b>						
Occupied Units: Renter		1,812	1,864	1,142	4,818	72
Occupied Units: Owner		63	1,102	17,824	18,989	285
Vacant Units: For Rent	8.3%	150	154	95	399	24
Vacant Units: For Sale	2.9%	2	32	517	551	28
Total Units Occupied & Vacant		2,027	3,152	19,578	24,757	409
<b>Rents: Applicable FMRs (in \$s)</b>		\$738	\$937	\$1,409		
<b>Rent Affordable at 30% of 50% of MFI (in \$s)</b>		\$670	\$836	\$971		
<b>Public Housing Units</b>						
Occupied Units		NA	NA	NA	NA	NA
Vacant Units		NA	NA	NA	NA	NA
Total Units Occupied & Vacant		NA	NA	NA	NA	NA
<b>Rehabilitation Needs (in \$s)</b>		\$10,000	\$20,000	\$2,000,000	\$2,030,000	

**2. Describe the number and targeting (income level and type of household served) of units currently assisted by local, state, or federally funded programs, and an assessment of whether any such units are expected to be lost from the assisted housing inventory for any reason, (i.e. expiration of Section 8 contracts).**

Currently there are 3 low-income housing tax credit (LIHTC) properties in League City comprising 490 total units, of which 435 are low-income units, with 21 for the disabled.

Neither the City nor Galveston County has a housing authority for the Section 8 Housing Choice Voucher program. Therefore, there are no other government-funded programs within the city limits. None of the current LIHTC units are expected to be lost from the inventory.

The City of League City anticipates providing minor rehabilitation to 20 owner-occupied units during the next 5 years. Currently, the City is seeking qualified non-profit entities to carry out the housing rehabilitation and will provide technical assistance to the selected group. As a result, the housing rehabilitation activities may not begin during the next 1 to 2 years.

**3. Indicate how the characteristics of the housing market will influence the use of funds made available for rental assistance, production of new units, rehabilitation of old units, or acquisition of existing units. Please note, the goal of affordable housing is not met by beds in nursing homes.**

The City of League City is not a HOME or ESG Participating Jurisdiction. Therefore, there are no funds available for rental assistance, production of new units or the acquisition of existing units by the City or its CDBG subrecipients. The City does provide minor rehabilitation of owner-occupied housing through CDBG. During the next 5 years, it is anticipated that the housing rehabilitation program will be expanded and enhanced as the City identifies and secures a qualified non-profit to carry out the rehabilitation activities. It is estimated that at least 20 owner-occupied units will receive minor rehabilitation and energy efficiency improvements.

**Specific Housing Objectives (91.215 (b))**

**1. Describe the priorities and specific objectives the jurisdiction hopes to achieve over a specified time period.**

During the next five years, the City intends to focus much of its infrastructure and housing activities in the Main Street/Park Avenue Target Area. During the past 8 years, the focus was on the Shellside area which now has water and wastewater lines as well as connections and energy efficiency measures installed in the eligible homes. In addition, the City hopes to include minor structural rehabilitation for low-moderate income homeowners throughout the City. The table below has been extracted and condensed from the "HSG Needs" worksheet in the CPMP "Needs" spreadsheet. It details the objectives for housing rehabilitation during the next 5 years.

**Table 18 – Housing Rehabilitation Objectives  
(based on 2005-2009 CHAS data)**

		Households w/ Problems	Year 1	Year 2	Year 3	Year 4	Year 5	Priority Need	Plan to Fund
Very Low Income			Goal	Goal	Goal	Goal	Goal		
Renters	Elderly	70						L	N
	Small Fam	200						L	N
	Large Fam	40						L	N
	Other	165						L	N
Owners	Elderly	150		3	3	3	3	H	Y
	Small Fam	200						M	N
	Large Fam	125						M	N
	Other*	140		2	2	2	2	H	Y
Low Income									
Renters	Elderly	65						L	N
	Small Fam	240						L	N
	Large Fam	50						L	N
	Other	235						L	N
Owners	Elderly	115		3	3	3	3	H	Y
	Small Fam	195						M	N
	Large Fam	130						M	N
	Other*	145		2	2	2	2	M	N
Moderate Income									
Renters	Elderly	95						L	N
	Small Fam	215						L	N
	Large Fam	0						L	N
	Other	135						L	N
Owners	Elderly	210		3	3	3	3	H	Y
	Small Fam	305						H	Y
	Large Fam	110						M	N
	Other*	225		2	2	2	2	M	Y

\* Non-elderly disabled will be the focus of rehabilitation objectives for this category

**2. Describe how Federal, State, and local public and private sector resources that are reasonably expected to be available will be used to address identified needs for the period covered by the strategic plan.**

The City’s current funding includes only CDBG funds. There is no public housing authority or Section 8 program within League City. However, the City intends to identify a qualified State CHDO and encourage the agency to work with the City in providing first-time homebuyers assistance and affordable housing construction. At this time the City has been unable to identify a qualified CHDO or encourage a non-profit to become a State CHDO and work within League City.

### **Needs of Public Housing (91.210 (b))**

In cooperation with the public housing agency or agencies located within its boundaries, describe the needs of public housing, including the number of public housing units in the jurisdiction, the physical condition of such units, the restoration and revitalization needs of public housing projects within the jurisdiction, and other factors, including the number of families on public housing and tenant-based waiting lists and results from the Section 504 needs assessment of public housing projects located within its boundaries (i.e. assessment of needs of tenants and applicants on waiting list for accessible units as required by 24 CFR 8.25). The public housing agency and jurisdiction can use the optional Priority Public Housing Needs Table (formerly Table 4) of the Consolidated Plan to identify priority public housing needs to assist in this process.

There is no public housing authority or agency providing Section 8 Housing Choice Vouchers or other tenant-based assistance in League City or in other mainland areas of Galveston County. Therefore, this section is not applicable.

### **Public Housing Strategy (91.210)**

1. Describe the public housing agency's strategy to serve the needs of extremely low-income, low-income, and moderate-income families residing in the jurisdiction served by the public housing agency (including families on the public housing and section 8 tenant-based waiting list), the public housing agency's strategy for addressing the revitalization and restoration needs of public housing projects within the jurisdiction and improving the management and operation of such public housing, and the public housing agency's strategy for improving the living environment of extremely low-income, low-income, and moderate families residing in public housing.

Not Applicable as no public housing agency exists to serve League City.

2. Describe the manner in which the plan of the jurisdiction will help address the needs of public housing and activities it will undertake to encourage public housing residents to become more involved in management and participate in homeownership. (NAHA Sec. 105 (b)(11) and (91.215 (k))

Not Applicable as no public housing agency exists to serve League City.

3. If the public housing agency is designated as "troubled" by HUD or otherwise is performing poorly, the jurisdiction shall describe the manner in which it will provide financial or other assistance in improving its operations to remove such designation. (NAHA Sec. 105 (g))

Not Applicable as no public housing agency exists to serve League City.

**Barriers to Affordable Housing (91.210 (e) and 91.215 (f))**

- 1. Explain whether the cost of housing or the incentives to develop, maintain, or improve affordable housing are affected by public policies, particularly those of the local jurisdiction. Such policies include tax policy affecting land and other property, land use controls, zoning ordinances, building codes, fees and charges, growth limits, and policies that affect the return on residential investment.**

Housing cost is a barrier to affordable housing in League City. The income level of the household directly influences the rental or purchase of any housing unit. In the City of League City, 30.3% of the population has incomes at or below 80% of the area median income.

HUD defines Cost Burden as paying more than 30% of adjusted monthly income for housing with households paying more than 50% of adjusted monthly income as Severely Cost Burdened. The table below is the CHAS table from 2005-2009 data provided by HUD. It shows the cost burdens for owners and renters by income and household type. The table below indicates that many residents of the City experience a housing cost burden.

**Table 19 – Cost Burden by Income Level (based on 2005-2009 CHAS data)**

			Current % of Households	Current Number of Households	Priority Need?	Plan to Fund?	Fund Source	
Household Income <=30% MFI	Renter	Elderly	NUMBER OF HOUSEHOLDS		80			
			<a href="#">Any housing problems</a>	87.5	70	H	N	
			<a href="#">Cost Burden &gt; 30%</a>	12.5	10	H	N	
			Cost Burden >50%	75.0	60	H	N	
		Small Related	NUMBER OF HOUSEHOLDS		210			
			With Any Housing Problems	95.2	200	L	N	
			Cost Burden > 30%	7.1	15	L	N	
			Cost Burden >50%	50.0	105	L	N	
		Large Related	NUMBER OF HOUSEHOLDS		40			
			With Any Housing Problems	100.0	40	M	N	
	Cost Burden > 30%		0.0	0	M	N		
	Cost Burden >50%		100.0	40	M	N		
	All other households	NUMBER OF HOUSEHOLDS		170				
		With Any Housing Problems	97.1	165	H	N		
		Cost Burden > 30%	97.1	165	H	N		
		Cost Burden >50%	0.0	0	H	N		
	Owner	Elderly	NUMBER OF HOUSEHOLDS		150			
			With Any Housing Problems	100.0	150	H	Y	CDBG
			Cost Burden > 30%	20.0	30	H	N	
			Cost Burden >50%	80.0	120	H	N	
Small Related		NUMBER OF HOUSEHOLDS		240				
		With Any Housing Problems	83.3	200	M	N		
		Cost Burden > 30%	0.0	0	M	N		
		Cost Burden >50%	83.3	200	M	N		
Large Related		NUMBER OF HOUSEHOLDS		125				
		With Any Housing Problems	100.0	125	M	N		
	Cost Burden > 30%	0.0	0	M	N			

MFI Household Income > 30 to <=50%		All other households	Cost Burden >50%	100.0	125	M	N	
			NUMBER OF HOUSEHOLDS		155			
			With Any Housing Problems	90.3	140	M	Y*	CDBG
			Cost Burden > 30%	0.0	0	M	N	
			Cost Burden >50%	90.3	140	M	N	
	Renter	Elderly	NUMBER OF HOUSEHOLDS		90			
			With Any Housing Problems	72.2	65	H	N	
			Cost Burden > 30%	22.2	20	H	N	
			Cost Burden >50%	11.1	10	H	N	
		Small Related	NUMBER OF HOUSEHOLDS		295			
			With Any Housing Problems	81.4	240	L	N	
			Cost Burden > 30%	52.5	155	L	N	
			Cost Burden >50%	25.4	75	L	N	
		Large Related	NUMBER OF HOUSEHOLDS		75			
			With Any Housing Problems	66.7	50	M	N	
			Cost Burden > 30%	66.7	50	M	N	
			Cost Burden >50%	0.0	0	M	N	
		All other households	NUMBER OF HOUSEHOLDS		250			
			With Any Housing Problems	94.0	235	H	N	
			Cost Burden > 30%	62.0	155	H	N	
Cost Burden >50%	32.0		80	H	N			
Owner	Elderly	NUMBER OF HOUSEHOLDS		210				
		With Any Housing Problems	54.8	115	H	Y	CDBG	
		Cost Burden > 30%	19.0	40	H	N		
		Cost Burden >50%	35.7	75	H	N		
	Small Related	NUMBER OF HOUSEHOLDS		240				
		With Any Housing Problems	81.3	195	M	N		
		Cost Burden > 30%	22.9	55	M	N		
		Cost Burden >50%	58.3	140	M	N		
	Related	NUMBER OF HOUSEHOLDS		130				

Household Income > 50 to <= 80% MFI	All other households	With Any Housing Problems	100.0	130	M	N		
		Cost Burden > 30%	34.6	45	M	N		
		Cost Burden >50%	65.4	85	M	N		
		NUMBER OF HOUSEHOLDS		165				
		With Any Housing Problems	87.9	145	M	Y*	CDBG	
		Cost Burden > 30%	12.1	20	M	N		
		Cost Burden >50%	75.8	125	M	N		
	Renter	Elderly	NUMBER OF HOUSEHOLDS		120			
			With Any Housing Problems	79.2	95	H	N	
			Cost Burden > 30%	20.8	25	H	N	
			Cost Burden >50%	0.0	0	H	N	
		Small Related	NUMBER OF HOUSEHOLDS		285			
			With Any Housing Problems	75.5	215	L	N	
			Cost Burden > 30%	43.9	125	L	N	
			Cost Burden >50%	31.6	90	L	N	
Large Related		NUMBER OF HOUSEHOLDS		10				
		With Any Housing Problems	0.0	0	M	N		
		Cost Burden > 30%	0.0	0	M	N		
		Cost Burden >50%	0.0	0	M	N		
All other households		NUMBER OF HOUSEHOLDS		270				
		With Any Housing Problems	50.0	135	M	N		
		Cost Burden > 30%	50.0	135	M	N		
		Cost Burden >50%	0.0	0	M	N		
Owner	Elderly	NUMBER OF HOUSEHOLDS		370				
		With Any Housing Problems	56.8	210	H	Y	CDBG	
		Cost Burden > 30%	10.8	40	H	N		
		Cost Burden >50%	45.9	170	H	N		
	Small Related	NUMBER OF HOUSEHOLDS		420				
		With Any Housing Problems	72.6	305	M	N		
		Cost Burden > 30%	27.4	115	M	N		

		Cost Burden >50%	45.2	190	M	N	
	Large Related	NUMBER OF HOUSEHOLDS		145			
		With Any Housing Problems	75.9	110	M	N	
		Cost Burden > 30%	41.4	60	M	N	
		Cost Burden >50%	27.6	40	M	N	
	All other households	NUMBER OF HOUSEHOLDS		255			
		With Any Housing Problems	88.2	225	M	Y*	CDBG
		Cost Burden > 30%	60.8	155	M	N	
		Cost Burden >50%	27.5	70	M	N	

The National Low Income Housing Coalition (*Out of Reach 2012*) provides the following information on renters in the League City/Galveston County area. According to the report, in Texas, the Fair Market Rent (FMR) for a two-bedroom apartment is \$937. In order to afford this level of rent and utilities, without paying more than 30% of income on housing, a household must earn \$18.02 hourly or \$37,480 annually. Currently, rents of only \$502 are affordable to those very low-income households.

In Texas, a minimum wage worker earns an hourly wage of \$7.25. In order to afford the FMR for a 2-bedroom apartment, a minimum wage earner must work 100 hours per week, 52 weeks per year. Or, a household must include 2.5 Full-Time Equivalent (FTE) minimum-wage earner(s) in order to make the 2-bedroom FMR affordable.

In the Houston Metropolitan Area, including League City, the estimated mean (average) wage for a renter is \$18.30 an hour with rents of \$939 being affordable. Monthly Supplemental Security Income (SSI) payments for an individual are \$696 in Texas. If SSI represents an individual's sole source of income, \$209 in monthly rent is affordable, while the FMR for a 1-bedroom is \$772.

No local policies negatively affect housing costs.

**Zoning:** The City of League City's Zoning Regulations and other land use policies do not appear to be a barrier to affordable housing. Requirements for minimum street frontage, setbacks, density requirements, or off-site improvements do not impose impediments to new housing development. The City maintains a Planning and Zoning Commission to approve subdivision plats and make recommendations regarding development in League City. The Zoning Board of Adjustment meets to rule on applications for variances to the zoning plan for League City. The Development Review Committee meets weekly with developers, reviews development plans and offers assistance with the feasibility of projects. Deed Restrictions are enforced by the subdivisions' Homeowners Associations, not by the City.

**Building Codes:** The City of League City has adopted the latest available editions of the following building codes:

- 2006 International Residential Code (ICC)
- 2006 International Building Code
- 2006 International Plumbing Code
- 2006 International Gas Code
- 2006 International Fire Prevention Code
- 2006 International Mechanical Code
- 2005 National Electrical Code (NEC)
- Codes Modified by City Ordinances
- Chapter 27 of the City Code of Ordinances contains several modifications to the Standard Codes and National Electrical Code, none of which place an undue burden or added expense on the developer or rehabilitation contractor

These codes set minimum standards for construction in the City. A review of the codes indicates that they do not hinder the development of affordable housing but rather enforce acceptable building standards of affordable housing units. All housing and building codes are consistent with the Department of Housing and Urban Development Fair Housing regulations.

**Floodplain Development Requirements:** In January 2012, the City revised the permitting process regarding development within the floodplain. League City adheres to the National Flood Insurance Program regulations and standards in order to provide subsidized flood insurance to the property owners. In addition, the City had placed a higher standard on the elevation of new construction and substantially improved structures in order to safeguard properties from future flood damage. These new and substantially improved buildings must be built at a minimum of 18" above the base flood elevation.

**Tax Issues:** At this time, the City does not offer tax incentives to encourage the development of affordable housing. However, the City's tax rate is considerably lower than other municipalities in the Metropolitan Area. The City does provide tax deferment for elderly homeowners.

**Code Enforcement:** The City recognizes that the enforcement of property codes is essential to the maintenance of quality housing stock. The City proposes to utilize CDBG funds to enhance its code enforcement for residential properties, particularly for the compassionate code enforcement program to assist in the removal of dangerous elements on properties owned and occupied by low-moderate income elderly or disabled residents.

**4B Corporation:** The 4B Corporation uses sales tax revenues for amateur recreational facilities.

**Economic Development Corporation:** The EDC is responsible for preparing and developing an Economic Development Plan in accordance with policies or directives established by the City Council. The Plan includes guidelines on the use of funds received, which may include municipal facilities, parks, museums, stadiums, parking facilities and other facilities both private and public.

- 2. Describe the strategy to remove or ameliorate negative effects of public policies that serve as barriers to affordable housing, except that, if a State requires a unit of general local government to submit a regulatory barrier assessment that is substantially equivalent to the information required under this part, as determined by HUD, the unit of general local government may submit that assessment to HUD and it shall be considered to have complied with this requirement.**

There do not appear to be any negative effects of public policies that serve as barriers to affordable housing. The new floodplain regulations do result in higher development costs for houses located in the floodplain; however, these higher costs are the price paid for safeguarding properties and protecting homes from future damage.

## HOMELESS

### Homeless Needs (91.205 (b) and 91.215 (c))

\*Please also refer to the Homeless Needs Table in the Needs.xls workbook

**Homeless Needs— The jurisdiction must provide a concise summary of the nature and extent of homelessness in the jurisdiction, (including rural homelessness and chronic homelessness where applicable), addressing separately the need for facilities and services for homeless persons and homeless families with children, both sheltered and unsheltered, and homeless subpopulations, in accordance with Table 1A. The summary must include the characteristics and needs of low-income individuals and children, (especially extremely low-income) who are currently housed but are at imminent risk of either residing in shelters or becoming unsheltered. In addition, to the extent information is available, the plan must include a description of the nature and extent of homelessness by racial and ethnic group. A quantitative analysis is not required. If a jurisdiction provides estimates of the at-risk population(s), it should also include a description of the operational definition of the at-risk group and the methodology used to generate the estimates.**

The City of League City falls under the umbrella of the Gulf Coast Coalition for the Homeless. While the Coalition uses the City's Pro Rata share of Continuum of Care funding, it does not include League City in any of its special tabulations or programs. No agency accessible to League City residents receives Continuum of Care funding. Bay Area Turning Point does provide shelter and supportive services to League City residents who are victims of domestic violence or sexual assault, but there are no shelters or transitional housing programs for the general homeless population, including the chronically homeless. In 2011, the Gulf Coast Coalition opted to become part of the "Balance of State" application for the continuum of care. As a result, data are now aggregated at the state level.

The table below shows the 2010 estimated number of homeless in League City and the number of beds available to League City residents. Note that none of the shelter beds are located in League City, but are at Bay Area Turning Point that serves League City. The estimated number of homeless has been based upon the 2010 enumeration of homeless in Galveston County apportioned by League City's population share of the County. An expanded version of this table is provided in the CPMP "Needs" spreadsheet on the "Homeless" worksheet.

**Table 20 – Homeless Inventory**

Part 1: Homeless Population	Sheltered		Un-sheltered	Total
	Emergency	Transitional		
1. Homeless Individuals	2	0	40	42
2. Homeless Families with Children	2	0	0	2
2a. Persons in Homeless with Children Families	6	0	0	6
Total (lines 1 + 2a)	8	0	40	48
Part 2: Homeless Subpopulations	Sheltered		Un-sheltered	Total
1. Chronically Homeless	0		7	7
2. Severely Mentally Ill	0		0	0
3. Chronic Substance Abuse	0		0	0
4. Veterans	0		0	0
5. Persons with HIV/AIDS	0		0	0
6. Victims of Domestic Violence	0		0	0
7. Youth (Under 18 years of age)	0		0	0

**Priority Homeless Needs**

- Using the results of the Continuum of Care planning process, identify the jurisdiction's homeless and homeless prevention priorities specified in Table 1A, the Homeless and Special Needs Populations Chart. The description of the jurisdiction's choice of priority needs and allocation priorities must be based on reliable data meeting HUD standards and should reflect the required consultation with homeless assistance providers, homeless persons, and other concerned citizens regarding the needs of homeless families with children and individuals. The jurisdiction must provide an analysis of how the needs of each category of residents provided the basis for determining the relative priority of each priority homeless need category. A separate brief narrative should be directed to addressing gaps in services and housing for the sheltered and unsheltered chronic homeless.

The City of League City has attempted to be apprised of the information developed by the Gulf Coast Homeless Coalition as well as to be included in the planning and implementation of the Coalition's funding and activities. The Coalition has been resistant to inclusion of League City staff or consultants and has not funded any programs that serve League City, nor has it requested a letter of Consistency with the Consolidated Plan for its Continuum of Care applications. There are no general population shelters, transitional housing programs or permanent housing for the homeless in League City. Bay Area Turning point does provide shelter to homeless women and their children, but only those who are victims of domestic violence or sexual assault. In 2011, the Gulf Coast Homeless Coalition opted to become part of the "Balance of State" application for Texas. The State of Texas did not request a letter of consistency from League City for the PY 2011 Continuum of Care

application.

The priority given each need category has been based on (1) actual level of need and (2) availability of programs to meet the need. As a result, League City has given a Medium priority to shelters and to transitional housing for families and a Low priority to other categories. The City has funded Bay Area Turning Point in the past and anticipates that in future years it may resume such funding. The City will encourage other agencies providing shelter and/or transitional housing to serve League City's homeless and to access CDBG funding. Also taken from the CPMP "Needs" table, the table below shows the units expected to be funded and the priority given to each category.

**Table 21 – Priorities and Goals for Serving Homeless**

Part 3: Homeless Needs Table: Individuals		Needs	Currently Available	Gap	Quantities			Total	Priority H, M, L	Plan to Fund? Y <sup>N</sup>
					Year 1	Year 2	Year 3			
					Goal	Goal	Goal	Goal		
Beds	Emergency Shelters	42	2	40	0	5	5	10	M	Y
	Transitional Housing	32	0	32	0	0	0	0	M	N
	Permanent Supportive Housing	7	0	7	0	0	0	0	L	N
	Total	81	2	79	0	5	5	10	M	
Chronically Homeless		0	0						L	N
<b>Part 4: Homeless Needs Table: Families</b>										
Beds	Emergency Shelters	6	2	4	0	5	5	10	M	Y
	Transitional Housing	6	0	6	0	0	0	0	M	N
	Permanent Supportive Housing	3	0	3	0	0	0	0	L	N
	Total	15	2	13	0	5	5	10	M	

**2. A community should give a high priority to chronically homeless persons, where the jurisdiction identifies sheltered and unsheltered chronic homeless persons in its Homeless Needs Table - Homeless Populations and Subpopulations.**

Based on the information from the 2010 enumeration of the homeless conducted by the Gulf Coast Homeless Coalition, there does not appear to be any chronically homeless in League City. Therefore, the homeless populations have not received a High priority based on the chronic homeless population.

### **Homeless Inventory (91.210 (c))**

**The jurisdiction shall provide a concise summary of the existing facilities and services (including a brief inventory) that assist homeless persons and families with children and subpopulations identified in Table 1A. These include outreach and assessment, emergency shelters and services, transitional housing, permanent supportive housing, access to permanent housing, and activities to prevent low-income individuals and families with children (especially extremely low-income) from becoming homeless. The jurisdiction can use the optional Continuum of Care Housing Activity Chart and Service Activity Chart to meet this requirement.**

There are no homeless facilities and services in League City. Bay Area Turning Point is the only facility and service provider serving League City residents and it serves only victims of domestic violence or sexual assault.

Interfaith Caring Ministries provides services to prevent homelessness and the City of League City funds its efforts through CDBG. Interfaith Caring Ministries, located in and serving League City, provides emergency utility assistance to residents to prevent disconnection leading to homelessness. In addition, beginning in PY 2008, Interfaith Caring Ministries is under contract with the City to provide compassionate code enforcement to elderly and disabled homeowners in an attempt to allow the owners to remain independent and in their homes.

### **Homeless Strategic Plan (91.215 (c))**

- 1. Homelessness— Describe the jurisdiction's strategy for developing a system to address homelessness and the priority needs of homeless persons and families (including the subpopulations identified in the needs section). The jurisdiction's strategy must consider the housing and supportive services needed in each stage of the process which includes preventing homelessness, outreach/assessment, emergency shelters and services, transitional housing, and helping homeless persons (especially any persons that are chronically homeless) make the transition to permanent housing and independent living. The jurisdiction must also describe its strategy for helping extremely low- and low-income individuals and families who are at imminent risk of becoming homeless.**

The City of League City falls under the umbrella of the Gulf Coast Homeless Coalition. Without sufficient local agencies to serve the homeless, the City is not able to establish a local homeless coalition to apply for its Pro Rata share of Continuum of Care funding. As of 2011, the Gulf Coast Homeless Coalition has relegated its combined pro rata share to the State of Texas and the area now falls under the "Balance of State" for the Continuum of Care application and process. In addition, the City does not receive Emergency Solutions Grant funds to support the development and implementation of homeless programs and shelters.

The City will continue to support efforts for the prevention of homelessness by providing funding for emergency assistance. Currently, the only agency providing emergency assistance provides only utility assistance, but the City will fund

rental/mortgage assistance if Interfaith Caring Ministries or another agency is able to provide such a service.

No other entities are located within accessible proximity to League City to provide homeless prevention, shelter, transitional housing, supportive services or permanent housing to the general homeless population. In the event that capable organizations are established to serve League City, the City will make every effort to provide CDBG funding to support the program.

**2. Chronic homelessness—Describe the jurisdiction’s strategy for eliminating chronic homelessness by 2012. This should include the strategy for helping homeless persons make the transition to permanent housing and independent living. This strategy should, to the maximum extent feasible, be coordinated with the strategy presented Exhibit 1 of the Continuum of Care (CoC) application and any other strategy or plan to eliminate chronic homelessness. Also describe, in a narrative, relationships and efforts to coordinate the Conplan, CoC, and any other strategy or plan to address chronic homelessness.**

Estimates based on the Gulf Coast Homeless Coalition’s enumeration indicate that the City of League City has no chronic homelessness. In addition, there are no facilities to provide services to this population. Without a critical mass to make permanent housing affordable and without neighboring support services for those needing permanent housing, no agency is able to provide such services in or immediately adjacent to League City.

**3. Homelessness Prevention—Describe the jurisdiction’s strategy to help prevent homelessness for individuals and families with children who are at imminent risk of becoming homeless.**

The City will continue to fund Interfaith Caring Ministries (ICM) in its mission to provide emergency utility and rental assistance to residents. The City will assist Interfaith Caring Ministries in application to the State of Texas for Emergency Solutions Grant funds and any other elements of the new HEARTH Act that are expansions of the Homeless Prevention and Rapid Rehousing program.

**4. Institutional Structure—Briefly describe the institutional structure, including private industry, non-profit organizations, and public institutions, through which the jurisdiction will carry out its homelessness strategy.**

At this time, the Gulf Coast Homeless Coalition, while including League City’s Pro Rata share in its applications for Continuum of Care funding, does not involve the City or any local agencies in its planning or implementation. Repeated attempts by the City to be included have met with resistance and the Coalition has excluded League City from participation. In 2011, the Coalition opted to become part of the Texas “Balance of State” process for the Continuum of Care further separating League City from any involvement in the coordination of homeless services.

The City has a history of funding Interfaith Caring Ministries that provides homeless prevention services through its emergency assistance and food bank. In addition, the City has funded Bay Area Turning Point, located outside of League City but providing shelter and supportive services to League City residents who are homeless victims of domestic violence.

In the event that any other agency serving the homeless becomes viable in or near League City, the City will accept application for funding and if the project is eligible and the agency has the capacity to carry out the activities, it will give priority to funding the program(s).

**5. Discharge Coordination Policy—Every jurisdiction receiving McKinney-Vento Homeless Assistance Act Emergency Shelter Grant (ESG), Supportive Housing, Shelter Plus Care, or Section 8 SRO Program funds must develop and implement a Discharge Coordination Policy, to the maximum extent practicable. Such a policy should include “policies and protocols for the discharge of persons from publicly funded institutions or systems of care (such as health care facilities, foster care or other youth facilities, or correction programs and institutions) in order to prevent such discharge from immediately resulting in homelessness for such persons.” The jurisdiction should describe its planned activities to implement a cohesive, community-wide Discharge Coordination Policy, and how the community will move toward such a policy.**

The City of League City does not receive Emergency Shelter Grant funds and no private agency in the city receives any McKinney-Vento Homeless Assistance Act funds for shelter, transitional or permanent housing. Therefore, there is no discharge coordination policy.

### **Emergency Shelter Grants (ESG)**

**(States only) Describe the process for awarding grants to State recipients, and a description of how the allocation will be made available to units of local government.**

Not Applicable

**COMMUNITY DEVELOPMENT**

**Community Development (91.215 (e))**

\*Please also refer to the Community Development Table in the Needs.xls workbook

1. Identify the jurisdiction's priority non-housing community development needs eligible for assistance by CDBG eligibility category specified in the Community Development Needs Table (formerly Table 2B), – i.e., public facilities, public improvements, public services and economic development.

The City of League City consulted with a number of local, state and federal data sources and agencies to determine the level of need for each of the non-housing community development categories. Below is the resulting table by HUD Matrix Code.

**Table 22 – Non-housing Community Development Needs**

HUD Code	Activity	Presumed Need (estimates)	Priority (H, M, L)
<b>Target Area-Based Activities (Low-Mod Income Area)</b>			
03	Public Facilities (General)	1 needed	M
03D	Youth Centers	1 needed	M
03F	Parks, Recreational Facilities	43 acres of mini- and neighborhood parks Improvements to 2 parks in target areas	H
03I	Flood Drainage	~12,500 feet in target areas	H
03J	Water/Sewer Improvements	~500 feet in target areas 1 lift station in target area	H
03K	Street Improvements (including street lighting)	~15,000 feet in target areas 8,500 new & retrofit street lights for energy efficiency	H
03L	Sidewalks	~25,500 linear feet in target areas	H
03O	Fire Stations/Equipment	1 upgrade	M
03P	Health Facilities	adequate	L
03R	Asbestos Removal	privately managed	L

	04	Clearance/Demolition	1 multi-family site; 10 commercial sites; 20 single family sites	M
	04A	Cleanup Contaminated Sites	5 sites	M
	05I	Crime Awareness	adequate	L
	14E	Commercial/Industrial Rehabilitation	20 sites	M
	15	Code Enforcement	2,500 lots	H
	16B	Non-residential Historic Preservation	20 sites	M
	18A	Economic Development Direct Assistance to For-Profits	20 establishments	M
	18B	Economic Development Technical Assistance	20 establishments	M
	18C	Micro-Enterprise Assistance	35 establishments	M
<b>Low-Mod Income Clients or Households (any area)</b>				
	03A	Senior Centers	adequate	L
	03B	Handicapped Centers	1 needed	M
	03C	Homeless Facilities	adequate	L
	03M	Child Care Centers	adequate	L
	03Q	Abused/Neglected Children Facilities	adequate	L
	05	General Public Services	1,500 low-mod income	M
	05A	Senior Services	1,250 seniors	H
	05B	Handicapped Services	1,500 disabled	M
	05C	Legal Services	500 low-mod income	L

05D	Youth Services	2,500 youth	H
05E	Transportation Services	750 elderly & disabled	H
05F	Substance Abuse Services	50 individuals	L
05G	Domestic Violence Services	120 families	H
05H	Employment Training	2,300 adults	M
05J	Fair Housing Activities	10 activities	H
05K	Tenant/Landlord Counseling	Adequate	L
05L	Child Care Services	600 children	L
05M	Health Services	9,850 adults; 2,700 children	M
05N	Abused/Neglected Children Services	240 children	M
05O	Mental Health Services	450 individuals	M
05T	Security Deposits	750 households	L
06	Interim Assistance	2,030 households	H
19C	Non-profit Capacity Building	10 agencies	M
19D	Assistance to Institutes of Higher Learning	adequate	L
19E	Operation and Repair of Foreclosed Properties	25 properties	L

**2. Describe the basis for assigning the priority given to each category of priority needs.**

The basis for assigning the priorities given for the eligible non-housing projects includes the following:

- Quantifiable need based on a variety of local, state and federal data sources;

- Funding availability, including consideration of the 15% cap on public services;
- Availability of capable agencies to carry out the activities;
- Results of the on-line public survey of needs (see table below);
- Results of public hearings, public comments and interviews with agencies and City staff; and
- Recommendations in the Comprehensive, Parks and Capital Improvement Plans.

**Table 23—Results of 2012 Public Needs Survey**

<b>Please rank the following owner-occupied housing needs in League City:</b>		<b>Please rank the following public facilities needs in League City:</b>	
Minor Rehabilitation	2.66	Multi-service/Recreational Facility	3.03
Major Rehabilitation	2.46	Public Neighborhood Parks	3.03
Demolition/Reconstruction	2.17	Senior Center	2.81
Construction of New Affordable Housing	2.32	Day Center for Disabled	2.42
Energy Efficiency Improvements	3.41	Child Care Center	2.46
Downpayment Assistance	2.27	Improved Flood Control/Drainage	3.34
Housing Counseling	2.81	Improved Water/Sanitary Sewer Lines	3.26
		Improved streets	3.05
		Improved Sidewalks/Street Lighting	3.55
		Historic preservation	2.89
<b>Please rank the following rental housing needs in League City:</b>		<b>Please rank the following social service needs in League City:</b>	
Minor Rehabilitation	2.73	Services for abused/neglected children	2.36
Moderate or Major Rehabilitation	2.47	Services for victims of domestic violence	2.25
Demolition/Reconstruction	2.52	Services and shelter for homeless	1.72
Assisted Facilities for Frail Elderly	2.77	Legal services	2.14
Assisted Facilities for Disabled	2.47	Child care	2.44
Apartments for Elderly	2.78	Youth services	2.74
Handicapped-Accessible Apartments	2.61	Senior services	2.83
Rental Units for Small Households	2.06	Handicapped services	2.53
Rental Units for Large Households	1.72	ESL/Literacy education/Adult education	2.14
		Mental health & substance abuse services	2.25
		Emergency, interim assistance	1.89
		Health services	2.53
		Transportation services	3.17
		Employment training/Job placement	2.47
		Economic or Micro-business programs	2.72
		Crime prevention/awareness	3.17

*Note: scores were from 1=very low need to 5= very high need*

### **3. Identify any obstacles to meeting underserved needs.**

The primary obstacle to meeting the underserved needs in League City is money. With the limited CDBG allocation and the 15% cap on public service expenditures, there is very limited funding available to address all of the service needs. With the limited annual allocation, additional funds are needed for infrastructure and facility improvements or expansions.

The secondary obstacle is the limited number of viable non-profit organizations to carry out the public service functions required to meet the needs of the underserved. There are very few non-profit agencies serving League City and the majority of them do not have the capacity to receive and administer federal, state or local public funds.

The third major obstacle is the economies of scale for agencies. While the needs in League City are great, they pale in comparison with those in the City of Houston and other large metropolitan cores. Therefore, the critical mass does not exist in League City to warrant the establishment of readily accessible supportive services and facilities.

### **4. Identify specific long-term and short-term community development objectives (including economic development activities that create jobs), developed in accordance with the statutory goals described in section 24 CFR 91.1 and the primary objective of the CDBG program to provide decent housing and a suitable living environment and expand economic opportunities, principally for low- and moderate-income persons.**

**NOTE: Each specific objective developed to address a priority need, must be identified by number and contain proposed accomplishments, the time period (i.e., one, two, three, or more years), and annual program year numeric goals the jurisdiction hopes to achieve in quantitative terms, or in other measurable terms as identified and defined by the jurisdiction.**

The primary objectives for non-housing community development revolve around the rehabilitation of deteriorating conditions in commercial areas and neighborhoods, providing services for those in need, providing transportation options to the low-income and providing anti-poverty economic development to neighborhoods and residents. The City is committed to repairing the infrastructure – streets, water lines, wastewater (sewer) lines, storm drainage, sidewalks and street lights – in older neighborhoods. The focus for the next 5 years will be the Main Street/Park Avenue neighborhood which will be receiving extensive improvements and enhancements through CDBG, Economic Development Corporation, the City General and Bond Funds and other public grant funds. In addition, the City has a priority of reducing crime in the neighborhoods and deterioration of privately-owned properties. The City will provide assistance in code enforcement activities and neighborhood clean-ups and will work with residents for neighborhood patrols and anti-crime activities. The City will assess transportation needs of the elderly and disabled and seek providers of transportation services. Other objectives include the improvement of existing parks and recreation facilities, community buildings and other public buildings within the CDBG Target Areas as well as the expansion of services to those low-moderate income populations in need.

The table below is a compressed version of the "Community Development" worksheet in the CPMP Needs spreadsheet. It details the anticipated services to be provided with CDBG funds during the next 5 years as well as the activities with a Medium or High priority that can be funded by other sources while still being consistent with this Consolidated Plan.

**Table 24 – Planned Objectives for Non-Housing Community Development**

Non-Housing Community Development Activities		5-Year Quantities					Total	Priority Need: H, M, L
		Year 1	Year 2	Year 3	Year 4	Year 5		
		Goal	Goal	Goal	Goal	Goal		
01 Acquisition of Real Property 570.201(a)		0	0	0	0	0	0	L
02 Disposition 570.201(b)		0	0	0	0	0	0	L
Public Facilities Improvements	03 Public Facilities and Improvements (General) 570.201(c)	0	0	0	0	0	0	M
	03A Senior Centers 570.201(c)	0	0	0	0	0	0	M
	03B Handicapped Centers 570.201(c)	0	0	0	0	0	0	M
	03C Homeless Facilities (not operating costs) 570.201(c)	0	0	0	0	0	0	L
	03D Youth Centers 570.201(c)	0	0	0	0	0	0	M
	03E Neighborhood Facilities 570.201(c)	0	0	0	0	0	0	M
	03F Parks, Recreational Facilities 570.201© (Improvements)	1	0	1	0	0	2	H
	03G Parking Facilities 570.201©	0	1	0	0	0	0	M
	03H Solid Waste Disposal Improvements 570.201(c)	0	0	0	0	0	0	L
	03I Flood Drain Improvements 570.201(c) (Projects)	0	1	0	0	0	1	H
	03J Water/Sewer Improvements 570.201(c) (Feet)	0	200	200	200	200	800	H
	03K Street Improvements 570.201(c) (Feet)	0	500	0	500	0	1,000	H
	03L Sidewalks 570.201(c) (Feet)	0	750	250	250	250	500	H
	03M Child Care Centers 570.201(c)	0	0	0			0	L
	03N Tree Planting 570.201(c)	0	0	0			0	M
	03O Fire Stations/Equipment 570.201(c)	0	0	0			0	M
	03P Health Facilities 570.201(c)	0	0	0			0	L
	03Q Abused and Neglected Children Facilities 570.201(c)	0	0	0			0	L
03R Asbestos Removal 570.201(c)	0	0	0			0	L	
03S Facilities for AIDS Patients (not operating costs) 570.201(c)	0	0	0			0	L	
03T Operating Costs of Homeless/AIDS Patients Programs	0	0	0			0	L	
04 Clearance and Demolition 570.201(d)		0	0	1	1	0	2	M
04A Clean-up of Contaminated Sites 570.201(d)		0	0	0			0	M
Public Services	05 Public Services (General) 570.201(e)	0	5	5	5	5	20	M
	05A Senior Services 570.201(e)	0	20	20	20	20	80	H
	05B Handicapped Services 570.201(e)	0	0	0			0	M
	05C Legal Services 570.201(E)	0	0	0			0	M
	05D Youth Services 570.201(e)	50	50	50	50	50	250	H
	05E Transportation Services 570.201(e)	0	20	20	50	50	140	H
	05F Substance Abuse Services 570.201(e)	0	0	0			0	L
	05G Battered and Abused Spouses 570.201(e)	0	5	5	5	10	25	H
	05H Employment Training 570.201(e)	0	0	0			0	M
	05I Crime Awareness 570.201(e)	0	0	0			0	M
	05J Fair Housing Activities (if CDBG, then subject to 570.201(e))	1	1	1	1	1	5	H
	05K Tenant/Landlord Counseling 570.201(e)	0	0	0			0	L
	05L Child Care Services 570.201(e)	0	0	0			0	L
	05M Health Services 570.201(e)	0	0	0			0	M
05N Abused and Neglected Children 570.201(e)	0	5	10	10	10	35	H	
05O Mental Health Services 570.201(e)	0	0	0			0	M	

	05P Screening for Lead-Based Paint/Lead Hazards Poison 570.201(e) (as part of minor home repair)	0	2	2	2	4	20	M
	05Q Subsistence Payments 570.204	50	50	50	50	50	150	H
	05R Homeownership Assistance (not direct) 570.204	0	0	0	0	0	0	L
	06 Interim Assistance 570.201(f)	0	5	5	5	5	20	H
	10 Removal of Architectural Barriers 570.201(k)	0	5	5	5	5	20	H
	11 Privately Owned Utilities 570.201(l)	0	0	0			0	L
	15 Code Enforcement 570.202(c)	15	15	15	15	15	60	H
	16B Non-Residential Historic Preservation 570.202(d)	0	0	0	0	0	0	M
	17A CI Land Acquisition/Disposition 570.203(a)	0	0	0			0	L
	17B CI Infrastructure Development 570.203(a)	0	0	0			0	L
	17C CI Building Acquisition, Construction, Rehabilitation 570.203(a)	0	0	0			0	L
	17D Other Commercial/Industrial Improvements 570.203(a)	0	0	3	2	0	5	M
	18A ED Direct Financial Assistance to For-Profits 570.203(b)	0	0	3	2	0	5	M
	18B ED Technical Assistance 570.203(b)	0	3	2			5	M
	18C Micro-Enterprise Assistance	0	0	0	2	3	5	M
	19C CDBG Non-profit Organization Capacity Building	1	1	1	1	1	5	H
	19D CDBG Assistance to Institutes of Higher Education	0	0	0			0	L
	19E CDBG Operation and Repair of Foreclosed Property	0	0	0			0	L
	20 Planning 570.205	0	0	0			0	L
	21A General Program Administration 570.206	1	1	1	1	1	5	H
	21B Indirect Costs 570.206	0	0	0			0	L
	21D Fair Housing Activities (subject to 20% Admin cap) 570.206	1	1	1	1	1	5	H
	21E Submissions or Applications for Federal Programs 570.206	0	0	0	0	0	0	H
	22 Unprogrammed Funds	0	0	0			0	L
CDBG	Acquisition of existing rental units	0	0	0			0	L
	Production of new rental units	0	0	0			0	L
	Rehabilitation of existing rental units	0	0	0			0	L
	Rental assistance	4	4	4	4	4	20	H
	Homeownership assistance	0	0	0			0	M
<b>Totals</b>		124	1,645	655	1,182	685	3,185	

## Antipoverty Strategy (91.215 (h))

1. Describe the jurisdiction's goals, programs, and policies for reducing the number of poverty level families (as defined by the Office of Management and Budget and revised annually). In consultation with other appropriate public and private agencies, (i.e. TANF agency) state how the jurisdiction's goals, programs, and policies for producing and preserving affordable housing set forth in the housing component of the consolidated plan will be coordinated with other programs and services for which the jurisdiction is responsible.

The City of League City approaches the reduction of poverty in a number of ways. First, the City uses CDBG dollars to assist public service agencies in providing services that enhance the available disposable income of their clients. The City has funded and plans to continue to fund Interfaith Caring Ministries that provides utility assistance, food assistance and other support assistance to those in dire need. The City also has funded Bay Area Turning Point, an agency that provides shelter, education, and job training to victims of domestic abuse. Its residents come to the shelter with virtually no resources or income, and through the supportive services provided, they are able to secure employment that will allow them to move into independent living. By providing CDBG funding for housing rehabilitation and compassionate code enforcement, the City helps to ensure that the low-moderate income homeowners, particularly the elderly and disabled, are able to remain in their homes and preserve the value of their property. As more and more of the elderly homeowners are opting for setting up reverse mortgages, preservation of their property values directly impacts the amount of the lump-sum or monthly payments that they can receive from this HUD-sponsored program.

The second approach to reducing poverty in League City is to increase the employment base by using incentives to attract new retail, office and industrial developments throughout the City. The 4B Corporation strives to increase the economic opportunities of businesses and residents within League City through a number of incentives to businesses. Businesses eligible for incentives include manufacturers, distributors, corporate offices or service centers, research and development facilities and regional tourist related facilities. Some larger regional retail business development projects may be eligible for certain types of incentives, including:

**Abatement of Property Taxes:** The City of League City may grant up to 100% abatement of property taxes on buildings, fixed machinery and business personal property for up to 10 years. Minimum qualifications for tax abatement are \$1 million in real property improvements and 15 new jobs created. Up to 50% tax abatement may be granted for eligible projects with \$500,000 to \$1 million in improvements and 7 jobs created.

Galveston County may join the City of League City on projects that meet the county's eligibility requirements. Certain manufacturing or research and development corporations may qualify for reduction in school district property taxes under the Texas Economic Development Act. This incentive program was created in order to provide companies making a substantial capital investment to receive tax credits from participating local school districts.

**Freeport Property Tax Exemption:** The Freeport exemption exempts taxes on eligible inventory that is transported out of the state of Texas within 175 days of acquisition. Inventory property may first be assembled, stored, manufactured, processed or fabricated locally.

**Empowerment Zone:** Qualified businesses locating in League City's Empowerment Zone may be eligible for assistance in extending water and sewer lines, paving public streets or the cost of municipal fees. The zone is located along the East side of State Highway 3, between Walker Street and the city limits.

**Municipal Grants:** The City of League City may provide loans and grants of city funds as well as City employees and equipment to promote economic development projects within the City. Eligible projects may receive sales tax grants, franchise fee grants or utility line extensions.

**Skills Development Fund Program:** The State of Texas provides grants to businesses for training programs carried out through community and technical colleges.

**Texas Enterprise Fund:** The Texas Enterprise Fund can be used for a variety of economic development projects, including infrastructure development, community development, job training programs, and business incentives. These funds are used primarily to attract new business to the State of Texas or to assist with the substantial expansion of an existing business as part of a competitive recruitment situation.

**2. Identify the extent to which this strategy will reduce (or assist in reducing) the number of poverty level families, taking into consideration factors over which the jurisdiction has control.**

The first strategy will assist in making emergency funds available to those on the verge of losing their utilities or homes. This is a stop-gap measure to ensure that their lives and employment are not interrupted due to losing electricity or water, or more tragically their home. By providing shelter and job training for victims of domestic abuse, Bay Area Turning Point is also providing a stop-gap measure to provide a safe environment for women while training for employment at a livable wage.

The second approach has provided a number of corporations with the incentives needed to relocate to League City or to expand current businesses in the City, thus providing a number of new jobs.

**Low Income Housing Tax Credit Coordination (91.315 (k))**

- 1. (States only) Describe the strategy to coordinate the Low-income Housing Tax Credit (LIHTC) with the development of housing that is affordable to low- and moderate-income families.**

Not Applicable

## NON-HOMELESS SPECIAL NEEDS

### Specific Special Needs Objectives (91.215)

**1. Describe the priorities and specific objectives the jurisdiction hopes to achieve over a specified time period.**

There are housing and supportive services needs for low-income special needs populations, including the elderly, disabled, persons with HIV/AIDS, and chronic substance abusers. The following section details the estimated number of persons in each special needs/limited clientele category. The summary table is included here and in the next section.

**Table 25 – Non-homeless Special Needs Populations  
(includes housing and social services)**

	Non-Homeless Special Needs Including HOPWA	Needs	Currently Available	GAP	5 Year Quantities					Total	Priority Need: H, M, L	Plan to Fund? Y N
					Year 1	Year 2	Year 3	Year 4	Year 5			
					Goal	Goal	Goal	Goal	Goal	Goal		
Supportive Services Needed	60. Elderly	3,466	275	3,191	0	23	23	23	23	92	H	Y
	61. Frail Elderly	2,117	324	1,793	0	0	0	0	0	0	M	N
	62. Persons w/ Severe Mental Illness	157	20	130	0	0	0	0	0	0	L	N
	63. Developmentally Disabled	750	25	725	0	0	0	0	0	0	M	N
	64. Physically Disabled	2,249	30	2,219	0	2	2	2	2	8	M	N
	65. Alcohol/Other Drug Addicted	2,075	250	1,825	0	0	0	0	0	0	L	N
	66. Persons w/ HIV/AIDS & their families	180	0	180	0	0	0	0	0	0	L	N
	67. Public Housing Residents	NA	NA	A NA	NA	NA	NA	NA	NA	NA	NA	NA
	<b>Total</b>	<b>10,994</b>	<b>924</b>	<b>10,063</b>	<b>0</b>	<b>20</b>	<b>20</b>	<b>20</b>	<b>20</b>	<b>80</b>		

*Sources: 2006-2010 American Community Survey; Texas Department of Health Services; National Institute of Mental Health; Texas Commission on Alcoholism and Drug Abuse*

The priorities were established based on the number of individuals in each limited clientele subpopulation, the priorities given in the public needs survey (results included in Community Development section), the availability of agencies to provide services and the limited funding available through CDBG for the services. The objectives for the elderly include public services to 20 elderly in the general population and 3 housing rehabilitation projects for elderly homeowners per year for years 2 through 5. Two physically disabled homeowners will be provided compassionate code enforcement and/or housing rehabilitation each year from year 2 through 5.

**2. Describe how Federal, State, and local public and private sector resources that are reasonably expected to be available will be used to address identified needs for the period covered by the strategic plan.**

The City of League City plans to use CDBG funds to provide housing rehabilitation, compassionate code enforcement and public services to the special needs populations. The tables in the Housing section and the Community Development section detail the number of clients to be served during the next 5 years with CDBG funds.

The City of League City also provides a senior center and extensive senior services at the center through the City's general funds. Private sector resources include assisted living, nursing home and group home facilities for the various populations. However, none in League City are subsidized for low-moderate income individuals.

**Non-homeless Special Needs (91.205 (d) and 91.210 (d)) Analysis (including HOPWA)**

\*Please also refer to the Non-homeless Special Needs Table in the Needs.xls workbook.

**1. Estimate, to the extent practicable, the number of persons in various subpopulations that are not homeless but may require housing or supportive services, including the elderly, frail elderly, persons with disabilities (mental, physical, developmental, persons with HIV/AIDS and their families), persons with alcohol or other drug addiction, victims of domestic violence, and any other categories the jurisdiction may specify and describe their supportive housing needs. The jurisdiction can use the Non-Homeless Special Needs Table (formerly Table 1B) of their Consolidated Plan to help identify these needs.**

\*Note: HOPWA recipients must identify the size and characteristics of the population with HIV/AIDS and their families that will be served in the metropolitan area.

Below is a repeat of the table in the prior section which details estimates of need, available services/housing and gaps for each of the non-homeless special needs population groups. The planned number of service units and houses to be rehabilitated for these groups are also included.

**Table 26 – Non-homeless Special Needs Populations**

Non-Homeless Special Needs Including HOPWA	Needs	Currently Available	GAP	5 Year Quantities					Total	Priority Need: H, M, L	Plan to Fund? Y N	
				Year 1	Year 2	Year 3	Year 4	Year 5				
				Goal	Goal	Goal	Goal	Goal	Goal			
Supportive Services Needed	60. Elderly	3,466	275	3,191	0	23	23	23	23	92	H	Y
	61. Frail Elderly	2,117	324	1,793	0	0	0	0	0	0	M	N
	62. Persons w/ Severe Mental Illness	157	20	130	0	0	0	0	0	0	L	N
	63. Developmentally Disabled	750	25	725	0	0	0	0	0	0	M	N
	64. Physically Disabled	2,249	30	2,219	0	2	2	2	2	8	M	N
	65. Alcohol/Other Drug Addicted	2,075	250	1,825	0	0	0	0	0	0	L	N
	66. Persons w/ HIV/AIDS & their families	180	0	180	0	0	0	0	0	0	L	N
	67. Public Housing Residents	NA	NA	A NA	NA	NA	NA	NA	NA	NA	NA	NA
	Total	10,994	924	10,063	0	20	20	20	20	80		

**Elderly**

According to the 2006-2010 American Community Survey (ACS) from the Census Bureau, there are 5,583 persons aged 65 years or older in League City, with 2,117 being frail elderly. Of those living independently, 1,793 have some level of disability. The ACS estimates that frail elderly 324 are living in group quarters. There are 100 elderly households living below poverty.

All of the non-institutionalized frail elderly need some level of supportive services, with transportation being one of the most needed services. Currently, there is no affordable private transportation available to the elderly of League City. Regional public “on-demand” transportation service is available to the elderly and those in need through private transit companies. However, the capacity is extremely limited for these transportation providers.

The City has placed a high priority on the development and implementation of services, including transportation, home-delivered meals as well as service center/recreation and congregate meals for the elderly.

**Non-elderly Physically Disabled**

There are 2,249 non-elderly disabled adults under 65 years of age in League City. Of these it is estimated that 70% are at least marginally employed. According to the 2006-2010 ACS, 375 of the households with at least one disabled person receive food stamps. However, a great many are employed below a livable wage, though

cross tabulations for poverty status and housing conditions among the disabled are not available.

The Texas Department of Health Services' Special Services to Persons with Disabilities includes services provided to community care clients in a variety of settings. These currently include providing interpreter services to deaf clients in the community and adult day care for clients with special needs. Clients receive counseling, personal care, and help with the development of skills needed for independent living in the community. The individual must be a Medicaid recipient or be determined financially eligible for Title XX services with income not exceeding \$1,536 per month for an individual or \$3,072 per month for a couple. In addition, the individual must meet functional needs criteria, with the level of impairment measured during a client needs assessment interview.

### **Mentally Disabled, Substance Abusers and Dually Diagnosed**

There are no good statistics on the number of residents with some level and type of mental disability, either severe mental illness or mental deficiency. Likewise, there are no reliable statistics on the number of chronic substance abusers and dually diagnosed individuals in League City. The National Institute on Mental Health estimates that during any given year 30% of the adult population in the United States will have some form of mental illness or disability or addiction problem, with 3% of the population having co-occurring disorders. Between 5 and 6% of the adults have a serious mental illness, which affects their ability to work and live independently. Applying national statistics to Galveston County would imply that County-wide approximately 11,500 adults have a severe or chronic mental illness, substance abuse problem or both within the County. No data exist on the number within the City of League City, however, based on League City's portion of the total Galveston County population, it can be estimated that approximately 2,232 League City residents have a severe or chronic mental illness, substance abuse problem or both. With no comprehensive mental health services or residential treatment facilities located in the City, the majority of the severely mentally ill, chronic substance abusers and those with co-occurring disorders live in neighboring communities where needed services are available.

### **People with HIV/AIDS**

The Coastal Texas HIV Consortium provides Ryan White and other related HIV/AIDS services to Galveston County, including the majority of League City. The Ryan White Planning Council of Harris County tracks and provides services to the Houston PMSA, including a portion of League City. Based on the results of a needs assessment conducted for the Ryan White Planning Council in 2005, none of the Ryan White-funded HIV/AIDS patients live in League City. Due to the lack of transportation from League City to a Ryan White-funded clinic, it can be assumed that most HIV infected individuals living in Harris County live near Ryan-White facilities. The Texas Department of Health estimates that there are 656 persons living with HIV/AIDS in Galveston County. There is no information on the number of people living with HIV/AIDS residing in League City; however, if it is assumed that the geographic distribution of people living with HIV/AIDS in Galveston County is the same as the total population, it can be estimated that 180 people living with HIV/AIDS live in League City, at least 80 of whom are low- to moderate-income. League City and Galveston County residents are referred to appropriate programs available in the Galveston/Texas City and Houston Metropolitan Areas that serve and house people living with HIV/AIDS.

**2. Identify the priority housing and supportive service needs of persons who are not homeless but may or may not require supportive housing, i.e., elderly, frail elderly, persons with disabilities (mental, physical, developmental, persons with HIV/AIDS and their families), persons with alcohol or other drug addiction by using the Non-homeless Special Needs Table.**

The priority housing and supportive service needs of the limited clientele population are outlined below:

**Table 27 – Housing and Supportive Service Needs of Limited Clientele**

Non-Homeless Special Needs Including HOPWA		Needs	Currently Available	GAP	Priority Need: H, M, L
Housing Needed	52. Elderly	705	0	705	H
	53. Frail Elderly	2,117	324	1,793	L
	54. Persons w/ Severe Mental Illness	57	0	57	L
	55. Developmentally Disabled	650	0	650	M
	56. Physically Disabled	808	20	788	M
	57. Alcohol/Other Drug Addicted	50	25	25	L
	58. Persons w/ HIV/AIDS & their families	60	0	60	L
	59. Public Housing Residents	NA	NA	NA	
	Total	4,447	369	4,078	
Supportive Services Needed	60. Elderly	3,466	275		H
	61. Frail Elderly	2,117	324		M
	62. Persons w/ Severe Mental Illness	157	20		L
	63. Developmentally Disabled	750	25		M
	64. Physically Disabled	2,249	30		M
	65. Alcohol/Other Drug Addicted	2,075	250		L
	66. Persons w/ HIV/AIDS & their families	180	0		L
	67. Public Housing Residents	NA	NA	NA	
	Total	10,994	924	10,063	

**3. Describe the basis for assigning the priority given to each category of priority needs.**

The priorities were established based on the number of individuals in each limited clientele subpopulation, the priorities given in the public needs survey (results included in Community Development section), the availability of agencies to provide services and the limited funding available through CDBG for the services.

**4. Identify any obstacles to meeting underserved needs.**

As with other needs in League City, money is the major obstacle for meeting the housing and supportive services needs of the limited clientele subpopulations. The City is not a HOME or HOPWA Participating Jurisdiction and any housing funds must come through the State of Texas.

The second obstacle is the limited number of viable agencies to provide services and housing for these subpopulations. With the few residents in some of the subpopulations coupled with the absence of ancillary services, the economies of scale do not exist for agencies to open housing programs and supportive services in League City. Those requiring housing and supportive services must relocate to larger cities, such as Houston, where services are accessible.

**5. To the extent information is available, describe the facilities and services that assist persons who are not homeless but require supportive housing, and programs for ensuring that persons returning from mental and physical health institutions receive appropriate supportive housing.**

There are no public subsidized programs or facilities in League City to assist persons who require supportive housing or services. All assisted living, nursing home and group home facilities are privately owned and require full payment by the resident. Private mental health and substance abuse professionals do serve League City as do private physicians, but there are no clinics or subsidized services for the subpopulations. There are many 12-step programs throughout the city in churches and other public settings.

**6. If the jurisdiction plans to use HOME or other tenant based rental assistance to assist one or more of these subpopulations, it must justify the need for such assistance in the plan.**

Not Applicable

### **Housing Opportunities for People with AIDS (HOPWA)**

\*Please also refer to the HOPWA Table in the Needs.xls workbook.

**1. The Plan includes a description of the activities to be undertaken with its HOPWA Program funds to address priority unmet housing needs for the eligible population. Activities will assist persons who are not homeless but require supportive housing, such as efforts to prevent low-income individuals and families from becoming homeless and may address the housing needs of persons who are homeless in order to help homeless persons make the transition to permanent housing and independent living. The plan would identify any obstacles to meeting underserved needs and summarize the priorities and specific objectives, describing how funds made available will be used to address identified needs.**

**2. The Plan must establish annual HOPWA output goals for the planned**

number of households to be assisted during the year in: (1) short-term rent, mortgage and utility payments to avoid homelessness; (2) rental assistance programs; and (3) in housing facilities, such as community residences and SRO dwellings, where funds are used to develop and/or operate these facilities. The plan can also describe the special features or needs being addressed, such as support for persons who are homeless or chronically homeless. These outputs are to be used in connection with an assessment of client outcomes for achieving housing stability, reduced risks of homelessness and improved access to care.

3. For housing facility projects being developed, a target date for the completion of each development activity must be included and information on the continued use of these units for the eligible population based on their stewardship requirements (e.g. within the ten-year use periods for projects involving acquisition, new construction or substantial rehabilitation).
4. The Plan includes an explanation of how the funds will be allocated including a description of the geographic area in which assistance will be directed and the rationale for these geographic allocations and priorities. Include the name of each project sponsor, the zip code for the primary area(s) of planned activities, amounts committed to that sponsor, and whether the sponsor is a faith-based and/or grassroots organization.
5. The Plan describes the role of the lead jurisdiction in the eligible metropolitan statistical area (EMSA), involving (a) consultation to develop a metropolitan-wide strategy for addressing the needs of persons with HIV/AIDS and their families living throughout the EMSA with the other jurisdictions within the EMSA; (b) the standards and procedures to be used to monitor HOPWA Program activities in order to ensure compliance by project sponsors of the requirements of the program.
6. The Plan includes the certifications relevant to the HOPWA Program.

Not Applicable

### Specific HOPWA Objectives

1. Describe how Federal, State, and local public and private sector resources that are reasonably expected to be available will be used to address identified needs for the period covered by the strategic plan.

Not Applicable

## OTHER NARRATIVE

**Include any Strategic Plan information that was not covered by a narrative in any other section.**

## ATTACHMENTS

Certifications

On-Line Survey

CHAS Table

Housing Affordability Mismatch Table

Homeless Needs Table

Non-Housing Community Development Needs Table

Public Notices

PowerPoint Presentation