



**PY 2021 Consolidated Annual
Performance & Evaluation Report
(CAPER) for the
Community Development Block Grant
(CDBG)**

Prepared by

City of League City

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CR-05 - Goals and Outcomes

Progress the jurisdiction has made in carrying out its strategic plan and its action plan.

91.520(a)

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

During PY 2021, League City addressed the most critical public service needs in the community – services to at-risk youth, food assistance, and emergency rent/utility assistance. The PY 2021 Annual Action Plan proposed the improvement to storm water drainage by enhancing the drainage along Wisconsin Avenue and continuing the drainage from the end of Wisconsin Avenue to Clear Creek. In addition, the City proposed to complete the PY 2020 infrastructure project consisting of the reconstruction of 3rd Street.

1. PY 2020 3rd Street Reconstruction: This project was completed in PY 2021 providing improved east-west mobility north of Main Street through the Main Street/Park Avenue Target Area. The total cost of the project, using PY 2020 funds, was \$338,075.94 and served 1,795 residents within the north side of the target area. This area north of Main consists of Block Group 3 of Census Tract 721300, with 43.18% LMI, exceeding League City's LMI exception of 37.73%.
2. Wisconsin Avenue Drainage: This project was planned and budgeted to begin in PY 2021. However, due to a delay in the design and engineering of the project, it was placed on hold. The delay continues and League City is in the process moving forward with the PY 2022 infrastructure project in order to meet August 2023 timeliness. It is anticipated that the drainage project will begin in late PY 2022 or in PY 2023 and be completed in PY 2023 or PY 2024.
3. Communities in Schools – Bay Area: Communities in Schools provided a total of 1,482 hours of case management and counseling to 157 unduplicated at-risk youth living in League City and attending one of 4 Clear Creek ISD schools.
4. Interfaith Caring Ministries Food Pantry: ICM provided food to a total of 667 low- to moderate-income persons in 242 unduplicated League City households.
5. Interfaith Caring Ministries Emergency Rent/Utility Assistance for CDBG clientele: ICM provided one-time rent and/or utility assistance to 107 low- to moderate-income individuals in 49 League City.
6. Continuation of PY 2020 Interfaith Caring Ministries COVID-related Rent/Utility Assistance: ICM also provided emergency rent and/or utility assistance for up to six consecutive months for those households economically impacted by COVID-19 and facing eviction or utility service termination. Through August, 2022, ICM has provided COVID-related emergency rent/utility assistance to 413 individuals 147 League City households, averaging just under two consecutive

months per household. Sixty percent of the households received assistance for one or two months, while 23% received assistance for 3 months and the remaining 16% required more than three months of assistance. During PY 2021, ICM provided COVID-funded assistance to 92 individuals in 31 of the total 147 households. The number of households needing housing assistance due to the impacts of COVID 19 declined significantly during the last half of PY 2021.

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

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

Goal	Category	Source / Amount	Indicator	Unit of Measure	Expected – Strategic Plan	Actual – Strategic Plan	Percent Complete	Expected – Program Year	Actual – Program Year	Percent Complete
Code Enforcement	Non-Housing Community Development		Housing Code Enforcement/Foreclosed Property Care	Household Housing Unit	10	0	0.00%			
Domestic Violence Services	Homeless Non-Housing Community Development		Public service activities other than Low/Moderate Income Housing Benefit	Persons Assisted	25	0	0.00%			
Domestic Violence Services	Homeless Non-Housing Community Development		Homeless Person Overnight Shelter	Persons Assisted	10	0	0.00%			
Facility Improvements	Non-Housing Community Development		Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit	Persons Assisted	500	0	0.00%			
Fair Housing Activities	Fair Housing Activities		Other	Other	10	0	0.00%			

Food Pantry	Non-Housing Community Development	CDBG: \$3,914.00	Public service activities other than Low/Moderate Income Housing Benefit	Persons Assisted	750	667	88.93%	500	667	133.40%
Health Services	Non-Housing Community Development		Public service activities other than Low/Moderate Income Housing Benefit	Persons Assisted	25	0	0.00%			
Owner Occupied Housing Rehabilitation	Affordable Housing		Homeowner Housing Rehabilitated	Household Housing Unit	2	0	0.00%			
Park Improvements	Non-Housing Community Development		Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit	Persons Assisted	2425	0	0.00%			
Senior Services	Non-Housing Community Development		Public service activities other than Low/Moderate Income Housing Benefit	Persons Assisted	15	0	0.00%			
Sidewalk Improvements	Non-Housing Community Development		Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit	Persons Assisted	2425	0	0.00%			

Storm Water Drainage	Non-Housing Community Development	CDBG: \$344,861	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit	Persons Assisted	2425	0	0.00%	1795	0	0.00%
Street Improvements	Non-Housing Community Development	CDBG: \$	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit	Persons Assisted	2425	1795	74.02%	1795	1795	100%
Street Lighting Improvements	Non-Housing Community Development		Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit	Persons Assisted	2425	0	0.00%			
Subsistence Payments	Affordable Housing Non-Housing Community Development	CDBG: \$29,580.00	Homelessness Prevention	Persons Assisted	200	107	53.50%	40	107	267.50%
Transportation Services	Non-Housing Community Development		Public service activities other than Low/Moderate Income Housing Benefit	Persons Assisted	15	0	0.00%			
Youth Service	Non-Housing Community Development	CDBG: \$38,000.00	Public service activities other than Low/Moderate Income Housing Benefit	Persons Assisted	200	157	78.50%	75	157	209.33%

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

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

League City identified in the PY 2016-2021 Consolidated Plan a number of high priority activities, with youth services, emergency rent/utility assistance, food assistance, drainage improvements, street improvements and sidewalk improvements having the greatest need and opportunities for addressing the needs. Opportunities include qualified public service agencies to carry out the public service activities and adequate general fund dollars to assist in carrying out infrastructure projects. In PY 2021, League City completed the PY 2020 3rd Street reconstruction project. To the extent allowed through HUD regulations, League City also funded youth services, rent/utility assistance and food assistance, three successful programs. Improving the storm water drainage in the Main Street/Park Avenue Target Area is a high priority need and main objective for the City. Drainage improvements were funded in part by PY 2021 CDBG funds along Wisconsin Avenue and from the end of Wisconsin to Clear Creek through public undeveloped land. However, due to delays in the design and engineering for the project, the actual construction will not begin until mid- to late PY 2022.

Addressing the needs of at-risk youth and their families has been a high priority for League City for decades. As the Communities in Schools-Bay Area (CIS-BA) program has grown and added more schools in which they provide case managers/counselors, League City has invested CDBG funds into their program. In PY 2021 four schools were served by counselors partially funded by the CDBG program. CIS-BA addresses academics, attendance, behavior, and social service needs. For the schools in which CDBG funds were targeted, 87.1% of the students showed academic improvement and all students remaining throughout the year were promoted or graduated. In addition, 72.2% showed improvement in attendance; 73.7% showed improvement in behaviors, and 99.25% received assistance in identifying and accessing social services. The 157 unduplicated students received 1,482 hours of service. All of the students served were low- to moderate-income and 12 were homeless at intake.

Preventing homelessness and food insecurity are two high priorities for League City. The shortage of available funding makes it difficult for the City to provide substantial assistance to address these needs. Interfaith Caring Ministries (ICM) is the local agency that provides both emergency rent and/or utility assistance to address housing insecurity, and food through their food pantry to address food insecurity. With the 15% limit on the use of CDBG funds for public services and the lack of HOME or ESG funding, ICM was only able to receive CDBG funding for rents and utilities for a limited time. While the HUD regulations allow up to three consecutive months of assistance, in most all cases ICM limited assistance to one month for rent and/or utility payments. Those needing food assistance were eligible monthly and CDBG funding was

provided to ICM for the salary of the front-line manager of the pantry, who directly serves the clients. During PY 2021 ICM provided emergency rent and/or utility assistance to 49 unduplicated households representing 107 individuals. In addition, 667 individuals in 242 unduplicated households received food assistance at least once during the year. In PY 2020, ICM also received a large CDBG-CV grant to provide up to six consecutive months of emergency rent and/or utility assistance to those negatively affected by COVID-19. During PY 2021, ICM provided 46 months of rental assistance to 30 unduplicated households (92 residents) affected by COVID-19. Throughout the entire COVID-19 program, ICM provided 212 months of rental assistance to 86 households with 247 residents.

During PY 2021, League City developed its PY 2022-2026 Consolidated Plan and Fair Housing Plan (Analysis of Impediments) as well as completing the PY 2020 CAPER. With the assistance of a CDBG consultant, the program was managed effectively and all goals with the exception of the drainage program were surpassed. Monthly desk monitorings were conducted in conjunction with each reimbursement request and an annual on-site monitoring was conducted for both CIS-BA and ICM. There were no findings or concerns during the monitorings.

CR-10 - Racial and Ethnic composition of families assisted

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

91.520(a)

	CDBG
White	674
Black or African American	220
Asian	2
American Indian or American Native	11
Native Hawaiian or Other Pacific Islander	0
Other/Multi-racial	24
Total	931
Hispanic	352
Not Hispanic	579

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

Note: Other/Multi-racial category has been added in this Word version but does not exist in the IDIS format, nor is there the option to add a category in IDIS. As a result, the totals for race are lower by 24 and by 2 for Hispanics in IDIS. The above table is complete and correct.

Narrative

Comparing services by race/ethnicity to city totals shows that a significantly higher percent of beneficiaries are minority compared to the minority population and a much lower percentage of non-Hispanic whites received services than would be indicated by the city's percent of non-Hispanic white population.

The city population, according to the 2020 Census, is 60.1% non-Hispanic white, 7.3% African American, and 20.9% Hispanic. The beneficiaries of the public services were 37.8% non-Hispanic white, 23.6% African American, and 34.6% white Hispanic. The remaining 4% of beneficiaries were multi-racial or other. In PY 2021, the City expended no funds on the current year infrastructure activity.

The PY 2020 road reconstruction was completed during PY 2021. Third Street is located in Census Tract 721300, Block Group 3, with a low-mod income of 43.18%, above the City's exception percentage of 37.73%. According to the 2020 Census, 26.9% of the residents are Hispanic, 9.5% are African American, and 6.2% are a combined other or multi-race, with 57.4% being non-Hispanic white. Additionally, the construction firm selected to reconstruct the road verified that 100% of its employees were Section 3 eligible upon hire. Of the 2,936.5 labor hours all were Section 3 eligible and 824 (28.06%) were targeted hours, using the cities of League City and Dickinson as the area for determining targeted Section 3 workers.

CR-15 - Resources and Investments 91.520(a)

Identify the resources made available

Source of Funds	Source	Resources Made Available	Amount Expended During Program Year
CDBG	public - federal	\$849,834.88	\$396,919.94
Section 108	public - local	0	

Table 3 - Resources Made Available

Narrative

A total of \$396,919.94 was expended during PY 2021. Two public service agencies, including 3 projects, were funded in PY 2021 and expended all of the \$71,494.00 allocated (maximum allowed 15% of award). The City expended \$49,500 (10.39% of the award) on program administration. Of the \$338,075.94 expended on the PY 2020 3rd Street reconstruction, \$275,925.94 was invoiced and reimbursed in PY 2021. The Wisconsin Avenue drainage project has not begun. The preliminary amount set aside for the project is \$344,812, though the activity has not been funded in IDIS and is pending the completion of the design, engineering and environmental assessment.

While the table above from the IDIS form shows a Section 108 loan as a source of funds, League City never applied for Section 108 funds, though it was proposed in the PY 2017 Consolidated Plan.

Identify the geographic distribution and location of investments

Target Area	Planned Percentage of Allocation	Actual Percentage of Allocation	Narrative Description
Main St/Park Ave NRSA	67.4%	0.0%	There has been a delay in completing the design and engineering of the Wisconsin Ave drainage project. As a result, the Environmental Assessment and RROF has not been completed and the project will not be funded or commence until mid- to late PY 2022.

Table 4 – Identify the geographic distribution and location of investments

Narrative

The only geographic-based project in the PY 2021 Annual Action Plan is the Wisconsin Avenue drainage project. Due to delays in pre-construction activities, the Request for Release of Funds has not been submitted to HUD and the project has not been funded. Construction is slated to begin in mid- to late PY 2022 and it is anticipated that at least 67.4% of the PY 2021 award will be expended on the project. The City did complete the PY 2020 road reconstruction project and \$275,925.94 of the \$338,075.94 from the PY 2020 award was expended in PY 2021. The 3rd

Street project represented 75% of the total PY 2020 allocation and 69.52% of PY 2020 and PY 2021 funds expended during the PY 2021 program year.

Leveraging

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

The CDBG program has no matching requirements. However, all projects undertaken with CDBG funds have additional funding to ensure the broadest scope of services to the greatest number of low-mod income residents who are in need.

During PY 2021, approximately \$460,000 was leveraged toward the PY 2021 projects, with \$120,994 expended in CDBG funds. An additional \$275,925.94 of CDBG funds were reimbursed during PY 2021 for the PY 2020 3rd Street reconstruction with \$297,459.15 paid during PY 2021 with City general funds. The total road reconstruction was funded 48% with CDBG dollars and 52% with general funds. CIS-BA and ICM leveraged \$1.28 in other funds for every \$1.00 of CDBG funds awarded, totaling \$91,858.23 in non-CDBG assistance to League City clients. Additionally, neither agency received CDBG funding for program administration. The City expended \$700,831 on the 3rd Street reconstruction, a PY 2020 activity completed in PY 2021. Of the total, \$338,075.94 was CDBG funding and \$362,755.06 (52%) was funded through general funds. It is projected that the PY 2021 drainage project will be funded at least 50% by general funds. Annually, the City only funds the contract CDBG consultant with CDBG funds. All City staff and direct expenses, such as public postings of public hearings and meetings, trainings, travel and supplies are funded through general funds, resulting in at least a 1:1 match/leverage of CDBG funding.

CR-20 - Affordable Housing 91.520(b)

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

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

Table 5 – Number of Households

	One-Year Goal	Actual
Number of households supported through Rental Assistance	18	49
Number of households supported through The Production of New Units	0	0
Number of households supported through Rehab of Existing Units	0	0
Number of households supported through Acquisition of Existing Units	0	0
Total	0	0

Table 6 – Number of Households Supported

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

Note that the instructions indicate that individuals should be counted in the above tables, however the table titles indicate households are to be counted. The number of households served through rental assistance is provided about.

League City does not receive HOME or ESG funding and must rely solely on its CDBG allocation to support affordable housing. No affordable housing units were provided in PY 2021. ICM provided emergency rental assistance to 49 households (107 persons) with CDBG funding. More than twice the projected goal was reached. In addition, not included in Table 12 above, ICM also utilized CDBG-CV funding for 2020 Interfaith Caring Ministries for emergency rent and/or utility assistance for up to six consecutive months to those households economically impacted by COVID-19 and facing eviction or utility service termination. During PY 2020 and PY 2021, through

August 2022, ICM has provided COVID-related emergency rent/utility assistance to 413 individuals in 147 League City households.

Discuss how these outcomes will impact future annual action plans.

Future action plans are impacted by the small CDBG award and the limit of 15% of the award to be used for public services. Each year, the City allocates the maximum allowed to public services. While the need is greater than the resources can support, there is very little adjustment that can be made to provide additional funding for rental assistance and no funding for providing affordable housing units. For PY 2022, the City is funding a homeless service provider for the first time and as funding allows, will be assisting in securing housing for those families completing the shelter program.

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

Number of Households Served	CDBG Actual	HOME Actual
Extremely Low-income	64	0
Low-income	37	0
Moderate-income	6	0
Total	107	0

Table 7 – Number of Households Served

Narrative Information

Note: Table 13 above is labeled “number of households served” while the question and IDIS both ask for the number of persons served. Persons, not households have been included in the table in order to agree with the IDIS table regarding beneficiaries by income. As indicated in Table 12, 49 households were assisted.

ICM provided emergency rental and/or utility assistance to 49 households housing 107 persons during PY 2021 with the assistance of CDBG funding, and in several instances augmenting CDBG beneficiary’s assistance with other private funds. In addition to the PY 2021 CDBG funding, ICM has also utilized CDBG-CV funding to provide 147 League City households with 1 to 6 consecutive months of rent and/or utility assistance to those impacted by COVID-19 since August 2020.

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

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

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

Gulf Coast Homeless Coalition conducts the annual Point In Time and Housing Inventory Count for Galveston County. As part of the Texas Balance of State, Texas Homeless Network receives the information gathered during the surveys and shares the information with League City. However, the PIT interviews and counts are not coded by jurisdiction, providing no separate statistics for League City. During PY 2021 League City reached out to Bay Area Turning Point and Family Promise of Clear Creek to determine the estimated count and current needs of the homeless persons in League City and to encourage both agencies to apply for CDBG funding. Family Promise did apply and is receiving funding in PY 2022. During the program year, the City will be in regular contact with Family Promise, which reaches out to homeless families to provide shelter and assistance in accessing permanent housing.

Addressing the emergency shelter and transitional housing needs of homeless persons

The only homeless shelter in League City is Family Promise of Clear Creek which serves homeless families who have lost housing due to unforeseen short-term circumstances. The agency provides shelter for up to three months and assists the families in accessing permanent housing. Funds are provided for initial rent and deposits and supportive services continue after the families have secured permanent housing. Bay Area Turning Point, not located in League City but serving the area, is a crisis center and shelter for victims of domestic violence and sexual assault. At this time neither agency provides transitional housing, though there is a need for both populations served by Family Promise and Bay Area Turning Point.

Helping low-income individuals and families avoid becoming homeless, especially extremely low-income individuals and families and those who are: likely to become homeless after being discharged from publicly funded institutions and systems of care (such as health care facilities, mental health facilities, foster care and other youth facilities, and corrections programs and institutions); and, receiving assistance from public or private agencies that address housing, health, social services, employment, education, or youth needs

Interfaith Caring Ministries provides emergency rental assistance to prevent homelessness of those facing eviction. There are no public systems of care or housing programs in the immediate area, including no public housing authority. The nearest correctional facilities are in downtown Houston near multiple housing and social service programs and Galveston Island,

also near housing and social service agencies.

Youth needs are identified and addressed by Clear Creek ISD through state and property tax funding and by Communities In Schools – Bay Area through a plethora of funding sources, including League City CDBG dollars. CIS-BA provides case managers/counselors in most League City schools to assess and address the academic, behavioral and social service needs of the students and their families.

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

The only program in League City to help homeless persons make the transition to permanent housing is Family Promise. The agency provides shelter and services to homeless families and assists them in accessing and maintaining permanent housing. During PY 2022, it is anticipated that a collaboration among Family Promise, Interfaith Caring Ministries and League City can result in a partnership between the two housing agencies to provide additional funds for rental assistance to those exiting homelessness. There are no programs for chronically homeless or unaccompanied youth. Without a public housing authority serving League City there are no public affordable housing units.

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

Actions taken to address the needs of public housing

League City has no public housing authority providing housing or housing vouchers. One small area of League City is in Harris County and Housing Choice Voucher holders would be able to access rental housing in that area through Harris County Housing Authority, but due to the distance from other services and employment no one has accessed units in League City.

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

Not Applicable. There is on public housing authority serving League City.

Actions taken to provide assistance to troubled PHAs

Not Applicable

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

Actions taken to remove or ameliorate the negative effects of public policies that serve as barriers to affordable housing such as land use controls, tax policies affecting land, zoning ordinances, building codes, fees and charges, growth limitations, and policies affecting the return on residential investment. 91.220 (j); 91.320 (i)

League City is a rapidly growing residential suburban city of Houston and has been developed primarily as an upper-middle income community. According to the 2020 American Community Survey, more than half (55.1%) of League City's housing has been built since 2000 and only 13.5% were built before 1980. Additionally, 80% of the housing in League City is single family and the vacancy rate is the lowest in the region. As a result, construction costs alone have made most housing unaffordable to the extremely low- and low-income households. The market drives the employment sectors that move to the area as well as land costs and the housing structure types that are profitable for developers to meet the needs and desires of the labor force. More than half of the employees in League City are in the financial, professional, scientific, educational, health care, management and administrative industries compared with approximately one-third of the employees in the MSA as a whole. Likewise, the median household income is \$109,073, 61% greater than the MSA as a whole.

Additionally, League City has very little available Extraterritorial Jurisdiction (ETJ) in which to expand and much of the existing city limits are developed. Much of the new housing developments in the area must be outside of League City.

The explosive growth in the health care industry is helping to drive more multi-family housing as more mobile health care workers, including interns and residents, are moving into the community. The aerospace industry is hiring more employees bringing more residents to League City and surrounding areas. This extensive development in and around League City has resulted in greater employment opportunities for the construction trades in the southern Harris County/northern Galveston County areas.

The Main Street Revitalization Program is helping to ameliorate the negative effects of public and private policies that serve as barriers to affordable housing. The program, located in one of the oldest areas of town and funded partly by CDBG funds, includes the reconstruction of interior streets, the improvement to the area drainage issues, additional parking and sidewalks, redevelopment of an elementary school, and park reconstruction. These revitalization efforts are resulting in stabilizing housing and providing better amenities and more businesses to serve the immediate neighborhoods which are predominately low- to moderate-income.

The land use controls and tax policies do not pose significant barriers to affordable housing. The City has a history of approving Planned Unit Developments which are able to develop housing with smaller lot sizes and other cost-saving features making affordable housing available for moderate-income households. League City is open to reviewing and approving any viable Low Income Housing Tax Credit (LIHTC) properties or other subsidized housing projects that are being submitted to the State of Texas for approval. Most of the LIHTC applications that the City has reviewed over the years are not

economically viable or are proposed for areas that are not zoned multi-family and can't support multi-family housing with the given infrastructure. The pre-construction development costs for infrastructure to support the population density makes the projects too costly to be profitable. There is no public housing authority in or near League City. One small area of League City is in Harris County and Harris County Housing Authority's Housing Choice Vouchers can be utilized in rental housing in the Harris County portion of League City. There are apartments in the Harris County portion of League City, however no Harris County housing voucher holders have chosen to access housing in League City.

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

The rapid growth and suburban nature of League City are the primary barriers to agencies that serve the lower-income and special needs populations from locating in League City. The economies of scale prohibit fiscally sound investments in League City for most non-profit public service and homeless agencies. In order for a comprehensive approach and continuity of care for those facing economic, health and social issues, service providers need to locate (1) where the majority of need exists, and (2) where the majority of ancillary and coordinating agencies exist. As the population of the north Galveston County area grows and the population diversifies, there will be the viability for more supportive services to locate in League City. But, at this point, few exist.

However, the City is committed to addressing the needs of the underserved and annually commits the allowable 15% of CDBG funds to those public service applicants. The City makes a concerted effort to identify and reach out to all public service agencies, inviting them to apply for CDBG funding. The limited annual allocation and the restriction to expend no more than 15% on public services, does not make applying for a share of the maximum allowable allocation feasible for most agencies. The agencies that do serve League City residents serve a much broader geographic area and the League City portion of their clientele is small and the administrative costs of requesting reimbursement for a small percentage of direct services are greater than the benefit.

For PY 2021, two agencies with a total of three projects applied for funding were funded. Other agencies were contacted and encouraged to apply but did not submit applications. Most indicated that their share of the allowable public service funding was insufficient for the amount of record-keeping and paperwork involved. During PY 2021, the City again reached out to agencies to apply for PY 2022 funds and Family Promise, a provider of shelter to homeless families, did apply and has been awarding PY 2022 funding. The two that applied in PY 2021 resulted in the City funding three programs. Communities in Schools-Bay Area and Clear Creek ISD addressed the need to improve academic, behavioral, and economic outcomes for youth through in-school counseling. CIS-BA also provides case management services to the entire family of its beneficiaries to assist them in identifying and accessing ancillary services. Interfaith Caring Ministries provided food and hygiene supplies to those who have food insecurity and provided rent and utility assistance to those facing eviction or utility service termination.

Utilizing the HUD waiver for Cares Act funds to allow the expenditure of more than 15% for Public

Services, the City has awarded 97% of the Round 1 and Round 3 funds to Interfaith Caring Ministries for COVID-related rent and utility assistance. Also, with the HUD waiver to allow up to 6 consecutive months of rental assistance, the funds have been able to allow residents time to find other employment or to remain stably housed while working for reduced pay due to COVID. Rental assistance during the pandemic has shown to be one of the greatest unmet needs in the community and the \$459,907 awarded to ICM has greatly helped address the need. During PY 2020 and PY 2021, ICM assisted 413 individuals in 147 League City households negatively affected by COVID-19 with up to 6 consecutive months of rent and/or utility assistance.

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

No actions were taken to reduce lead-based paint hazards in PY 2021 as the City did not expend any funds on housing activities. Information is available to residents and contractors who are rehabilitating older homes to alert them to the lead-based paint hazards and remedies, but the City does not monitor the rehabilitation or demolition projects with regards to lead-safe practices. In the years in which local, State or Federal funds are used by the City to rehabilitate housing, the City ensures that all lead-safe practices are followed. Interfaith Caring Ministries provides lead poisoning prevention information to their program clients.

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

The latest Census Bureau's American Community Survey estimates that League City has a 5.5% poverty rate, which is less than half of the 12.4% rate for Galveston County and of the 13.7% rate for the Metropolitan Statistical Area as a whole. Though League City's rate is well below the area, the City is concerned with the well-being of all of its residents living below poverty. However, the traditional services and employment sectors that can assist in lifting people out of poverty are located in Harris County, particularly in Houston and Pasadena.

The City's Economic Development Council works to encourage small businesses and to bring in large corporations that can employ unskilled and skilled labor. The health care industry in League City is growing dramatically with regional hospitals and medical care. These are employing individuals who were unemployed or underemployed. All City construction projects seek Section 3 businesses and the City assists individuals to become registered as a Section 3 business or individual. Additionally, the CDBG-funded construction projects traditionally are completed by firms that pay significantly higher hourly wages than the Davis Bacon Wage Rates require.

No direct actions were taken to reduce the number of poverty-level families using CDBG funds. The City has successfully contracted with construction firms that have a high percent of employees who entered employment as Section 3 qualified individuals and that encourages their employees to become Section 3 certified if they continue to qualify upon hiring. CIS-BA counsels the at-risk students to prevent dropping out and encourages and assists them in receiving higher education that will provide income above the poverty level. CIS-BA also counsels to parents on resources available to improve education and income. According to CIS-BA and CCISD information, in the 2021-2022 school year at least 1,000 homeless students were enrolled in Clear Creek ISD throughout their district boundaries which extend beyond League City.

CIS-BA served 12 homeless students in the four schools funded with CDBG dollars. Those students were provided counseling as were their guardians, and their progress tracked along the same trajectory as the other students served.

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

During PY 2021, the ones involved with the CDBG program attended several remote workshops on various topics, particularly the new Fair Housing and Section 3 requirements, and general topics on completing Consolidated Plans and Annual Action Plans and CAPERs.

The City works closely with its subrecipients to ensure that their activities meet all federal requirements and that they coordinate with one another when appropriate and to identify other funding sources and solutions to service gaps. City staff members and elected officials work closely with H-GAC, the regional Council of Governments, and neighboring entities, particularly in the area of transportation, hazard mitigation, and disaster recovery.

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

There are no public housing developments and no public housing authority in League City. The City does interface with the Harris County Housing Authority to determine if any of its Housing Choice Voucher holders are accessing rental units within the small area of League City which is situated in Harris County. Additionally, there are few social service agencies in League City and only one homeless agency. Through Bay Area Turning Point is not in the City, it does serve victims of domestic violence and sexual assault in League City. The League City Police Department works with BATP to provide transportation to the facilities for those who are in imminent danger. The one homeless agency, Family Promise of Clear Creek, is receiving PY 2022 CDBG funding for the first time and the City is working to coordinate their rehousing program with ICM's rental assistance program.

Most of the non-profit and for profit agencies that assist persons in need of mental health services and social services, as well as the public schools, are located along Main Street. The City is working to construct or reconstruct sidewalks along Main Street to make pedestrian mobility possible to and from the facilities. CDBG funds will be used to fund a portion of this Safe Routes to Schools project, a collaborative project with Texas Department of Transportation, Clear Creek ISD, and the City of League City.

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

During PY 2021, the City developed a new 5-Year Consolidated Plan and Fair Housing Plan addressing the obstacles and impediments to Fair Housing and possible actions to address the issues in the future. Much research was done to identify public and private impediments and to determine potential remedies. As part of the development of the two plans, the City developed two surveys in English and Spanish – one for Community Development needs and one related to Fair Housing. The surveys, which

were advertised in the local paper and on the Municipal Access Channel, at City Hall and at public hearings, were on-line and available in paper format. There were 114 responses to the Community Development survey and 35 responses to the Fair Housing survey. All of the responses were analyzed for use in developing both the Consolidated Plan and Fair Housing Plan. League City continues to maintain a Fair Housing Officer to address questions and potential concerns regarding fair housing as well as to investigate complaints and steer inquirers through the process of filing complaints with the State and HUD. No inquiries or complaints were received in PY 2021.

The greatest impediment to fair and equitable housing is lack of sufficient resources. The City's Economic Development Council works to encourage small businesses and to bring in large corporations that can employ unskilled and skilled labor. The health care industry in League City is growing dramatically with regional hospitals and medical care. These are employing individuals who were unemployed or underemployed. All City construction projects seek Section 3 businesses and the City assists individuals to become registered as a Section 3 business or individual. Additionally, the CDBG-funded construction projects traditionally are completed by firms that pay significantly higher hourly wages than the Davis Bacon Wage Rates require. The CDBG funding to CIS-BA allowed the agency to provide more assistance to children and youth to reduce drop out rates and enhance grades and graduation rates. While not immediate solutions to poverty and limitations on housing choice, in the long term the successful beneficiaries will be able to access jobs at livable wages and live in sound, affordable dwellings.

CR-40 - Monitoring 91.220 and 91.230

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

A major component of the monitoring process is the review of all documents submitted with each monthly reimbursement request. These documents include all financial supporting documentation as well as client information and agency staffing information. Each document is carefully reviewed and any concerns or questions are directed to the submitting agency. No funds are reimbursed until all documentation is in order and approved by the City's CDBG consultant, Assistant Director of Planning, and Finance Department. During the year, if any concerns arise regarding beneficiaries, finances, or staffing, the City will contact the agency and provide technical assistance to improve their documentation and reporting. The City is always available to answer questions and assist subrecipients in ferreting out and understanding Federal regulations and policies. All new subrecipients receive CDBG training and assistance in completing the first few reimbursement requests.

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

For construction contracts, the City monitors the weekly certified payrolls for each contractor and its subcontractors, conducts employee interviews of at least one employee per job description, and monitors the job site for proper EEOC postings and federal-funding signage as well as work quality. The Project Management Department monitors the projects on a regular basis for contract compliance, work quality, progress, and safety. The City encourages the hiring of Section 3 employees and to assist employees who are Section 3 eligible to become certified. Approximately 90% of the construction workers hired by the prime contractors on CDBG-funded projects are Section 3-eligible, based on incomes provided by the contractor at time of hire. However, very few were or soon became registered Section 3 individuals. No Section 3 businesses that are qualified to do the construction work required have submitted bids. When a selected contractor plans to hire subcontractors, the City encourages them to seek out Section 3 businesses. The City provides the contractor with information on Section 3 and the possibility of becoming registered given the percentage of employees who were eligible at time of hire.

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

League City reviews its Citizen Participation Plan annually to adjust for any changes in the planning process and in the state of the community, such as occurred with COVID-19 when meetings and hearings were forced to become virtual.

All notice of all public hearings and document drafts are posted on the City's website. Notices are also posted in the Galveston Sun, the county's general circulation newspaper and at City Hall. All notices are in English and Spanish.

The City held two public hearings for the PY 2021 Annual Action Plan during PY 2020. Due to the relaxed rules dealing with COVID-19, the City was able to resume in-person hearings and conducted them at the Community Center located next to City Hall in a CDBG Target Area. The public hearings complied with the Citizen Participation Plan and HUD regulations by providing 72 hours public notice in the local daily newspaper, on the City website, and posted at City Hall. Interested parties also had the opportunity to speak at city council meetings, especially the one during which the Action Plan was approved. The public comment period for the PY 2021 Annual Action Plan was 30 days.

The City posted notices in English and Spanish on the City's website, in the general circulation newspaper and at City Hall soliciting public comment for the PY 2021 CAPER. Comments were accepted from publication date December 5, 2022 through December 23, 2022. The newspaper affidavit of publication is in the attachments. The draft CAPER was also posted on the City's website for review.

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

The City posted notices in English and Spanish on the City's website, in the general circulation newspaper and at City Hall soliciting public comment for the PY 2021 CAPER. Comments were accepted from publication date December 5, 2022 through December 23, 2022, giving 18 days to respond. The newspaper affidavit of publication is in the attachments. The draft CAPER was also posted on the City's website for review. Interested parties could read on-line or download the draft CAPER or request a copy through the Planning Department. All comments to the plans and CAPERs are reviewed and if relevant, considered. For comments or questions that are not relevant to the CDBG program but should be considered by the City are directed to the appropriate department or elected official.

CR-45 - CDBG 91.520(c)

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

The new 5-Year Consolidated Plan took effect October 1, 2022. Generally, the program objectives have remained the same – utilizing the allowed 15% of the annual award for public services, keeping the administrative funding at between 10% and 12%, and using the remainder of the funds for infrastructure projects. During PY 2021, staff decided to no longer use CDBG funds for the design and engineering elements of construction projects, only for the actual labor. This is to ensure that only projects for which design and engineering are near completion or completed will be funded, thus being able to complete the construction in due course to meet timeliness requirements.

The staff continues to improve compliance with Section 3 requirements and to ensure accurate reporting by contractors.

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

No

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

CR-58 – Section 3

Identify the number of individuals assisted and the types of assistance provided

Total Labor Hours	CDBG	HOME	ESG	HOPWA	HTF
Total Number of Activities	1	0	0	0	0
Total Labor Hours	2936				
Total Section 3 Worker Hours	2936				
Total Targeted Section 3 Worker Hours	824				

Table 8 – Total Labor Hours

Qualitative Efforts - Number of Activities by Program	CDBG	HOME	ESG	HOPWA	HTF
Outreach efforts to generate job applicants who are Public Housing Targeted Workers	0				
Outreach efforts to generate job applicants who are Other Funding Targeted Workers.	0				
Direct, on-the job training (including apprenticeships).	0				
Indirect training such as arranging for, contracting for, or paying tuition for, off-site training.	0				
Technical assistance to help Section 3 workers compete for jobs (e.g., resume assistance, coaching).	0				
Outreach efforts to identify and secure bids from Section 3 business concerns.	1				
Technical assistance to help Section 3 business concerns understand and bid on contracts.	1				
Division of contracts into smaller jobs to facilitate participation by Section 3 business concerns.	0				
Provided or connected residents with assistance in seeking employment including: drafting resumes, preparing for interviews, finding job opportunities, connecting residents to job placement services.	0				
Held one or more job fairs.	0				
Provided or connected residents with supportive services that can provide direct services or referrals.	0				
Provided or connected residents with supportive services that provide one or more of the following: work readiness health screenings, interview clothing, uniforms, test fees, transportation.	0				
Assisted residents with finding child care.	0				
Assisted residents to apply for, or attend community college or a four year educational institution.	0				
Assisted residents to apply for, or attend vocational/technical training.	0				
Assisted residents to obtain financial literacy training and/or coaching.	0				
Bonding assistance, guaranties, or other efforts to support viable bids from Section 3 business concerns.	0				
Provided or connected residents with training on computer use or online technologies.	0				
Promoting the use of a business registry designed to create opportunities for disadvantaged and small businesses.	1				
Outreach, engagement, or referrals with the state one-stop system, as designed in Section 121(e)(2) of the Workforce Innovation and Opportunity Act.	0				

Other.					
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Table 9 – Qualitative Efforts - Number of Activities by Program

Narrative

The 3rd Street reconstruction project conducted in PY 2020 and PY 2021 was the only Section 3 related activity. Lucas Construction was the chosen firm, in part due to its knowledge of Section 3 and its rules as well as having actively solicited Section 3-eligible employees and offering all employees assistance in applying to become Section 3 Certified.

The nearest public housing authorities are in Texas City, approximately 18 miles from League City and Galveston, 25 miles away. Without public transportation, residents would be unable to reach the job site.

There are no non-profit organizations in League City or within the surrounding area that provide job training, literacy education, apprenticeships, financial literacy or other readiness programs. The nearest state Workforce Solutions offices are in Houston 10 miles from League City, Texas City 13 miles from League City, and Baytown 23 miles from League City. There are no labor unions within approximately 25 miles serving the types of infrastructure construction projects conducted with public funds.

For the infrastructure construction projects, League City considers Targeted Workers as those living in League City or in adjacent Dickinson. This covers the area closest to the project sites where the relevant labor force is likely to live based on employee addresses on certified payrolls for multiple infrastructure contractors.