



2020 – 2024 Consolidated Plan

2020 Annual Action Plan

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A 5-Year Strategy for the City of New Braunfels, Texas, prepared in
accordance with the U.S. Department of Housing & Urban
Development's Consolidate Plan Requirements

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Executive Summary

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

1. Introduction

The Consolidated Plan for the City of New Braunfels, Texas, has been prepared in response to a planning process developed by the U.S. Department of Housing and Urban Development (HUD) for the Community Development Block Grant (CDBG) program. The City of New Braunfels 2020-2024 Consolidated Plan serves as the planning document meeting the federal statutory requirements in 24 CFR 91.200-91.230 guiding the use of CDBG funding based on the priorities set forth in the Consolidated Plan.

The major sections of the Consolidated Plan include a Needs Assessment, Market Analysis, five year Strategic Plan, a one year Action Plan, and Consultation and Citizen Participation, with accompanying documentation relating to public comment. The Strategic Plan addresses specific needs that were identified in the data analysis, with specific goals and program targets for each category designated for funding. The Action Plan is a subset of the Strategic Plan, addressing funding options for the next HUD Program Year. The Consolidated Plan can be used by organizations in the community as a guide for identifying activities through which they can help the City reach their housing and community development goals. The Consolidated Plan also serves as the baseline for measuring program effectiveness, as reported in the Consolidated Annual Performance and Evaluation Report (CAPER) required by HUD for each Program Year's funding allocation. Incorporated into the Consolidated Plan are an analysis of the local housing market and a review of housing and homeless needs in New Braunfels as a means of defining the current environment in which federal funding is being used. The Consolidated Plan provides a strategic plan for meeting priority needs that were identified through the community participation process. The analytical parts of the document draw from Census Data and the 2018 American Community Survey and other data provided by HUD. Other data sources include a resident survey that was used to assist in prioritizing needs as well as a Stakeholders meeting, a public hearing on community needs/priorities and a public hearing on the draft Plan. The survey was available on the City's website in English and Spanish. Paper copies were available upon request.

This Consolidated Plan outlines housing, community and economic development needs, priorities, strategies, and projects that will be undertaken by the City of New Braunfels with the funds that the City receives from the U.S. Department of Housing and Urban Development (HUD). As an entitlement jurisdiction, the City receives an annual share of federal Community Development Block Grant (CDBG) funds. In order to receive its CDBG entitlement, the City must submit this Consolidated Plan and First Year Annual Action Plan to HUD. The funds are intended to provide low- and moderate-income persons/households with viable communities, including decent housing, a suitable living environment, and expanded economic opportunities. Eligible activities include public facilities and improvements, housing activities, public services, economic development, planning, and program administration.

2. Summary of the objectives and outcomes identified in the Plan Needs Assessment Overview

The information provided in the Needs Assessment was analyzed to provide a picture of the City's needs related to affordable housing, special needs housing, non-housing community development, and homelessness. The needs assessment information, in conjunction with information gathered through consultations, the public participation process and needs identified in the City's previous Consolidated Plan formed the basis for the Strategic Plan and the programs and projects to be administered in the Annual Action Plan.

The objectives include:

- Continue to Plan, Monitor, and Administer Entitlement Grant Programs and insure compliance with Federal Regulations
- Improve the condition and availability of affordable housing stock
- Improve living conditions in New Braunfels by addressing non-housing community development needs
- Enhance the economic well-being of all citizens by addressing non-housing community development for special needs populations and low and moderate income persons

Identified High Priority Needs:

Housing: The housing needs in New Braunfels are the development of affordable housing (ownership and rental); housing repairs for low-moderate income homeowners including accessibility improvements to allow older homeowners the ability to "age in place"; assisting first time home buyers with down payment and closing cost assistance; expansion of affordable rental units for low-income renters through development of new multi-family properties; the expansion of the Housing Choice Voucher program; and increased landlord participation in the Housing Choice Voucher program.

During the next five years, New Braunfels will continue to support programs that provide minor home repairs for low-moderate income homeowners, programs that assist first-time home buyers and explore opportunities to increase affordable housing in the City.

Homelessness: The greatest homeless needs include emergency shelter, supportive services, transitional housing and rapid-rehousing programs and permanent supportive housing especially for special needs persons and the chronically homeless.

During the next five years, New Braunfels will continue to support and participate in the Comal County Homeless Coalition's planning process and the Continuum of Care in an effort to expand homeless services and shelter/housing. The City will support the agencies providing emergency shelter and other housing programs, as well as support other social service agencies providing services to those experiencing homelessness when funds are available and projects are financially feasible.

Public Facilities: Non-Housing Community Development: The need for funding to improve or develop public facilities both City-owned and privately owned was identified in the Needs Analysis. These projects would include but are not limited to community centers, parks and emergency shelters.

During the next five years, the City will provide the opportunity for a competitive grant process or a City Council directed process to fund eligible public facility projects. City staff and the Community Development Advisory Committee will evaluate the need, capacity, financial feasibility and available funds to determine project eligibility and submit funding recommendations to the City Council for approval.

Public Services: The need for continued and increased supportive services for low-moderate income persons including elderly services, special needs populations such as those with mental illness, HIV/AIDS, substance use disorders; emergency housing assistance programs; transportation assistance and food assistance is clearly identified in the Needs Analysis and expressed in meetings with stakeholders.

During the next five years, the City will continue to provide a competitive grant process or a City Council directed process to fund eligible supportive service activities and agencies. City staff and the Community Development Advisory Committee will evaluate the need, capacity and available funds to determine priority services to fund and submit funding recommendations to the City Council for approval.

Administration: During the next five years, the City continue to plan, monitor, and administer the HUD Entitlement Grant Programs and Fair Housing programs to insure compliance with Federal Regulations.

Identified Lower Priority Needs

The Needs Analysis identified Economic Development, Infrastructure Improvements, and Demolition activities as lower priority needs. The City will continue to evaluate these needs and potential projects during the next five years.

3. Evaluation of past performance

CDBG

The City of New Braunfels recognizes the importance of maintaining appropriate performance measurements of its CDBG projects and program. Staff provides management for the CDBG program and monitors activities and projects with developed guidelines that include performance measures to ensure regulatory compliance. The Consolidated Plan and Annual Action Plan also serve as the baseline for measuring program effectiveness, as reported in the Consolidated Annual Performance and Evaluation Report (CAPER) required by HUD for each Program Year funding allocation.

All projects included in the PY20 Annual Action Plan and projects funded during the past five years have met a High Priority Need as identified in the City's Consolidated Plans. The City has complied with the current Citizen Participation Plan. An updated Citizen's Participation Plan has been developed during the Consolidated Planning process.

The City continues to affirmatively further Fair Housing in a variety of ways. During the Consolidated Planning process, the City updated the Fair Housing Plan which had been rewritten in 2017 to incorporate new requirements and updated information. A survey, public hearings and a stakeholder meeting were

used to solicit input on fair housing issues from city residents. The City was limited in the number of face-to-face meetings that could be held due to COVID-19 restrictions. Fair housing information is presented and discussed at all CDBG meetings and also during monitoring with subrecipients. The City maintains Fair Housing information on their website and has a Fair Housing officer on staff. There were no Fair Housing complaints filed with the City during PY18 and PY19.

Efforts were made to retain affordable housing stock by funding the Comal County Senior Foundation's minor home repair program which addresses issues of deferred maintenance and accessibility for low-income elderly and/or disabled homeowners. During PY19, the City funded a new program for Comal County Habitat for Humanity which provides weatherization and aging in place repairs to income eligible homeowners. In order to increase homeownership opportunities for low to moderate income first-time homebuyers, the City funded Comal County Habitat for Humanity Homebuyer Program. During PY20, CDBG funds will once again be used to fund these three projects adding down payment assistance to Habitat's Homebuyer program.

The City allocated 15% of the PY 19 CDBG grant to social service agencies that provide services to low-moderate income residents of New Braunfels. These funds were used to provide emergency rent and utility assistance, services for abused and neglected children, emergency food assistance, and assistance to the homeless population, emergency shelter for victims of domestic violence, homeless prevention activities and the Meals on Wheels program.

The City allocated funding for public facilities during the PY19. Funds were used for improvements indoor and outdoor lighting and to replace the deteriorated roof of the Westside Community Center. Westside Community Center is located in a low-moderate income census tract and provides recreational and educational programs for neighborhood residents. Activities are available for children, youth, adults and seniors. A branch library is also located at the Westside Community Center.

CDBG-CV

On April 2nd, the City of New Braunfels received notification of a special allocation from the U.S. Department of Housing and Urban Development's Community Development Block Grant (CDBG) funds that was used to prevent, prepare for, and respond to the coronavirus (COVID-19). This allocation was authorized by the Coronavirus Aid, Relief, and Economic Security Act (CARES Act), Public Law 116-136 to respond to the growing effects of this historic public health crisis.

The CARES Act provided \$243,102 in Community Development Block Grant Coronavirus (CDBG-CV) funds to the City. CDBG-CV funds were allocated through a competitive process to agencies for activities that support the unique needs of low- and moderate-income persons who have been affected by COVID-19. Additionally, unallocated funds from PY19 in the amount of \$68,923 were used to support CDBG-CV projects for a total of \$312,025 available CDBG-CV projects. Projects funded were:

- CASA of Central Texas – \$55,600
- Comal County Crisis Center - \$10,000

- Comal County Habitat for Humanity - \$136,425
- Family Life Center - \$10,000
- San Antonio Food Bank - \$100,000

4. Summary of citizen participation process and consultation process

Due to COVID-19 restrictions, the City was unable to hold as many neighborhood meetings and focus groups as in previous years. In an attempt to solicit as much information as possible given the circumstances, multiple notices and emails were sent out asking all residents to complete an on-line survey. The survey link was listed on the City's website and there were English and Spanish versions.

In addition to holding a Stakeholders Meeting on March 4, 2020 and a Public Hearing on June 16, 2020, the Consolidated Planning team contacted a number of local, regional and state stakeholders for their knowledge of needs and resources in New Braunfels and identification of reports and data that would quantify and document need. Due to the COVID-19 stay-at-home orders, it has been extremely difficult to reach many of the stakeholders, but those for whom office voice mail and email boxes were not full, messages were left and questionnaires emailed. A number of the stakeholders responded to the inquiries. For those who were unreachable, annual reports and other documents from their organizations were used to determine the official position on need and resources.

Once restrictions were lifted, the City held a public meeting at City Hall on June 16, 2020 to solicit input on the needs and priorities for low-moderate income residents and low-moderate income areas. Notices were emailed, distributed to City departments, placed on the City's website and in the local newspaper in an effort to solicit as much input and attendance as possible. The meeting was also available on ZOOM for those not wanting to attend in person.

The draft Plan was made available to the public for review on June 22, 2020. The 30-day comment period was from June 22, 2020 through July 22, 2020. The Consolidated Plan and Fair Housing Plan were available on the City's website and at City Hall and the Main Library. A public hearing on the draft Plans was held on July 13, 3030 at the regularly scheduled City Council meeting. Due to public safety and health concerns, this meeting was conducted on ZOOM.

5. Summary of public comments

A summary of the comments received can be found in section PR-15. The Citizen Comments attachment provides a more detailed description of the comments received.

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

The City accepted all comments submitted and no comments related to the development of the Consolidated Plan, Annual Action Plan, Fair Housing Plan and Citizen Participation Plan were excluded.

7. Summary

The City of New Braunfels has been an entitlement community for the CDBG grant program since 1994. The City has utilized the CDBG funds to improve the quality of life, housing and neighborhoods for its low-moderate income residents.

During PY20, the first year of the new Consolidated Plan, the City's CDBG program will fund the following projects:

PY20 CDBG Projects

- Program Administration - \$82,650.20

Public Services

- CASA – Court Advocacy - \$10,000
- Comal County Senior Center – Meals on Wheels - \$12,000
- Family Life Center – Emergency Rent & Utility Assistance - \$10,000
- Holistic Empowerment Resources– Services People Affected by HIV/AIDS - \$5,200
- River City Advocacy – Counseling Program - \$9,787.65
- San Antonio Food Bank – Food Distribution - \$15,000

Affordable Housing

- Comal County Crisis Center – Transitional Housing Project-Phase 1 - \$36,000
- Comal County Habitat for Humanity – Down Payment & Closing Costs - \$11,500
- Comal County Habitat for Humanity – Housing Rehab Program - \$108,387.10
- Comal County Senior Center – Minor Home Repair Program - \$80,000
- HCS308, LLC – Prospera HCS – Exterior Repairs at Village Circle Apartments - \$75,038

The Process

PR-05 Lead & Responsible Agencies 24 CFR 91.200(b)

1. Describe agency/entity responsible for preparing the Consolidated Plan and those responsible for administration of each grant program and funding source

The following are the agencies/entities responsible for preparing the Consolidated Plan and those responsible for administration of each grant program and funding source.

Agency Role	Name	Department/Agency
Lead Agency	NEW BRAUNFELS	
CDBG Administrator	NEW BRAUNFELS	Finance Department
HOPWA Administrator		
HOME Administrator		
HOPWA-C Administrator		

Table 1 – Responsible Agencies

Narrative

The City of New Braunfels Finance Department is the lead administrative agency for the Consolidated Plan programs. This department provides fiscal and regulatory oversight of all CDBG programs and activities as well as other Federal and State grants for housing, economic and community development.

Consolidated Plan Public Contact Information

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PR-10 Consultation – 91.100, 91.110, 91.200(b), 91.300(b), 91.215(I) and 91.315(I)

1. Introduction

Due to the stay-at-home order because of COVID-19, it has been extremely difficult to reach many of the entities that are normally consulted in the Consolidated Planning process. Those for whom office voice mail and email boxes were not full, messages were left and questionnaires were emailed to all that were contacted. For those who were unreachable, annual reports and other documents from their organizations were used to determine the official position on needs and priorities.

Provide a concise summary of the jurisdiction’s activities to enhance coordination between public and assisted housing providers and private and governmental health, mental health and service agencies (91.215(I)).

Public outreach included multiple notices and emails that were sent out asking all residents to complete an on-line survey. The survey was available in English and Spanish. The City of New Braunfels has implemented actions to develop institutional structures and enhance coordination between city departments, housing providers and social service agencies, and foster assisted housing improvements and resident initiatives. Due to COVID-19 restrictions, in person meetings were restricted to a Stakeholders meeting on March 4, 2020 and a public hearing June 16, 2020. The purpose of these meetings was to solicit input on the needs and priorities of low-moderate income residents and in low-moderate areas of the City. Through public hearings and meetings held throughout the year, the City continues to utilize a network of contacts, referrals, and partnerships to implement the strategies outlined in the Five-Year Consolidated Plan and re-enforced in each Annual Action Plan. The City will continue to build its relationship with local housing/service providers and the Housing Authority to ensure that the current limited housing resources are utilized in the most efficient manner possible and to meet the housing needs of extremely low, very-low, and low-income renters and homeowners.

Additionally the City Council has appointed committees of New Braunfels residents and agencies can provide additional information on the needs of low-moderate income residents and advice on CDBG funding and activities. Two committees that provide input on CDBG activities are the Community Development Advisory Committee and the Workforce Housing Advisory Committee. The Community Development Advisory Committee is the committee responsible for reviewing applications for CDBG funding and making funding recommendations to City Council. Workforce Housing Advisory Committee provided information and data regarding housing needs in New Braunfels.

The City’s website provides public service and local government information including a section on the CDBG program. City Council meetings and other committee meetings are streamed on-line and archived. The Finance Department oversees the CDBG grant. The Grants Coordinator is responsible for the day-to-day operation of the program. The department works in conjunction with other Finance staff

and staff from Public Works, Westside Community Center, Economic Development, Police and Fire and Parks-Recreation Departments to oversee the development of the Consolidated Plan and administer the programs and activities incorporated in the Plan. CDBG staff also works with subrecipient non-profits exchanging information on gaps in services and trends of future needs.

Describe coordination with the Continuum of Care and efforts to address the needs of homeless persons (particularly chronically homeless individuals and families, families with children, veterans, and unaccompanied youth) and persons at risk of homelessness

The City of New Braunfels actively participates in the Comal County Homeless Coalition providing information on city programs, CDBG and other funding; participating in the Point-In-Time count; and has been instrumental in assisting with development of a cold weather shelter.

The City of New Braunfels' primary response to local homelessness has been through its participation in the Comal County Homeless Coalition. The Comal County Homeless Coalition is part of the Texas Balance of State Continuum of Care that is managed by the Texas Homeless Network. The local Comal County Homeless Coalition meets for planning and updates on homelessness in the city and county. The Texas Homeless Network provides data analysis from the Homeless Management Information System (HMIS), Point-In-Time Count (PIT), the Housing Inventory Count (HIC), and the Annual Homeless Assessment Report (AHAR) for planning and information purposes. This information is utilized to assist in determining the nature and extent of homelessness in New Braunfels and identifying potential projects that will eliminate gaps in housing and services. The Comal County Homeless Coalition holds monthly regular meetings to discuss and strategize on ways to meet the needs of those experiencing homelessness. The City's Grants Coordinator, Outreach Coordinator of Westside Community Center and representatives from the Police Department are active in the coalition.

The city does not currently have an emergency shelter or a variety of housing options such as transitional housing, Rapid Re-Housing program or permanent supportive housing. The New Braunfels police officers coordinate temporary shelter, such as the Cold Weather shelter and with local agencies for individuals and families experiencing homelessness, including individuals released from public institutions. The Coalition opened a Cold Weather shelter in 2018 and then again during the winter in 2019 – 2020 which was at capacity on most nights when it was open.

The City has funded an emergency rent and utility programs to subrecipients for the past five years and will fund a program for PY20. The CDBG funds are used to prevent eviction and the discontinuation of utilities that could result in homelessness for the household.

Additionally the City received a CDBG-CV grant to assist low-moderate income residents whose household income has been negatively affected by COVID-19. The City has awarded \$136,425 to Comal County Habitat for Humanity and \$10,000 to the Family Life Center for housing and utility assistance which helps to prevent homelessness due to eviction or utility disconnection; \$10,000 to the Comal County Crisis Center for emergency shelter and food for victims of domestic violence; \$100,000 to the Food Bank for

emergency food assistance and \$55,600 to CASA to provide advocacy and services to children who have been abused or neglected due to COVID-19 issues in the household.

Describe consultation with the Continuum(s) of Care that serves the jurisdiction's area in determining how to allocate ESG funds, develop performance standards and evaluate outcomes, and develop funding, policies and procedures for the administration of HMIS

The City does not receive Emergency Solutions Grant (ESG) funding.

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

Agencies, Groups, Organizations who Participated

1	Agency/Group/Organization	Holistic Empowerment Resources
	Agency/Group/Organization Type	Services-Persons with HIV/AIDS
	What section of the Plan was addressed by Consultation?	Non-Homeless Special Needs HOPWA Strategy
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Agency staff attended a stakeholders meeting where needs and priorities of services and clients was discussed. Agency also provided statistics and the needs of on New Braunfels residents living with HIV/AIDS. The anticipated outcome of understanding the needs and resources for this population was met providing information for the Strategic Plan and Annual Action Plan.
2	Agency/Group/Organization	SAN ANTONIO FOOD BANK
	Agency/Group/Organization Type	Services-Children Services-Elderly Persons Services-Persons with Disabilities Services-Persons with HIV/AIDS Services-homeless
	What section of the Plan was addressed by Consultation?	Non-Homeless Special Needs Anti-poverty Strategy
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Agency staff attended two stakeholders meetings where needs, gaps in services and priorities were discussed. Agency also provided information on the number and needs of New Braunfels residents that are experiencing food shortages. Staff also provide information on the increase need for food due to COVID-19. The anticipated outcome was met providing information for the Strategic Plan and Annual Action Plan.
3	Agency/Group/Organization	Connections Individual and Family Services, Inc.
	Agency/Group/Organization Type	Services - Housing Services-Children Services-homeless
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Homelessness Strategy Homelessness Needs - Unaccompanied youth

	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Agency was contacted and provided information their emergency shelter and transitional housing programs for homeless, children aging out of foster care and runaway youth. The anticipated outcome was met providing information and data for the Strategic Plan and Annual Action Plan.
4	Agency/Group/Organization	Comal County Senior Citizens Foundation
	Agency/Group/Organization Type	Services-Elderly Persons
	What section of the Plan was addressed by Consultation?	Non-Homeless Special Needs Anti-poverty Strategy
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Agency staff attended two stakeholders meetings to provide information about senior needs, nutrition, the senior center, in-home assistance, accessibility issues and their minor home repair program. Housing staff was also contacted directly to discuss the minor home repair program and the needs of elderly low-income homeowners. The anticipated outcome was met providing information for the Strategic Plan and Annual Action Plan.
5	Agency/Group/Organization	Comal County Habitat for Humanity
	Agency/Group/Organization Type	Housing
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Non-Homeless Special Needs Anti-poverty Strategy
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Agency staff attended a stakeholders meeting where housing issues were discussed. Agency also provided information on the number and needs of low-income homeowners and first-time homebuyers. The anticipated outcome was met providing information for the Strategic Plan and Annual Action Plan.
6	Agency/Group/Organization	Prospera Property Management
	Agency/Group/Organization Type	Housing Services - Housing

	What section of the Plan was addressed by Consultation?	Housing Need Assessment Non-Homeless Special Needs Market Analysis Anti-poverty Strategy
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Agency attended a stakeholder meeting and provided information on the needs of renters in subsidized housing and the rehabilitation needs of subsidized housing. The anticipated outcome for information was met.
7	Agency/Group/Organization	COMMUNITIES IN SCHOOLS OF SOUTH CENTRAL TEXAS
	Agency/Group/Organization Type	Services-Children Services-homeless Services-Education
	What section of the Plan was addressed by Consultation?	Homelessness Needs - Unaccompanied youth Non-Homeless Special Needs
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	City staff was not able to meet or talk directly with Communities in Schools staff due to COVID-19 restrictions. Information from the independent schools districts websites was used to identify the number and needs of low-income and homeless children in local schools. The anticipated outcome for information was met.
8	Agency/Group/Organization	CASA of Central Texas
	Agency/Group/Organization Type	Services-Children Services-Victims of Domestic Violence Services - Victims
	What section of the Plan was addressed by Consultation?	Non-Homeless Special Needs
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Agency attended a stakeholders meeting and provided information on the needs of abused and neglected children that are in custody of the Child Protection Services department, foster care and/or the court systems. Agency staff was contacted and provided additional data for the Strategic Plan and Annual Action Plan. The anticipated outcome for information was met.

9	Agency/Group/Organization	River City Advocacy
	Agency/Group/Organization Type	Services-Persons with Disabilities Services-Health
	What section of the Plan was addressed by Consultation?	Non-Homeless Special Needs
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Agency attended a stakeholder meeting providing information and statistics on the mental health needs of low-moderate income New Braunfels residents. The anticipated outcome for information for the Strategic Plan and Annual Action Plan was met.
10	Agency/Group/Organization	Family Life Center
	Agency/Group/Organization Type	Housing Services - Housing Services-homeless Services-Employment
	What section of the Plan was addressed by Consultation?	Homelessness Strategy Homeless Needs - Families with children Non-Homeless Special Needs
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Agency staff attended two stakeholder meetings and provided additional data on their emergency rent and utility assistance program as well as case management program. Information on the increased need for assistance due to COVID-19 was also provided. The anticipated outcome of information for the Strategic Plan and Annual Action Plan was met.
11	Agency/Group/Organization	Hill Country Mental Health/Mental Retardation Center
	Agency/Group/Organization Type	Services-Children Services-Persons with Disabilities Services-Health
	What section of the Plan was addressed by Consultation?	Non-Homeless Special Needs Anti-poverty Strategy

	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Consultation through stakeholders meetings and one-on-one conversations between staffs. The anticipated outcome of better understanding of mental health service and housing needs especially for veterans for the next five years was met.
12	Agency/Group/Organization	Family Promise of Greater New Braunfels
	Agency/Group/Organization Type	Housing Services - Housing Services-homeless
	What section of the Plan was addressed by Consultation?	Homelessness Strategy Homeless Needs - Families with children
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Agency staff attended a stakeholders meeting and provided information on the housing and service needs of homeless families. The anticipated outcome of information needed for developing the Strategic Plan and Annual Action Plan was met.
13	Agency/Group/Organization	McKenna Foundation
	Agency/Group/Organization Type	Planning organization Foundation
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Non-Homeless Special Needs Anti-poverty Strategy
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Consultation through stakeholders meetings and public hearing and one-on-one conversations; The anticipated outcome of better collaboration between a local community foundation and the City was met.
14	Agency/Group/Organization	Comal County Crisis Center
	Agency/Group/Organization Type	Housing Services-Children Services-Victims of Domestic Violence Services - Victims
	What section of the Plan was addressed by Consultation?	Homelessness Strategy Homeless Needs - Families with children

	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Agency staff attended a stakeholder meeting and provided information on the housing and service needs of those experiencing domestic violence and sexual assault. The anticipated outcome of information for the Strategic Plan and Annual Action Plan was met.
15	Agency/Group/Organization	Community Development Advisory Committee
	Agency/Group/Organization Type	Planning organization Citizen Committee
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Homelessness Strategy Non-Homeless Special Needs Anti-poverty Strategy
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	City Council appointed committee of nine New Braunfels residents. Monthly meetings between committee and City staff; reviews CDBG funding applications from subrecipients and makes recommendations to City Council. The anticipated outcome of providing funding recommendation to City Council for the Annual Action Plan was met.
16	Agency/Group/Organization	City of New Braunfels Police Department
	Agency/Group/Organization Type	Law Enforcement Grantee Department
	What section of the Plan was addressed by Consultation?	Homelessness Strategy Non-Homeless Special Needs
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Consultation meetings with the City's police officers to discuss issues and to further develop coordinated efforts between officers and local agencies for the temporary placement of people experiencing homelessness, including discharge planning.
17	Agency/Group/Organization	Comal County Health Department
	Agency/Group/Organization Type	Services-Health Other government - County
	What section of the Plan was addressed by Consultation?	Lead-based Paint Strategy Non-Homeless Special Needs

	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	The Health Department provided information through a telephone conversation and data reports. Primary purpose of having accurate data for the Strategic Plan and Annual Action Plan on the occurrences of lead-based paint hazards and cases was met.
18	Agency/Group/Organization	City of New Braunfels Economic Development Department
	Agency/Group/Organization Type	City Department Grantee Department
	What section of the Plan was addressed by Consultation?	Economic Development Market Analysis
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Department staff attended two stakeholder meetings. Staff also provided information for the Market Analysis section of the Consolidated Plan. The anticipated outcome of information for the Consolidated Plan was met.
19	Agency/Group/Organization	United Way of Comal County
	Agency/Group/Organization Type	Planning organization Non-profit agency
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Homelessness Strategy Non-Homeless Special Needs Anti-poverty Strategy
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Information was gathered from their website and from Comal County Needs Assessment report. The anticipated outcome of information for the Strategic Plan and Annual Action Plan was met.
20	Agency/Group/Organization	City of New Braunfels City Council
	Agency/Group/Organization Type	Elected City Council members and Mayor
	What section of the Plan was addressed by Consultation?	Goals and priorities for upcoming 5 years

	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Presentations by staff on the Consolidated Plan started in February and continued through July when City Council approved the Consolidated Plan, Annual Action Plan, Fair Housing Plan and the Citizens Participation Plan. The Council provided guidance in developing the goals in the 5-Year Strategic Plan and the Annual Action Plan. The anticipated outcome of having viable plans approved by City Council was met.
21	Agency/Group/Organization	Comal County Sheriff's Department
	Agency/Group/Organization Type	Other government - County
	What section of the Plan was addressed by Consultation?	Homelessness Strategy Homeless Needs - Chronically homeless Homelessness Needs - Veterans
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	The Sheriff's Department manages the county jail. Coalition members and Sheriff Department staff have and will continue to discuss discharge planning for newly released inmates. The City of New Braunfels does not operate a city jail.
22	Agency/Group/Organization	National Development Council
	Agency/Group/Organization Type	Housing Planning organization
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Economic Development Market Analysis
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Field Director provided information on NDC services to the City, including technical assistance and capacity-building, to the City. Information on the design, implementation and evaluation economic and housing development programs was provided. The anticipated outcome of information for the Market Analysis and Strategic Plan was met.
23	Agency/Group/Organization	Community Solutions TX
	Agency/Group/Organization Type	Housing Services - Housing Services-homeless Service-Fair Housing Consulting Firm

	What section of the Plan was addressed by Consultation?	Housing Need Assessment Lead-based Paint Strategy Public Housing Needs Homelessness Strategy Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Non-Homeless Special Needs Economic Development Market Analysis Anti-poverty Strategy
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Community Solutions TX provides consulting services to the City of New Braunfels in the development and management of CDBG program. The anticipated outcome of the development of Consolidated Plan, Strategic Plan, Fair Housing Plan, Annual Action Plan and updated Citizen Participation plan was met.
24	Agency/Group/Organization	Greater New Braunfels Economic Development Foundation
	Agency/Group/Organization Type	Planning organization Business and Civic Leaders Foundation
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Economic Development Market Analysis
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Agency provided the Workforce Housing Study that they had completed in 2018 and provided information on the market conditions and economic development activities underway or that are planned. The anticipated outcome of information on affordable housing and economic development needs was met.
25	Agency/Group/Organization	Comal County Probation
	Agency/Group/Organization Type	Other government - State
	What section of the Plan was addressed by Consultation?	Homelessness Strategy Anti-poverty Strategy

	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Agency staff provided information and data on the number of persons on adult and juvenile probation and the need for housing and services for these populations. The anticipated outcome of having current information for the development of the Strategic Plan and Annual Action Plan was met.
26	Agency/Group/Organization	Methodist Health of South Texas
	Agency/Group/Organization Type	Services-homeless Services-Health
	What section of the Plan was addressed by Consultation?	Homelessness Strategy Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	The agency provides a Wesley nurse in the New Braunfels area. She is active in the Comal County Homeless Coalition and provided medical services at the Cold Weather Shelter and well as information on the health needs of low-moderate income people. The anticipated outcome was met by providing information on health needs and discharge planning.
27	Agency/Group/Organization	Alamo Area Council of Governments
	Agency/Group/Organization Type	Other government - State Regional organization Planning organization
	What section of the Plan was addressed by Consultation?	Economic Development Market Analysis Emergency Management
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Regional planning agency providing information and access to funding for projects; collaboration with other governmental entities in the area. The anticipated outcome was met by providing information and data for the Consolidated Plan
28	Agency/Group/Organization	Texas Homeless Network
	Agency/Group/Organization Type	Housing Services - Housing Planning organization

What section of the Plan was addressed by Consultation?	Homelessness Strategy Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth
How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Agency staff was consulted via telephone to discuss the Balance of State CoC goals, and the PIT and HIC documents that they provided. The anticipated outcome of having accurate data and discussing the goals in the statewide CoC was met.

Table 2 – Agencies, groups, organizations who participated

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

The City of New Braunfels accepts all comments and includes them in them in an attachment to the Consolidated Plan and Annual Action Plan. All comments relative to the Consolidated Plan and Annual Action Plan are considered and discussed during the decision-making process. The 30 day comment period provided agencies and residents to make comments regarding the Consolidated Plan. Additionally information regarding the Plan and a survey In English and Spanish was on the City's website from March through the end of the comment period on July 22, 2020.

Comments not related to the CDBG programs or plans are accepted and responded to but not considered in developing priorities or making funding recommendations.

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

Name of Plan	Lead Organization	How do the goals of your Strategic Plan overlap with the goals of each plan?
Continuum of Care	Comal County Homeless Coalition	Using the Continuum of Care as a reference, the City has aligned the goals in the homeless section of the Strategic Plan and Annual Action Plan with the local Continuum of Care plan.
Comprehensive Plan	City of New Braunfels, TX	The long range plans in the Comprehensive Plan support the goals in the Strategic Plan by addressing affordable housing and activities that enhance the livability and desirability of New Braunfels

Name of Plan	Lead Organization	How do the goals of your Strategic Plan overlap with the goals of each plan?
New Braunfels Workforce Housing Study	New Braunfels Economic Development Corporation	Study identified issues that affect housing costs, viability of housing, new single and multi-family housing development, affordable housing and market trends which provides data when developing the Strategic Plan and affordable housing programs
Comal County Needs Assessment	United Way of Comal County	Provided information on identified needs, gaps in service and priorities which was used to develop the Strategic Plan
Community Needs Assessment	Community Council of South Central Texas, Inc.	Provided information on identified needs, gaps in service and priorities which was used to develop the Strategic Plan
State of Texas Balance of State Continuum of Care	Texas Homeless Network	Coordination of homeless services and housing programs with the lead agency for the Balance of State CoC goals; provided information from the Point in Time count and Housing Inventory Count.
American Community Survey	U.S. Census Bureau	Provided census data and a Narrative Profile of New Braunfels used in the Needs and Market sections of the Consolidated Plan
State of Texas Plan for Fair Housing Choice	Texas Department of Housing & Community Affairs	The goals outlined in the Fair Housing Plan were used to ensure that housing and fair housing goals in the Consolidated Plan and the Fair Housing Plan were consistent and overlapped with state goals.

Table 3 – Other local / regional / federal planning efforts

Describe cooperation and coordination with other public entities, including the State and any adjacent units of general local government, in the implementation of the Consolidated Plan (91.215(l))

Through the Alamo Area Council Governments, New Braunfels works in collaboration with other governmental entities. The City has an inter-local agreement with AACOG for curb to curb transportation services through Alamo Regional Transit.

Narrative (optional):

The City of New Braunfels has included agencies, residents and organizations in the development of the Consolidated Plan in order to develop a plan that truly reflects the needs and priorities of the City.

PR-15 Citizen Participation – 91.105, 91.115, 91.200(c) and 91.300(c)

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

Based on Citizens Participation Plan, outreach included a stakeholders meeting and public hearing, an on-line survey provided on the City of New Braunfels website, hard copies of the drafted plan at City Hall and the Main Library, and consultation with public and private agencies and organizations to capture public input as to the priority needs. Due to the COVID-19 virus, citizen participation could not be conducted in the usual way. The City held a Stakeholders meeting on March 4, 2020 before the Stay At Home orders which was attended by 19 representatives from non-profit and housing agencies. At the stakeholder meeting and public hearings, general issues related to the housing market, neighborhoods conditions, community development needs and concerns pertaining to barriers to affordable housing in New Braunfels were discussed. The format also included discussions of the communities' priority needs for the next five years and their priorities for funding for the next program year which were considered when developing goals.

The in-person meetings that were scheduled for the end of March, April and May had to be cancelled due to the social isolation and distancing requirements set by the State of Texas and the City of New Braunfels. However the City was able to obtain feedback and input via other methods such as email questionnaires, virtual meetings via ZOOM and telephone conversations with stakeholders.

A public hearing was held at City Hall on June 16, 2020 to allow comment on the needs and priorities for low-moderate income residents and low-moderate income areas and the funding recommendations for PY20. Notices were emailed, distributed to City departments, placed on the City's website and in the local newspaper in an effort to solicit as much input and attendance as possible.

The draft Plan was made available to the public for review on June 22, 2020. The 30-day comment period was from June 22, 2020 through July 22, 2020. The Consolidated Plan and Fair Housing Plan were available on the City's website and at City Hall and the Main Library. A public hearing on the draft Plans was held on July 13, 2020 at the regularly scheduled City Council meeting.

Citizen Participation Outreach

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
1	Public Meeting	Non-targeted/broad community Service & Housing Providers	19 representatives from non-profit service and housing agencies	Priorities included affordable housing; increased funding for non-profit agencies; need for homeless shelter, transitional housing and permanent supportive housing	All comments were accepted	
2	Internet Outreach	Non-targeted/broad community	78 surveys were received	Three highest needs identified were affordable housing, supportive services and transportation	All comments were accepted	
3	Newspaper Ad	Non-targeted/broad community	No responses were received.	Notice in English and Spanish in local newspaper and on City's website of the time, dates and locations of the public hearings	No comments were received for the public notice	

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
4	Public Meeting	Non-targeted/broad community Housing & Service Providers	Five in attendance representing non-profits, city staff, local foundation	Discussed the need for transportation; youth day center; homeless shelter	All comments were accepted.	
5	Public Meeting	Non-targeted/broad community	This was a virtual meeting; three comments were received via telephone	Comments included the need for more funding for public services and housing; city parks should not be funded since there are other resources available	All comments were accepted	

Table 4 – Citizen Participation Outreach

Needs Assessment

NA-05 Overview

Needs Assessment Overview

The American Community Survey data have shown that over time the magnitude of need has changed in New Braunfels. The pre-populated tables for this 2020 – 2024 Consolidated Plan shows that while the number of moderate-income (50-80% AMI) and above moderate-income (80-100% AMI) rental households with a housing problem declined by 40% and 20% respectively, the number of extremely low- and very low-income rental households rose significantly. The overall housing needs for owner occupied households did not change significantly between the two data sets except for the owners with incomes between 80% and 100% of the median income. However there has been an increase in the number with certain housing problems. Graph 1, attached in section NA-10 below, shows the changes in housing problems by tenure, income, and type of problem. The number with extreme cost burdens (>50% of income) rose substantially for renters with incomes at or below 50% of the Area Median Income (AMI) and for owners with incomes between 50% and 80% of the AMI. This is due in part to the shortage of units priced in an affordable range for those with incomes below the AMI, resulting in an affordability mismatch. Renters with incomes above 50% of AMI and owners with incomes above 80% of AMI are moving into lower cost units resulting in a loss of the number in those income ranges with a cost burden and forcing lower income renters and owners to move into units above affordability.

Of the housing problems recognized in the American Community Survey, cost burden is the primary one experienced in New Braunfels, followed by overcrowding. Based on Tables 9 and 10 in section NA-10 below, 3,130 (82.5%) low- to moderate-income renters and 1,675 (53.8%) low- to moderate-income owners have a housing cost burden to more than 30% of their income. Of those with a housing cost burden of more than 30%, 35.5% of low- to moderate-income renters and 42.4% of low- to moderate-income owners have cost burdens of more than 50% of their income. The greatest need is for housing for small households – small related households of two to three persons, and single person households. Seventy-five percent of the renters and 43% of the owners with a cost burden of more than 30% are individuals or in small related households. Elderly households comprise more than one-third of low- to moderate-income owners with a housing cost burden of more than 30%.

NA-10 Housing Needs Assessment - 24 CFR 91.205 (a,b,c)

Summary of Housing Needs

Three-fourths of the housing in New Braunfels is single-family and only 6.2% of the housing units are in multi-family developments of 20 units or more. As a result, rentals are higher than would occur in areas with a high percentage of large apartment complexes. In New Braunfels many renters are in single-family housing, and nearly half of all renters are in housing with three or more bedrooms, and 93.1% of owners have three or more bedrooms. The type of housing – single-family with three or more bedrooms - results in a shortage of both rental and sale units that are out of reach of a large portion of the population.

Demographics	Base Year: 2009	Most Recent Year: 2015	% Change
Population	57,740	64,075	11%
Households	18,374	22,360	22%
Median Income	\$55,929.00	\$59,721.00	7%

Table 5 - Housing Needs Assessment Demographics

Data Source: 2005-2009 ACS (Base Year), 2011-2015 ACS (Most Recent Year)

Number of Households Table

	0-30% HAMFI	>30-50% HAMFI	>50-80% HAMFI	>80-100% HAMFI	>100% HAMFI
Total Households	1,685	1,990	3,955	2,705	12,020
Small Family Households	465	775	1,305	1,410	6,675
Large Family Households	190	170	600	305	1,145
Household contains at least one person 62-74 years of age	305	420	880	515	2,230
Household contains at least one person age 75 or older	320	380	720	295	790
Households with one or more children 6 years old or younger	325	460	835	590	2,060

Table 6 - Total Households

Data Source: 2011-2015 CHAS

Housing Needs Summary Tables

1. Housing Problems (Households with one of the listed needs)

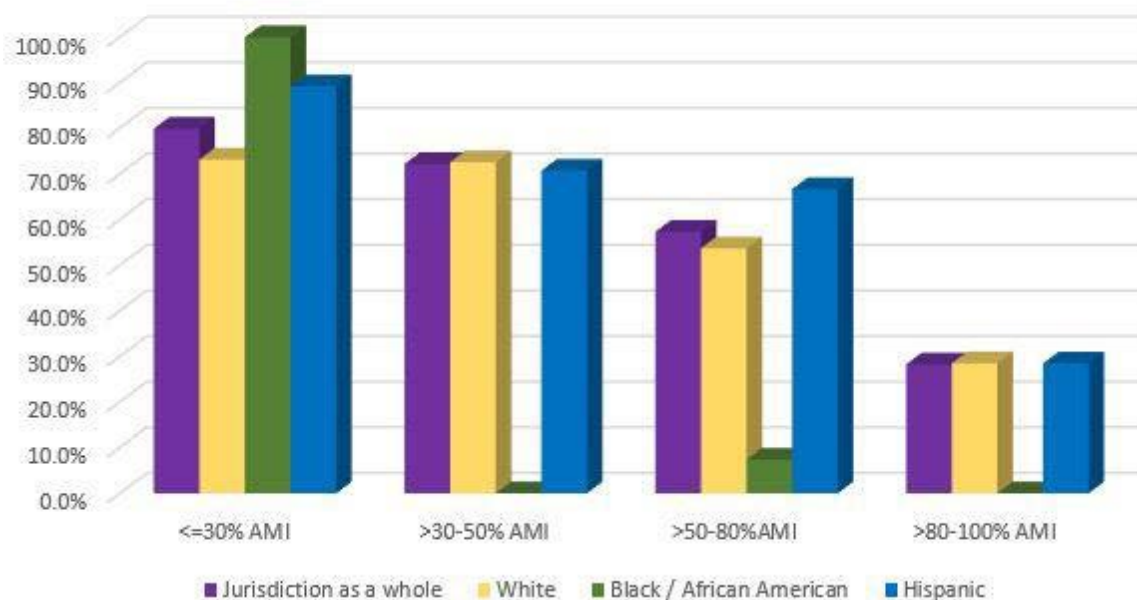
	Renter					Owner				
	0-30% AMI	>30- 50% AMI	>50- 80% AMI	>80- 100% AMI	Total	0-30% AMI	>30- 50% AMI	>50- 80% AMI	>80- 100% AMI	Total
NUMBER OF HOUSEHOLDS										
Substandard Housing - Lacking complete plumbing or kitchen facilities	50	45	70	55	220	40	10	0	4	54
Severely Overcrowded - With >1.51 people per room (and complete kitchen and plumbing)	25	0	10	0	35	0	0	15	4	19
Overcrowded - With 1.01-1.5 people per room (and none of the above problems)	125	40	120	20	305	10	30	125	4	169
Housing cost burden greater than 50% of income (and none of the above problems)	470	350	90	35	945	440	180	185	15	820

	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
Housing cost burden greater than 30% of income (and none of the above problems)	125	625	834	200	1,784	90	205	515	360	1,170
Zero/negative Income (and none of the above problems)	15	0	0	0	15	75	0	0	0	75

Table 7 – Housing Needs Summary

Data Source: 2011-2015 CHAS

Percent of Households with 1 or More Problems by Income & Race/Ethnicity



Graph 1 - Change in Households with Housing Problems by Type of Problem

2. Housing Problems 2 (Households with one or more Severe Housing Problems: Lacks kitchen or complete plumbing, severe overcrowding, severe cost burden)

	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
NUMBER OF HOUSEHOLDS										
Having 1 or more of four housing problems	665	435	290	110	1,500	495	220	325	35	1,075
Having none of four housing problems	234	760	1,595	1,095	3,684	200	570	1,750	1,475	3,995
Household has negative income, but none of the other housing problems	15	0	0	0	15	75	0	0	0	75

Table 8 – Housing Needs by Income Level

Data 2011-2015 CHAS
Source:

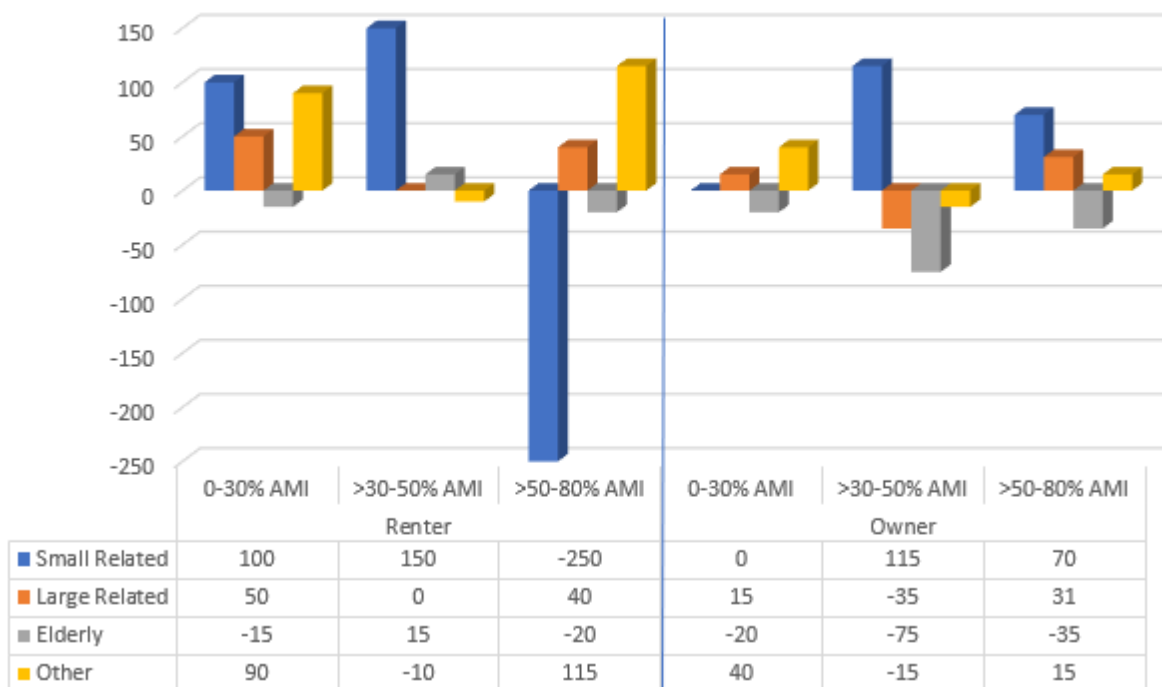
3. Cost Burden > 30%

	Renter				Owner			
	0-30% AMI	>30-50% AMI	>50-80% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	Total
NUMBER OF HOUSEHOLDS								
Small Related	259	515	350	1,124	160	145	350	655
Large Related	125	80	210	415	40	55	35	130
Elderly	155	205	205	565	225	160	220	605
Other	225	235	269	729	160	50	100	310
Total need by income	764	1,035	1,034	2,833	585	410	705	1,700

Table 9 – Cost Burden > 30%

Data 2011-2015 CHAS
Source:

Change in Households with Cost Burden of > 30% of Income based on Table 9



Graph 2 - Change in Number of Households with Housing Cost Burden > 30%

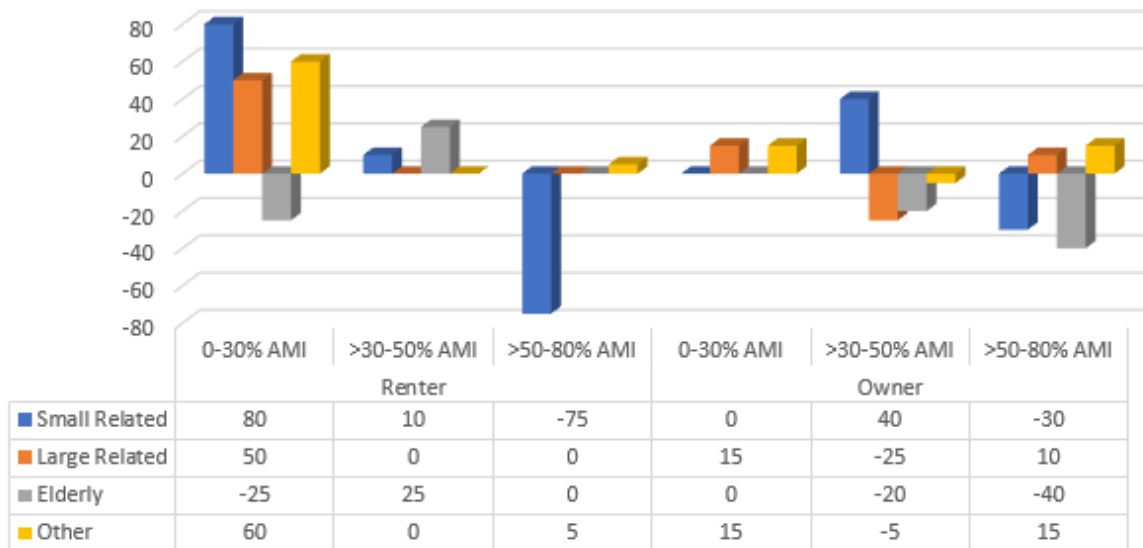
4. Cost Burden > 50%

	Renter				Owner			
	0-30% AMI	>30-50% AMI	>50-80% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	Total
NUMBER OF HOUSEHOLDS								
Small Related	255	150	30	435	140	65	60	265
Large Related	125	10	0	135	40	10	10	60
Elderly	100	100	35	235	185	75	85	345
Other	160	140	25	325	100	35	30	165
Total need by income	640	400	90	1,130	465	185	185	835

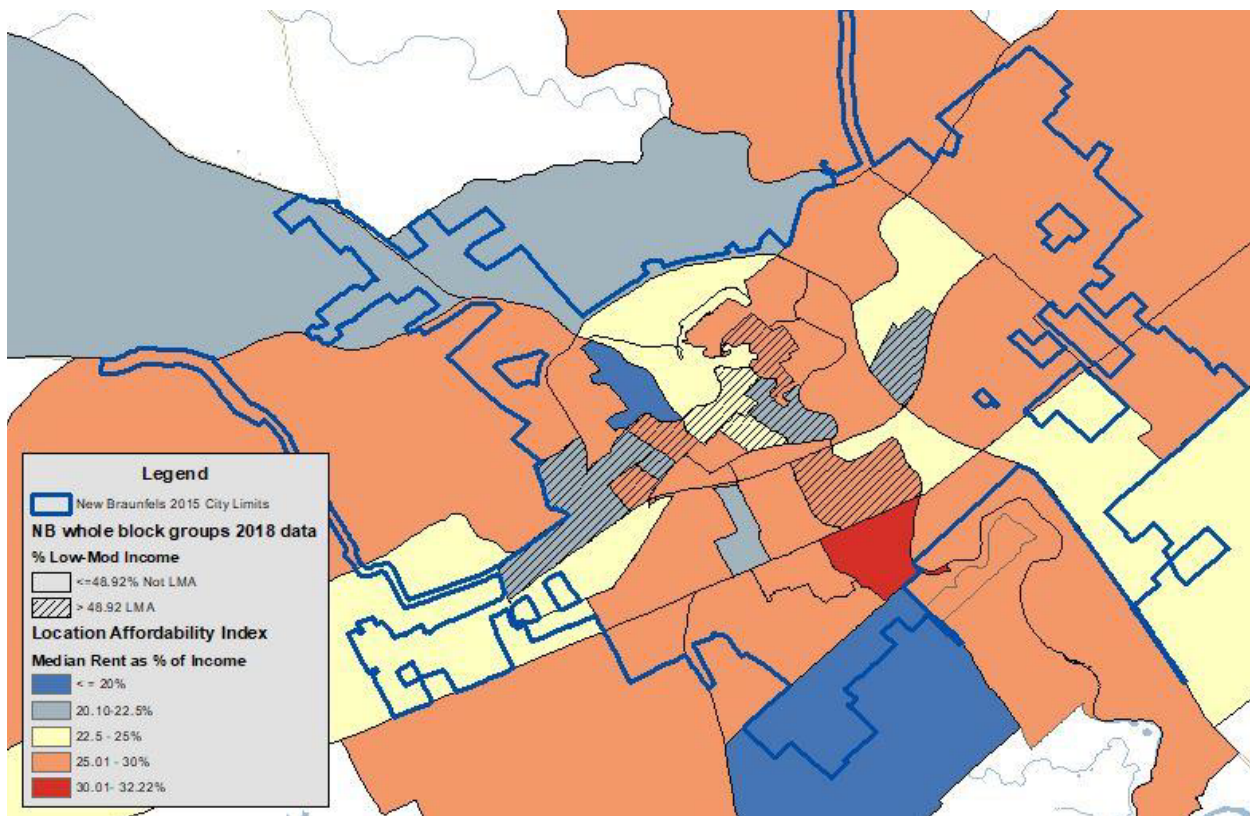
Table 10 – Cost Burden > 50%

Data 2011-2015 CHAS
Source:

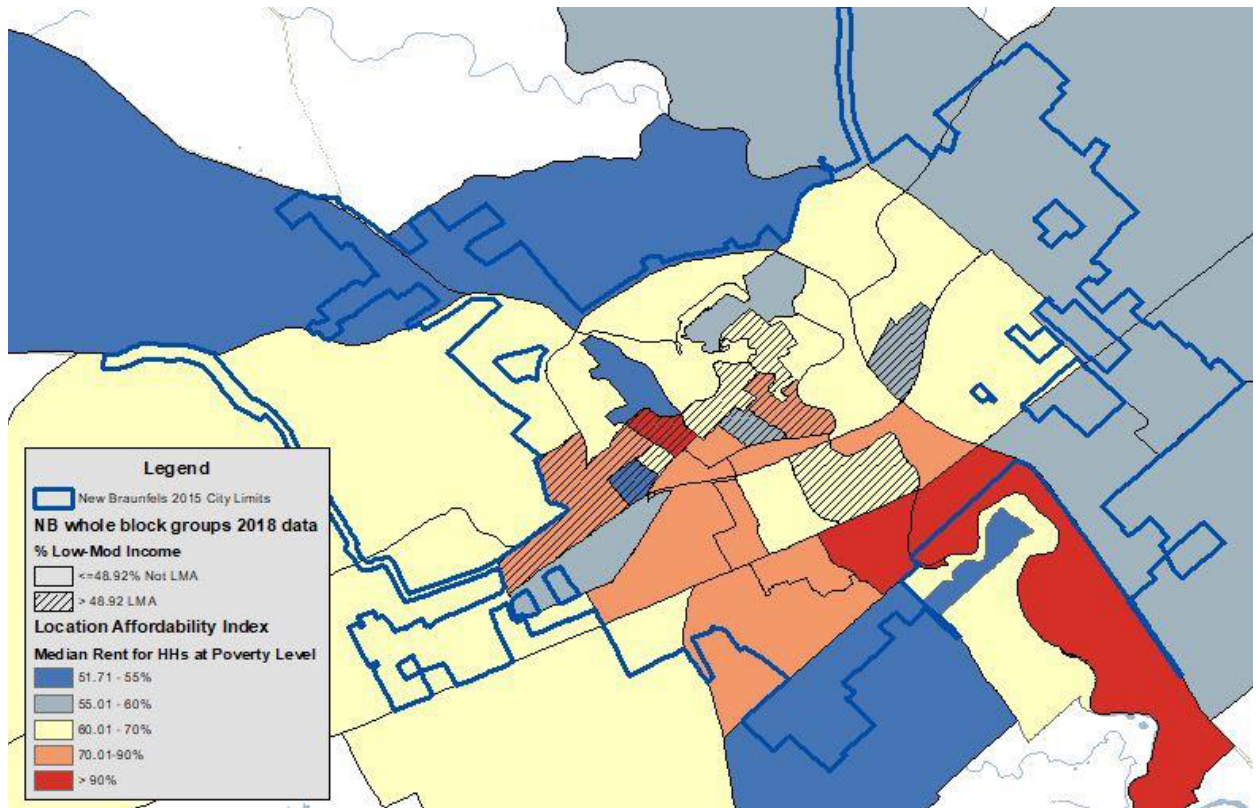
Change in Households with Cost Burden > 50% of Income based on Table 10



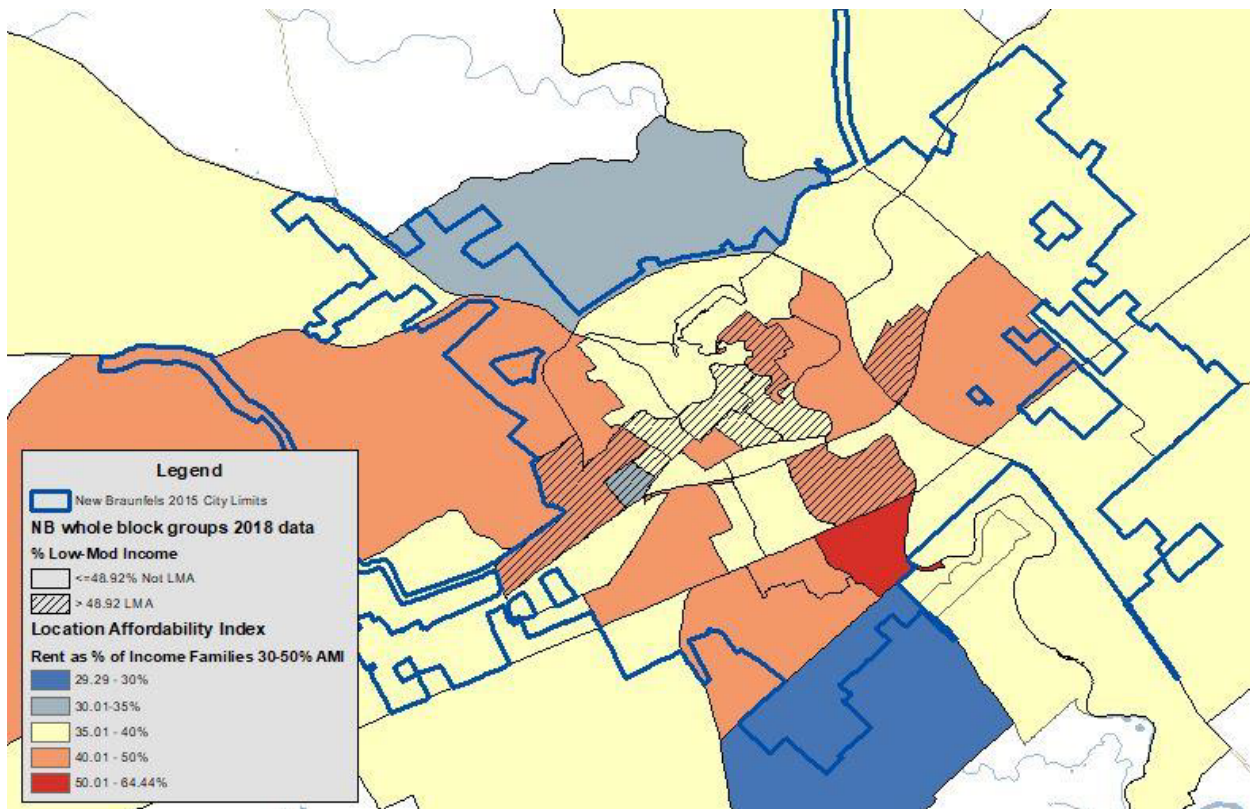
Graph 3 - Change in Number of Households with Cost Burden 31% - 50%



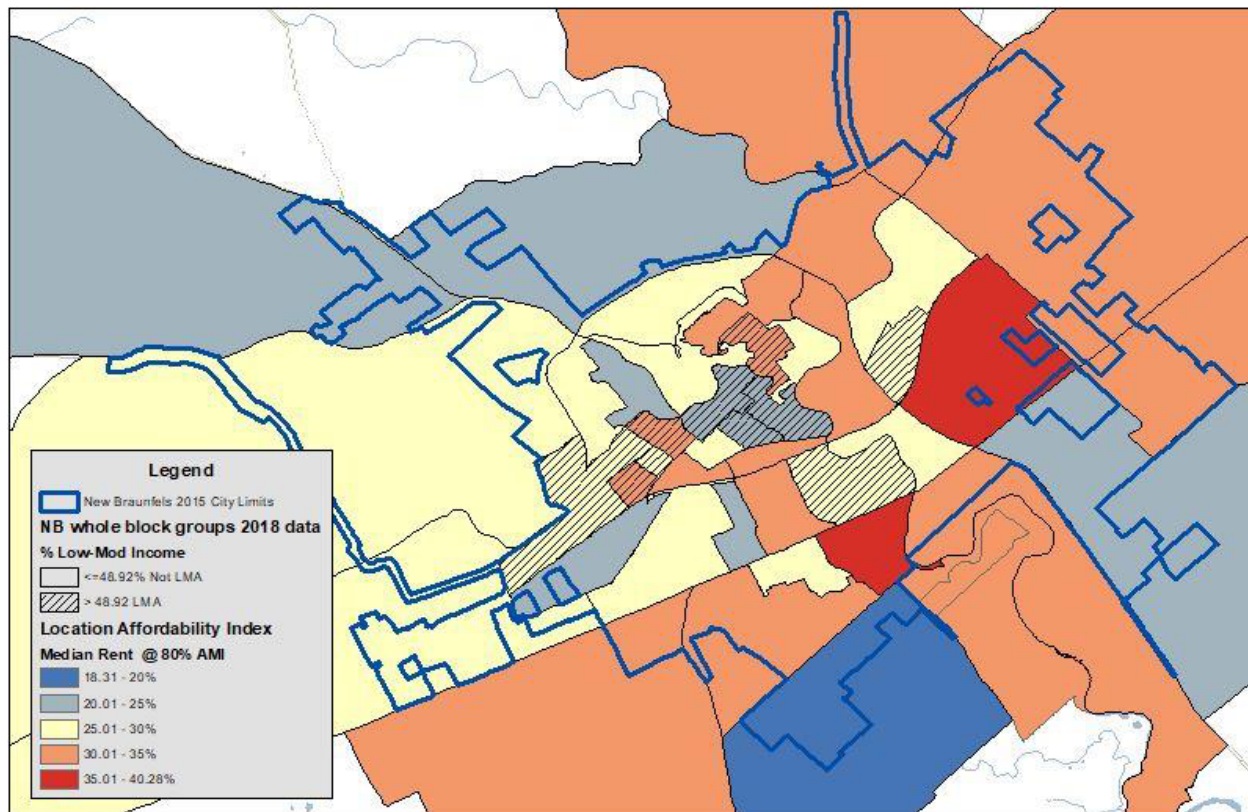
Map 1 - LAI 2017 Median Rent as % of Rental Households



Map 2 - LAI 2017 Median Rent as % of Income for Households at Poverty Level



Map 3 - LAI 2017 Median Rent as % of Income at 30%-50% AMI



Map 4 - LAI 2017 Median Rent as % of Income at 80% AMI

5. Crowding (More than one person per room)

	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
NUMBER OF HOUSEHOLDS										
Single family households	100	40	80	20	240	10	30	85	8	133
Multiple, unrelated family households	50	0	20	0	70	0	0	50	0	50
Other, non-family households	0	0	30	0	30	0	0	0	0	0
Total need by income	150	40	130	20	340	10	30	135	8	183

Table 11 – Crowding Information – 1/2

Data 2011-2015 CHAS
Source:

	Renter				Owner			
	0-30% AMI	>30-50% AMI	>50-80% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	Total
Households with Children Present	0	0	0	0	0	0	0	0

Table 12 – Crowding Information – 2/2

Data Source
Comments:

Describe the number and type of single person households in need of housing assistance.

Based on estimates from the 2016 CHAS data for the non-family households with housing problems and the ACS 2016 total for 1-person non-family households, it can be estimated that 1,989 (34.2%) of those single-person households have at least one of the four housing problems. Based on the small percent of households lacking complete plumbing or kitchen facilities, it can be assumed that virtually all of the 1,989 single person households have a cost burden of over 30% as their problem, making them in need of housing assistance. We estimate that of the 1,989 1-person households with at least one housing problem, 721 are owners and 1,484 are renters. Homeowners comprise approximately 62% of individuals 65 years of age and older households living alone and with housing problems.

The single-person owner occupied householders, especially the elderly, who have a housing cost burden, most likely also have issues with deferred maintenance on their homes leading to deterioration and a need for housing rehabilitation. Given the shortage of rental units for low- to moderate-income renters, the tenants are in need of more affordable housing options, either through Section 8 Housing Choice Vouchers or other subsidized units

Estimate the number and type of families in need of housing assistance who are disabled or victims of domestic violence, dating violence, sexual assault and stalking.

Based on the latest CHAS data, 6,310 households (27%) have at least one member with a disability. Of these 20.6% (1,298) are households with at least one housing problem. Approximately 2,795 households have a member with a self-care or independent living disability. Of these, 320 have an income of 30% AMI or less with at least one housing problem, putting them in need of housing assistance. Another 395 households with a member having a self-care or independent living disability have incomes of 30-50% AMI and at least one housing problem, putting them in need for better housing which may likely result in either absorbing a unit affordable to the extremely low, or placing them out of their affordability. In addition, 2,365 households have at least one member with a cognitive disability, including Alzheimer's or other dementia. No information is provided on the number who also have a self-care or independent living disability, resulting in the potential of double counting. It is estimated, based on ACS and CHAS data that at least 1,800 of the 3,120 self-care disability households and 1,500 of the cognitive disability households are single-person households and 600 self-care disabled and 500 cognitive disabled are elderly living alone. Again, there is likely to be a significant double counting. Living alone with a disability is not

considered as a “housing problem” in CHAS terms, but does put the householder at greater risk of requiring additional housing assistance in terms of better affordable accessible housing, caregivers, service animals and/or better safety measures. New Braunfels Police Department has a program to register the addresses of special needs households to ensure that the best tailored response is provided.

There are no municipal-level estimates on the number of households with a member who is a victim of domestic violence, dating violence, sexual assault, or stalking. Extrapolating from national numbers and looking at City of New Braunfels police statistics for 2018, it can be estimated that approximately 2,850 women and 815 men will be victims of intimate partner violence in any given year. However, trends are already showing a sharp increase in intimate partner violence in the United States due to the “stay-at-home” orders for the COVID-19 pandemic. The Statewide in 2019, 23% of domestic violence calls were from victims seeking shelter, with more than 30% being turned away due to a lack of beds. These figures translate into approximately 655 women and 187 men seeking shelter with 196 women and 62 men being turned away due to a lack of beds. No information is available to indicate the number of households affected by dating violence, non-partner sexual assault or stalking. New Braunfels reported 43 rapes in 2019, but no information on the number that were by intimate partners, nor how many sexual assaults occurred that did not include rape. No reliable information is available to indicate the number who will need housing assistance as a result of violence.

What are the most common housing problems?

The most common housing problem is a housing cost burden, followed by overcrowding. There is a shortage of housing at most price ranges resulting in an affordability mismatch. There are an insufficient number of quality housing units for the extremely low- and very low-income pushing some into housing that is above affordability. Additionally, there is a shortage of housing units affordable to the moderate-income pushing them upward into units above affordability or downward absorbing units that would be affordable to the very low-income. There is a shortage of Section 8 Housing Choice Vouchers that would make higher cost rentals affordable to the extremely low-income and very low-income.

Overcrowding results when households are forced to secure housing units with costs that exceed affordability.

Are any populations/household types more affected than others by these problems?

All low- to moderate-income populations and household types have a risk of living in overcrowded conditions and/or in housing above affordability. The elderly and small families are most affected by housing costs. The greatest increases in numbers of households with a housing cost burden are for extremely low- and very low-income renters and moderate-income homeowners. Overcrowding has increased since the reported figures in the 2015-2019 Consolidated Plan for extremely low- and very low-income renters and for owners with incomes between 50% and 100% of median. The number of substandard units has increased for extremely low- and moderate-income renters. The numbers have dropped for all of the housing problems for moderate-income renters. All of the data are American

Community Survey estimates based on an extremely small sample with the baseline counts only from 2000. The further from 2000, the higher the estimated margin of error and the higher the probable margin of error. As a result, when estimates from one sample to another vary by less than 100, much of the reported change could be due to sampling error.

Describe the characteristics and needs of Low-income individuals and families with children (especially extremely low-income) who are currently housed but are at imminent risk of either residing in shelters or becoming unsheltered 91.205(c)/91.305(c)). Also discuss the needs of formerly homeless families and individuals who are receiving rapid re-housing assistance and are nearing the termination of that assistance

Based on the latest HUD CHAS data, there are approximately 740 households that are in imminent risk of homelessness. These households are renters with one or more severe housing problems and are extremely low-income ($\leq 30\%$ of AMI). Of these households 40% are non-Hispanic white, 1% are African American, 56% are Hispanic, 3% are other/multi-race, and none are Asian, American Indian, or Pacific Islander. The first graph in the Graphic Attachments shows the disparity between whites and Hispanics.

The City of New Braunfels does not have any agencies providing Rapid Re-Housing programs.

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's definition of the at-risk households/population are those extremely low-income renters with at least one severe housing problem, including a housing cost burden of more than 50% of their income and/or with more than 1.5 persons per room. While lacking complete plumbing or kitchen facilities constitutes a housing problem, only 0.4% of housing units, and fewer households, do not have complete plumbing and only 1.1% do not have complete kitchens, and these include Single Room Occupancy units (SRO, also called Micro-efficiencies. While there is no ACS cross-tabulation information on heating fuel by household income, renter-occupied units with no safe source of heat, and for Texas summers, no documented air conditioning, are at risk of homelessness, particularly during extreme temperatures.

Specify particular housing characteristics that have been linked with instability and an increased risk of homelessness

Housing characteristics that have been linked with instability and an increased risk of homelessness include an extremely low household income coupled with a severe housing cost burden. Of these, renters have a greater instability and risk of homelessness than owners. In addition, the lack of any heating, and by extension, most likely any cooling, is indicative of the lack of sound housing for those extremely low-income renters. New Braunfels has an estimated 96 (1.1%) renters with no source of heat. All air

conditioning and 89.4% of heat sources for renters is electricity and with the high rate of electricity, the loss of utilities is a serious concern for the extremely low-income.

Several other housing characteristics, including age and type of unit, can be linked with housing instability, when coupled with income. New Braunfels Public Use Microdata Sample (PUMS) from the 2013-2017 ACS shows that none of the renter occupied households with incomes less than \$40,000 live in units built after 1989. Housing age, especially for rental housing, can play a big part in the quality of the unit, which can result in the need to vacate if the unit becomes substandard. Those renting mobile homes are particularly at risk of vacation as their lifespan is much shorter than bricks/mortar homes. The PUMS shows that, of the mobile home renters with incomes less than \$40,000 their units were built before 1970, making the mobile homes at least 50 years old.

Discussion

The most common housing problems in New Braunfels are cost burdens greater than 30% and overcrowding. The Public Use Microdata Sample (PUMS) is a compilation of the individual survey responses for 5% of the population and provided for within PUMAs (Public Use Microdata Areas) of 100,000 or more population. In essence, the files are the individual responses for the ACS surveys with no small area identifiers. As a result there is a sizable margin of error, but it allows researchers to cross-tabulate the variables in the ACS data files. The PUMS files from the 2013-2017 ACS indicate that 40% of renters in Comal and Guadalupe Counties, where New Braunfels, is located are paying more than 30% of their income for rent, with 18.7% of those having a cost burden of more than 50% of their income. Overcrowding, particularly for those already having a cost burden of more than 30%, puts the household at risk of homelessness. Of the renters represented by the PUMS data, more than 10% of those with a cost burden that exceeds 30% have overcrowded conditions.

NA-15 Disproportionately Greater Need: Housing Problems – 91.205 (b)(2)

Assess the need of any racial or ethnic group that has disproportionately greater need in comparison to the needs of that category of need as a whole.

Introduction

Overall, the housing need has increased in New Braunfels. Comparing the current pre-populated tables below with those in the prior Consolidated Plan, every race/ethnicity has seen an increase in households with a housing need. All of the extremely low-income African Americans and 90% of the Hispanics have at least one housing problem compared with 73% of extremely low-income white households. As incomes increase, the disparity narrows considerably. None of the very low-income and above moderate-income African Americans have housing problems. Very low-income and above moderate-income Hispanics mirror whites in the percent with problems. However, the percent of moderate-income Hispanics is 13 points higher than the percent for whites and nearly 10 points higher than all race/ethnicities combined. Any double-digit difference is considered significant.

0%-30% of Area Median Income

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	1,380	219	90
White	765	174	75
Black / African American	50	0	0
Asian	0	25	0
American Indian, Alaska Native	15	0	0
Pacific Islander	0	0	0
Hispanic	550	20	15

Table 13 - Disproportionally Greater Need 0% - 30% AMI

Data Source: 2011-2015 CHAS

*The four housing problems are:

1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than one person per room, 4. Cost Burden greater than 30%

30%-50% of Area Median Income

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	1,485	505	0
White	710	265	0
Black / African American	25	0	0
Asian	0	0	0
American Indian, Alaska Native	0	0	0
Pacific Islander	0	0	0
Hispanic	695	240	0

Table 14 - Disproportionally Greater Need 31% - 50% AMI

Data 2011-2015 CHAS
Source:

*The four housing problems are:

1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than one person per room, 4. Cost Burden greater than 30%

50%-80% of Area Median Income

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	1,964	1,995	0
White	1,379	1,345	0
Black / African American	40	80	0
Asian	30	0	0
American Indian, Alaska Native	0	0	0
Pacific Islander	0	0	0
Hispanic	515	550	0

Table 15 - Disproportionally Greater Need 51% - 80% AMI

Data 2011-2015 CHAS
Source:

*The four housing problems are:

1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than one person per room, 4. Cost Burden greater than 30%

80%-100% of Area Median Income

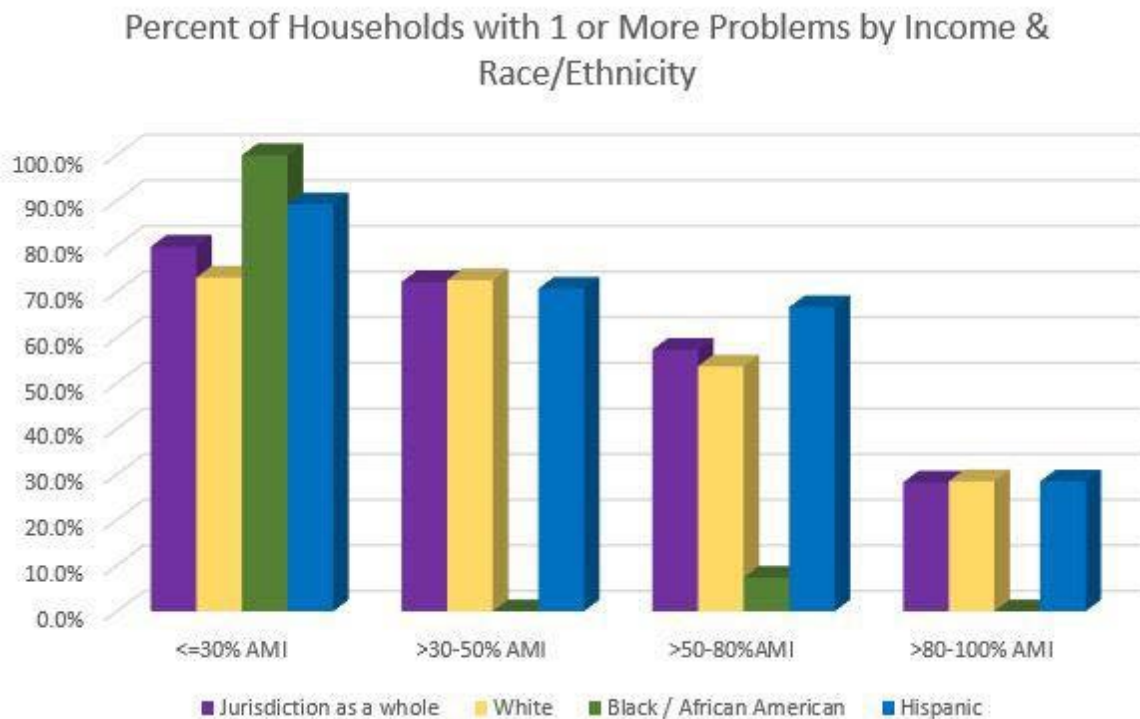
Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	705	2,010	0
White	455	1,300	0
Black / African American	30	25	0
Asian	0	25	0
American Indian, Alaska Native	0	0	0
Pacific Islander	0	0	0
Hispanic	200	660	0

Table 16 - Disproportionally Greater Need 81% - 100% AMI

Data 2011-2015 CHAS
Source:

*The four housing problems are:

1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than one person per room, 4. Cost Burden greater than 30%



Graph 4 - Disproportionally Greater Needs Summarized

Discussion

The Asian, American Indian, and Pacific Islander households in New Braunfels have no households accounted for in the American Community Survey sample that has been used for the pre-populated tables, therefore none are listed as having housing problems. African Americans comprise only 7% of the New Braunfels households and 2% of those with incomes less than median, but 20% of those less than median with problems. Hispanics comprise 18% of total households, yet 30% of those with incomes less than median, and 38% of those with incomes below median with problems. Non-Hispanic whites comprise 66% of total households and only 62% of those with incomes less than median. All other races comprise a total of 7% of households and 6% of those with incomes less than median. More than one third (38%) of the Hispanic households with incomes less than the median have housing problems, though only 18% of the total New Braunfels households are Hispanic.

NA-20 Disproportionately Greater Need: Severe Housing Problems – 91.205 (b)(2)

Assess the need of any racial or ethnic group that has disproportionately greater need in comparison to the needs of that category of need as a whole.

Introduction

HUD's distinction between housing problems and severe housing problems lies in the degree of housing cost burden and the level of overcrowding. Severe housing cost burdens are housing costs of more than 50% of the household income. Severe overcrowding is defined as more than 1.5 persons per room. The vast majority of units with severe housing problems are those with a severe cost burden. The level of severe housing problems is a direct function of the incomes. As incomes increase, the overall percent of housing with severe problems decreases, however the disproportion between Hispanics and other groups increases considerably. The HUD provided tables show the disproportion.

0%-30% of Area Median Income

Severe Housing Problems*	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	1,160	434	90
White	595	344	75
Black / African American	50	0	0
Asian	0	25	0
American Indian, Alaska Native	15	0	0
Pacific Islander	0	0	0
Hispanic	505	65	15

Table 17 – Severe Housing Problems 0% - 30% AMI

Data 2011-2015 CHAS
Source:

*The four severe housing problems are:

1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than 1.5 persons per room, 4. Cost Burden over 50%

30%-50% of Area Median Income

Severe Housing Problems*	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	655	1,330	0
White	425	555	0
Black / African American	0	25	0
Asian	0	0	0
American Indian, Alaska Native	0	0	0
Pacific Islander	0	0	0
Hispanic	230	710	0

Table 18 – Severe Housing Problems 31% - 50% AMI

Data 2011-2015 CHAS
Source:

*The four severe housing problems are:

1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than 1.5 persons per room, 4. Cost Burden over 50%

50%-80% of Area Median Income

Severe Housing Problems*	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	615	3,345	0
White	405	2,320	0
Black / African American	15	105	0
Asian	20	10	0
American Indian, Alaska Native	0	0	0
Pacific Islander	0	0	0
Hispanic	170	885	0

Table 19 – Severe Housing Problems 51% - 80% AMI

Data 2011-2015 CHAS
Source:

*The four severe housing problems are:

1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than 1.5 persons per room, 4. Cost Burden over 50%

80%-100% of Area Median Income

Severe Housing Problems*	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	145	2,570	0
White	65	1,690	0
Black / African American	0	55	0
Asian	0	25	0
American Indian, Alaska Native	0	0	0
Pacific Islander	0	0	0
Hispanic	60	805	0

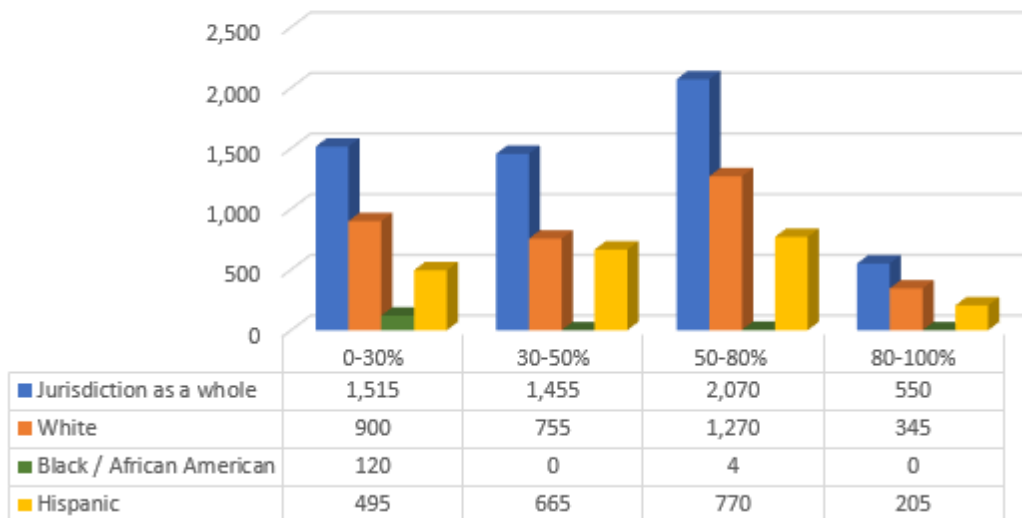
Table 20 – Severe Housing Problems 81% - 100% AMI

Data 2011-2015 CHAS
Source:

*The four severe housing problems are:

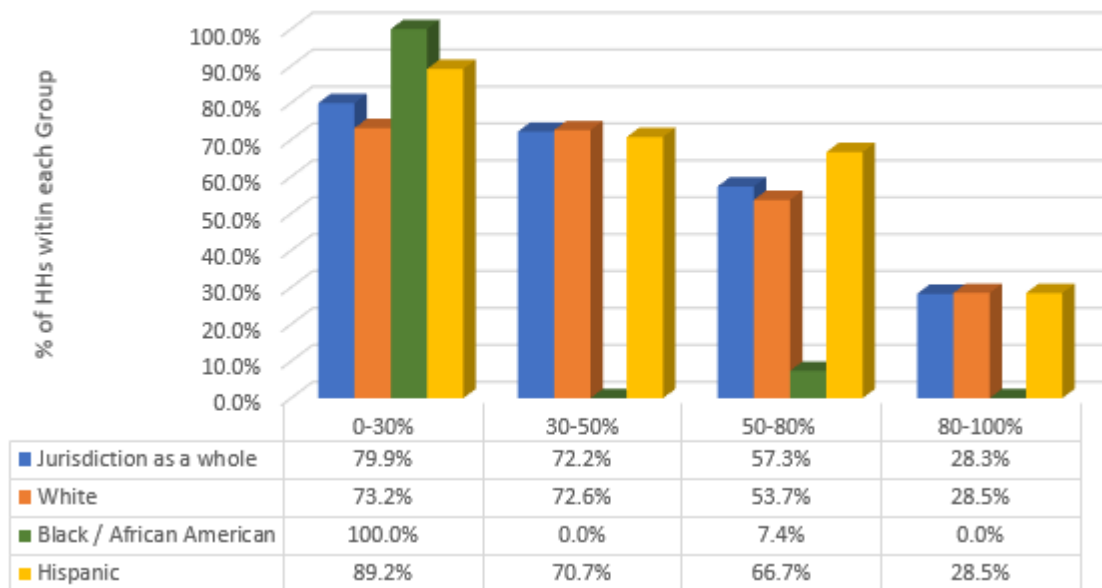
1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than 1.5 persons per room, 4. Cost Burden over 50%

Households with Housing Problems by Income and Race/Ethnicity based on Tables 13-16



Graph 5 - Households with Housing Problems by Income & Race/Ethnicity

Percent of HHs within Each Income and Race/Ethnicity with Housing Problems based on Tables 13-16



Graph 6 - Percent of Households with Housing Problems by Income & Race/Ethnicity

Discussion

For the extremely low-income households, the African Americans and Hispanics have a significantly higher rate of housing with problems than non-minority areas or the jurisdiction as a whole. However, as incomes rise, the rates for Hispanics are comparable to Whites. There are no African American households in the pre-populated data with incomes at 30-50% and only 10 at incomes of 80-100% voiding the comparison with other racial/ethnic groups. There are 54 African American households with incomes at 50-80% of the area, and only 7.4% have housing problems compared with 53.7% of whites and 66.7% of Hispanics. Again, the number of total African American households in any of the three income categories between 30% and 100% of area median is too small for drawing any conclusions regarding need.

NA-25 Disproportionately Greater Need: Housing Cost Burdens – 91.205 (b)(2)

Assess the need of any racial or ethnic group that has disproportionately greater need in comparison to the needs of that category of need as a whole.

Introduction:

The cross tabulation of housing cost burden by income and race/ethnicity is not provided in the American Community Survey upon which the pre-populated data are based. Below is a table and graph showing the number of households within three cost burden ranges by race/ethnicity.

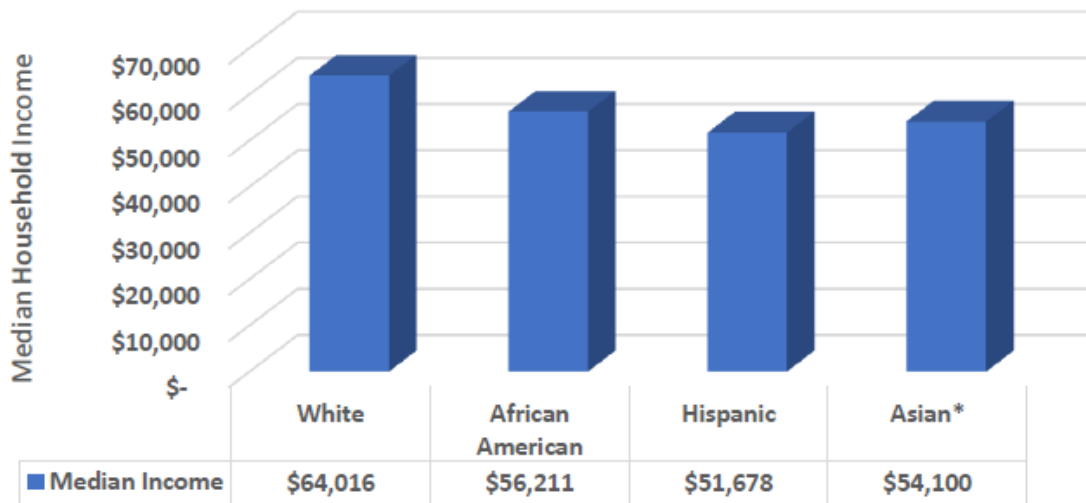
Housing Cost Burden

Housing Cost Burden	<=30%	30-50%	>50%	No / negative income (not computed)
Jurisdiction as a whole	16,529	3,725	2,025	90
White	11,600	2,425	1,305	75
Black / African American	505	80	65	0
Asian	105	45	0	0
American Indian, Alaska Native	30	0	15	0
Pacific Islander	0	0	0	0
Hispanic	4,185	1,120	620	15

Table 21 – Greater Need: Housing Cost Burdens AMI

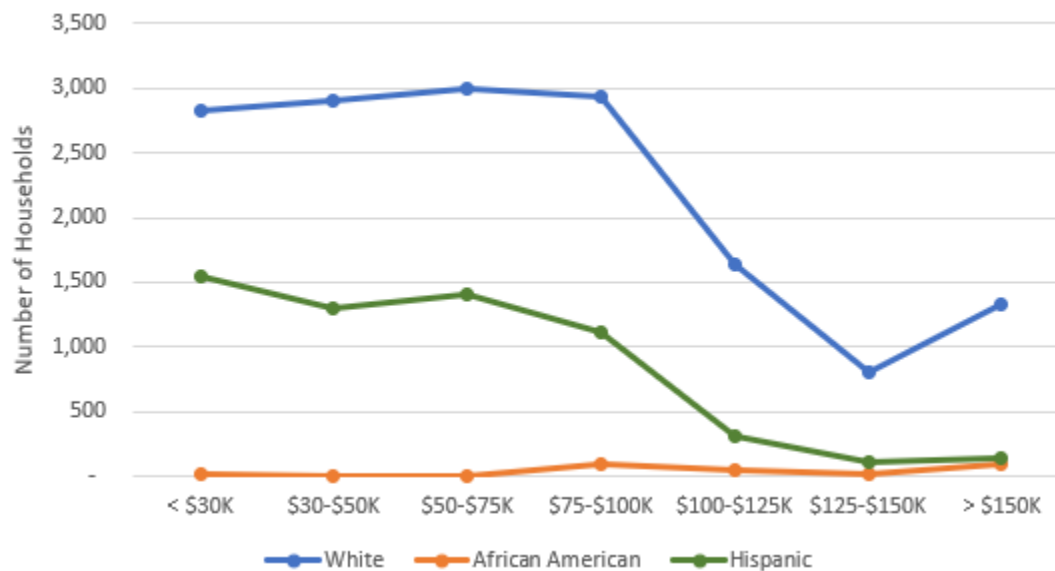
Data Source: 2011-2015 CHAS

Median Income by Race/Ethnicity



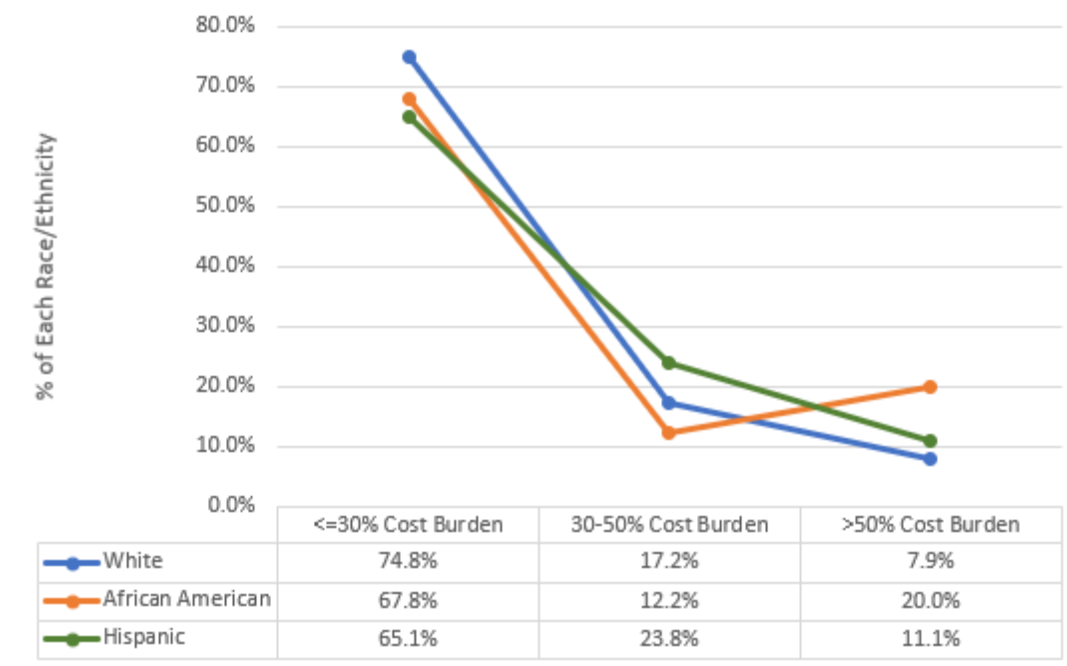
Graph 7 - Median Household Income

Households by Income Range and Race/Ethnicity



Graph 8 - Income Distributions by Race/Ethnicity

**Percent of Households by Level of Housing Cost Burden
and Race/Ethnicity based on Table 21**



Graph 9 - Percentage of Households by Housing Cost Burden by Race/Ethnicity

Discussion:

An affordable housing cost burden is 30% or less of income. The degree of housing cost burden is directly correlated with the level of income. Whites exceed minorities in median income by between \$7,805 for African Americans to \$9,916 for Hispanics and \$12,338 for Asians. Because there are so few Asian and even fewer Native Americans households in New Braunfels, any comparisons by race/ethnicity should be done with whites, African Americans and Hispanics. As would be expected, with the higher median incomes, whites have a higher percent of households with an affordable cost burden than African Americans or Hispanics. By analyzing households for all income ranges, the number with an affordable cost burden is about three-fourths of the total for each race/ethnicity. As the degree of cost burden rises, the percent of households declines dramatically. The percent of African American households with a cost burden 30% to 50% is less than whites or Hispanics, but also less than African Americans at greater than 50%, with a 7.8 percentage point higher rate. It should be kept in mind, that the total number of African American households for all incomes and cost burdens is much lower than whites or Hispanics.

NA-30 Disproportionately Greater Need: Discussion – 91.205(b) (2)

Are there any income categories in which a racial or ethnic group has disproportionately greater need than the needs of that income category as a whole?

Generally, both African American and Hispanic households have a greater need than white households, due primarily to the much lower incomes for both minority groups. The disparity in need is especially large for households with housing cost burdens of more than half of their income. All extremely low-income African Americans have at least one housing problem, contrasted with 89.2% of Hispanic households and only 73.2% of white households. The percent of Hispanic households with housing problems is much higher than whites for incomes at or below 30% of median and incomes at 50%-80% of median.

If they have needs not identified above, what are those needs?

All needs have been identified.

Are any of those racial or ethnic groups located in specific areas or neighborhoods in your community?

The majority of the minority population is concentrated inside Loop 337 within the CDBG Target Areas that by definition have more than 51% of households with incomes less than 80% of area median. As a result, the minority populations are generally within the older central core of the city.

NA-35 Public Housing – 91.205(b)

Introduction

The New Braunfels Housing Authority manages two properties and 242 Housing Choice Vouchers. The two public housing developments for a total of 170 units. Laurel Plaza has 100 units for elderly and/or disabled tenants. Laurel Plaza has 60 studio apartments and 40 one bedroom units plus a community center for resident activities and for use by other service providers. Villa Serena has a total of 70 units. There are 35 garden style duplexes for families with 30 two bedroom units, 36 three-bedroom units and four 4 bedroom units. *Landa Place* offers senior over the age of 55 a choice of one and two bedroom apartments. Landa Place is not managed by the New Braunfels Housing Authority but has 10 project-based vouchers at the property.

The Public Housing and Housing Choice Voucher waiting lists were closed in February 2020. There are 128 on the waiting list for Laurel Plaza and 247 on the waiting list for Villa Serena for a total of 375 on the public housing waiting lists. There are 54 on the waiting list for project-based vouchers at Landa Place and 484 on the Housing Choice Voucher list. The average length of time for the public housing waiting list is one to two years and for the HCV program, it is two plus years.

The information in the charts below is pre-populated data from HUD and cannot be changed in the on-line reporting system. The data for HCV program is inaccurate according to the New Braunfels Housing Authority. There are a total of 242 vouchers which includes the 10 project-based vouchers at Landa Place.

Totals in Use

	Program Type								
	Certificate	Mod-Rehab	Public Housing	Vouchers					
				Total	Project - based	Tenant - based	Special Purpose Voucher		
							Veterans Affairs Supportive Housing	Family Unification Program	Disabled *
# of units vouchers in use	0	0	170	290	9	281	0	0	0

Table 22 - Public Housing by Program Type

***includes Non-Elderly Disabled, Mainstream One-Year, Mainstream Five-year, and Nursing Home Transition**

Data Source: PIC (PIH Information Center)

Characteristics of Residents

	Program Type							
	Certificate	Mod-Rehab	Public Housing	Vouchers			Special Purpose Voucher	
				Total	Project - based	Tenant - based	Veterans Affairs Supportive Housing	Family Unification Program
Average Annual Income	0	0	10,767	12,167	10,537	12,219	0	0
Average length of stay	0	0	2	4	2	4	0	0
Average Household size	0	0	2	2	1	2	0	0
# Homeless at admission	0	0	0	0	0	0	0	0
# of Elderly Program Participants (>62)	0	0	62	72	8	64	0	0
# of Disabled Families	0	0	43	102	1	101	0	0
# of Families requesting accessibility features	0	0	170	290	9	281	0	0
# of HIV/AIDS program participants	0	0	0	0	0	0	0	0
# of DV victims	0	0	0	0	0	0	0	0

Table 23 – Characteristics of Public Housing Residents by Program Type

Data Source: PIC (PIH Information Center)

Race of Residents

Race	Certificate	Mod-Rehab	Public Housing	Program Type					
				Vouchers			Special Purpose Voucher		
				Total	Project - based	Tenant - based	Veterans Affairs Supportive Housing	Family Unification Program	Disabled *
White	0	0	164	277	8	269	0	0	0
Black/African American	0	0	6	11	1	10	0	0	0
Asian	0	0	0	1	0	1	0	0	0
American Indian/Alaska Native	0	0	0	1	0	1	0	0	0
Pacific Islander	0	0	0	0	0	0	0	0	0
Other	0	0	0	0	0	0	0	0	0
*includes Non-Elderly Disabled, Mainstream One-Year, Mainstream Five-year, and Nursing Home Transition									

Table 24 – Race of Public Housing Residents by Program Type

Data Source: PIC (PIH Information Center)

Ethnicity of Residents

Ethnicity	Certificate	Mod-Rehab	Public Housing	Program Type					
				Vouchers			Special Purpose Voucher		
				Total	Project - based	Tenant - based	Veterans Affairs Supportive Housing	Family Unification Program	Disabled *
Hispanic	0	0	52	120	4	116	0	0	0
Not Hispanic	0	0	118	170	5	165	0	0	0
*includes Non-Elderly Disabled, Mainstream One-Year, Mainstream Five-year, and Nursing Home Transition									

Table 25 – Ethnicity of Public Housing Residents by Program Type

Data Source: PIC (PIH Information Center)

Section 504 Needs Assessment: Describe the needs of public housing tenants and applicants on the waiting list for accessible units:

As with families with disabilities in privately owned housing, public housing residents with disabilities need housing units that provide easy access to the unit and all rooms within the unit; are free of obstacles that would prevent access to bath and kitchen facilities, and are designed in a way that allows those with disabilities access to cooking and food preparation surfaces. There are 280 applicants that identify as disabled on the waiting lists. All public housing developments operated by the New Braunfels Housing Authority provide accessible units within its complexes and is willing to make reasonable accommodations when requested. The New Braunfels Housing Authority meets the requirements of 5% of the units must be accessible for tenants with disabilities.

Most immediate needs of residents of Public Housing and Housing Choice voucher holders

The most immediate needs for HCV holders are additional vouchers, additional affordable units, and more landlords who are willing accept Housing Choice Vouchers. The Housing Choice Voucher program, formerly called Section 8, allows program participants to select rental housing of their choice within the HUD Fair Market rents and providing the housing passes Housing Quality Standards.

Public housing families most crucial needs are for employment that provides a living wage, reliable transportation and affordable day care. Public Housing senior and disabled tenants need reliable transportation, access to services and medical appointments and assistance with activities of daily living.

How do these needs compare to the housing needs of the population at large

The housing needs on the Public Housing and Housing Voucher Choice waiting lists are indicative of the general needs for affordable housing in the overall city. The need for more units and vouchers mirrors the need for better availability of affordable units for the population at large. A higher percentage of cost burdened households were noted under Extremely Low Income households.

Discussion

The City supports the efforts of the Housing Authority and will work to identify ways to partner together to provide safe, affordable housing and homeownership opportunities.

The number of people on the waiting list for both public housing units and HCVs and the length of time an applicant has to wait is indicative of the need for more affordable housing and more Housing Choice Vouchers. The greatest need is for more Housing Choice Vouchers in order to provide scattered-site housing and market-rate housing of choice for low-moderate income households.

NA-40 Homeless Needs Assessment – 91.205(c)

Introduction:

The information in this section provides an estimate of homeless individuals and families within several categories. These numbers are taken from the January 23, 2020 Point-in-Time survey conducted by Comal County Homeless Coalition. The information collected is derived from individuals in homeless situations and persons who are at risk in becoming homeless. The survey collects homelessness information such as age, gender, education, employment, reasons for homelessness, duration, night-time residence, family type, special needs, etc.

Homeless Needs Assessment

Population	Estimate the # of persons experiencing homelessness on a given night		Estimate the # experiencing homelessness each year	Estimate the # becoming homeless each year	Estimate the # exiting homelessness each year	Estimate the # of days persons experience homelessness
	Sheltered	Unsheltered				
Persons in Households with Adult(s) and Child(ren)	3	35	0	0	0	0
Persons in Households with Only Children	0	0	0	0	0	0
Persons in Households with Only Adults	35	0	0	0	0	0
Chronically Homeless Individuals	11	0	0	0	0	0
Chronically Homeless Families	0	0	0	0	0	0
Veterans	3	0	0	0	0	0
Unaccompanied Child	2	20	0	0	0	0
Persons with HIV	0	0	0	0	0	0

Table 26 - Homeless Needs Assessment

Data Source

Comments:

The 2020 Point-in-Time count was used to determine the Homeless Needs Assessment chart.

Indicate if the homeless population is: Has No Rural Homeless

If data is not available for the categories "number of persons becoming and exiting homelessness each year," and "number of days that persons experience homelessness," describe these categories for each homeless population type (including chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth):

The information listed below is based on the Point in Time count conducted on January 23, 2020. It should be noted that some interviewed did not answer all the questions on the survey and that interviews also completed what information was available through observation only. A total of 46 persons were counted and surveyed on the PIT night.

- Of the 46 persons counted 35 (76.09%) were sheltered, eight (17.39%) were unsheltered and three (6.52%) were observed by the surveyors.
- Of the 46 persons counted 35 (76.09%) were White; one (2.18%) was African American; two (4.35%) were American Indian, four (8.69%) were of Mixed Race and four (8.69%) were either listed as Other or Unknown on the survey. Fifteen (42.85%) White respondents identified their ethnicity as Hispanic.
- Of the 46 respondents 25 (54.35%) were male; 18 (39.13%) female and three (6.52%) unknown.
- Out of 40 responses, three (7.50%) were households with children, 35 (87.51%) were households without children and two (5.0%) were unaccompanied youth.
- Out of 31 responses, six (19.35%) reported receiving SSI/SSDI, one (3.23%) was receiving Veterans benefits and 24 (77.42%) were not receiving disability benefits.
- Out of 15 responses to the question of "how many times have you stayed in a shelter or on the streets in the past three years", eight (53.33%) were fewer than four times; six (40.0%) were four times or more; and one (6.67%) person preferred not to answer the question.
- Out of 43 responses to the question on Night-time Residence, 35 (81.39%) were staying in a shelter and the eight (18.61%) unsheltered respondents were staying in "Place Not Meant for Habitation" such as encampments, parks, on the streets; under bridges or in a vehicle.
- Out of 35 responses, 19 (54.28%) responded that it is their first time becoming homeless in the past three years, and 15 (42.87%) reported multiple episodes of homelessness in the past three years. One (2.85%) respondent stated that he did not know.
- Three (6.52%) respondents identified as veterans.
- Eleven (23.91%) respondents meet the definition of chronically homeless.

- Respondents were able to choose more than one reason as the cause of their homelessness. Addictions were 8.20%; Criminal History – 4.91%; Divorced/Separated – 7.37%; Domestic Violence – 12.20%; Evicted – 7.37%; Family/Personal Issues – 15.57%; Lack of Assistance/Resources – 10.65%; Unable to pay rent/mortgage – 7.73%; Unemployment – 12.29%; . Moved to Seek Work – 3.27%; and Physical/Mental Disabilities – 9.01%.

Nature and Extent of Homelessness: (Optional)

Race:	Sheltered:	Unsheltered (optional)
White	0	0
Black or African American	0	0
Asian	0	0
American Indian or Alaska Native	0	0
Pacific Islander	0	0
Ethnicity:	Sheltered:	Unsheltered (optional)
Hispanic	0	0
Not Hispanic	0	0

Data Source

Comments:

Estimate the number and type of families in need of housing assistance for families with children and the families of veterans.

Based on the results of the 2020 Homeless Point-in-Time count conducted by the Comal County Homeless Coalition, of the 46 respondents surveyed in the count, 6.52% were single veterans. Families were 7.5% which can be explained by the fact that many homeless families live doubled up with relatives and friends and move frequently.

There are 484 households on the Housing Choice Voucher waiting list and 54 on the waiting list for the project based vouchers for Landa Place. The public housing waiting list for Laurel Plaza is 128 and for Serena Villa there are 247 on the waiting list. The need for additional housing affordable to the extremely low-income is great and the availability of affordable housing for the low- and moderate-income is substantial. The Housing Choice Voucher and public housing wait lists were closed on February 2020. The public housing waiting list will open toward the end of 2020. There is not a date set for reopening the HCV waiting list. The lack of access to affordable housing for persons experiencing homelessness results in longer periods of time in emergency shelters that are located in other cities. An additional consequence of this is that when families must relocate to another city, their support network is no longer available.

The lack of access to affordable housing increases the risk of homelessness for many families that are precariously housed due to economic reasons. The types of families most affected by poverty are single parents in jobs that do not pay a living wage and often with the contributing factors of substance abuse, domestic violence, mental illness and child abuse in the family dynamic.

Describe the Nature and Extent of Homelessness by Racial and Ethnic Group.

Based on the results of the 2020 Homeless Point-in-Time count of the 46 persons counted 35 (76.09%) were White; one (2.18%) was African American; two (4.35%) were American Indian, four (8.69%) were of Mixed Race and four (8.69%) were either listed as Other or Unknown on the survey. Fifteen (42.85%) White respondents identified their ethnicity as Hispanic.

Describe the Nature and Extent of Unsheltered and Sheltered Homelessness.

People who are unsheltered in New Braunfels are a smaller group and tend to be single adults with few community supports or connections. Of those counted on January 23, 2020, 23.91% meet the definition of chronically homeless and are often dealing with mental illness, substance use disorders, chronic physical illness or co-occurring disorders. Due to their transient nature and the proximity to Austin and San Antonio, it is harder to estimate a number who fit into this category. Forty-six of the respondents counted during the 2020 PIT count, eight adults reported that they had spent the previous night in an unsheltered situation.

Discussion:

The City of New Braunfels is interested in working with housing providers to develop rapid re-housing and permanent supportive housing within the city limits which would allow those experiencing homelessness to remain in the area that is familiar to them and with their support group.

NA-45 Non-Homeless Special Needs Assessment - 91.205 (b,d)

Introduction:

Non-homeless special needs populations encompass a wide variety of persons and households and cannot be easily categorized except in very general terms. According to the American Community Survey of 2018, 14.1% of noninstitutionalized residents of New Braunfels reported having a disability. The percentage of disability varied by age – from 4.5% of people under 18 years of age, to 12.6% of people 18 to 64 years of age and to 37.%% of those 65 and over.

Describe the characteristics of special needs populations in your community:

Non-homeless special needs populations include the elderly, frail elderly, persons with physical and developmental disabilities, substance abusers, persons with mental illness, and persons living with HIV/AIDS. These families and individuals are living either with families, in group facilities, or independently. They have a variety of needs. In some cases, where parents are caring for disabled children, the future of their independence is at risk. Persons with physical or developmental disabilities often require special facilities and care. Persons with developmental disabilities sometimes lack the capacity to care for themselves and rely on a caretaker to see to their daily needs. More often than not the caretaker is a parent. If the child outlives the parent who provides their care, other arrangements must be made for their continued care which can prove difficult especially if the family does not have the ability or financial resources to provide care. According to the American Community Survey, 36.3% of seniors were responsible for the basic needs of their grandchildren.

What are the housing and supportive service needs of these populations and how are these needs determined?

Due to the COVID-19 Stay At Home restrictions, housing and supportive service needs were determined by reconciling needs identified in the PY19 Annual Action Plan, the on-line survey along with continued discussions at the Stakeholders meeting, with City staff and public hearing on needs and priorities. These populations have a broad spectrum of characteristics, similar to the population at large, but a distinguishing factor for them is an increased risk of homelessness due to the fragile nature of their existence, some relying heavily on others for their care, others living on fixed incomes and vulnerable to hardships caused by sudden demands on their resources.

Housing and supportive service needs of these populations include: Congregate housing, job training skills, affordable and accessible medical care and treatment, rehabilitation programs, counseling and peer support groups, prescription assistance, special transportation needs, and assistance with activities of daily living including food preparation and homebound meal delivery.

Discuss the size and characteristics of the population with HIV/AIDS and their families within the Eligible Metropolitan Statistical Area:

An HIV/AIDS diagnosis is hard on families. The effects of this diagnosis ripple throughout the whole family. Even in cases when an individual has a supportive family network, there are many potential struggles. People living with this diagnosis who are also parents or caregivers have their worries multiples. They have to worry not only about their own complex medical needs but also about the needs of their families. Both the individual and their family may face stigma. Financial concerns are also very real if an individual's health declines and they can no longer work or if their medical bills become overwhelming. There are currently 108 cases of HIV/AIDS in Comal County. There was not information specific to New Braunfels. In reviewing statistics by age group, ages 25-29 had the highest number of cases at 45.2%; ages 20-24 at 39% and ages 30-34 at 26.7%.

Discussion:

Stable affordable housing is essential for households that have special needs. Reliable transportation is necessary in order to receive medical care, rehabilitative services and case management services. The population of New Braunfels is growing rapidly. Consequently, the special needs population is growing and the lack of housing and supportive services for these populations is becoming more severe as the gap widens between the demand and availability for services and accessible affordable housing.

NA-50 Non-Housing Community Development Needs – 91.215 (f)

Describe the jurisdiction's need for Public Facilities:

The Public Facility Needs identified in the City through the Consolidated Planning process included upgrades to parks and recreation facilities, accessible play parks with proper wheelchair access and equipment suitable for all visitors including those with special needs and accessible trails.

How were these needs determined?

The City conducted a survey of residents and service providers asking their input into the needs of the City. Information on the need for accessible play parks discussed by residents at a City Council meeting. The survey was available online in English and Spanish. Questionnaires were distributed at the Stakeholders Meeting on March 4, 2020 and at the public hearing held on June 16, 2020. While the survey was not a statistically reliable instrument for prioritizing, it was a useful tool to include community concerns and preferences into consideration especially since the COVID-19 restrictions prevented group and one-on-one meetings. Additionally staff solicited input from the Parks & Recreation, Planning, Public Works, and Economic Development Departments. Staff took the results of the survey and the comments received from the meetings and City staff to determine the priorities and goals for the 2020-2024 Consolidated Plan.

Describe the jurisdiction's need for Public Improvements:

The Public Improvement needs identified in the City through the Consolidated Planning process included the need for maintenance, enhancement and expansion of streets, sidewalks, drainage, water and sewer connections.

How were these needs determined?

The City conducted a survey of residents, City staff and service providers asking for their input into the needs of the City. The survey was available online in English and Spanish. The Public Works department was consulted and provided information on public works needs for the upcoming five years as well as projects that are underway or already in the planning stage. Questionnaires were distributed at the Stakeholders Meeting on March 4, 2020 and at the public hearing held on June 16, 2020.

Describe the jurisdiction's need for Public Services:

During the development of the 2020 2024 Consolidated Plan, the City surveyed the local governments, non-profits, and the public regarding the needs of the community. As expected, nonprofit service providers identified services as the highest priority. In contrast, local governments identified few public services as high priority. However, the public and non-profits identified several public services as high priority especially transportation. The greatest public service needs were determined to the special needs populations because their access to services is very limited in an area without mass transit.

How were these needs determined?

The City conducted a survey of residents and service providers asking their input into the needs of the City. The survey was available online in English and Spanish. Questionnaires were distributed at the Stakeholders Meeting on March 4, 2020 and at the public hearing held on June 16, 2020. While the survey was not a statistically reliable instrument for prioritizing, it was a useful tool to include community concerns and preferences into consideration especially since the COVID-19 restrictions prevented group and one-on-one meetings. Additionally staff solicited input from the Parks & Recreation, Planning, Public Works, and Economic Development Departments. Staff took the results of the survey and the comments received from the meetings and City staff to determine the priorities and goals for the 2020-2024 Consolidated Plan.

Housing Market Analysis

MA-05 Overview

Housing Market Analysis Overview:

New Braunfels' housing market is predominately single family (74.6%) with only 6% in developments with 20 or more units. Additionally, the housing is relatively new with 41.7% being constructed between 2000 and 2017. Because of the large proportion of single family homes, most (68.6%) have three or more bedrooms. The fact that most are single family, larger, and newer results in housing that generally is out of reach for most low- to moderate-income households.

Of the 1,295 units for sale in April 2020, only 7 were priced below \$100,000, with 1,198 (92.4%) having an asking price of \$200,000 or more. There were 1,341 units for rent in April 2020. None were renting for less than \$750 and only 158 (11.8%) were renting for \$750-\$1,000. Units for rent have only 158 (11.8%) at \$1,000. A \$42,000 household income is required to rent a \$1,000 units without having an undue cost burden. Moderate-income households (80% of AMI) can afford rentals of \$1,420, but only 703 (52.3%) have a cost for \$1,000 to \$1,500, just over affordability. Another 287 units for rent are affordable to households at median income, with 93 units priced above \$1,750.

There is a shortage of both sale and rental units affordable to the low- to moderate-income in New Braunfels, and available and occupied together have a shortage of homes affordable to the households at 80-100% of median, forcing the overflow to trickle down to absorb units affordable to the moderate-income. This forces the moderate-income to absorb units affordable to the very low-income, who in turn absorb virtually all the units affordable to the extremely low-income.

According to the ACS there were an estimated average of 1,935 vacant units in New Braunfels from 2013-2017. Of these 390 were available for rent; 71 were rented but not yet occupied; 136 were for sale; 15 were sold but not yet occupied; 607 were held for seasonal or recreational use; and 716 were classified as "other", including abandoned, unsound, or undetermined. No information is provided on the cost for the units for sale or rent or of the condition of the units not on the market.

MA-10 Number of Housing Units – 91.210(a)&(b)(2)

Introduction

Three-fourths of the housing in New Braunfels is single-family and only 6.2% of the housing units are in multi-family developments of 20 units or more. As a result, rentals are higher than would occur in areas with a high percentage of large apartment complexes. In New Braunfels many renters are in single-family housing, and nearly half of all renters are in housing with three or more bedrooms, and 93.1% of owners have three or more bedrooms. The type of housing – single-family with three or more bedrooms - results in a shortage of both rental and sale units that are out of reach of a large portion of the population.

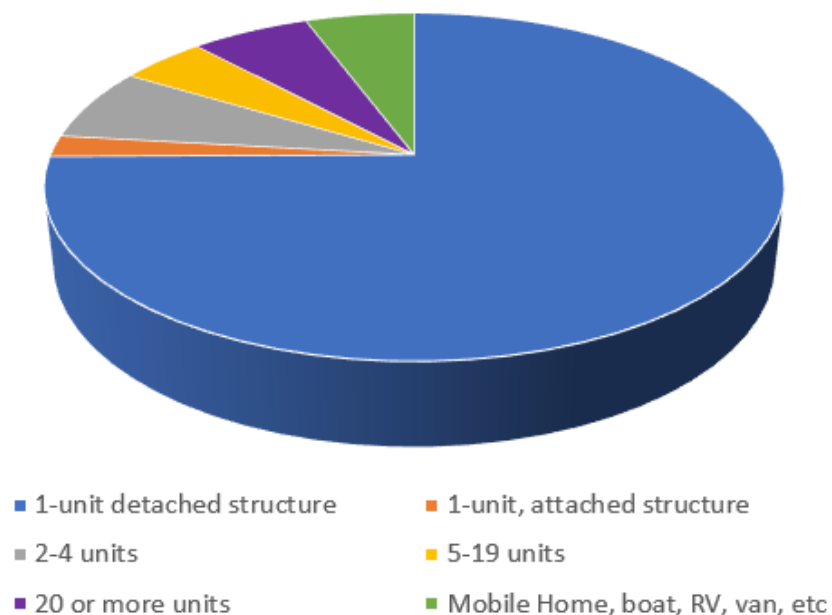
All residential properties by number of units

Property Type	Number	%
1-unit detached structure	17,895	73%
1-unit, attached structure	474	2%
2-4 units	1,615	7%
5-19 units	1,780	7%
20 or more units	1,480	6%
Mobile Home, boat, RV, van, etc.	1,375	6%
Total	24,619	100%

Table 27 – Residential Properties by Unit Number

Data Source: 2011-2015 ACS

Distribution of Housing by Property Type
based on Table 31



Graph 10 - Units in Structures

Unit Size by Tenure

	Owners		Renters	
	Number	%	Number	%
No bedroom	40	0%	140	2%
1 bedroom	115	1%	1,600	21%
2 bedrooms	1,545	10%	2,944	39%
3 or more bedrooms	13,145	89%	2,835	38%
Total	14,845	100%	7,519	100%

Table 28 – Unit Size by Tenure

Data Source: 2011-2015 ACS

Describe the number and targeting (income level/type of family served) of units assisted with federal, state, and local programs.

The New Braunfels Housing Authority continues to manage 170 public housing units at two separate sites. The New Braunfels Housing Authority has one site that is multi-family, and one site that is for elderly/disabled tenants. The sites are as follows:

- Laurel Plaza – 60 studio and 40 one-bedroom units for elderly and/or disabled single adult tenants
- Villa Serena – garden type duplexes for families with 30 two-bedroom, 36 three-bedroom and 4 four-bedroom units.

All units are targeted to low-income households, defined as defined by the US Department of Housing and Urban Development's published income limits. The Housing Authority manages 242 Housing Choice Vouchers.

Provide an assessment of units expected to be lost from the affordable housing inventory for any reason, such as expiration of Section 8 contracts.

New Braunfels does not anticipate the loss of any housing units from the affordable housing inventory.

Does the availability of housing units meet the needs of the population?

There is a significant shortage of units affordable to the extremely low- and very low-income households, especially families needing more than one bedroom. According to the ACS data, approximately 2,627 (18.5%) of owners and 3,500 (45.9%) of renters have a housing cost burden greater than 30% of their income. Currently, the median rent for a one bedroom unit is \$1,042, requiring an income of \$41,680 to be affordable. The income required for a three bedroom rental is \$63,560. Only 647 units are affordable to the 2,640 extremely low-income households, with 1,174 units affordable to the 3166 very low-income households. This forces the extremely low-income to rent above affordability, pushing the very low-income into the same situation, resulting in a shortage of affordable housing for the moderate-income

renters. This results in an affordability mismatch in New Braunfels where higher-income households are renting units below their maximum affordability, forcing lower-income households to rent available units above affordability. Based on the Location Affordability Index (LAI), updated in 2017 for block group level data, the median housing cost burden for households at 50% AMI ranged from 28.2% to 64.4% of income. The housing plus transportation costs for households at 50% AMI the median block group rents ranged from 54.3% to 100% of income. Owners at 50% AMI have an even greater cost burden than renters, based on the 2017 LAI. Median block group level housing costs for owners at 50% AMI ranged from 29.3% to 82%, and with transportation costs added, the total median expended ranged from 64.3% to over 100% of income.

Describe the need for specific types of housing:

There is a need for affordable housing for all low- to moderate-income households – rental and owner. However, the greatest need is for one and two bedroom rental units at \$750/month or less and for homeownership with monthly costs at or below \$750/month. To accomplish the rental needs, additional public housing units, Section 8 Housing Choice Vouchers, and more Low Income Housing Tax Credit units are needed. For homeownership, existing owners, particularly the elderly, living in older homes need assistance with rehabilitation to lower utility costs and prevent additional costly damage. Those who are looking to purchase a home, need homebuyer counseling to ensure that they don't "over buy" and place themselves in a situation of possible foreclosure. In addition, more manufactured homes on a slab or other cost efficient housing are needed for homebuyers. More 55+ complexes and subdivisions are needed for the community

Discussion

New Braunfels is typical of all U.S. cities in that there is insufficient sound housing for the extremely low- and very low-income renters and owners. There is a shortage of funding for public housing units and Section 8 HCVs, as well as tax credits and other incentives to developers to provide housing that would not be financially feasible in the open market.

MA-15 Housing Market Analysis: Cost of Housing - 91.210(a)

Introduction

Housing is the most expensive, and the most necessary, item a renter or homeowner has. HUD has determined through years of research that households paying more than 30% of their income on housing have a cost burden that cannot be sustained over time. A housing cost burden of more than half of their income moves them into an at-risk category that can lead to homelessness or doubling up with other family members or other unrelated households. New Braunfels has seen rapid housing growth this century, with nearly half of the housing having been built since 2000. New housing, even if subsidized, coupled with general inflation, results in higher prices to residents, many of whom are not seeing equal increases in incomes. Low- to moderate-income households are particularly vulnerable to being forced to secure housing above sustainable rates. The tables below that have been pre-populated by HUD based on special cross-tabulations from the American Community Survey (ACS), are from the 2009-2013 survey. Costs have risen since in the past seven years while incomes, especially for unskilled laborers have not kept pace with all sectors of the cost of living.

Cost of Housing

	Base Year: 2009	Most Recent Year: 2015	% Change
Median Home Value	140,400	170,300	21%
Median Contract Rent	677	834	23%

Table 29 – Cost of Housing

Data Source: 2005-2009 ACS (Base Year), 2011-2015 ACS (Most Recent Year)

Rent Paid	Number	%
Less than \$500	1,214	16.2%
\$500-999	4,224	56.2%
\$1,000-1,499	1,800	24.0%
\$1,500-1,999	165	2.2%
\$2,000 or more	115	1.5%
Total	7,518	100.0%

Table 30 - Rent Paid

Data Source: 2011-2015 ACS

Housing Affordability

% Units affordable to Households earning	Renter	Owner
30% HAMFI	314	No Data
50% HAMFI	919	800

% Units affordable to Households earning	Renter	Owner
80% HAMFI	3,593	2,695
100% HAMFI	No Data	4,545
Total	4,826	8,040

Table 31 – Housing Affordability

Data Source: 2011-2015 CHAS

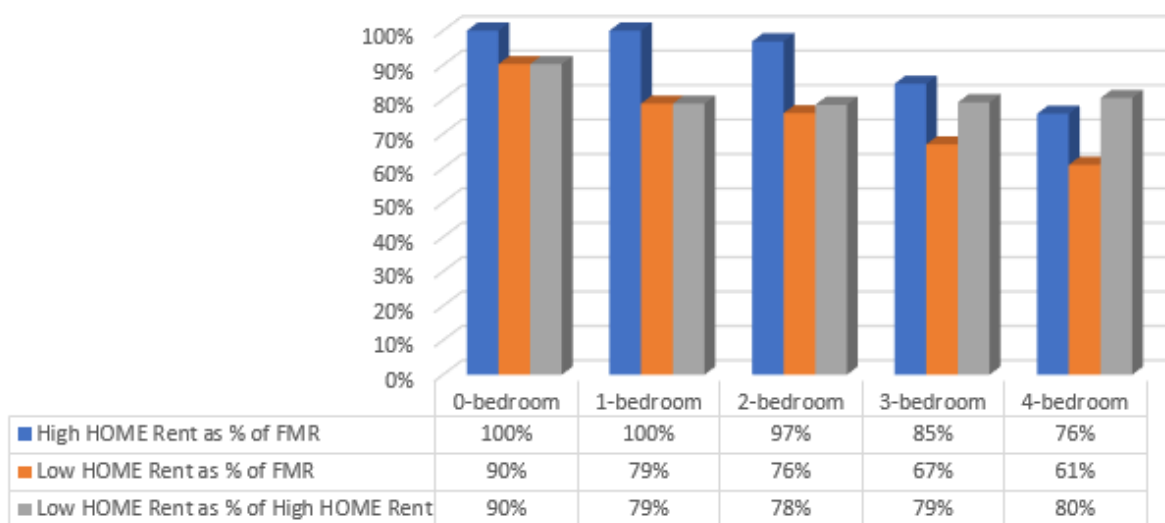
Monthly Rent

Monthly Rent (\$)	Efficiency (no bedroom)	1 Bedroom	2 Bedroom	3 Bedroom	4 Bedroom
Fair Market Rent	0	0	0	0	0
High HOME Rent	0	0	0	0	0
Low HOME Rent	0	0	0	0	0

Table 32 – Monthly Rent

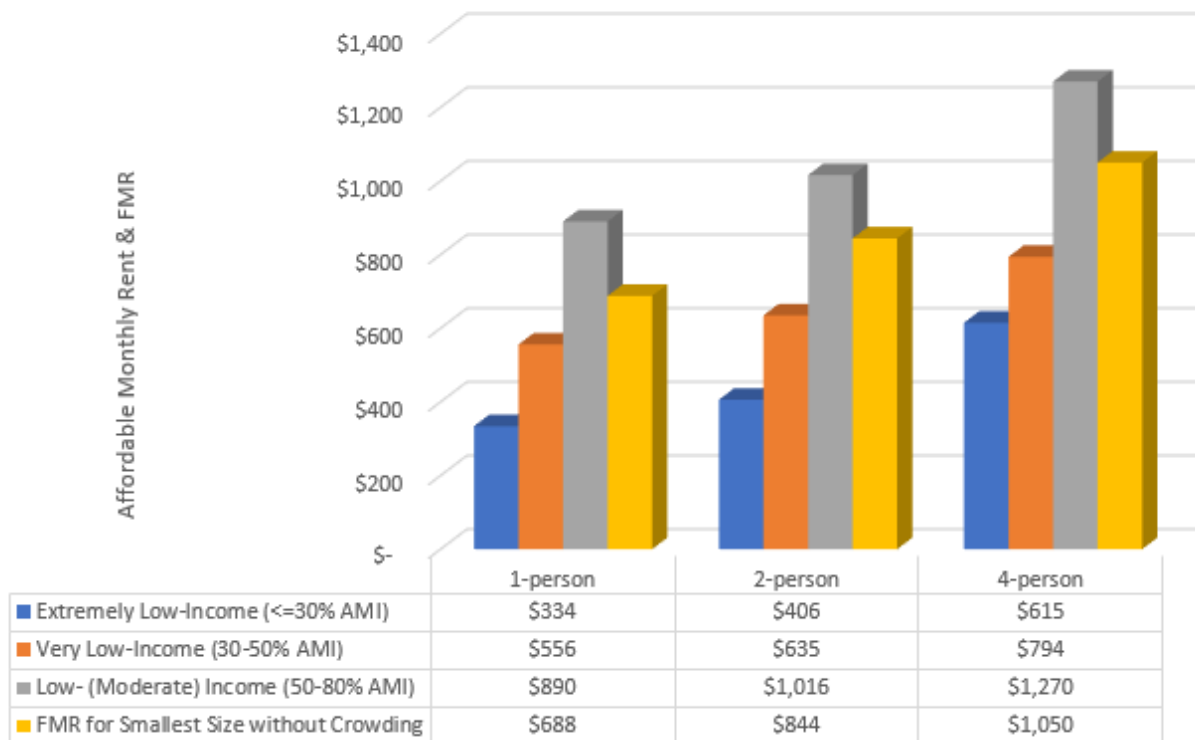
Data Source Comments:

Comparison of Fair Market, High HOME and Low HOME Rents based on Table 36



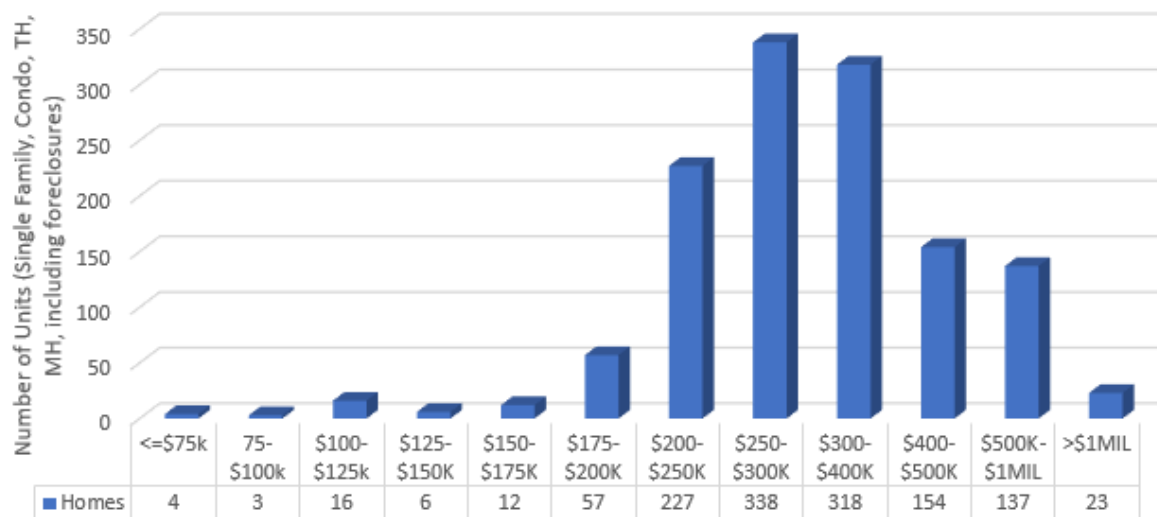
Graph 11 - Area Rents by FMR, High Home & Low Home

2017 Rental Affordability by HH Size with Fair Market Rents

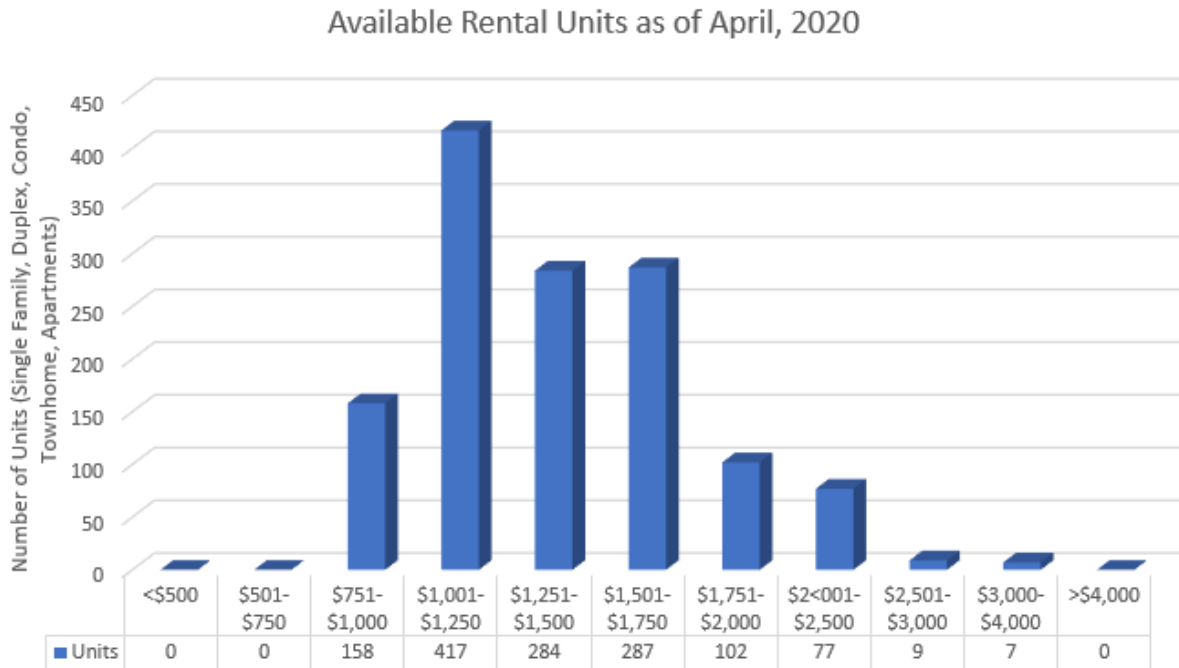


Graph 12 - Rents Affordable by Income Compared with Lowest FMR for Household Size

Available Units for Sale by Asking Price for April 2020



Graph 13 - Available Units for Sale by Asking Price for April 2020



Graph 14 - Available Rental Units as of April 2020

Is there sufficient housing for households at all income levels?

There is a definite housing affordability mismatch for renters and owners. For low- to moderate-income renters and owners there is a significant shortage of affordable housing due to the lack of high-cost housing that pushes the households above median into renting or buying units affordable to the low- to moderate-income. There is a 624-unit shortage for extremely low-income renters with 821 extremely low-income homeowners paying more than 30% of income for their housing. For very low-income renters, there is a shortage of 550 affordable rentals and 587 affordable owner-occupied homes. Moderate-income renters are in need of 620 additional affordable units while there is an approximate 1,000 unit surplus for moderate-income owners. Higher income renters are renting under the 30% affordability, particularly under 20% of income, absorbing the units that would be affordable to the moderate- to middle-income renter, forcing them to rent units affordable to the low- to moderate-income. Likewise, owners at or above median income are in homes that would be affordable to lower-income buyers, most often due to owners having no mortgage. The trickle-down effect lands with the very low-income paying on average 40% of their income on rent or renting units affordable to the extremely low-income. This leaves the extremely low-income renters paying 50% or more on rent.

Only 6.2% of the housing in New Braunfels is in multi-family developments of 20 or more units. Economies of scale indicate that the larger complexes are able to keep units more affordable. Additionally, less than 10% of the housing are micro-units and one bedroom, requiring single-person households to rent or purchase larger, more costly dwellings, placing them out of affordability. Therefore, there is a need for more multi-family complexes at affordable rents and condominiums/townhomes for owners at affordable mortgages.

How is affordability of housing likely to change considering changes to home values and/or rents?

The affordability of housing is likely to worsen as house values and rents rise at a rate higher than incomes. As New Braunfels continues to become squeezed between San Antonio and Austin, the higher income commuters will be demanding higher cost housing which will move developers and home builders into adjusting to the higher market. It is too early to tell how COVID-19 and any subsequent pandemics will affect incomes, thereby affecting housing affordability. As with any disaster, housing costs usually increase as the developers and landlords attempt to recover lost income during the situation. Cost increases are rarely, if ever, temporary and become the norm, creating a greater affordability mismatch for those below median income.

How do HOME rents / Fair Market Rent compare to Area Median Rent? How might this impact your strategy to produce or preserve affordable housing?

High HOME rents are comparable to Fair Market Rents for micro-units through two bedroom units but considerably lower for three and four bedroom rentals, trailing three bedroom rentals by \$200 and four bedroom rentals by \$400. Most four bedroom rentals are single-family homes garnering a much higher price than multi-family dwellings. Low HOME rents are \$60 to \$80 below the FMRs for efficiencies and 1-bedroom units. The disparity increases as the rents increase, as shown by the table and graph above.

New Braunfels encourages private developers to produce additional affordable rental units and to secure Low Income Housing Tax Credits, but without HOME funds, there is little that can be done on a municipal level to produce or fund the production of affordable housing. The City does provide CDBG funding to local non-profit agencies to rehabilitate owner-occupied housing but there is no program to preserve rental housing.

Discussion

Without HOME funds, the City of New Braunfels must rely on private developers to secure tax credits or other incentives that will result in the construction of new affordable rental and ownership homes. City-based incentives, such as waiving fees, can only reduce the unit costs slightly, requiring developers of affordable housing to secure monetary assistance elsewhere. Even the low HOME Rents are out of reach for the extremely low- and very low-income households. Additional public housing and Section 8 HCVs are needed to assist in addressing the affordability issue.

MA-20 Housing Market Analysis: Condition of Housing – 91.210(a)

Introduction

Housing Cost Burden is the primary condition that deems a household as having a housing problem/condition that requires remedy. However, as housing ages structural issues present even greater challenges. Most likely, those homes and rentals built after 2000 with a housing problem have only housing cost burden as the issue. Structures built between 1980 and 2000 may need a new roof, new HVAC system, and new plumbing, if these items have not been replaced. Any of these three conditions are also likely to have caused damage to sheetrock or the structure as they were/are malfunctioning. Many will have foundation problems. Dwellings built before 1980, 1978 to be precise, may have lead-based paint hazards and some structural problems. The dwellings built before 1980 are likely to have on-going deterioration. Most mobile homes built before 1980 have outlived their soundness and safety. Of the owner-occupied units, 1,460 owners moved in prior to 1980, though there is no information on the age of the house at the time of move-in. However, the owners are elderly or nearing 65 years of age and, many likely will not be able to maintain their property as they were when they were younger and employed. Deferred maintenance leads to serious structural problems.

Definitions

After the 1970 Census, the Census Bureau began removing pertinent questions about the condition and quality of dwellings. Now, with the ACS replacing the decennial census “long form” (completed by only 1 in 7 households), the only indicators of housing condition are incomplete plumbing and/or kitchen facilities and/or lacking a heating source. However, these three questions are not cross-tabulated except in the Public Use Microdata Sample (PUMS) data for very large geographic areas. HUD defines housing problems based more on the residents than the residences – having a housing cost burden and/or overcrowding. Looking at the physical condition, less than 1% (194) of the occupied housing units are lacking safe heating fuel; and 190 renters and 25 owners are in units lacking complete plumbing and/or kitchens. The Census does not designate the number of units lacking complete kitchens that are Single Room Occupancy and micro-units which would not constitute as a housing problem because they are meant to have communal dining.

Condition of Units

Condition of Units	Owner-Occupied		Renter-Occupied	
	Number	%	Number	%
With one selected Condition	2,825	19%	3,100	41%
With two selected Conditions	70	0%	360	5%
With three selected Conditions	0	0%	0	0%
With four selected Conditions	0	0%	0	0%
No selected Conditions	11,955	81%	4,055	54%
Total	14,850	100%	7,515	100%

Table 33 - Condition of Units

Data Source: 2011-2015 ACS

Year Unit Built

Year Unit Built	Owner-Occupied		Renter-Occupied	
	Number	%	Number	%
2000 or later	7,170	48%	2,395	32%
1980-1999	3,583	24%	2,135	28%
1950-1979	3,058	21%	2,279	30%
Before 1950	1,030	7%	700	9%
Total	14,841	100%	7,509	99%

Table 34 – Year Unit Built

Data Source: 2011-2015 CHAS

Risk of Lead-Based Paint Hazard

Risk of Lead-Based Paint Hazard	Owner-Occupied		Renter-Occupied	
	Number	%	Number	%
Total Number of Units Built Before 1980	4,088	28%	2,979	40%
Housing Units build before 1980 with children present	3,265	22%	2,355	31%

Table 35 – Risk of Lead-Based Paint Hazards

Data Source: 2011-2015 ACS (Total Units) 2011-2015 CHAS (Units with Children present)

Vacant Units

	Suitable for Rehabilitation	Not Suitable for Rehabilitation	Total
Vacant Units	0	0	0
Abandoned Vacant Units	0	0	0
REO Properties	0	0	0
Abandoned REO Properties	0	0	0

Table 36 - Vacant Units

Data Source: 2005-2009 CHAS

Need for Owner and Rental Rehabilitation

There is no definitive information on the number of owner or rental units in need of rehabilitation. An approximate number of owner-occupied homes in need of rehabilitation is 2,500 based on age, lacking plumbing, lacking heating and having a value of less than \$50,000 when the median value is \$170,300. The estimate is made with the assumption that (1) most of the 3,221 counted based on the above conditions have multiple conditions; and (2) another 5,000 were built between 1950 and 1980 with some potential

problems. Adjustments to both numbers were made due to the need expressed by stakeholders resulting in the 2,500 units, with at least 1,500 being low-to moderate-income owners.

It can be estimated that most of the 444 rentals with rents less than \$500 are in need of some repairs given that even the average efficiency rents for \$650 - \$750 and only one unit in April 2020 was available for rent for less than \$750. This indicates that units rented for less than \$500 have some level of housing problem.

Estimated Number of Housing Units Occupied by Low or Moderate Income Families with LBP Hazards

A cross-tabulation from the 5% Public Use Microdata Sample (PUMS) of households in housing units built before 1980 and with low- to- moderate incomes with the estimates above from ACS resulted in an estimate of 7,607 households in units built before 1980, with an estimated 5,450 being LMI and 2,480 of those having children. The PUMS data includes Comal and Guadalupe County and estimates for New Braunfels only have been extrapolated

Discussion

In general, the housing in New Braunfels is good to excellent, with nearly half being constructing this century. However, there are an estimated 2,895 owner-occupied units and 3,460 renter-occupied units with at least one problematic condition. This is approximately 26% of all occupied units, with the vast majority having only a housing cost burden problem.

MA-25 Public and Assisted Housing – 91.210(b)

Introduction

The New Braunfels Housing Authority manages two properties and 242 Housing Choice Vouchers. The two public housing developments have a total of 170 units. Laurel Plaza has 100 units for elderly and/or disabled tenants. Laurel Plaza has 60 studio apartments and 40 one bedroom units plus a community center for resident activities and for use by other service providers. Villa Serena has a total of 70 units. There are 35 garden style duplexes for families with 30 two bedroom units, 36 three-bedroom units and four 4- bedroom units. *Landa Place* offers seniors over the age of 55 a choice of one and two bedroom apartments. Landa Place is not managed by the New Braunfels Housing Authority but has 10 project-based vouchers at the property.

The information in the charts below is pre-populated data from HUD and cannot be changed in the on-line reporting system. The data for HCV program is inaccurate according to the New Braunfels Housing Authority. There are a total of 242 vouchers which includes the 10 project-based vouchers at Landa Place.

Totals Number of Units

	Program Type								
	Certificate	Mod-Rehab	Public Housing	Vouchers					
				Total	Project -based	Tenant -based	Special Purpose Voucher		
							Veterans Affairs Supportive Housing	Family Unification Program	Disabled *
# of units vouchers available	0	0	170	292	4	288	0	0	0
# of accessible units									
*includes Non-Elderly Disabled, Mainstream One-Year, Mainstream Five-year, and Nursing Home Transition									

Table 37 – Total Number of Units by Program Type

Data Source: PIC (PIH Information Center)

Describe the supply of public housing developments:

Describe the number and physical condition of public housing units in the jurisdiction, including those that are participating in an approved Public Housing Agency Plan:

The New Braunfels Housing Authority manages 170 units of public housing in two locations in the city.

- Laurel Plaza has 60 efficiency units and 40 one-bedroom units for a total of 100 units. The property houses single adults who are elderly or have a disability or both.
- Villa Serena has 30 two-bedroom units, 36 three-bedroom units, and four 4-bedroom units for a total of 70 units. Villa Serena houses families with children

The New Braunfels Housing Authority follows their approved Public Housing Agency Plan. Laurel Plaza, with 100 units, and Serena Gardens, with 70 units, are approximately 40 years old. The Housing Authority is updating and modernizing units at turnover and improving systems and common areas for the properties.

Public Housing Condition

Public Housing Development	Average Inspection Score
New Braunfels Housing Authority	85

Table 38 - Public Housing Condition

Describe the restoration and revitalization needs of public housing units in the jurisdiction:

As with any 40 year old properties, there are a number of issues that need to be addressed. The New Braunfels Housing Authority is upgrading its housing units at turn over as well as working to upgrade the systems and common areas.

Describe the public housing agency's strategy for improving the living environment of low- and moderate-income families residing in public housing:

The Housing Authority is improving their properties by modernizing units at turnover and improving systems and common areas. Annually, the Housing Authority budgets \$300,000 for such improvements.

Discussion:

NBHA is investing considerable HUD funds into the upgrading of its inventory through modernization of the units and common areas. There is the need for additional public housing units as there are 375 households on the waiting list at this time. There is also a need for additional HCVs and units that will pass Housing Quality Standards and rent at or below the published HUD Fair Market Rents.

MA-30 Homeless Facilities and Services – 91.210(c)

Introduction

Shelter, housing and services for individuals and families experiencing homelessness in New Braunfels is limited. There are shelters for special populations such as youth and victims of domestic violence and sexual assault but there are no shelters open to individuals that do not qualify for these shelters. Family Promise, The Way Home, provides emergency shelter and transitional housing to families experiencing homelessness. This is due to the relatively small number of homeless in the City and the proximity of the multiple programs and shelters in Austin and San Antonio. Many individuals and families experiencing homelessness in the City must relocate to one of the larger cities where comprehensive housing and supportive service programs are available.

Family Promise of Greater New Braunfels is a partnership of churches agreeing to open their doors, their classrooms, their gyms, and their hearts to serve as hospitality centers to guests. Offering temporary housing, meals and support, the Way Home provides basic needs, shelter, and transportation. The program is designed to build family stability and transition families to self-sufficiency through case management and connections to community resources.

The Transitional Living Program at Connections houses youth ages 15 to 21 and is designed to better prepare them for productive independent living. Residential staff and counselors provide guidance in the areas of goal setting, financial planning, educational coaching, and employment assistance. Connections operates two shelters for youth ages 5-17 who are in crisis and need a safe place to stay. The program accepts youth referred due to runaway behaviors, family conflict, abuse, neglect, or homelessness; this includes youth who are part of the foster care system who have recently been removed from home as well as those being relocated from a different placement. In addition to meals and short-term housing, the shelters offer individual, group, and family counseling, recreational activities and transportation to educational and medical services.

The primary homeless providers serving New Braunfels are the Comal County Crisis Center, Family Promise, Salvation Army and Connections. These programs offer emergency shelter and supportive services. There are local agencies that provide assistance with food, clothing, employment searches, child care and gasoline. Local programs and mainstream services are available to the residents of New Braunfels are also available to the homeless population. Additionally, there are organizations specializing in services targeted to special populations experiencing homelessness.

The City provides CDBG funding to service providers including homeless providers and encourages the development of transitional, rapid re-housing and permanent supportive housing programs for individuals and families experiencing homelessness.

Facilities and Housing Targeted to Homeless Households

	Emergency Shelter Beds		Transitional Housing Beds	Permanent Supportive Housing Beds	
	Year Round Beds (Current & New)	Voucher / Seasonal / Overflow Beds	Current & New	Current & New	Under Development
Households with Adult(s) and Child(ren)	44	0	0	0	0
Households with Only Adults	0	17	0	0	0
Chronically Homeless Households	0	0	0	0	0
Veterans	0	0	0	0	0
Unaccompanied Youth	20	0	0	0	0

Table 39 - Facilities and Housing Targeted to Homeless Households

Data Source Comments: The 2020 Point-in-Time and the HIC provided the data for the above chart.

Describe mainstream services, such as health, mental health, and employment services to the extent those services are used to complement services targeted to homeless persons

Mainstream services are publicly funded programs that provide services, housing and income supports to low-income persons whether they are experiencing homelessness or not. It includes programs providing TANF, Medicaid, Social Security benefit including SSI, health care, mental health care, substance abuse treatment programs, Workforce programs and veteran's assistance.

Mainstream providers in New Braunfels are:

- Texas Human Services Department
- TANF – Temporary Aid to Needy Families
- Medicaid – Payment for medical services for low-income adults, elderly, disabled and children
- SNAPs and WIC – Food assistance
- Mental Health and Substance Abuse services
- Aging – Assistance with benefits
- Social Security SSI – Disability income payments
- Workforce Solutions – Pre-employment services; Job training; and Job Placement
- Hill Country MHDD Centers – (see description of services below)

Most service and housing agencies have a system in place for mainstream benefits that provides for assessment of eligibility during the intake process; a referral process to mainstream agencies; a system of follow-up to track who receives benefits; and methods of tracking and ensuring that mainstream benefits continue to be received.

List and describe services and facilities that meet the needs of homeless persons, particularly chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth. If the services and facilities are listed on screen SP-40 Institutional Delivery Structure or screen MA-35 Special Needs Facilities and Services, describe how these facilities and services specifically address the needs of these populations.

Hill Country MHDD Centers offer multiple programs that assist residents of New Braunfels including those experiencing homelessness.

- Children and Adolescent Services providing counseling, family therapy, crisis intervention, respite care, parents support group, skills training and development and the Youth Empowerment Service Program – a program designed to provide comprehensive and coordinated wraparound services built on the unique needs of the child and the family.
- Co-occurring Psychiatric and Substance Use Disorders services providing individual counseling, group counseling, and support groups to address a variety of issues such as relationship, employment, budgeting, emotional support, and legal issues.
- The Linda J. Werlein Hill Country Crisis Stabilization Unit is a 16-bed, inpatient psychiatric unit servicing adults age 18 and over who are experiencing a mental health crisis and whose symptoms

interfere with a person's ability to remain safely in the community. Services focus on acute, short-term crisis stabilization providing psychiatric, psychological and nursing services.

- Intellectual and Developmental Disability Authority provides services include determining a person's eligibility for services, enrolling into programs, and coordinating and monitoring ongoing service as well as Home and Community-Based Services and Texas Home Living Interest Lists to assist students transitioning from school services to community-based services, and aiding families who are seeking residential services for children and adults.
- Mobile Crisis Outreach Team are trained professionals who respond to individuals experiencing a mental health crisis and need immediate support. The team is available 24 hours per day, seven days per week to provide on-site services within the community and provides a combination of crisis services for children and adults including assessment, case management, crisis follow-up and support necessary for the individual to remain in the community.
- Peer Support Groups share their experiences, provide support, work to develop new skills, and empower voice and choice.
- Outpatient Treatment Services focusing on person-centered services, each individual is assessed and specific services tailored to what is important to them are created.
- The Military Peer Network is a Peer-to-Peer based program developed to train Veteran Volunteers across our service area to build support networks within their community. Veteran Volunteers are trained to facilitate group activities, while building camaraderie, trust, and community support through resource identification/linkage, and community engagement.
- The Youth Crisis Respite Center serves teenagers between the ages of 13 and 17 who are experiencing a need for a short-term "break" from a pending or existing stressor. The center provides short-term residential crisis services to youth with low risk of harm to self or others. Respite services are provided in a safe, caring, traditional home environment with 24-hour supervision.

New Braunfels Workforce Solutions offers a variety of programs with some being targeted to special needs populations. Service providers can also contract with Workforce Solutions to provide specialized training to their clients and they will customize trainings based on a commitment by an employer to employ the individuals upon successful completion of the training. Services provided are job searches, job readiness training, short-term trainings and skills upgrading and retraining.

The Family Life Center provides emergency rent and utility assistance to low-moderate residents of New Braunfels along with case management services in order to stabilize housing and prevent homelessness.

The Comal County Crisis Center, in addition to emergency shelter for victims of domestic violence and sexual assault, offers case management, crisis intervention, crisis hot line, counseling, parenting classes, programs for children, and referrals to other services.

Connections provides case management, counseling and support services as well as emergency shelter to youth who are experiencing homelessness or aging out of foster care.

The Salvation Army provides meals, food, household supplies, clothing, and similar goods. Emergency financial assistance may be provided when funding is available.

MA-35 Special Needs Facilities and Services – 91.210(d)

Introduction

Special needs populations in New Braunfels include the elderly; frail elderly; persons with mental, physical, developmental disabilities; persons with HIV/AIDS; and persons with substance abuse problems. There are limited special needs facilities in New Braunfels and no permanent supportive housing properties/programs.

Including the elderly, frail elderly, persons with disabilities (mental, physical, developmental), persons with alcohol or other drug addictions, persons with HIV/AIDS and their families, public housing residents and any other categories the jurisdiction may specify, and describe their supportive housing needs

The supportive housing needs of special needs populations in New Braunfels vary according to the population. In coming years, the needs of the elderly and frail elderly will increase as the over 65 year old population grows with the aging of the baby boom population. These needs may include nursing care facilities targeted to lower income households who cannot afford private nursing home care. Permanent supportive housing options for persons with mental, physical, and developmental disabilities may also become a pressing issue as persons with disabilities, who were previously cared for by parents lose those caregivers to death or incapacity. With healthcare systems enabling persons with disabilities to live longer, many are now outliving their caregivers; thus, increasing the demand for group housing that provides the care this population needs. The effects substance use disorders, mental illness, physical illness and HIV/AIDS affect the entire household. Many of these households are precariously housed and financial issues could result in homelessness.

Describe programs for ensuring that persons returning from mental and physical health institutions receive appropriate supportive housing

There are no supportive housing facilities in New Braunfels for persons returning from mental and physical health institutions. Agencies struggle to find appropriate housing options for people exiting from mental or physical institutions if a family member is not able to provide housing. The lack of supportive housing often means that the person must be relocated to Austin or San Antonio with the result of losing their support network.

Specify the activities that the jurisdiction plans to undertake during the next year to address the housing and supportive services needs identified in accordance with 91.215(e) with respect to persons who are not homeless but have other special needs. Link to one-year goals. 91.315(e)

Goals 1-8 - (HN) 1.1 – (NH) 1.5 & (HN) 1.7 in the PY20 Annual Action Plan will provide housing assistance to special needs persons and families through minor home repair, weatherization, aging in place program, homeownership assistance, rehabilitation of multi-family rental properties, and transitional housing.

Goals 7 – 11 (SLE) 2.2 – (SLE) 2.7 in the Annual Action Plan will provide supportive services to low-moderate income persons and special populations.

For entitlement/consortia grantees: Specify the activities that the jurisdiction plans to undertake during the next year to address the housing and supportive services needs identified in accordance with 91.215(e) with respect to persons who are not homeless but have other special needs. Link to one-year goals. (91.220(2))

During the next year, the City will use CDBG funds to support programs providing emergency rent and utility assistance, emergency food assistance, Meals on Wheels for homebound seniors, counseling, children's advocacy services and services for people with HIV/AIDS. The City provides assistance to special needs individuals and families through the Senior Center's Minor Home Repair Program and Comal County Habitat for Humanity's Weatherization and Aging in Place programs.

MA-40 Barriers to Affordable Housing – 91.210(e)

Negative Effects of Public Policies on Affordable Housing and Residential Investment

The negative effects on affordable housing and residential investment are primarily economy-driven and not public policy driven. The housing market drives the cost of housing and many of the low- to moderate-income residents are lacking the skills to secure higher incomes to make existing housing affordable in the open market. The housing in New Braunfels is relatively new with nearly half being built since 2000. There is also a relatively large percent of the housing (22%) that are at least 50 years old, posing economic burdens on the owners for repairs and rehabilitation. There are few apartment complexes inside the city limits and there is a shortage of units with less than three bedrooms. Two-thirds of the housing have three or more bedrooms, while more than three-fourths of the households are three persons or less, needing only a two bedroom or smaller. This is a primary barrier to affordable housing for smaller households as they are forced by the market to rent or purchase houses bigger than they need. HUD's Fair Market Rents have been increasing steadily over the past several years.

Within New Braunfels' city limits, there is little available land for residential development. Approximately three-fourths of the housing units in New Braunfels are single family and most of the available land is comprised of in-fill lots. Most of the single-family rentals are either high-end homes or housing within the city core, which is the location of the oldest homes and few amenities. Single family homes have the advantage of being larger than most multi-family units. However, they are generally more expensive to rent than large-scale apartments. Currently, there are only 2,675 (10.7%) multi-family units in structures of 10 or more units. The majority of the new multi-family and single-family rentals are southwest of New Braunfels in the suburbs of San Antonio. Proximity to San Antonio draws developers to build outside of New Braunfels in unincorporated areas that can easily serve San Antonio, New Braunfels, and Seguin. Taxes, building codes, permitting, zoning and other realities of incorporated areas makes development in unincorporated areas much less expensive, and more profitable if the areas can serve another even larger municipality in the metropolitan area. According to the HUD Community Assessment Reporting Tool, the median rents outside the city limits to the west and south are lower than inside, getting more expensive closer to San Antonio. New Braunfels' public policies related to residential construction are in line with the majority of Texas cities, regardless of population size. Municipalities have the legislative power to create ordinances to ensure the safety and well-being of its residents; powers that are very limited to non-existent for unincorporated areas. The city does have mobile home parks and manufactured home developments and the development ordinances developments do not put an undue burden on the developer or future residents.

Though the City acknowledges that there is a shortage of affordable rental housing, there is no remedy it can take to directly address the issue. The shortage of viable land for large-scale apartments and the cost for available parcels results in a market that does not support multi-family developers without a form of subsidy. The City does review and approve, when viable, Low Income Housing Tax Credit applications to the State of Texas. However, without HOME funding and a small CDBG allocation, the City does not have the ability to finance affordable housing by developers.

MA-45 Non-Housing Community Development Assets – 91.215 (f)

Introduction

Housing preferences are fulfilled by a household's ability to meet the financial needs of owning or renting their desired housing unit. The economic health of a community has a large impact on that ability through the job market, business activity, and the household's relative place in the economy determined by their level of education and employment status. The data below provide a look at where jobs and economic activity in New Braunfels provide employment opportunities and some descriptive consideration of education and employment levels.

Economic Development Market Analysis

Business Activity

Business by Sector	Number of Workers	Number of Jobs	Share of Workers %	Share of Jobs %	Jobs less workers %
Agriculture, Mining, Oil & Gas Extraction	638	44	3	0	-3
Arts, Entertainment, Accommodations	4,297	5,988	17	22	5
Construction	2,091	1,770	8	7	-1
Education and Health Care Services	4,350	5,457	18	20	2
Finance, Insurance, and Real Estate	1,516	980	6	4	-2
Information	486	175	2	1	-1
Manufacturing	2,298	1,497	9	6	-3
Other Services	953	960	4	4	0
Professional, Scientific, Management Services	1,858	1,649	7	6	-1
Public Administration	0	0	0	0	0
Retail Trade	4,012	5,907	16	22	6
Transportation and Warehousing	932	1,751	4	7	3
Wholesale Trade	1,421	702	6	3	-3
Total	24,852	26,880	--	--	--

Table 40 - Business Activity

Data 2011-2015 ACS (Workers), 2015 Longitudinal Employer-Household Dynamics (Jobs)
Source:

Labor Force

Total Population in the Civilian Labor Force	32,119
Civilian Employed Population 16 years and over	30,530
Unemployment Rate	4.95

Unemployment Rate for Ages 16-24	17.48
Unemployment Rate for Ages 25-65	3.07

Table 41 - Labor Force

Data Source: 2011-2015 ACS

Occupations by Sector	Number of People
Management, business and financial	6,625
Farming, fisheries and forestry occupations	860
Service	3,750
Sales and office	7,850
Construction, extraction, maintenance and repair	3,060
Production, transportation and material moving	2,135

Table 42 – Occupations by Sector

Data Source: 2011-2015 ACS

Travel Time

Travel Time	Number	Percentage
< 30 Minutes	19,270	68%
30-59 Minutes	6,550	23%
60 or More Minutes	2,520	9%
Total	28,340	100%

Table 43 - Travel Time

Data Source: 2011-2015 ACS

Education:

Educational Attainment by Employment Status (Population 16 and Older)

Educational Attainment	In Labor Force		Not in Labor Force
	Civilian Employed	Unemployed	
Less than high school graduate	2,190	25	900
High school graduate (includes equivalency)	6,170	280	1,715
Some college or Associate's degree	8,760	445	2,140
Bachelor's degree or higher	8,230	245	1,245

Table 44 - Educational Attainment by Employment Status

Data Source: 2011-2015 ACS

Educational Attainment by Age

	Age				
	18–24 yrs	25–34 yrs	35–44 yrs	45–65 yrs	65+ yrs
Less than 9th grade	69	310	385	1,020	970
9th to 12th grade, no diploma	710	255	620	539	530
High school graduate, GED, or alternative	2,235	2,215	1,810	4,150	2,759
Some college, no degree	1,680	3,140	2,165	3,235	1,610
Associate's degree	215	755	1,030	1,095	550
Bachelor's degree	510	2,280	2,105	2,955	1,584
Graduate or professional degree	15	630	684	1,095	750

Table 45 - Educational Attainment by Age

Data Source: 2011-2015 ACS

Educational Attainment – Median Earnings in the Past 12 Months

Educational Attainment	Median Earnings in the Past 12 Months
Less than high school graduate	80,755
High school graduate (includes equivalency)	151,983
Some college or Associate's degree	172,388
Bachelor's degree	197,705
Graduate or professional degree	327,957

Table 46 – Median Earnings in the Past 12 Months

Data Source: 2011-2015 ACS

Based on the Business Activity table above, what are the major employment sectors within your jurisdiction?

Based on the pre-populated chart above, the most active business sector in New Braunfels, in terms of the number of workers in the various industries, was Sales and Office workers with 32.34% of the workforce listed in the pre-populated chart, followed by Management, Business and Financial with 24.29%. The Service industry had 15.44% of all workers. That sector is followed by a Construction, Extraction, Maintenance and Repair at 12.60% of workers. Production, Transportation and Material Moving had 8.70% share of workers, followed by Farming, Fisheries and Forestry occupations at 3.54%.

Major Employers in New Braunfels and Comal County are Comal ISD School District, Schlitterbahn Waterpark, Wal-Mart Distribution Center, New Braunfels ISD, Comal County, Sysco and the City of New Braunfels.

Describe the workforce and infrastructure needs of the business community:

In the last 16 years, the workforce has increased by almost 85% and new primary jobs have more than doubled adding an average of 966 new jobs per year. Both the Civilian Labor Force and Employed base have steadily increased during this time.

There has been a growing and sustained need for more affordable housing in order for businesses to remain competitive and retain workers. The greatest increases in occupations have been in the management, business, financial sector and the service sector. Therefore, there is an increased need for employees with a bachelor's degree to fill the management, business and financial sector jobs. However, the health care and social assistance, administrative and waste services, retail trade and accommodating and food services industries are the county's largest employers. The prevalence of job growth in these industries creates continued demand for affordable housing due to the low hourly wage (\$11-\$14/hour) these industries generally pay.

Describe any major changes that may have an economic impact, such as planned local or regional public or private sector investments or initiatives that have affected or may affect job and business growth opportunities during the planning period. Describe any needs for workforce development, business support or infrastructure these changes may create.

The coronavirus global pandemic has decimated the tourism industry and New Braunfels has lost approximately 8,000 jobs in the first and second quarter of 2020 as unemployment jumped to over 12% for the first time. A significant portion of jobs and businesses in the city relies on a robust tourism industry. The community has a significant contingent of hospitality, accommodation and other industries that are supportive of the tourism industry at large. It is unclear if or how these jobs will return over the next 18-24 months and these impacts are already placing strain on the community's non-profits that try to assist residents with critical and urgent needs such as housing and food insecurity.

The major developments in the area that has and will continue to impact the labor market are:

\$110 million investment: Continental building plant in New Braunfels that will 550 employees at full operation. Approximately 400 of these positions are being transferred from the Seguin location with the company planning to add 100 new jobs in the community.

How do the skills and education of the current workforce correspond to employment opportunities in the jurisdiction?

The difficulty in analyzing the data is that New Braunfels is the employment center but much of the workforce is living in cities near New Braunfels and commuting to jobs in the City. Therefore, the number of jobs versus the number of qualified employees cannot be accurately determined when looking only within the city limits, for which the numbers are provided. Lower wage jobs and high-wage jobs are predominately located within the city. Taking the housing-to-job market into account, there is still a need for increased high school retention, access to GED preparation, vocational training, and affordable higher education in order to prepare the workforce in New Braunfels and the surrounding areas for the

expanding job market, particularly in the health care, education, and professional/scientific/management sectors.

Describe any current workforce training initiatives, including those supported by Workforce Investment Boards, community colleges and other organizations. Describe how these efforts will support the jurisdiction's Consolidated Plan.

Alamo Colleges District, works in partnership with New Braunfels Economic Development Corporation and Seguin Economic Development Corporation to bring Central Texas Technology Center (CTTC) to New Braunfels, Seguin and surrounding area residents.

This facility provides higher education and technical skills training to promote employment opportunities in high demand occupations including: Short-term workforce training programs that connect residents to emerging jobs in-demand occupations such as Certified Nursing Assistant, Medical Assistant, Industrial Maintenance/Mechatronics Technician, Welding Technology, OSHA training. Other programs offered are college academic core courses (humanities, math, and science), Information Technology, Medical Health Classes, vocational nursing, and ESL classes utilizing the contextual format through the Integrated Basic Education and Skills Training Program (I-BEST).

Howard Payne University – New Braunfels location – provides degree programs in business administration, criminal justice, general studies, master of business administration, master of Education in Sport and Wellness Leadership, Associate in Ministry and Christian Studies.

Wayland Baptist University- New Braunfels focuses on providing its students with a Bachelor of Science in Nursing in order to meet the growth in the area's health care industry and its resulting demand for trained employees.

Workforce Solutions provides a variety of educational and vocational programs and can customize trainings to meet the needs of a business or industry.

Does your jurisdiction participate in a Comprehensive Economic Development Strategy (CEDS)?

Yes

If so, what economic development initiatives are you undertaking that may be coordinated with the Consolidated Plan? If not, describe other local/regional plans or initiatives that impact economic growth.

The City and community at large was represented at the Alamo Area Council of Governments (AACOG) during the creation of the regional CEDS. The City's economic development entities completed a CEDS in 2017 and it continues to be the primary document to guide economic development activities.

The development of affordable housing was a specific goal from the City's CEDS. This economic development goal can be coordinated with the Consolidated Plan.

Discussion

The Greater New Braunfels Economic Development Foundation is a 501c3 non-profit created in 2005 in partnership with the City of New Braunfels, (via the New Braunfels Economic Development Corporation (NBEDC)) Comal County, New Braunfels Utilities and the Greater New Braunfels Chamber of Commerce work collaboratively under the name of the New Braunfels Economic Development Corporation to help achieve the goals for New Braunfels and Comal County.

MA-50 Needs and Market Analysis Discussion

Are there areas where households with multiple housing problems are concentrated? (include a definition of "concentration")

The maps and tables at the end of the section show that four of the six block groups in Census Tract 310401 have the highest concentration of problems with combination of more than 25% of occupied housing being 70 years old or older, high percent of low- to moderate-income households, and a high average housing cost burden.

Concentration of housing problems is defined in this section as a combination of several variables including greater than 10% of the housing built before 1950, more than 60% of households being low- to moderate-income, and an average of more than 60% of housing plus transportation cost burden for households at 50% AMI. These key factors also lead to other issues that can determine housing problems, such as deferred maintenance by home owners and landlords, limited desirability for the area which results in the lack of amenities and the proliferation of lenders with discriminatory practices.

Are there any areas in the jurisdiction where racial or ethnic minorities or low-income families are concentrated? (include a definition of "concentration")

Low-income concentration is defined as those block groups that are CDBG-eligible with more than 48.92% low- to moderate-income, with special consideration for those with 70% or more low- to moderate-income. The definition for concentration of minority populations is those block groups with 66% or more minorities.

The majority of the minority population in New Braunfels is Hispanic, with only 2.5% of total households being African American and 4% being Asian, Native American and Other. Hispanics comprise 27.1% of all households. All but one block group that comprises the CDBG Target Areas because of low-income concentration have at least 33% minority populations. The band between S IH-35 and Landa Street southwest of N. Live Oak, continuing northeast generally between W. San Antonio and Guadalupe River to the Comal County Fair Grounds is more than 66% minority and is the primary low- to moderate-income area. The maps and table at the end of this section show the block group data for minority households and the block level counts of Hispanic and African American residents. Other areas of high minority concentration are generally within block groups to the northwest and southeast with only a small portion inside the city limits. According to the HUD egis CPD maps, this is also the area with the highest concentration of housing built before 1950 and highest vacancy rates. The CPD maps also show that the area has the highest concentration of extremely low-income households with a severe housing cost burden (> 50% of income). Interestingly, the CPD maps show that the area has a low proportion of substandard housing (housing lacking complete plumbing and/or kitchen facilities).

What are the characteristics of the market in these areas/neighborhoods?

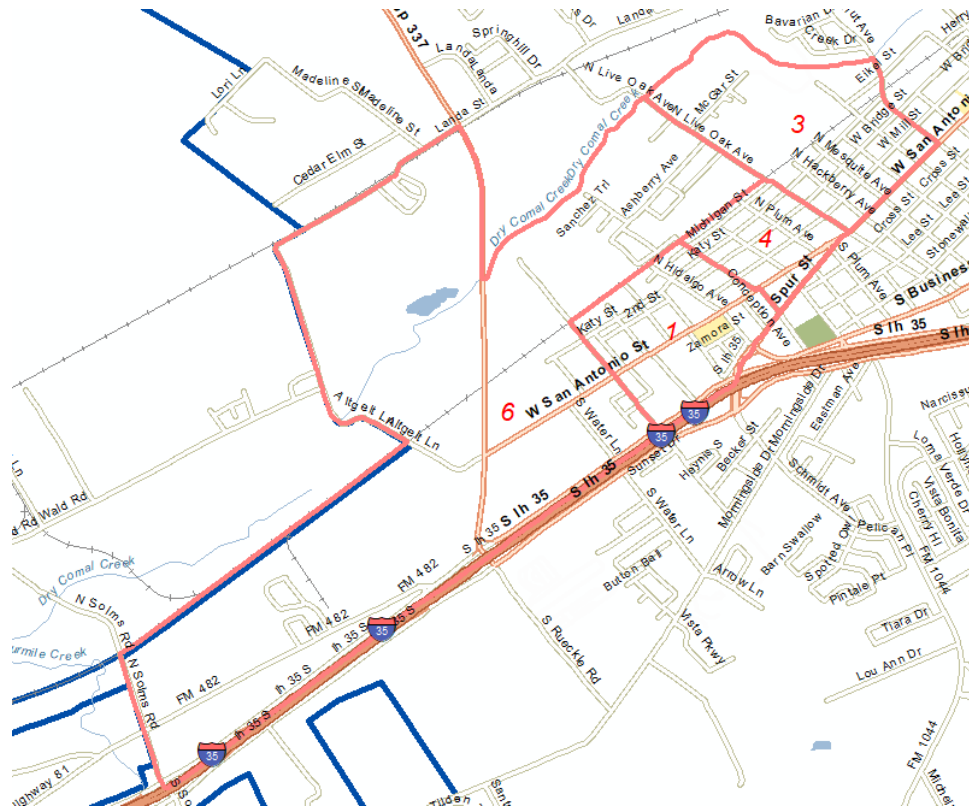
The area is predominately single family with an average of 25% of the units built before 1950. The newest and most rural block group (block group 6) of the area is predominately mobile homes. The other three areas are 82.1% to 96.6% single family. Given the high percentage of single family and mobile homes, the percent of renter-occupied is rather high. With the age of the housing stock, the lack of multi-family housing yet a significant number of rental properties, the area is in need of housing rehabilitation. Based on Home Mortgage Disclosure Act data, the average loan amount was \$106,911 with 45% for purchase, 46% for refinance, and 9% for home improvement. Nearly 25% of the loan applications were made to potentially problematic lenders and half of the denials were with these problem lenders. These are lenders with a high number of loans with no reason for denials given, high number of minority denials or denials in minority neighborhoods, and higher than normal loan: income ratios, indicating discriminatory practices.

Are there any community assets in these areas/neighborhoods?

There are a number of public parks in the area but no national or state grocery chains, pharmacies, big box stores, or medical facilities. Westside Community Center, a city-owned facility, is located in a low-moderate income neighborhood and provides educational and recreational programs for children, youth, adults and seniors as well as English as a Second language program and a branch library.

Are there other strategic opportunities in any of these areas?

The City through its Economic Development Department and in conjunction with the Greater New Braunfels Economic Development Foundation continue to discuss opportunities with local businesses and major chain businesses.



	Block Groups within CT 310401			
	1	3	4	6
Percent minority renter HH	100	58.7%	30.8%	94.1%
Percent minority total HH	97.2%	51.7%	90.4%	81.5%
Percent low-mod income	60%	63.8%	90.4%	78%
Average housing cost burden @ 50% AMI	31.6%	39.6%	32.1%	36%
Average rent cost burden 50% AMI	28.2%	44.5%	30.9%	32.1%
Average housing + transportation cost burden @ 50% AMI	60.1%	69.5%	62.6%	67.5%
Average rent + transportation cost burden @ 50% AMI	54.3%	71.9%	57.7%	61.5%
Owner Occupied	57.1%	60.7%	86.1%	67.5%
Renter Occupied	42.9%	39.3%	13.9%	32.5%
Single Family	82.1%	96.6%	90.4%	29.5%
2-9 Units	17.9%	3.4%	9.6%	0.0%
10+ Units	0.0%	0.0%	0.0%	0.0%
Mobile Home	0.0%	0.0%	0.0%	70.5%
Built before 1950	20.6%	23.5%	37.4%	8.8%
Median Year Built	1964	1963	1958	1996

MA-60 Broadband Needs of Housing occupied by Low- and Moderate-Income Households - 91.210(a)(4), 91.310(a)(2)

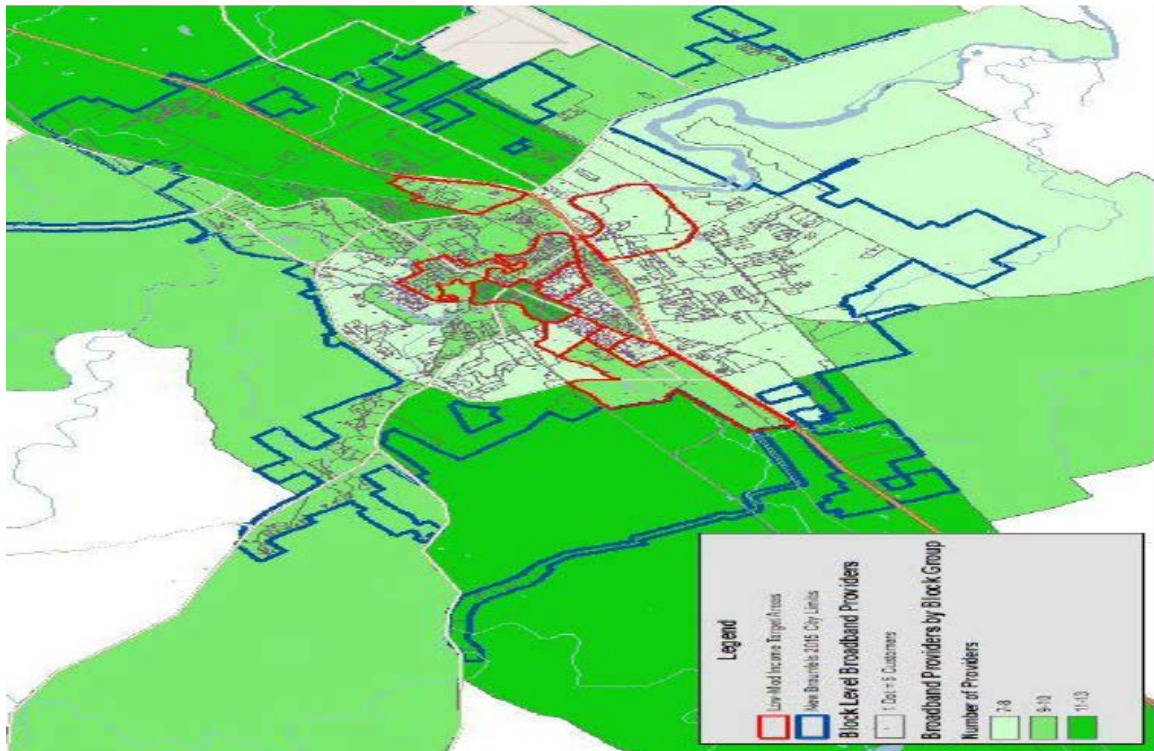
Describe the need for broadband wiring and connections for households, including low- and moderate-income households and neighborhoods.

All Census Block Groups in New Braunfels have at least three large national broadband providers, with all having at least seven total providers. There are approximately one dozen small local providers serving only a few blocks in a block group. The fringe areas of the city have more providers but less geographic coverage than the core areas.

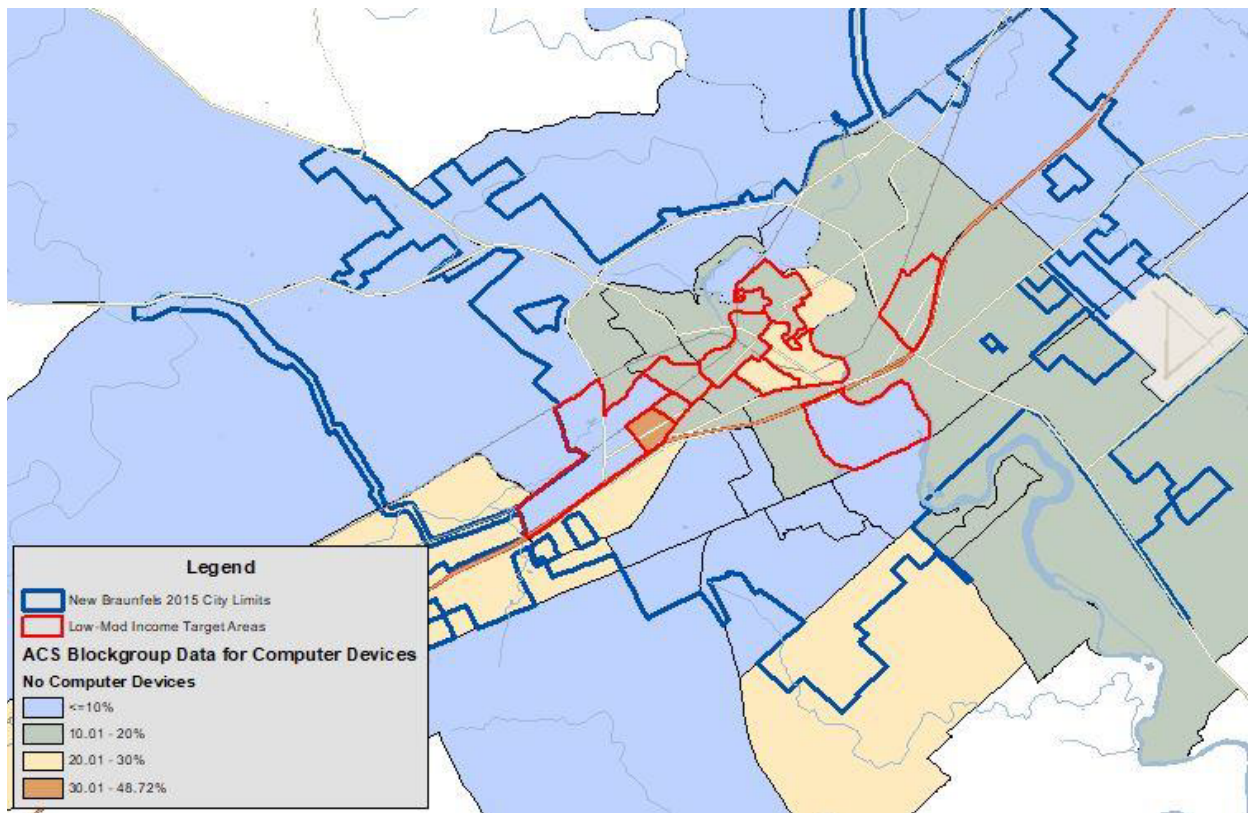
The problem in the area is the cost of fixed broadband service overall and the quality of service in the less densely populated areas. Block groups in most of the city, however, have at least 80% of the households with some form of computer device – computer, tablet, smart phone, and the like – according to the latest American Community Survey data. Within the low- to moderate-income target areas, one neighborhood has 51.28% without computer devices, and two block groups have between 20% and 30% without devices, though the fixed broadband data indicates that service is available providing the household has the equipment to access service.

Describe the need for increased competition by having more than one broadband Internet service provider serve the jurisdiction.

New Braunfels has no block groups in the city with less than seven providers and more than 90% of residential Census Blocks have at least three providers. The need is for more of the providers, particularly broadband internet services, to make the service affordable to low-income customers and for a program that will provide the necessary equipment, such as a smart phone or tablet, to those who cannot afford something. This is especially critical with disasters such as COVID-19 when households are homebound and need access to information and the ability to work or go to school remotely.



Map 6 - Fixed Broadband Development Data June 2018



Map 7 - ACS Data of Households without Internet Access

MA-65 Hazard Mitigation - 91.210(a)(5), 91.310(a)(3)

Describe the jurisdiction's increased natural hazard risks associated with climate change.

The New Braunfels-Comal County Hazard Mitigation plan was prepared and adopted with the primary purpose of identifying, assessing and reducing the long-term risk to life and property from hazard events. The key four elements of the plan are: 1) a risk assessment, 2) capability assessment, 3) mitigation strategy, and 4) plan maintenance procedures.

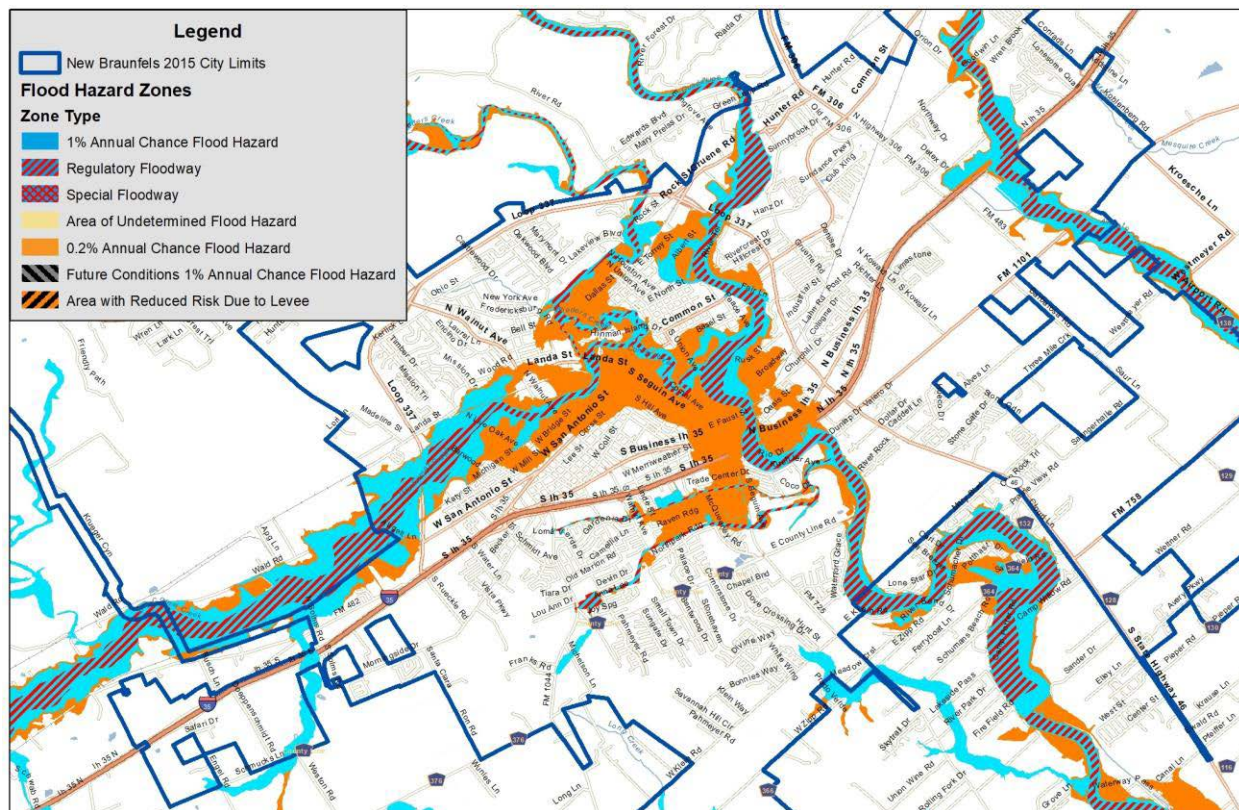
Upon a review of the full range of natural hazards suggested under the Federal Emergency Management Agency (FEMA) planning guidance, Comal County and the participating jurisdictions identified 11 natural hazards that are addressed in the Hazard Mitigation Action Plan. Of the hazards identified, 10 natural hazards and 1 quasi-technological hazard (dam failure) were identified as significant.

Natural Hazards and Climate Change Climate change is defined as a long-term hazard which can increase or decrease the risk of other weather hazards. It directly endangers property and biological organisms due to sea level rise and habitat destruction. Global climate change is expected to exacerbate the risks of certain types of natural hazards impacted by rising sea levels, warmer ocean temperatures, higher humidity, the possibility of stronger storms, and an increase in wind and flood damages due to storm surges. Texas is considered one of the more vulnerable states in the U.S. to both abrupt climate changes and to the impact of gradual climate changes to the natural and built environments. The methodologies utilized to develop the Risk Assessment are a historical analysis historical analysis and a statistical approach.

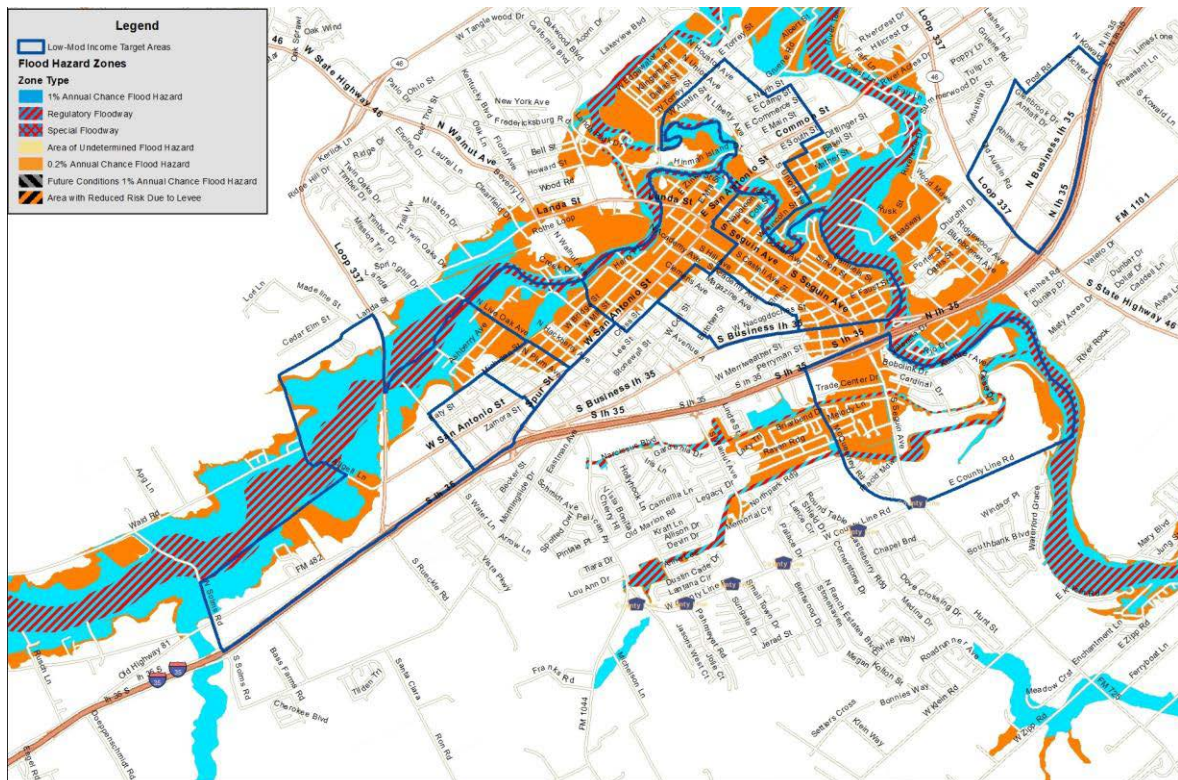
Both methodologies provide an estimate of potential impact by using a common, systematic framework for evaluation. Records retrieved from the National Centers for Environmental Information (NCEI) and National Oceanic and Atmospheric Administration (NOAA) were reported for the Comal County Planning Area, including the City of New Braunfels. Remaining records identifying the occurrence of hazard events in the planning area and the maximum recorded magnitude of each event were also evaluated. The use of geographic information system (GIS) technology to identify and assess risks for the Comal County planning area, and evaluate community assets and their vulnerability to the hazards. The four general parameters that are described for each hazard in the Risk Assessment include frequency of return, approximate annualized losses, a description of general vulnerability, and a statement of the hazard's impact. Frequency of return was calculated by dividing the number of events in the recorded time period for each hazard by the overall time period that the resource database was recording events.

Describe the vulnerability to these risks of housing occupied by low- and moderate-income households based on an analysis of data, findings, and methods.

The low-moderate income areas of New Braunfels are not located in significant flood zones and do not have an increased risk of flood damage. Homeowners are encouraged, if not required by the lender, to obtain flood insurance for their properties.



Map 8 - Flood Map of New Braunfels



Map 9 - Flood Map Zoomed in on Low-Moderate Income Areas

Strategic Plan

SP-05 Overview

Strategic Plan Overview

The Consolidated Plan creates the opportunity for strategic planning and citizen participation to take place in a comprehensive context. The Strategic Plan builds on local assets and coordinates a response to the needs of the community. It integrates economic, physical, environmental, community and human development in a comprehensive and coordinated plan so that the City and residents can work together to address the needs of the City's low-moderate income residents. A strategic plan also sets forth program goals, specific objectives, annual goals, and benchmarks for measuring progress.

The City must produce a strategic plan that outlines needs, priority needs, priorities, specific objectives, and strategies together in a comprehensive document. Citizen participation is an important part of the planning process. The COVID-19 stay-at-home orders prohibited the face to face meetings, focus group, interviews and neighborhood meetings that are usually held in order to solicit information. The City held a Stakeholders meeting, a public hearing to discuss the needs, priorities and gaps in service and a public hearing for comment on the draft Consolidated Plan. In addition, the City relied on relevant information from previous submissions and other reports and studies, as appropriate. The strategic plan was developed to achieve the following statutory goals for low and moderate income residents:

- provide decent housing and
- a suitable living environment and
- expand economic opportunities.

This Strategic Plan includes the following sections: Geographic priorities; Priority Needs; Influence of Market Conditions; Anticipated Resources; Institutional Delivery Structure; Goals; Public Housing; Barriers to Affordable Housing; Homelessness Strategy; Lead-based Paint Hazards; Anti-Poverty Strategy; and Monitoring.

SP-10 Geographic Priorities – 91.215 (a)(1)

Geographic Area

1	Area Name:	City Wide
	Area Type:	Low Mod Limited Clientele
	Other Target Area Description:	Low Mod Limited Clientele

Table 48 - Geographic Priority Areas

General Allocation Priorities

Describe the basis for allocating investments geographically within the jurisdiction (or within the EMSA for HOPWA)

The City does not allocate CDBG funds based on geographic areas. Funds are distributed throughout the city based on need. Because low-income, elderly, disabled, and special needs homeowners and renters reside throughout the city, housing assistance and supportive services are available citywide. Homeless persons and those facing potential homelessness also reside throughout the city making the need for shelter and housing a citywide activity. Services provided for the homeless population are located citywide to provide maximum accessibility.

Assistance for special needs populations (elderly people, disabled persons, persons with drug/alcohol addictions, persons with AIDS/HIV) is provided citywide, as these populations exist throughout the city. Public services (such as the Food Bank, emergency rent & utility assistance, CASA and Meals on Wheels) are also not limited geographically. These services are expected to be readily available and accessible to targeted audiences.

Public facilities and infrastructure improvements, such as park improvements, will be located in the relevant service areas of the city where 48.92% (HUD exception rate) or more of the population meets low- and moderate-income guidelines or where an organization's clients are at least 51% low to moderate income as defined by HUD.

Economic development activities are provided citywide (unless designated a spot slum/blighted location), recognizing that low-income individuals live throughout the city and that business location is often critical to its potential success.

Discussion

Because housing, as well as health and human needs are found throughout the community, allocation of program funds are available citywide. As noted above, low-income, elderly, disabled, and special needs homeowners and renters reside throughout the city, therefore housing assistance is available citywide.

Likewise, homeless persons and those facing potential homelessness also reside throughout the city making the need for shelter and housing a citywide activity and services provided for the homeless populations are located city-wide to provide maximum accessibility.

SP-25 Priority Needs - 91.215(a)(2)

Priority Needs

1	Priority Need Name	HOUSING NEEDS
	Priority Level	High
	Population	Extremely Low Low Moderate Large Families Families with Children Elderly Public Housing Residents Chronic Homelessness Individuals Families with Children Mentally Ill Chronic Substance Abuse veterans Persons with HIV/AIDS Victims of Domestic Violence Unaccompanied Youth Elderly Frail Elderly Persons with Mental Disabilities Persons with Physical Disabilities Persons with Developmental Disabilities Persons with Alcohol or Other Addictions Persons with HIV/AIDS and their Families Victims of Domestic Violence
	Geographic Areas Affected	Low Mod Limited Clientele
	Associated Goals	HOUSING NEEDS (HN) 1.1 HOUSING NEEDS (HN) 1.2 HOUSING NEEDS (HN) 1.3 HOUSING NEEDS (HN) 1.4 HOUSING NEEDS (HN) 1.5 HOUSING NEEDS (HN) 1.6 HOUSING NEEDS (HN) 1.7

	Description	<p>Maintain, rehabilitate and improve existing single-family owner occupied housing including accessibility improvements, minor home repairs and aging in place improvements.</p> <p>Increase availability, financial accessibility and support for affordable homeownership opportunities.</p> <p>Increase availability of emergency rent and utility assistance programs to enhance housing stability and prevent homelessness.</p> <p>Support the development of housing options for those experiencing homelessness including emergency shelter, transitional housing, rapid-rehousing, and permanent supportive housing.</p> <p>Support the development of a homeless shelter</p> <p>Support the development of transitional housing that enhance housing stability and promote self-sufficiency</p>
	Basis for Relative Priority	Priorities were determined through a public participation process including stakeholders, city staff, foundations and funders, and New Braunfels residents as well as an evaluation of the community needs survey.
	2	
	Priority Need Name	PUBLIC FACILITIES & INFRASTRUCTURE
	Priority Level	Low

	Population	Extremely Low Low Moderate Large Families Families with Children Elderly Chronic Homelessness Individuals Families with Children Mentally Ill Chronic Substance Abuse veterans Persons with HIV/AIDS Victims of Domestic Violence Elderly Frail Elderly Persons with Mental Disabilities Persons with Physical Disabilities Persons with Developmental Disabilities Persons with Alcohol or Other Addictions Persons with HIV/AIDS and their Families Victims of Domestic Violence
	Geographic Areas Affected	Low Mod Limited Clientele
	Associated Goals	PUBLIC FACILITIES (SLE) 2.1 PUBLIC FACILITIES (SLE) 2.2
	Description	Provide suitable living environments by: Support the improvements and development of city-owned parks in low to moderate income areas Support the improvements of community centers, public facilities, and infrastructure improvements in low to moderate income areas
	Basis for Relative Priority	Priorities were determined through a public participation process including stakeholders, city staff, foundations and funders, and New Braunfels residents as well as an evaluation of the community needs survey.
3	Priority Need Name	PUBLIC SERVICES
	Priority Level	High

	Population	Extremely Low Low Moderate Large Families Families with Children Elderly Public Housing Residents Chronic Homelessness Individuals Families with Children Mentally Ill Chronic Substance Abuse veterans Persons with HIV/AIDS Victims of Domestic Violence Unaccompanied Youth Elderly Frail Elderly Persons with Mental Disabilities Persons with Physical Disabilities Persons with Developmental Disabilities Persons with Alcohol or Other Addictions Persons with HIV/AIDS and their Families Victims of Domestic Violence Non-housing Community Development
	Geographic Areas Affected	Low Mod Limited Clientele
	Associated Goals	PUBLIC SERVICES (SLE) 2.6 PUBLIC SERVICES (SLE) 2.7 PUBLIC SERVICES (SLE) 2.8 PUBLIC SERVICES (SLE) 2.9 PUBLIC SERVICES (SLE) 2.10 PUBLIC SERVICES (SLE) 2.11 PUBLIC SERVICES (SLE) 2.12 PUBLIC SERVICES (SLE) 2.13

	Description	<p>Public services (supportive services) that enhance and support the needs of low-moderate New Braunfels residents.</p> <p>Support homebound meal delivery services to elderly and/or disabled residents</p> <p>Support emergency rent and utility assistance to prevent eviction and homelessness</p> <p>Support mental health services including individual and group counseling</p> <p>Support case management and services to people diagnosed with HIV or AIDS</p> <p>Support advocacy and services for abused and/or neglected children</p> <p>Support the efforts of food banks to provide emergency food distribution</p> <p>Support the development of transportation assistance programs</p> <p>Support children and youth programs</p> <p>Support programs that provide case management and services at local emergency shelters</p>
	Basis for Relative Priority	Priorities were determined through a public participation process including stakeholders, city staff, foundations and funders, and New Braunfels residents as well as an evaluation of the community needs survey.
	4	
	Priority Need Name	ECONOMIC DEVELOPMENT
	Priority Level	Low
	Population	<p>Extremely Low</p> <p>Low</p> <p>Moderate</p> <p>Large Families</p> <p>Families with Children</p> <p>Elderly</p> <p>Public Housing Residents</p> <p>Individuals</p> <p>Families with Children</p> <p>Persons with Mental Disabilities</p> <p>Persons with Physical Disabilities</p> <p>Persons with HIV/AIDS and their Families</p> <p>Victims of Domestic Violence</p> <p>Non-housing Community Development</p>

	Geographic Areas Affected	Low Mod Limited Clientele
	Associated Goals	ECONOMIC DEVELOPMENT (ED) 3.1 ECONOMIC DEVELOPMENT (ED) 3.2
	Description	Support the development of programs to assists businesses affected by natural and/or manmade events. Support the development of programs that assist with job retention and job creation at businesses affected by natural and/or manmade events.
	Basis for Relative Priority	Priorities were determined through a public participation process including stakeholders, city staff, foundations and funders, and New Braunfels residents as well as an evaluation of the community needs survey.
5	Priority Need Name	DEMOLITION ACTIVITIES
	Priority Level	Low
	Population	Extremely Low Low Moderate Large Families Families with Children Elderly Public Housing Residents Individuals Families with Children Elderly Persons with Mental Disabilities Persons with Physical Disabilities Persons with Developmental Disabilities Persons with HIV/AIDS and their Families Victims of Domestic Violence
	Geographic Areas Affected	Low Mod Limited Clientele
	Associated Goals	DEMOLITION ACTIVITIES (DA) 4.1
	Description	Support demolition of condemned or substandard buildings provided that all CDBG regulations are met including one-on-one housing replacement.

	Basis for Relative Priority	Priorities were determined through a public participation process including stakeholders, city staff, foundations and funders, and New Braunfels residents as well as an evaluation of the community needs survey.
6	Priority Need Name	ADMINISTRATION
	Priority Level	High
	Population	Other
	Geographic Areas Affected	Low Mod Limited Clientele
	Associated Goals	ADMINISTRATION (AD) 5.1
	Description	Provide program management and oversight of the CDBG program including Fair Housing activities.
	Basis for Relative Priority	Administration was determined to be a high priority by City staff as the CDBG program cannot exist with management and oversight. Fair Housing activities are a requirement for all CDBG programs.

Table 49 – Priority Needs Summary

Narrative (Optional)

The 2020-2024 Priority Needs listed above reflect needs identified through a public participation process, previous Plans and information from reliable data sources. The City's continued rapid growth has increased the need and demand for affordable housing and public services.

SP-30 Influence of Market Conditions – 91.215 (b)

Influence of Market Conditions

Affordable Housing Type	Market Characteristics that will influence the use of funds available for housing type
Tenant Based Rental Assistance (TBRA)	The City of New Braunfels does not have any TBRA programs other than the Housing Choice Voucher program managed by the New Braunfels Housing Authority. The use of a HCV is dependent on rental property owners' willingness to rent their units to voucher holders. Landlords can be reluctant to rent to these tenants due to the reputation they have that the tenants do not take care of the property as well as other renters. Other market conditions that influence the use of HCVs is that rental rates often exceed the Fair Market Rents (FMR) set by HUD. If rents are too high, the FMR might not be enough to allow clients to lease the units, even if the landlord was willing.
TBRA for Non-Homeless Special Needs	Added to the description of TBRA market characteristics above, non-homeless special needs clients may also encounter housing units that do not meet their accessibility needs. Most housing in any community has not had accessibility improvements that allow persons with mobility issues ease of access. While landlords are obligated to make reasonable accommodations for such renters, many need more accommodations than typical landlords would consider reasonable. Additionally, landlords are often hesitant to rent to persons recently released from incarceration or victims of domestic violence being concerned of illegal activity or violence on their properties.
New Unit Production	The production of new housing units is influenced by several market conditions, including the cost of land, the cost of construction, and prevailing interest rates. In many areas lenders are not making new loans as freely as before and some well qualified buyers are finding it difficult to navigate the new mortgage processes that have been instituted. The resulting delays in securing loans can burden housing developers and restrict their activities.
Rehabilitation	Rehabilitation activities can be influenced by the cost of materials and labor. The efficiency of rehabilitation is dependent on the after rehabilitation value of the home. If the market value of the home does not support the extent of rehabilitation required, market financing may not be feasible without substantial equity investment by the owner or through grant funding being used to repair the home.

Affordable Housing Type	Market Characteristics that will influence the use of funds available for housing type
Acquisition, including preservation	Acquisition, including preservation, can be influenced by the market value of the structure. With home purchases by private individuals, the historic low interest rates off-set increases in the market value of the housing stock. Monthly housing costs of higher priced homes at lower interest rates approximate the monthly housing costs of lower priced homes at higher interest rates. In the case of a City or non-profit organization buying housing stock for rehabilitation and resale or for preservation, the costs of purchasing a home outright at higher prices can reduce the number of homes that can be purchased or reduce the funds available for rehabilitation activities.

SP-35 Anticipated Resources - 91.215(a) (4), 91.220(c) (1, 2)

Introduction

The City of New Braunfels bases the anticipated CDBG resources for the 2020 - 2024 Consolidated Plan based on the PY20 grant of \$413,251.

Anticipated Resources

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
CDBG	public - federal	Acquisition Admin and Planning Economic Development Housing Public Improvements Public Services	413,251	0	70,996	484,247	1,653,074	Expected amount for remainder of Con Plan based on PY20 allocation

Table 47 - Anticipated Resources

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

Subrecipients of CDBG funding from the City of New Braunfels are expected to leverage the CDBG funds with other private, state or local funds. This information is built into applications for funding and taken into consideration when funding recommendations are made by the Community Development Advisory Committee to City Council. CDBG does not require matching funds. When CDBG funds are used for city projects such as parks, community centers and infrastructure improvements, these projects are generally funded from other resources also such as the general fund or other grant funds.

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

The City of New Braunfels has used and will continue to use CDBG funding for park and public facilities in low-mod areas to improve the quality of life for residents.

Discussion

City general funds and other state and federal funds are used to support city projects in which CDBG funds are proposed and are also the sole funding source for some projects located in low-moderate income areas of the City.

SP-40 Institutional Delivery Structure – 91.215(k)

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

Responsible Entity	Responsible Entity Type	Role	Geographic Area Served
City of New Braunfels	Government	Economic Development Homelessness Non-homeless special needs Ownership Planning Rental neighborhood improvements public facilities public services	Other

Table 48 - Institutional Delivery Structure

Assess of Strengths and Gaps in the Institutional Delivery System

The institutional delivery system in New Braunfels is well coordinated and spans a range of community needs. The City will continue to make entitlement funds available to non-profits, city departments, and other eligible entities through a competitive grant process or a City Council directed process to fund eligible supportive service activities and agencies.

The City provides subrecipient training during the application phase, prior to the execution of Subrecipient Agreements and is available for technical assistance, if needed. The City distributes updated information on CDBG funded programs to subrecipients when appropriate. The City maintains the Community Development Block Grant webpage with up-to-date information as a resource for other city departments, general public and service/housing providers. The City is committed to meeting regularly with interested citizens and stakeholders to discuss community development issues. The City recognizes the need to provide increased outreach to minority and non-English speaking residents. In an effort to reach these populations, the City will hold public hearings and community meetings at the Westside Community Center and churches or facilities located in low-moderate income areas.

Availability of services targeted to homeless persons and persons with HIV and mainstream services

Homelessness Prevention Services	Available in the Community	Targeted to Homeless	Targeted to People with HIV
Homelessness Prevention Services			
Counseling/Advocacy	X		X
Legal Assistance	X		
Mortgage Assistance	X		
Rental Assistance	X		
Utilities Assistance	X		
Street Outreach Services			
Law Enforcement	X		
Mobile Clinics	X		
Other Street Outreach Services			
Supportive Services			
Alcohol & Drug Abuse	X		
Child Care	X		
Education	X		
Employment and Employment Training	X		
Healthcare	X		
HIV/AIDS	X		X
Life Skills	X		
Mental Health Counseling			
Transportation	X		
Other			

Table 49 - Homeless Prevention Services Summary

Describe how the service delivery system including, but not limited to, the services listed above meet the needs of homeless persons (particularly chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth)

The services targeted to homeless persons and persons with HIV/AIDS and mainstream services are made available through the coordination of services provided by the array of non-profit service providers in the City of New Braunfels. These organizations partner with each other, the City, and mainstream service providers to provide a wide ranging response to the service needs of homeless persons and persons with HIV/AIDS, special populations, veterans, individuals, families with children, veterans and their families, and unaccompanied youth.

Describe the strengths and gaps of the service delivery system for special needs population and persons experiencing homelessness, including, but not limited to, the services listed above

The main strength of the service delivery system is the collaboration and cooperation between the City and the service providers allowing for a flow of information and funding. The City is able to rely on service providers to continue to provide services, seek additional funding and expand programs. The main gap is the lack of affordable housing, a general homeless shelter, transitional housing, rapid re-housing and permanent supportive housing within New Braunfels. Other gaps include that the need for services and housing are greater than the programs and funding available and some agencies lack the capacity to expand their programs and/or staff. Other gaps in service include:

- Limited Mainstream Resources – many homeless individuals and families do not stay in the area long enough to determine eligibility for services;
- Lack of permanent affordable housing and the lengthy waiting list for public housing and the Housing Choice Voucher program;
- Limited access to medical and dental care for those experiencing homelessness
- Lack of public transportation to allow for travel to work, medical appointments and shopping

Provide a summary of the strategy for overcoming gaps in the institutional structure and service delivery system for carrying out a strategy to address priority needs

The City is working with local agencies and foundations to enhance the delivery so services and housing. Strategies include:

- Continue collaboration and cooperation with non-profit organizations to identify and address community needs
- Identify opportunities to create private/public partnerships for project finance and development to leverage federal funds.
- Support the strategies and actions recommended by the Workforce Housing Advisory Committee
- Support the development of an emergency shelter, transitional housing, rapid re-housing programs and permanent supportive housing.

SP-45 Goals Summary – 91.215(a)(4)

Goals Summary Information – Table 53

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
1	HOUSING NEEDS (HN) 1.1	2020	2024	Affordable Housing	City Wide	HOUSING NEEDS	CDBG: \$75,000	Direct Financial Assistance to Homebuyers: 25 Households Assisted
2	HOUSING NEEDS (HN) 1.2	2020	2024	Affordable Housing	City Wide	HOUSING NEEDS	CDBG: \$260,000	Homeowner Housing Rehabilitated: 20 Household Housing Unit
3	HOUSING NEEDS (HN) 1.3	2020	2024	Affordable Housing	City Wide	HOUSING NEEDS	CDBG: \$85,445	Homeowner Housing Rehabilitated: 20 Household Housing Unit
4	HOUSING NEEDS (HN) 1.4	2020	2024	Affordable Housing	City Wide	HOUSING NEEDS	CDBG: \$85,000	Homeowner Housing Rehabilitated: 30 Household Housing Unit
5	HOUSING NEEDS (HN) 1.5	2020	2024	Affordable Housing	City Wide	HOUSING NEEDS	CDBG: \$506,205	Rental units rehabilitated: 50 Household Housing Unit
6	HOUSING NEEDS (HN) 1.6	2020	2024	Homeless	City Wide	HOUSING NEEDS	CDBG: \$0	Overnight/Emergency Shelter/Transitional Housing Beds added: 1 Beds
7	HOUSING NEEDS (HN) 1.7	2020	2024	Homeless	City Wide	HOUSING NEEDS	CDBG: \$150,000	Overnight/Emergency Shelter/Transitional Housing Beds added: 48 Beds

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
8	PUBLIC FACILITIES (SLE) 2.1	2020	2024	Non-Housing Community Development	City Wide	PUBLIC FACILITIES & INFRASTRUCTURE	CDBG: \$250,000	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 1 Persons Assisted
9	PUBLIC FACILITIES (SLE) 2.2	2020	2024	Non-Housing Community Development	City Wide	PUBLIC FACILITIES & INFRASTRUCTURE	CDBG: \$0	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 1 Persons Assisted
10	PUBLIC SERVICES (SLE) 2.6	2020	2024	Non-Housing Community Development	City Wide	PUBLIC SERVICES	CDBG: \$45,000	Public service activities other than Low/Moderate Income Housing Benefit: 175 Persons Assisted
11	PUBLIC SERVICES (SLE) 2.7	2020	2024	Non-Housing Community Development	City Wide	PUBLIC SERVICES	CDBG: \$45,000	Public service activities other than Low/Moderate Income Housing Benefit: 100 Persons Assisted
12	PUBLIC SERVICES (SLE) 2.8	2020	2024	Non-Housing Community Development	City Wide	PUBLIC SERVICES	CDBG: \$40,000	Public service activities other than Low/Moderate Income Housing Benefit: 100 Persons Assisted
13	PUBLIC SERVICES (SLE) 2.9	2020	2024	Non-Housing Community Development	City Wide	PUBLIC SERVICES	CDBG: \$35,000	Public service activities other than Low/Moderate Income Housing Benefit: 25 Persons Assisted

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
14	PUBLIC SERVICES (SLE) 2.10	2020	2024	Non-Housing Community Development	City Wide	PUBLIC SERVICES	CDBG: \$71,002	Public service activities other than Low/Moderate Income Housing Benefit: 600 Persons Assisted
15	PUBLIC SERVICES (SLE) 2.11	2020	2024	Non-Housing Community Development	City Wide	PUBLIC SERVICES	CDBG: \$75,000	Public service activities other than Low/Moderate Income Housing Benefit: 1125 Persons Assisted
16	PUBLIC SERVICES (SLE) 2.12	2020	2024	Non-Housing Community Development	City Wide	PUBLIC SERVICES	CDBG: \$0	Public service activities other than Low/Moderate Income Housing Benefit: 1 Persons Assisted
17	PUBLIC SERVICES (SLE) 2.13	2020	2024	Non-Housing Community Development	City Wide	PUBLIC SERVICES	CDBG: \$0	Public service activities other than Low/Moderate Income Housing Benefit: 1 Persons Assisted
18	ECONOMIC DEVELOPMENT (ED) 3.1	2020	2024	Non-Housing Community Development	City Wide	ECONOMIC DEVELOPMENT	CDBG: \$0	Jobs created/retained: 1 Jobs
19	ECONOMIC DEVELOPMENT (ED) 3.2	2020	2024	Non-Housing Community Development	City Wide	ECONOMIC DEVELOPMENT	CDBG: \$0	Businesses assisted: 1 Businesses Assisted
20	DEMOLITION ACTIVITIES (DA) 4.1	2020	2024	Non-Housing Community Development	City Wide	DEMOLITION ACTIVITIES	CDBG: \$0	Buildings Demolished: 1 Buildings
21	ADMINISTRATION (AD) 5.1	2020	2024	Non-Housing Community Development	City Wide	ADMINISTRATION	CDBG: \$414,669	Other: 250 Other

Goal Descriptions

1	Goal Name	HOUSING NEEDS (HN) 1.1
	Goal Description	Homebuyer assistance including down payment and closing costs assistance to first-time homebuyers.
2	Goal Name	HOUSING NEEDS (HN) 1.2
	Goal Description	Minor home repairs and accessibility improvements to low-moderate elderly and/or disabled homeowners.
3	Goal Name	HOUSING NEEDS (HN) 1.3
	Goal Description	Minor home repairs including Aging in Place repairs and accessibility improvements for low-moderate income homeowners.
4	Goal Name	HOUSING NEEDS (HN) 1.4
	Goal Description	Weatherization repairs and improvements for low-moderate income homeowners.
5	Goal Name	HOUSING NEEDS (HN) 1.5
	Goal Description	Repairs for subsidized rental multi-family properties in New Braunfels for low-moderate income tenants.
6	Goal Name	HOUSING NEEDS (HN) 1.6
	Goal Description	Support the development of a homeless shelter. No CDBG funds are allocated for this project in PY20. CDBG funding will be considered for the remaining Con Plan years if projects develop and there is funding available.
7	Goal Name	HOUSING NEEDS (HN) 1.7
	Goal Description	Funding for the development of transitional housing and/or permanent supportive housing for people experiencing homelessness.

8	Goal Name	PUBLIC FACILITIES (SLE) 2.1
	Goal Description	Funding for improvements and/or development of city-owned parks, community centers and facilities owned by other entities that serve low-moderate income people.
9	Goal Name	PUBLIC FACILITIES (SLE) 2.2
	Goal Description	Public facilities and infrastructure improvements. No funding is allocated for PY20. CDBG funding will be considered for the remaining years of the Con Plan if projects develop and there is funding available.
10	Goal Name	PUBLIC SERVICES (SLE) 2.6
	Goal Description	Services to senior citizens including Meals on Wheels, on-site congregate meals, educational, recreational and social activities.
11	Goal Name	PUBLIC SERVICES (SLE) 2.7
	Goal Description	Homeless prevention activities including emergency rent and utility assistance to low-moderate income households.
12	Goal Name	PUBLIC SERVICES (SLE) 2.8
	Goal Description	Mental health services including individual counseling, group counseling and peer support for low-moderate income New Braunfels residents.
13	Goal Name	PUBLIC SERVICES (SLE) 2.9
	Goal Description	Case management, housing and services to persons with HIV and AIDS using a holistic approach.
14	Goal Name	PUBLIC SERVICES (SLE) 2.10
	Goal Description	Advocacy and services for abused and/or neglected children that are in the child welfare, foster care and/or court system.
15	Goal Name	PUBLIC SERVICES (SLE) 2.11
	Goal Description	Food and non-food assistance to low-moderate income individuals and families who are experiencing food insecurity.

16	Goal Name	PUBLIC SERVICES (SLE) 2.12
	Goal Description	Support children and youth services including day care, afterschool programs, and summer programs. No CDBG funds are allocated for PY20. CDBG funding will be considered for the remaining years of the Con Plan if projects develop and there is funding available.
17	Goal Name	PUBLIC SERVICES (SLE) 2.13
	Goal Description	Support transportation services such as purchased bus passes and vouchers. No CDBG funds are allocated for this activity in PY20. CDBG funding will be considered during the remaining Con Plan years if projects develop and there is funding available.
18	Goal Name	ECONOMIC DEVELOPMENT (ED) 3.1
	Goal Description	Provide assistance to businesses affected by natural and/or manmade events. No CDBG funds are allocated for PY20. CDBG funding will be considered if projects develop and there is funding available.
19	Goal Name	ECONOMIC DEVELOPMENT (ED) 3.2
	Goal Description	Support Jobs created- jobs retained for businesses affected by natural and/or manmade events. No CDBG funds are allocated for this goal during PY20. CDBG funding will be considered for remaining Con Plan years if projects develop and there is funding available.
20	Goal Name	DEMOLITION ACTIVITIES (DA) 4.1
	Goal Description	Support demolition of condemned or substandard buildings provided that all CDBG regulations are met including one-on-one housing replacement. No CDBG funding is allocated for PY20. CDBG funding will be considered for the remaining years of the Con Plan if projects develop and there is funding available.
21	Goal Name	ADMINISTRATION (AD) 5.1
	Goal Description	Administration and oversight of the CDBG program including Fair Housing activities.

Table 54 – Goals Summary

Estimate the number of extremely low-income, low-income, and moderate-income families to whom the jurisdiction will provide affordable housing as defined by HOME 91.315(b)(2)

The City is not a recipient of HOME funds. During PY20 through PY24, the City will use CDBG to fund down payment and closing costs assistance for 25 first-time homebuyers. The Minor Home Repair, Weatherization, and Aging in Place programs will provide assistance to 100 homeowners some whom are elderly and/or disabled. Eligible applicants must be low and moderate-income at 80% or below the median income citywide.

SP-50 Public Housing Accessibility and Involvement – 91.215(c)

Need to Increase the Number of Accessible Units (if Required by a Section 504 Voluntary Compliance Agreement)

The New Braunfels Housing Authority is in compliance with federal regulations for accessible units with at least 5% of the units at each property being accessible. All newly constructed properties will meet federal requirements for accessible units. At this time there is a sufficient number of accessible units within the two properties for current residents. There is a shortage of rental units that are accessible for the Housing Choice Voucher holders and landlords are often unwilling to make accessibility improvements to accommodate the needs of disabled tenants.

Activities to Increase Resident Involvements

New Braunfels Housing Authority encourages the residents to be more involved in Resident Council meetings by providing the residents the opportunity to learn about the activities, security, modernization projects and management issues and provide input and feedback. The City plans work more closely with the housing authority as the City further develops their Workforce Housing efforts.

The City will continue to support efforts to coordinate the work of social service organizations that provide services, housing assistance and homeownership opportunities to public housing residents. Comal County Habitat for Humanity holds regular information sessions and application assistance for public housing residents for the agency's homeownership program. The City has supported Habitat's efforts by providing CDBG closing costs assistance for the past five years and will be providing \$11,550 in PY20 for down payment and closing costs assistance.

Is the public housing agency designated as troubled under 24 CFR part 902?

The New Braunfels Housing Authority is not designated as a troubled public housing agency.

Plan to remove the 'troubled' designation N/A

SP-55 Barriers to affordable housing – 91.215(h)

Barriers to Affordable Housing

The negative effects on affordable housing and residential investment are primarily economy-driven and not public policy driven. The housing market drives the cost of housing and many of the low- to moderate-income residents are lacking the skills to secure higher incomes to make existing housing affordable in the open market. The housing in New Braunfels is relatively new with nearly half being built since 2000. There is also a relatively large percent of the housing (22%) that are at least 50 years old, posing economic burdens on the owners for repairs and rehabilitation. There are few apartment complexes inside the city limits and there is a shortage of units with less than three bedrooms. Two-thirds of the housing have three or more bedrooms, while more than three-fourths of the households are three persons or less, needing only a two bedroom or smaller. This is a primary barrier to affordable housing for smaller households as they are forced by the market to rent or purchase houses bigger than they need. HUD's Fair Market Rents have been increasing steadily over the past several years.

Within New Braunfels' city limits, there is little available land for residential development. Approximately three-fourths of the housing units in New Braunfels are single family and most of the available land is comprised of in-fill lots. Most of the single-family rentals are either high-end homes or housing within the city core, which is the location of the oldest homes and few amenities. Single family homes have the advantage of being larger than most multi-family units. However, they are generally more expensive to rent than large-scale apartments. Currently, there are only 2,675 (10.7%) multi-family units in structures of 10 or more units. The majority of the new multi-family and single-family rentals are southwest of New Braunfels in the suburbs of San Antonio. Proximity to San Antonio draws developers to build outside of New Braunfels in unincorporated areas that can easily serve San Antonio, New Braunfels, and Seguin. Taxes, building codes, permitting, zoning and other realities of incorporated areas makes development in unincorporated areas much less expensive, and more profitable if the areas can serve another even larger municipality in the metropolitan area. According to the HUD Community Assessment Reporting Tool, the median rents outside the city limits to the west and south are lower than inside, getting more expensive closer to San Antonio. New Braunfels' public policies related to residential construction are in line with the majority of Texas cities, regardless of population size. Municipalities have the legislative power to create ordinances to ensure the safety and well-being of its residents; powers that are very limited to non-existent for unincorporated areas. The city does have mobile home parks and manufactured home developments and the development ordinances developments do not put an undue burden on the developer or future residents.

Though the City acknowledges that there is a shortage of affordable rental housing, there is no remedy it can take to directly address the issue. The shortage of viable land for large-scale apartments and the cost for available parcels results in a market that does not support multi-family developers without a form of subsidy. The City does review and approve, when viable, Low Income Housing Tax Credit applications to the State of Texas. However, without HOME funding and a small CDBG allocation, the City does not have the ability to finance affordable housing by developers.

Barriers for renters that negatively affect affordable housing: long waiting lists for public housing and the HCV program, lack of affordable housing that will meet Housing Quality Standards; high cost of rent; income requirements; poor rental and credit history; and inability of residents to afford rent deposits and utility deposits.

Barriers for homebuyers include:

- Insufficient funds for down payment - Private lending institutions typically require home purchasers to provide 10% to 20% of a home's value as a down payment. Many low-income households are already rent burdened, paying as high as 40% to 50% of their income for housing. Such high costs for current shelter preclude these low-income households from accumulating the funds for a down payment.
- High existing debt of prospective purchasers - Many low-income households also are saddled with excessively high existing debt for such items as credit accounts, car payments, and medical expenses that prevent obtaining private lender financing.
- Need for property repairs - The homes most affordable to low-income households tend to be located in neighborhoods where property has been poorly maintained and requires repair. Therefore, low-income purchasers often confront the prospect of obtaining a home that will require further financial investment for property improvements. Complicating the situation further is the reality that such affordable housing is often located in neighborhoods where money invested in property improvements does not necessarily translate into a corresponding increase in the value of the property.
- Lack of credit - Many low-income homebuyers have no credit record because they pay most of their expenses in cash.
- Poor credit - A very common barrier to home ownership is a blemished credit record. Unfavorable credit information can stay on a credit record for up to seven years and bankruptcy records stay on the report for 10 years.
- Low number of available jobs for those without a higher education or vocational skills that pay a living wage.

Strategy to Remove or Ameliorate the Barriers to Affordable Housing

The City of New Braunfels' policies are reasonable and the development regulation process generally runs smoothly. City staff is available to assist developers. As specific projects are proposed, the City will review the project for its compliance with existing local laws and regulations. If a local law or regulation should prove to have a negative impact on a proposed affordable housing program or project, such law or regulation would be reviewed to determine its viability. More detailed information can be found at AP-55.

SP-60 Homelessness Strategy – 91.215(d)

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

With a focus on homeless prevention, the City and local service providers have identified the provision of direct assistance with rent and utilities as well as supportive services to help those potentially at risk of becoming homeless as the key priorities. The Comal County Homeless Coalition is part of the Texas Balance of State Continuum of Care that is managed by the Texas Homeless Network (THN), a statewide nonprofit agency.

The Comal County Homeless Coalition meets monthly to discuss issues and challenges in meeting the needs of those experiencing homelessness or at-risk of homelessness. Members of the Coalition represent service and housing providers, public housing staff, emergency services, the McKenna Foundation, representative for special needs populations and City government. City staff from the Police Department, the Westside Community Center and the CDBG program participate in the Coalition's planning process.

The Texas Balance of State CoC is made up of all service providers, advocates, local government officials, and citizens who work to eliminate homelessness in over 216 counties in Texas outside of most major metropolitan cities. THN assists local homeless coalitions with community-based planning to develop plans to end homelessness and new projects to fill gaps in housing and services. THN manages the Continuum of Care application process and the statewide Homeless Management Information System.

Addressing the emergency and transitional housing needs of homeless persons

The City of New Braunfels is not a direct recipient of Emergency Solution Grant funds (ESG), but uses its CDBG funds to support agencies who provide emergency shelter and rent/utility assistance programs that prevent homelessness.

Three agencies provide shelters for specific homeless populations in New Braunfels. The Comal County Crisis Center operates an emergency shelter for victims of domestic violence and sexual assault and their children. Connections provides emergency shelter and transitional housing for youth aging out of foster care and unaccompanied homeless youth. Family Promise provides emergency shelter to families experiencing homelessness. All agencies have received CDBG funding in previous years.

The Comal County Crisis Center has expanded its emergency shelter to 80 beds and is in the process of developing transitional housing. This will allow shelter residents to move into transitional housing and not be in emergency shelter for long periods of time or have to return to their abuser because there are no other housing options.

The Transitional Living Program at Connections houses youth ages 15 to 21 and is designed to better prepare them for productive independent living. Residential staff and counselors provide guidance in the

areas of goal setting, financial planning, educational coaching, and employment assistance. Connections operates two shelters for youth ages 5-17 who are in crisis and need a safe place to stay. The program accepts youth referred due to runaway behaviors, family conflict, abuse, neglect, or homelessness; this includes youth who are part of the foster care system who have recently been removed from home as well as those being relocated from a different placement. In addition to meals and short-term housing, the shelters offer individual, group and family counseling; recreational activities; and transportation to educational and medical services.

New Braunfels does not have an emergency shelter for homeless single adults. Through extensive coordination amongst the agencies, members of the Comal County Homeless Coalition opened and supported the city's Cold Weather shelter for homeless residents when temperatures dropped below freezing for several days during winter months. A task force has been created within the Coalition to further develop processes and procedures for the Cold Weather shelter and also to research other shelter opportunities offered by similar-sized cities. The Cold Weather shelter has been opened for two winter seasons and will be open in the upcoming years.

Planning and construction are currently underway for Sunrise Apartment Homes, a 43-unit complex, which will offer affordable temporary housing to individuals and families in New Braunfels. In addition to subsidized rental rates, residents will benefit from case management and supportive services to help them become self-sustainable.

Transitional housing, rapid re-housing and permanent supportive housing are recognized as an unmet need in New Braunfels. Without these types of programs, it is not possible to facilitate entry into permanent housing. The City and New Braunfels agencies are researching ways to provide the various types of housing and programs that will assist those experiencing homelessness exit into more stable housing.

City staff from law enforcement, Westside Community Center and the Grants Coordinator are active participants in the Coalition and participate in the annual Point-In-Time count which provides information on the number and types of homelessness in the City. This information is vital in developing housing and services programs.

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

There are few community resources specifically for chronically homeless, individuals and families, families with children, veterans and their families, and unaccompanied youth to assist with transition to permanent housing and independent living. There are no permanent supportive housing programs

located in the City. The City's role has been to provide CDBG funding to agencies that provide services and housing to the homeless populations including Family Promise (emergency shelter for families); Comal County Crisis Center (domestic violence shelter); San Antonio Food Bank; The Salvation Army; and Connections (emergency shelter for homeless and runaway youth). Local faith-based organizations also provide specific assistance to those in need as they are able. The lack of resources for homeless housing and services is an unmet need in New Braunfels.

The City will continue to participate in the local homeless coalition, sponsor meetings and discussion groups around the issues of homelessness and provide an opportunity for agencies to apply for CDBG funding on an annual basis.

Help low-income individuals and families avoid becoming homeless, especially extremely low-income individuals and families who are likely to become homeless after being discharged from a publicly funded institution or system of care, or who are receiving assistance from public and private agencies that address housing, health, social services, employment, education or youth needs

Families living below the poverty level and those on a fixed income are often unable to afford to maintain their homes, which puts them at risk of becoming homeless. The City will continue to use CDBG funds to support programs that address housing and service issues.

As part of the Continuum of Care planning with the Comal County Homeless Coalition, the City will work with service and housing providers to develop mechanisms that prevent discharge from public institutions into homelessness. As resources are limited, agencies will continue to investigate housing options in nearby larger communities such as Austin and San Antonio. The City of New Braunfels does not receive Continuum of Care, ESG or HOPWA funds but supports agency efforts by providing CDBG funds when possible.

In PY20 the City is assisting low-income and/or homeless persons by providing CDBG funding to agencies that provide supportive services to victims of domestic violence, food assistance, emergency rental and utility assistance, services to abused and neglected children, Meals on Wheels for elderly/disabled individuals, and activities at the Westside Community Center including budgeting and meal planning.

To ensure that individuals are not discharged from public institutions into homelessness, area facilities and institutions have policies to guard against that possibility.

Following are those safeguards:

Foster Care: Case managers within the Texas Department for Family and Protective Services ensure a plan is in place for each youth leaving the system, including naming a destination or facilitate transition to private supervision. The plan takes the well-being of the youth into account and follow-up interviews take place to ensure shelter, family and stability. For foster care youth who age-out of the foster care system,

TDPRS ensures access to educational and vocational opportunities, financial options and available mental health and substance abuse services.

Health Care: Area hospitals have policies ensuring persons being discharged receive case management on placement needs so as to ensure patients will not be discharged into homelessness but, instead, to appropriate housing programs and facilities. Homeless and social service providers regularly collaborate with discharge staff to identify patient needs and ensure that patients are not discharged into homelessness.

Mental Health: By networking with family, community agencies, and with the patient, mental health providers work to ensure patients have a place to reside prior to being discharged. This plan includes where the patient will live, whether with family, in a basic care or adult foster care facility, or other care facility. Other local, state or governmental agencies are also consulted to ensure ongoing stability and support services

Corrections Facilities: The Texas Department of Criminal Justice works with discharge planners to ensure inmates have a smooth transition into communities. Parole officers or case managers provide personalized plans to assist inmates with specific needs and provides information on local agencies and service providers.

SP-65 Lead based paint Hazards – 91.215(i)

Actions to address LBP hazards and increase access to housing without LBP hazards

Lead-based paint hazard identification and reduction strategies include education, outreach, and conformance with 24 CFR Part 35 regulations. The City distributes and maintains documentation of required information for homes built before 1978, including the EPA Lead-based Pamphlet, Notification of Lead Hazard Evaluation, and Notification of Lead Hazard Reduction. The City funds minor home repair, weatherization and Aging in Place programs through subrecipient agencies. Lead-based paint information is included in the application package and agency staff discusses lead-based paint issues with the applicants.

City coordinates with Comal County Health Department to review addresses of proposed housing projects to determine if the location is a housing unit in which children have been previously identified as having elevated blood lead levels.

How are the actions listed above related to the extent of lead poisoning and hazards?

In all HUD funded programs, persons living in or purchasing houses built before 1978 must be made aware of the hazards associated with lead paint and availability and practicality of low cost encasement, encapsulation and other related products. Data provided by the Texas Department of Health Services reports that in 2018, there were 868 children tested in Comal County with 11 children having elevated blood lead levels (EBLL).

How are the actions listed above integrated into housing policies and procedures?

The City requires lead-testing from qualified lead inspectors for proposed housing projects for housing built prior to 1978 in which the household includes children aged five or under. Positive test results will be reported by City to Comal County Health Department so that the Health Department may then initiate the required lead-testing protocol.

As applicable, a lead hazard remediation plan must be included with the scope of work that is submitted to the City by the CDBG-funded subrecipient prior to project approval. A notice to proceed will not be issued by City until a qualified lead inspector verifies that the identified lead hazard has been abated.

SP-70 Anti-Poverty Strategy – 91.215(j)

Jurisdiction Goals, Programs and Policies for reducing the number of Poverty-Level Families

The City of New Braunfels has very little control over the factors that affect the number of poverty level families within its jurisdiction. The City is a rapidly growing community and, as a result, the number of poverty-level families is increasing as the overall population of the City continues to grow. The City's goals, programs, and policies attempt to reduce the number of poverty-level persons and families by providing assistance and services to reduce the impact of poverty on individuals and families, especially those with special needs.

How are the Jurisdiction poverty reducing goals, programs, and policies coordinated with this affordable housing plan

Given the City's limited financial resources, the poverty level in the City is a challenging issue to address. Because the majority of factors affecting a family's poverty-level status are typically beyond the control of City policies, the extent to which proposed strategies will reduce and/or assist in reducing the number of poverty-level families is difficult to gauge. However, the City's overall goals of reducing poverty are reflected in the Consolidated Plan goals and in the programs provided funding through the CDBG program. In addition, the City will encourage existing networks of social service providers to expand their efforts to coordinate referrals and services to address the needs of poverty-level families. The City will continue to hold focus groups and stakeholder meetings throughout the year in an effort to identify successful strategies and programs that can assist poverty level families.

SP-80 Monitoring – 91.230

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

Ongoing Compliance and Monitoring:

Projects proposed by eligible organizations will be reviewed by staff for compliance with eligibility requirements, national objectives, the Consolidated Plan and City Council guidelines prior to being reviewed by the Community Development Advisory Committee (CDAC). CDAC is responsible for making funding recommendations to City Council.

Staff monitors to ensure that Federal labor standards, bidding and contract requirements are met when a project is required to implement Davis-Bacon.

Prior to issuing reimbursement for any goods or services, the City verifies that the goods or services have been provided according to specific program requirements and that all relevant documentation has been submitted to the City.

The Consolidated Annual Performance Evaluation Report (CAPER) provides the City Council and HUD with an annual performance report identifying performance toward planned goals during the Program Year.

Subrecipient Monitoring:

City staff monitors each subrecipient of CDBG funds for compliance with CDBG rules and regulations. Each subrecipient has an executed Subrecipient Contract with the City that sets out HUD rules and regulations, performance objectives, long-term compliance requirements, the scope of the funded program and the CDBG grant amount.

The City has developed standardized monitoring forms that are due on a monthly basis and reviewed by staff to determine if the subrecipient is on track to meet contractual goals. These forms provide beneficiary data; project progress reports. City staff maintains contact with the subrecipients on a regular basis and is available for technical assistance if requested or if the need is identified from monthly reports or during a monitoring visit.

All subrecipients receive at least one on-site monitoring visit during the Program Year. However desktop reviews may be performed if necessary due to natural or manmade disasters. For new or poorly performing subrecipients, monitoring may more frequent. The subrecipients are notified via letter and provided with a list of items that will be reviewed. The letter includes information that City staff will need to review as well as any particular staff person that needs to be available to answer questions. If there are any findings during the monitoring visit, they will be included in a letter to the subrecipient, with

expected outcomes and the time frame to correct all monitoring findings or concerns. The City offers one-on-one technical assistance and group meeting/training sessions for the subrecipients during the year.

The City also monitors its own performance to ensure it is meeting the goals and objectives as set forth in the Consolidated Plan. Program and subrecipient files are reviewed at least once per quarter to ensure that the information was accurate and current. This information is transferred into the IDIS system that allows HUD to track the City's performance as well.

The City continues to seek and encourage participation of small, minority, and/or women owned businesses in the expenditure of its CDBG grant. The City's Purchasing Department provides a list of minority and women owned businesses to subrecipients when bids are required for CDBG projects. Subrecipient agencies have a Section 3 clause in their contracts with the City. Section 3 requirements are discussed in application workshops and at the contract signing. Subrecipients are required to track this information and submit a Section 3 report for employees and contractors or vendors involved in CDBG projects. Currently, there are no Section 3 contractors in the City.

Expected Resources

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

Introduction

The City of New Braunfels bases the anticipated CDBG resources for the 2020 - 2024 Consolidated Plan based on the PY20 grant of \$413,251.

Anticipated Resources

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
CDBG	public - federal	Acquisition Admin and Planning Economic Development Housing Public Improvements Public Services	413,251	0	70,996	484,247	1,653,074	Expected amount for remainder of Con Plan based on PY20 allocation

Table 55 - Expected Resources for PY20

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

Subrecipients of CDBG funding from the City of New Braunfels are expected to leverage the CDBG funds with other private, state or local funds.

This information is built into applications for funding and taken into consideration when funding recommendations are made by the Community Development Advisory Committee to City Council. CDBG does not require matching funds. When CDBG funds are used for city projects such as parks, community centers and infrastructure improvements, these projects are generally funded from other resources also such as the general fund or other grant funds.

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

The City of New Braunfels has used and will continue to use CDBG funding for park and public facilities in low-mod areas to improve the quality of life for residents.

Discussion

City general funds and other state and federal funds are used to support city projects in which CDBG funds are proposed and are also the sole funding source for some projects located in low-moderate income areas of the City.

Annual Goals and Objectives

AP-20 Annual Goals and Objectives

Goals Summary Information

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
1	HOUSING NEEDS (HN) 1.1	2020	2024	Affordable Housing	City Wide	HOUSING NEEDS	CDBG: \$11,550	Direct Financial Assistance to Homebuyers: 5 Households Assisted
2	HOUSING NEEDS (HN) 1.2	2020	2024	Affordable Housing	City Wide	HOUSING NEEDS	CDBG: \$80,000	Homeowner Housing Rehabilitated: 6 Household Housing Unit
3	HOUSING NEEDS (HN) 1.3	2020	2024	Affordable Housing	City Wide	HOUSING NEEDS	CDBG: \$108,387	Homeowner Housing Rehabilitated: 16 Household Housing Unit
4	HOUSING NEEDS (HN) 1.5	2020	2024	Affordable Housing	City Wide	HOUSING NEEDS	CDBG: \$75,038	Rental units rehabilitated: 10 Household Housing Unit
5	HOUSING NEEDS (HN) 1.7	2020	2024	Homeless	City Wide	HOUSING NEEDS	CDBG: \$36,000	Overnight/Emergency Shelter/Transitional Housing Beds added: 48 Beds
6	PUBLIC SERVICES (SLE) 2.6	2020	2024	Non-Housing Community Development	City Wide	PUBLIC SERVICES	CDBG: \$12,000	Public service activities other than Low/Moderate Income Housing Benefit: 35 Persons Assisted
7	PUBLIC SERVICES (SLE) 2.7	2020	2024	Non-Housing Community Development	City Wide	PUBLIC SERVICES	CDBG: \$10,000	Public service activities other than Low/Moderate Income Housing Benefit: 100 Persons Assisted

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
8	PUBLIC SERVICES (SLE) 2.8	2020	2024	Non-Housing Community Development	City Wide	PUBLIC SERVICES	CDBG: \$9,787	Public service activities other than Low/Moderate Income Housing Benefit: 20 Persons Assisted
9	PUBLIC SERVICES (SLE) 2.9	2020	2024	Non-Housing Community Development	City Wide	PUBLIC SERVICES	CDBG: \$5,200	Public service activities other than Low/Moderate Income Housing Benefit: 5 Persons Assisted
10	PUBLIC SERVICES (SLE) 2.10	2020	2024	Non-Housing Community Development	City Wide	PUBLIC SERVICES	CDBG: \$10,000	Public service activities other than Low/Moderate Income Housing Benefit: 120 Persons Assisted
11	PUBLIC SERVICES (SLE) 2.11	2020	2024	Non-Housing Community Development	City Wide	PUBLIC SERVICES	CDBG: \$15,000	Public service activities other than Low/Moderate Income Housing Benefit: 225 Persons Assisted
12	ADMINISTRATION (AD) 5.1	2020	2024	Non-Housing Community Development	City Wide	ADMINISTRATION	CDBG: \$82,650	Other: 200 Other

Table 506 – Goals Summary

Goal Descriptions

1	Goal Name	HOUSING NEEDS (HN) 1.1
	Goal Description	Provide down payment and closing costs assistance to 5 first-time low-moderate income homebuyers.

2	Goal Name	HOUSING NEEDS (HN) 1.2
	Goal Description	Minor home repairs for low-moderate income elderly and/or disabled homeowners.
3	Goal Name	HOUSING NEEDS (HN) 1.3
	Goal Description	Also addresses Housing Needs (HN) 1.4 - Aging in Place improvements for low-moderate elderly homeowners and weatherization for low-moderate income homeowners.
4	Goal Name	HOUSING NEEDS (HN) 1.5
	Goal Description	Rehabilitation of exterior and interior repairs to subsidized rental properties.
5	Goal Name	HOUSING NEEDS (HN) 1.7
	Goal Description	Funding for Phase 1 of a transitional housing facility for victims of domestic violence.
6	Goal Name	PUBLIC SERVICES (SLE) 2.6
	Goal Description	Home delivered meals to elderly and/or disabled low-moderate income persons.
7	Goal Name	PUBLIC SERVICES (SLE) 2.7
	Goal Description	Emergency rent and utility assistance to low-moderate persons/households.
8	Goal Name	PUBLIC SERVICES (SLE) 2.8
	Goal Description	Mental health services including individual and group counseling for low-moderate income persons.
9	Goal Name	PUBLIC SERVICES (SLE) 2.9
	Goal Description	Case management and supportive services to people diagnosed with HIV and AIDS.

10	Goal Name	PUBLIC SERVICES (SLE) 2.10
	Goal Description	Advocacy and services to abused and/or neglected children.
11	Goal Name	PUBLIC SERVICES (SLE) 2.11
	Goal Description	Emergency food assistance to low-moderate income persons/households.
12	Goal Name	ADMINISTRATION (AD) 5.1
	Goal Description	Management and oversight of CDBG program.

Table – 57 – Goals Descriptions

Projects

AP-35 Projects – 91.220(d)

Introduction

The City of New Braunfels will provide funding in PY20 for activities that meet the needs and objectives established by its Consolidated Plan and approved by City Council. As shown below, the City will fund public services through five agencies, a minor home repair program for elderly and/or low income homeowners, weatherization and Aging in Place programs for low-moderate income homeowners and down payment and closing costs assistance for low-moderate first time homebuyers.

There is a balance of \$28,637.40 of funding that has not been allocated at this time. Unallocated funds will be utilized for an eligible project that will be identified during PY20.

Projects

#	Project Name
1	Comal County Habitat for Humanity - Home Ownership Assistance
2	Comal County Senior Citizens Foundation - Minor Home Repair Program
3	Comal County Habitat for Humanity - Housing Rehabilitation Program
4	Prospera, LLC - Village Circle Apartments
5	Comal County Crisis Center
6	Comal County Senior Citizens Foundation - Meals on Wheels
7	Family Life Center
8	River City Advocacy & Counseling Program
9	Holistic Empowerment Resources
10	CASA of Central Texas
11	San Antonio Food Bank
12	Administration

Table 58 – Project Information

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

The City of New Braunfels responds to the goals and priorities set forth in the 2020 – 2024 Consolidated Plan and the needs expressed in public hearings, stakeholder meetings and comments from residents. Affordable housing (rental and homeownership), affordable child care and public transportation are critical needs. To improve the quality of life of all citizens in New Braunfels, the City will work with service and housing providers to address both the need for additional affordable housing and supportive service needs. The City will use CDBG funds to provide down payment and closing cost assistance to low-moderate income homebuyers and continue to support the minor home repair program

for elderly and/or disabled homeowners, weatherization and Aging in Place programs as well as supportive services programs.

The lack of additional funding is the major obstacle faced by the City when meeting underserved needs especially the lack of affordable housing both rental and for purchase. Another obstacle is the lack of capacity of the local providers to undertake construction and management of affordable housing properties. The City will continue to investigate funding opportunities as they are identified and to seek housing agencies that are interested in expanding their housing programs into other cities and counties.

AP-38 Project Summary

Project Summary Information - *See Next Page*

1	Project Name	Comal County Habitat for Humanity - Home Ownership Assistance
	Target Area	City Wide
	Goals Supported	HOUSING NEEDS (HN) 1.1
	Needs Addressed	HOUSING NEEDS
	Funding	CDBG: \$11,550
	Description	Non-profit agency provides home ownership opportunities and owner-occupied housing rehabilitation.
	Target Date	9/30/2021
	Estimate the number and type of families that will benefit from the proposed activities	It is estimated that five first-time homebuyers will receive assistance during the program year.
	Location Description	Office: 1269 Industrial Street, New Braunfels, TX 78130
	Planned Activities	Down payment and closing costs assistance to low-moderate income first-time homebuyers.
2	Project Name	Comal County Senior Citizens Foundation - Minor Home Repair Program
	Target Area	City Wide
	Goals Supported	HOUSING NEEDS (HN) 1.2
	Needs Addressed	HOUSING NEEDS
	Funding	CDBG: \$80,000
	Description	Non-profit agency providing a variety of educational, recreational and social activities to senior citizens including a hot lunch served at the facility. CDBG funded program provides minor home repairs and accessibility improvements to income eligible homeowners.
	Target Date	9/30/2021
	Estimate the number and type of families that will benefit from the proposed activities	It is estimated that five homeowners will receive assistance during the program year.
	Location Description	Office: 655 Landa Street, New Braunfels, TX 78130 Projects have not yet been selected.

	Planned Activities	Minor home repairs including accessibility improvements designed to enable elderly and/or disabled New Braunfels homeowners to remain in their homes. All recipients are low-moderate income.
3	Project Name	Comal County Habitat for Humanity - Housing Rehabilitation Program
	Target Area	City Wide
	Goals Supported	HOUSING NEEDS (HN) 1.3
	Needs Addressed	HOUSING NEEDS
	Funding	CDBG: \$108,387
	Description	Non-profit agency provides home ownership opportunities and owner-occupied housing rehabilitation.
	Target Date	9/30/2021
	Estimate the number and type of families that will benefit from the proposed activities	It is estimated that a total of eight projects will be completed during the program year.
	Location Description	Office: 1269 Industrial Street, New Braunfels, TX 78130 Project sites have not been selected.
	Planned Activities	Aging in Place improvements and repairs for low-moderate income elderly homeowners. Weatherization improvements for low-moderate income homeowners.
4	Project Name	Prospera, LLC - Village Circle Apartments
	Target Area	City Wide
	Goals Supported	HOUSING NEEDS (HN) 1.5
	Needs Addressed	HOUSING NEEDS
	Funding	CDBG: \$75,038
	Description	Exterior repairs to one building with 10 units.
	Target Date	9/30/2021
	Estimate the number and type of families that will benefit from the proposed activities	It is estimated that 10 low-moderate income households will benefit from exterior improvement to their units during the program year.
	Location Description	101 Glenbrook Drive East, New Braunfels, TX 78130

	Planned Activities	Exterior repairs to one building in the complex with 10 units.
5	Project Name	Comal County Crisis Center
	Target Area	City Wide
	Goals Supported	HOUSING NEEDS (HN) 1.7
	Needs Addressed	HOUSING NEEDS
	Funding	CDBG: \$36,000
	Description	Non-profit agency that provides emergency shelter, supportive services, a crisis hotline, counseling services to victims of domestic violence and sexual assault.
	Target Date	9/30/2021
	Estimate the number and type of families that will benefit from the proposed activities	It is estimated that 24 hotel-like suites will be constructed.
	Location Description	Office: 1547 East Common Street, New Braunfels, TX 78130
	Planned Activities	Phase 1 of development of a housing facility that will allow clients to move from the emergency shelter into transitional housing.
6	Project Name	Comal County Senior Citizens Foundation - Meals on Wheels
	Target Area	City Wide
	Goals Supported	PUBLIC SERVICES (SLE) 2.6
	Needs Addressed	PUBLIC SERVICES
	Funding	CDBG: \$12,000
	Description	Non-profit agency providing social and recreational activities including a Meals on Wheels program (home delivery) to low-moderate income persons who are elderly and/or disabled.
	Target Date	9/30/2021
	Estimate the number and type of families that will benefit from the proposed activities	It is estimated that 35 people will receive home delivered meals.
	Location Description	Office: 655 Landa Street, New Braunfels, TX 78130
	Planned Activities	Home delivered meals to income eligible elderly and/or disabled New Braunfels residents five days per week with food provided on Friday for the week-end.

7	Project Name	Family Life Center
	Target Area	City Wide
	Goals Supported	PUBLIC SERVICES (SLE) 2.7
	Needs Addressed	PUBLIC SERVICES
	Funding	CDBG: \$10,000
	Description	Non-profit agency that provides emergency rent and utility assistance to low-moderate income households as well as other supportive services.
	Target Date	9/30/2021
	Estimate the number and type of families that will benefit from the proposed activities	It is estimated that 100 persons/households will receive assistance during the program year.
	Location Description	Office: 5513 North Interstate 35, New Braunfels, TX 78132
	Planned Activities	Emergency rent and utility assistance in an effort to prevent eviction and homelessness as well as budgeting and self-sufficiency activities.
8	Project Name	River City Advocacy & Counseling Program
	Target Area	City Wide
	Goals Supported	PUBLIC SERVICES (SLE) 2.8
	Needs Addressed	PUBLIC SERVICES
	Funding	CDBG: \$9,787
	Description	Non-Profit agency that provides counseling and peer support to low-moderate income persons on a sliding fee scale.
	Target Date	9/30/2021
	Estimate the number and type of families that will benefit from the proposed activities	It is estimated the 20 persons will receive mental health services during the program year.
	Location Description	145 Landa Street, New Braunfels, TX 78130
	Planned Activities	The Community Counseling Program will provide access to affordable mental health counseling to low-moderate income individuals through one-on-one counseling, group therapy and peer support.
9	Project Name	Holistic Empowerment Resources
	Target Area	City Wide

	Goals Supported	PUBLIC SERVICES (SLE) 2.9
	Needs Addressed	PUBLIC SERVICES
	Funding	CDBG: \$5,200
	Description	Non-profit agency providing a holistic approach to case management and supportive services for persons diagnosed with HIV or AIDS.
	Target Date	9/30/2021
	Estimate the number and type of families that will benefit from the proposed activities	It is estimated that five New Braunfels residents with HIV or AIDS will receive services during the program year.
	Location Description	238 Terminal Loop, McQueeny, TX 78123
	Planned Activities	Case management and supportive services to New Braunfels residents diagnosed with HIV or AIDS using a holistic approach.
10	Project Name	CASA of Central Texas
	Target Area	City Wide
	Goals Supported	PUBLIC SERVICES (SLE) 2.10
	Needs Addressed	PUBLIC SERVICES
	Funding	CDBG: \$10,000
	Description	Non-profit agency providing advocacy for abused and/or neglected children that are in the child welfare and court system.
	Target Date	9/30/2021
	Estimate the number and type of families that will benefit from the proposed activities	It is estimated that 120 children will receive services during the program year.
	Location Description	1619 Common Street, Suite 301, New Braunfels, TX 78130
	Planned Activities	Advocacy services and case management for children through recruiting, training and supervising volunteers who have been appointed by the court to be Court Appointed Special Advocates.
11	Project Name	San Antonio Food Bank
	Target Area	City Wide
	Goals Supported	PUBLIC SERVICES (SLE) 2.11
	Needs Addressed	PUBLIC SERVICES

	Funding	CDBG: \$15,000
	Description	Non-profit agency that provides food and non-food assistance to low-moderate income individuals and families who are experiencing food insecurity.
	Target Date	9/30/2021
	Estimate the number and type of families that will benefit from the proposed activities	It is estimated that 225 persons will receive food assistance during the program year.
	Location Description	1629 South Seguin, New Braunfels, TX 78130
	Planned Activities	Distribution of food and non-food items to New Braunfels residents through the Kitchen Table, cooking and nutrition classes and other educational programs.
12	Project Name	Administration
	Target Area	City Wide
	Goals Supported	ADMINISTRATION (AD) 5.1
	Needs Addressed	ADMINISTRATION
	Funding	CDBG: \$82,650
	Description	Administration and oversight of the CDBG program including Fair Housing activities.
	Target Date	9/30/2021
	Estimate the number and type of families that will benefit from the proposed activities	Low-moderate income residents of New Braunfels will benefit from the administration of the CDBG program through funding awarded to subrecipients.
	Location Description	550 Landa Street, New Braunfels, TX 78130
	Planned Activities	Management of the CDBG program including development and submission of required documents and reports; managing the CDBG subrecipient application process and review; monitoring CDBG subrecipients; facilitating the Community Development Advisory Committee; conducting fair housing activities.

Table 59 – Project Summary

AP-50 Geographic Distribution – 91.220(f)

Description of the geographic areas of the entitlement (including areas of low-income and minority concentration) where assistance will be directed

The City of New Braunfels is not allocating fund geographically to specific targeted areas. Funding is allocated for projects in qualified low-moderate income areas or to programs that provide services to low-moderate income people or households.

Geographic Distribution

Target Area	Percentage of Funds
City Wide	100

Table 60 - Geographic Distribution

Rationale for the priorities for allocating investments geographically

The City of New Braunfels is not allocating fund geographically to specific targeted areas.

Discussion

City of New Braunfels continues to improve low-income residential neighborhoods, especially those with high concentrations of minorities, by improving parks and other public facilities. These public improvements make the neighborhoods safer and more desirable to all residents.

The City is researching and will continue to discuss whether developing a Neighborhood Revitalization Strategy Area would be a more effective way to use CDBG funds. The City is also exploring economic development activities that could provide jobs for low-moderate income residents or be located in low-moderate income neighborhoods.

Affordable Housing

AP-55 Affordable Housing – 91.220(g)

Introduction

Efforts have been made to retain affordable housing stock by continually funding the Comal County Senior Foundation minor rehabilitation program which addresses issues of deferred maintenance for low-income elderly and/or disabled homeowners and Habitat for Humanity which offers homeownership opportunities to low-moderate income homebuyers. Habitat for Humanity has developed a Housing Rehab Program and will be receiving CDBG funds during PY 2020. Increasing the supply of supportive housing for persons with special needs continues to be a challenge, as well as the supply of affordable housing for low-income persons with access to job opportunities.

During 2018 a Workforce Housing Study was conducted by the New Braunfels Economic Development Corporation. Members include the City of New Braunfels, Comal County, New Braunfels Utilities, the Greater New Braunfels Chamber of Commerce and the New Braunfels Economic Development Foundation. The report describes the demographic and economic conditions that affect and reflect the market environment for housing, document the current conditions and recent trends of the market, and identify potential recommendations for implementation to mitigate housing cost burdens experienced by New Braunfels workers. The report will be used as a blueprint as the City continues to develop affordable housing. For example, the report identified that 70% of New Braunfels workers live outside of city limits because of “housing affordability and value.” The report will be used as a blueprint as the City continues to develop affordable housing.

One Year Goals for the Number of Households to be Supported	
Homeless	0
Non-Homeless	123
Special-Needs	14
Total	137

Table 61 - One Year Goals for Affordable Housing by Support Requirement

One Year Goals for the Number of Households Supported Through	
Rental Assistance	100
The Production of New Units	5
Rehab of Existing Units	32
Acquisition of Existing Units	0
Total	137

Table 62 - One Year Goals for Affordable Housing by Support Type

Discussion

Six programs, funded in the 2020 program year, will improve availability and access to affordable housing for individuals and families through direct housing related repairs and rehabilitation and/or the creation of new housing units. Client income, race, ethnicity and household head information will be maintained.

- Habitat for Humanity – five single family homebuyer housing units. Homebuyers will be income qualified within the 50%-80% income category.
- Family Life Center – emergency rental assistance to 100 residents
- Comal County Senior Citizens Foundation – minor home repairs for six elderly/disabled homeowners
- Comal County Habitat for Humanity – Weatherization program for eight low-moderate income homeowners
- Comal County Habitat for Humanity – Aging In Place improvements for eight low-moderate elderly homeowners
- Prospera – Village Circle Apartments – exterior repairs to 10 units

AP-60 Public Housing – 91.220(h)

Introduction

The public housing organization for the City is the New Braunfels Housing Authority. The Housing Authority has 170 public housing units in New Braunfels that are owned by the Housing Authority. The Housing Authority also owns one high-rise elderly/disabled complex with 100 units and 35 duplexes for larger families. The Housing Authority provides 242 vouchers through the Housing Choice Voucher program. The extent of generational poverty in local public housing is not clear. The City will work with the housing authority to determine if generational poverty is indeed a problem and identify strategies to reduced generational poverty.

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

The City of New Braunfels and the Housing Authority plan to continue working together to identify ways to provide affordable rental units and increase homeownership for public housing residents. The City does not proposed any direct activities with the New Braunfels Housing Authority using CDBG funds for PY20 but will continue to collaborate with the Housing Authority in an effort to identify and develop CDBG eligible projects.

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

New Braunfels Housing Authority encourages the residents to be more involved in Resident Council meetings by providing the residents the opportunity to learn about the activities, security, modernization projects and management issues and provide input and feedback. City staff will continue to meet with the Executive Director to discuss upcoming changes and plans for public housing residents and properties. The City plans to have regular meetings and work more closely with the housing authority as the City further develops their Workforce Housing efforts.

The City will continue to support efforts to coordinate the work of social service organizations that provide services, housing assistance and homeownership opportunities to public housing residents. Comal County Habitat for Humanity holds regular information sessions and application assistance for public housing residents for the agency's homeownership program. The City has supported Habitat's efforts by providing CDBG closing costs assistance for the past five years. Habitat will receive \$11,550 from CDBG for down payment and closing costs assistance during PY20.

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

provided or other assistance

The New Braunfels Housing Authority is not designated as a troubled housing authority.

Discussion

The City supports the efforts of the Housing Authority and will work to identify ways to partner together to provide safe, affordable housing and homeownership opportunities.

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

Introduction

The Comal County Homeless Coalition is part of the Texas Balance of State Continuum of Care and is managed by the Texas Homeless Network (THN), a statewide nonprofit agency. The Texas Balance of State CoC is made up of all service providers, advocates, local government officials, and citizens who work to eliminate homelessness in over 216 counties in Texas outside of most major metropolitan cities. THN assists local homeless coalitions with community-based planning to develop plans to end homelessness and new projects to fill gaps in housing and services. THN manages the Continuum of Care application process and the statewide Homeless Management Information System.

The Comal County Homeless Coalition meets monthly to discuss issues and challenges in meeting the needs of those experiencing homelessness or at-risk of homelessness. Members of the Coalition represent service and housing providers, public housing staff, emergency services such as The Salvation Army, the McKenna Foundation, special needs populations and City government. City staff from the Police Department, the Westside Community Center and the CDBG program participate in the Coalition's planning process.

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

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

The City and local service providers have primarily focused on homeless prevention during the past few year with the provision of direct assistance with emergency rent and utilities as well as supportive services to help those potentially at risk of becoming homeless. In 2018 the first winter emergency shelter was opened and again was available to people experiencing homelessness in 2019.

Goals for the upcoming year include:

In New Braunfels, some agencies provide outreach services for the specific population that they serve, i.e., victims of domestic violence and youth but there are no agencies focusing specifically on outreach. Information regarding services and housing is distributed by local agencies, local churches that operate food pantries, at nonprofit agencies and governmental entities. The City will continues to work with agencies that could provide outreach services especially to persons that are unsheltered in the area. The Coalition assesses individual needs through the Point in Time and Housing Inventory enumerations that are done every January.

- The continuation of the providing a winter shelter.
- Two agencies have begun work on the development of transitional housing properties which will

provide 67 new units of transitional housing.

- The Coalition continues to discuss plans to develop a homeless shelter and hopes to identify a location, funding source for construction or rehabilitation and operations.
- Agencies are being encouraged to apply for Continuum of Care and Emergency Solutions grants

Addressing the emergency shelter and transitional housing needs of homeless persons

With a focus on homeless prevention, the City and local service providers have identified the provision of direct assistance with rent and utilities as well as supportive services to help those potentially at risk of becoming homeless as the key priorities.

There is not a year round homeless shelter in New Braunfels. A winter shelter was opened for the City's unsheltered population in 2018 and 2019. The winter shelter again will be open during the winter of 2020. The Comal County Crisis Center operates an emergency shelter for victims of domestic violence and sexual assault. Connections has an emergency shelter and transitional housing program for youth between the ages of 13 – 18. The programs are available for unaccompanied homeless youth and those aging out of foster care. There are two transitional housing development that are underway and have broken ground. One will provide housing for women and children exiting from the domestic violence shelter. The other property will provide transitional housing to the general population.

The City and Coalition are aware of the lack of housing choice within the City and are committed to working with agencies that are interested in constructing affordable housing or developing a Rapid Re-Housing program. Working with the Coalition, the City will continue to identify agencies in and out of New Braunfels who would be interested in expanding services and housing into the City.

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

The City and Coalition are aware of the lack of emergency shelter and housing choice within the City and are committed to working with agencies that are interested in constructing affordable housing or developing a Rapid Re-Housing program. Working with the Coalition, the City will continue to identify agencies in and out of New Braunfels who would be interested in expanding services and housing into the City. At this time there are no programs that provide assistance in transiting people experiencing homelessness into stable housing. The City continues to focus limited resources on homeless prevention activities.

Helping low-income individuals and families avoid becoming homeless, especially extremely

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

As part of the Continuum of Care planning with the Comal County Homeless Coalition, the City will work with service and housing providers to develop mechanisms that prevent discharge from public institutions into homelessness. As resources are limited, agencies will continue to investigate housing options in nearby larger communities such as Austin and San Antonio. The City of New Braunfels does not receive Continuum of Care, ESG or HOPWA funds but supports agency efforts by providing CDBG funds when possible.

To ensure that individuals are not discharged from public institutions into homelessness, area facilities and institutions have policies to guard against that possibility.

Following are those safeguards:

Foster Care: Case managers within the Texas Department for Family and Protective Services ensure a plan is in place for each youth leaving the system, including naming a destination or facilitate transition to private supervision. The plan takes the well-being of the youth into account and follow-up interviews take place to ensure shelter, family and stability. For foster care youth who age-out of the foster care system, TDPRS ensures access to educational and vocational opportunities, financial options and available mental health and substance abuse services.

Health Care: Area hospitals have policies ensuring persons being discharged receive case management on placement needs so as to ensure patients will not be discharged into homelessness but, instead, to appropriate housing programs and facilities. Homeless and social service providers regularly collaborate with discharge staff to identify patient needs and ensure that patients are not discharged into homelessness.

Mental Health: By networking with family, community agencies, and with the patient, mental health providers work to ensure patients have a place to reside prior to being discharged. This plan includes where the patient will live, whether with family, in a basic care or adult foster care facility, or other care facility. Other local, state or governmental agencies are also consulted to ensure ongoing stability and support services

Corrections Facilities: The Texas Department of Criminal Justice works with discharge planners to ensure inmates have a smooth transition into communities. Parole officers or case managers provide personalized plans to assist inmates with specific needs and provides information on local agencies and

service providers.

Discussion

Given the limited CDBG funding and the fact that the City is not an ESG recipient, the City's ability to directly respond and assist those experiencing homelessness is limited. The City must rely on the non-profits in the area to provide housing and services. The City is a recipient of CARES Act funding and is using those funds for emergency shelter, emergency services and homeless prevention activities.

The CARES Act provided \$243,102 in Community Development Block Grant Coronavirus (CDBG-CV) funds to the City. CDBG-CV funds were allocated through a competitive process to agencies for activities that support the unique needs of low- and moderate-income persons who have been affected by COVID-19. Additionally, unallocated funds from PY19 in the amount of \$68,923 were used to support CDBG-CV projects for a total of \$312,025 available CDBG-CV projects. Projects funded were:

- CASA of Central Texas – \$55,600 – Services for Abused/Neglected Children affected by COVID-19
- Comal County Crisis Center - \$10,000 – Shelter and food assistance for victims of domestic violence affected by COVID-19.
- Comal County Habitat for Humanity - \$136,425 – Emergency housing assistance for households experiencing a loss of income and an inability to pay rent and/or utilities due to COVID-19.
- Family Life Center - \$10,000 - Comal County Habitat for Humanity - \$136,425 – Emergency housing assistance for households experiencing a loss of income and an inability to pay rent and/or utilities due to COVID-19.
- San Antonio Food Bank - \$100,000 - Emergency food assistance for households experiencing a loss of income due to COVID-19.

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

Introduction:

Affordable housing remains a high priority. Rising costs of construction, the availability of financing and the demand for a limited amount of land have combined to constrain affordable housing production. The result is significantly higher costs for housing when incomes are not be rising at the same pace. The City has appointed residents and business leaders to the Workforce Housing Advisory Committee to study the issues of affordable housing and make recommendations that will improve the availability of affordable housing to the City Council.

Actions it planned to remove or ameliorate the negative effects of public policies that serve as barriers to affordable housing such as land use controls, tax policies affecting land, zoning ordinances, building codes, fees and charges, growth limitations, and policies affecting the return on residential investment

Impediment 1: Lack of Fair Housing Awareness

- Include a fair housing information component to all CDBG public hearings and meetings and conduct 2 activities during Fair Housing month
- Maintain on its website a posting about the Fair Housing Ordinance and how residents can file a complaint
- City will continue to enforce the Fair Housing Ordinance and have a designated Fair Housing Officer

Impediment 2: Lack of Transportation Options

- During the next 5 years, City will investigate the viability of developing and managing a public transit system
- During the next 5 years, City will investigate developing partnerships with other transit providers to increase access to public transportation

Impediment 3: Lack of Affordable Housing

- The Workforce Housing Advisory Committee will continue to identify ways to increase the affordable housing stock
- City will continue to provide minor home repair to owner-occupied housing for low- mod income owners, particularly the elderly and disabled. At least 40 houses will receive minor home repairs during the next 5 years
- City will continue discussions with the PHA to identify other affordable housing options
- The City will support viable Low Income Housing Tax Credits projects
- City will approve viable applications for funding by non-profits to provide down payment and

closing cost assistance to 1st time low-mod income homebuyers

- During the next 5 years, City will assess its current development and zoning ordinances to determine remedies to the shortage of affordable housing new construction

Impediment 4: Lack of Affordable and Accessible Housing Units

- City will fund viable home repair programs to provide assistance with accessibility modifications for low to moderate income homeowners. In PY20 funding will be provided for five home repair projects, eight Aging in Place projects and eight weatherization projects
- City will investigate all complaints filed by or on behalf of a disabled person who has been not allowed to make reasonable accessibility modifications, or to have a service animal or caregiver in their unit

Impediment 5: Lack of Financial Independence and Job Opportunities

- In the next 5 years, City will investigate the Section 108 program as a means to develop new employment opportunities for low-mod income residents
- The City will develop an economic development program to assist small businesses to retain low-moderate income employees using CARES funding
- City will continue to use CDBG funds to support local social service agencies that provide job training, employment services and other social services for low-mod income residents

Impediment 6: Lack of Amenities in Low-Moderate Income Neighborhoods

- In the next 5 years, City will invest CDBG funds for improvements to facilities in the areas of low-income and minority concentrations.

Discussion:

The AI did not identify any barriers to resulting from the public policies. However City will assess its current development and zoning ordinances to determine barriers to affordable housing development and increase incentives for affordable housing development. The City is committed to educating businesses, landlords and residents about fair housing through workshops and community meetings as well as maintaining a Fair Housing Officer to assist with complaints.

AP-85 Other Actions – 91.220(k)

Introduction:

The City partners with public and private organizations to enhance the effectiveness of programs delivering housing and supportive service assistance. A comprehensive network of planning entities and providers ensure that needed and attainable goals are established and resources are leveraged in meeting goals.

Actions planned to address obstacles to meeting underserved needs

Requests for funding far exceed the available entitlement dollars received by the City of New Braunfels. The City will continue to partner with non-profit agencies to leverage its CDBG allocation so that the maximum benefit is achieved. The City will facilitate an annual Stakeholders Meeting and participate in the Comal County Homeless Coalition to identify unmet needs and to strategize on how to meet those needs.

Actions planned to foster and maintain affordable housing

The City will continue to support development of affordable housing by providing flexibility in its development standards that encourages the industry to seek community partners. The City will fund a minor home repair program with repairs and improvements geared toward maintaining the house in a decent condition. The City will support Low Income Housing Tax Credit applications when the project is compatible with the Comprehensive Plan.

The City is currently reviewing recommendations provided by a recent Workforce Housing Report such as supporting the construction of income-restricted multi-family rental units, seeking out non-profit housing developer partners, and public agency incentives for new housing in target price ranges such as reduced impact fees, infrastructure support, and streamlined project reviews.

Actions planned to reduce lead-based paint hazards

Lead-based paint hazard identification and reduction strategies include education, outreach, and conformance with 24 CFR Part 35 regulations. The City distributes and maintains documentation of required information for homes built before 1978, including the EPA Lead-based Pamphlet, Notification of Lead Hazard Evaluation, and Notification of Lead Hazard Reduction. The City funds a minor home repair program and a housing rehab program through subrecipient agencies. Lead-based paint information is included in the application package and agency staff discusses lead-based paint issues with the applicants.

City coordinates with Comal County Health Department to review addresses of proposed housing projects to determine if the location is a housing unit in which children have been previously identified as lead-poisoned. Additionally, the City will require lead-testing from qualified lead inspectors for proposed housing projects for housing built prior to 1978 in which the household includes children aged five or

under. Positive test results will be reported by City to Comal County Health Department so that the County may then initiate their lead-testing protocol.

As applicable, a lead hazard remediation plan must be included with the scope of work that is submitted to the City by the CDBG-funded subrecipient prior to project approval. A notice to proceed will not be issued by City until a qualified lead inspector verifies that the identified lead hazard has been abated.

Actions planned to reduce the number of poverty-level families

New Braunfels addresses the problem of poverty through its strategic goals. Through a holistic approach that combines safe, decent affordable housing for low to moderate income families with social services, education, access to health and employment, the City strives to reduce the poverty rate. The City, as lead agency in the implementation of the Consolidated Plan, will coordinate with local organizations to ensure that goals are met and will continue to provide assistance to agencies that provide services to poverty-level households.

Actions planned to develop institutional structure

The City will continue to make entitlement funds available to the community through issuance of subrecipient agreements. The City provides subrecipient training during the application phase, prior to the execution of Subrecipient Agreements and is available for technical assistance if needed. The City distributes updated information on CDBG funded programs to subrecipients when appropriate. The City will maintain its webpage with up-to-date information as a resource for other city departments, general public and service/housing providers. The City is committed to meeting regularly with interested citizens and stakeholders to discuss community development issues.

The City recognizes the need to provide increased outreach to minority and non-English speaking residents. In an effort to reach these populations, the City will hold public hearings and community meetings at the Westside Community Center and churches or facilities located in low-moderate income areas.

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

In PY20, the City will fund programs for CASA, Family Life Center, San Antonio Food Bank-New Braunfels location, River City Advocacy, Meals on Wheels, Senior Center Minor Home Repair program; Habitat Homeownership Program and Habitat Home Rehab Program.

As the City developed its new Consolidated Plan in the Spring of 2020, the City requested input from various City departments, service providers, the New Braunfels Housing Authority, the City's Workforce Housing Action Committee, the Comal County Homeless Coalition, focus groups, and neighborhood associations to ensure that there is awareness of the available resources and provide a conduit for

communication and collaboration.

Discussion:

Since CDBG funding basically remains level, relationships are key to the success of housing, economic and community development efforts within the City of New Braunfels. The City will continue to partner with service and housing providers to leverage CDBG funding in assisting the low to moderate residents of New Braunfels.

Program Specific Requirements

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

Introduction:

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

Community Development Block Grant Program (CDBG)

Reference 24 CFR 91.220(I)(1)

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

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

Other CDBG Requirements

1. The amount of urgent need activities	0
2. The estimated percentage of CDBG funds that will be used for activities that benefit persons of low and moderate income. Overall Benefit - A consecutive period of one, two or three years may be used to determine that a minimum overall benefit of 70% of CDBG funds is used to benefit persons of low and moderate income. Specify the years covered that include this Annual Action Plan.	0.00%

The City of New Braunfels has not conducted any activities that generate program income. The City does not have a Section 108 loan.