



**ANNUAL ACTION PLAN  
COMMUNITY DEVELOPMENT BLOCK GRANT  
PROGRAM YEAR 2023  
(OCTOBER 1, 2023 – SEPTEMBER 30, 2024)**

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*Neal Linnartz - Mayor  
Andres Campos – District 1  
Christopher Willis – District 2  
Harry Bowers – District 3 & Mayor Pro Tem  
Lawrence Spradley – District 4  
Mary Ann Labowski – District 5  
April Ryan – District 6*

*Robert Camareno – City Manager*

# **Executive Summary**

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

### **1. Introduction**

The City of New Braunfels is an Entitlement City receiving a Community Development Block Grant (CDBG) from the U.S. Department of Housing and Urban Development (HUD). The CDBG Program Year 2023 (PY23) begins on October 1, 2023, and ends on September 30, 2024. To receive its annual entitlement funds, the City must produce an Annual Action Plan each year. The Annual Action Plan describes the City's planned activities for the coming program year, including proposed CDBG projects.

With CDBG federal funds, the City plans to carry out the objectives based on the goals for the 2020-2024 Consolidated Plan (Con Plan) and set forth in this PY23 Annual Action Plan. Pursuant to the City's 5-year Consolidated Plan, the City has focused efforts on improving the quality of life for extremely low-, very low-, and low-income households – those households with incomes at or below 80% of the area median income. The City works in partnership with non-profit agencies as well as internally, to implement activities and projects to improve the quality of life in New Braunfels, through public services, infrastructure, and housing activities.

### **2. Summarize the objectives and outcomes identified in the Plan**

This could be a restatement of items or a table listed elsewhere in the plan or a reference to another location. It may also contain any essential items from the housing and homeless needs assessment, the housing market analysis or the strategic plan.

Based on the priorities of the City of New Braunfels' 2020-2024 Consolidated Plan, information gathered through consultations, and the public participation process provides the basis for the programs and projects to be administered in the PY23 Annual Action Plan. Detailed project information can be found at AP-35.

#### **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. Outcome: Twelve low-moderate income homeowners will be assisted with weatherization and accessibility improvements

**Homelessness:** The homeless needs include emergency shelter, supportive services, transitional housing and rapid-rehousing programs and permanent supportive housing especially for chronically homeless persons. The City will continue to support and participate in the Comal County Homeless Coalition's planning process in an effort to expand homeless services and shelter/housing. No public facility funds for the emergency shelter have been allocated for PY23. The City will support the first Outreach program in the city, and social service agencies providing services to those experiencing homelessness when funds are available, and projects are financially feasible. Outcome: During PY23, approximately 50 homeless individuals will be served by the Outreach program. Approximately 400 adults will be provided with emergency shelter operated by NB Housing Partners. Approximately 500 women and children who are fleeing domestic violence situations will be provided with shelter by the Crisis Center of Comal County.

**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 2020-2024 Consolidated Plan. These projects would include but are not limited to community centers, parks, and emergency shelters. The City will provide the opportunity for a competitive grant process, or a City Council directed process to fund eligible public facility projects. During PY23, the City will fund projects for Connections Individual and Family Services, Crisis Center of Comal County, and CASA of Central Texas. Outcome: Approximately 751 children and adults will be provided with shelter during PY23.

**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, children's services, substance use disorders; supportive services for those experiencing homelessness; transportation assistance and food assistance is clearly identified in the 2020-2024 Consolidated Plan and expressed in meetings with stakeholders and comments from the general public. The City will continue to provide a competitive grant process, or a City Council directed process to fund eligible supportive service activities and agencies. Outcome: Approximately 710 low-moderate income New Braunfels residents will receive supportive services during PY23.

**Administration:** The City will continue to plan, monitor, and administer the HUD Entitlement Grant Programs and Fair Housing programs to ensure compliance with Federal Regulations. Outcome: Successful management of CDBG program.

### **3. Evaluation of past performance**

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

The City of New Braunfels recognizes the importance of maintaining appropriate performance measurements of its CDBG projects and program, including any funding provided for special circumstances such as response to COVID-19 (CDBG-CV funds). 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 PY23 Annual Action Plan and projects funded during the past six 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 was developed during the 2020-2024 Consolidated Planning process.

Efforts were made by the City to retain affordable housing stock by funding weatherization, and aging in place programs. These programs address the issues of deferred maintenance, needed energy improvements, and accessibility for low-income elderly and/or disabled homeowners. Fifty-Two (52) homeowners have been assisted in the past six years. Ten (10) apartments at a complex for low-moderate income renters used CDBG funds to provide improvements to the units.

In order to increase homeownership opportunities for low to moderate income first-time homebuyers, the City has funded down payment and closing costs assistance for nine (9) homebuyers.

The City has allocated funds for public facility/infrastructure projects. Funds were used to provide financial support for the acquisition of an emergency shelter for adults experiencing homelessness, provide improvements to the Westside Community Center, the Crisis Center of Comal County, and Solms Park.

During the past six years, the City has allocated 15% of the 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 to 363 households, 896 children received advocacy, mentoring, and supportive services, 1,578 households received emergency food assistance, 386 elderly housebound residents were provided with Meals on Wheels, 158 residents utilized a community counseling program. CDBG grants provided case management and supportive services to 156 unaccompanied homeless children and youth, case management to 8 adults living in transitional housing and supportive services to 124 adults experiencing homelessness.

The City received a total of \$666,921 in CDBG-CV allocations from HUD, and also allocated \$68,923 from previously unallocated CDBG funds in order to provide grants for a total of \$735,844 to local non-profit agencies for their CDBG-CV eligible projects after a competitive application process. A total of 2,983 residents received assistance for issues related to COVID-19. The City has expended 89% of the total funds and is on target for meeting the timeline for expenditures and the proposed accomplishments for all awarded funding.

#### **4. Summary of Citizen Participation Process and consultation process**

Summary from citizen participation section of plan.

The citizen participation process is an on-going process whereby the City attempts to involve the residents and stakeholders in its CDBG planning and activities to the greatest extent possible. The City has an established Community Development Advisory Committee (CDAC) that meets monthly discuss and review current CDBG projects as well as reviewing applications for CDBG funding and providing funding recommendations to City Council. The 9-member CDAC is comprised of various community residents who have knowledge of and interest in providing housing and services to the low-moderate residents of New Braunfels as well as improvements in the low-moderate income areas of the City. Meeting notices are posted at City Hall and the City's website, so residents can attend the meetings.

The City held a Stakeholder Meeting on April 13, 2023, with 9 participants representing 6 agencies and a City resident provided input for the PY23 Annual Action Plan. A meeting was held with the Comal County Homeless Coalition on June 13, 2023, to discuss the needs of those experiencing homelessness or at risk of homelessness. Discussions were conducted with the New Braunfels MLK Association and with the League of Latin American Citizens (LULAC) with the purpose of identifying needs, barriers to housing and services and priorities of the minority populations in New Braunfels. Public hearings on the draft Action Plan were held at the Westside Community Center, a City-owned and operated community center located in a low-mod income area, on June 13, 2023, and at the City Council meeting on June 26, 2023. All meetings and public hearings are held in an accessible and convenient locations to accommodate and encourage attendance. Additionally, a survey in English and Spanish was available to all residents on the City's CDBG website from May 1, 2023, through June 30, 2023.

Notices were placed in the local newspaper and on the City's website of the availability of the draft Annual Action Plan on June 3, 2023. The 30-day comment period was from June 6, 2023, through July 6, 2023. The draft PY23 Annual Action Plan was available on the City's website on June 6, 2023, and printed copies were available at City Hall and the New Braunfels Public Library during the 30-day comment period.

#### **5. Summary of public comments**

This could be a brief narrative summary or reference an attached document from the Citizen Participation section of the Con Plan.

A summary of the comments received for the PY23 Action Plan 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 accepts all written and verbal comments and views presented. Comments related to the CDBG program are reviewed and responded to by City staff as quickly as possible. Comments received by CDBG staff related to other matters of the City are referred to the appropriate department.

## **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. Detailed descriptions of the funded activities can be found at AP-35. The City has reviewed the Build American-Buy American (BABA) requirements and no PY23 projects meet the criteria to trigger BABA requirements.

During PY23, the City's CDBG program will fund the following projects:

### Public Services:

Big Brothers Big Sisters: \$10,000

CASA of Central Texas: \$12,332

Crisis Center of Comal County: \$10,000

Family Life Center: \$7,500

NB Housing Partners: \$6,000

River City Advocacy: \$8,000

San Antonio Food Bank: \$9,000

The Salvation Army: \$6,000

### Public Facilities:

CASA of Central Texas: \$51,562

Crisis Center of Comal County: \$125,000

Connections Individual and Family Services, Inc.: \$100,000

### Housing:

City of New Braunfels - Minor Home Repair Program: \$109,900

Annual Action Plan  
2023

Comal County Habitat for Humanity - Home Repair Program: \$21,710

Administration: \$91,776

## **PR-05 Lead & Responsible Agencies – 91.200(b)**

### **1. Agency/entity responsible for preparing/administering the Consolidated Plan**

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

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

**Table 1 – Responsible Agencies**

### **Narrative (optional)**

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**

Sandy Paulos, Director of Finance

SPaulos@newbraunfels.gov

Phone Number 830-221-4387

Jennifer Gates, Grants Coordinator

JGates@newbraunfels.gov

Phone Number 830-221-4383

## **AP-10 Consultation – 91.100, 91.200(b), 91.215(l)**

### **1. Introduction**

The CDBG division of the Finance Department coordinates CDBG-related activities with multiple city departments, including City Administration, Library, Parks & Recreation, Public Works, and Planning divisions of the City as well as the City Council.Â In addition, the City consulted citizens and entities to ensure funding priorities are aligned with the city's community needs. One of the effects of New Braunfels' relative size is that it must rely on the activities of other organizations for addressing the needs of the low-income, homeless, and special needs populations. As a result, the City actively consulted with 31 state, regional, county, and local entities in the development of the PY23. During the year, City staff meet informally with agencies and citizens of New Braunfels and consider their input and concerns when developing the Action Plan. During the development phase of the PY23 Annual Action Plan, the City made contact with multiple agencies and created partnerships to assist in the City's community development needs.Â Â The coordinated efforts are continuing with citizens, non-profit social service providers, non-profit housing providers, a local foundation, the New Braunfels Housing Authority, City Departments, and various levels of government.Â Â

### **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(l))**

The City continues to pursue and maintain relationships with key community stakeholders and leaders in New Braunfels.Â The Community Development Advisory Board members are also involved in promoting the CDBG program and soliciting input from their circle of professional and personal contacts.Â Through public hearings and stakeholder meetings held throughout the year, the City continues to utilize a network of contacts, referrals, and partnerships to implement the strategies outlined in the 2020-2024 Consolidated Plan and re-enforced in the PY23 Annual Action Plan. Â The City will continue to build its relationship with local housing and service providers, the Workforce Housing Advisory Committee, LULAC and the New Braunfels MLK Association, and the New Braunfels 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.Â The Next Step is a collaboration between NB Housing Partners, Crisis Center of Comal County, and Hill Country MHDD.Â The City will support this collaboration with PY23 funding for an outreach program.Â Â Part of the projectâ€s goals are also to strengthen the communityâ€s capacity to provide affordable housing options as well a full spectrum of mental health services and treatment. While the local mental health authority has quality outpatient services, the volume of outpatient services does not fully cover a rapidly growing county population. Currently, Comal County does not offer any inpatient mental health; however, the County has approved funding for the construction of a new mental health extended observation unit/crisis residential unit facility in New Braunfels.

**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 Texas Homeless Network provides data analysis from the Homeless Management Information System (HMIS), Point-In-TimeÂ Count (PIT), the Housing Inventory Count (HIC), and the Annual Homeless Assessment Report (AHAR) for planning and information purposes.Â 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.Â The local Comal County Homeless Coalition (Homeless Coalition) is part of the Texas Balance of State Continuum of Care that is managed by the Texas Homeless Network.Â The Homeless Coalition consists of community organizations such as local non-profit public service providers, two school districts, Comal County, and the City of New Braunfels, meeting monthly to discuss and strategize on ways to meet the needs of those experiencing homelessness in the city and county.Â The Cityâ¿s Grants Coordinator, Outreach Coordinator of Westside Community Center, and representatives from the Police Department are active in the coalition.

In the past, the City of New Braunfelsâ¿s primary response to local homelessness has been through its participation in the Comal County Homeless Coalition. Since PY20 the City has taken a more active role in addressing the issues of homelessness and provided CDBG and CDBG-CV funds to NB Housing Partners to assist with operations of an emergency homeless shelter.Â

The City has also funded an emergency rent and utility programs to subrecipients for the past five years and will fund a program for PY23.Â The CDBG funds are used to prevent eviction and the discontinuation of utilities that could result in homelessness for the household.Â

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

The City of New Braunfels is not a recipient of ESG funds directly from HUD or from the State.Â The City was provided data from the Homeless Management Information system (HMIS), Point-In-TimeÂ Count (PIT), the Housing Inventory County, and the Annual Homeless Assessment Report (AHAR) that has assisted in developing plans and activities using CDBG funding.Â Several local agencies use the HMIS system including the homeless shelter resulting in the City receiving current and accurate date regarding the homeless population.Â The Crisis Center of Comal County is prohibited by law from utilizing HMIS but does maintain a data base exclusively for agencies and shelters serving victims of domestic violence and sexual assault and provides data on an aggregate basis.

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

**Table 2 – Agencies, groups, organizations who participated**

1	<b>Agency/Group/Organization</b>	SAN ANTONIO FOOD BANK
	<b>Agency/Group/Organization Type</b>	Services-Children Services-Elderly Persons Services-Persons with Disabilities Services-Persons with HIV/AIDS Services-homeless
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Homeless Needs - Families with children Homelessness Needs - Veterans Non-Homeless Special Needs Households with Food Insecurity
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Agency staff attended the stakeholder's meeting where needs, gaps in services and priorities were discussed. Agency provided information on the number of New Braunfels residents that are experiencing food insecurity. Agency is a recipient of CDBG funds and provided monthly status reports on beneficiaries and needs during PY22. The anticipated outcome was met providing information for the Annual Action Plan.
2	<b>Agency/Group/Organization</b>	Connections Individual and Family Services, Inc.
	<b>Agency/Group/Organization Type</b>	Housing Services - Housing Services-Children Services-homeless Child Welfare Agency

	<p><b>What section of the Plan was addressed by Consultation?</b></p> <p>Housing Need Assessment Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Unaccompanied youth Homelessness Strategy</p>
	<p><b>Briefly describe how the Agency/Group/Organization was consulted.</b></p> <p><b>What are the anticipated outcomes of the consultation or areas for improved coordination?</b></p> <p>Agency staff attended the stakeholder's meeting where needs, gaps in services and priorities were discussed. Agency is an active member of the Comal County Homeless Coalition and provided input during the City's meeting with the Coalition. Information provided on emergency shelter for children and youth, including placement by Child Protective Services; issues of children aging out of foster care; and service needs of this population. Agency is a recipient of CDBG funds and provided monthly status reports during PY22. The anticipated outcome was met providing information for the Annual Action Plan.</p>
3	<p><b>Agency/Group/Organization</b></p> <p>Comal County Senior Citizens Foundation</p>
	<p><b>Agency/Group/Organization Type</b></p> <p>Services-Elderly Persons Services-Persons with Disabilities</p>
	<p><b>What section of the Plan was addressed by Consultation?</b></p> <p>Housing Need Assessment Non-Homeless Special Needs Anti-poverty Strategy</p>
	<p><b>Briefly describe how the Agency/Group/Organization was consulted.</b></p> <p><b>What are the anticipated outcomes of the consultation or areas for improved coordination?</b></p> <p>Agency staff attended the stakeholders meetings and provided information about senior needs, nutrition, the senior center, in-home assistance, accessibility issues and their minor home repair program. Agency is a recipient of CDBG funds and provided monthly status reports on beneficiaries during PY22. The anticipated outcome was met providing information for the Annual Action Plan.</p>

4	<b>Agency/Group/Organization</b> <b>Agency/Group/Organization Type</b>	Comal County Habitat for Humanity Housing Services - Housing
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Non-Homeless Special Needs Anti-poverty Strategy
	<b>Briefly describe how the Agency/Group/Organization was consulted.</b> <b>What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Agency staff attended a stakeholders meeting and the Homeless Coalition meeting where housing issues were discussed. Agency also provided information on the number and needs of low-income homeowners and first-time homebuyers. Agency is a recipient of CDBG funds and provided monthly status reports on beneficiaries during PY22. The anticipated outcome was met providing information for the Annual Action Plan.
5	<b>Agency/Group/Organization</b> <b>Agency/Group/Organization Type</b>	New Braunfels ISD Services-Children Services-homeless Services-Education
	<b>What section of the Plan was addressed by Consultation?</b>	Homeless Needs - Families with children Homelessness Needs - Unaccompanied youth Homelessness Strategy
	<b>Briefly describe how the Agency/Group/Organization was consulted.</b> <b>What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	The Homeless Liaison attended the meeting with the Comal County Homeless Coalition and also provided information on the needs of children and youth experiencing homelessness and those in foster care. The anticipated outcome was met providing information for the Annual Action Plan.

6	<b>Agency/Group/Organization</b>	Comal County ISD
	<b>Agency/Group/Organization Type</b>	Services-Children Services-homeless Services-Education
	<b>What section of the Plan was addressed by Consultation?</b>	Homeless Needs - Chronically homeless Homelessness Needs - Unaccompanied youth Homelessness Strategy
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	The Homeless Liaison attended the meeting with the Comal County Homeless Coalition and also provided information on the needs of children and youth experiencing homelessness and those in foster care. The anticipated outcome was met providing information for the Annual Action Plan.
7	<b>Agency/Group/Organization</b>	CASA of Central Texas Inc.
	<b>Agency/Group/Organization Type</b>	Services-Children Services-Victims of Domestic Violence Services - Victims
	<b>What section of the Plan was addressed by Consultation?</b>	Homelessness Needs - Unaccompanied youth Non-Homeless Special Needs Children in the Court Welfare System
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	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 is a recipient of CDBG funds and provided monthly status reports on beneficiaries during PY22. The anticipated outcome was met providing information for the Annual Action Plan.

8	<b>Agency/Group/Organization</b> <b>Agency/Group/Organization Type</b>	River City Advocacy Services-Elderly Persons Services-Persons with Disabilities Services-Persons with HIV/AIDS Services-Victims of Domestic Violence Services-Health
	<b>What section of the Plan was addressed by Consultation?</b>	Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Strategy Mental Health needs
	<b>Briefly describe how the Agency/Group/Organization was consulted.</b> <b>What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Agency attended a stakeholder meeting and is currently funded by CDBG for PY 22 and provides information and statistics monthly on the mental health needs of low-moderate income New Braunfels residents. The anticipated outcome for information for the Annual Action Plan was met.
9	<b>Agency/Group/Organization</b> <b>Agency/Group/Organization Type</b>	Family Life Center Housing Services - Housing Services-Elderly Persons Services-Persons with Disabilities Services-Persons with HIV/AIDS Services-Victims of Domestic Violence Services-homeless
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Homelessness Strategy Non-Homeless Special Needs Anti-poverty Strategy

	<p><b>Briefly describe how the Agency/Group/Organization was consulted.</b></p> <p><b>What are the anticipated outcomes of the consultation or areas for improved coordination?</b></p>	Agency staff attended the stakeholder meeting and the Comal County Homeless Coalition Action Plan meetings. Agency is currently funded with CDBG for PY 22 and provides monthly information on their emergency rent and utility assistance program as well as case management program. The anticipated outcome of information for the Annual Action Plan was met.
10	<b>Agency/Group/Organization</b>	Hill Country Community MHDD Center
	<b>Agency/Group/Organization Type</b>	Services-Children Services-Elderly Persons Services-Persons with Disabilities Services-Victims of Domestic Violence Services-homeless Services-Health Health Agency
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Homelessness Strategy Non-Homeless Special Needs
	<p><b>Briefly describe how the Agency/Group/Organization was consulted.</b></p> <p><b>What are the anticipated outcomes of the consultation or areas for improved coordination?</b></p>	Agency participated in the Action Plan meeting with the Comal County Homeless Coalition and provided information the needs of people with mental illness and developmental disabilities. The anticipated outcome was met providing information and data for the Annual Action Plan.
11	<b>Agency/Group/Organization</b>	City of New Braunfels Police Department
	<b>Agency/Group/Organization Type</b>	Other government - Local Law Enforcement Grantee Department

	<p><b>What section of the Plan was addressed by Consultation?</b></p> <p>Homeless Needs - Chronically homeless Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Homelessness Strategy</p>
	<p><b>Briefly describe how the Agency/Group/Organization was consulted.</b></p> <p><b>What are the anticipated outcomes of the consultation or areas for improved coordination?</b></p> <p>The Police Department regularly attend and is an active member of the Comal County Homeless Coalition. They participated in the Action Plan meeting with the Comal County Homeless Coalition and provided information on their work with the homeless population and the efforts between the homeless shelter and the Police Department. The anticipated outcome was met providing information and data for the Annual Action Plan.</p>
12	<b>Agency/Group/Organization</b>
	<b>Agency/Group/Organization Type</b>
	<p><b>What section of the Plan was addressed by Consultation?</b></p> <p>Housing Need Assessment Homelessness Strategy Non-Homeless Special Needs Anti-poverty Strategy</p>
	<p><b>Briefly describe how the Agency/Group/Organization was consulted.</b></p> <p><b>What are the anticipated outcomes of the consultation or areas for improved coordination?</b></p> <p>Foundation staff attended the stakeholder meeting and the Comal County Homeless Coalition Action Plan meeting. The McKenna Foundation works with local housing and service providers and facilitates interaction and cooperation between agencies and the City. The anticipated outcome of information for the Annual Action Plan was met.</p>
13	<b>Agency/Group/Organization</b>
	<p><b>Agency/Group/Organization Type</b></p> <p>Housing Services - Housing Services-homeless</p>

	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Homeless Needs - Families with children Homelessness Strategy
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Agency participated in the Action Plan meeting with the Comal County Homeless Coalition and provided information the housing and services need of families with children who are experiencing homelessness. The anticipated outcome was met providing information and data for the Annual Action Plan.
14	<b>Agency/Group/Organization</b>	Crisis Center of Comal County
	<b>Agency/Group/Organization Type</b>	Housing Services - Housing Services-Children Services-Victims of Domestic Violence Services-homeless Services - Victims
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Homeless Needs - Families with children Homelessness Strategy Non-Homeless Special Needs
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Agency staff attended the stakeholder meeting and the Comal County Homeless Coalition Action Plan meeting and has provided statistics on domestic violence in New Braunfels as well as the needs and priorities for this population. The anticipated outcome of information for the Annual Action Plan was met.
15	<b>Agency/Group/Organization</b>	Community Development Advisory Committee
	<b>Agency/Group/Organization Type</b>	Planning organization Business and Civic Leaders City Council Appointed Committee

	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Homelessness Strategy Non-Homeless Special Needs Anti-poverty Strategy Provides funding recommendations to City Council
	<b>Briefly describe how the Agency/Group/Organization was consulted.</b> <b>What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	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	<b>Agency/Group/Organization</b>	United Way of Comal County
	<b>Agency/Group/Organization Type</b>	Planning organization
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Non-Homeless Special Needs Anti-poverty Strategy
	<b>Briefly describe how the Agency/Group/Organization was consulted.</b> <b>What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Information was gathered from their website and from Comal County Needs Assessment report. The anticipated outcome of information for the Annual Action Plan was met.
17	<b>Agency/Group/Organization</b>	Comal County Health Department
	<b>Agency/Group/Organization Type</b>	Services-Health Health Agency
	<b>What section of the Plan was addressed by Consultation?</b>	Non-Homeless Special Needs Lead-based Paint Strategy

	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	The Health Department provided information and data reports. Primary purpose of having accurate data for the Annual Action Plan on the occurrences of lead-based paint hazards and cases was met.
18	<b>Agency/Group/Organization</b>	Methodist Healthcare Ministries of South Texas
	<b>Agency/Group/Organization Type</b>	Services-homeless Services-Health
	<b>What section of the Plan was addressed by Consultation?</b>	Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Homelessness Strategy Homeless Population Health Needs
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	The agency provides a Wesley nurse in the New Braunfels area. She is active in the Comal County Homeless Coalition and attended the Action Plan meeting with the Coalition. She provided information on the health needs of low-moderate income and homeless people. The anticipated outcome was met by providing information on health needs and discharge planning.
19	<b>Agency/Group/Organization</b>	Comal County Sheriff's Department
	<b>Agency/Group/Organization Type</b>	Other government - County
	<b>What section of the Plan was addressed by Consultation?</b>	Homeless Needs - Chronically homeless Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth

	<p><b>Briefly describe how the Agency/Group/Organization was consulted.</b></p> <p><b>What are the anticipated outcomes of the consultation or areas for improved coordination?</b></p>	The Sheriff's Department manages the county jail. Coalition members and Sheriff Department staff work together to help the unsheltered homeless population and have and will continue to discuss discharge planning for newly released inmates. The City of New Braunfels does not operate a city jail. The anticipated outcome was met by providing information on homelessness and county law enforcement.
20	<b>Agency/Group/Organization</b>	New Braunfels MLK Association
	<b>Agency/Group/Organization Type</b>	Planning organization Local Organization
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Non-Homeless Special Needs
	<p><b>Briefly describe how the Agency/Group/Organization was consulted.</b></p> <p><b>What are the anticipated outcomes of the consultation or areas for improved coordination?</b></p>	Agency provided information on the housing, services and neighborhood needs of African Americans residing in New Braunfels. The anticipated outcome was met by providing information for the PY23 Action Plan on minority needs.
21	<b>Agency/Group/Organization</b>	LULAC Council #4217
	<b>Agency/Group/Organization Type</b>	Planning organization Local Organization
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Non-Homeless Special Needs
	<p><b>Briefly describe how the Agency/Group/Organization was consulted.</b></p> <p><b>What are the anticipated outcomes of the consultation or areas for improved coordination?</b></p>	Agency provided information on the housing, services and neighborhood needs of Hispanic residents in New Braunfels. The anticipated outcome was met by providing information for the PY23 Action Plan on minority needs.

22	<b>Agency/Group/Organization</b>	Comal County Probation
	<b>Agency/Group/Organization Type</b>	Other government - State Other government - County
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Non-Homeless Special Needs
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	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 Annual Action Plan was met.
23	<b>Agency/Group/Organization</b>	City of New Braunfels City Council
	<b>Agency/Group/Organization Type</b>	Other government - Local Planning organization Business and Civic Leaders Elected Officials
	<b>What section of the Plan was addressed by Consultation?</b>	Goals, Priorities and Project Funding for PY 23
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Presentations by staff started in June continued through July when the City Council approved the Annual Action Plan. The Council provided guidance in identifying priorities and approved CDBG funding for the Annual Action Plan. The anticipated outcome of having viable plan and funding decisions approved by City Council was met.
24	<b>Agency/Group/Organization</b>	Community Solutions TX
	<b>Agency/Group/Organization Type</b>	CDBG Consultant for City of New Braunfels

	<p><b>What section of the Plan was addressed by Consultation?</b></p> <p>Housing Need Assessment Homelessness Strategy Non-Homeless Special Needs Anti-poverty Strategy</p>
	<p><b>Briefly describe how the Agency/Group/Organization was consulted.</b></p> <p><b>What are the anticipated outcomes of the consultation or areas for improved coordination?</b></p> <p>Community Solutions TX provides consulting services to the City of New Braunfels in the development and management of the CDBG program. The anticipated outcome is the development of a viable PY23 Annual Action Plan.</p>
25	<p><b>Agency/Group/Organization</b></p> <p>The Salvation Army</p>
	<p><b>Agency/Group/Organization Type</b></p> <p>Housing Services - Housing Services-Elderly Persons Services-Persons with Disabilities Services-Persons with HIV/AIDS Services-Victims of Domestic Violence Services-homeless</p>
	<p><b>What section of the Plan was addressed by Consultation?</b></p> <p>Housing Need Assessment Homeless Needs - Chronically homeless Homelessness Strategy</p>
	<p><b>Briefly describe how the Agency/Group/Organization was consulted.</b></p> <p><b>What are the anticipated outcomes of the consultation or areas for improved coordination?</b></p> <p>Agency provided information through the stakeholders meeting and homeless coalition meetings; agency is a recipient of PY22 CDBG funds and provides monthly reports and statistics to the City. The anticipated outcome of having current information for the development of the Annual Action Plan was met.</p>

26	<b>Agency/Group/Organization</b>	Homeless Network of Texas dba Texas Homeless Network
	<b>Agency/Group/Organization Type</b>	Housing Planning organization Statewide Planning Organization for the Balance of State Continuum of Care
	<b>What section of the Plan was addressed by Consultation?</b>	Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Homelessness Strategy
	<b>Briefly describe how the Agency/Group/Organization was consulted.</b> <b>What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Statewide planning non-profit that manages the Texas Balance of State Continuum of Care. Agency provides HIMS data and management for local grantees; data analysis of PIT count and housing inventory and provides technical assistance to the homeless coalition and agencies that receive HUD CoC funding. The anticipated outcome was met by providing data and information for the Homeless Section of the Action Plan.
	<b>Agency/Group/Organization</b>	BIG BROTHERS BIG SISTERS OF SOUTH TEXAS - BRAZOS
27	<b>Agency/Group/Organization Type</b>	Services-Children
	<b>What section of the Plan was addressed by Consultation?</b>	Non-Homeless Special Needs
	<b>Briefly describe how the Agency/Group/Organization was consulted.</b> <b>What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Agency provided information through the stakeholders meeting and homeless coalition meetings; agency is a recipient of PY22 CDBG funds and provides monthly reports and statistics to the City on the needs of at-risk children. The anticipated outcome of having current information for the development of the Annual Action Plan was met.
	<b>Agency/Group/Organization</b>	Alamo Area Council of Governments
28	<b>Agency/Group/Organization Type</b>	Regional organization Planning organization

	<p><b>What section of the Plan was addressed by Consultation?</b></p> <p>Market Analysis Economic Development Anti-poverty Strategy</p>
	<p><b>Briefly describe how the Agency/Group/Organization was consulted.</b></p> <p><b>What are the anticipated outcomes of the consultation or areas for improved coordination?</b></p> <p>Regional planning agency providing information and access to funding for projects and collaboration with other governmental entities in the area. The anticipated outcome was met by providing information and data for the Annual Action Plan.</p>
29	<p><b>Agency/Group/Organization</b></p> <p>Workforce Housing Advisory Committee</p>
	<p><b>Agency/Group/Organization Type</b></p> <p>Housing Business and Civic Leaders City Council Appointed Committee</p>
	<p><b>What section of the Plan was addressed by Consultation?</b></p> <p>Housing Need Assessment Market Analysis</p>
	<p><b>Briefly describe how the Agency/Group/Organization was consulted.</b></p> <p><b>What are the anticipated outcomes of the consultation or areas for improved coordination?</b></p> <p>City Council appointed committee of 15 New Braunfels representatives from the Community Development Advisory Committee, Four Rivers Association of Realtors, GNB Home Builders Association, local bank or mortgage lending industry, McKenna Foundation, GNB Chamber of Commerce, NBEDC, NB Housing Authority, New Braunfels Utilities, Planning Commission, NB Housing Partnership, and Habitat for Humanity; plus 3 at-large members to will raise awareness about the challenges of affordable and available workforce housing and to advise the City Council on providing solutions for a full range of workforce housing choices for households of all incomes, ages, and abilities. The anticipated outcome of providing information on affordable housing and workforce housing for the Annual Action Plan was met.</p>

30	<b>Agency/Group/Organization</b> <b>Agency/Group/Organization Type</b>	NB Housing Partners  Housing Services - Housing Services-homeless
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Homelessness Strategy
31	<b>Briefly describe how the Agency/Group/Organization was consulted.</b> <b>What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	NB Housing Partners provides the only emergency shelter and services for single adults experiencing homelessness. The agency receives PY22 CDBG funding and provides monthly information and statistics on the homeless population in New Braunfels. The anticipated outcome was met by providing information and data on the adult homeless population and their housing and service needs.
	<b>Agency/Group/Organization</b> <b>Agency/Group/Organization Type</b>	Comal County Homeless Coalition  Housing Planning organization
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Homelessness Strategy

	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	The member agencies of the Comal County Homeless Coalition provided information on their programs and the needs of the populations they serve. The Coalition conducts a PIT count every January and provides information on the number and nature of homelessness. The anticipated outcome was met by the data provided.
32	<b>Agency/Group/Organization</b>	City of New Braunfels Economic and Community Development Department
	<b>Agency/Group/Organization Type</b>	Other government - Local Grantee Department
	<b>What section of the Plan was addressed by Consultation?</b>	Market Analysis Economic Development Anti-poverty Strategy
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	City staff members of the Economic and Community Development Department provided information about coordinated work with local broadband and internet service providers, other City departments, the New Braunfels Economic Development Corporation, and New Braunfels Utilities (NBU) to assess the need for reliable broadband for the City's residents, especially those in low-mod income households. The anticipated outcome was met by providing information and data for the Annual Action Plan.
33	<b>Agency/Group/Organization</b>	City of New Braunfels Fire Department
	<b>Agency/Group/Organization Type</b>	Other government - Local Grantee Department
	<b>What section of the Plan was addressed by Consultation?</b>	Emergency Management

	<p><b>Briefly describe how the Agency/Group/Organization was consulted.</b></p> <p><b>What are the anticipated outcomes of the consultation or areas for improved coordination?</b></p>	<p>The City's Emergency Management Coordinator (EMC) for the City of New Braunfels Fire Department provided information about the City's efforts for resiliency from events such as natural disasters e.g., flooding and winter storms, and public health emergencies e.g., COVID-19 coronavirus. In collaboration with other City staff, the EMC has developed coordinated response plans and associated agreements with many local, regional, state, and federal groups to assist the City's residents before, during, and after emergency events. The anticipated outcome was met by providing information and data for the Annual Action Plan.</p>
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#### **Identify any Agency Types not consulted and provide rationale for not consulting**

No agencies were excluded from participating in the public hearings, stakeholders meeting, attending any monthly meetings of the Community Development Advisory Committee, providing written information or meeting with staff when requested.

#### **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 information provided by the Coalition and the Balance of State Continuum of Care as a reference, the City has aligned the goals in the homeless section of the Annual Action Plan.
Comprehensive Plan	City of New Braunfels	The long-range plans in the Comprehensive Plan support the goals in the Annual Action Plan by addressing affordable housing and activities that enhance the livability and desirability of New Braunfels
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 Annual Action Plan and affordable housing programs

Name of Plan	Lead Organization	How do the goals of your Strategic Plan overlap with the goals of each plan?
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 Annual Action Plan
TX 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 as well as statewide statistics, needs, priorities and goals

**Table 3 – Other local / regional / federal planning efforts**

**Narrative (optional)**

The City of New Braunfels has included agencies, residents, and organizations in the development of the PY23 Annual Action Plan to develop a plan that truly reflects the needs and priorities identified in the 2020-2024 Consolidated Plan. Through the Alamo Area Council Governments, New Braunfels works in collaboration with other governmental entities in the area.

## **AP-12 Participation – 91.105, 91.200(c)**

### **1. Summary of citizen participation process/Efforts made to broaden citizen participation**

#### **Summarize citizen participation process and how it impacted goal-setting**

The City of New Braunfels Citizen Participation Plan encourages participation of all residents, especially the low and moderate-income population. Formal and informal approaches are used each year in the assessment process to provide adequate opportunities for citizens to participate in the development of the Consolidated Plan and the Annual Action Plans. These actions include placing public notices in the New Braunfels Herald-Zeitung, the City's local newspaper, meetings with stakeholders, one-on-one interviews, information provided on social media and appointment of citizens to the Community Development Advisory Committee (CDAC) by City Council, and public hearings at city council meetings and other locations. All meetings are held in accessible locations with interpreters available upon request.

The CDAC consists of nine New Braunfels residents appointed by the City Council to staggered three-year terms. CDAC serves in an advisory capacity to the CDBG program in addition to reviewing applications for CDBG funding and making funding recommendations to City Council. Meetings are advertised to the public via postings at the City Hall and the City's website and are open to the public.

A workshop for CDBG funds was held on February 15, 2023. There was a CDBG presentation and handouts included the application and information sheet. The application was also available on the City's website. There was a public notice advertised in the local newspaper and on the City's website, and notices were also emailed to local service agencies prior to the meeting encouraging agencies to send representatives to the pre-application workshop.

A Stakeholders meeting was held on April 13, 2023, to solicit input on community and housing needs from service and housing providers. The meeting was open to agencies and residents and advertised on the City's website and through email. Nine representatives from six agencies and a City resident participated in the meeting. City staff provided a presentation on June 20, 2023, to the Comal County Homeless Coalition on the Action Plan and to discuss the housing and service needs of people experiencing homelessness. Coalition members and representatives from housing and service agencies participated. The Homeless Coalition meeting could be attended either in person or virtually.

Public Hearings were held on June 13, 2023, at the Westside Community Center located in a low-moderate income area and June 26, 2023, at a regularly scheduled meeting of the City Council at City Hall. A thirty-day comment period was held to allow public review of the PY23 Annual

Action Plan draft from June 6, 2023, through July 6, 2023. The draft plan was available in English on the City's website and paper copies could be viewed at City Hall and the New Braunfels Public Library. Additionally, the draft plan was available in Spanish upon request. The notices in English and Spanish were published in the local paper on June 3, 2023.

### 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	Housing and Services Agencies	Six agencies represented by nine staff.	Priorities are affordable housing, transportation, and affordable child care. See Citizens Comments Attachment for detailed information.	All comments were accepted.	
2	Citizen Survey on City Website	Non-targeted/broad community	Survey in English and Spanish on the City's website; response was not good and a different approach will be developed for the PY24 Action Plan.	Comments were received from two city residents. See Citizen Comments Attachment for detailed information.	All comments were accepted.	

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)
3	Public Comment Period	Non-targeted/broad community	Notices were placed on the City's website and in the local newspaper in English and Spanish.	One comment from a city resident was received and provided recommendations on several sections of the Action Plan. See Citizen Comments Attachments for detailed information.	All comments were accepted.	
4	Public Hearing	Non-targeted/broad community	Westside Community Center	Two residents attended and expressed a need for affordable housing and public transportation services.	All comments were accepted.	

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)
5	Public Meeting	Homeless Housing & Services Providers	Fourteen housing and services agencies attended the meeting.	Agencies expressed a need for affordable housing, expanded transitional housing, affordable child care, and transportation. See Citizen Comments Attachment for detailed information.	All comments were accepted.	
6	Public Hearing	Non-targeted/broad community	Public Hearing at the City Council meeting on June 26, 2023; Eight agencies recommended by CDAC for funding were in attendance.	Comments were received from the agencies thanking CDAC and the City Council for their support.	All comments were accepted.	

**Table 4 – Citizen Participation Outreach**

## Expected Resources

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

#### Introduction

The City of New Braunfels will receive \$458,880 for PY23 with reallocated funds from PY21 of \$45,107.92 and PY22 of \$64,792.08 for a total of \$568,780. Project funding for PY23 projects is a total of \$568,780 utilizing all of the PY23 grant funds of \$458,880 and \$109,900 of unallocated PY21 and PY22 funds.

#### 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	458,880.00	0.00	109,900.00	568,780.00	458,880.00	The PY23 CDBG allocation is \$458,880 with reallocated funds from PY21 of \$45,107.92 and PY22 of \$64,792.08 for a total of \$568,780. Amount expected for the remainder of the Con Plan is based on the PY23 allocation times the 1 remaining year of the Con Plan

Table 5 - Expected Resources – Priority Table

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

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 the City Council. For PY23, CDBG will provide \$68,832 for activities that support public services. The agencies will provide \$10,949,328 in funding for their programs resulting in CDBG being 0.62% of the total funding. Additionally, CDBG will provide \$276,562 for PY23 public facility projects. The agencies will provide \$8,166,803 in funding for their projects resulting in CDBG being 3.28% of the total funding. Comal County Habitat for Humanity's Weatherization and Aging in Place program will receive \$21,710 in CDBG funds with the agency and provide \$65,725 of their budgeted funds resulting in CDBG being 24.83% of the total funding. For the non-CDBG funded portion of their activities, the non-profit subrecipients will use alternate funding sources such as foundation, state, and federal funding to support their programs and projects. The Minor Home Repair Program managed by the City of New Braunfels will receive 100% CDBG funding of \$109,900.

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 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 parks and public facilities in low-mod areas to improve the quality of life for residents. For PY23, no CDBG funds were awarded for City projects utilizing publicly owned land or property.

**Discussion**

In addition to CDBG, City general funds and other state and federal funds are used to support city projects in in low-moderate income areas. CDBG funds may be the sole funding source for some subrecipient housing and public facility projects serving special populations or 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
2	HOUSING NEEDS (HN) 1.2	2020	2024	Affordable Housing	City Wide	HOUSING NEEDS	CDBG: \$21,710.00	Homeowner Housing Rehabilitated: 2 Household Housing Unit
3	HOUSING NEEDS (HN) 1.3	2020	2024	Affordable Housing	City Wide	HOUSING NEEDS	CDBG: \$109,900.00	Homeowner Housing Rehabilitated: 10 Household Housing Unit
8	PUBLIC FACILITIES (SLE) 2.1	2020	2024	Non-Housing Community Development	City Wide	PUBLIC FACILITIES & INFRASTRUCTURE	CDBG: \$276,562.00	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 816 Persons Assisted
10	PUBLIC SERVICES (SLE) 2.6	2020	2024	Non-Housing Community Development	City Wide	PUBLIC SERVICES	CDBG: \$10,000.00	Public service activities other than Low/Moderate Income Housing Benefit: 500 Persons Assisted
11	PUBLIC SERVICES (SLE) 2.7	2020	2024	Non-Housing Community Development	City Wide	PUBLIC SERVICES	CDBG: \$7,500.00	Homelessness Prevention: 1 Persons Assisted

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
12	PUBLIC SERVICES (SLE) 2.8	2020	2024	Non-Housing Community Development	City Wide	PUBLIC SERVICES	CDBG: \$8,000.00	Public service activities other than Low/Moderate Income Housing Benefit: 1 Persons Assisted
13	PUBLIC SERVICES (SLE) 2.9	2020	2024	Non-Housing Community Development	City Wide	PUBLIC SERVICES	CDBG: \$6,000.00	Public service activities other than Low/Moderate Income Housing Benefit: 8 Persons Assisted
14	PUBLIC SERVICES (SLE) 2.10	2020	2024	Non-Housing Community Development	City Wide	PUBLIC SERVICES	CDBG: \$12,332.00	Public service activities other than Low/Moderate Income Housing Benefit: 1 Persons Assisted
15	PUBLIC SERVICES (SLE) 2.11	2020	2024	Non-Housing Community Development	City Wide	PUBLIC SERVICES	CDBG: \$9,000.00	Public service activities other than Low/Moderate Income Housing Benefit: 234 Persons Assisted
16	PUBLIC SERVICES (SLE) 2.12	2020	2024	Non-Housing Community Development	City Wide	PUBLIC SERVICES	CDBG: \$6,000.00	Public service activities other than Low/Moderate Income Housing Benefit: 50 Persons Assisted
17	PUBLIC SERVICES (SLE) 2.13	2020	2024	Non-Housing Community Development	City Wide	PUBLIC SERVICES	CDBG: \$10,000.00	Public service activities other than Low/Moderate Income Housing Benefit: 85 Persons Assisted
21	ADMINISTRATION (AD) 5.1	2020	2024	Non-Housing Community Development	City Wide	ADMINISTRATION	CDBG: \$91,776.00	Other: 1655 Other

Table 6 – Goals Summary

Annual Action Plan  
2023

40

## Goal Descriptions

2	<b>Goal Name</b>	HOUSING NEEDS (HN) 1.2
	<b>Goal Description</b>	COMAL COUNTY HABITAT FOR HUMANITY - Weatherization and aging in place repairs including accessibility improvements for low-moderate income New Braunfels homeowners with properties inside the city limits
3	<b>Goal Name</b>	HOUSING NEEDS (HN) 1.3
	<b>Goal Description</b>	CITY OF NEW BRAUNFELS – Minor home repairs for low-moderate income New Braunfels homeowners with properties located within the city limits
8	<b>Goal Name</b>	PUBLIC FACILITIES (SLE) 2.1
	<b>Goal Description</b>	<p>Public facilities and infrastructure improvements for agencies providing services to low-moderate income residents of New Braunfels.</p> <p>Projects include:</p> <p>CASA OF CENTRAL TEXAS - \$51,562</p> <p>CRISIS CENTER OF COMAL COUNTY – Site Prep for New Shelter - \$125,000</p> <p>CONNECTIONS INDIVIDUAL AND FAMILY SERVICES – Building Futures Project - \$100,000</p>
10	<b>Goal Name</b>	PUBLIC SERVICES (SLE) 2.6
	<b>Goal Description</b>	CRISIS CENTER OF COMAL COUNTY - Case Management and services for individuals and children who have experienced domestic violence and/or sexual assault.

11	<b>Goal Name</b>	PUBLIC SERVICES (SLE) 2.7
	<b>Goal Description</b>	FAMILY LIFE CENTER - Homeless prevention activities including emergency rent and utility assistance to low-moderate income New Braunfels households.
12	<b>Goal Name</b>	PUBLIC SERVICES (SLE) 2.8
	<b>Goal Description</b>	RIVER CITY ADVOCACY - Mental health services including individual counseling, group counseling, and peer support groups for low-moderate income New Braunfels residents.
13	<b>Goal Name</b>	PUBLIC SERVICES (SLE) 2.9
	<b>Goal Description</b>	THE SALVATION ARMY - Case management and supportive services for persons residing in a homeless shelter and transitional housing.
14	<b>Goal Name</b>	PUBLIC SERVICES (SLE) 2.10
	<b>Goal Description</b>	CASA OF CENTRAL TEXAS - Advocacy and services for abused and/or neglected children that are in the child welfare, foster care and/or court systems.
15	<b>Goal Name</b>	PUBLIC SERVICES (SLE) 2.11
	<b>Goal Description</b>	NEW BRAUNFELS FOOD BANK (SAN ANTONIO FOOD BANK) - Food and household items assistance to low-moderate income New Braunfels households who are experiencing food insecurity.
16	<b>Goal Name</b>	PUBLIC SERVICES (SLE) 2.12
	<b>Goal Description</b>	NB HOUSING PARTNERS - Outreach program to identify and engage unsheltered homeless persons in services and housing programs.
17	<b>Goal Name</b>	PUBLIC SERVICES (SLE) 2.13
	<b>Goal Description</b>	BIG BROTHERS BIG SISTERS OF SOUTH TEXAS - Services for children and youth including mentoring programs, day care, after school programs and summer programs.
21	<b>Goal Name</b>	ADMINISTRATION (AD) 5.1
	<b>Goal Description</b>	CITY OF NEW BRAUNFELS ADMINISTRATION - Management and oversight of CDBG program including required HUD reporting, Fair Housing activities, and monitoring of subrecipients.



## Projects

### AP-35 Projects – 91.220(d)

#### Introduction

The City of New Braunfels will provide PY23 funding for activities that meet the needs and objectives established by its Consolidated Plan and approved by the City Council. The City will continue their commitment to providing supportive services, housing options and facility improvements to low-moderate income residents and in low-moderate income areas in New Braunfels. All of the CDBG funding awarded for PY23 has been allocated to public services, housing, public facilities and administration.

#### Projects

#	Project Name
1	CASA of Central Texas - Public Facilities Project
2	Crisis Center of Comal County - Public Facilities
3	Connections Individual and Family Services, Inc. - Public Facilities
4	Family Life Center
5	River City Advocacy & Counseling Program - Public Services
6	The Salvation Army - Public Services
7	CASA of Central Texas - Public Services
8	San Antonio Food Bank - Public Services
9	NB Housing Partners - Public Services
10	Crisis Center of Comal County - Public Services
11	Big Brother Big Sisters of South Texas - Public Services
12	Administration
13	Comal County Habitat for Humanity - Weatherization & Aging in Place Program
14	City of New Braunfels - Minor Home Repair Program

Table 7 - Project Information

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

The City of New Braunfels responds to the needs identified in the 2020 - 2024 Consolidated Plan and expressed in public hearings, stakeholder meetings and comments from residents. Affordable housing, childcare, and public transportation remain 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 to fund housing programs, supportive services for adults and children, mental health counseling, case management, and public facilities.

The lack of capacity of local agencies to develop and manage affordable housing programs and the lack of additional funding are the major obstacles faced by the City when meeting underserved needs. The City will continue to investigate funding opportunities as they are identified and to provide this information to their subrecipients.

## **AP-38 Project Summary**

### **Project Summary Information**

<b>1</b>	<b>Project Name</b>	CASA of Central Texas - Public Facilities Project
	<b>Target Area</b>	City Wide
	<b>Goals Supported</b>	PUBLIC FACILITIES (SLE) 2.1
	<b>Needs Addressed</b>	PUBLIC FACILITIES & INFRASTRUCTURE
	<b>Funding</b>	CDBG: \$51,562.00
	<b>Description</b>	Non-profit agency providing advocacy services for abused and/or neglected children that are in the child welfare and/or court systems through training of volunteers who serve as Court Appointed Special Advocates.
	<b>Target Date</b>	9/30/2024
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	It is estimated that 95 children who are in the child welfare and/or court system will receive advocacy services during PY23.
	<b>Location Description</b>	Office: 1619 Common Street, Suite 301, New Braunfels, TX 78130
<b>2</b>	<b>Planned Activities</b>	CASA will provide advocacy services and case management for abused and/or neglected children through recruiting, training and supervising volunteers who have been appointed by the Court to be Court Appointed Special Advocates. CDBG funds will be used to upgrade HVAC, install energy efficient lighting, and painting.
	<b>Project Name</b>	Crisis Center of Comal County - Public Facilities
	<b>Target Area</b>	City Wide
	<b>Goals Supported</b>	PUBLIC FACILITIES (SLE) 2.1
	<b>Needs Addressed</b>	PUBLIC FACILITIES & INFRASTRUCTURE
	<b>Funding</b>	CDBG: \$125,000.00
	<b>Description</b>	Non-profit agency providing services to women, children, and men of all ages. These services include 24-crisis line, shelter, counseling, support groups, legal advocacy, assistance with filing for child support, case-management, victims advocacy, transportation, information/referral, and community education/prevention.
	<b>Target Date</b>	9/30/2024

	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	It is estimated that 500 individuals and children will receive services during PY23.
	<b>Location Description</b>	Office: 1528 E. Common Street, New Braunfels, TX 78130
	<b>Planned Activities</b>	Crisis Center of Comal County will provide crisis and prevention services to victims of domestic violence and sexual assault while providing a safe environment where an individual can make educated, unbiased decisions about their future. CDBG funds will be used for site work for the new shelter. The project is not subject to BABA.
<b>3</b>	<b>Project Name</b>	Connections Individual and Family Services, Inc. - Public Facilities
	<b>Target Area</b>	City Wide
	<b>Goals Supported</b>	PUBLIC FACILITIES (SLE) 2.1
	<b>Needs Addressed</b>	PUBLIC FACILITIES & INFRASTRUCTURE
	<b>Funding</b>	CDBG: \$100,000.00
	<b>Description</b>	Non-Profit agency providing emergency shelter, transitional housing, case management and supportive services to at-risk children and youth in custody of Child Protective Services and runaway/homeless youth.
	<b>Target Date</b>	9/30/2024
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	It is estimated that 156 children and youth will receive shelter, transitional housing and supportive services during PY23.
	<b>Location Description</b>	The facility and offices are located at 705 Comal Avenue, New Braunfels, TX 78130
	<b>Planned Activities</b>	Connections will provide shelter and services for youth (ages 5-17) that are in the custody of Child Protective Services (CPS) and those that are runaway/homeless youth will continue in the old location. The transitional home accommodates youth (ages 15-21) who are in CPS custody and planning to transition out foster care to live independently. CDBG funds will be used in the construction of the new facility. The project is not subject to BABA.
<b>4</b>	<b>Project Name</b>	Family Life Center

	<b>Target Area</b>	City Wide
	<b>Goals Supported</b>	PUBLIC SERVICES (SLE) 2.7
	<b>Needs Addressed</b>	PUBLIC SERVICES
	<b>Funding</b>	CDBG: \$7,500.00
	<b>Description</b>	Non-Profit agency that assists individuals and families with a variety of services including, but not limited to, emergency rent and utility assistance, food, short-term prescription assistance, fuel cards, case management, budget classes with the goal of self-sufficiency.
	<b>Target Date</b>	9/30/2024
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	It is estimated that 20 households will receive services from Family Life Center during PY23.
	<b>Location Description</b>	Office: 444 East San Antonio Street, New Braunfels, TX 78130
	<b>Planned Activities</b>	Family Life Center provides a variety of services to households that are in a crisis situation where they are temporarily under-resourced. CDBG funds will be used for emergency rent and utility assistance.
5	<b>Project Name</b>	River City Advocacy & Counseling Program - Public Services
	<b>Target Area</b>	City Wide
	<b>Goals Supported</b>	PUBLIC SERVICES (SLE) 2.8
	<b>Needs Addressed</b>	PUBLIC SERVICES
	<b>Funding</b>	CDBG: \$8,000.00
	<b>Description</b>	Non-Profit agency providing free or sliding scale mental health counseling and peer support services to individuals who would not otherwise be able to afford mental health services. Target population are individuals, families and veterans who fall under the Federal Poverty Guidelines.
	<b>Target Date</b>	9/30/2024
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	It is estimated that 87 individuals will receive counseling and peer support during PY23.
	<b>Location Description</b>	1614 West San Antonio Street, New Braunfels, TX 78130

	<b>Planned Activities</b>	River City Advocacy will provide individual counseling and support services to income eligible individuals. CDBG funds will be used for salary support for contracted counselors.
<b>6</b>	<b>Project Name</b>	The Salvation Army - Public Services
	<b>Target Area</b>	City Wide
	<b>Goals Supported</b>	PUBLIC SERVICES (SLE) 2.9
	<b>Needs Addressed</b>	PUBLIC SERVICES
	<b>Funding</b>	CDBG: \$6,000.00
	<b>Description</b>	Non-Profit agency providing weekly food distribution, emergency assistance, life skill classes, hotel voucher for homeless prevention, transitional housing, and case management.
	<b>Target Date</b>	9/30/2024
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	It is estimated that eight adult males will participate in the transitional housing program during PY23.
	<b>Location Description</b>	Office: 617 Elliot Knox Blvd. New Braunfels, TX 78130
	<b>Planned Activities</b>	The Salvation Army will provide emergency assistance, transitional housing, supportive services, case management, meals and a food pantry to low-moderate income and homeless New Braunfels residents. CDBG funds will be used for salary support for the case manager, client transportation, ID procurement, and food assistance for individuals residing in the transitional housing program.
<b>7</b>	<b>Project Name</b>	CASA of Central Texas - Public Services
	<b>Target Area</b>	City Wide
	<b>Goals Supported</b>	PUBLIC SERVICES (SLE) 2.10
	<b>Needs Addressed</b>	PUBLIC SERVICES
	<b>Funding</b>	CDBG: \$12,332.00
	<b>Description</b>	Non-profit agency providing advocacy services for abused and/or neglected children that are in the child welfare and/or court systems through training of volunteers who serve as Court Appointed Special Advocates.
	<b>Target Date</b>	9/30/2024

	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	It is estimated that 95 children will receive advocacy services during PY23.
	<b>Location Description</b>	Office: 1619 Common Street, Suite 301, New Braunfels, TX 78130
	<b>Planned Activities</b>	CASA will provide advocacy services for abused and/or neglected children that are in the child welfare and/or court systems through training of volunteers who serve as Court Appointed Special Advocates. CDBG funds will be used for salary support for Case Supervisors.
<b>8</b>	<b>Project Name</b>	San Antonio Food Bank - Public Services
	<b>Target Area</b>	City Wide
	<b>Goals Supported</b>	PUBLIC SERVICES (SLE) 2.11
	<b>Needs Addressed</b>	PUBLIC SERVICES
	<b>Funding</b>	CDBG: \$9,000.00
	<b>Description</b>	Non-Profit agency that provides emergency food distribution including fresh and non-perishable food, household supplies, nutritional and meal planning classes, educational activities, and advocacy in an effort to address the issue of food insecurity and hunger.
	<b>Target Date</b>	9/30/2024
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	It is estimated that 234 households will receive food distribution and other services at the New Braunfels location and at mobile food pantries in New Braunfels during PY23.
	<b>Location Description</b>	Office and Facility: 1629 South Seguin, New Braunfels, TX 78130
	<b>Planned Activities</b>	The New Braunfels Food Bank, an extension of the San Antonio Food Bank, will provide food distribution and other services through the New Braunfels location and mobile food pantries in New Braunfels during PY23. CDBG funds will be used to purchase food and household items.
<b>9</b>	<b>Project Name</b>	NB Housing Partners - Public Services
	<b>Target Area</b>	City Wide
	<b>Goals Supported</b>	PUBLIC SERVICES (SLE) 2.12
	<b>Needs Addressed</b>	PUBLIC SERVICES
	<b>Funding</b>	CDBG: \$6,000.00

	<b>Description</b>	Non-Profit agency that advocates for and provides emergency shelter, supportive services, and case management for individuals and families in New Braunfels who are experiencing homelessness and/or housing instability.
	<b>Target Date</b>	9/30/2024
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	It is estimated that 50 people will receive outreach services during PY23.
	<b>Location Description</b>	Office: 801 West San Antonio Street, New Braunfels, TX 78130
	<b>Planned Activities</b>	NB Housing Partners will implement a new outreach program designed to identify unsheltered homeless persons in New Braunfels and engage them in services, shelter and/or housing. CDBG funds will be used for securing ID documents, transportation, medical costs, and clothing for program participants in PY23.
10	<b>Project Name</b>	Crisis Center of Comal County - Public Services
	<b>Target Area</b>	City Wide
	<b>Goals Supported</b>	PUBLIC SERVICES (SLE) 2.6
	<b>Needs Addressed</b>	PUBLIC SERVICES
	<b>Funding</b>	CDBG: \$10,000.00
	<b>Description</b>	Non-profit agency providing services to women, children, and men of all ages. These services include 24-crisis line, shelter, counseling, support groups, legal advocacy, assistance with filing for child support, case-management, victims advocacy, transportation, information/referral, and community education/prevention.
	<b>Target Date</b>	9/30/2024
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	It is estimated that 500 individuals and children will receive shelter and/or services during PY23.
	<b>Location Description</b>	Office: 1528 East Common Street, New Braunfels, TX 78130

	<b>Planned Activities</b>	Crisis Center of Comal County will provide services to women, children, and men including a 24-crisis line, shelter, counseling, support groups, legal advocacy, assistance with filing for child support, case-management, victim's advocacy, transportation, information/referral, and community education/prevention. CDBG funds will be used for salary support for a shelter case manager, client transportation, medication, food, hygiene supplies, clothing, and school supplies for the children.
<b>11</b>	<b>Project Name</b>	Big Brother Big Sisters of South Texas - Public Services
	<b>Target Area</b>	City Wide
	<b>Goals Supported</b>	PUBLIC SERVICES (SLE) 2.13
	<b>Needs Addressed</b>	PUBLIC SERVICES
	<b>Funding</b>	CDBG: \$10,000.00
	<b>Description</b>	Non-profit agency providing "at-risk" children and youth with a one-on-one mentor including the evaluation, training, placement, and supervision of volunteer mentors.
	<b>Target Date</b>	9/30/2024
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	It is estimated that 85 children and youth will be matched with a mentor and will participate in the program during PY23.
	<b>Location Description</b>	Main Office: 10843 Gulfdale, San Antonio, TX 78216 New Braunfels Office: 801 West San Antonio, New Braunfels, TX 78130
	<b>Planned Activities</b>	Big Brother Big Sisters of South Texas will provide evaluation, training, support, and placement for volunteer mentors for "at-risk" children facing adversity with strong and enduring, professionally supported one-to-one mentoring relationships during PY23. CDBG funds will be used for salary support.
<b>12</b>	<b>Project Name</b>	Administration
	<b>Target Area</b>	City Wide
	<b>Goals Supported</b>	ADMINISTRATION (AD) 5.1
	<b>Needs Addressed</b>	ADMINISTRATION
	<b>Funding</b>	CDBG: \$91,776.00

	<b>Description</b>	Oversight and management of CDBG program, subrecipients, and conducting fair housing activities.
	<b>Target Date</b>	9/30/2024
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	It is estimated that 2 individuals will benefit from CDBG funded activities.
	<b>Location Description</b>	City Hall - 550 Landa Street, New Braunfels, TX 78130
	<b>Planned Activities</b>	Oversight and management of CDBG program, subrecipients, and conducting fair housing activities. CDBG funds will be used for public notices, consultants, supplies, and trainings.
13	<b>Project Name</b>	Comal County Habitat for Humanity - Weatherization & Aging in Place Program
	<b>Target Area</b>	City Wide
	<b>Goals Supported</b>	HOUSING NEEDS (HN) 1.2
	<b>Needs Addressed</b>	HOUSING NEEDS
	<b>Funding</b>	CDBG: \$21,710.00
	<b>Description</b>	Non-profit agency providing an array of housing solutions, which includes repairs to existing owner-occupied residences and the construction of new housing for low-moderate income homebuyers.
	<b>Target Date</b>	9/30/2024
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	It is estimated that two low-moderate homeowners with properties within the city limits will receive improvements to their homes.
	<b>Location Description</b>	Office: 1269 Industrial Street, New Braunfels, TX 78130 Eligible homeowners and project sites will be selected during PY23.
	<b>Planned Activities</b>	Comal County Habitat for Humanity will conduct an intake process to determine eligibility for the program, develop a Scope of Work for eligible CDBG repairs and oversee the project. CDBG funds will be used for program delivery costs and supplies needed for repairs.
14	<b>Project Name</b>	City of New Braunfels - Minor Home Repair Program
	<b>Target Area</b>	City Wide
	<b>Goals Supported</b>	HOUSING NEEDS (HN) 1.3

<b>Needs Addressed</b>	HOUSING NEEDS
<b>Funding</b>	CDBG: \$109,900.00
<b>Description</b>	New Braunfels is an entitlement jurisdiction for Community Development Block Grant funding from the Department of Housing & Urban Development. The City utilizes CDBG funds to assist low-moderate income residents of New Braunfels with housing and services.
<b>Target Date</b>	9/30/2024
<b>Estimate the number and type of families that will benefit from the proposed activities</b>	It is estimated that ten (10) eligible homeowners will receive needed repairs to their homes.
<b>Location Description</b>	Office: City Hall - 550 Landa Street, New Braunfels, TX 78130
<b>Planned Activities</b>	The City of New Braunfels will manage a minor home repair program for income eligible homeowners residing with the city limits including, but not limited to, weatherization, ADA improvements including ramps and bathroom remodels, aging in place repairs and other eligible minor home repairs. CDBG funds will be used for program delivery costs and supplies needed for the home repairs.

## **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 PY23 funds geographically to specific targeted areas. Funding is allocated for projects on 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 8 - Geographic Distribution**

#### **Rationale for the priorities for allocating investments geographically**

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

#### **Discussion**

Public services and housing programs operated by subrecipients and/or the City are conducted on a city-wide basis with income being the main qualification for services and housing funded with CDBG. The 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.

## Affordable Housing

### AP-55 Affordable Housing – 91.220(g)

#### Introduction

Affordable housing is generally accepted to mean that no more than 30% of a household's gross annual income is spent on housing, including utilities. Affordable housing remains a challenge for the residents of New Braunfels. The City recently updated their Analysis to Impediments to Fair Housing Choice and found that 45.3% of renters are paying more than 30% of their household income toward rent alone. When adding in the utility costs, the percentage of renters paying more than 30% rises to 55%. Fourteen percent (14.3%) of homeowners with a mortgage are paying more than 30% on their housing costs with 15% of all owners, with or without a mortgage, paying more than 50% of income on housing costs.

Efforts have been made to retain affordable housing stock by continually funding non-profit agencies that provide minor home repairs addressing the issues of deferred maintenance, weatherization, and accessibility improvements for low-moderate income homeowners. Increasing the supply of transitional and 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.

Providing a blueprint for developing and providing more affordable housing, Workforce Housing Study is the study 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 Workforce Housing Advisory Committee is a 15 member City Council appointed group that includes representatives from the Community Development Advisory Committee, Four Rivers Association of Realtors, GNB Home Builders Association, local bank or mortgage lending industry, McKenna Foundation, GNB Chamber of Commerce, NBEDC, NB Housing Authority, New Braunfels Utilities, Planning Commission, NB Housing Partners, and Habitat for Humanity; plus 3 at-large members to raise awareness about the challenges of affordable and available workforce housing and to advise the City Council on providing solutions for a full range of workforce housing choices for households of all incomes, ages, and abilities.

During PY22, the City updated their Section 3 plan to meet the new federal regulations, and requirements. Currently, there are not any Section 3 contractors located within the City. If a project

would be eligible for Section 3, the City would expand the search for Section 3 contractors. The PY23 projects do not require Section 3 or meet the BABA criteria.

<b>One Year Goals for the Number of Households to be Supported</b>	
Homeless	650
Non-Homeless	20
Special-Needs	0
Total	670

**Table 9 - One Year Goals for Affordable Housing by Support Requirement**

<b>One Year Goals for the Number of Households Supported Through</b>	
Rental Assistance	20
The Production of New Units	0
Rehab of Existing Units	12
Acquisition of Existing Units	0
Total	32

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

## Discussion

The City uses the following actions in order to meet the Affordable Housing definitions at 92.252 and 92.254:

### Homeownership and Minor Home Repair

Utilizing CDBG funding, homeownership and minor home repair assistance is provided by subrecipient agencies to low-moderate income homeowners and homebuyers; agencies are required to use the most recent HUD Income Guidelines when providing assistance. The agencies are also required to use the HUD Income Eligibility Calculator and provide third party documentation of household income to the City. Subrecipient contracts between the City and the agency contain the requirement that all CDBG assistance must benefit low-moderate income households; City ensures compliance by having the agencies submit the income documentation prior to project approval and performs desk review and/or on-site monitoring of the subrecipient agency.

### Rental Housing

Utilizing CDBG funding, emergency rental and utility assistance is provided by subrecipient agencies who are required to use the most recent HUD Income Guidelines when providing assistance. Subrecipient contracts between the City and the agency contain the requirement that all CDBG assistance must benefit low-moderate income households which is verified by the agency's collection of income information and documentation. City ensures compliance by desk review and/or on-site monitoring of

the subrecipient agency.

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 meeting and comments from residents. Affordable housing (rental and homeownership), affordable childcare and public transportation are critical needs. To improve the quality of life of all citizens in New Braunfels, the City will continue to work with housing providers to address the need for additional affordable housing.

The City continues to support emergency rent and utility assistance programs with CDBG funds.

New Braunfels has received American Rescue Plan Act (ARPA) funds and, after a competitive application process, awarded over \$7.1 million dollars in grants to 8 local non-profit agencies for capital improvement projects for their public facilities. Projects will be completed by September 30, 2026, and will provide assistance to low-moderate income City residents such as a youth care center, affordable housing, and emergency shelter and transitional housing to those experiencing homelessness, victims of domestic violence and sexual assault, and at-risk youth.

While 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, the high costs of lots, and the lack of capacity of the local providers to undertake construction and management of affordable housing properties remains an obstacle. 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-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 Housing Authority does not have information on the extent of generational poverty in local public housing.

### **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 propose any direct activities with the New Braunfels Housing Authority using CDBG funds for PY23 but will continue to collaborate with the Housing Authority 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 by providing the residents the opportunity to learn about the activities, security, modernization projects and management issues and provide input and feedback. Two public housing residents, one of whom is the acting Chair, are voting members on the Board of Directors and provide information to the Board on current needs and issues and help direct the efforts of the staff to the most immediate issues. City staff will continue to meet with the Executive Director to discuss upcoming changes and plans for public housing residents and properties.

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.

### **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 continue to work to identify ways to partner together to provide safe, affordable housing and homeownership opportunities such as funding

for a new generator at the Laurel Plaza public housing facility using CDBG funds.

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

### **Introduction**

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, emergency shelter providers, public housing staff, emergency service providers 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.

A Point-in-time count was conducted in January 2023 and provided the following information: There were 93 individuals identified as homeless which is a 113% increase over the 2020 count. Of the 93 identified 5% were veterans, 25% reported a serious mental illness, 9% reported a substance use disorder, and 9% were survivors of domestic violence. Additional information is 59% were experiencing homelessness for the first time, 22% are considered chronically homeless and 17% were young adults (ages 18-24) which is an increase of 750% over the number of young adults surveyed in 2020.

The New Braunfels and Comal ISDs reported 82 homeless youth with 75% of the youth reporting a history of family violence and 46% reporting a history of child abuse. It should be noted that the definition of homelessness for the U.S. Department of Housing and Urban Development and the U.S. Department of Education are different.

### **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**

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, and in PY23, CDBG funds will be used by an agency for their outreach program to unsheltered individuals and families. Information regarding services and housing is distributed by local agencies, local churches that operate food pantries, at non-profit agencies and governmental entities. The City will continue to work with agencies that 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 conducted every January.

- Funding for the continuation and further development of homeless shelters and transitional housing sites.
- Continued discussions on shelter, transitional housing, and permanent supportive housing

needs with local agencies

- Continued funding for emergency rent and utility assistance programs with PY23 CDBG funds
- Continued participation in the Comal County Homeless Coalition.
- Continue discussions with public institutions so people are not discharged into homelessness.

First Footings, an emergency shelter for adults operated by NB Housing Partners, opened in January 2021 in New Braunfels. This is the first emergency shelter located in New Braunfels for adults experiencing homelessness and with PY23 funds, NB Housing Partners will operate an outreach program to identify and engage unsheltered homeless individuals and families to participate in housing and service programs.

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

A homeless shelter was a high priority identified in the 2020-2024 Consolidated Plan. First Footings, the City's first homeless shelter for adults, was opened by NB Housing Partners in January 2021 at a temporary location in New Braunfels. Utilizing City-awarded ARPA funding, a permanent site is in development and will open during PY23. The Salvation Army currently operates a transitional housing program for adult males and families with children who have experienced homelessness with the average length of stay between 12 and 24 months. The Crisis Center of Comal County operates an emergency shelter for victims of domestic violence and/or sexual assault and a transitional housing project is in the planning stages. Connections has an emergency shelter for children and youth, and a transitional housing program for youth between the ages of 15 – 21. During PY23, the Crisis Center of Comal County and Connections will utilize City-awarded ARPA and CDBG funding for the construction of new emergency shelters and transitional housing.

Additionally, using City-awarded ARPA grant funds, the San Antonio Food Bank has a transitional multi-family housing project in development that will provide 51 units of affordable rental housing when completed.

**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 is aware of the lack of affordable housing choices within the City and are committed to working with agencies that are interested in constructing affordable housing or developing a Rapid Re-Housing or transitional housing programs. With limited affordable housing options, it is difficult to find stable housing for persons who are experiencing homelessness. Working with local partners, 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. During PY22, the City has awarded over \$5.3 million dollars in grant funding for emergency shelter, transitional housing, and affordable housing projects, and during PY23, the City awarded \$263,500 in CDBG funding for services and projects that support homelessness prevention and response.

The First Step program, operated in partnership by NB Housing Partners, Crisis Center of Comal County, and the Hill Country MHDD, received State grant funding to provide housing and supportive services with a focus on mental health. The agency also is actively coordinating vision, dental, and physical healthcare services. Additionally, the program is also working to collaborate with local hospital systems, healthcare providers, and emergency care services. This will ensure that individuals experiencing homelessness are linked to shelter and that, over time, the number of emergency care/emergency hospitalization services for homeless individuals is reduced.

The San Antonio Food Bank is developing The Family Housing Trust Program, a transitional housing program including a 51-unit apartment complex that is expected to open during PY23 and will be located next to the New Braunfels Food Bank. A Food Bank case manager and community partner sponsor will facilitate a custom program plan created by the participant for up to 36 months. The framework will center around wage development, budgeting, skills training, self-sufficiency, and social capital. Regular milestone check-ins and progression status reports will assist in the successful completion of each family's program. Successful program graduation each family with a Housing Trust will be awarded up to \$10,000 to go towards permanent housing in New Braunfels. The Trust coupled with increased wages and/or skills should allow families that were previously unable to afford to live in New Braunfels to thrive with assets and savings. The amount of Trust awarded will depend on the length and details of each family's program.

With a focus on addressing and preventing homelessness, the City and local service providers have identified the provision of direct assistance with emergency rent and utilities as well as supportive services to help those potentially at risk of becoming homeless as the key priorities and developing transitional housing sites.

**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.**

Families living below the poverty level and those on a fixed income are often unable to afford to housing, utility, food, and medical costs, which puts them at risk of becoming homeless. The City will continue to use CDBG funds to support programs that address housing and public service issues such as providing minor home repairs, food assistance, emergency rental and utility assistance, and case

management services.

As part of the Continuum of Care planning with the Comal County Homeless Coalition, the City continues to work with service and housing providers to develop mechanisms that prevent discharge from public institutions into homelessness. To ensure that individuals are not discharged into homelessness, area facilities and institutions have policies with the following 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 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 but the City has collaborated with local agencies to provide emergency shelter, transitional housing, and services to those experiencing homelessness.

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

### Introduction:

Consistent with the statutory obligation under the Fair Housing Act, the City certifies that it will affirmatively further fair housing. the City updated and revised the Analysis of Impediments to Fair Housing Choice during PY22 and will be revising and updating the Fair Housing Plan when the final rule for Affirmatively Furthering Fair Housing is released.

**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**

While the purpose of the Analysis of Impediments is to identify issues affecting the protected classes, one of the primary reasons affecting housing choice is the lack of affordable housing in the City which affects all residents as well as the protected classes.

The primary impediments to affordable housing choice identified during the process of updating the AI include the following:

- An inadequate supply of affordable housing (rental and for sale)
- The lack of public transportation to efficiently connect people with employment and other community assets
- Public opposition to new affordable housing developments, homeless shelters, and supportive housing projects
- An inadequate level of funding to address affordable housing within the City

**Impediment 1:** Low- to moderate-income residents throughout the community are lacking financial independence and skilled labor and blue-collar job opportunities. The job opportunities in the immediate area are primarily white-collar professional jobs.

**Impediment 2:** New Braunfels has a shortage of affordable rental housing and housing for sale.

**Impediment 3:** Possible predatory lending for homes in new subdivisions and denial of loans to minorities or moderate-income.

**Impediment 4:** New Braunfels has a shortage of affordable and safe rental units for disabled individuals.

**Impediment 5:** Possible discrimination against protected classes by property owners, realtors, lenders, and homeowner associations.

**Impediment 6:** Many low- to moderate-income and protected class homeowners are unable to repair their homes, making the homes inefficient and, often, dangerous as well as causing a decline in the neighborhood.

**Impediment 7:** Due to the age of some residential areas in New Braunfels, public infrastructure and facilities are either inadequate or deteriorating limiting access to residents, particularly LMI and protected class residents.

**Impediment 8:** Aging neighborhoods in New Braunfels have numerous code violations and abandoned properties that are hindering the health and safety of the residents and preventing the areas from becoming desirable for desegregation and redevelopment.

**Impediment 9:** Fair Housing rights are not generally known throughout New Braunfels and Fair Housing advocates in the region are generally unaware of fair housing violations in the City.

Further information on impediments and action steps is included in the attachment - AI Impediments and Action Steps.

#### **Discussion:**

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 rising at the same pace.

The updated AI did not identify any barriers resulting from the public policies. The City continues to 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. During the past five years, the City has not had any reports of housing discrimination based on the protected classes.

## **AP-85 Other Actions – 91.220(k)**

### **Introduction:**

The City partners with public and private organizations to enhance the effectiveness of programs delivering housing, facility improvements, 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 the identified 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. City activities include facilitating an annual stakeholder meeting, meetings with local focus groups, and participating in the Comal County Homeless Coalition to identify unmet needs and to strategize on how to meet those needs.

New Braunfels received American Rescue Plan Act (ARPA) funds in 2021 and due to the flexibility of the funding, the City will be able to utilize the funds for a much larger positive impact on the needs of the low- to moderate-income residents. For example, after a competitive application process, awarded \$7.1 million dollars in grants to 8 local non-profit agencies for capital improvement projects for their public facilities. Projects will be completed by September 30, 2026, and will provide assistance to low-moderate income City residents such as a youth care center, affordable housing, and emergency shelter and transitional housing to those experiencing homelessness, victims of domestic violence and sexual assault, and at-risk youth.

Facilitating broadband deployment throughout New Braunfels has been identified as a strategic priority. The New Braunfels Economic Development Corporation and New Braunfels Utilities (NBU) have explored various methods to bring greater broadband availability. In 2021, the New Braunfels City Council approved a project to help subsidize the expansion and delivery of high-speed broadband infrastructure and services at an affordable rate to underserved and commercial areas of New Braunfels. There are several companies that provide internet service in New Braunfels, such as CenturyLink, ViaSat, and Spectrum. According to information from data.census.gov (“Measuring America’s People, Places, and Economy”), 95.2% of New Braunfels residents have a broadband internet subscription. City Management and the City’s Economic and Community Development department continues to evaluate broadband needs of its residents for consideration of future projects.

Regarding resiliency, the City’s Emergency Management Division of the New Braunfels Fire Department is the group responsible for public safety during natural disasters such as flooding, winter storms, and other natural disasters. The group has developed coordinated responses and agreements with private and volunteer agencies, keeps updated lists of resources, and assigns roles for various groups to assist the City during emergency events. In addition, the group provides warning materials and

announcements; briefs the radio, television, and newspaper entities on emergency matters; and present information to civic organizations, schools, churches, and community centers. The City's Emergency Management Coordinator (EMC) also develops hazardous material inventory (Tier II) as well as coordinates and interfaces with operational response plans with other governmental agencies, volunteer groups, industry, and health organizations.

### **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. In addition to funding a non-profit's minor home repair program, the City has developed an in-house minor home repair program in PY22 to assist low-moderate income homeowners with needed minor repairs, accessibility improvements, and weatherization in an effort to maintain decent housing and further deterioration of the home and neighborhood.

The City will support Low Income Housing Tax Credit applications and other affordable housing projects when the project is viable and compatible with the Comprehensive Plan.

The Workforce Housing Advisory Committee is working to provide a framework to encourage the development of affordable housing in the city. To support the initiative, the New Braunfels' City Council and Workforce Housing Committee held a joint workshop in July 2022 to discuss a proposed 3-year action plan during which the Committee recommended a series of actions to the City Council to pursue to establish an institutional and funding framework and mechanisms to address the affordable housing shortage in New Braunfels. Components of the plan include, but are not limited to, establishing and capitalizing a Housing Trust Fund, and Housing Finance Corporation, supporting and growing non-profit housing providers, and expanding homebuyer assistance and down payment assistance programs.

During PY23, CDBG funds will also be used to provide emergency rent and utility assistance to prevent homelessness, support transitional housing programs and the domestic violence shelter and the emergency homeless shelter.

### **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 through a non-profit agency and operates an in-house CDBG funded minor home repair program. Lead-based paint information is included in the application package and agency staff discusses lead-based paint issues with the applicants.

The 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 the 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 the 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 is a rapidly growing city that relies heavily on the service industry and lower paying occupations. Although there is a very low unemployment rate of about 3.7%, most of these jobs pay minimum wage, which cannot support a family's basic budgetary needs

New Braunfels addresses the problem of poverty through its strategic goals. In 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.

The New Braunfels Food Bank's new Family Housing Trust Program will allow families to afford local rent, set aside savings, and work with a case manager on wage and skills development. The result will be to obtain a living wage during the program, and upon graduation be awarded a Housing Trust to ensure post-program self-sufficiency in New Braunfels.

### **Actions planned to develop institutional structure**

The City will continue to make CDBG and ARPA funds available to the community through issuance of subrecipient agreements; all available CDBG-CV funding has been awarded to subrecipients. 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 City-awarded grant 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 stakeholder to discuss community development issues. The Community Development Advisory Committee meets monthly; meetings times and agendas are posted, and the meetings are open to the public.

The City recognizes the need to provide continued 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 locations such as the Westside Community Center, civic groups, and churches, or facilities located in low-moderate income areas.

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

The City works with housing and service providers by regular communication through focus group, stakeholder meeting and technical assistance. The City conducts a competitive process for the award of CDBG funds. Information on the application phase of the CDBG program year is made available through the City's website, in public notices in the local paper and through emails to local agencies. The City provides a pre-application workshop to inform agencies of the eligible activities and provides information on HUD reporting requirements. Group or individual meetings occur prior to the execution of Subrecipient Agreements to review the contracts and provide additional information and forms for reporting requirements. Technical assistance is available 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 stakeholder to discuss community development issues. This approach provides a structure for the City to coordinate and collaborate with the agencies.

**Discussion:**

The needs in New Braunfels have far outweighed the resources and COVID-19 resulted in an explosion of increased need. CDBG-CV and ARPA funding has allowed the City to address the needs of those impacted by COVID-19 and to coordinate with additional service providers. The City through the New Braunfels EDC has provided grant funding to small businesses as a means of helping business to remain viable and to continue employment for low-moderate income residents

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 and any additional federal funding in assisting the low to moderate-income residents of New Braunfels.

## Program Specific Requirements

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

#### Introduction:

The City of New Braunfels has not conducted any activities that generate program income. The City does not have a Section 108 loan, surplus funds generated from an urban renewal settlement, no funds have been returned to the line of credit, and no float funded activities.

#### Community Development Block Grant Program (CDBG) Reference 24 CFR 91.220(l)(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
<b>Total Program Income:</b>	<b>0</b>

#### 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.	98.00%

The City of New Braunfels has not conducted any activities that would produce Program Income; does not have a Section 108 loan or surplus funds from urban renewal settlements, float-funded activities and has not returned grant funds to the line of credit.

## Attachments

## Citizen Participation Comments

### COMMUNITY DEVELOPMENT BLOCK GRANT (CDBG)

#### CITY OF NEW BRAUNFELS - STAKEHOLDERS FOCUS GROUP – PROGRAM YEAR 2023 (PY23)

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##### PRIORITIES FOR CDBG PROGRAM YEARS 2020-2024 CONSOLIDATED PLAN

- Housing
- Homelessness
- Public Facilities
- Public Services
- Administration

##### GOALS FOR STAKEHOLDER FOCUS GROUP DISCUSSION

- Identify greatest housing and community development needs of your clients and low-moderate income residents.
- Identify opportunities and barriers to affordable housing; and
- Collect information that is needed for the development of the CDBG PY23 Annual Action Plan to be submitted by the City to the U.S. Department of Housing & Urban Development (HUD).

##### HOUSING NEEDS

1. What are the greatest housing needs and barriers for low-moderate income renters and homeowners in New Braunfels?

##### STAKEHOLDER FEEDBACK

- Lack of inventory of affordable housing in the community
- Lack of inventory of affordable, undeveloped property inside of city limits
- Lack of inventory of affordable rental housing in the community as average rent costs are \$1,500-\$1,900 per month but as an example, rental rates of \$900 per month are needed for someone who earns \$15 per hour.
- Lack of a local down payment assistance program for low- to moderate-income homeowners; average cost for down payment to purchase a home is approximately \$4,000.
- There is a Tenant-Based Rental Assistance (TBRA) program cap of \$1,100 for assistance, and TBRA will not provide funds if there is more than one family in the residence which is classified as cooperative housing and is therefore ineligible.
- Extensive length of time to obtain a housing choice voucher offered by HUD via Public Housing Agencies e.g., the New Braunfels Housing Authority.
- Stakeholders have received feedback from clients experiencing issues such as denial of housing caused by evictions on someone's record, and the number of children in their household.
- Stakeholders have received feedback that the City's tax rate increases the cost for rental properties and therefore the cost to renters because it's passed through to the renters by landlords.

2. What are the most common housing problems for low-moderate income residents?

**STAKEHOLDER FEEDBACK:**

- Stakeholders provided an example that some landlords have raised by \$300 and referred to the current market as a "landlord's paradise".
- Rental housing stock is often in poor condition for low- to moderate-income renters and landlords are not performing sufficient maintenance or repairs so renters request assistance from local agencies such as the Comal County Habitat for Humanity.
- Lack of supervised independent living for those that age out of transitional housing for at-risk youth.
- Stakeholders provided commentary that there is a "blind ignorance of housing needs", a "need to educate the public," and there is an "idea that it's families who aren't working or lazy or a different culture."
- Stakeholders provided feedback that cooperative housing would "be a good option but is not allowed at this time."
- Stakeholders provided feedback that there is competition with tourists for low- to moderate-income renters because landlords receive more money from tourists.
- Lack of garden homes in the city for residents; majority of affordable rental stock are apartments such as the Eden Heights, Laurel Heights, and Balcones Haus complexes.

**3. What groups of people have the greatest housing needs in New Braunfels?****STAKEHOLDER FEEDBACK:**

- a. Minimum wage earners
- b. Senior citizens
- c. Individuals because priority for assistance seems to be given to small families.
- d. Residents with an eviction or conviction on record
- e. Residents with mental health challenges as they may have a sporadic work history.
- f. Residents who have applied for disability and are therefore not allowed to work while the request is being processed which can take up to a year until approved.
- g. Residents who have been evicted from Section 8 housing are unable to reapply for 10 years.

**FAIR HOUSING**

**NOTE:** "Fair Housing" discrimination is the denial of housing based upon the race/ethnicity, gender, age, religion, disability, national origin, sexual orientation, or family structure of the prospective tenants or buyers. These are known as "protected classes"; housing cost and insufficient tenant/buyer income or credit are not fair housing issues.

**1. Have any clients reported that they have been denied housing based on any of the protected classes?****STAKEHOLDER FEEDBACK:**

- h. No reports to City's Fair Housing Officer or Stakeholders of denial of housing to residents based on any of the protected classes as of April 13, 2023.

**SERVICES NEEDED****1. Are there areas in the City that are lacking certain community services and/or amenities?**

**STAKEHOLDER FEEDBACK:**

- i. Stakeholders provided commentary that areas within the City that lack certain community services and/or amenities for the following residents living in:
  - o the "Westside" area (located within District 1)
  - o the "Solms area" (located within District 1)
  - o the Linde Apartments complex (located within District 6)
  - o abandoned houses in the Morningside Drive / Rueckle Road area (located within District 1)
  - o the significant amount of new housing on Farm-to-Market Road 306 (located within District 4)
- j. The City is lacking sufficient ADA-compliant pedestrian infrastructure and accessibility to buildings and facilities.

2. What are the primary supportive service needs of low-moderate income residents of New Braunfels?

**STAKEHOLDER FEEDBACK:**

- k. Lack of affordable childcare; issue is compounded by low inventory of businesses that will accept Child Care Assistance vouchers provided by the Texas Workforce Commission (TWC).
- l. Need additional utility assistance as many residents have reached the cap of \$900 in assistance within a 12-month period for the current City-funded utility assistance program. Local non-profit organizations work to locate additional utility assistance programs for residents as needed.
- m. Increased number of requests for rental assistance after the eviction moratorium expired.
- n. Food insecurity has increased in the city as federal sources for food assistance have decreased.
- o. The community is growing faster than can keep up with psychiatric needs, so it is crucial to coordinate care. For example, one local non-profit organization provides medication in coordination with another local non-profit organization that provides counseling sessions. The organization providing counseling sessions moved to a new building in PY20 that is 2.5 times larger than their previous location and immediately had a 66% increase in clients, and then an additional 30% increase during their first year of operation at the new facility.
- p. In summary, Stakeholders provided commentary that there is a continued need for community-based care e.g., emergency shelter, transitional housing, food, utility assistance, transportation, and psychiatric care including medication.

3. Describe programs—or the need for programs—for ensuring that persons returning from mental and physical health institutions and/ or persons who are homeless receive appropriate supportive housing.

**STAKEHOLDER FEEDBACK:**

- q. Local non-profit organization works with hospitals to provide psychiatric medication after patients are released after experiencing mental episodes.
- r. Insufficient in-patient options for substance abuse recovery has been very challenging, especially after the significant increase in substance abuse caused by the COVID-19 pandemic. Currently, there are two facilities that have begun to provide this service at discounted rates; one is located 27 miles and the other is located 69 miles from New Braunfels.

- s. Increased delays in releasing seniors from physical rehabilitation facilities because their homes require accessibility projects prior to release such as the installation of ramps or improved electrical systems that will support the use of a hospital bed in their home.
- t. Insufficient options for residents experiencing homelessness as the city is not a recipient of HUD's HOME funding. A permanent site for an emergency shelter is currently in development and expected to open in the Fall of 2023 but will not have sufficient capacity for all homeless residents.

#### **NON-HOUSING COMMUNITY DEVELOPMENT**

- 1. What are the greatest community and economic development needs? For example, neighborhood revitalization, job creation, local business development, transportation?

##### **STAKEHOLDER FEEDBACK:**

- u. Lack of reliable public transportation
- v. Need higher paying, steady-income jobs as there are many jobs available in the city but the majority are positions that are low paying and/or part time due to the economic decline in local businesses caused by the COVID-19 pandemic.
- w. Insufficient employment options for residents with mental challenges although there are some local temporary employment agencies that are working to assist these residents.
- x. Job creation and retention is challenging for local non-profit organizations as employers because it is difficult to pay living wages.
- y. There are construction challenges because laborers are becoming more rare, particularly due to insufficient number of trade schools, and the cost of building materials has increased by 40% since 2020.

If you would like to share additional information that you believe would inform the development of the PY23 Annual Action Plan or the Fair Housing Plan, please contact Jennifer Gates at [JGates@newbraunfels.gov](mailto:JGates@newbraunfels.gov) or (830) 221-4383, or Paula Harper at [paula.cstx@gmail.com](mailto:paula.cstx@gmail.com) or (979) 324-7402.

##### **STAKEHOLDER FEEDBACK:**

- z. Stakeholders provided commentary that conditions will not change without educating the community about the challenges of low- to moderate-income residents, particularly as there is a stigma against those who earn the minimum wage rate.

#### **ADDITIONAL COMMENTS FROM THE SAN ANTONIO FOOD BANK – NEW BRAUNFELS FACILITY**

- Thank you both for the continued support and hard work that agencies provide to NB Agencies
- With respect to this opportunity for feedback/input - for the SA/NB Food Bank, we are still looking at meeting the needs of so many households that struggle when it comes to food insecurity. Providing

nourishment and emergency food for families and individuals in the City of NB, is certainly a need we focus on.

- I will note - affordable housing for families continues to be an issue that we are aware of and we are still moving forward with the AppleSeed Project for the NB Community. We feel that this Project is vital for families that can't afford high rents and overall housing costs.
- Both issues re food insecurity and housing, we feel - should be included in this and future Annual Action Plans for HUD/CDBG/Consolidated - moving forward. Additionally, funding is always a challenge that we see and try to deal with...as do so many non-profit organizations these days.

#### **COMAL COUNTY HOMELESS COALITION**

- The homeless shelter has secured a permanent and larger space but still needs to expand transitional housing and permanent affordable housing
- 85% of shelter clients are from Comal County, and recently those most in-need have been disabled and elderly. The shelter is seeing a lot of people on the brink of homelessness show up for assistance.
- Family Life Center has seen an increase in the number of people needing emergency and rent assistance and there needs to be more funding for homeless prevention
- There are still a lot of requests from the homeless or elderly on the verge of homelessness- either displaced by family or rent costs.
- There is still a need for funding for hotel voucher programs for families experiencing homelessness since there is not a shelter for families unless they have experienced domestic violence.
- Hill Country and their crisis team say some progress has been made for a jail diversion program but there is still more that needs to be figured out.
- The local food banks continue to see an increase in the number of households that need emergency food and household items.
- Funding is needed for gas cards and other transportation costs such as UBER and bus tickets.
- need for affordable childcare and childcare centers with extended hours for parents working late shifts.

#### **New Braunfels Resident – Comments on PY23 Action Plan**

##### **Plan Section Text: Page 1, Introduction**

Pursuant to the City's 5-year Consolidated Plan, the City has focused efforts on improving the quality of life for extremely low-, very low-, and low-income households – those households with incomes at or below 80% of the area median income.

Comment: Suggest the plan identify by Council District the percentage of households that meet this definition. As an alternative identify this data by census tract units in a City Council District.

##### **Plan Section Text: Page 25**

The City of New Braunfels Citizen Participation Plan encourages participation of all residents, especially the low and moderate-income population. Formal and informal approaches are used each year in the assessment process to provide adequate opportunities for citizens to participate in the development of the Consolidated

Plan and the Annual Action Plans. These actions include placing public notices in the New Braunfels Herald-Zeitung, the City's local newspaper, meetings with stakeholders, one-on-one interviews, information provided on social media and appointment of citizens to the Community Development Advisory Committee (CDAC) by City Council, and public hearings at city council meetings and other locations. All meetings are held in accessible locations with interpreters available upon request

Comment: Suggest Council Members with pockets of poverty as defined by income level reach out to the community leaders to increase participation in CBDG planning process e.g., public meetings scheduled at times working class citizens can attend in their district and provide input and better understand how these programs benefit their district or census tract.

Plan Section Text: p 32

PUBLIC SERVICES (SLE) 2.7 Goal Description FAMILY LIFE CENTER - Homeless prevention activities Including emergency rent and utility assistance to low-moderate income New Braunfels households.

Comment: It would be helpful if the plan or subsequent report provided the actual data on emergency assistance for rent and utility assistance in terms of households served and dollar amount for each category . Again, it would be helpful if this was at the Council District level.

Plan Text: page 47

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 directly allocating PY23 funds geographically to specific targeted areas. Funding is allocated for projects on 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 8 - Geographic Distribution Rationale for the priorities for allocating investments geographically The City of New Braunfels is not allocating funds geographically to specific targeted areas Discussion Public services and housing programs operated by subrecipients and/or the City are conducted on a citywide basis with income being the main qualification for services and housing funded with CDBG. The 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

Comment:

It would be helpful if the plan identified areas of poverty in the City to establish if there is change overtime or if some projects should be approved or target certain areas so that residents can measure neighborhood progress.

Plan Section text: Page 48

AP-55 Affordable Housing – 91.220(g) Introduction Affordable housing is generally accepted to mean that no more than 30% of a household's gross annual income is spent on housing, including utilities. Affordable housing remains a challenge for the residents of New Braunfels. The City recently updated their Analysis to Impediments to Fair Housing Choice and found that 45.3% of renters are paying more than 30% of their household income

toward rent alone. When adding in the utility costs, the percentage of renters paying more than 30% rises to 55%. Fourteen percent (14.3%) of homeowners with a mortgage are paying more than 30% on their housing costs with 15% of all owners, with or without a mortgage, paying more than 50% of income on housing costs

Comment:

The plan states the City recently updated their Analysis to Impediments to Fair Housing Choice and found that 45.3% of renters are paying more than 30% of their household income toward rent alone. When adding in the utility costs, the percentage of renters paying more than 30% rises to 55%. Fourteen percent (14.3%) of homeowners with a mortgage are paying more than 30% on their housing costs with 15% of all owners, with or without a mortgage, paying more than 50% of income on housing costs.

It would be very useful if this data were broken down by the City Council District or by Census Tract Units. This appears to be useful data that could inform the public, Council Members, and the Mayor of the scope of this problem and help them increase funds to public utility assistance. More than one Council member said when funding the ARPA Utility Assistance Program, they had no idea on the need in New Braunfels. This updated data would be beneficial to the Community

#### New Braunfels Residents – Comments from the on-line survey

1. As a displaced homeowner and citizen of Braunfels, I was surprised to see how hard it is to receive assistance in shelter, food & work. I was only able to locate one organization that would provide assistance with shelter after registering with them and being put on a waitlist. It has been roughly 2 weeks of waiting and every time I contact them, I am told I am still on the waitlist. As of today, I do not know of any vouchers available for temporary shelter or gas to continue to work. I have contacted a few shelters in Braunfels but they did not have any information on any vouchers being granted.
2. New Braunfels does not provide adequate support (political support) to public housing.
3. I have contacted the crisis hotline of New Braunfels to get information on assistance for temporary housing or shelter. I am currently on a waitlist but I could not get any information on emergency assistance. I was told I could park in a Walmart parking lot or under a bridge until I went up on the waitlist. I have looked online on the City of New Braunfels website and all the funding from government grants to be allocated to different departments & it's surprising to see that with all of the funds going into public housing that I could not find one organization that could provide assistance. It has been 2 weeks now having no shelter, this Texas heat, harassment from other citizens & the NBPD & no emergency available assistance to continue working. I feel like New Braunfels as a whole is forcing low income or the homeless to relocate out of the city where it could put them in a more toxic location instead of helping improve a citizens situation and well-being.

# ANNUAL ACTION PLAN SURVEY: COMMUNITY DEVELOPMENT BLOCK GRANT

The City of New Braunfels receives funding from the U. S. Department of Housing and Urban Development (HUD) for its Community Development Block Grant (CDBG) program. This program serves the low- to moderate-income residents and neighborhoods. In order to receive these funds, the City must develop a Consolidated Plan every 5 years and an Annual Action Plan that documents priorities and goals for the program.

This questionnaire is aimed at providing the City with information on the needs, priorities, and visions of residents and stakeholders in New Braunfels. The results of the survey will form the priorities and goals for developing the Annual Action Plan and implementing the CDBG program.

Your participation in this process is greatly appreciated!

1. In what neighborhood, area, apartment complex or housing development in the City do you live and/or represent? [Respondent types answer to question into a textbox.]

2. What is your age? [Respondent selects one response from multiple choices.]

Under 25

25-44

45-64

65-74

75 or older

3. Race (*Optional Information*) [Respondent selects one response from multiple choices.]

African American

American Indian/Alaskan Native

Asian

Hawaiian/Pacific Islander

Multi-Racial

White

4. Ethnicity (*Optional Information*) [Respondent selects one response from multiple choices.]

Hispanic

Non-Hispanic

5. Please rate the following owner-occupied housing needs in New Braunfels. [Respondent selects one response per column for each Activity listed.]

ACTIVITY	Low Need	Moderate Need	High Need	Don't Know
Minor Home Repair (\$0 - \$10,000)				
Substantial Rehabilitation (\$10,000+)				
Energy Efficient Improvements/Weatherization				

Accessibility (ADA) Assistance for Elderly and Disabled Homeowners				
Down Payment and Closing Cost Assistance for Low Income Homebuyers				
Other (Please Specify)				

6. Please rate the following rental housing needs in New Braunfels. [Respondent selects one response per column for each Activity listed.]

ACTIVITY	Low Need	Moderate Need	High Need	Don't Know
Construction of New Affordable Rental Units for Low-Mod Income				
Transitional Housing for Homeless Individuals and Families				
Permanent Supportive Housing for Homeless				
Additional Section 8 Vouchers for Rental Assistance				
Additional Public Housing Units				
Other (Please Specify)				

7. Please rate the following non-housing community needs in New Braunfels. [Respondent selects one response per column for each Activity listed.]

ACTIVITY	Low Need	Moderate Need	High Need	Don't Know
Transportation Services/Public Transportation				
Services/Shelter for Victims of Domestic Violence and Sexual Assault				
Emergency Shelters for the Homeless				
Services for Abused and Neglected Children				
Services for Seniors including Meals on Wheels, day programs, transportation, etc.				
Mental Health Services				
Substance Abuse Services and Treatment Programs				
Emergency Assistance such as rent and utility assistance, prescription assistance				
Food Bank or Food Pantries				
Health Services and Low Cost or Free Clinics				
Other (Please Specify)				

THANK YOU FOR YOUR PARTICIPATION!

## ESTUDIO DE PLAN DE ACCIÓN ANUAL: COMUNIDAD DESARROLLO BLOCK GRANT

El ciudad de New Braunfels recibe fondos de el u. S. Departamento de vivienda y desarrollo urbano (HUD) para su comunidad desarrollo bloque Grant (CDBG) programa. Esto programa sirve la baja - a moderados residentes y barrios. En orden para recibir estas fondos, la ciudad debe desarrollar un consolidada Plan cada 5 años y un Plan de acción anual que documentos prioridades y metas para la programa.

Este cuestionario es para en proporcionar el ciudad con información en la necesita, prioridades, y visiones de residentes y interesados en New Braunfels. El resultados de el encuesta le forma la prioridades y objetivos para desarrollar el Plan de acción anual y aplicación el CDBG programa.

¡Su participación de esto proceso de es mucho apreciado!

1. En lo barrio, zona, Apartamento complejo o viviendas desarrollo en la ciudad hacer te vivir y /o representan? [Respondent types answer to question into a textbox.]

2. Lo que es su edad? [Respondent selects one response from multiple choices.]

- Bajo 25
- 25-44
- 45-64
- 65-74
- 75 o mayores

3. Carrera (*Información Opcional*) [Respondent selects one response from multiple choices.]

- African American
- Nativo americano o de Alaska
- Asia
- Hawaiano/isleño del Pacífico
- Multirracial
- Blanco

4. Origen étnico (*Información Opcional*) [Respondent selects one response from multiple choices.]

- Hispana
- No hispanos

5. Por favor califique los siguientes instalación ocupada por necesidades de vivienda en New Braunfels. [Respondent selects one response per column for each Actividad listed.]

ACTIVIDAD	Baja Necesidad	Necesidad Moderada	Necesidad de Alto	No Sé
Reparación del hogar de menores (\$0 - \$10,000)				
Rehabilitación sustancial (\$10,000+)				

Energía eficiente mejoras/climatización				
Accesibilidad (ADA) asistencia para ancianos y discapacitados propietarios				
Pago inicial y asistencia de costo de cierre para compradores de ingresos bajos				
Otros (especifique)				

6. Por favor califique las siguientes necesidades de vivienda de alquiler en New Braunfels. [Respondent selects one response per column for each Actividad listed.]

ACTIVIDAD	Baja Necesidad	Necesidad Moderada	Necesidad de Alto	No Sé
Construcción de nuevas unidades de alquiler asequible para ingresos bajos-mod				
Vivienda transitoria para las personas sin hogar y familias				
Permanente apoyo de vivienda para indigentes				
Adicional sección 8 vales para ayuda de alquiler				
Unidades de vivienda adicional				
Otros (especifique)				

7. Por favor califique las siguientes necesidades de la comunidad de vivienda no en New Braunfels. [Respondent selects one response per column for each Actividad listed.]

ACTIVIDAD	Baja Necesidad	Necesidad Moderada	Necesidad de Alto	No Sé
Transporte de servicios públicos de transporte				
Servicios/refugio para víctimas de violencia doméstica y asalto Sexual				
Refugios de emergencia para personas sin hogar				
Servicios para niños abusados y descuidados				
Servicios para adultos mayores incluyendo comidas sobre ruedas, programas de día, transporte, etcetera				
Servicios de salud mental				
Servicios de abuso de sustancias y programas de tratamiento				
Asistencia de emergencia tales como alquiler y ayuda de la utilidad, ayuda de prescripción				
Banco de alimentos o despensas de alimentos				
Servicios de salud y clínicas de bajo costo o gratis				
Otros (especifique)				

¡GRACIAS POR TU PARTICIPACIÓN!

## Grantee Unique Appendices



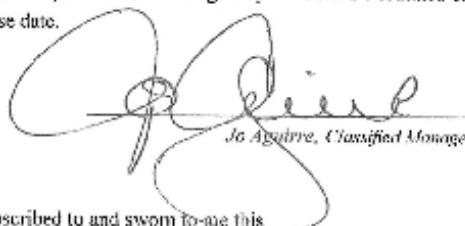
P. O. BOX 311328  
New Braunfels, TX 78131  
830-625-9144

**STATE OF TEXAS  
COUNTY OF COMAL**

Jo Aguirre, being duly sworn, says:

That she is Designee of the *NEW BRAUNFELS HERALD-ZEITUNG*, a daily newspaper of general circulation, printed and published in New Braunfels, Comal County, Texas; that the publication, a copy of which is attached hereto, was published in the said newspaper on the following dates:  
06/04/2023

That said publication was regularly issued and circulated on those date.



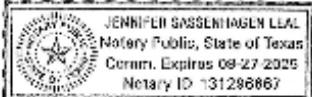
Jo Aguirre, Classified Manager

Subscribed to and sworn to me this  
7th day of June, 2023



Jennifer L. Leal, Business Manager, Comal County, Texas

My commission expires: September 27, 2025



Act #19383 Ad #1127531

City of NB - Purchasing/Finance  
Yvette Alvarado  
550 Landa St.  
New Braunfels, TX 78130

## Affidavit of Publication



**NEWBRAUNFELS**  
**Herald-Zeitung**  
Community newspaper of the Comal Valley

**Affidavit of Publication**

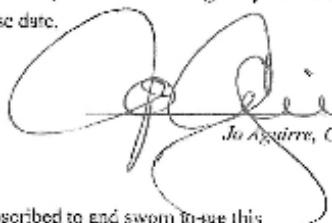
P. O. BOX 311328  
New Braunfels, TX 78131  
830-625-8144

**STATE OF TEXAS  
COUNTY OF COMAL**

Jo Aguirre, being duly sworn, says:

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06/04/2023

That said publication was regularly issued and circulated on those dates.



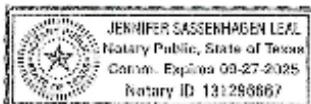
*Jo Aguirre*  
Jo Aguirre, Classified Manager

Subscribed to and sworn to say this  
7th day of June, 2023



*Jennifer Sassenhagen Leal*  
Jennifer S. Leal, Business Manager, Comal County, Texas

*My commission expires: September 27, 2025*



Acc #19383 Ad #1127531

City of NB - Purchasing/Finance  
Yvette Alvarado  
550 Landa St.  
New Braunfels, TX 78130



## **IMPEDIMENTS AND REMEDIAL ACTIVITIES**

### **Introduction**

The conditions that create or foster impediments to fair housing choice generally have existed for many years. Action required to resolve or eliminate those conditions also require years. The first step to eliminating barriers to housing choice for members of the protected classes is to identify effective actions that can be implemented by the City.

The impediments to fair housing choice identified in the previous AI remain today and are, therefore, included in this AI update. This section described the impediments to fair housing choice that emerged from the data analysis, public engagement and outreach, and policy review.

The primary impediments to fair housing choice identified in the AI include the following:

- An inadequate supply of affordable housing (rental and for sale)
- The lack of public transportation to efficiently connect people with employment and other community assets
- Public opposition to new affordable housing developments, homeless shelters, and supportive housing projects
- An inadequate level of funding to address affordable housing within the City

### **Inadequate Supply of Affordable Housing**

The City's inventory of housing affordable to households up to 80% of AMI is inadequate to meet the demand as evidence by:

- Nearly half (45.3%) of renters are paying more than 30% of their household income toward rent alone. When adding utility costs, the percent of renters paying more than 30% for total housing costs, rises to approximately 55%. For homeowners, 14.3% of homeowners with no mortgage and 22.6% of owners with a mortgage are paying more than 30% on their housing costs, with nearly 15% of all owners paying more than 50% of income on housing costs.
- More than 13% of all housing built before 1970 do not have features that are accessible to persons with disabilities.
- With 55.8% of all housing built after 2000, relative housing costs are higher than for older houses. Likewise, with 70.2% of housing being single family, rents are higher than would be the case with a greater proportion of multi-family units.
- There is a lack of property owners who are accepting Housing Choice Vouchers, and an

inadequate supply of public housing units and Housing Choice Vouchers as evidenced by a wait list time of three to five years.

These trends impact members of the protected classes disproportionately and contribute to the following adverse outcomes:

- Persons with disabilities have lower rates of employment and lower earnings than people without disabilities
- Female-headed households with children live in poverty at much higher rates than married couples with children
- Blacks and Hispanics are more likely to be unemployed than other groups

#### **Lack of Public Transportation**

- Lack of public transportation limits employment options for households without vehicles. Being able to commute to a job using reliable transportation contributes to stable employment which contributes to stable housing.

#### **Public Opposition to New Affordable Housing Developments, Homeless Shelters, and Supportive Housing Programs**

During public meetings, City residents continue to oppose new affordable housing developments, homeless shelters, and supportive housing programs. Some residents oppose the density, others the types of tenants, others an increase in crime, and others fear property values will decline. Since members of the protected classes – large families with children, people with disabilities, non-White households – are more likely to need affordable housing, this becomes a fair housing issue that restricts housing choice if new development plans are denied based solely on public opposition.

#### **Inadequate Funding Level**

Within the City of New Braunfels, the resources to finance affordable housing development are extremely limited. Federal funding from the Community Development Block Grant cannot address the demand given the amount of the award and the City is not a Participating Jurisdiction for HOME funds. The LIHTC program is available through the State of Texas and the City will support any viable application from housing developers.

### **IMPEDIMENTS AND ACTION STEPS**

#### **Demographic Impediments and Action Steps**

**Impediment 1:** Low- to moderate-income residents throughout the community are lacking financial independence and skilled labor and blue-collar job opportunities. The job opportunities in the immediate area are primarily white-collar professional jobs.

**Action Step 1a:** The City will continue to use CDBG funds to assist in supporting local social service agencies that provide emergency food, meals on wheels, rent/utility assistance, and other important social services for low- to moderate-income residents, particularly elderly, disabled, and homeless.

**Action Step 1b:** The City will continue to discuss and evaluate plans to provide public transportation within the City.

#### **Housing Impediments and Action Steps**

**Impediment 2:** New Braunfels has a shortage of affordable rental housing and housing for sale.

**Action Step 2a:** The City established the Workforce Housing Advisory Committee in 2019 to study the issue of affordable housing and make recommendations to the City leadership and the City Council.

**Action Step 2b:** Though the City acknowledges the impediment, there is no remedy it can take to directly address the issue. The City will investigate ways in which the CDBG staff can collaborate with the Public Housing Authority and affordable housing providers and developers in the delivery of affordable housing options. The City will meet with the New Braunfels Housing Authority at least annually to investigate collaboration activities.

**Action Step 2c:** The City will continue to review all applications to the State for Low Income Housing Tax Credits and will support viable projects.

**Action Step 2d:** The City will continue to review and approve, when viable, applications for funding by non-profits to provide down payment and closing cost assistance to first time homebuyers who are low- to moderate-income.

**Impediment 3:** Possible predatory lending for homes in new subdivisions and denial of loans to minorities or moderate-income.

**Action Step 3a & b:** The City has no authority to recommend, much less require, builders and independent lenders to require down-payments and closing cost payments and to not over mortgage the property. However, during the next five (5) years, the City will work with regional groups, including the Fair Housing Council of

Greater San Antonio, the Texas Homebuyer Program, and Habitat for Humanity, to attempt to have first-time homebuyer counseling and education available in or near New Braunfels and advertised throughout the city.

**Impediment 4:** New Braunfels has a shortage of affordable and safe rental units for disabled individuals.

**Action Step 4:** Though the City acknowledges the impediment, there is no remedy it can take to directly address the issue. The City has not received any fair housing complaints within the past five years. The City will investigate all complaints filed by or on behalf of a disabled person who has been unable to secure accessible housing, not allowed to make reasonable accessibility modifications, or not allowed to have a service animal or caregiver in their unit.

**Impediment 5:** Possible discrimination against protected classes by property owners, realtors, lenders, and homeowners associations.

**Action Step 5:** The City will continue to enforce the Fair Housing Ordinance and have a Fair Housing Officer who is responsible for (1) providing educational materials and/or workshops on fair housing; (2) receiving and investigating fair housing complaints; (3) assisting complainants in filing documentation with the appropriate authorities; (4) reviewing City policies to ensure there is no violation to the Fair Housing Act or related Acts; and, (5) maintaining a log of all fair housing activities, inquiries, and complaints with the outcomes.

**Impediment 6:** Many low- to moderate-income and protected class homeowners are unable to repair their homes, making the homes inefficient and, often, dangerous as well as causing a decline in the neighborhood.

**Action Step 6:** The City will continue to provide minor housing repair and accessibility retrofitting to owner-occupied housing for low- to moderate-income owners, particularly the elderly and disabled.

#### **Access to Opportunity Impediments and Action Steps**

**Impediment 7:** Due to the age of some residential areas in New Braunfels, public infrastructure and facilities are either inadequate or deteriorating limiting access to residents, particularly LMI and protected class residents.

**Action Step 7:** The City will continue to invest CDBG, Capital Improvement, and general funds into the upgrades to the infrastructure and public facilities in the areas with low-income residents and high minority concentrations.

**Impediment 8:** Aging neighborhoods in New Braunfels have numerous code violations and abandoned properties that are hindering the health and safety of the residents and preventing the areas from becoming desirable for desegregation and redevelopment.

**Action Step 8a:** The City will continue to focus code enforcement in the CDBG service areas and other older mixed-use, mixed-income communities, particularly those with a concentration of minorities and elderly.

**Action Step 8b:** The City will continue to demolish and clear substandard and blighted properties in low-income and minority neighborhoods.

#### **Legislative and Regulatory Impediments and Action Steps**

**Impediment 9:** Fair Housing rights are not generally known throughout New Braunfels and Fair Housing advocates in the region are generally unaware of fair housing violations in the City.

**Action Step 9a:** City staff will include a fair housing information component to all CDBG public hearings, stakeholder meetings and workshops

**Action Step 9b:** City staff will conduct at least one (1) activity per year during Fair Housing Month. These may include postings on the City website, providing educational pamphlets to be given to local libraries and community centers, independent fair housing workshops open to City staff, realtors, lenders, property owners, public service agencies, and the public.

**Action Step 9c:** Though the City has a comprehensive Fair Housing Ordinance, the public is not generally aware of it or that they can file a complaint with the City. The City will maintain on its official website a posting about the Fair Housing Ordinance and how residents can file a complaint about any violations.

## Grantee SF-424's and Certification(s)

OMB Number: 4040-0004  
Expiration Date: 12/31/2022

Application for Federal Assistance SF-424		
* 1. Type of Submission:	* 2. Type of Application:	* If Revision, select app update letter(s)
<input type="checkbox"/> Preapplication <input checked="" type="checkbox"/> Application <input type="checkbox"/> Changed/Corrected Application	<input checked="" type="checkbox"/> New <input type="checkbox"/> Continuation <input type="checkbox"/> Revision	<input type="text"/>
* 3. Date Received:	4. Applicant Identifier:	
20140208	B-23-HC-48-0512	
5a. Federal Entity Identifier	5b. Federal Award Identifier	
<input type="text"/>	<input type="text"/>	
State Use Only:		
6. Date Received by State:	7. State Application Identifier	
<input type="text"/>	<input type="text"/>	
8. APPLICANT INFORMATION:		
* a. Legal Name: <input type="text"/> City of New Braunfels		
* b. Employer/Taxpayer Identification Number (EIN/TIN): <input type="text"/> * c. DFI: <input type="text"/> 146001774 <input type="text"/> 0930100004060		
d. Address:		
* Street:	<input type="text"/> 550 Linda Street.	
Street2:	<input type="text"/>	
* City:	<input type="text"/> New Braunfels	
County/Parish:	<input type="text"/> Comal	
* State:	<input type="text"/> TX- Texas	
Province:	<input type="text"/>	
* Country:	<input type="text"/> USA: UNITED STATES	
* Zip/Postal Code:	<input type="text"/> 78130-6110	
e. Organizational Unit:		
Department Name:	Division Name:	
<input type="text"/> Finance	<input type="text"/> Grants	
f. Name and contact information of person to be contacted on matters involving this application:		
Prefix:	<input type="text"/>	* First Name: <input type="text"/> Jennifer
Middle Name:	<input type="text"/>	
* Last Name:	<input type="text"/> Garcia	
Suffix:	<input type="text"/>	
Title:	<input type="text"/> Grants Coordinator	
Organizational Affiliation:		
<input type="text"/>		
* Telephone Number:	<input type="text"/> 830-221-1000	Fax Number: <input type="text"/>
* Email:	<input type="text"/> jgarcia@newbraunfels.org	

Application for Federal Assistance SF-424				
<p>* 9. Type of Applicant 1: Select Applicant Type:</p> <p><input checked="" type="checkbox"/> City or Township Government</p> <p>Type of Applicant 2: Select Applicant Type:</p> <p><input type="checkbox"/></p> <p>Type of Applicant 3: Select Applicant Type:</p> <p><input type="checkbox"/></p> <p>* Other (specify): <input type="text"/></p>				
<p>* 10. Name of Federal Agency:</p> <p><input type="text"/> U.S. Department of Housing and Urban Development</p>				
<p>11. Catalog of Federal Domestic Assistance Number:</p> <p><input type="text"/> 14.216</p> <p>CFDA Title: <input type="text"/> Community Development Block Grant</p>				
<p>* 12. Funding Opportunity Number: <input type="text"/></p> <p>* Title: <input type="text"/></p>				
<p>13. Competition Identification Number: <input type="text"/></p> <p>Title: <input type="text"/></p>				
<p>14. Areas Affected by Project (Cities, Counties, States, etc.): <input type="text"/></p> <p>Add Attachment      Delete Attachment      View Attachment</p>				
<p>* 15. Descriptive Title of Applicant's Project: <input type="text"/> Community Development Block Grant - Program Year 2023</p>				
<p>Attach supporting documents as specified in agency instructions.</p> <p>Add Attachments      Delete Attachments      View Attachments</p>				

Application for Federal Assistance SF-424	
16. Congressional Districts Of:	
*a. Applicant	TX-021
*b. Program/Project: TX-021	
Attach an additional list of Program/Project Congressional Districts if needed.	
<input type="button" value="Add Attachment"/> <input type="button" value="Delete Attachment"/> <input type="button" value="View Attachment"/>	
17. Proposed Project:	
*a. Start Date:	10/01/2023
*b. End Date: 09/30/2024	
18. Estimated Funding (\$):	
*a. Federal	458,880.00
*b. Applicant	██████████
*c. State	██████████
*d. Local	██████████
*e. Other	██████████
*f. Program Income	██████████
*g. TOTAL	150,000.00
* 19. Is Application Subject to Review By State Under Executive Order 12372 Process?	
<input type="checkbox"/> a. This application was made available to the State under the Executive Order 12372 Process for review on <input type="text"/> . <input type="checkbox"/> b. Program is subject to E.O. 12372 but has not been selected by the State for review. <input checked="" type="checkbox"/> c. Program is not covered by E.O. 12372.	
* 20. Is the Applicant Delinquent On Any Federal Debt? (If "Yes," provide explanation in attachment.)	
<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
If "Yes", provide explanation and attach	
<input type="button" value="Add Attachment"/> <input type="button" value="Delete Attachment"/> <input type="button" value="View Attachment"/>	
21. By signing this application, I certify (1) to the statements contained in the list of certifications* and (2) that the statements herein are true, complete and accurate to the best of my knowledge. I also provide the required assurances** and agree to comply with any resulting terms if I accept an award. I am aware that any false, fictitious, or fraudulent statements or claims may subject me to criminal, civil, or administrative penalties. (U.S. Code, Title 21, Section 1001)	
<input checked="" type="checkbox"/> ** I AGREE <small>* The list of certifications and assurances, or an internet site where you may obtain this list, is contained in the announcement or agency specific instructions.</small>	
Authorized Representative:	
Prefix:	* First Name: Robert
Middle Name:	
* Last Name:	Caron
Suffix:	
* Title:	City Manager
* Telephone Number:	030-221-1234
* Fax Number: <input type="text"/>	
* Email: <a href="mailto:Commission@newhampshire.gov">Commission@newhampshire.gov</a>	
* Signature of Authorized Representative: 	
* Date Signed: 08/16/2023	

Public reporting burden for this collection of information is estimated to average 15 minutes per response, including time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden, to the Office of Management and Budget, Paperwork Reduction Project (0348-0342), Washington, DC 20503.

**PLEASE DO NOT RETURN YOUR COMPLETED FORM TO THE OFFICE OF MANAGEMENT AND BUDGET. SEND IT TO THE ADDRESS PROVIDED BY THE SPONSORING AGENCY.**

**NOTE:** Certain of these assurances may not be applicable to your project or program. If you have questions, please contact the Awarding Agency. Further, certain Federal assistance awarding agencies may require applicants to certify to additional assurances. If such is the case, you will be notified.

As the duly authorized representative of the applicant, I certify that the applicant:

1. Has the legal authority to apply for Federal assistance, and the institutional, managerial and financial capability (including funds sufficient to pay the non-Federal share of project costs) to ensure proper planning, management and completion of project described in this application.
2. Will give the awarding agency, the Comptroller General of the United States and, if appropriate, the State, the right to examine all records, books, papers, or documents related to the assistance; and will establish a proper accounting system in accordance with generally accepted accounting standards or agency directives.
3. Will not dispose of, modify the use of, or change the terms of the real property title or other interest in the site and facilities without permission and instructions from the awarding agency. Will record the Federal awarding agency directives and will include a covenant in the title of real property acquired in whole or in part with Federal assistance funds to assure non-discrimination during the useful life of the project.
4. Will comply with the requirements of the assistance awarding agency with regard to the drafting, review and approval of construction plans and specifications.
5. Will provide and maintain competent and adequate engineering supervision at the construction site to ensure that the complete work conforms with the approved plans and specifications and will furnish progressive reports and such other information as may be required by the assistance awarding agency or State.
6. Will initiate and complete the work within the applicable time frame after receipt of approval of the awarding agency.
7. Will establish safeguards to prohibit employees from using their positions for a purpose that constitutes or presents the appearance of personal or organizational conflict of interest, or personal gain.
8. Will comply with the Intergovernmental Personnel Act of 1970 (42 U.S.C. §§4726-4763) relating to prescribed standards of merit systems for programs funded under one of the 19 statutes or regulations specified in Appendix A of OPM's Standards for a Merit System of Personnel Administration (5 C.F.R. 900, Subpart F).
9. Will comply with the Lead-Based Paint Poisoning Prevention Act (42 U.S.C. §§4801 et seq.) which prohibits the use of lead-based paint in construction or rehabilitation of residence structures.
10. Will comply with all Federal statutes relating to non-discrimination. These include but are not limited to: (a) Title VI of the Civil Rights Act of 1964 (P.L. 88-352) which prohibits discrimination on the basis of race, color or national origin; (b) Title IX of the Education Amendments of 1972, as amended (20 U.S.C. §§1681, 1683, and 1685-1686), which prohibits discrimination on the basis of sex; (c) Section 504 of the Rehabilitation Act of 1973, as amended (29 U.S.C. §794), which prohibits discrimination on the basis of handicaps; (d) the Age Discrimination Act of 1975, as amended (42 U.S.C. §§6101-6107), which prohibits discrimination on the basis of age; (e) the Drug Abuse Office and Treatment Act of 1972 (P.L. 92-256), as amended relating to nondiscrimination on the basis of drug abuse; (f) the Comprehensive Alcohol Abuse and Alcoholism Prevention, Treatment and Rehabilitation Act of 1970 (P.L. 91-616), as amended, relating to nondiscrimination on the basis of alcohol abuse or alcoholism; (g) §§623 and 527 of the Public Health Service Act of 1912 (42 U.S.C. §§290 dd-3 and 290 ee-3), as amended, relating to confidentiality of alcohol and drug abuse patient records; (h) Title VIII of the Civil Rights Act of 1968 (42 U.S.C. §§3601 et seq.), as amended, relating to nondiscrimination in the sale, rental or financing of housing; (i) any other nondiscrimination provisions in the specific statute(s) under which application for Federal assistance is being made; and (j) the requirements of any other nondiscrimination statute(s) which may apply to the application.

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Prescribed by OMB Circular A-102

11. Will comply, or has already complied, with the requirements of Titles II and III of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (P.L. 91-646) which provide for fair and equitable treatment of persons displaced or whose property is acquired as a result of Federal and federally-assisted programs. These requirements apply to all interests in real property acquired for project purposes regardless of Federal participation in purchases.

12. Will comply with the provisions of the Hatch Act (5 U.S.C. §§1501-1508 and 7324-7328) which limit the political activities of employees whose principal employment activities are funded in whole or in part with Federal funds.

13. Will comply, as applicable, with the provisions of the Davis-Bacon Act (40 U.S.C. §§278a to 278a-7), the Copeland Act (40 U.S.C. §276c and 18 U.S.C. §874), and the Contract Work Hours and Safety Standards Act (40 U.S.C. §§327-335) regarding labor standards for federally-assisted construction subagreements.

14. Will comply with flood insurance purchase requirements of Section 102(a) of the Flood Disaster Protection Act of 1973 (P.L. 93-234) which requires recipients in a special flood hazard area to participate in the program and to purchase flood insurance if the total cost of insurable construction and acquisition is \$10,000 or more.

15. Will comply with environmental standards which may be prescribed pursuant to the following: (a) institution of environmental quality control measures under the National Environmental Policy Act of 1969 (P.L. 91-190) and Executive Order (EO) 11514; (b) notification of violating facilities pursuant to EO 11738; (c) protection of wetlands pursuant to EO 11980; (d) evaluation of flood hazards in floodplains in accordance with EO 11986; (e) assurance of project consistency with the approved State management program developed under the Coastal Zone Management Act of 1972 (16 U.S.C. §§1451 et seq.); (f) conformity of Federal actions to State (Clean Air) implementation Plans under Section 176(c) of the Clean Air Act of 1963, as amended (42 U.S.C. §§7401 et seq.); (g) protection of underground sources of drinking water under the Safe Drinking Water Act of 1974, as amended (P.L. 93-523); and, (h) protection of endangered species under the Endangered Species Act of 1973, as amended (P.L. 93-205).

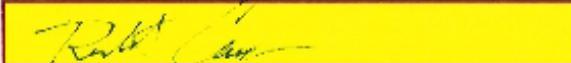
16. Will comply with the Wild and Scenic Rivers Act of 1968 (16 U.S.C. §§1271 et seq.) related to protecting components or potential components of the national wild and scenic rivers system.

17. Will assist the awarding agency in assuring compliance with Section 106 of the National Historic Preservation Act of 1966, as amended (16 U.S.C. §470), EO 11693 (identification and protection of historic properties), and the Archaeological and Historic Preservation Act of 1974 (16 U.S.C. §§468a-1 et seq.).

18. Will cause to be performed the required financial and compliance audits in accordance with the Single Audit Act Amendments of 1998 and OMB Circular No. A-133, "Audits of States, Local Governments, and Non-Profit Organizations."

19. Will comply with all applicable requirements of all other Federal laws, executive orders, regulations, and policies governing this program.

20. Will comply with the requirements of Section 105(g) of the Trafficking Victims Protection Act (TVPA) of 2000, as amended (22 U.S.C. 7104) which prohibits grant award recipients or a sub-recipient from (1) Engaging in severe forms of trafficking in persons during the period of time that the award is in effect (2) Procuring a commercial sex act during the period of time that the award is in effect or (3) Using forced labor in the performance of the award or subawards under the award.

SIGNATURE OF AUTHORIZED CERTIFYING OFFICIAL	TITLE
	City Manager
APPLICANT ORGANIZATION	DATE SUBMITTED
City of New Braunfels	7/11/23

SF-424D (Rev. 7-87) Back

## CERTIFICATIONS

In accordance with the applicable statutes and the regulations governing the consolidated plan regulations, the jurisdiction certifies that:

**Affirmatively Further Fair Housing** -- The jurisdiction will affirmatively further fair housing.

**Uniform Relocation Act and Anti-displacement and Relocation Plan** -- It will comply with the acquisition and relocation requirements of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended, (42 U.S.C. 4601-4655) and implementing regulations at 49 CFR Part 24. It has in effect and is following a residential anti-displacement and relocation assistance plan required under 24 CFR Part 42 in connection with any activity assisted with funding under the Community Development Block Grant or HOME programs.

**Anti-Lobbying** -- To the best of the jurisdiction's knowledge and belief:

1. No Federal appropriated funds have been paid or will be paid, by or on behalf of it, to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with the awarding of any Federal contract, the making of any Federal grant, the making of any Federal loan, the entering into of any cooperative agreement, and the extension, continuation, renewal, amendment, or modification of any Federal contract, grant, loan, or cooperative agreement;
2. If any funds other than Federal appropriated funds have been paid or will be paid to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with this Federal contract, grant, loan, or cooperative agreement, it will complete and submit Standard Form-111, "Disclosure Form to Report Lobbying," in accordance with its instructions; and
3. It will require that the language of paragraph 1 and 2 of this anti-lobbying certification be included in the award documents for all subawards at all tiers (including subcontracts, subgrants, and contracts under grants, loans, and cooperative agreements) and that all subrecipients shall certify and disclose accordingly.

**Authority of Jurisdiction** -- The consolidated plan is authorized under State and local law (as applicable) and the jurisdiction possesses the legal authority to carry out the programs for which it is seeking funding, in accordance with applicable HUD regulations.

**Consistency with plan** -- The housing activities to be undertaken with Community Development Block Grant, HOME, Emergency Solutions Grant, and Housing Opportunities for Persons With AIDS funds are consistent with the strategic plan in the jurisdiction's consolidated plan.

**Section 3** -- It will comply with section 3 of the Housing and Urban Development Act of 1968 (12 U.S.C. 1701u) and implementing regulations at 24 CFR Part 75.

  
\_\_\_\_\_  
Signature of Authorized Official

July 11, 2023

\_\_\_\_\_  
Date

City Manager  
\_\_\_\_\_  
Title

## Specific Community Development Block Grant Certifications

The Entitlement Community certifies that:

**Citizen Participation** – It is in full compliance and following a detailed citizen participation plan that satisfies the requirements of 24 CFR 91.105.

**Community Development Plan** – Its consolidated plan identifies community development and housing needs and specifies both short-term and long-term community development objectives that have been developed in accordance with the primary objective of the CDBG program (i.e., the development of viable urban communities, by providing decent housing and expanding economic opportunities, primarily for persons of low and moderate income) and requirements of 24 CFR Parts 91 and 570.

**Following a Plan** – It is following a current consolidated plan that has been approved by HUD.

**Use of Funds** – It has complied with the following criteria:

**1. Maximum Feasible Priority.** With respect to activities expected to be assisted with CDBG funds, it has developed its Action Plan so as to give maximum feasible priority to activities which benefit low- and moderate-income families or aid in the prevention or elimination of slums or blight. The Action Plan may also include CDBG-assisted activities which the grantee certifies are designed to meet other community development needs having particular urgency because existing conditions pose a serious and immediate threat to the health or welfare of the community, and other financial resources are not available (see Optional CDBG Certification).

**2. Overall Benefit.** The aggregate use of CDBG funds, including Section 108 guaranteed loans, during program year(s) 2021, 2022, and 2023 [a period specified by the grantee of one, two, or three specific consecutive program years], shall principally benefit persons of low and moderate income in a manner that ensures that at least 70 percent of the amount is expended for activities that benefit such persons during the designated period.

**3. Special Assessments.** It will not attempt to recover any capital costs of public improvements assisted with CDBG funds, including Section 108 loan guaranteed funds, by assessing any amount against properties owned and occupied by persons of low and moderate income, including any fee charged or assessment made as a condition of obtaining access to such public improvements.

However, if CDBG funds are used to pay the proportion of a fee or assessment that relates to the capital costs of public improvements (assisted in part with CDBG funds) financed from other revenue sources, an assessment or charge may be made against the property with respect to the public improvements financed by a source other than CDBG funds.

In addition, in the case of properties owned and occupied by moderate-income (not low-income) families, an assessment or charge may be made against the property for public improvements financed by a source other than CDBG funds if the jurisdiction certifies that it lacks CDBG funds to cover the assessment.

**Excessive Force** -- It has adopted and is enforcing:

1. A policy prohibiting the use of excessive force by law enforcement agencies within its jurisdiction against any individuals engaged in non-violent civil rights demonstrations; and
2. A policy of enforcing applicable State and local laws against physically barring entrance to or exit from a facility or location which is the subject of such non-violent civil rights demonstrations within its jurisdiction.

**Compliance with Anti-discrimination laws** -- The grant will be conducted and administered in conformity with title VI of the Civil Rights Act of 1964 (42 U.S.C. 2000d) and the Fair Housing Act (42 U.S.C. 3601-3619) and implementing regulations.

**Lead-Based Paint** -- Its activities concerning lead-based paint will comply with the requirements of 24 CFR Part 35, Subparts A, B, J, K and R.

**Compliance with Laws** -- It will comply with applicable laws.

  
Signature of Authorized Official

July 11, 2023

Date

City Manager  
Title

**OPTIONAL Community Development Block Grant Certification**

Submit the following certification only when one or more of the activities in the action plan are designed to meet other community development needs having particular urgency as specified in 24 CFR 570.208(c):

The grantee hereby certifies that the Annual Plan includes one or more specifically identified CDBG-assisted activities which are designed to meet other community development needs having particular urgency because existing conditions pose a serious and immediate threat to the health or welfare of the community and other financial resources are not available to meet such needs.

*Not applicable*  
\_\_\_\_\_  
Signature of Authorized Official

*Not applicable*  
\_\_\_\_\_  
Date

*Not applicable*  
\_\_\_\_\_  
Title

#### Specific HOME Certifications

The HOME participating jurisdiction certifies that:

**Tenant Based Rental Assistance** -- If it plans to provide tenant-based rental assistance, the tenant-based rental assistance is an essential element of its consolidated plan.

**Eligible Activities and Costs** -- It is using and will use HOME funds for eligible activities and costs, as described in 24 CFR §§92.205 through 92.209 and that it is not using and will not use HOME funds for prohibited activities, as described in §92.214.

**Subsidy layering** -- Before committing any funds to a project, it will evaluate the project in accordance with the guidelines that it adopts for this purpose and will not invest any more HOME funds in combination with other Federal assistance than is necessary to provide affordable housing.

*Not applicable*  
\_\_\_\_\_  
Signature of Authorized Official

*Not applicable*  
\_\_\_\_\_  
Date

*Not applicable*  
\_\_\_\_\_  
Title

### **Emergency Solutions Grants Certifications**

The Emergency Solutions Grants Program recipient certifies that:

**Major rehabilitation/conversion/renovation** – If an emergency shelter's rehabilitation costs exceed 75 percent of the value of the building before rehabilitation, the recipient will maintain the building as a shelter for homeless individuals and families for a minimum of 10 years after the date the building is first occupied by a homeless individual or family after the completed rehabilitation.

If the cost to convert a building into an emergency shelter exceeds 75 percent of the value of the building after conversion, the recipient will maintain the building as a shelter for homeless individuals and families for a minimum of 10 years after the date the building is first occupied by a homeless individual or family after the completed conversion.

In all other cases where ESG funds are used for renovation, the recipient will maintain the building as a shelter for homeless individuals and families for a minimum of 3 years after the date the building is first occupied by a homeless individual or family after the completed renovation.

**Essential Services and Operating Costs** – In the case of assistance involving shelter operations or essential services related to street outreach or emergency shelter, the recipient will provide services or shelter to homeless individuals and families for the period during which the ESG assistance is provided, without regard to a particular site or structure, so long the recipient serves the same type of persons (e.g., families with children, unaccompanied youth, disabled individuals, or victims of domestic violence) or persons in the same geographic area.

**Renovation** – Any renovation carried out with ESG assistance shall be sufficient to ensure that the building involved is safe and sanitary.

**Supportive Services** – The recipient will assist homeless individuals in obtaining permanent housing, appropriate supportive services (including medical and mental health treatment, victim services, counseling, supervision, and other services essential for achieving independent living), and other Federal, State, local, and private assistance available for these individuals.

**Matching Funds** – The recipient will obtain matching amounts required under 24 CFR 576.201.

**Confidentiality** – The recipient has established and is implementing procedures to ensure the confidentiality of records pertaining to any individual provided family violence prevention or treatment services under any project assisted under the ESG program, including protection against the release of the address or location of any family violence shelter project, except with the written authorization of the person responsible for the operation of that shelter.

**Homeless Persons Involvement** – To the maximum extent practicable, the recipient will involve, through employment, volunteer services, or otherwise, homeless individuals and families in constructing, renovating, maintaining, and operating facilities assisted under the ESG program, in providing services assisted under the ESG program, and in providing services for occupants of facilities assisted under the program.

**Consolidated Plan** – All activities the recipient undertakes with assistance under ESG are consistent with its consolidated plan.

**Discharge Policy** – The recipient will establish and implement, to the maximum extent practicable and where appropriate, policies and protocols for the discharge of persons from publicly funded institutions or systems of care (such as health care facilities, mental health facilities, foster care or other youth facilities, or correction programs and institutions) in order to prevent this discharge from immediately resulting in homelessness for these persons.

*Not applicable*

Signature of Authorized Official

*Not applicable*

Date

*Not applicable*

Title

**Housing Opportunities for Persons With AIDS Certifications**

The HOPWA grantee certifies that:

**Activities** -- Activities funded under the program will meet urgent needs that are not being met by available public and private sources.

**Building** -- Any building or structure assisted under that program shall be operated for the purpose specified in the consolidated plan:

1. For a period of not less than 10 years in the case of assistance involving new construction, substantial rehabilitation, or acquisition of a facility.
2. For a period of not less than 3 years in the case of assistance involving non-substantial rehabilitation or repair of a building or structure.

*Not applicable*  
\_\_\_\_\_  
Signature of Authorized Official

*Not applicable*  
\_\_\_\_\_  
Date

*Not applicable*  
\_\_\_\_\_  
Title

## APPENDIX TO CERTIFICATIONS

### INSTRUCTIONS CONCERNING LOBBYING CERTIFICATION:

#### **Lobbying Certification**

This certification is a material representation of fact upon which reliance was placed when this transaction was made or entered into. Submission of this certification is a prerequisite for making or entering into this transaction imposed by section 1352, title 31, U.S. Code. Any person who fails to file the required certification shall be subject to a civil penalty of not less than \$10,000 and not more than \$100,000 for each such failure.