2020-2022 CONSOLIDATED PLAN
& 2020 ACTION PLAN
...for housing and community development

A REPORT FOR THE U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT
Community Development Block Grant (CDBG) Program
HOME Investment Partnerships (HOME)

APPROVED: JULY 21, 2020
CONSOLIDATED PLAN PREPARED BY:

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CITY COUNCIL APPROVAL:

- Presented on June 2, 2020  
- Approval on July 21, 202

HUD APPROVAL:

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- Approval on September 14, 2020
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EXECUTIVE SUMMARY

EXPECTED 3-YEAR FUNDING AMOUNT 2020-2022

<table>
<thead>
<tr>
<th>CDBG</th>
<th>HOME</th>
<th>CBDG-CV</th>
</tr>
</thead>
<tbody>
<tr>
<td>$618,736</td>
<td>$1,516,065</td>
<td>$3,155,382</td>
</tr>
</tbody>
</table>

City of Denton Community Needs

- Affordable Housing
- No Hunger
- Good Health and Well-being
- Family Stability
- Special Needs
- Making Homelessness Rare, Brief, and Nonrecurring
- Transportation Access
- Economic Security

STRATEGIC & ACTION PLAN PRIORITIES

<table>
<thead>
<tr>
<th>HOUSEHOLDS</th>
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</tr>
<tr>
<td>4,500</td>
<td>PUBLIC SERVICES</td>
</tr>
<tr>
<td>24,000</td>
<td>PUBLIC FACILITIES, IMPROVEMENTS &amp; INFRASTRUCTURE</td>
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<td>PLANNING &amp; ADMINISTRATION</td>
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A REPORT FOR THE U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT
Community Development Block Grant (CDBG) Program
HOME Investment Partnerships (HOME)
Executive Summary

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

1. **Introduction**

The U.S. Department of Housing and Urban Development (HUD) Consolidated Plan (Con Plan) is mandated by federal law and regulations administered by HUD. It is required for the City of Denton to receive federal funding to provide lower and moderate-income households with safe, stable communities, including decent housing, a suitable living environment, and expanded economic opportunities. Eligible activities include housing development, rehabilitation and preservation; improving community facilities and neighborhood infrastructure; public services; economic development; planning; and program administration. These federal funds are received annually to support the Con Plan and the activities outlined in the City’s annual Action Plan which describes the planned investment for the following HUD grants to implement specific activities for that year. At the end of each program year of the Con Plan, the City’s activities implemented to meet the goals in the Action Plan are reported in the HUD Consolidated Annual Performance and Evaluation Report (CAPER).

- **Community Development Block Grant (CDBG)** was authorized under Title 1 of the Housing and Community Development Act of 1974. This formula-based funding allocation program is designed to develop viable communities by providing decent housing, a suitable living environment, and expanding economic opportunities for low and moderate-income persons.

- **HOME Investment Partnership Program (HOME)** was authorized under title II of the Cranston Gonzalez National Affordable Housing Act of 1990. This formula-based funding allocation program was designed to increase homeownership and affordable housing opportunities for low and very low-income persons.

Consolidated Plans must be prepared and submitted to HUD every three to five years. Based on the timing of the 2020 Census and a City initiated affordable housing assessment project expected to be completed in late 2020, the City will be implementing a three-year Con Plan cycle for program years (PY)\(^1\) including PY2020-2021, PY2021-2022, and PY2022-2023. This Con Plan document follows the HUD prescribed sections and formatting.

\(^1\)While the City of Denton fiscal year (FY) is October 1 – September 30, the HUD program year (PY) is August 1 – July 31. The funding awarded for CDBG and HOME projects begins on August 1 each year.
The City’s Consolidated Plan and annual Action Plan activities are developed in collaboration with local citizens, coalitions and collaboratives, nonprofit organizations, educational community, elected leaders, council appointed citizen advisory committees, and other community stakeholders. This engagement helps prioritize community development actions and the process allows for more effective planning for Denton's CDBG and HOME program activities. This Con Plan consists of the following sections:

- **Executive Summary (ES)** – Provides a brief introduction and summaries evaluating past performance, citizen participation process and consultation process, and planning.
- **Process (PR)** – Communicates the consultation and citizen participation process undertaken to collect information from residents and stakeholders on community needs.
- **Needs Assessment (NA)** – Analyzes demographics, needs related to affordable housing, special needs housing, community development and homelessness.
- **Housing Market Analysis (MA)** – Examines the supply of affordable housing units, the regional housing market, conditions that impact community needs and the programs that address those needs.
- **Strategic Plan (SP)** – Identifies specific goals for Denton based on the highest priority needs informed by the Needs Assessment, Market Analysis, and extensive consultation with citizens and community groups.
- **Action Plan (AP)** – Describes the planned investment of resources allocated to implement specific programs that meet the year’s strategic goals.

**COVID-19 NOTE**

The goals and objectives outlined in the 2020-2022 Con Plan for the period beginning August 2020 through July 2023 are based on priorities identified through an analysis of ongoing community needs as well as a community outreach process. This analysis and public input took place from October 2019 through February 2020. The strategy included in the Con Plan was based on a snapshot of economic, housing, and social service data available at that time.

In March 2020 the U.S. Centers for Disease Control (CDC), health departments, and governments started responding to the COVID-19 pandemic outbreak. This pandemic event is making a significant impact on the economy, housing market, and needs of the residents of Denton, Texas. While data is limited, the pandemic is having a severe impact on Denton residents and especially low and moderate-income and other vulnerable residents that are the focus of this plan. The City of Denton will continue to evaluate and analyze local conditions related to the goals and objectives presented in the Con Plan. The City of Denton Citizen Participation Plan (ATTACHMENT 1) provides the City an opportunity to make minor and substantial amendments to the Con Plan if the needs of Denton continue to be impacted further due to the world-wide pandemic event.
2. **Summary of the objectives and outcomes identified in the Plan Needs Assessment**

The Con Plan includes analysis of housing and community development data provided by HUD for consolidated planning that informs the priorities, strategies, and actions that the City will undertake to address housing and community development needs over the next three years.

During the development of the Consolidated Plan, priority needs were identified. These will be discussed in detail in later sections. These priority needs align with HUD’s goals for safe, stable communities, including *Decent Housing, a Suitable Living Environment, and Expanded Economic opportunities* as well as the City’s key focus area for *Safe, Liveable, and Family-Friendly Communities*. The priority community needs are summarized below:

1. **Affordable Housing** – The preservation and creation of quality affordable and supportive housing;
2. **No Hunger** – Reducing food insecurity;
3. **Good Health and Well-being** – Increasing availability and access to Health, Mental Health, and Behavioral Health Care;
4. **Family Stability** – Improving safety, support and opportunity including access to affordable childcare;
5. **Special Needs** – Increasing availability and access to services meeting the special needs of vulnerable populations such as seniors, disabled, veterans, abused and neglected children, and victims of domestic violence;
6. **Making Homelessness Rare, Brief, and Nonrecurring**;
7. **Transportation Access** – increasing housing and workforce stability by increasing access to transportation resources; and
8. **Economic Security** – improving income mobility, educational attainment, and workforce development;

3. **Evaluation of past performance**

The City’s activities to meet the goals in the 2015-2019 Consolidated Plan are reported annually in the HUD **Consolidated Annual Performance and Evaluation Report (CAPER)**. The City of Denton has a strong record of performance and was able to meet most of its 2015-2019 Consolidated Plan five-year goals. Below is an overview of the proposed goals and the actual accomplishments including a completion rate. During the last five years, the Con Plan goals were focused on affordable rental housing preservation (55 household housing units), home repair (235 household housing units), homeownership (30 household housing units), public facility improvements (10,000 persons assisted), and public services activities (2,800 persons assisted) with an emphasis on homeless assistance (6,500 persons assisted).
|------|----------------|--------------------------|----------------------------------|-----------------|
| **Affordable Rental Units**  
Denton Affordable Housing Corporation, Fairoaks (Section 202) | Household Housing Units | 55 | 105 | 190.91% |
| **Homeless Assistance and Prevention**  
Denton County Friends of the Family, The Salvation Army | Persons Assisted | 6,500 | 11,006 | 169.32% |
| **Homeownership Assistance**  
City Housing Program | Household Housing Units | 30 | 20 | 66.67% |
| **Housing Rehabilitation**  
City Housing Programs | Household Housing Units | 235 | 131 | 55.74% |
| **Public Facilities and Infrastructure Improvements**  
Carl Young Park and Quakertown Park Restrooms, Fred Moore Day Nursery School Improvements, Fred Moore Park Improvements, Denton City County Day School, McKinney Sidewalks, MLK and Quakertown Park Playground Replacements, Denton Community Food Center and Court Appointed Special Advocates ADA Project. | Persons Assisted | 10,000 | 9,612 | 96.12% |
| **Public Services**  
Summer Kids Camp, Denton City County Day School, Health Services of North Texas, SPAN Inc. | Persons Assisted | 2,800 | 2,279 | 81.39% |

*Accomplishments reported as of April 30, 2020 for a total of 4.75 years.

4. **Summary of citizen participation process and consultation process**


The City’s Citizen Participation Plan (CPP) (ATTACHMENT 1) aligns the current regulations and the City’s strategy for a citizen participation process that actively engages and encourages citizen participation that helps prioritize community development actions and the process allows for more effective planning for Denton’s CDBG and HOME program activities.
A summary of the City’s citizen participation process and consultation process are in PR-10 Consultation and PR-15 Citizen Participation.

5. Summary of public comments

To review the video of all public comments received during the public hearing, please link to the City Council video archive at: https://dentontx.new.swagit.com/videos/66836. The citizen survey is available in ATTACHMENT 3, and the recent comments related to this Consolidated Plan during the 30-day comment period are provided in (ATTACHMENT 3).

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

All comments received were considered in the development of the 2020-22 Consolidated Plan.

7. Summary

The City participates in the CDBG and HOME programs and is required to prepare and submit an action plan for HUD approval to receive these funds. The Consolidated Plan is the City's application of federal funds under HUD’s formula grant programs and serves the following functions in effort to identify objectives and outcomes:

- A planning document for the City, which builds upon a citizen participation process;
- A process for assessing community needs and analyzing housing data;
- A strategy to be followed in carrying out HUD programs; and
- An action plan that provides a basis for assessing performance.

PRIORITIZATION OF FEDERAL FUNDING

The City recognizes that the City's annual HUD entitlement and formula allocations are not sufficient to meet all housing and community needs. The needs of our community continually outweigh the resources available to address those needs. Therefore, it is necessary to prioritize the use of available funds for the most pressing community development needs for housing, hunger, homelessness, and those with special needs disproportionately impacted by the effects of poverty and to allocate funding to high performing programs.

Since community needs exceed existing resources, additional funds are sought to provide programs and activities are available for those in need of assistance. To address these priority needs, the City seeks to maximize coordination and cooperation among agencies and
organizations to make best use of these limited funds. Also, the City recognizes that leveraging resources is critical to achieving the City’s goals. The City continues to cultivate funding partners where the City's investment of CDBG and HOME funds and agency resources are aligned to better meet prioritized community needs. The City also allocates local resources to fund programs.

**DATA**

The Consolidated Plan was developed based on both quantitative and qualitative data from multiple sources. Primary data sources were provided by HUD and include the 2011-2015 Comprehensive Housing Affordability Strategy (CHAS) and the 2009-2015 American Community Survey (1-year estimates & 5-year estimates). Local data such as the Point in Time Count and community needs assessments, along with selected national sources of data, were used to provide additional context and updated information on demographics, economics, and housing market trends where available.

This Consolidated Plan and first year Annual Action Plan set forth a description of activities for the use of funds that will become available during the coming federal fiscal year, determines goals for individuals and households to be served, and describes the implementation plan. The formula allocation for the City of Denton for the Community Development Block Grant program is $1,051,794 and the HOME allocation is $505,355. The City anticipates approximately $8,000 in CDBG program income and $80,000 in HOME program income. The City also has $27,171.74 in CDBG and $114,195 in HOME funds in prior year resources for reallocation as a Substantial Amendment. Additional local resources are leveraged to fund programs.
2020-2022 CONSOLIDATED PLAN & 2020 ACTION PLAN
... for housing and community development

THE PROCESS

EXPECTED 3-YEAR FUNDING AMOUNT 2020-2022

- Affordable Housing
- No Hunger
- Good Health and Well-being
- Family Stability
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- Making Homelessness Rare, Brief, and Nonrecurring
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STRATEGIC & ACTION PLAN PRIORITIES

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A REPORT FOR THE U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT
Community Development Block Grant (CDBG) Program
HOME Investment Partnerships (HOME)
The Process

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

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

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

<table>
<thead>
<tr>
<th>Agency Role</th>
<th>Name</th>
<th>Department/Agency</th>
</tr>
</thead>
<tbody>
<tr>
<td>CDBG Administrator</td>
<td>DENTON</td>
<td>Community Development</td>
</tr>
<tr>
<td>HOME Administrator</td>
<td>DENTON</td>
<td>Community Development</td>
</tr>
</tbody>
</table>

Table 1 – Responsible Agencies

Narrative

The City of Denton is the lead agency for the development, administration, and review of the HUD Consolidated Plan and Annual Action Plan. Administrative support and oversight is provided by Community Development. The Consolidated Plan and Annual Action Plan provide a comprehensive strategy to address the City’s housing and community needs with CDBG and HOME funds. All CDBG and HOME-funded projects are required to complete a thorough application process to ensure eligibility and are monitored by Community Development for ongoing compliance with applicable federal rules and regulations. Other offices and agencies responsible for executing and administering activities covered by the Consolidated Plan include the City offices for Finance, Development Services, Engineering, Parks and Recreation, Public Affairs, and the City Attorney.

Consolidated Plan Public Contact Information
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Denton, Texas 76205
Phone: (940) 349-7726
Fax: (940) 349-7753
E-mail: community.development@cityofdenton.com
Website: http://www.cityofdenton.com
PR-10 Consultation - 91.100, 91.110, 91.200(b), 91.300(b), 91.215(l) and 91.315(l)

1. Introduction

The City of Denton encourages the participation of all citizens in the development of the Consolidated and Action Plans and in the review of progress in implementing plan activities. The City of Denton utilizes a variety of methods to consult with residents, social service providers, and community development organizations as well as enhance coordination between public and assisted housing providers and private and governmental health, mental health and service agencies.

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 participation process for the Consolidated Plan included public hearings, a 30-day public comment period; a community survey for citizens and non-profit agencies, participating in coalitions and committees including focus groups, consultation with various city departments; and consultation with housing providers.

The City particularly encouraged involvement by low and moderate-income households residing in areas targeted for program activities for minorities and non-English speaking persons, as well as persons with disabilities. Special effort is made to assure that low and moderate-income persons, households in areas assisted by program activities, and persons with special needs have opportunities to participate.

The City’s approach is to enhance coordination between public and assisted housing providers and private and governmental health, mental health and service agencies by holding public meetings, utilizing public comment periods; gathering community surveys accessible online and in print for citizens and non-profit agencies, through active participating in coalitions and committees, maintaining ongoing consultation with various city departments; and ongoing consultation with housing providers including nonprofits and the Denton Housing Authority.

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 Continuum of Care (CoC) sets priorities for housing and supportive services to benefit persons experiencing homelessness. The City actively participates in the Balance of State CoC.
The manager of community development for the City of Denton is the chair of the Balance of State, CoC Board of directors (2018-19, 2019-20).

This collaboration has built the framework for local housing focused strategies fundamental to making homelessness rare, brief and nonrecurring. The collaboration (consultation) with the CoC has led to full implementation of Denton’s Coordinated Entry System (CE) and Housing Priority List (HPL) offering a centralized, community-wide coordinated system of prioritizing and moving individuals experiencing homelessness to sustainable permanent housing. The HPL is a list of all households experiencing homelessness in Denton County that have completed a CE housing assessment. CE is the system and process that ensures people experiencing homelessness are quickly identified, assessed and referred to housing assistance and supportive services that promote housing stability. Denton County service providers use the HPL to quickly identify and prioritize households experiencing homelessness for housing assistance resources based on their level of need and special population prioritization status (Veterans, Chronically Homeless and Victims of Domestic Violence). This data is collected and disseminated through a dashboard provided to the public: https://www.unitedwaydenton.org/homelessness-data-denton-county

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

ESG consultation is not applicable since Denton does not receive ESG funds from HUD as an annual entitlement. However, the Texas Balance of State (BoS) Continuum of Care (CoC) does manage the local competition for the State Entitlement ESG funds allocated to the BoS from the Texas Department of Housing and Community Development (TDHCA). Since, a City of Denton staff member is Chair of the BoS, CoC Board of directors (2018-19, 2019-20) and City staff actively participate in the BoS, CoC, the City does consult with the CoC on ESG priorities for all communities in the BoS CoC.

Working in collaboration and in support of the priorities set, CoC grants are awarded locally to provide the housing and supportive services that are necessary to make a real difference in people's lives. In Denton, these funds currently fund permanent supportive housing projects, support for Coordinated Entry/HMIS, and Rapid Re-housing so individuals and families can transition out of homelessness and back into the community.

Coordination with the Continuum of Care offers both entities expanded access to funding, quality collaborative tools, and greater knowledge resources. Coordination with the CoC offers several benefits to the City of Denton and the CoC. Collaboration includes improved data collection and better management of available resources by improving the Homeless Management Information
System (HMIS). The City invests public funds for HMIS including assistance with licenses and funding for a staff position at the United Way of Denton County for HMIS/Coordinated Entry support in Denton. CoC collaboration improves the relevance of data collected through the annual Point-in-Time (PIT) homeless count and annual Housing Inventory Count (HIC). In consultation with the CoC, the City of Denton staff work with private partners and neighboring entitlement communities to implement the PIT and HIC collaboratively across Denton County.

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

<table>
<thead>
<tr>
<th>Agency/Group/Organization Type</th>
<th>Agency/Group/Organization Type</th>
<th>What section of the Plan was addressed by Consultation?</th>
<th>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</th>
</tr>
</thead>
<tbody>
<tr>
<td>Child Care Partners: Denton Christian Preschool; Denton City County Day School; Fred Moore Day Nursery School</td>
<td>Affordable Child Care Providers</td>
<td>Public Services and Public Facilities Needs</td>
<td>Affordable Child Care programs and the City participate in United Way’s Early Childhood Coalition and distributed City online survey through agency. OUTCOMES: Improved Community Coordination. Ensure high quality, affordable Child Care programs</td>
</tr>
<tr>
<td>Committee on Persons with Disabilities</td>
<td>Special Needs Citizen Committee</td>
<td>Public Services and Public Facilities</td>
<td>Review committee reports and actions, present to committee on City programs. OUTCOMES: Committee develops recommendations for improvement of local services and infrastructure for persons with disabilities.</td>
</tr>
<tr>
<td>Denton Affordable Housing Corporation</td>
<td>CHDO</td>
<td>Affordable Housing Needs</td>
<td>DAHC participates with the DC Behavioral Health Leadership Team, DC Homelessness</td>
</tr>
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<tr>
<td>Denton County MHMR</td>
<td>Mental Health Service Organization</td>
<td>Public Services Needs</td>
<td>Leadership Team along with the City and distributed City online survey through DAHC. OUTCOMES: Partners with City and other organizations to create/preserve additional affordable rental housing.</td>
</tr>
<tr>
<td>Denton County Public Health - Healthy Communities Coalition</td>
<td>Public Health Department, Coalitions</td>
<td>Public Services Needs</td>
<td>DCMHMR participates with the CoC, DC Behavioral Health Leadership Team, DC Homelessness Leadership Team along with the City and distributed City online survey through DCMHMR. OUTCOME: To improve and expand Mental Health resources/services</td>
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<td></td>
<td></td>
<td>Coalition of multiple local services providers including the City and distributed City online survey through DCPH. OUTCOME: Identify community needs, address gaps in services, and expand resources. Engage in planning activities to improve, expand, and coordinate Healthy Community resources/services.</td>
</tr>
<tr>
<td>Agency/Group/Organization Type</td>
<td>Agency/Group/Organization Type</td>
<td>What section of the Plan was addressed by Consultation?</td>
<td>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</td>
</tr>
<tr>
<td>--------------------------------</td>
<td>--------------------------------</td>
<td>--------------------------------------------------------</td>
<td>----------------------------------------------------------------------------------------------------------------------------------</td>
</tr>
<tr>
<td>Denton Housing Authority</td>
<td>PHA</td>
<td>Affordable Housing Needs</td>
<td>Requested information and data from DHA on public housing needs and distributed City online survey through DHA. OUTCOMES: Local housing organizations will work to provide additional affordable housing for Housing Choice Voucher holders and others. Opportunities for better coordination of affordable housing needs including planning.</td>
</tr>
<tr>
<td>Denton Hunger Coalition</td>
<td>Public Services Assistance Group</td>
<td>Public Services</td>
<td>Coalition of multiple local services providers including the City and distributed City online survey through DHC. City participates in DHC monthly meetings. OUTCOMES: Collaborate to identify community needs, address gaps in services, and expand resources to decrease food insecurity.</td>
</tr>
<tr>
<td>Denton Independent School District</td>
<td>Public Education Entity</td>
<td>Economic and Public Services Needs</td>
<td>Joint City and DISD meetings is hosted to increase intergovernmental collaboration and identify community needs.</td>
</tr>
<tr>
<td>Denton County Behavioral Health Leadership Team</td>
<td>Quasi-Governmental Collective Impact Project</td>
<td>Homelessness Strategy, Public Services Needs</td>
<td>City works in collaboration with partners to increase intergovernmental collaboration and identify</td>
</tr>
<tr>
<td>Agency/Group/Organization Type</td>
<td>Agency/Group/Organization Type</td>
<td>What section of the Plan was addressed by Consultation?</td>
<td>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</td>
</tr>
<tr>
<td>--------------------------------</td>
<td>-------------------------------</td>
<td>--------------------------------------------------------</td>
<td>----------------------------------------------------------------------------------------------------------------------------------</td>
</tr>
<tr>
<td>Denton County Homelessness Leadership Team &amp; Workgroups: Data, Denton County Homeless Coalition, Housing, Shelter Planning</td>
<td>Quasi-Governmental Collective Impact Project</td>
<td>Homelessness Strategy, Public Services Needs</td>
<td>City in public-private partnership funding the UW initiative. City works in collaboration with partners to increase intergovernmental collaboration and identify community needs. OUTCOMES: Making Homelessness Rare, Brief, and Nonrecurring.</td>
</tr>
<tr>
<td>Texas Homeless Network, Lead Agency for the Balance of State CoC</td>
<td></td>
<td>Homelessness Strategy, Public Service Needs</td>
<td>Continuous collaboration and consultation regarding homeless needs in the Denton area. OUTCOMES: Making Homelessness Rare, Brief and One-time.</td>
</tr>
</tbody>
</table>

Table 2 – Agencies, groups, organizations who participate

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

The City made every effort to consult all Agency types.
Other local/regional/state/federal planning efforts considered when preparing the Con Plan

<table>
<thead>
<tr>
<th>Name of Plan</th>
<th>Lead Organization</th>
<th>How do the goals of your Strategic Plan overlap with the goals of each plan?</th>
</tr>
</thead>
<tbody>
<tr>
<td>Assessment of Fair Housing</td>
<td>City of Denton (North Texas Regional Housing Assessment)</td>
<td>FHP-AI</td>
</tr>
<tr>
<td>Denton Plan 2030</td>
<td>City of Denton</td>
<td>Needs Assessment, Market Analysis, FHP-AI</td>
</tr>
<tr>
<td>Denton Development Code</td>
<td>City of Denton</td>
<td>Needs Assessment, FHP-AI</td>
</tr>
<tr>
<td>2020 Denton Mobility Plan</td>
<td>City of Denton</td>
<td>Needs Assessment, FHP-AI</td>
</tr>
<tr>
<td>Parks Master Plan</td>
<td>City of Denton</td>
<td>Needs Assessment</td>
</tr>
<tr>
<td>County Needs Assessments</td>
<td>United Way of Denton County</td>
<td>Needs Assessment</td>
</tr>
<tr>
<td>Collective Impact Initiatives</td>
<td>United Way of Denton County</td>
<td>Needs Assessment</td>
</tr>
<tr>
<td>ALICE - (Asset Limited, Income Constrained, Employed)</td>
<td>United Way of Denton County</td>
<td>Needs Assessment</td>
</tr>
<tr>
<td>CHIP - Community Health Improvement Plan</td>
<td>Denton County Health Department</td>
<td>Needs Assessment</td>
</tr>
<tr>
<td>County Health Rankings and Road Map</td>
<td>Denton County Health Department</td>
<td>Needs Assessment</td>
</tr>
<tr>
<td>Regional Data and Analysis</td>
<td>North Texas Council of Governments</td>
<td>Needs Assessment, Market Analysis</td>
</tr>
</tbody>
</table>

Table 3 – Other local / regional / federal planning efforts

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

The City partners with the United Way in Collective Impact Initiatives including the Denton County Behavioral Health Leadership Team and the Denton County Homelessness Leadership Team. This public-private partnership with these quasi-governmental teams involves direct collaboration with several adjacent units of general local government involving the cities of Denton, Flower Mound, Frisco, Lewisville, Sanger, and The Colony and the Denton County Commissioner’s Court. Denton also holds a board seat on the Denton County Transportation Authority (DCTA) board which involves cooperation and coordination of transportation resources in the area. City staff actively participate with the North Texas Council of Government offering consultation and coordination with other public entities on regional opportunities for improving the quality of life in North Central Texas such as aging services, economic development, emergency preparedness, environment, public safety, regional transportation and workforce solutions.
PR-15 Citizen Participation – 91.105, 91.115, 91.200(c) and 91.300(c)

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

2. **Summarize citizen participation process and how it impacted goal-setting**
   Citizen participation and stakeholder consultation are a key component to our City’s Consolidated Plan. Our citizen participation and consultation strategy help us:
   - Incorporate local data into planning process and validate the accuracy of this data
   - Gather input on priority needs and target areas
   - Increase coordination among community partners
   - Leverage Con Plan activities with other public and private funding sources and programs
   - Expand upon the outreach efforts of existing planning processes
   - Increase citizen feedback, buy-in, and support of Con Plan activities

Community Development took the following measures to encourage citizen participation throughout the year:

- **Strategic Partnerships and Collaborations.** The City of Denton has a very strong network of service providers including those providing housing, education, health care and other needed services. The City engages in ongoing active participation in various boards, coalitions, and committees with a commitment to building and maintaining strong collaborative relationships with community partners and interest groups. The City obtains real-time data on community needs from active, participating members of the community that included representatives from organizations providing public services as well as community residents and engaged stakeholders. Over the past four years, the United Way of Denton County, the City of Denton, the Denton Independent School District and other organizations have joined together to review and discuss the provision of services in the Denton area to maximize the benefits derived from available resources.

- **Public Hearings.** Hosted two public hearings on December 9, 2019 and January 27, 2020 to solicit citizen input on priority community needs. Published all meetings in the local newspaper, the City’s email newsletter and through the City’s social media channels.

- **Community Events.** Attended the City’s annual “State of the City” community event. The event allows city staff to engage with citizens, provide information on programs to assist
CDBG/HOME eligible families and survey citizens to gather feedback on housing and community development needs. [https://www.youtube.com/watch?v=QQkBo2ftt0k](https://www.youtube.com/watch?v=QQkBo2ftt0k)

- **Online Survey.** Web-based surveys are an effective means to complement paper-based or other traditional methods of data collection. Using web-based surveys allows us to reach a greater proportion of the population because they are easily distributed and may more successfully reach persons who rely exclusively on electronic media for news and information. The City collected surveys from November 2019 through January 31, 2020 which generated 172 responses in total. Questions focused on housing and community development needs. Community Development utilized social media and solicited City Council, community partners (nonprofits, boards, coalitions, committees), and various city departments and housing providers to assist in distributing the survey across the community. Paper surveys were also made available at meetings, hearings and City sponsored events. Paper surveys submitted were entered into the online survey. A summary of the surveys is provided in the (ATTACHMENT 3).

1These boards/coalitions/committees in 2019-20 include the following: Early Childhood Coalition, Denton County Public Health - Healthy Communities Coalition, Denton Hunger Coalition, Serve Denton, Texas Homeless CoC Board, United Way Funding Panels, City’s Interdepartmental Homeless Team, Denton County Behavioral Health Leadership Team, Denton County Homeless Leadership Team, Denton County Homeless Coalition and other short-term collaborations.

**Public Comment Period**

The public comment period is provided after the implementation of the citizen participation process as listed above. For the public comment period, Community Development posts drafts of the Con Plan Sections on the City webpage and promotes through outreach efforts.

- A draft of the Consolidated Plan for FY2020-2022 and the Annual Plan for FY2020 was placed on public display2 for 30 days beginning June 1, 2020.
  - Posted draft plans electronically on the City’s website.
  - Information on how to request printed copies was noted in the final hearing legal advertisement.
• Solicited comments through email newsletter from interested social service agencies, neighborhood associations, local churches, committee members, participating loan officers and real estate agents, and Community Development clients.
• Notices of public meetings and hearings were published in the local newspaper (ATTACHMENT 3), the City’s email newsletter and through the City’s social media channels.
• Conducted a final public hearing on June 16, 2020 to obtain final comments on the proposed Consolidated Plan for FY 2020-2022 the proposed use of funds for FY20 Action Plan.
## Citizen Participation Outreach

<table>
<thead>
<tr>
<th>Sort Order</th>
<th>Mode of Outreach</th>
<th>Target of Outreach</th>
<th>Summary of response/ attendance</th>
<th>Summary of comments received</th>
<th>Summary of comments not accepted and reasons</th>
<th>URL (If applicable)</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>Newspaper Ads</td>
<td>Residents of the City of Denton including low and moderate-income, various races and ethnicities, non-English speaking – specify other language: Spanish, residents in assisted housing, local non-profit service providers.</td>
<td>Requested Public Comment by Phone, Email, Online Survey, or Hearing/Meeting.</td>
<td>Included with 2, 3, and 4 below as applicable.</td>
<td>N/A</td>
<td>Ad Run Dates: March 31, 2020 Att. 3</td>
</tr>
<tr>
<td>2</td>
<td>Public Hearings (2)</td>
<td>Same as above.</td>
<td>No residents attended.</td>
<td>No comments received.</td>
<td>N/A</td>
<td>June 16, 2020</td>
</tr>
<tr>
<td>3</td>
<td>Neighborhood Meetings (2)</td>
<td>Residents of the two low- and moderate-income neighborhoods.</td>
<td>18 residents attended. Residents were provide print survey and links to online survey.</td>
<td>Add See also: Survey information.</td>
<td>N/A</td>
<td>SEDNA Civic Center in Quakertown Park</td>
</tr>
<tr>
<td>4</td>
<td>Survey - Print/Online</td>
<td>All city residents and organizations.</td>
<td>170 surveys were completed.</td>
<td>See the Executive Summary, ES-05 (#5, p.4) for a summary of the comments. Attachment 3</td>
<td>N/A</td>
<td>Att. #3</td>
</tr>
</tbody>
</table>
### Citizen Participation Outreach

<table>
<thead>
<tr>
<th>Sort Order</th>
<th>Mode of Outreach</th>
<th>Target of Outreach</th>
<th>Summary of response/attendance</th>
<th>Summary of comments received</th>
<th>Summary of comments not accepted and reasons</th>
<th>URL (If applicable)</th>
</tr>
</thead>
<tbody>
<tr>
<td>5</td>
<td>Community Development Newsletter (# Times)</td>
<td>Service providers, residents in low/mod areas, Neighborhood Associations and local churches.</td>
<td>Residents were requested to complete surveys.</td>
<td>Included with Sort Order 2, 3, and 4 above as applicable.</td>
<td>N/A</td>
<td>Dates Image/PDF Emailed on June 1 and 24, 2020 Att.3</td>
</tr>
<tr>
<td>6</td>
<td>Social Media</td>
<td>All city residents and organizations.</td>
<td>Residents were requested to complete surveys.</td>
<td>Included with Sort Order 2, 3, and 4 above as applicable.</td>
<td>N/A</td>
<td>Posting on June 3, 16, and 24, 2020 on Facebook, Twitter and Nextdoor Att. 3</td>
</tr>
<tr>
<td>7</td>
<td>Denton Television</td>
<td>All city residents</td>
<td>50 views Aired 330 times</td>
<td>Included with Sort Order 2, 3, and 4 above as applicable.</td>
<td>N/A</td>
<td><a href="https://youtu.be/Frp7FjIn3I">https://youtu.be/Frp7FjIn3I</a></td>
</tr>
</tbody>
</table>

Table 4 – Citizen Participation Outreach

2COVID-19 NOTE: The 2020-2022 Con Plan was not posted as described in the CPP which also requires posting in City public facilities but the CPP is amended for public comment posting requirements as allowed by HUD under the Coronavirus Aid, Relief and Economic Security Act (CARES Act) (Public Law 116-136) due to the closures of City and public facilities under State, County and City Stay at Home Orders.
[Page Left Intentionally Blank]
2020-2022 CONSOLIDATED PLAN & 2020 ACTION PLAN
... for housing and community development

NEEDS ASSESSMENT

EXPECTED 3-YEAR FUNDING AMOUNT 2020-2022

- Affordable Housing
- No Hunger
- Good Health and Well-being
- Family Stability
- Special Needs
- Making Homelessness Rare, Brief, and Nonrecurring
- Transportation Access
- Economic Security

STRATEGIC & ACTION PLAN PRIORITIES

<table>
<thead>
<tr>
<th>HOUSEHOLDS</th>
<th>PRIORITY</th>
</tr>
</thead>
<tbody>
<tr>
<td>123</td>
<td>AFFORDABLE HOUSING</td>
</tr>
<tr>
<td>7,560</td>
<td>MAKING HOMELESSNESS</td>
</tr>
<tr>
<td>4,500</td>
<td>RARE, BRIEF, &amp; NONRECURRING</td>
</tr>
<tr>
<td>24,000</td>
<td>PUBLIC SERVICES</td>
</tr>
<tr>
<td></td>
<td>PUBLIC FACILITIES, IMPROVEMENTS</td>
</tr>
<tr>
<td></td>
<td>&amp; INFRASTRUCTURE</td>
</tr>
<tr>
<td></td>
<td>PLANNING &amp; ADMINISTRATION</td>
</tr>
</tbody>
</table>

A REPORT FOR THE U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT
Community Development Block Grant (CDBG) Program
HOME Investment Partnerships (HOME)
Needs Assessment

**NA-05 Overview**

Needs Assessment Overview
Several factors are used to assess community needs. This section of the Consolidated Plan includes information on the following:

- **NA-10 Housing Needs Assessment**
  - **NA-15** Disproportionately Greater Need: Housing Problems
  - **NA-20** Disproportionately Greater Need: Severe Housing Problems
  - **NA-25** Disproportionately Greater Need: Housing Cost Burdens
  - **NA-30** Disproportionately Greater Need: Discussion
  - **NA-35** Public Housing

- **NA-40 Homeless Needs Assessment**
- **NA-45 Non-Homeless Special Needs Assessment**
- **NA-50 Non-Housing Community Development Needs**

HUD has provided “special tabulation” data from the U.S. Census Bureau’s American Community Survey (ACS) as part of its Comprehensive Housing Affordability Strategy (CHAS) materials to assist in preparing the Consolidated Plan and implementing HUD programs. Based on HUD-provided figures, the following data indicates the number and percentage of renters and homeowners who may be subject to housing problems based on income level.

HUD established five income categories for its analysis of incomes. The five income ranges are:

- Extremely Low (0-30% AMI);
- Very Low-income (31-50% AMI);
- Low-income (51-80% AMI);
- Moderate-income (81-100% AMI); and
- Upper-income (100% and above AMI)

The City of Denton faces complex housing needs. Using recent CHAS data from 2011 to 2015 provided by HUD the following was found:

- 19.03% of all households (8,325) are extremely low-income (0-30% AMI)
- 50.5% of all households (22,094) have incomes ranging from 0% to 80% AMI
- Approximately 19.05% of all households are severely cost burdened (paying more than 50% for housing) with renters experiencing cost burdened (paying more than 30% for housing) at a significantly higher rate than homeowners. To compare, 6,959 (83.5%) renter households pay over 50% of their income for rent compared to 1,375 (16.5%) homeowners who pay half or more of their income towards housing costs.
Assessing the specific housing needs of Denton is critical to creating a realistic and responsive affordable housing strategy. As such, an assessment of the affordable rental and single-family homes was conducted based on available demographic, economic, and housing data for the City. The assessment utilized HUD’s eCon Planning Suite within the Integrated Disbursement and Information System (IDIS). The eCon Planning Suite pre-populates the most up-to-date housing and economic data available to assist jurisdictions in identifying funding priorities in the Consolidated Plan and Annual Action Plan. Highlights of the assessment are provided in the sections below.
NA-10 Housing Needs Assessment - 24 CFR 91.205 (a,b,c)

<table>
<thead>
<tr>
<th>Demographics</th>
<th>Base Year: 2009</th>
<th>Most Recent Year: 2015</th>
<th>% Change</th>
</tr>
</thead>
<tbody>
<tr>
<td>Population</td>
<td>113,383</td>
<td>125,740</td>
<td>11%</td>
</tr>
<tr>
<td>Households</td>
<td>36,926</td>
<td>43,740</td>
<td>18%</td>
</tr>
<tr>
<td>Median Income</td>
<td>$47,297.00</td>
<td>$49,100.00</td>
<td>4%</td>
</tr>
</tbody>
</table>

Table 1 - Housing Needs Assessment Demographics

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

<table>
<thead>
<tr>
<th>Number of Households Table</th>
<th>0-30% HAMFI</th>
<th>&gt;30-50% HAMFI</th>
<th>&gt;50-80% HAMFI</th>
<th>&gt;80-100% HAMFI</th>
<th>&gt;100% HAMFI</th>
</tr>
</thead>
<tbody>
<tr>
<td>Total Households</td>
<td>8,325</td>
<td>5,944</td>
<td>7,825</td>
<td>4,375</td>
<td>17,280</td>
</tr>
<tr>
<td>Small Family Households</td>
<td>1,940</td>
<td>2,204</td>
<td>2,689</td>
<td>1,905</td>
<td>8,865</td>
</tr>
<tr>
<td>Large Family Households</td>
<td>340</td>
<td>440</td>
<td>599</td>
<td>529</td>
<td>1,610</td>
</tr>
<tr>
<td>Household contains at least one-person 62-74 years of age</td>
<td>675</td>
<td>724</td>
<td>1,495</td>
<td>670</td>
<td>3,589</td>
</tr>
<tr>
<td>Household contains at least one-person age 75 or older</td>
<td>490</td>
<td>395</td>
<td>544</td>
<td>370</td>
<td>1,199</td>
</tr>
<tr>
<td>Households with one or more children 6 years old or younger</td>
<td>940</td>
<td>1,110</td>
<td>1,314</td>
<td>804</td>
<td>2,284</td>
</tr>
</tbody>
</table>

Table 2 - Total Households Table

Data Source: 2011-2015 CHAS

Housing Needs Summary Tables

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

<table>
<thead>
<tr>
<th>NUMBER OF HOUSEHOLDS</th>
<th>Renter</th>
<th>Owner</th>
<th>Renter</th>
<th>Owner</th>
<th>Renter</th>
<th>Owner</th>
<th>Renter</th>
<th>Owner</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>0-30% AMI</td>
<td>&gt;30-50% AMI</td>
<td>&gt;50-80% AMI</td>
<td>&gt;80-100% AMI</td>
<td>Total</td>
<td>0-30% AMI</td>
<td>&gt;30-50% AMI</td>
<td>&gt;50-80% AMI</td>
</tr>
<tr>
<td>Substandard Housing - Lacking complete plumbing or kitchen facilities</td>
<td>160</td>
<td>60</td>
<td>80</td>
<td>15</td>
<td>315</td>
<td>0</td>
<td>15</td>
<td>75</td>
</tr>
<tr>
<td>Severely Overcrowded - With &gt;1.51 people per room (and complete kitchen and plumbing)</td>
<td>115</td>
<td>20</td>
<td>70</td>
<td>40</td>
<td>245</td>
<td>15</td>
<td>45</td>
<td>0</td>
</tr>
<tr>
<td>Overcrowded - With 1.01-1.5 people per room (and none of the above problems)</td>
<td>190</td>
<td>100</td>
<td>165</td>
<td>100</td>
<td>555</td>
<td>0</td>
<td>105</td>
<td>0</td>
</tr>
</tbody>
</table>
### Housing cost burden greater than 50% of income (and none of the above problems)

<table>
<thead>
<tr>
<th>AMI</th>
<th>Renter</th>
<th></th>
<th>Owner</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>0‐30%</td>
<td>5,345</td>
<td>1,179</td>
<td>120</td>
<td>15</td>
</tr>
</tbody>
</table>

### Housing cost burden greater than 30% of income (and none of the above problems)

<table>
<thead>
<tr>
<th>AMI</th>
<th>Renter</th>
<th></th>
<th>Owner</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>0‐30%</td>
<td>320</td>
<td>2,455</td>
<td>1,695</td>
<td>190</td>
</tr>
</tbody>
</table>

### Zero/negative Income (and none of the above problems)

<table>
<thead>
<tr>
<th></th>
<th>Renter</th>
<th></th>
<th>Owner</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>0‐30%</td>
<td>800</td>
<td>0</td>
<td>0</td>
<td>0</td>
</tr>
</tbody>
</table>

**Table 3 – Housing Problems Table**

**Data Source:** 2011-2015 CHAS

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

### NUMBER OF HOUSEHOLDS

<table>
<thead>
<tr>
<th></th>
<th>Renter</th>
<th></th>
<th>Owner</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>0-30%</td>
<td>5,810</td>
<td>1,359</td>
<td>435</td>
<td>170</td>
</tr>
</tbody>
</table>

### Having 1 or more of four housing problems

<table>
<thead>
<tr>
<th></th>
<th>Renter</th>
<th></th>
<th>Owner</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>0-30%</td>
<td>520</td>
<td>2,875</td>
<td>4,530</td>
<td>2,140</td>
</tr>
</tbody>
</table>

### Having none of four housing problems

<table>
<thead>
<tr>
<th></th>
<th>Renter</th>
<th></th>
<th>Owner</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>0-30%</td>
<td>800</td>
<td>0</td>
<td>0</td>
<td>0</td>
</tr>
</tbody>
</table>

**Table 4 – Housing Problems 2**

**Data Source:** 2011-2015 CHAS

3. Cost Burden > 30%

### NUMBER OF HOUSEHOLDS

<table>
<thead>
<tr>
<th></th>
<th>Renter</th>
<th></th>
<th>Owner</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>0-30%</td>
<td>Small Related</td>
<td>1,335</td>
<td>1,359</td>
<td>490</td>
</tr>
</tbody>
</table>
### Table 5 – Cost Burden > 30%

<table>
<thead>
<tr>
<th></th>
<th>Renter</th>
<th>Owner</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>0-30% AMI</td>
<td>&gt;30-50% AMI</td>
</tr>
<tr>
<td>Large Related</td>
<td>290</td>
<td>85</td>
</tr>
<tr>
<td>Elderly</td>
<td>515</td>
<td>305</td>
</tr>
<tr>
<td>Other</td>
<td>3,915</td>
<td>2,005</td>
</tr>
<tr>
<td>Total (income)</td>
<td>6,055</td>
<td>3,754</td>
</tr>
</tbody>
</table>

**Data Source:** 2011-2015 CHAS

### Table 6 – Cost Burden > 50%

<table>
<thead>
<tr>
<th></th>
<th>Renter</th>
<th>Owner</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>0-30% AMI</td>
<td>&gt;30-50% AMI</td>
</tr>
<tr>
<td>Small Related</td>
<td>1,190</td>
<td>324</td>
</tr>
<tr>
<td>Large Related</td>
<td>215</td>
<td>15</td>
</tr>
<tr>
<td>Elderly</td>
<td>450</td>
<td>150</td>
</tr>
<tr>
<td>Other</td>
<td>3,760</td>
<td>735</td>
</tr>
<tr>
<td>Total (income)</td>
<td>5,615</td>
<td>1,224</td>
</tr>
</tbody>
</table>

**Data Source:** 2011-2015 CHAS

### Table 7 – Crowding Information – 1.5

<table>
<thead>
<tr>
<th></th>
<th>Renter</th>
<th>Owner</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>0-30% AMI</td>
<td>&gt;30-50% AMI</td>
</tr>
<tr>
<td>Single family households</td>
<td>195</td>
<td>110</td>
</tr>
<tr>
<td>Multiple, unrelated family households</td>
<td>75</td>
<td>0</td>
</tr>
<tr>
<td>Other, non-family households</td>
<td>40</td>
<td>15</td>
</tr>
<tr>
<td>Total need by income</td>
<td>310</td>
<td>125</td>
</tr>
</tbody>
</table>

**Data Source:** 2011-2015 CHAS
Describe the number and type of single person households in need of housing assistance.

According to the American Community Survey 2018 (DP02), there are 19,561 nonfamily (single person) households. Using all household data, there are 26.7% of renter and 7.4% of homeowner households that are cost burdened and 15.9% of renters and 3.1% of homeowners that are severely cost burdened. Therefore, of single person households (Table 9, 10):

- 5,223 single person renters and 1,448 single person homeowners are cost burdened; and
- 3,110 single person renters and 606 single person homeowners are severely cost burdened.

Approximately 10,387 single person households may require housing stability assistance programs such as rental assistance, affordable housing, and income assistance programs.

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

The estimate number of disabled persons is 13,081 which is approximately 10% of the population (American Community Survey 2018 (DP02)) in Denton. The most common disabilities are ambulatory difficulties at 28.4% and difficulty with independent living at 21.8%. Ambulatory difficulties are higher among the population of 18-64 years at 52.1% and among the 65 years or older population at 46.7%.

Denton County Friends of the Family, a non-profit organization that assists victims of domestic violence, received 2,972 calls on the Crisis Hotline from community members in 2018 and assisted 4,139 adults and children across the entire agency. As of April, 2020, there are eight (8) households and six (6) individuals experiencing homelessness because of domestic violence (United Way of Denton County Homelessness Data Dashboard). With a population increase projected for Denton, it is possible that domestic violence incidents will continue to rise. Therefore, it is important that the City of Denton continue to support housing projects for victims of domestic violence.
What are the most common housing problems?

Based on CHAS data (Table 8), it is evident that thousands of households including 7,774 renters and 1,700 homeowners in the City have moderate to severe housing problems. This is not surprising given the fact that 26,474 or 61.1% of all households have at least one housing problem and 50.5% households in Denton are also low and moderate income.

By far, cost burdened is the most common housing problem in Denton, affecting 23,242 low and moderate-income households (Table 9, 10). This effects renter households significantly. They make up 80.2% of all cost burdened and severely cost burdened households.

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

Housing cost burden (Table 9, 10) is particularly serious for the extremely low-income households (households earning between 0% and 30% HAMFI) because over 75.5% of these households spend more than 50% of their gross income on housing. These households are extremely vulnerable to having a financial or personal crisis that puts the household at risk of homelessness. Housing cost burden is also more serious for renters. Renters make up 80.2% of all cost burdened and severely cost burdened households. The data indicate that cost burden is more serious for low and moderate-income renters.

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

Individuals and families with children who are extremely low-income typically have a combination of financial factors present in their lives: low-wage employment, rent that costs more than 30% or more than 50% of their total income, childcare costs, medical bills, and higher transportation expenses. If these families experience a sudden crisis, typically they do not have financial resources and may be at risk of homelessness as a result. In addition, households may face a variety of other complex issues: family conflicts, domestic violence, overcrowded housing, family members with disabilities, criminal record, behavioral health issues, and prior experience with homelessness resulting in an increased risk of homelessness.

Rapid Re-Housing (RRH) is a permanent housing solution offered in Denton and throughout Denton County. It provides relocation and stabilization services and assistance necessary to help an individual or family experiencing homelessness move as quickly as possible into permanent housing and achieve stability in that housing. Because those who receive RRH assistance have
already experienced homelessness, they have a higher risk of returning to homelessness. As a result, high performing RRH program include ongoing case management with wrap-around services and evaluation of housing stability needs before financial assistance is terminated.

If a jurisdiction provides estimates of the at-risk population(s), it should also include a description of the operational definition of the at-risk group and the methodology used to generate the estimates:

As defined locally, a person who is literally on the street, staying in an emergency shelter, or living in a place not fit for human habitation is considered homeless. A person is at-risk of homelessness if they are about to be evicted from a current place of habitation. The methodology used to determine needs of identified groups is based on a review of local Homeless Management Information System (HMIS) data, annual Point-In-Time Count data, School District data on students experiencing homelessness, Coordinated Entry (CE), Denton County Homelessness Leadership Team’s analysis of strengths and gaps, and grant performance reports from community public services funding for diversion and homelessness prevention activities. The information in Table 8, 9, and 10 above also provides estimates on at-risk households who are experiencing housing problems or are cost burdened.

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

Lack of affordable housing and limited financial resources to maintain habitable housing, especially among extremely low- and very low-income renters and homeowners, is the principal risk linked to housing instability in Denton. For cost burdened households, poor housing maintenance can result in housing violations or findings of inhabitable living conditions affecting disabled and elderly homeowner and renters who do not have the financial resources to maintain their homes because of fixed or limited incomes. Cost burdened households whose housing expenses exceed income leads to housing instability and an increased risk of homelessness.

Discussion

A lack of safe, stable affordable housing is the most pressing housing issue in most communities including Denton. The housing assessment overall shows that cost burden households paying more that 30% or 50% of income on housing is the most common of the four housing problems especially for households who are renters (80.2% of all households). The City prioritizes national best practices and proven local strategies for the creation and preservation of affordable housing, rent assistance, housing repair assistance and assistance to people experiencing homelessness as informed by the planning and available resources.
NA-15 Disproportionately Greater Need: Housing Problems – 91.205 (b)(2)
Assess the need of any racial or ethnic group that has disproportionately greater need in comparison to the needs of that category of need as a whole.

Introduction
According to HUD’s eCon Planning Suite, a disproportionately greater need exists when the members of a racial or ethnic group at an income level experience a housing problem at a greater rate (10% or more) than the income level as a whole. The tables and analyses below identify the share of households by race/ethnicity and income level experiencing one or more of the four housing problems outlined by HUD guidelines. The four housing problems are:

1. Housing unit lacks complete kitchen facilities: A complete kitchen consists of a sink with a faucet, a stove or range, and a refrigerator. (Substandard Housing)
2. Housing unit complete plumbing facilities: Complete plumbing consists of hot and cold running water, a flush toilet, and a bathtub or shower. (Substandard Housing)
3. Overcrowded households with more than one person per room. (Overcrowded)
4. Household costs: household pays more than 30 percent of income for housing costs. (Cost Burdened)

The following will provide an assessment on the disproportionate housing need in Denton based on race and ethnicity based on the data available through HUD’s eCon Planning Suite.

0%-30% of Area Median Income

<table>
<thead>
<tr>
<th></th>
<th>Has one or more of four housing problems</th>
<th>Has none of the four housing problems</th>
<th>Household has no/negative income, but none of the other housing problems</th>
</tr>
</thead>
<tbody>
<tr>
<td>Jurisdiction as a whole</td>
<td>7,145</td>
<td>315</td>
<td>865</td>
</tr>
<tr>
<td>White</td>
<td>3,775</td>
<td>170</td>
<td>405</td>
</tr>
<tr>
<td>Black / African American</td>
<td>1,055</td>
<td>40</td>
<td>140</td>
</tr>
<tr>
<td>Asian</td>
<td>470</td>
<td>15</td>
<td>230</td>
</tr>
<tr>
<td>American Indian, Alaska Native</td>
<td>10</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td>Pacific Islander</td>
<td>0</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td>Hispanic</td>
<td>1,555</td>
<td>60</td>
<td>60</td>
</tr>
</tbody>
</table>

Table 8 - Disproportionally Greater Need 0 - 30% AMI

Data Source: 2011-2015 CHAS

*The four housing problems are:
1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than one person per room, 4. Cost Burden greater than 30%
### 30%-50% of Area Median Income

<table>
<thead>
<tr>
<th>Housing Problems</th>
<th>Has one or more of four housing problems</th>
<th>Has none of the four housing problems</th>
<th>Household has no/negative income, but none of the other housing problems</th>
</tr>
</thead>
<tbody>
<tr>
<td>Jurisdiction as a whole</td>
<td>4,814</td>
<td>1,134</td>
<td>0</td>
</tr>
<tr>
<td>White</td>
<td>2,779</td>
<td>644</td>
<td>0</td>
</tr>
<tr>
<td>Black / African American</td>
<td>575</td>
<td>115</td>
<td>0</td>
</tr>
<tr>
<td>Asian</td>
<td>154</td>
<td>15</td>
<td>0</td>
</tr>
<tr>
<td>American Indian, Alaska Native</td>
<td>25</td>
<td>20</td>
<td>0</td>
</tr>
<tr>
<td>Pacific Islander</td>
<td>50</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td>Hispanic</td>
<td>1,130</td>
<td>300</td>
<td>0</td>
</tr>
</tbody>
</table>

Table 9 - Disproportionally Greater Need 30 - 50% AMI

*The four housing problems are:
1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than one person per room, 4. Cost Burden greater than 30%

### 50%-80% of Area Median Income

<table>
<thead>
<tr>
<th>Housing Problems</th>
<th>Has one or more of four housing problems</th>
<th>Has none of the four housing problems</th>
<th>Household has no/negative income, but none of the other housing problems</th>
</tr>
</thead>
<tbody>
<tr>
<td>Jurisdiction as a whole</td>
<td>3,505</td>
<td>4,319</td>
<td>0</td>
</tr>
<tr>
<td>White</td>
<td>2,085</td>
<td>2,619</td>
<td>0</td>
</tr>
<tr>
<td>Black / African American</td>
<td>475</td>
<td>334</td>
<td>0</td>
</tr>
<tr>
<td>Asian</td>
<td>90</td>
<td>110</td>
<td>0</td>
</tr>
<tr>
<td>American Indian, Alaska Native</td>
<td>30</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td>Pacific Islander</td>
<td>0</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td>Hispanic</td>
<td>780</td>
<td>1,165</td>
<td>0</td>
</tr>
</tbody>
</table>

Table 10 - Disproportionally Greater Need 50 - 80% AMI

*The four housing problems are:
1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than one person per room, 4. Cost Burden greater than 30%
**80%-100% of Area Median Income**

<table>
<thead>
<tr>
<th>Housing Problems</th>
<th>Has one or more of four housing problems</th>
<th>Has none of the four housing problems</th>
<th>Household has no/negative income, but none of the other housing problems</th>
</tr>
</thead>
<tbody>
<tr>
<td>Jurisdiction as a whole</td>
<td>900</td>
<td>3,470</td>
<td>0</td>
</tr>
<tr>
<td>White</td>
<td>605</td>
<td>2,335</td>
<td>0</td>
</tr>
<tr>
<td>Black / African American</td>
<td>65</td>
<td>340</td>
<td>0</td>
</tr>
<tr>
<td>Asian</td>
<td>35</td>
<td>60</td>
<td>0</td>
</tr>
<tr>
<td>American Indian, Alaska Native</td>
<td>4</td>
<td>20</td>
<td>0</td>
</tr>
<tr>
<td>Pacific Islander</td>
<td>0</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td>Hispanic</td>
<td>194</td>
<td>680</td>
<td>0</td>
</tr>
</tbody>
</table>

**Table 11 - Disproportionally Greater Need 80 - 100% AMI**

*Data Source: 2011-2015 CHAS*

*The four housing problems are:
1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than one person per room, 4. Cost Burden greater than 30%

**Discussion**

There is a strong connection with housing problems and household income in Denton.

**Table 13:**

At 0%-30% of AMI, 85.8% of the jurisdiction as a whole has 1 or more of 4 housing problems. Those racial or ethnic groups earning 0%-30% of AMI who are experiencing a housing problem at a greater rate (10% or more) than the income level as a whole include:

- 3,775/8,325 (45.35%) White
- 1,055/8,325 (12.67%) Black / African American
- 1,555/8,325 (18.68%) Hispanic

**Table 14:**

At 31%-50% of AMI, 80.9% of the jurisdiction as a whole has 1 or more of 4 housing problems. Those racial or ethnic groups earning 31%-50% of AMI who are experiencing a housing problem at a greater rate (10% or more) than the income level as a whole include:

- 2,779/5,948 (46.72%) White
- 1,130/5,948 (19.00%) Hispanic

As income increases, there are lower rates of households experiencing one or more of four housing problems. The rate drops from 85.8% to 80.9%
Table 15:
At 51%-80% of AMI, 44.8% of the jurisdiction as a whole has 1 or more of 4 housing problems. Those racial or ethnic groups earning 51%-80% of AMI who are experiencing a housing problem at a greater rate (10% or more) than the income level as a whole include:
- 2,085/7,824 (26.65%) White

Once again as income increases, there are lower rates of households experiencing one or more of four housing problems. The rate drops nearly in half from 80.9% to 44.8%

Table 16:
At 81%-100% of AMI, 20.6% of the jurisdiction as a whole has 1 or more of 4 housing problems. Those racial or ethnic groups earning 81%-100% of AMI who are experiencing a housing problem at a greater rate (10% or more) than the income level as a whole include:
- 605/4,370 (13.84%) White

Consistently, as income increases there are lower rates of households experiencing one or more of four housing problems. The rate drops nearly in half again from 44.8% to 20.6%
NA-20 Disproportionately Greater Need: Severe Housing Problems – 91.205 (b)(2)

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

Introduction
According to HUD’s eCon Planning Suite, a disproportionately greater need exists when the members of a racial or ethnic group at an income level experience a housing problem at a greater rate (10% or more) than the income level as a whole. The tables and analyses below identify the share of households by race/ethnicity and income level experiencing one or more of the four housing problems outlined by HUD guidelines. Severe housing problems include:

- Housing unit lacks complete kitchen facilities: A complete kitchen consists of a sink with a faucet, a stove or range, and a refrigerator. (Substandard Housing)
- Housing unit complete plumbing facilities: Complete plumbing consists of hot and cold running water, a flush toilet, and a bathtub or shower. (Substandard Housing)
- Overcrowded households with more than 1.5 persons per room, not including bathrooms, porches, foyers, halls, or half-rooms. (Overcrowded)
- Households with severe cost burdens pays more than 50 percent of income on housing costs. (Severe Cost Burdened)

0%-30% of Area Median Income

<table>
<thead>
<tr>
<th>Severe Housing Problems</th>
<th>Has one or more of four housing problems</th>
<th>Has none of the four housing problems</th>
<th>Household has no/negative income, but none of the other housing problems</th>
</tr>
</thead>
<tbody>
<tr>
<td>Jurisdiction as a whole</td>
<td>6,505</td>
<td>960</td>
<td>865</td>
</tr>
<tr>
<td>White</td>
<td>3,450</td>
<td>495</td>
<td>405</td>
</tr>
<tr>
<td>Black / African American</td>
<td>1,005</td>
<td>95</td>
<td>140</td>
</tr>
<tr>
<td>Asian</td>
<td>410</td>
<td>75</td>
<td>230</td>
</tr>
<tr>
<td>American Indian, Alaska Native</td>
<td>10</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td>Pacific Islander</td>
<td>0</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td>Hispanic</td>
<td>1,415</td>
<td>205</td>
<td>60</td>
</tr>
</tbody>
</table>

Table 17 – Severe Housing Problems 0 - 30% AMI

Data Source: 2011-2015 CHAS

*The four severe housing problems are:
1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than 1.5 persons per room, 4. Cost Burden over 50%
### 30%-50% of Area Median Income

<table>
<thead>
<tr>
<th>Severe Housing Problems*</th>
<th>Has one or more of four housing problems</th>
<th>Has none of the four housing problems</th>
<th>Household has no/negative income, but none of the other housing problems</th>
</tr>
</thead>
<tbody>
<tr>
<td>Jurisdiction as a whole</td>
<td>1,924</td>
<td>4,025</td>
<td>0</td>
</tr>
<tr>
<td>White</td>
<td>1,199</td>
<td>2,225</td>
<td>0</td>
</tr>
<tr>
<td>Black / African American</td>
<td>235</td>
<td>455</td>
<td>0</td>
</tr>
<tr>
<td>Asian</td>
<td>89</td>
<td>80</td>
<td>0</td>
</tr>
<tr>
<td>American Indian, Alaska Native</td>
<td>0</td>
<td>45</td>
<td>0</td>
</tr>
<tr>
<td>Pacific Islander</td>
<td>0</td>
<td>50</td>
<td>0</td>
</tr>
<tr>
<td>Hispanic</td>
<td>385</td>
<td>1,040</td>
<td>0</td>
</tr>
</tbody>
</table>

Table 12 – Severe Housing Problems 30 - 50% AMI

*Data Source: 2011-2015 CHAS

*The four severe housing problems are:
1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than 1.5 persons per room, 4. Cost Burden over 50%

### 50%-80% of Area Median Income

<table>
<thead>
<tr>
<th>Severe Housing Problems*</th>
<th>Has one or more of four housing problems</th>
<th>Has none of the four housing problems</th>
<th>Household has no/negative income, but none of the other housing problems</th>
</tr>
</thead>
<tbody>
<tr>
<td>Jurisdiction as a whole</td>
<td>785</td>
<td>7,035</td>
<td>0</td>
</tr>
<tr>
<td>White</td>
<td>405</td>
<td>4,305</td>
<td>0</td>
</tr>
<tr>
<td>Black / African American</td>
<td>90</td>
<td>724</td>
<td>0</td>
</tr>
<tr>
<td>Asian</td>
<td>20</td>
<td>185</td>
<td>0</td>
</tr>
<tr>
<td>American Indian, Alaska Native</td>
<td>30</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td>Pacific Islander</td>
<td>0</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td>Hispanic</td>
<td>220</td>
<td>1,725</td>
<td>0</td>
</tr>
</tbody>
</table>

Table 19 – Severe Housing Problems 50 - 80% AMI

*Data Source: 2011-2015 CHAS

*The four severe housing problems are:
1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than 1.5 persons per room, 4. Cost Burden over 50%
80%-100% of Area Median Income

<table>
<thead>
<tr>
<th>Severe Housing Problems*</th>
<th>Has one or more of four housing problems</th>
<th>Has none of the four housing problems</th>
<th>Household has no/negative income, but none of the other housing problems</th>
</tr>
</thead>
<tbody>
<tr>
<td>Jurisdiction as a whole</td>
<td>260</td>
<td>4,115</td>
<td>0</td>
</tr>
<tr>
<td>White</td>
<td>200</td>
<td>2,745</td>
<td>0</td>
</tr>
<tr>
<td>Black / African American</td>
<td>10</td>
<td>395</td>
<td>0</td>
</tr>
<tr>
<td>Asian</td>
<td>0</td>
<td>90</td>
<td>0</td>
</tr>
<tr>
<td>American Indian, Alaska Native</td>
<td>0</td>
<td>24</td>
<td>0</td>
</tr>
<tr>
<td>Pacific Islander</td>
<td>0</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td>Hispanic</td>
<td>55</td>
<td>819</td>
<td>0</td>
</tr>
</tbody>
</table>

Table 13 – Severe Housing Problems 80 - 100% AMI

Data Source: 2011-2015 CHAS

*The four severe housing problems are:
1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than 1.5 persons per room, 4. Cost Burden over 50%

Discussion
There is a strong connection with severe housing problems and household income in Denton. Some racial and ethnic groups make up a smaller portion of households and may have higher percentages than larger representative groups.

Table 17:
At 0%-30% of AMI, 78.1% of the jurisdiction as a whole has 1 or more of 4 severe housing problems. Those experiencing a housing problem at a greater rate (10% or more) than the income level as a whole:

- 3,450/8,330 (41.42%) White
- 1,005/8,330 (12.06%) Black / African American
- 1,415/8,330 (16.99%) Hispanic

As income increases, there are lower rates of households experiencing one or more of four severe housing problems. The rate drops more than half from 78.1% to 32.3%.

Table 18:
At 31%-50% of AMI, 32.3% of the jurisdiction as a whole has 1 or more of 4 severe housing problems. Those experiencing a housing problem at a greater rate (10% or more) than the income level as a whole:
- 1,199/5,949 (20.15%) White

**Table 19:**
At 51%-80% of AMI, 10% of the jurisdiction as a whole has 1 or more of 4 severe housing problems. Those experiencing a housing problem at a greater rate (10% or more) than the income level as a whole:
- No racial or ethnic group was disproportionally affected in this income category.

Once again, as income increases there are lower rates of households experiencing one or more of four severe housing problems. The rate drops more than half from 32.3% to 10%.

**Table 20:**
At 81%-100% of AMI, 5.9% of the jurisdiction as a whole has 1 or more of 4 severe housing problems. Those experiencing a housing problem at a greater rate (10% or more) than the income level as a whole:
- No racial or ethnic group was disproportionally affected in this income category.

Consistently, as income increases there are lower rates of households experiencing one or more of four severe housing problems. The rate drops more than half from 32.3% to 10%.
NA-25 Disproportionately Greater Need: Housing Cost Burdens – 91.205 (b)(2)

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

Introduction
Per HUD definitions, a “disproportionate need” exists when any group has a housing need that is 10% or higher than the jurisdiction as a whole. A household is considered cost burdened when they are paying more than 30% of their income towards housing costs, including utilities. This section analyzes the extent of cost burden and identifies populations that are disproportionately affected according to data available from HUD.

Housing Cost Burden

<table>
<thead>
<tr>
<th>Housing Cost Burden</th>
<th>Paying less than or equal to (&lt;=)30% of income on housing</th>
<th>Paying 30-50% of income on housing</th>
<th>Paying greater than (&gt;50% of income on housing</th>
<th>No / negative income (not computed)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Jurisdiction as a whole</td>
<td>26,153</td>
<td>8,175</td>
<td>8,494</td>
<td>915</td>
</tr>
<tr>
<td>White</td>
<td>19,359</td>
<td>4,950</td>
<td>4,949</td>
<td>415</td>
</tr>
<tr>
<td>Black / African American</td>
<td>1,639</td>
<td>935</td>
<td>1,200</td>
<td>140</td>
</tr>
<tr>
<td>Asian</td>
<td>545</td>
<td>260</td>
<td>430</td>
<td>255</td>
</tr>
<tr>
<td>American Indian, Alaska Native</td>
<td>100</td>
<td>29</td>
<td>25</td>
<td>0</td>
</tr>
<tr>
<td>Pacific Islander</td>
<td>10</td>
<td>50</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td>Hispanic</td>
<td>3,990</td>
<td>1,759</td>
<td>1,700</td>
<td>75</td>
</tr>
</tbody>
</table>

Table 14 – Greater Need: Housing Cost Burdens AMI

Data Source: 2011-2015 CHAS

Discussion
When viewing racial and ethnic figures and Housing Cost Burden (Table 21), there are 16,669 out of 43,737 total households in Denton that are cost burdened with 8,175 paying 30% - 50% of their total household income towards housing expenses and 8,494 severely cost burdened households paying over 50% of their household income on housing expenses. This represents that 18.7% of all households are paying 30% - 50% of their total household income towards housing expenses and 19.4% of all households are paying more than 50% of their total household income towards housing expenses.

Table 21:
- 30% - 50%: 4,950/43,737 (11.3%) White is the only racial or ethnic group that has a housing need that is 10% or higher than the jurisdiction as a whole
- (>50%: 4,949/43,737 (11.3%) White is the only racial or ethnic group that has a housing need that is 10% or higher than the jurisdiction as a whole
NA-30 Disproportionately Greater Need: Discussion – 91.205(b)(2)

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

The housing assessment overall shows that being cost burden paying more than 30% or 50% of income on housing was the most common of the four housing problems. In NA-10 through Table 9 and 10, the total number of households that are cost burdened is 23,242 (14,908, >30% and 8,334, >50%). That is 53.1% of all households (43,740). Of the 23,242 cost burdened households, approximately 18,638 (80%) households are renter households, compared to 4,604 homeowners. Cost burden households are the most pressing housing problem, especially at the lower income levels for renters.

Some racial and ethnic groups make up a smaller portion of households and may have higher percentages than larger representative groups. Some racial or ethnic groups are experiencing disproportionate greater need at the 0%-30% AMI, the 30%-50% AMI categories and cost-burdened households. Overall in at least one category each, White, Black/African American, and Hispanic households experience disproportionately greater needs than the needs of the income category as a whole especially people with incomes below 50% of AMI.

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

Needs identified in previous section.

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

According to the following CPD maps, there are census tracts in Denton that have a higher percentage of Hispanics, Black/African American, and Asian households. There is a concentration of Asians in the immediate area of the University of North Texas and neighborhoods surrounding the university. There is a concentration of Black/African American in Southeast Denton and in the immediate area of Texas Woman's University. Residents of Hispanics origin are concentrated in half of the neighborhoods in Denton, particularly in neighborhoods in South and East Denton and in newly annexed areas surrounding Denton.
Figure 1. Percentage of concentration of Hispanics, Black/African American, and Asian households

NA-35 Public Housing – 91.205(b)

Introduction
The Denton Housing Authority (DHA) was formed in 1970 to address the housing needs of low-income families in the city of Denton. DHA is a Section 8 only PHA, and does not manage any public housing units. The DHA currently administers 1,641 Housing Choice Vouchers (also referred to as Section 8 or HCV) and a Homeownership Program. DHA administers various public facility corporations to operate and manage other multi-family tax credit properties such as the Veranda and Renaissance Courts Townhomes, and Heritage Oaks and the Pecan Place Apartments which provides affordable housing for seniors.

Totals in Use

<table>
<thead>
<tr>
<th>Program Type</th>
<th>Certificate</th>
<th>Mod-Rehab</th>
<th>Public Housing</th>
<th>Vouchers</th>
<th>Total</th>
<th>Project-based</th>
<th>Tenant-based</th>
<th>Special Purpose Voucher</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>Veterans Affairs</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>Supportive Housing!</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>Family Unification</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>Program</td>
</tr>
<tr>
<td></td>
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<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>Disabled</td>
</tr>
<tr>
<td># of units/vouchers in use</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>1,341</td>
<td>0</td>
<td>1,341</td>
<td>25</td>
<td>1</td>
</tr>
</tbody>
</table>

Table 15 - Public Housing by Program Type

Data Source: PIC (PIH Information Center)

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

Characteristics of Residents

<table>
<thead>
<tr>
<th>Program Type</th>
<th>Certificate</th>
<th>Mod-Rehab</th>
<th>Public Housing</th>
<th>Vouchers</th>
<th>Total</th>
<th>Project-based</th>
<th>Tenant-based</th>
<th>Special Purpose Voucher</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>Veterans Affairs</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>Supportive Housing!</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>Family Unification</td>
</tr>
<tr>
<td></td>
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<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>Program</td>
</tr>
<tr>
<td>Average Annual Income</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>15,152</td>
<td>0</td>
<td>15,152</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td>Average length of stay</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>6.5</td>
<td>0</td>
<td>6.5</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td>Average Household size</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>2.4</td>
<td>0</td>
<td>2.4</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td># Homeless at admission</td>
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<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
</tr>
</tbody>
</table>
### Table 24 – Characteristics of Public Housing Residents by Program Type

<table>
<thead>
<tr>
<th>Program Type</th>
<th>Certificate</th>
<th>Mod-Rehab</th>
<th>Public Housing</th>
<th>Vouchers</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Total</td>
<td>Project-based</td>
<td>Tenant-based</td>
<td>Special Purpose Voucher</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td>Veterans Affairs Supportive Housing</td>
</tr>
<tr>
<td># of Elderly (&gt;62)</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>448</td>
</tr>
<tr>
<td># of Disabled Families</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>423</td>
</tr>
<tr>
<td># of Families requesting accessibility features</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td># of HIV/AIDS program participants</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td># of DV victims</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
</tr>
</tbody>
</table>

Data Source: PIC (PIH Information Center)

### Table 16 – Race of Public Housing Residents by Program Type

<table>
<thead>
<tr>
<th>Race</th>
<th>Certificate</th>
<th>Mod-Rehab</th>
<th>Public Housing</th>
<th>Vouchers</th>
<th>Special Purpose Voucher</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Total</td>
<td>Project-based</td>
<td>Tenant-based</td>
<td>Veterans Affairs Supportive Housing</td>
<td>Family Unification Program</td>
</tr>
<tr>
<td>White</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>629</td>
<td>0</td>
</tr>
<tr>
<td>Black/African American</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>791</td>
<td>0</td>
</tr>
<tr>
<td>Asian</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>27</td>
<td>0</td>
</tr>
<tr>
<td>American Indian/Alaska Native</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>4</td>
<td>0</td>
</tr>
<tr>
<td>Pacific Islander</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>5</td>
<td>0</td>
</tr>
<tr>
<td>Other</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
</tr>
</tbody>
</table>

Data Source: PIC (PIH Information Center)

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

<table>
<thead>
<tr>
<th>Ethnicity</th>
<th>Certificate</th>
<th>Mod-Rehab</th>
<th>Public Housing</th>
<th>Project-based</th>
<th>Tenant-based</th>
<th>Vouchers</th>
<th>Special Purpose Voucher</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td>Total</td>
<td></td>
<td></td>
<td>Veterans Affairs</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>Supportive Housing</td>
</tr>
<tr>
<td></td>
<td></td>
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<td></td>
<td></td>
<td></td>
<td>Family Unification</td>
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<td></td>
<td></td>
<td></td>
<td>Program</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>Disabled *</td>
</tr>
<tr>
<td>Hispanic</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>200</td>
<td>0</td>
<td>200</td>
<td>0</td>
</tr>
<tr>
<td>Not Hispanic</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>1,256</td>
<td>0</td>
<td>1,256</td>
<td>0</td>
</tr>
</tbody>
</table>

Table 17 – Ethnicity of Public Housing Residents by Program Type

*Data Source: PIC (PIH Information Center)*

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

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

According to DHA, two of the properties that DHA owns/manages for seniors indicate a need for additional wheelchair ramps, wider doors, etc. for mobility equipment and the wait-list does not track the need for accessible units. However, voucher holders do experience difficulties in locating accessible, affordable units.

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

According to DHA, the immediate need for HCV holders is affordable housing units to rent in higher opportunity areas, and closer to available jobs and high performing schools. HCV holders also experience problems with paying security deposits, application fees, and other administrative fees to potential property owners, which is required to apply for an available unit. A small survey completed by DHA in 2018 showed participants report difficulties in paying utilities (43%) and buying food (37%).

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

Once individuals and families retain a voucher, they should no longer be faced with one of the four housing problems defined by HUD. However, the needs related to low-income and other unique issues can still affect the population served by DHA, as these issues impact the population at large. Individuals and families applying for vouchers are predominately low-income or very low-income, earning below 50% of the AMI. Furthermore, the needs of those on the wait-list for vouchers are similar to the population at large in that the needs associated with economic barriers intensify the problem of affordable housing in the area.
Discussion

The demand for HCV in Denton continues to increase, as does the number of low and moderate-income residents. DHA has noticed an increase in the need for families earning between 31%-80% AMI. Many of these families are severely cost burdened, and may be sacrificing other necessities such as healthy food and health care to pay rent. Denton needs more affordable housing to meet this unmet community need. DHA has 2,042 applicants on the HCV waitlist and the list remains closed. This shows a clear need in the community for additional ways to subsidize rents for low-income families.
NA-40 Homeless Needs Assessment – 91.205(c)

Introduction
Homeless strategy is addressed on a regional basis in partnership with the Denton County Homelessness Leadership Team (DCHLT), the Texas Balance of State (BoS) Continuum of Care (CoC), The Texas Department of Housing and Community Affairs (TDHCA), and other coordination efforts with services provided by agencies located in Denton, Texas. The City’s strategic goal is aligned with the region to Make Homelessness Rare, Brief, and Nonrecurring.

The City of Denton is part of the BoS CoC, administered by the Texas Homeless Network (THN). THN is a non-profit membership organization that helps Texas communities prevent and end homelessness. THN is partially funded through the HUD Continuum of Care grant, TDHCA, and Texas Department of State Health and Services.

Data for an assessment of the needs of the homeless population for Denton is provided from the 2020 Point in Time (PIT) Count performed at the County level on January 23, 2020 and through HIMS data reported in the United Way of Denton County’s Homeless Data Dashboard. Both are supported by City staff and general fund grants.

The data reflects the total number of households experiencing literal homelessness in Denton County, and make up the Denton County Housing Priority List. The Housing Priority List (HPL) is a list of all households experiencing homelessness in Denton County that have completed a Coordinated Entry (CE) housing assessment. CE is the system and process that ensures people experiencing homelessness are quickly identified, assessed and referred to housing assistance and supportive services that promote housing stability. Denton County service providers use the HPL to quickly identify and prioritize households experiencing homelessness for limited housing assistance resources based on their level of need and special population status.

Actively Homeless Households are those currently seeking housing assistance whose whereabouts are known by Denton County Service Providers. Chronically Homeless households include at least one member living with a disability who has been homeless for 12 consecutive months or 4 times within the past 3 years (totaling 12 months).

The DCHLT has adopted System Performance Measures (SPMs) that allows the housing crisis response system to gauge their progress toward preventing and ending homelessness. Below are the seven metrics Denton County has identified to communicate systems level performance and help inform innovative solutions to make homelessness rare, brief and nonrecurring.
We are currently measuring three SPM’s with the goal to add measures for the remaining by 2021.

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

Data is available and provided in other sections of NA-40 and NA-45.
Figure 4. Denton County 2020 PIT Count Snapshot

DENTON COUNTY 2020 PIT COUNT SNAPSHOT

MORE COVERAGE THAN EVER BEFORE!

98 Volunteers 17 Cities/Towns

258 people experiencing homelessness
33% increase from 2019

59 sheltered

199 unsheltered

- 70% White
- 18.4% African American
- 2.8% Asian
- 1.2% American Indian
- 3.6% Multiple Races
- 4% Unknown

10% Unknown

30.8% Female

69.2% Male

- 83.5% Non-Hispanic
- 13% Hispanic/Latino
- 3.5% Unknown

18 VETERANS

2.5X more Veterans surveyed from 2019-2020

85.7% of people living with a serious mental illness are living unsheltered

28% FEWER unaccompanied youth (18-24 yrs) from 2019

9X MORE children experiencing homelessness from 2019

FULL REPORT RELEASED MAY 2020

OMB Control No: 2506-0117 (exp. 06/30/2018)
Estimate the number and type of families in need of housing assistance for families with children and the families of veterans.

Those in need of housing assistance include extremely low-income households with at least one severe housing problem, those who have limited or fixed incomes due to a special need, those who are sheltered but will leave shelter without a stable income to support independent living, and those living unsheltered or in place not fit for human habitation.

In the Point in Time Count (PIT), there was an increase in families with children but an overall decrease in homeless youth (18-24). According to the United Way of Denton County Homelessness Homeless Data Dashboard as of April 2020, there are twenty-seven (27) families and 309 individuals experiencing homelessness in Denton County. Of those, there are thirty (30) veterans experiencing homelessness and zero veteran households. The PIT Count identified eighteen (18) Veterans. Moreover, the City of Denton has signed on the Mayor’s Challenge to End Veteran Homelessness and the Denton County Homelessness Leadership Team (DCHLT), a Collective Impact initiative managed by the United Way of Denton County, has adopted the goal to end veteran homelessness by the end of 2020. The commitment to end veteran homelessness is a call to action for the entire community, a coordinated effort between leaders from across the public, private and non-profit sectors. Denton County service providers continue to work tirelessly to collaborate and implement Coordinated Entry to better identity people experiencing homelessness. This data reflects a manageable number of veteran households experiencing homelessness in Denton County, a number the community can work together to bring to functional zero by the end of 2020.


The 2020 annual PIT count collected information by Racial and Ethnic groups. Out of 258 individuals surveyed in Denton County, 70% were White, 18.4% were Black or African American, 13% were Hispanic/Latino, 2.8% were Asian, and 1.2% were American Indian or Alaskan Native.

Describe the Nature and Extent of Unsheltered and Sheltered Homelessness.

Approximately 22% (59) of those counted in annual Point-In-Time Count were sheltered in emergency shelters, and other non-permanent sources of housing. More than 77% (199) were counted unsheltered with 87% are living with a serious mental illness. Between March 2019 to April 2020, 155 households were housed.

Discussion

The data indicate the following needs to support persons experiencing or at-risk of homelessness:
- Increase Street Outreach efforts to connect with people experiencing homelessness living unsheltered;
- Increase funding for Diversion (rapid resolution for diverting people from homelessness quickly);
- Increase funding for Rapid Re-Housing for families and individuals including housing location and stabilization resources;
- Increase the number of short-term supportive and long-term permanent affordable housing units for both individuals and families with children;
- Increase specialized housing for those in Permanent Supportive Housing for those with prioritized special needs;
- Build relationships between service providers and landlords to increase access to independent living housing options for people with barriers to housing such as income below landlord requirements, past evictions, criminal convictions, poor credit history, etc.
Introduction
The City of Denton partners with local non-profit organizations to provide services to the at risk special needs population. The City will continue to support the efforts that provide housing and supportive services to at risk special needs individuals.

Describe the characteristics of special needs populations in your community.

In addition to those in asset poverty, there are also individuals with other special needs that put them at a higher risk of homelessness. Some special needs populations include the following characteristics: veterans, domestic violence survivors, abused and neglected children, the elderly, disabled, and persons with chronic issues (health, mental health, or substance abuse).

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

The housing and supportive needs are relatively consistent among all populations of homeless and those at-risk of homelessness which helps with the needs for the non-homeless population. The methodology used to determine needs is based on a review of local HMIS data (Homeless Data Dashboard), Coordinated Entry Assessments, Housing Priority List (HPL), annual PIT count data, coordination among Denton County Homelessness Leadership Team (HLT), analysis of community strengths and gaps, and grant performance reports from human services funding.

There are eight key focus areas for housing and supportive service needs in Denton including:
1. Affordable Housing
2. No Hunger;
3. Good Health and Well-being;
4. Family Stability;
5. Special Needs;
6. Making Homelessness Rare, Brief, and Nonrecurring;
7. Transportation access; and

While supportive services need vary based on each of the special needs, the system of delivery is relatively consistent among all populations of homeless and those at risk of homelessness. There are social service agencies working in collaboration to offer or coordinate housing programs and services unique to their client needs. Many receive direct funding to support their efforts.
Discuss the size and characteristics of the population with HIV/AIDS and their families within the Eligible Metropolitan Statistical Area.

The Texas Department of State Health Services sponsors a survey of persons at high risk for HIV called the National HIV Behavioral Surveillance (NHBS) system. The survey collects information including sexual and drug use behaviors from three populations:

- Heterosexuals at increased risk of HIV infection (HET)
- Men who have sex with men (MSM)
- Persons who inject drugs (PWID)

The NHBS found that of the three high risk populations surveyed in Dallas, PWID were most likely to report ever having been homeless (36%). Almost one in five MSM respondents reported ever being homeless (18%) while around one in seven HET respondents reported the same (14%).

Of the three surveyed groups, MSM were most likely to have HIV. MSM respondents who had never been homeless were actually slightly more likely to be HIV-positive than those who reported ever having been homeless (32% vs. 28%). Among PWID, one percent of the never homeless and four percent of the ever homeless were HIV-positive. The HET survey only recruited HIV-negative participants.

Discussion: See above discussion.
NA-50 Non-Housing Community Development Needs – 91.215 (f)

Describe the jurisdiction’s need for Public Facilities:

Over the past thirty years, the City of Denton has supported the development of public facilities in eligible neighborhoods using Community Development Block Grant (CDBG) and other funding sources. CDBG funds increase resident access to new or recently upgraded public facilities. This strengthens Denton’s neighborhoods and supports matching investment of private funds in housing and other improvements. Though most of the public facility improvements are funded through local sources, CDBG has, for the past thirty years, been an important resource for low- and moderate-income neighborhood improvements.

Results of the 2020-2022 Consolidated Plan Survey (ATTACHMENT 3) regarding the use of future CDBG, HOME and other funding sources indicated a need for public facility improvements in various areas of the city.

How were these needs determined?

As part of the development of the 2020-22 Consolidated Plan and 2020 Action Plan, Community Development held two public hearings in low and moderate-income neighborhoods where staff requested input on housing, neighborhood infrastructure, public services and other needs in the community and the specific neighborhood. The City of Denton also conducted a community wide needs assessment survey as part of the development of the 2020-22 Consolidated Plan which prioritized housing and community development activities. Below are the results of the needs assessment for Public Facilities:

Figure 5: Community Facility Needs

<table>
<thead>
<tr>
<th>COMMUNITY FACILITIES NEEDS</th>
</tr>
</thead>
<tbody>
<tr>
<td>Health Care Facilities</td>
</tr>
<tr>
<td>Child Care Centers</td>
</tr>
<tr>
<td>Youth Centers</td>
</tr>
<tr>
<td>Parks and Recreation Facilities</td>
</tr>
<tr>
<td>Community Centers</td>
</tr>
<tr>
<td>Libraries</td>
</tr>
<tr>
<td>Fire Stations and Equipment</td>
</tr>
<tr>
<td>Senior Centers</td>
</tr>
</tbody>
</table>

Weighted Average Need - Using "1" for Lowest and "5" for Greatest Need
Describe the jurisdiction’s need for Public Improvements.

Citizen comments indicated that streets, sidewalks, accessibility, drainage and water/sewer were the specific public improvements that are needed in the Denton community. Streets appeared to be the primary concerns of most citizens. In order to prioritize the street improvements, the City utilizes the “Overall Condition Index” (OCI) which scores streets at 0 – 100. A street will be placed on the reconstruction list if it ranked at 35 points or higher or has a water/waste water line that is being replaced in the street. The City provides funding from sources other than CDBG and HOME to complete a significant number of street improvements. Other public improvements will be determined by annual Action Plan input regarding the resident’s priorities for the coming year. Below are the results of the needs assessment for infrastructure:

How were these needs determined?

As part of the development of the 2020-22 Consolidated Plan and 2020 Action Plan, Community Development held two public hearings in low and moderate-income neighborhoods where staff requested input on housing, neighborhood infrastructure, public services and other needs in the community and the specific neighborhood. The City of Denton also conducted a community wide needs assessment survey as part of the development of the 2020-22 Consolidated Plan which prioritized housing and community development activities.
Describe the jurisdiction’s need for Public Services.

In the community wide needs assessment survey conducted as part of the development of the 2020-22 Consolidated Plan, community priorities for housing and community development Public Services needs were collected. Below are the results of the needs assessment for Public Services:

![Figure 7: Community Services Needs](image)

How are these needs determined?

As part of the development of the 2020-22 Consolidated Plan and 2020 Action Plan, Community Development held two public hearings in low and moderate-income neighborhoods where staff requested input on housing, neighborhood infrastructure, public services and other needs in the community and the specific neighborhood. The City of Denton also conducted a community wide needs assessment survey as part of the development of the 2020-22 Consolidated Plan which prioritized housing and community development activities. In addition, Community Development works closely with local public service agencies including participation in local collaborations and coalitions in several services areas.

The City is also provided with documentation of needs from the partners the City funds through the Human Services Grant. On an annual basis, these agencies request funding from the City based on community needs. This method of obtaining information from the local service agencies along with the community forums, public hearings, neighborhood association meetings, partner community needs assessments, and surveys have assisted in determining Denton’s need for various public services.
MARKET ANALYSIS

EXPECTED 3-YEAR FUNDING AMOUNT 2020-2022

- Affordable Housing
- No Hunger
- Good Health and Well-being
- Family Stability
- Special Needs
- Making Homelessness Rare, Brief, and Nonrecurring
- Transportation Access
- Economic Security

STRATEGIC & ACTION PLAN PRIORITIES

<table>
<thead>
<tr>
<th>HOUSEHOLDS</th>
<th>PRIORITY</th>
</tr>
</thead>
<tbody>
<tr>
<td>123</td>
<td>AFFORDABLE HOUSING</td>
</tr>
<tr>
<td></td>
<td>MAKING HOMELESSNESS RARE, BRIEF, &amp; NONRECURRING</td>
</tr>
<tr>
<td>7,560</td>
<td>PUBLIC SERVICES</td>
</tr>
<tr>
<td>4,500</td>
<td>PUBLIC FACILITIES, IMPROVEMENTS &amp; INFRASTRUCTURE</td>
</tr>
<tr>
<td>24,000</td>
<td>PLANNING &amp; ADMINISTRATION</td>
</tr>
</tbody>
</table>

A REPORT FOR THE U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT
Community Development Block Grant (CDBG) Program
HOME Investment Partnerships (HOME)
Housing Market Analysis

MA-05 Overview

Housing Market Analysis Overview:
The purpose of the Market Analysis is to discuss the housing market environment in which the City of Denton must administer its programs over the course of the Consolidated Plan. In conjunction with the Needs Assessment, the Market Analysis will provide the basis for the Strategic Plan goals and the Action Plan programs and projects to be administered.

This section of the Consolidated Plan includes information on the following:

- **MA-10** Number of Housing Units – 91.210(a)&(b)(2)
- **MA-15** Housing Market Analysis: Cost of Housing - 91.210(a)
- **MA-20** Housing Market Analysis: Condition of Housing – 91.210(a)
- **MA-25** Public and Assisted Housing – 91.210(b)
- **MA-30** Homeless Facilities and Services – 91.210(c)
- **MA-35** Special Needs Facilities and Services – 91.210(d)
- **MA-40** Barriers to Affordable Housing – 91.210(e)
- **MA-45** Non-Housing Community Development Assets – 91.215 (f)
- **MA-50** Needs and Market Analysis Discussion
- **MA-60** Broadband Needs of by Low- and Mod-Income Households - 91.210(a)(4), 91.310(a)(2)
- **MA-65** Hazard Mitigation - 91.210(a)(5), 91.310(a)(3)
MA-10 Number of Housing Units – 91.210(a)&(b)(2)

**Introduction**
The Housing Supply Analysis provides an estimate of the current supply of housing in the City of Denton. In this section, the existing housing inventory is examined, including the type and size by tenure (owners/renters).

According to the 2011-2015 CHAS, there are 47,419 housing units within the City of Denton, made up of approximately 20,855 (43.9%) owner units and 22,888 (48.2%) rental units. Household size and composition affect the demand for different housing types in a community. Also, the age of housing in a community can have a significant impact in terms of affordability, housing condition, and neighborhood stabilization, while also serving as an indicator of a City’s growth trends. Significantly, 60% of the owner units in the City were built prior to 2000 (Table 38). This could become a concern because many key major systems of a home have a life expectancy of about 20 years, including HVAC systems, roofs, and windows.

For low- and moderate-income households, there appears to be a need for affordable rental and homeowner units, repair of affordable owner-occupied units, and homelessness prevention. Smaller owner units for seniors are also a need, as well as supportive housing for persons with independent living difficulties and accessible units for persons with mobility limitations.

**All residential properties by number of units**

<table>
<thead>
<tr>
<th>Property Type</th>
<th>Number</th>
<th>%</th>
</tr>
</thead>
<tbody>
<tr>
<td>1-unit detached structure</td>
<td>25,900</td>
<td>55%</td>
</tr>
<tr>
<td>1-unit, attached structure</td>
<td>935</td>
<td>2%</td>
</tr>
<tr>
<td>2-4 units</td>
<td>3,880</td>
<td>8%</td>
</tr>
<tr>
<td>5-19 units</td>
<td>9,780</td>
<td>21%</td>
</tr>
<tr>
<td>20 or more units</td>
<td>5,015</td>
<td>11%</td>
</tr>
<tr>
<td>Mobile Home, boat, RV, van, etc.</td>
<td>1,909</td>
<td>4%</td>
</tr>
<tr>
<td>Total</td>
<td>47,419</td>
<td>100%</td>
</tr>
</tbody>
</table>

*Table 31 – Residential Properties by Unit Number*

*Data Source: 2011-2015 ACS*
Unit Size by Tenure

<table>
<thead>
<tr>
<th></th>
<th>Owners</th>
<th></th>
<th>Renters</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Number</td>
<td>%</td>
<td>Number</td>
<td>%</td>
</tr>
<tr>
<td>No bedroom</td>
<td>40</td>
<td>0%</td>
<td>935</td>
<td>4%</td>
</tr>
<tr>
<td>1 bedroom</td>
<td>155</td>
<td>1%</td>
<td>6,890</td>
<td>30%</td>
</tr>
<tr>
<td>2 bedrooms</td>
<td>2,345</td>
<td>11%</td>
<td>8,120</td>
<td>35%</td>
</tr>
<tr>
<td>3 or more bedrooms</td>
<td>18,315</td>
<td>88%</td>
<td>6,935</td>
<td>30%</td>
</tr>
<tr>
<td>Total</td>
<td>20,855</td>
<td>100%</td>
<td>22,880</td>
<td>99%</td>
</tr>
</tbody>
</table>

Table 31 – Unit Size by Tenure

Data Source: 2011-2015 ACS

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

According to the HUD data provided, a high percentage of Denton households are either cost burdened or severely cost burdened. Cost burdened households are paying more than the 30% of household income toward housing. Severe cost burden pays more than 50% of household income toward housing. With the needs assessment, 16,669 out of 43,737 total households in Denton were identified as cost burdened with 8,175 paying 30% - 50% of their total household income towards housing expenses and 8,494 severely cost burdened households paying over 50% of their household income on housing expenses. (NA, Table 21) This represents that 18.7% of all households are paying 30% - 50% of their total household income towards housing expenses and 19.4% of all households are paying more than 50% of their total household income towards housing expenses. Of the cost burdened households, approximately 18,638 (80%) households are renter households, compared to 4,604 (20%) homeowners. Cost burden households are the most pressing housing problem, especially at the lower income levels for renters.

Housing services the City will provide include: owner-occupied rehabilitation and homeownership assistance. The City targets extremely-low, low, and moderate-income families and individuals whose incomes are at or below 80% AMI. Household types targeted include family, elderly, disabled, homeless or at-risk of becoming homeless and special needs households.

According to the data, housing in Denton, both rental as well as owned housing, is generally more affordable than elsewhere in the region. However, the incomes of many of Denton’s households are also lower than other areas in the region.

These statistics, show that “affordable housing” remains too expensive for this group, forcing difficult trade-offs regarding the costs of health care, childcare, and food. As a result, persons at-risk of homelessness is an issue in Denton.
Denton has a higher percentage of subsidized affordable housing than neighboring communities. There are thirty-five (35) Low-Income Housing Tax Credit (HTC) properties in Denton County. Denton has thirteen (13) or 37% of the HTC properties. Of the thirty-four (34) municipalities in Denton County, only twelve (12) have HTC properties in their jurisdictions and only Lewisville has more than two HTC properties with six (6).

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

**HOUSING AUTHORITY**

The Denton Housing Authority (DHA) is not aware of any units being lost from the affordable housing inventory though some of its owned units are in need of replacement.

DHA own Heritage Oaks Apartments for seniors (140 units). This property was built in the ‘70’s and must be replaced. DHA is currently operating only 110 of these units due to foundation and accessibility issues. DHA plans to replace and build additional affordable housing for seniors.

**LOW INCOME HOUSING TAX CREDIT (HTC) UNITS**

There are no expected reductions in HTC units being lost from the affordable housing inventory during the span of this 2020-2022 Con Plan.

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

Per DHA, there are not sufficient housing units to meet the needs of the population. The DHA wait list has over 2,000 applicants waiting for housing assistance, which will only assist families earning at or below 30% of AMI. Families in the area making 31% to 80% of AMI are falling through the cracks because they may not qualify for housing assistance, but they are still experiencing severe rent burdens because of the lack of affordable housing.

Describe the need for specific types of housing:

Based on data analysis and community consultation efforts, affordable units and single-family homes for moderate income families is needed along with housing for special populations including seniors, the disabled and people experiencing homelessness.

Related to special populations, there is a need for more one-bedroom affordable units, for seniors and disabled persons. According to NLIHC data, the working minimum wage is $7.25/hr. in Texas. In order to afford a 2-bedroom unit in Denton County, the wages would need to be $23.10/hr. This results in seniors and the disabled from accessing affordable units on fixed incomes well below the wage needed.
For the disabled, DHA has indicated that there is a need for larger bedroom size accessible units. The trend (or what is required) in development is to make 1-bedroom unit accessible, but not 2, 3, or 4 bedrooms necessary to accommodate disabled families.

**Discussion**

Cost burden is a clear housing issue for Denton. Additional affordable units would reduce the rent burden many families are experiencing. As identified in the housing needs assessment, cost burden households paying more that 30% or 50% of income on housing is the most common of the four housing problems especially for households who are renters. Of the 23,242 cost burdened households, approximately 18,638 (80%) households are renter households, compared to 4,604 homeowners. Cost burden households are the most pressing housing problem, especially at the lower income levels for renters.

Increasing the number of homeowners is an important strategy. Two-income working families are interested in owning their own home. DHA indicated that these families are losing out on the “American Dream” of homeownership because of the high median income for the area and high cost of houses that are being built. This requires many households to locate units outside of the city, away from employment centers, public transportation, and public services.

As identified in the NA-10, approximately 10,387 single person households may require housing stability assistance programs such as rental assistance, affordable housing, opportunities for homeownership, and income assistance programs.
MA-15 Housing Market Analysis: Cost of Housing - 91.210(a)

Introduction:
This section will describe the general characteristics of the cost of housing based on available information with comparison from the 2000 Census, and 2005-2009 ACS and 2011-2015 ACS data.

Cost of Housing

<table>
<thead>
<tr>
<th></th>
<th>Base Year: 2009</th>
<th>Most Recent Year: 2015</th>
<th>% Change</th>
</tr>
</thead>
<tbody>
<tr>
<td>Median Home Value</td>
<td>141,600</td>
<td>154,300</td>
<td>9%</td>
</tr>
<tr>
<td>Median Contract Rent</td>
<td>642</td>
<td>766</td>
<td>19%</td>
</tr>
</tbody>
</table>

Table 23 - Cost of Housing

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

Rent Paid

<table>
<thead>
<tr>
<th>Rent Paid</th>
<th>Number</th>
<th>%</th>
</tr>
</thead>
<tbody>
<tr>
<td>Less than $500</td>
<td>2,143</td>
<td>9.4%</td>
</tr>
<tr>
<td>$500-999</td>
<td>16,094</td>
<td>70.3%</td>
</tr>
<tr>
<td>$1,000-1,499</td>
<td>3,755</td>
<td>16.4%</td>
</tr>
<tr>
<td>$1,500-1,999</td>
<td>595</td>
<td>2.6%</td>
</tr>
<tr>
<td>$2,000 or more</td>
<td>283</td>
<td>1.2%</td>
</tr>
<tr>
<td>Total</td>
<td>22,870</td>
<td>100.0%</td>
</tr>
</tbody>
</table>

Table 33 - Rent Paid

Data Source: 2011-2015 ACS

Housing Affordability

<table>
<thead>
<tr>
<th>% Units affordable to Households earning:</th>
<th>Renter</th>
<th>Owner</th>
</tr>
</thead>
<tbody>
<tr>
<td>30% HAMFI</td>
<td>665</td>
<td>No Data</td>
</tr>
<tr>
<td>50% HAMFI</td>
<td>5,710</td>
<td>1,864</td>
</tr>
<tr>
<td>80% HAMFI</td>
<td>16,495</td>
<td>5,057</td>
</tr>
<tr>
<td>100% HAMFI</td>
<td>No Data</td>
<td>7,222</td>
</tr>
<tr>
<td>Total</td>
<td>22,870</td>
<td>14,143</td>
</tr>
</tbody>
</table>

Table 34 - Housing Affordability

Data Source: 2011-2015 CHAS

Monthly Rent

<table>
<thead>
<tr>
<th>Monthly Rent ($)</th>
<th>Efficiency (no bedroom)</th>
<th>1 Bedroom</th>
<th>2 Bedroom</th>
<th>3 Bedroom</th>
<th>4 Bedroom</th>
</tr>
</thead>
<tbody>
<tr>
<td>Fair Market Rent</td>
<td>730</td>
<td>878</td>
<td>1,077</td>
<td>1,447</td>
<td>1,856</td>
</tr>
<tr>
<td>High HOME Rent</td>
<td>730</td>
<td>878</td>
<td>1,077</td>
<td>1,330</td>
<td>1,464</td>
</tr>
<tr>
<td>Low HOME Rent</td>
<td>676</td>
<td>724</td>
<td>868</td>
<td>1,003</td>
<td>1,120</td>
</tr>
</tbody>
</table>

Table 35 - Monthly Rent

Data Source: HUD FMR and HOME Rents
Is there sufficient housing for households at all income levels?

Figure 8: NA-10, Table 6

<table>
<thead>
<tr>
<th></th>
<th>0-30% HAMFI</th>
<th>&gt;30-50% HAMFI</th>
<th>&gt;50-80% HAMFI</th>
<th>&gt;80-100% HAMFI</th>
<th>&gt;100% HAMFI</th>
</tr>
</thead>
<tbody>
<tr>
<td>Total Households</td>
<td>8,325</td>
<td>5,944</td>
<td>7,825</td>
<td>4,375</td>
<td>17,280</td>
</tr>
</tbody>
</table>

Table 6 - Total Households Table

There is not sufficient housing in Denton for low- to moderate-income households especially for households earning between 0% and 30% AMI. For the 8,325 households identified in NA-10 (NA, Table 6) who are earning between 0% and 30% AMI, there are only 665 units affordable and no owner units that are affordable (Table 35). Low-income households earning between 30% and 50% of the AMI, also have a minimal number of housing options.

It appears, on the surface, that there is an abundance of affordable housing for the remaining income ranges. However, there are 3,754 Very Low-income (31-50% AMI) households who are 30% Cost Burdened and 1,870 Low-income (51-80% AMI) households who are severely cost burdened. This can be attributed to the occupancy of the affordable units by households with higher incomes and a shortage of units for large families, such as units with 4 or more bedrooms. Therefore, even with the availability of affordable units, many households are placed in overcrowded conditions.

Figure 9: NA-10, Table 9

<table>
<thead>
<tr>
<th></th>
<th>Renter</th>
<th>Owner</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>0-30% AMI</td>
<td>&gt;30-50% AMI</td>
</tr>
<tr>
<td>Total (income)</td>
<td>6,055</td>
<td>3,754</td>
</tr>
</tbody>
</table>

Table 9 – Cost Burden > 30%

Figure 10: NA-10, Table 10

<table>
<thead>
<tr>
<th></th>
<th>Renter</th>
<th>Owner</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>0-30% AMI</td>
<td>&gt;30-50% AMI</td>
</tr>
<tr>
<td>Total (income)</td>
<td>5,615</td>
<td>1,224</td>
</tr>
</tbody>
</table>

Table 10 – Cost Burden > 50%
How is affordability of housing likely to change considering changes to home values and/or rents?

The median home value increased by 9% from 2009 to 2015 and contract rent increasing by 19% (Table 33). Per the U.S. Census Bureau QuickFacts: Denton, Texas, median value of owner-occupied housing units, 2014-2018 value is $196,900, which is an increase of 27.5% and Median gross rent, 2014-2018 is $1,046, an increase of 36.5%. These amounts are a significant increase from 2015. Also, according to data from the Real Estate Center at Texas A&M University, median home sales price in Denton in 2019 was $260,000. U.S. Census Bureau, 2018 American Community Survey (ACS), 1-Year Estimate Average Rent was $1,146. Given the projected increase in population over the next three years and beyond, the continued increase in home values and rents is likely to reduce the number of available affordable housing units.

In an article from the Texas Tribune, “Texas is seeing affordability pressures grow maybe faster than the rest of the country.” Per the Joint Center for Housing Studies report, one of the problems that Texas has is that although housing is being built, almost none of it is affordable. “New construction is almost entirely at the high end,” According to the researcher, “the number of renter households in Texas is growing at twice the rate of owner households, and “when we look across the states, Texas does have one of the highest burden rates for low-income renters who are making less than $15,000.” (Juan Pablo Garnham, “More Texas renters are struggling to find affordable housing, new report finds”, TexasTribune.org)

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

U.S. Census Bureau, 2018 American Community Survey (ACS), 1-Year Estimate Average Rent was $1,146. During the same time frame the 2018 Fair Market Rent (FMR) $1,077. Average rents are generally higher than FMR. This affects the ability for agencies to use federal housing assistance funds like HOME, ESG and others where assisting with rents above FMR is not eligible.

Discussion: See previous sections
MA-20 Housing Market Analysis: Condition of Housing – 91.210(a)

Introduction
This section analyzes the condition of housing units in Denton, including the age of housing units and the risk of lead-based hazards. The City of Denton currently has 20,995 owner-occupied housing units and 22,745 rental units.

Definitions
“Standard” Unit:
- The unit meets HUD Housing Quality Standards (HQS).
- The unit meets all state and local codes. Properties which are in conformity with the standards of the International Residential Code (IRC) adopted by the state of Texas.

“Substandard” Unit:
- The unit is in poor condition, but it is both structurally and financially feasible to rehabilitate.
- Housing units that have one or more major and/or critical structural defects but can still be repaired for a reasonable amount. The cost to bring the property to code compliance does not exceed 75% of the appraised value of the property after rehabilitation.

Condition of Units

<table>
<thead>
<tr>
<th>Condition of Units</th>
<th>Owner-Occupied</th>
<th>Renter-Occupied</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Number</td>
<td>%</td>
</tr>
<tr>
<td>With one selected Condition</td>
<td>4,800</td>
<td>23%</td>
</tr>
<tr>
<td>With two selected Conditions</td>
<td>115</td>
<td>1%</td>
</tr>
<tr>
<td>With three selected Conditions</td>
<td>0</td>
<td>0%</td>
</tr>
<tr>
<td>With four selected Conditions</td>
<td>0</td>
<td>0%</td>
</tr>
<tr>
<td>No selected Conditions</td>
<td>15,945</td>
<td>76%</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td>20,860</td>
<td>100%</td>
</tr>
</tbody>
</table>

Table 36 - Condition of Units

Data Source: 2011-2015 ACS

Year Unit Built

<table>
<thead>
<tr>
<th>Year Unit Built</th>
<th>Owner-Occupied</th>
<th>Renter-Occupied</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Number</td>
<td>%</td>
</tr>
<tr>
<td>2000 or later</td>
<td>8,969</td>
<td>43%</td>
</tr>
<tr>
<td>1980-1999</td>
<td>6,209</td>
<td>30%</td>
</tr>
<tr>
<td>1950-1979</td>
<td>4,785</td>
<td>23%</td>
</tr>
<tr>
<td>Before 1950</td>
<td>899</td>
<td>4%</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td>20,862</td>
<td>100%</td>
</tr>
</tbody>
</table>

Table 37 – Year Unit Built

Data Source: 2011-2015 CHAS
**Risk of Lead-Based Paint Hazard**

<table>
<thead>
<tr>
<th>Risk of Lead-Based Paint Hazard</th>
<th>Owner-Occupied</th>
<th>Renter-Occupied</th>
</tr>
</thead>
<tbody>
<tr>
<td>Total Number of Units Built</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Before 1980</td>
<td>Number: 5,684</td>
<td>Number: 8,674</td>
</tr>
<tr>
<td></td>
<td>% 27%</td>
<td>% 38%</td>
</tr>
<tr>
<td>Housing Units build before 1980</td>
<td></td>
<td></td>
</tr>
<tr>
<td>with children present</td>
<td>Number: 4,479</td>
<td>Number: 2,824</td>
</tr>
<tr>
<td></td>
<td>% 21%</td>
<td>% 12%</td>
</tr>
</tbody>
</table>

**Table 38 – Risk of Lead-Based Paint**

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

**Vacant Units - Comprehensive data on vacant and abandoned units is not available.**

<table>
<thead>
<tr>
<th></th>
<th>Suitable for Rehabilitation</th>
<th>Not Suitable for Rehabilitation</th>
<th>Total</th>
</tr>
</thead>
<tbody>
<tr>
<td>Vacant Units</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Abandoned Vacant Units</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>REO Properties</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Abandoned REO Properties</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

**Table 9 - Vacant Units**

**Need for Owner and Rental Rehabilitation**

The age of housing newer than 1980 in Denton is 73% owner-occupied and 62% renter-occupied. However, where aging housing stock exists, it is more likely to require repair, maintenance, or upgrades. Twenty-four percent (24%) of owner-occupied units and 56% of renter-occupied units have at least one housing condition. Renter-occupied rental rehabilitation to address the physical problems in the rental housing market is limited to HOME grants provided to the City’s CHDO, Denton Affordable Housing Corporation, owned rental units. Significantly, 60% of the owner units in the City were built prior to 2000. Many key major systems of a home have a life expectancy of about 20 years, including HVAC systems, roofs, and windows.

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

Housing units built before 1979 are at risk of lead-based paint hazards. There are no known sources of reasonably accessible data that connects units with Lead-based Paint Hazards to a type of household/household income which would allow for an estimate to answer the question. Older housing units are more likely to be occupied by Extremely Low (0-30% AMI) and Very Low-income (31-50% AMI) households and in poor condition. Using the data available, it is possible that 21% of households including those with children present may lack the financial means to correct a lead hazard.
Discussion
Addressing unsafe and unhealthy conditions in ownership housing has long been a City priority. Support for housing programs targeting low- and moderate-income households has been the focus of Denton’s CDBG and HOME programs since their inception. Housing rehabilitation was the first major program developed and this has been expanded to include reconstruction of severely substandard units and a minor repair program for units with problems that require immediate attention.
MA-25 Public and Assisted Housing – 91.210(b)

Introduction
The Denton Housing Authority (DHA) was formed in 1970 to address the housing needs of low-income families in the city of Denton. DHA is a Section 8 only PHA and does not operate any public housing units. The DHA currently administers 1,641 Housing Choice Vouchers (also referred to as Section 8 or HCV) and a Homeownership Program. There are 2,042 on the waitlist for a HCV. DHA administers various public facility corporations to operate and manage other multi-family tax credit properties such as the Veranda and Renaissance Courts Townhomes, and Heritage Oaks and the Pecan Place Apartments which provides affordable housing for seniors.

Totals Number of Units

<table>
<thead>
<tr>
<th>Program Type</th>
<th>Certificate</th>
<th>Mod-Rehab</th>
<th>Public Housing</th>
<th>Vouchers</th>
<th>Project-based</th>
<th>Tenant-based</th>
<th>Special Purpose Voucher</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td># of units</td>
<td>available</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td># of</td>
<td>accessible</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Table 10 – Total Number of Units by Program Type

Data Source: PIC (PIH Information Center)

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

Describe the supply of public housing developments: Not applicable

Describe the number and physical condition of public housing units in the jurisdiction, including those that are participating in an approved Public Housing Agency Plan: Not applicable

Public Housing Condition

<table>
<thead>
<tr>
<th>Public Housing Development</th>
<th>Average Inspection Score</th>
</tr>
</thead>
<tbody>
<tr>
<td>N/A</td>
<td>N/A</td>
</tr>
</tbody>
</table>

Table 11 - Public Housing Condition

Describe the public housing agency's strategy for improving the living environment of low- and moderate-income families residing in public housing: Not applicable
MA-30 Homeless Facilities and Services – 91.210(c)

Introduction
This section will provide a brief inventory of facilities, housing, and services that meet the needs of homeless persons within the City of Denton, particularly chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth. The table below utilizes the 2020 Housing Inventory Count (HIC) and other housing program inventory.

Facilities and Housing Targeted to Homeless Households

<table>
<thead>
<tr>
<th>Facilities and Housing</th>
<th>Emergency Shelter Beds</th>
<th>Voucher / Seasonal / Overflow Beds</th>
<th>Transitional Beds</th>
<th>Permanent Supportive Housing Beds</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Year Round Beds (Current &amp; New)</td>
<td>Current &amp; New</td>
<td>Current &amp; New</td>
<td>Under Development</td>
</tr>
<tr>
<td>Households with Adult(s) and Child(ren)</td>
<td>HIC: 36 CUMB 25 DCFOF 11 Wheeler 6 MKOC 78</td>
<td>HIC: 7 DCFOF</td>
<td>HIC: 16 GLR 55 SONTX 71</td>
<td>HIC: 1 MHMR 12 GHI 9 HOPWA 22</td>
</tr>
<tr>
<td>Households with Only Adults</td>
<td>HIC: 5 DCFOF 82 MKOC 40 TSA 127</td>
<td>HIC: 8 Zoie 8</td>
<td>HIC: 7 GHI 7</td>
<td></td>
</tr>
<tr>
<td>Chronically Homeless Households</td>
<td></td>
<td></td>
<td>HIC: 21 MHMR 26 GHI 47</td>
<td>CoC PSH 20 MHMR 10 GHI 30</td>
</tr>
<tr>
<td>Veterans</td>
<td></td>
<td></td>
<td>HIC: 2 MHMR</td>
<td></td>
</tr>
<tr>
<td>Unaccompanied Youth</td>
<td></td>
<td></td>
<td>*</td>
<td></td>
</tr>
</tbody>
</table>

Table 12 - Facilities and Housing Targeted to Homeless Households

CUMB: Cumberland Children’s Presbyterian Home
DCFOF: Denton County Friends of the Family
MHMR: Denton County MHMR
GLR: Grace Like Rain
GHI: Giving Hope, Inc.
HOPWA: Housing Opportunities for Persons With AIDS
MKOC: Monsignor King Outreach Center
SONTX: Solutions of North Texas
TSA: The Salvation Army, Denton
Zoie: Zoie’s Place
Describe mainstream services, such as health, mental health, and employment services to the extent those services are used to complement services targeted to homeless persons

Supportive services are an integral part of all the programs targeted to the homeless in the Denton community. Supportive services operate in conjunction with outreach, shelter, housing programs and local social services agency programs to support the goal of long-term housing stability. Experience and best practice involves not just housing a household experiencing homelessness but also the provision housing stability programs meant to support maintaining housing. Local activities typically include:

- Case management services to offer support with housing search and placement, financial planning, life skills education, job and employment assistance services;
- Mental and physical health care through clinics and social services agencies; and
- Support with other activities for daily living provide by many social service agencies.

HUD defines mainstream services as services that come from the Department of Health and Humans Services, such as Medicare, Medicaid, SNAP, and TANF. A variety of nonprofit service providers located in Denton offer supportive services to complement service needs of people experiencing homelessness, including behavioral health, case management, substance abuse treatment, job training, transportation, and food security. A sample of local providers include:

- **Texas Workforce Solutions**: provide a variety of services and program to assist low-income adults and youth in acquiring training and employment
- **Denton County Veteran's Center**: providing a suite of services under one roof ensuring effective and integrative care - Hosted Service Providers: Catholic Charities of Fort Worth, Denton County Veterans Coalition, HUDVASH Case Management, Military Veteran Peer Network, Project Camo, Texas Veterans Commission, Veteran Community Navigators, Volunteer Income Tax Assistance, Youth and Family Counseling
- **Texas Veterans Commission**: provides employment resources and referral services with one-on-one counseling to military veterans
- **Denton County MHMR**: provides services to individuals with mental illness, including case management, supported housing, counseling, skills training, supported employment, assertive community treatment, medication clinic, and children’s mental health services
- **Denton County Friends of the Family**: provides services include safety planning, case management, legal advocacy and transitional housing for those who qualify. Residents are able to access counseling, both for themselves and their children, help in securing available financial services and support in achieving independent living.
- **Our Daily Bread**: provides food, transportation, supportive services, laundry, computer and phone usage, referrals, application assistance to access services,
- **Denton Community Health Clinic**: Free medical clinic open to the public
- **Solutions of North Texas**: provides safe and structured transitional housing to men and women recovering from alcoholism and/or drug addiction.
List and describe services and facilities that meet the needs of homeless persons, particularly chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth. If the services and facilities are listed on screen SP-40 Institutional Delivery Structure or screen MA-35 Special Needs Facilities and Services, describe how these facilities and services specifically address the needs of these populations.

Homelessness is experienced in a variety of settings and includes multiple entry points. In Denton, there are various systems of care that provide housing and supportive services to those experiencing homelessness to assist them in ending their homelessness. These programs take the form of outreach, emergency shelter, supportive housing, rapid re-housing, and prevention of homelessness programs in a comprehensive housing crisis response system.

Services and facilities that meet the needs of homeless persons, particularly chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth include:

- **Street Outreach (SO) Teams.** SO teams reach out to unsheltered homeless people on the street to connect them with emergency shelter, housing, or critical services. The program offers case management and supportive services. It provides urgent, non-facility-based care to unsheltered homeless people who are unwilling or unable to access emergency shelter, housing, or an appropriate health facility.

- **Emergency Shelters.** ES is short-term housing is designed to address the immediate and emergency shelter needs of homeless persons living on the street by providing temporary housing and by providing supportive services to help enable homeless persons to become more independent to regain housing. There are three emergency shelters in the jurisdiction. Two are generally for homeless individuals, but it has the resources to provide some shelter in hotels for homeless families. The other shelter specifically serves victims of domestic violence and sexual assault.

- **Homelessness Prevention (HP) Services.** HP services provide short- and/or medium-term rental assistance necessary to prevent an individual or family from moving into an emergency shelter or another place not fit for human habitation. HP programs serve any category of persons and families in need but with a priority for families, victims of domestic violence, and veterans.

- **Rapid Re-Housing (RRH) programs.** RRH provides housing relocation and stabilization services and assistance as necessary to help a homeless individual or family move as quickly as possible into permanent housing and achieve stability in that housing. Priority is given to those in shelters including the chronically homeless, veterans, families, and victims of domestic violence.

- **Supportive Housing Programs.** Supportive Housing (SH) programs offer a supportive temporary housing program where clients receive some level of housing placement and
rental assistance combined with case management designed to help client achieve self-sufficiency and exit the program over a determined amount of time. Priority is given to single parent households and domestic violence victims. There are also programs dedicated to those with substance abuse issues. Permanent Supporting (PSH) programs offer housing for people who need long-term housing assistance and intensive supportive services specifically related to health and mental health supports to stay housed. Locally, there is HOPWA which is housing for persons with AIDs.

Homeless individuals and families are served by a wide range of organizations; the primary facilities that address homeless needs include:

- **Denton County Friends of the Family**: CDBG supported emergency shelter and provision of services include safety planning, case management, legal advocacy, and transitional housing for those who qualify. Residents can access counseling, both for themselves and their children, help in securing available financial services and support in achieving personal growth and independent living.

- **Denton County MHMR**: provides CoC Grant Permanent supportive housing (PSH) with indefinite rental assistance paired with supportive services to assist homeless persons with a disability or families with an adult or child member with a disability achieve housing stability.

- **Giving Hope, Inc.**: provides CoC Grant Permanent supportive housing (PSH) with indefinite rental assistance paired with supportive services to assist homeless persons with a disability or families with an adult or child member with a disability achieve housing stability.

- **Grace Like Rain**: Housing, childcare, transportation case management. Emergency Shelter at the Wheeler House for expected stays are 2 to 4 weeks.

- **Monsignor King Outreach Center**: Emergency shelter funded by City General funds, provides emergency assistance, care, and comfort to homelessness by providing shelter, a meal, and supportive services in collaboration with other community agencies. MKOC includes an enhanced shelter program supporting housing focused case management and City general funded RRH.

- **Our Daily Bread**: Provides for food security, City general funded supported housing case management, and other supportive services during the day to people experiencing and at-risk of homelessness. ODB also conducts City general funded SO to unsheltered homeless people on the street to connect them with emergency shelter, housing, or critical services and City general funded RRH.

- **Salvation Army of Denton**: provides emergency housing for any man, woman, or family, along with food, clothing, laundry supplies, transportation, employment services and personal hygiene products; residents may also access case management services

- **United Way of Denton County**: provides Denton County Homelessness Barriers Fund supported by City general fund for opening doors and reducing barriers to stable housing.
**MA-35 Special Needs Facilities and Services – 91.210(d)**

**Introduction**
The section of the plan will describe the facilities and services that assist persons who are not homeless but who require supportive housing, and programs for ensuring that persons returning from mental and physical health institutions receive appropriate supportive housing. This will include information regarding priority housing and supportive service needs of persons who are not homeless but who may or may not require supportive housing including elderly, frail elderly, persons with disabilities (mental, physical, developmental), persons with alcohol or other drug addictions, persons with HIV/AIDS and their families, and public housing residents.

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

Supportive housing needs are the same as identified in NA-45. Supportive housing is designed to provide temporary and permanent housing solutions to special needs populations with accompanying supportive services to encourage independent living. Some agencies provide specific supports to a special needs group, while others have a wider-ranging set of services. Supportive housing providers for the elderly and disabled include the following:

- Fairoaks of Denton
- Denton Affordable Housing Corp who has twenty-four (24) units that are Section 811 Supportive Housing for Persons with Disabilities & Long Term Special Needs

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

While Denton does not have a discharge policy, it is utilizing the Coordinated Entry Process (CE) and Housing Priority List (HPL) to assess the need of everyone experiencing or at risk of homelessness. This practice of assessing every individual in need allows this community to direct the client regardless of circumstance to available resources needed to obtain appropriate supportive housing services. The data collected is also providing valuable information when clients were not able to secure adequate housing or supportive services. This includes gap analysis of existing systems and services as well as be a tool to help this community better utilize its limited resources.
Specify the activities that the jurisdiction plans to undertake during the next year to address the housing and supportive services needs identified in accordance with 91.215(e) with respect to persons who are not homeless but have other special needs. Link to one-year goals.

Activities that the City may support, as funding allows, through City or CDBG-funded organizations priorities needs align with HUD’s goals for safe, stable communities, including **Decent Housing, a Suitable Living Environment, and Expanded Economic opportunities** as well as the City’s key focus area for **Safe, Liveable, and Family-Friendly Communities**. These include:

1. Affordable housing assistance programs:
   a. Implement or provide grants for Preserving Affordable housing through Repair, Renovation, Reconstruction, and Rental Rehabilitation projects
   b. Development Fee Grant to support the creation of Affordable Housing units
   c. Public Services Grants for utility assistance programs that increase housing Stability and prevent homelessness
   d. Public Services Grants for rental assistance increase Housing Stability and prevent homelessness
   e. Completion of a City general funded Affordable Housing Assessment
2. Public Services, Facility, and/or Infrastructure Grants to combat Food Insecurity;
3. Public Services, Facility, and/or Infrastructure Grants to increase availability and access to Health, Mental Health, and Behavioral Health Care;
4. Public Services, Facility, and/or Infrastructure Grants to improve Family Stability by improving safety, support, and opportunity including access to affordable childcare;
5. Public Services, Facility, and/or Infrastructure Grants to increase availability and access to services for special needs populations (seniors, disabled, veterans, abused and neglected children, and victims of domestic violence);
6. Public Services, Facility and/or Infrastructure Grants to make homelessness rare, brief, and nonrecurring;
7. Intergovernmental collaboration and Public Services, Facility and/or Infrastructure Grants to increase access to Transportation increasing housing and workforce stability; and
8. Public Services Grants to increase access to mobility, educational programs, and workforce development for Economic security.

For entitlement/consortia grantees: Specify the activities that the jurisdiction plans to undertake during the next year to address the housing and supportive services needs identified in accordance with 91.215(e) with respect to persons who are not homeless but have other special needs. Link to one-year goals. (91.220(2)) Denton is not part of a consortia.
MA-40 Barriers to Affordable Housing – 91.210(e)

Describe any negative effects of public policies on affordable housing and residential investment.

Generally, barriers to the development of affordable housing are the factors that increase the cost of housing development. These can include:

- **Development Policy:** Through zoning ordinances, permit systems, and housing codes and building standards, the City has attempted to ensure the health, safety, and quality of life of its residents while minimizing the barriers that may impede the development of affordable housing. None of these measures is intended to restrict the affordability of housing, though these regulations may on occasion affect the development costs of housing.

- **Market constraints:** These include the availability, cost, and competition for land/ existing inventory of housing units as compared to demand. Competition adds cost to a project and will affect the development costs of housing.

- **Access and Cost of Capital:** These are the constraints of limited funding sources, finance costs, and the costs of construction. Limited access to capital through lending reduces the number of projects that can be completed which will restrict supply. Higher financing costs and costs of materials and workers affect the development costs of housing.

Denton’s Planning and Development staff have reviewed the City’s building/property codes, zoning, impact fees, and other requirements affecting the development of housing in the community. Community Development staff has also reviewed information on the number of affordable units in the city, the number of Denton Housing Authority voucher holders that live in Denton, projects completed by the Denton Affordable Housing Corporation, and the number of low income housing tax credit units funded through the State that have been built or renovated in the city.

Barriers to accessing affordable housing are factors that include household income and housing cost. The Housing Needs Assessment addressed the factors of income and housing costs. In addition, there are lending and foreclosure practices, which are outside the scope and control of City policy. There are other barriers associated with poverty such as personal finances (lack of down payment, credit history, employment history) that affect the access and availability of affordable housing for residents.
MA-45 Non-Housing Community Development Assets – 91.215 (f)

Introduction
According to the Denton Plan 2030, it is through a growing economy that the City of Denton will drive the private and public investments necessary to improve the quality of life and place desired by the community. With two growing universities the students, a significant asset for the city. The universities are economic building blocks from which research partnerships can emerge, employers can staff jobs, and entrepreneurial start-ups can spin off. According to the Business Activity data from the U.S. Census Bureau, nearly a quarter of the jobs located in Denton are in Education Services. As the universities evolve their educational programs to prepare new graduates to fill well-paying jobs offered by growing industries, the City can strengthen its position as an education hub.

Economic Development Market Analysis:

Business Activity

<table>
<thead>
<tr>
<th>Business by Sector</th>
<th>Number of Workers</th>
<th>Number of Jobs</th>
<th>Share of Workers %</th>
<th>Share of Jobs %</th>
<th>Jobs less workers %</th>
</tr>
</thead>
<tbody>
<tr>
<td>Agriculture, Mining, Oil &amp; Gas Extraction</td>
<td>588</td>
<td>111</td>
<td>1</td>
<td>0</td>
<td>-1</td>
</tr>
<tr>
<td>Arts, Entertainment, Accommodations</td>
<td>6,949</td>
<td>6,656</td>
<td>15</td>
<td>16</td>
<td>1</td>
</tr>
<tr>
<td>Construction</td>
<td>2,471</td>
<td>1,940</td>
<td>5</td>
<td>5</td>
<td>-1</td>
</tr>
<tr>
<td>Education and Health Care Services</td>
<td>6,734</td>
<td>8,695</td>
<td>14</td>
<td>21</td>
<td>6</td>
</tr>
<tr>
<td>Finance, Insurance, and Real Estate</td>
<td>3,473</td>
<td>2,040</td>
<td>7</td>
<td>5</td>
<td>-3</td>
</tr>
<tr>
<td>Information</td>
<td>883</td>
<td>194</td>
<td>2</td>
<td>0</td>
<td>-1</td>
</tr>
<tr>
<td>Manufacturing</td>
<td>4,421</td>
<td>7,381</td>
<td>9</td>
<td>18</td>
<td>8</td>
</tr>
<tr>
<td>Other Services</td>
<td>1,505</td>
<td>1,179</td>
<td>3</td>
<td>3</td>
<td>0</td>
</tr>
<tr>
<td>Professional, Scientific, Management Services</td>
<td>4,223</td>
<td>2,539</td>
<td>9</td>
<td>6</td>
<td>-3</td>
</tr>
<tr>
<td>Public Administration</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td>Retail Trade</td>
<td>6,621</td>
<td>6,160</td>
<td>14</td>
<td>15</td>
<td>1</td>
</tr>
<tr>
<td>Transportation and Warehousing</td>
<td>2,309</td>
<td>1,489</td>
<td>5</td>
<td>4</td>
<td>-1</td>
</tr>
<tr>
<td>Wholesale Trade</td>
<td>2,771</td>
<td>1,144</td>
<td>6</td>
<td>3</td>
<td>-3</td>
</tr>
<tr>
<td>Total</td>
<td>42,948</td>
<td>39,528</td>
<td>--</td>
<td>--</td>
<td>--</td>
</tr>
</tbody>
</table>

Table 13 - Business Activity

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

<table>
<thead>
<tr>
<th>Employment/Unemployment</th>
<th>Number of People</th>
</tr>
</thead>
<tbody>
<tr>
<td>Total Population in the Civilian Labor Force</td>
<td>70,165</td>
</tr>
<tr>
<td>Civilian Employed Population 16 years and over</td>
<td>63,665</td>
</tr>
<tr>
<td>Unemployment Rate</td>
<td>9.30</td>
</tr>
<tr>
<td>Unemployment Rate for Ages 16-24</td>
<td>25.85</td>
</tr>
<tr>
<td>Unemployment Rate for Ages 25-65</td>
<td>5.25</td>
</tr>
</tbody>
</table>

*Table 14 - Labor Force*

Data Source: 2011-2015 ACS

**Occupations by Sector**

<table>
<thead>
<tr>
<th>Occupation</th>
<th>Number of People</th>
</tr>
</thead>
<tbody>
<tr>
<td>Management, business and financial</td>
<td>14,534</td>
</tr>
<tr>
<td>Farming, fisheries and forestry occupations</td>
<td>2,705</td>
</tr>
<tr>
<td>Service</td>
<td>8,015</td>
</tr>
<tr>
<td>Sales and office</td>
<td>15,785</td>
</tr>
<tr>
<td>Construction, extraction, maintenance and repair</td>
<td>3,818</td>
</tr>
<tr>
<td>Production, transportation and material moving</td>
<td>2,600</td>
</tr>
</tbody>
</table>

*Table 15 - Occupations by Sector*

Data Source: 2011-2015 ACS

**Travel Time**

<table>
<thead>
<tr>
<th>Travel Time</th>
<th>Number</th>
<th>Percentage</th>
</tr>
</thead>
<tbody>
<tr>
<td>&lt; 30 Minutes</td>
<td>41,044</td>
<td>69%</td>
</tr>
<tr>
<td>30-59 Minutes</td>
<td>14,009</td>
<td>24%</td>
</tr>
<tr>
<td>60 or More Minutes</td>
<td>4,184</td>
<td>7%</td>
</tr>
<tr>
<td>Total</td>
<td>59,237</td>
<td>100%</td>
</tr>
</tbody>
</table>

*Table 16 - Travel Time*

Data Source: 2011-2015 ACS

**Education:**

**Educational Attainment by Employment Status (Population 16 and Older)**

<table>
<thead>
<tr>
<th>Educational Attainment</th>
<th>In Labor Force</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Civilian Employed</td>
<td>Unemployed</td>
</tr>
<tr>
<td>Less than high school graduate</td>
<td>4,210</td>
<td>270</td>
</tr>
<tr>
<td>High school graduate (includes equivalency)</td>
<td>7,825</td>
<td>820</td>
</tr>
<tr>
<td>Some college or Associate’s degree</td>
<td>15,185</td>
<td>1,075</td>
</tr>
<tr>
<td>Bachelor’s degree or higher</td>
<td>17,435</td>
<td>955</td>
</tr>
</tbody>
</table>

*Table 17 - Educational Attainment by Employment Status*

Data Source: 2011-2015 ACS
### Educational Attainment by Age

<table>
<thead>
<tr>
<th>Age</th>
<th>18–24 yrs</th>
<th>25–34 yrs</th>
<th>35–44 yrs</th>
<th>45–65 yrs</th>
<th>65+ yrs</th>
</tr>
</thead>
<tbody>
<tr>
<td>Less than 9th grade</td>
<td>440</td>
<td>730</td>
<td>919</td>
<td>1,570</td>
<td>595</td>
</tr>
<tr>
<td>9th to 12th grade, no diploma</td>
<td>1,620</td>
<td>1,120</td>
<td>1,085</td>
<td>1,220</td>
<td>748</td>
</tr>
<tr>
<td>High school graduate, GED, or alternative</td>
<td>5,615</td>
<td>3,859</td>
<td>2,500</td>
<td>5,175</td>
<td>2,910</td>
</tr>
<tr>
<td>Some college, no degree</td>
<td>17,080</td>
<td>5,899</td>
<td>3,680</td>
<td>5,835</td>
<td>2,675</td>
</tr>
<tr>
<td>Associate's degree</td>
<td>1,280</td>
<td>1,688</td>
<td>1,140</td>
<td>1,495</td>
<td>775</td>
</tr>
<tr>
<td>Bachelor's degree</td>
<td>2,375</td>
<td>5,775</td>
<td>3,130</td>
<td>5,099</td>
<td>2,050</td>
</tr>
<tr>
<td>Graduate or professional degree</td>
<td>245</td>
<td>2,345</td>
<td>1,725</td>
<td>3,494</td>
<td>2,225</td>
</tr>
</tbody>
</table>

**Table 18 - Educational Attainment by Age**

**Data Source:** 2011-2015 ACS

### Educational Attainment – Median Earnings in the Past 12 Months

<table>
<thead>
<tr>
<th>Educational Attainment</th>
<th>Median Earnings in the Past 12 Months</th>
</tr>
</thead>
<tbody>
<tr>
<td>Less than high school graduate</td>
<td>67,608</td>
</tr>
<tr>
<td>High school graduate (includes equivalency)</td>
<td>105,006</td>
</tr>
<tr>
<td>Some college or Associate degree</td>
<td>164,277</td>
</tr>
<tr>
<td>Bachelor's degree</td>
<td>182,599</td>
</tr>
<tr>
<td>Graduate or professional degree</td>
<td>169,729</td>
</tr>
</tbody>
</table>

**Table 19 – Median Earnings in the Past 12 Months**

**Data Source:** 2011-2015 ACS

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

The top five employment sectors for the city of Denton are:

- Education and Health Care Services 22%
- Manufacturing 18.7%
- Arts, Entertainment, Accommodations 16.8%
- Retail Trade 15.6%
- Professional, Scientific and Management Services 6.4%

Describe the workforce and infrastructure needs of the business community:

Key workforce and infrastructure needs in the City of Denton center around four interrelated areas:

- Ensuring a continuum of relevantly skilled workforce to support the current/future success of Denton’s existing businesses and targeted industry recruitment sectors;
Increasing and diversifying the number of Denton businesses offering higher pay positions to retain graduates of the 50,000+ students enrolled in Denton’s two universities and neighboring community college;

Improving the alignment and depth of “stackable” skills certifications and degrees available that lead to sustainable employment opportunities and wages.

Ensuring that the workforce and employment centers are connected via reliable infrastructure networks and transportation options.

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

The City of Denton established two Tax Increment Reinvestment Zones (TIRZ) within the City. The Downtown TIRZ covers 206 acres in Denton’s downtown core area and helps to facilitate development/redevelopment projects that target higher-technology business needs and the residential/leisure preferences of higher-wage professionals. The Westpark TIRZ provides approximately 800 new industrial acres available for a wide spectrum of manufacturing, logistics and industry needs. Increasing development in the Westpark TIRZ has added hundreds of jobs to the Denton economy, with additional developments planned to be under construction soon. The density of these development areas, along with other developing retail corridors along Loop 288 and U.S. 380/University Drive, have added jobs, shopping and entertainment options, and valuable quality of life resources to our community.

The development of our community, creation of new businesses, and new higher density developments have led to the City focusing on infrastructure needs to ensure water, wastewater, and road infrastructure are capable of handling the additional demand and growth. In addition, new employers in these areas have led to City to focus on working with education partners to ensure we have a trained workforce from the local secondary and higher education institutions.

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

Denton has sufficient labor to meet lower paying occupations, however these occupations may not provide a sustainable family income. This is evidenced by the statistic that forty percent of Denton ISD students are classified as economically disadvantaged. However, the Denton Advanced Technology Center and North Central Texas College have increased their focus on career and technical education programs that align with higher paying jobs and with the needs of local employers. This leads to individuals leaving Denton to pursue higher wage jobs.
There is insufficient employment available for higher-wage financial/insurance and information technology professionals living in Denton and graduating from Denton’s higher education providers.

Additional training pathways are required for manufacturing technology, healthcare and education sector support and growth.

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

The following are Denton’s current initiatives:

- The City of Denton Economic Development staff participates with regional municipalities and the local Texas Workforce Commission Board in the North Central Texas Regional Economic Development Steering Committee for addressing existing and future workforce skills needs of our respective and regional employers. The Committee is a participant in Texas Workforce Commission’s High Demand Job Training Program that identifies and develops the skill sets of individuals for jobs in high-demand occupations in our respective region and cities.
- Denton’s Economic Development Partnership Board adopted a Strategic Plan previously and is currently working on a new strategic plan that provides a means to address Denton’s key workforce needs.
- Denton ISD’s Career and Technology Advisory Board industry partners provide curriculum expertise and internship opportunities to students enrolled in the district’s 31 career skills and certification training programs covering 11 career fields. Dual high-school/college credit classes are offered to high school juniors and seniors.
- North Central Texas College (NCTC) has developed certifications and associate degree programs for specific industry partners, such as the Petroleum Technology Certification and Associate Degree options. NCTC is a partner to businesses utilizing Skills Training grant funds.

These efforts support the Consolidated Plan goal of low and moderate-income persons having the opportunity to earn higher wages.

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

Yes, the City of Denton actively participated on the advisory committee of regional stakeholders that prepared the Comprehensive Economic Development Strategy (CEDS) for the North Central Texas Region.
If so, what economic development initiatives are you undertaking that may be coordinated with the Consolidated Plan? If not, describe other local/regional plans or initiatives that impact economic growth.

The City of Denton is aligned with the Consolidated Plan through our strategic efforts to develop a competitive workforce, including focusing on training programs that can best prepare students entering the workforce and assisting employers develop or fund on-the-job technical training programs. The City is also developing a more robust entrepreneurship support program to assist new and small businesses.
Ma-50 Needs and Market Analysis Discussion

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

An area with a multiple housing problem concentration is defined as a census tract where the number of households with any four severe housing problems exceeds 51% of the total number of the census tract. The map below shows areas of concentrations of housing problems by extremely low-income, low income, and moderate-income family categories.

Figure 11: Percent of Low Income Households with Any of 4 Severe Housing Problems

A newer, southeastern and northwestern portion and an existing affluent south portion, of the City are shown to have no concentration of housing problems. As discussed previously in the Needs Assessment, the main cause of severe housing problems for Denton is the high cost burden on households.


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

Areas with concentration low-income families are defined as census tracts in which 51% or more of the families residing in the tract have annual incomes at or below 80% of the area median income. These areas are in the original neighborhoods of Denton around the university campuses and extending south west to rural newly annexed areas.

An area with a minority concentration is defined as a census tract with a population of a single minority group exceeding 51% of the total population of the census tract. Denton does not have any such qualifying areas. The maps next show areas with concentrations.
Figure 12: Concentration by racial or ethnic minorities

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

See MA-10 through MA-20 responses.

Are there any community assets in these areas/neighborhoods?

See MA-45.

Are there other strategic opportunities in any of these areas?

The City is in the process of conducting an Affordable Housing Assessment which creates strategic opportunities for housing in the City of Denton. Completion of the assessment will support Community Development efforts to:

- Develop **Policy** that incentivizes housing and manages growth.
- Generate diversified **Funding** for the acquisition, preservation or construction of affordable housing units.
- Invest in the acquisition, preservation and/or construction of affordable housing through a diverse set of **Housing Programs**.
- **Advocate** for public support of agreed upon solutions.

With the completed assessment and updated Census data the City has the strategic opportunity to begin developing Neighborhood Revitalization Strategies in preparation for the next Consolidated Plan that will support a systematic approach improving neighborhoods where residents have safe, stable, affordable housing and have access to opportunity. Relevant data supports:

- Developing coordination strategies across service sectors and cultivation of systems to better match services to identified need;
- Identifying and continuously evaluating the strengths and gaps in housing and supportive services including improving systems to share best practices information across service sectors;
- Collecting and utilizing data that informs system-wide based decision making for selecting programmatic approaches and funding directions;
- Supporting services and facilities that meet the needs of people in the neighborhoods where they live.
MA-60 Broadband Needs of Housing occupied by Low- and Moderate-Income Households - 91.210(a)(4), 91.310(a)(2)

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

The 2018 US Census American Community Survey (DP02) reports that 85.4% of households have broadband Internet subscription The City has assessed an infrastructure plan to identify existing infrastructure, opportunities for expansion, and areas with greatest need/highest priority.

Figure 13: List of Homes without cable
Describe the need for increased competition by having more than one broadband Internet service provider serve the jurisdiction.

Most of the city of Denton is serviced by Charter Communications and Frontier Communications Corporation through cable and fiber lines. Nextlink Residential also offers fixed wireless services and some areas in south Denton (near Hickory Creek Rd.) have additional options available including Grande Communications. The table below shows a summary of available options according to the Federal Communication Commission (FCC) broadband map. For reference, the FCC defines high-speed as 25 megabits per second (mbps).

Figure 14: Broadband speeds

<table>
<thead>
<tr>
<th>Provider</th>
<th>Technology</th>
<th>Download Speeds</th>
<th>Upload Speeds</th>
<th>Notes</th>
</tr>
</thead>
<tbody>
<tr>
<td>Charter Communications</td>
<td>Cable</td>
<td>300 mbps</td>
<td>20 mbps</td>
<td></td>
</tr>
<tr>
<td>Frontier Communications</td>
<td>Fiber</td>
<td>30 mbps</td>
<td>30 mbps</td>
<td></td>
</tr>
<tr>
<td>Grande Communications</td>
<td>Cable</td>
<td>400 mbps</td>
<td>20 mbps</td>
<td>Available in south Denton</td>
</tr>
<tr>
<td>HughesNet</td>
<td>Satellite</td>
<td>25 mbps</td>
<td>3 mbps</td>
<td></td>
</tr>
<tr>
<td>Frontier Communications</td>
<td>DSL</td>
<td>30 mbps</td>
<td>30 mbps</td>
<td></td>
</tr>
<tr>
<td>ViaSat, Inc.</td>
<td>Satellite</td>
<td>12 mbps</td>
<td>3 mbps</td>
<td></td>
</tr>
</tbody>
</table>

Unfortunately, the City does not have authority by state or federal law to control the provision of service; however, staff has tried to work on behalf of the residents and request the service providers extend service. Since January 2018, staff has reached out to various providers, including Charter, CenturyLink, Frontier, and Verizon Wireless, to inquire if this area could be serviced. Charter and Frontier, both of the major companies with infrastructure in Denton, indicated that it would require a substantial investment (Charter estimated over $140,000) to provide a connection to this neighborhood. Verizon Wireless does offer some cellular based internet options for residents, including an LTE Internet and Home Phone device.

In addition to the Preserve at Pecan Creek, staff is aware of approximately 20 addresses in Denton without access to high-speed internet. This list has parcels in the 6400 block of Crapemrytle Drive, 4800 block of Crossvine Court, and the 4900-5000 block of Swisher and includes new construction and empty lots.
MA-65 Hazard Mitigation - 91.210(a)(5), 91.310(a)(3)

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

Hazard mitigation is a concern in many communities. Hazards can be broadly defined and may include daily environmental hazards such as noise, polluted stormwater runoff, and air pollution from vehicular traffic and industrial emissions. Hazards also include tornadoes, floods and other natural disasters, and man-made disasters from industrial accidents and terrorist or criminal activity. (Denton Plan 2030, p.222)

The Denton County Hazard Mitigation Action Plan has identified the following natural hazards as having the potential to cause damage in the county: dam failure, drought, earthquake, expansive soils, extreme heat, flooding, high winds, lightning, tornado, wildland fire, and winter storms. Wildland fire, flooding, and dam failure are only hazards recognized to have predictable geographic vulnerable areas. All other hazards are equally likely to occur geographically throughout the Denton County jurisdictions.

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

The Hazard and Vulnerability Assessment is a tool that the City of Denton used to better understand the specific hazards facing citizens and business, and to identify the areas and facilities at risk. According to the 2019 Denton Hazard and Vulnerability Assessment, the following event scored a high impact to property in a variety of events:

- Naturally Occurring Events: Thunderstorm/Hail/Lighting and Tornado
- Technologic Events: Water Failure
- Human Related Events: Civil Disturbance and Terrorist Act
- Structure Fires
- Technical Rescue: Structural Collapse and Water Rising

Issues that were consider in the assessment for property impact included the cost to set up temporary replacement, cost to repair or replace, time to recover and environmental impact.

The areas of high impact to property provided above impacts low and moderate-income households at a high rate. Low and moderate-income residents are at particular risk due to having less available resources. A dramatic rise in electricity or housing costs could put them at imminent risk of homelessness or living in substandard conditions. When Denton has an event that does not merit a federal declaration, there are not as many options for aid to people who
are uninsured or underinsured. Flash floods are one example of an event that usually does not rise to a federal level but that impacts a large number of people without insurance. This type of unexpected expense, like having a flooded car or home damage, can be enough to put a family in crisis.

Of the 23,242 cost burdened households (53.1%), approximately 18,638 (80%) of households are renter households, compared to 4,604 (20%) homeowners. Cost burden households are the most pressing housing problem, especially at the lower income levels for renters. With households paying more than 30% or 50% of their income going toward their housing costs, there are little funds remaining to accumulate savings and plan for emergencies. While those without insurance would be particularly affected in a natural disaster, even those with insurance may struggle to come up with the funding needed to cover their deductible. Floods, fires, and tornadoes are natural disasters that may cause a household to temporarily or permanently leave their previous housing. The costs associated with a temporary or permanent move may exceed what insurance covers, including unpaid time off work, increase in food costs, lodging costs, and car rental. A wider availability of affordable housing units may lessen the effects of disasters on low and moderate-income families, whose housing cost burden would be reduced by increased affordability.
2020-2022 CONSOLIDATED PLAN & 2020 ACTION PLAN
... for housing and community development

EXPECTED 3-YEAR FUNDING AMOUNT 2020-2022

- Affordable Housing
- No Hunger
- Good Health and Well-being
- Family Stability
- Special Needs
- Making Homelessness Rare, Brief, and Nonrecurring
- Transportation Access
- Economic Security

STRATEGIC & ACTION PLAN PRIORITIES

<table>
<thead>
<tr>
<th>HOUSEHOLDS</th>
<th>PRIORITY</th>
</tr>
</thead>
<tbody>
<tr>
<td>123</td>
<td>AFFORDABLE HOUSING</td>
</tr>
<tr>
<td>7,560</td>
<td>MAKING HOMELESSNESS RARE, BRIEF, &amp; NONRECURRING</td>
</tr>
<tr>
<td>4,500</td>
<td>PUBLIC SERVICES</td>
</tr>
<tr>
<td>24,000</td>
<td>PUBLIC FACILITIES, IMPROVEMENTS &amp; INFRASTRUCTURE</td>
</tr>
<tr>
<td></td>
<td>PLANNING &amp; ADMINISTRATION</td>
</tr>
</tbody>
</table>

A REPORT FOR THE U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT
Community Development Block Grant (CDBG) Program
HOME Investment Partnerships (HOME)
Strategic Plan

SP-05 Overview

Strategic Plan Overview
The elements in this section provide context for strategic priorities to be addressed with federal City’s Community Development Block Grant (CDBG) and Home Investment Partnerships Program (HOME) grant funds and other leveraged resources over the next three-years under the 2020-2022 Consolidated Plan for Housing and Community Development.

The Strategic Plan provides an outline of what we want to accomplish with the both City general fund and federal grants over the next three years. This Strategic Plan seeks to address the most pressing need among low- and moderate-income residents, namely, housing instability. All other investments, including those directed toward public service programs, infrastructure improvements, public facilities, public safety and economic opportunity programs, are intended to engender the self-sufficiency and mobility that can be the outgrowth of Safe, Liveable, and Family-Friendly Communities.

This section of the Consolidated Plan includes information on the following:

**SP-05** Overview
**SP-10** Geographic Priorities
**SP-25** Priority Needs
**SP-30** Influence of Market Conditions
**SP-35** Anticipated Resources
**SP-40** Institutional Delivery Structure
**SP-45** Goals
**SP-50** Public Housing Accessibility and Involvement
**SP-55** Barriers to affordable housing
**SP-60** Homelessness Strategy
**SP-65** Lead based paint Hazards
**SP-70** Anti-Poverty Strategy
**SP-80** Monitoring

This Consolidated Plan will prioritize projects that meet the following criteria:
- Meet one or more of the established Consolidated Plan Goals for 2020-2022;
- Address and/or mitigate issues identified in the 2020-2022 Fair Housing Plan;
- Leverage the work of other City adopted plans or eligible initiatives.
SP-10 Geographic Priorities – 91.215 (a)(1)

Geographic Area

<table>
<thead>
<tr>
<th>Area Name</th>
<th>Denton City Limits</th>
</tr>
</thead>
<tbody>
<tr>
<td>Area Type</td>
<td>City-Wide</td>
</tr>
</tbody>
</table>

Table 52- Geographic Priority Areas

General Allocation Priorities

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

At present, the City is not implementing any official HUD designated geographic based priority areas such as Neighborhood Revitalization Strategy. The City of Denton’s CDBG and HOME allocations have not been sufficient to allow for the funding of large or extensive housing, economic development or public works projects. Geographic standards do not apply to city-wide housing assistance and public services programs as any City of Denton resident who is income eligible may apply. Public facility and public improvement projects are completed in residential areas meeting HUD’s low to moderate-income standards (Census Tract with 51% or more L/M income residents).

Figure 15 Concentration of Low and Moderate-Income by Block Group
### SP-25 Priority Needs - 91.215(a)(2)

<table>
<thead>
<tr>
<th>Priority Need Name</th>
<th>Affordable Housing</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Priority Level</strong></td>
<td>High</td>
</tr>
<tr>
<td><strong>Population</strong></td>
<td></td>
</tr>
<tr>
<td></td>
<td>Extremely Low</td>
</tr>
<tr>
<td></td>
<td>Low</td>
</tr>
<tr>
<td></td>
<td>Moderate</td>
</tr>
<tr>
<td></td>
<td>Special Populations: Elderly, Disabled, Homeless, Domestic Violence, Veterans</td>
</tr>
<tr>
<td></td>
<td>Housing Choice Voucher and other Subsidized Housing recipients</td>
</tr>
<tr>
<td></td>
<td>All Households – Individuals and Families</td>
</tr>
<tr>
<td><strong>Geographic Areas Affected</strong></td>
<td>City-Wide</td>
</tr>
<tr>
<td><strong>Associated Goals</strong></td>
<td>Repair/Renovation/Rehabilitation of existing units</td>
</tr>
<tr>
<td></td>
<td>Acquisition of existing units</td>
</tr>
<tr>
<td></td>
<td>Production of new units</td>
</tr>
<tr>
<td></td>
<td>Rental assistance</td>
</tr>
<tr>
<td><strong>Description</strong></td>
<td>Support the provision of quality housing by increasing the availability/accessibility of affordable housing. The City will address the priority need by funding activities including: Home Repair Programs; Homebuyer Assistance Programs; new construction of affordable housing; homelessness prevention (non-HOME rental assistance); rapid re-housing; and supportive services.</td>
</tr>
<tr>
<td><strong>Basis for Relative Priority</strong></td>
<td>These allocations are based on needs analyses, the availability of other funds to target needs, the purpose of the Consolidated Plan funds, and the availability of City General Funds to meet a wide variety of needs.</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Priority Need Name</th>
<th>Making Homelessness Rare, Brief and Nonrecurring</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Priority Level</strong></td>
<td>High</td>
</tr>
<tr>
<td><strong>Population</strong></td>
<td>People Experiencing and At-Risk of Homelessness</td>
</tr>
<tr>
<td><strong>Geographic Areas Affected</strong></td>
<td>City-Wide</td>
</tr>
<tr>
<td><strong>Associated Goals</strong></td>
<td>Diversion/Prevention</td>
</tr>
<tr>
<td></td>
<td>Street Outreach</td>
</tr>
<tr>
<td></td>
<td>Emergency Shelter and Transitional Housing</td>
</tr>
<tr>
<td></td>
<td>Permanent Housing: Rapid Re-housing and Permanent Supportive Housing</td>
</tr>
<tr>
<td></td>
<td>Public Services</td>
</tr>
<tr>
<td><strong>Description</strong></td>
<td>The City is providing support for the community’s Collective Impact Project, the Denton County Homelessness Leadership Team that seeks to:</td>
</tr>
<tr>
<td></td>
<td>Increase leadership, collaboration, and engagement, with a focus on providing and promoting collaborative leadership at all levels of government and across all sectors</td>
</tr>
<tr>
<td></td>
<td>Strengthen the housing crisis response system’s capacity to implement and successful interventions to make Homelessness Rare, Brief and Nonrecurring.</td>
</tr>
<tr>
<td></td>
<td>Increase access to housing, by providing emergency, affordable housing and permanent supportive housing.</td>
</tr>
</tbody>
</table>
### Non-Housing Community Development: Public Services

<table>
<thead>
<tr>
<th>Priority Level</th>
<th>High</th>
</tr>
</thead>
<tbody>
<tr>
<td>Population</td>
<td>Extremely Low, Low, Moderate Income households, Individuals, Families with Children, Special Needs Populations: elderly, frail elderly, persons with disabilities (mental, physical, developmental), persons with alcohol or other drug addictions, persons with HIV/AIDS and their families, victims of domestic violence and public housing residents</td>
</tr>
<tr>
<td>Geographic Areas Affected</td>
<td>City-Wide</td>
</tr>
<tr>
<td>Associated Goals</td>
<td>Extremely Low, Low, Moderate Income households, Individuals, Families with Children, Special Needs Populations: elderly, frail elderly, persons with disabilities (mental, physical, developmental), persons with alcohol or other drug addictions, persons with HIV/AIDS and their families, victims of domestic violence and public housing residents</td>
</tr>
<tr>
<td>Description</td>
<td>The City will assist nonprofit organizations in carrying out public service activities assisting low-income persons, children/youth, seniors, persons with disabilities, and persons experiencing or at-risk of homelessness. Services will include but not be limited to 1) housing (emergency, supportive and permanent); 2) food security; 3) health, mental health and behavioral health care; 4) family stability; 5) special needs populations (senior, disabled, victims of domestic violence); 6) making homelessness rare, brief and nonrecurring; 7) transportation access; and 8) economic security.</td>
</tr>
</tbody>
</table>

**Basis for Relative Priority:**
These allocations are based on needs analyses, the availability of other funds to target needs, the purpose of the Consolidated Plan funds, and the availability of City General Funds to meet a wide variety of needs.
<table>
<thead>
<tr>
<th>Priority Need Name</th>
<th>Planning and Administration</th>
</tr>
</thead>
<tbody>
<tr>
<td>Description</td>
<td>Planning, management, and operations related to developing, administering, and carrying out the 2020-2022 Consolidated Plan Strategic Plan and Annual Goals and Objectives.</td>
</tr>
<tr>
<td>Basis for Relative Priority</td>
<td>These allocations are based on needs analyses, the availability of other funds to target needs, the purpose of the Consolidated Plan funds, and the availability of City General Funds to meet a wide variety of needs.</td>
</tr>
</tbody>
</table>

### Narrative

The City’s approach to prioritization of needs identified in the Consolidated Plan were the result of enhance coordination between public and assisted housing providers and private and governmental health, mental health and service agencies by holding public meetings, utilizing public comment periods; gathering community surveys accessible online and in print for citizens and non-profit agencies, through active participating in coalitions and committees, maintaining ongoing consultation with various city departments; and ongoing consultation with housing providers including nonprofits and the Denton Housing Authority.

Should HUD revenues (either annual allocation or program income) exceed the planned amount, the additional resources shall be allocated in accordance with these funding guidelines.
### SP-30 Influence of Market Conditions – 91.215 (b)

#### Influence of Market Conditions

<table>
<thead>
<tr>
<th>Affordable Housing Type</th>
<th>Market Characteristics that will influence the use of funds available for housing type</th>
</tr>
</thead>
<tbody>
<tr>
<td>Tenant Based Rental Assistance (TBRA)</td>
<td>Renters make up a majority in Denton (52%) and renters experience being cost burdened at a significantly higher rate than homeowners. However, market-rate rents in most Denton neighborhoods are higher than Fair Market Rents (FMR) which are currently well below market rents. This limits the ability to use HOME funds for Tenant Based Rental Assistance (TBRA) in areas with rents below FMR. These areas tend to be lower income, lower opportunity neighborhoods with higher concentrations of minority racial and ethnic groups. The City of Denton does not anticipate funding TBRA with HOME. Outside of the use of CDBG and HOME funds, Housing Choice Vouchers administered by DHA will continue to be a critical resource for low-income households.</td>
</tr>
<tr>
<td>TBRA for Non-Homeless Special Needs</td>
<td>Same as Tenant Based Rental Assistance (TBRA) as listed above.</td>
</tr>
<tr>
<td>New Unit Production</td>
<td>DHA wait list has over 2,000 applicants waiting for housing assistance. For the 8,325 households identified in NA-10 (Table 6) who are earning 30% AMI or less, there are only 665 units affordable and no owner units that are affordable as identified in MA-15 (Table 35). There is not sufficient housing in Denton for low-to moderate-income households especially for households earning between 0% and 30% AMI. In July of 2020, the City will complete an Affordable Housing Assessment which will help the City establish goals for new unit production over the next 5-10 years and support the development of CDBG Neighborhood Revitalization Strategies. Outside of the use of CDBG and HOME funds, the Low-Income Housing Tax Credit Program developments support the production of new rental units provided at affordable rents. The City will work with developers seeking to apply the Texas Department of Housing and Community Affairs (TDHCA) for this program.</td>
</tr>
<tr>
<td>Rehabilitation</td>
<td>The rising cost of construction materials and labor affects the entire housing market. Low-income homeowners and owners of assisted low-income housing have limited resources and rental income to finance necessary repairs. Higher cost can increase the need for City assistance with home repair assistance. Aging housing stock and cost-burdened owners makes home maintenance and rehabilitation unaffordable. For low-income homeowners, the City will offer home repair grants those who are living in dangerous or deteriorating situations to bring their homes up to code, improve the energy efficiency and/or improve access for the disabled persons through repair programs. Other Ideas for consideration:</td>
</tr>
</tbody>
</table>
1. Funding for improvements to existing low-income rental housing, with a goal of reinvestment in at least xx units by July 2023.
2. Housing renovation in the private market is often associated with rising rents and potential displacement of existing lower income residents. In response, the City is making rehabilitation funds available to private market owners who will retain a portion of the units at affordable rents when buildings are upgraded and therefore prevent displacement of low income tenants.

<table>
<thead>
<tr>
<th>Acquisition, including preservation</th>
<th>Market Analysis indicates that there are not sufficient affordable housing units available to especially to those in the 0-30% and 30-50% income ranges. Renters are cost burdened and for those interested in home ownership, home prices exceed these household’s ability to afford a qualified mortgage.</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>1. For low-income homebuyers, the City will support a Homebuyers Assistance Program.</td>
</tr>
<tr>
<td></td>
<td>2. For Community Housing Development Organizations (CHDO), Community Development Organizations (CDC), and other nonprofit housing developers, the City will support acquisition of properties such as vacant homes and land for the preservation of existing to prevent displacement of low income tenants or construction of new affordable single family and multi-family units as part of an overall neighborhood revitalization strategy.</td>
</tr>
</tbody>
</table>

Table 54 – Influence of Market Conditions
SP-35 Anticipated Resources - 91.215(a)(4), 91.220(c)(1,2)

Introduction
Overall resources in 2020 from the Consolidated Plan funds are expected to remain substantially like recent years. The City of Denton coordinates HUD’s Consolidated Plan funds with other City resources such as our General Fund, HUD funding through the State Entitlement, and other funding to provide for human services, affordable housing, and community and economic development. Not all of the needs identified in the Consolidated Plan are addressed with HUD funds. How each fund source is used depends upon the various restrictions and regulations covering the funds and the most efficient and effective mix of funds.

Anticipated Resources

<table>
<thead>
<tr>
<th>Program</th>
<th>Source of Funds</th>
<th>Uses of Funds</th>
<th>Expected Amount Available Year 1</th>
<th>Narrative Description</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td></td>
<td>Annual Allocation: $</td>
<td>Program Income: $</td>
</tr>
<tr>
<td>CDBG</td>
<td>Federal</td>
<td>▪ Administration ▪ Housing Rehabilitation ▪ Homebuyer Assistance ▪ Public Improvements ▪ Public Facility Improvements ▪ Public Services</td>
<td>$1,051,794</td>
<td>$8,000</td>
</tr>
<tr>
<td>HOME</td>
<td>Federal</td>
<td>▪ Administration ▪ Homebuyer Assistance ▪ Housing Reconstruction ▪ CHDO Operating ▪ Rental Rehabilitation ▪ Acquisition/Rehab</td>
<td>$505,355</td>
<td>$80,000</td>
</tr>
<tr>
<td>CBDG-CV</td>
<td>Federal</td>
<td></td>
<td>$618,736</td>
<td></td>
</tr>
</tbody>
</table>

Table 55 - Anticipated Resources
Explain how federal funds will leverage those additional resources (private, state and local funds), including a description of how matching requirements will be satisfied.

The City of Denton has consistently provided a significant amount of general funds to support Community Development activities. In addition to administrative costs for 50% of Community Development staff, the City provides more public services funding than what the CDBG regulations allow the entitlements to utilize (15% cap) which allows more funding to be spent on projects and programs.

These additional public services funds are used to meet the needs described in the Consolidated Plan. Some of the other ways in which CDBG and HOME funds are leveraged include the following:

- Federal, State, Local and provide funds raised by local non-profit organizations are used for service delivery and facility improvements that are partially funded through CDBG;
- Housing funds usually obtained from a lender or State grant opportunities, are used by the Denton Affordable Housing Corporation to maintain and/or make available additional affordable housing units;
- Use of City funds and personnel to provide additional support for public facility project
- Permanent mortgage loans obtained by homebuyers participating in the City’s Homebuyer Assistance Program. These are provided through local lending institutions.

The HOME program requires a participating jurisdiction to provide a 25% match of the federal HOME funds. The 25% match of federal HOME grant excludes administrative allowances of 10% and CHDO operating expenses. The City of Denton uses match from a variety of non-federal cash contributions including the following:

- Residual balance of match from prior years.
- Local and state funding provided to Denton Affordable Housing Corporation on eligible HOME projects, such as funds from the Federal Home Loan Bank, Denton County Housing Finance Corporation, and Texas Department of Housing and Community Affairs.
- General Funds provided on eligible HOME projects through the Affordable Housing Fee Grant Program.

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

Not applicable

Discussion: Not applicable
SP-40 Institutional Delivery Structure – 91.215(k)

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

<table>
<thead>
<tr>
<th>Responsible Entity</th>
<th>Responsible Entity Type</th>
<th>Role</th>
<th>Geographic Area Served</th>
</tr>
</thead>
<tbody>
<tr>
<td>City of Denton Community Development</td>
<td>Government Department</td>
<td>CDBG and HOME Housing, public services and public and non-profit facility improvements.</td>
<td>City of Denton</td>
</tr>
<tr>
<td>Denton Housing Authority</td>
<td>PHA</td>
<td>Housing Choice Voucher, Develops Public Facility Corporations to develop affordable multi-family</td>
<td>City of Denton</td>
</tr>
<tr>
<td>Denton County Public Health Department</td>
<td>Government</td>
<td>ConPlan - Community Needs Assessment Healthy Communities Coalition</td>
<td>Denton County</td>
</tr>
<tr>
<td>Texas Dept. of Housing &amp; Community Affairs</td>
<td>Government Department</td>
<td>Housing, Homelessness and Homeless At-Risk</td>
<td>State</td>
</tr>
<tr>
<td>Texas Homeless Network</td>
<td>Continuum of Care</td>
<td>ConPlan Consultation CoC Grant Homelessness</td>
<td>Balance of State Texas</td>
</tr>
<tr>
<td>Denton County Transportation Authority</td>
<td>Public Institution</td>
<td>Provision of public</td>
<td>Denton County</td>
</tr>
<tr>
<td>Housing Assistance Providers</td>
<td>Non-Profit Organizations</td>
<td>ConPlan Consultation Agencies such as the Denton Affordable Housing Corp. (DAHC), Habitat for Humanity and Cumberland Presbyterian Children’s Home provide a variety of housing programs.</td>
<td>Denton County</td>
</tr>
<tr>
<td>Non-profit public service agencies</td>
<td>Non-Profit Organizations</td>
<td>ConPlan Consultation Provide housing and public services assistance to households</td>
<td>City of Denton, Denton County</td>
</tr>
<tr>
<td>Local Realtors</td>
<td>Private Industry</td>
<td>Participate in the City’s Homebuyer Assistance Program</td>
<td>City of Denton</td>
</tr>
<tr>
<td>Contractors</td>
<td>Private Industry</td>
<td>Participates rehabilitation and new construction of housing and public facilities projects funded by the City</td>
<td>City of Denton</td>
</tr>
</tbody>
</table>

Table 56 - Institutional Delivery Structure
Assess of Strengths and Gaps in the Institutional Delivery System

The City of Denton and Denton County have a strong base of public and private service providers including local nonprofit agencies, governmental entities, churches, and the educational system. These entities strengthen our ability to meet the purposes of the federal grants governed by this Consolidated Plan and to leverage resources outside the scope of the Consolidated Plan. The City of Denton’s housing and community development offers a diversity of public benefits and support service systems. Strong public-private partnerships in the areas of Behavioral Health and Homelessness also demonstrates the success of the City’s commitment to coordination of efforts resulting in systems improvement.

However, resources are not balanced. There are limits to structural resources in different parts of the system creating “institutional” gaps. The depth of need in these complex societal issues presents an ongoing challenge to the multiple stakeholders, multiple administrative structures, and the complexity inherent in these institutional delivery systems. In addition to institutional gaps, there are financial gaps. Though entities exist to provide much-needed services, funding is not always available to support the scope of services.

For a complete listing of consulting partners, plans integrated into the work of the Consolidated Plan with internal agencies, external agencies, and city departments that are part of our delivery system, please review Table above and PR-10 and PR-15 of this report.

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

<table>
<thead>
<tr>
<th>Homelessness Prevention Services</th>
<th>Available in the Community</th>
<th>Targeted to Homeless</th>
<th>Targeted to People with HIV</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Homelessness Prevention Services</strong></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Counseling/Advocacy</td>
<td>X</td>
<td>X</td>
<td>X</td>
</tr>
<tr>
<td>Legal Assistance</td>
<td>X</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Mortgage Assistance</td>
<td>X</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Rental Assistance</td>
<td>X</td>
<td>X</td>
<td>X</td>
</tr>
<tr>
<td>Utilities Assistance</td>
<td>X</td>
<td>X</td>
<td>X</td>
</tr>
<tr>
<td><strong>Street Outreach Services</strong></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Law Enforcement</td>
<td>X</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Mobile Clinics</td>
<td>X</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Other Street Outreach Services</td>
<td>X</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
**Supportive Services**

<table>
<thead>
<tr>
<th>Service</th>
<th>X</th>
<th></th>
<th>X</th>
</tr>
</thead>
<tbody>
<tr>
<td>Alcohol &amp; Drug Abuse</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Child Care</td>
<td>X</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Education</td>
<td></td>
<td>X</td>
<td></td>
</tr>
<tr>
<td>Employment and Employment Training</td>
<td>X</td>
<td></td>
<td>X</td>
</tr>
<tr>
<td>Healthcare</td>
<td></td>
<td>X</td>
<td></td>
</tr>
<tr>
<td>HIV/AIDS</td>
<td>X</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Life Skills</td>
<td>X</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Mental Health Counseling</td>
<td>X</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Transportation</td>
<td></td>
<td>X</td>
<td></td>
</tr>
</tbody>
</table>

**Table 57 - Homeless Prevention Services Summary**

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

Please see responses provided in NA-40, NA-45, MA-30, MA-35, MA-40, MA-45, and MA-50. Our current housing crisis response system is operationally proficient, but it struggles with sufficient resources to meet increasing demand for services by these populations.

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

Please also see responses provided above under, “Assess of Strengths and Gaps in the Institutional Delivery System”. The issues are the same for other special populations.

**Strengths:**

- *Collective Impact* collaborations: Denton County Homelessness Leadership Team, Denton County Behavioral Health Leadership Team
- Coordination across service sectors for supportive services
- Advocacy and awareness of special needs populations and persons experiencing homelessness in the community is improving
- Supportive services and programs exist that address the variety of service needs
- Nimble system that can successfully navigate change and implement new learning and innovations
Gaps:

- Limited capacity to meet the demand in existing Emergency Shelters.
- Limited capacity to meet the demand in supportive services programs especially mental and behavioral health (substance abuse) resources.
- Limited capacity at the agency level to collect data to demonstrate system-wide impact and outcome.
- Limited supply of affordable housing that is below HUD FMR which limits the number of clients who can be served with rental assistance using federal grant dollars.
- Limited supply of supportive housing units and funding to meet the overall needs in the community specifically for those who are chronically homeless in need of permanent supportive housing and literal homeless needing diversion and rapid rehousing assistance.
- Limited rental assistance funding to move people staying in temporary and emergency shelters to permanent housing solutions.
- Limited discharge planning by health care and behavioral health institutions to address the ongoing case management needs and meet the housing and supportive services needs for those with chronic health and mental health issues leaving these institutions. Instead there is an over reliance on Emergency Shelters to serve these needs.
- Public Transportation hours and coverage are not expanded to provide transportation for those who work non-business hours which limits the ability to successfully obtain and maintain employment.

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

To the extent that “gaps” in the institutional structure and service system are driven by increasing demand for housing, community development, and public services the City will continue to seek increased operating and services funding.

Summary of Strategies:

- Develop and maintain a coordination system across service sectors and cultivation of systems to better match services to identified need;
- Identifying and continuously evaluating the strengths and gaps in housing and supportive services including improving systems to share best practices information across service sectors;
- Collect and utilize data that informs system-wide based decision making for prioritizing and selecting high performing projects.
### SP-45 Goals Summary – 91.215(a)(4)

#### Goals Summary Information

<table>
<thead>
<tr>
<th>Sort Order</th>
<th>Goal Name</th>
<th>Start Year</th>
<th>End Year</th>
<th>Category</th>
<th>Geographic Area</th>
<th>Needs Addressed</th>
<th>Funding</th>
<th>Goal Outcome Indicator</th>
</tr>
</thead>
</table>
| 1          | Affordable Housing | 2020 | 2022 | Affordable Housing | Denton City Limits | • Repair/Renovation/Rehabilitation of existing units  
• Acquisition of existing units  
• Production of new units | CDBG HOME | # Units:  
• Repaired, Renovated Rehabilitated  
• Acquired  
• Produced |
| 2          | Making Homelessness Rare, Brief and Nonrecurring | 2020 | 2022 | Homelessness | Denton City Limits | • Diversion/Prevention  
• Street Outreach  
• Emergency Shelter and Transitional Housing  
• Permanent Housing  
• Public Services | CDBG General Fund | #/% Households:  
• Evictions Prevented  
• Moved from Unsheltered to Sheltered  
• Exit shelter to PH, RRH, PSH  
• Assisted w/ Services |
| 3          | Public Services | 2020 | 2022 | Non-Housing Community Development | Denton City Limits | • Extremely Low, Low, Moderate Income households  
• Individuals  
• Families with Children  
• Special Needs Populations | CDBG General Fund | #/% Households assisted w/:  
• housing  
• food security;  
• health, mental and behavioral health;  
• family stability;  
• special needs populations;  
• homelessness, at-risk;  
• transportation access; and  
• economic security. |
| 4          | Public Facilities, Public Improvements and Infrastructure | 2020 | 2022 | Non-Housing Community Development | Denton City Limits | • Public Facilities  
• Public Improvements and Infrastructure | CDBG | #/% Households who benefit:  
Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit |

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Table 58 – Goals Summary

Consolidated Plan DENTON 105

OMB Control No: 2506-0117 (exp. 06/30/2018)
Goal Descriptions

For Federal CDBG/HOME assisted activities only Community Development estimates that 36,183 eligible households* will be assisted in the priority areas as described below.

**Goal 1 – Affordable Housing – 123 households**
Support the provision of quality housing by increasing the availability/accessibility of affordable housing. The City will address the priority need by funding activities including: Home Repair Programs (34/yr); Homebuyer Assistance Programs (4/yr); CHDO Rental Rehabilitation (3/yr); new construction of affordable housing; homelessness prevention (non-HOME rental assistance); rapid re-housing; and supportive services.

**Goal 2 – Making Homelessness Rare, Brief and Nonrecurring – 7,560 households**
The City is providing support for the community’s Collective Impact Project, the Denton County Homelessness Leadership Team that seeks to Increase leadership, collaboration, and engagement, with a focus on providing and promoting collaborative leadership at all levels of government and across all sectors; Strengthen the housing crisis response system’s capacity to implement and successful interventions to make Homelessness Rare, Brief and Nonrecurring; Increase access to housing, by providing emergency, affordable housing and permanent supportive housing; and Increase economic security, by improving access to education and increasing meaningful and sustainable employment and improving access to mainstream programs and services to reduce financial vulnerability to homelessness (2,520/yr).

**Goal 3 – Public Services – 4,500 households**
The City will assist nonprofit organizations in carrying out public service activities assisting low-income persons, children/youth, seniors, persons with disabilities, and persons experiencing or at-risk of homelessness (1,500/yr). Services will include but not be limited to 1) housing (emergency, supportive and permanent); 2) food security; 3) health, mental health and behavioral health care; 4) family stability; 5) special needs populations (senior, disabled, victims of domestic violence); 6) making homelessness rare, brief and nonrecurring; 7) transportation access; and 8) economic security.

**Goal 4 – Public Facilities, Public Improvements and Infrastructure – 24,000 households**
Provides funding for public facility and infrastructure improvements. Public facility projects benefit LMI persons by creating/improving public services facilities such as ADA accessibility and increasing public service locations. Infrastructure improvement projects benefit LMI neighborhoods by improving existing infrastructure such as street improvements; installation of new sidewalk, water and sewer lines, and drainage improvements; improving and expanding park and recreational facilities.
*households may include individual households and family households.

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

During the implementation of the Strategic Plan, the City anticipates CDBG/HOME funds to assist with affordable housing including rental rehabilitation, homeownership, housing rehabilitation and reconstruction over the three-year period. Investment of HOME funds may also be leveraged to foster partnerships that increase investment of non-federal funds in the production of affordable housing for all income categories.

Community Development estimates that 123 LMI households will be assisted at CDBG/HOME income eligibility levels:

- Extremely Low-Income 0-30 percent of AMI
- Low-Income 31-50 percent of AMI
- Moderate-Income 51-80 percent of AMI
SP-50 Public Housing Accessibility and Involvement – 91.215(c)

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

Not Applicable – the Denton Housing Authority does not administer public housing

Activities to Increase Resident Involvements

Not applicable.

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

Not applicable.

Plan to remove the ‘troubled’ designation

Not applicable.
SP-55 Barriers to affordable housing – 91.215(h)

Barriers to Affordable Housing

From MA-40. Generally, barriers to the development of affordable housing are the factors that increase the cost of housing development. These can include:

- **Development Policy**: Through zoning ordinances, permit systems, and housing codes and building standards, the City has attempted to ensure the health, safety, and quality of life of its residents while minimizing the barriers that may impede the development of affordable housing. None of these measures is intended to restrict the affordability of housing, though these regulations may on occasion affect the development costs of housing.

- **Market constraints**: These include the availability, cost, and competition for land/existing inventory of housing units as compared to demand. Competition adds cost to a project and will affect the development costs of housing.

- **Access and Cost of Capital**: These are the constraints of limited funding sources, finance costs, and the costs of construction. Limited access to capital through lending reduces the number of projects that can be completed which will restrict supply. Higher financing costs and costs of materials and workers affect the development costs of housing.

Denton’s Planning and Development staff have reviewed the City’s building/property codes, zoning, impact fees, and other requirements affecting the development of housing in the community. Community Development staff has also reviewed information on the number of affordable units in the city, the number of Denton Housing Authority voucher holders that live in Denton, projects completed by the Denton Affordable Housing Corporation, and the number of low income housing tax credit units funded through the State that have been built or renovated in the city.

Barriers to accessing affordable housing are factors that include household income and housing cost. The Housing Needs Assessment addressed the factors of income and housing costs. In addition, there are lending and foreclosure practices, which are outside the scope and control of City policy. There are other barriers associated with poverty such as personal finances (lack of down payment, credit history, employment history) that affect the access and availability of affordable housing for residents.
Strategy to Remove or Ameliorate the Barriers to Affordable Housing

Details regarding the actions committed to remove or ameliorate the Barriers to Affordable Housing Responses are reflected in the City’s Fair Housing Plan and Analysis of Impediments (FHP-AI) in ATTACHMENT 2 as a part of this 2020-2022 Consolidated Plan.

The work plan includes 6 separate goals with proposed actions that are intended to remove or ameliorate barriers to affordable housing:

- Increase access to affordable housing in high-opportunity areas;
- Increase supply of affordable housing units;
- Increase supply of accessible, affordable housing for persons with disabilities;
- Make investments in targeted neighborhoods to improve access to opportunity;
- Increase access to information and resources on fair and affordable housing; and
- Increase supports and services for residents with housing assistance.
SP-60 Homelessness Strategy – 91.215(d)

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

The community must identify and continually engage all sheltered and unsheltered persons who are currently experiencing homelessness including those who are in jeopardy of experiencing chronic homelessness.

Increase Street Outreach efforts to connect with people experiencing homelessness living unsheltered. Annually, the City participates in the Point-In-time (PIT) Count to reach out and assess the needs of persons experiencing homelessness. City staff help coordinate the annual PIT Count and will continue to support the annual count by participating in the coordination and implementation of future counts. In addition, the City supports Street Outreach (SO) and Coordinated Entry (CE) programs through grants and staff human resources. To directly reach out to sheltered and unsheltered homeless persons partners complete street outreach in collaboration with city general funded nonprofit partner Our Daily Bread (ODB). General funds in the amount of $64,600 are allocated to Our Daily Bread (ODB) for SO. ODB, the Denton Police Department’s Homeless Outreach Officers, and other service providers make up the Homeless Outreach Team (H.O.T.). H.O.T. provides SO case management delivered directly to the unsheltered homeless. All SO clients are assessed for needs and effort is made to get intakes entered into HMIS and a CE assessment completed.

Efforts are also coordinated with partners through the housing crisis response system. Denton County Friends of the Family (DCFOF), Monsignor King Outreach Center (MKOC), ODB, and The Salvation Army (TSA) Case Managers are reaching out to clients receiving emergency shelter and supportive services like food and with crisis hotlines. DCFOF's Crisis Line staff and Community Educators reach out daily to persons experiencing homelessness and those at-risk who are victims of domestic violence. DCFOF Community Educators and TSA Coordinators lead outreach efforts at community events to educate the community about available services.

Addressing the emergency and transitional housing needs of homeless persons

Investment in SO, ES, TH, and RRH programs aims shorten the length of time people experience homelessness and increase the number of people experiencing homelessness who are transitioned from unsheltered to transitional and permanent housing. The programs are a part of a coordinated housing focused strategy. Through this targeted housing focused case
management that supports a stable transition to independent living, emergency and transitional housing provides much needed stability when a permanent housing solution is not available.

**Increase the number of short-term supportive and long-term permanent affordable housing units for both individuals and families with children.** The City of Denton addresses the emergency shelter (ES) and transitional housing (TH) needs of persons experiencing homelessness through the City’s general fund; Community Development Block Grant (CDBG) funds; supporting partner agencies using Emergency Solutions Grant (ESG) Funds awarded through the Texas Department of Housing and Community Affairs (TDHCA) and dedicated human resources. Specifically, $450,000 in general funds have been allocated to Monsignor King Outreach Center (MKOC) and $40,000 in CDBG funds for Denton County Friends of the Family (DCFOF) for ES.

The strategy requires strong collaboration through shared data gathering. The community partners enter data in HMIS, HMIS data are analyzed, Coordinated Entry (CE) assessments prioritize housing needs, and the Housing Priority List (HPL) is generated. The data are accessible by the public through the [Homeless Data Dashboard](#). The City provides $80,000 in general funds to support Homelessness Initiatives, HMIS, and CE in FY2020-21. We are able to assess the ES, Diversion (including HP), RRH, and PSH needs through: performance reporting by service providers; the annual PIT Count; CE’s shared assessment tool, the VI-SPDAT; and the HPL. For example, under ODB’s SO, and Supportive Services clients are assessed for housing needs and Case Managers’ at MKOC, Intake Coordinators at DCFOF, and Case Managers TSA are assessing needs of the shelter clients during intake, CE assessments, and through on-going case management. The CE process and HPL provide immediate assessment of needs and referral to housing. These provide key data for the community to complete a comprehensive analysis of the housing crisis response system to identify needs, gaps in housing needed and to use data to inform housing, programming and funding decisions.

**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 system approach discussed throughout SP-60 connects with City funded activities such as general funded RRH awarded to ODB and MMOC.
Increase funding for Rapid Re-Housing for families and individuals including housing location and stabilization resources. General funds in the amount of $67,100 to ODB and $60,000 to MKOC have been allocated for rapid rehousing (RRH). Other community partners have picked up support of ES and TH programs like Grace Like Rain’s Wheeler House program. Denton County Friends of the Family receives other federal funding for transitional housing, so the City is better able to leverage its resources on the gaps and ensure the ES and TH needs of homeless persons are addressed.

Increase specialized housing for those in Permanent Supportive Housing (PSH) for those with prioritized special needs. Evidenced based practice supports providing housing assistance programs that combine the financial housing assistance, case management, and supportive services to help persons experiencing homelessness transition to permanent housing and independent living.

Making the transition to permanent housing and independent living. The primary goal is to maximize the implementation of Coordinated Entry (CE) system through which persons experiencing homelessness are assessed for their housing needs, prioritized and referred to the most appropriate housing intervention available through the Housing Priority List (HPL). The HPL provides key data for the community to complete a comprehensive analysis of the housing crisis response system to identify important system performance measures like the number of homeless, length of homelessness, first-time homeless and returns to homelessness as well as reducing housing barriers and increasing income. This data informs housing, programming and funding decisions. As stated earlier, the City provides $80,000 in general funds to support Homelessness Initiatives, HMIS, and CE in FY2020-21. Other HUD CoC programs such as Giving Hope, Inc’s CoC PSH and Denton County MHMR’s CoC PSH programs utilize the system by using CE, participating in case conferencing and pulling people from the HPL as housing units and funding for housing assistance is available.

Shortening the length time that individuals and families experience homelessness. The CE system is specifically designed to reduce the time that it takes for a person who is homeless to have housing needs identified and referred to the right housing option. CE means that all agencies are using the same assessment identifying housing need and then placing people on the single shared HPL. Street outreach refers to one of the local shelters, DCFOF, MKOC, and TSA or housing program which directly connects with referral to a housing assistance program like ES, TH, RRH, PSH programs; and the Denton Housing Authority for housing choice voucher assistance. When the next unit is available these providers, pull people from the HPL based on most critical prioritized need first. This is combined with housing stability case management for a swift transition to independent living.
Facilitating Access. To reach more vulnerable populations experiencing homelessness, having sufficient housing options will be a key to ensure every person in need has a choice for housing regardless of their current circumstance. As a compliment to the housing crisis response system, the community has implemented a landlord engagement program with a Housing Navigator piloted with general funds in 2019 to increase the awareness of landlords about homeless prevention programs and increase the number of landlords willing to lower barriers to housing such as income below landlord requirements, past evictions, criminal convictions, poor credit history, and accept homeless households. The City funds $40,000 to the Barriers Fund to help reduce those housing barriers. Finally, the City has implemented a utility deposit waiver program for persons experiencing homelessness that helps to lower a barrier to housing.

Because we want to prevent individuals and families who were recently homeless from becoming homeless again and do not want clients in supportive housing programs to exit to homelessness or return to homelessness, clients in SO, ES, TH, RRH, and PSH programs should receive housing stability case management: education/employment assistance, life skills, transportation, financial empowerment, and applying for government benefits and support.

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

The most effective tool for assisting low-income individuals and families to avoid becoming homeless is to ensure there are housing assistance resources to prevent individuals and families at-risk from becoming homeless in the first place. Implementing coordinated homelessness prevention strategies will require increased funding and using existing funding more efficiently including investment in housing stabilization resources; case management; and supportive services needed to help maintain housing.

Increase funding for Diversion (rapid resolution for diverting people from homelessness quickly). The City awards $40,000 from the general fund to the Barriers Fund to help reduce housing barriers. These funds include support for Diversion to prevent homelessness or divert people from homelessness quickly. Interfaith is awarded $125,000 annually in general funds from the City that assist families with utilities, thus reducing housing instability.

For those who are likely to become homeless after being discharged from a publicly funded institution or system of care, the City allocates general funds for HMIS and CE. In alignment with
the BoS CoC recommendations for CE, part of that strategy is a communication plan for educating the public on how to referral into the CE system which include building working relationships with institutions and systems of care such as health-care facilities, mental health facilities, foster care or other youth facilities, corrections programs and institutions and receiving assistance from public or private agencies that address housing, health, social services, employment, education or youth needs to ensure timely referrals to avoid a person becoming homeless upon discharge. There is currently an overreliance on shelters by private mental health facilities providers and hospitals who use the shelters to discharge patients without housing. This creates a significant burden on shelters with limited bed capacity and shelter staff who do not have the expertise to manage mental or physical health concerns of those recently exited from a health care facility. Ongoing outreach to these facilities and active participation by these institutions is needed to identify solutions that reduce people being discharged to homelessness.

Shelters work to avoid discharging clients back into homelessness. Denton County Friends of the Family (DCFOF), Monsignor King Outreach Center(MKOC), and The Salvation Army Denton (TSA) in collaboration with PSH housing providers like GH and DCMHMR will extend shelter stays for shelter residents referred for housing assistance to allow more time to secure housing, employment, education, and other needs that help to overcome barriers to housing. Often sheltered individuals must wait extra time when requesting rapid rehousing funds or pending property readiness for housing.
**SP-65 Lead based paint Hazards – 91.215(i)**

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

The City recognizes the need to decrease the level of lead-based paint hazards in residential units improved with City or federal funds. Lead-based paint hazard is defined as any condition that causes exposure to lead from lead-contaminated dust, lead-contaminated soil, or lead-contaminated paint that is deteriorated or present in accessible surfaces, friction surfaces, or impact surfaces that would result in adverse human health effects as established by the appropriate federal agency.

All projects assisted through the City of Denton Community Development Division will comply with the HUD Lead Safe Housing Rule, 24 CFR 35, subparts B through R and the State of Texas §295.201-220 Texas Environmental Lead Reduction Rules for units built before 1978. The City of Denton has a staff person who is a state certified lead risk assessor and a certified lead abatement project designer. The City utilizes a certified lab for soil and dust sample testing.

The City of Denton will reduce Lead-Based Paint Hazards in owner and renter-occupied residential units receiving federal funding to support activities and programs. The City actions will be:

- Ensure that all regulatory requirements regarding lead-based paint are met throughout any housing rehabilitation construction activity performed by the City on homes constructed prior to 1978.
- Seek opportunities to educate the public, housing services customers, and affordable housing partners, and contractors regarding the hazards of lead-based paint.

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

Based on the age of housing stock in Denton, an estimated 10,163 residential units could have lead-based paint risks (MA-20). These risks are mitigated through efforts to build awareness and continued availability of the home repair programs which requires testing of all homes built before 1978 for lead based paint.

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

The City’s approach to lead hazard evaluation and reduction is included in all the City’s policies and procedures governing each federally-assisted housing program that is subject to the Lead Safe Housing Rule or policies for specific projects such as the minor repair, owner-occupied
rehabilitation, and down payment assistance. The City also incorporates the requirements of 24 CFR Part 35 in written agreements with subrecipients, developers, and contractors, where applicable.

The City distributes information on lead-based paint hazards, precautions and symptoms, including the U.S. Environmental Protection Agency’s (EPA) pamphlet, *Protect Your Family From Lead In Your Home* to all homeowners involved in housing programs. In addition, when pre-1978 housing is involved as part of a City or CDBG-funded organizations housing program, the City/Organization will test the housing for lead-based paint hazards, provide a risk assessment, and conduct mitigation as warranted.

Lead hazard information is also available on the City’s web page.
SP-70 Anti-Poverty Strategy – 91.215(j)

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

During the period covered by this Consolidated Plan, the City will select projects for funding that are designed to reduce the number of persons in poverty by improving opportunity by increasing affordability and access. Community Development will also collaborate with other City departments and local organizations that operate programs that similarly have a goal of reducing the poverty level in the City.

There are eight key focus areas that impact the conditions of poverty in Denton including:

1. **Affordable Housing** – The preservation and creation of quality affordable and supportive housing;
2. **No Hunger** – Reducing food insecurity;
3. **Good Health and Well-being** – Increasing availability and access to Health, Mental Health, and Behavioral Health Care;
4. **Family Stability** – Improving safety, support and opportunity including access to affordable childcare;
5. **Special Needs** – Increasing availability and access to services meeting the special needs of vulnerable populations such as seniors, disabled, veterans, abused and neglected children, and victims of domestic violence;
6. **Making Homelessness Rare, Brief, and Nonrecurring**;
7. **Transportation access** – increasing housing and workforce stability by increasing access to transportation resources; and
8. **Economic Security** – improving income mobility, educational attainment, and workforce development;

Actions that the City may support, as funding allows, through City or CDBG-funded organizations include:

1. Affordable housing assistance programs:
   a. Implement or provide grants for Preserving Affordable housing through Repair, Renovation, Reconstruction, and Rental Rehabilitation projects
   b. Development Fee Grant to support the creation of Affordable Housing units
   c. Public Services Grants for utility assistance programs that increase housing Stability and prevent homelessness
   d. Public Services Grants for rental assistance increase Housing Stability and prevent homelessness
   e. Completion of a City general funded Affordable Housing Assessment
2. Public Services, Facility, and/or Infrastructure Grants to combat Food Insecurity;
3. Public Services, Facility, and/or Infrastructure Grants to increase availability and access to Health, Mental Health, and Behavioral Health Care;
4. Public Services, Facility, and/or Infrastructure Grants to improve Family Stability by improving safety, support, and opportunity including access to affordable childcare;
5. Public Services, Facility, and/or Infrastructure Grants to increase availability and access to services for special needs populations (seniors, disabled, veterans, abused and neglected children, and victims of domestic violence);
6. Public Services, Facility and/or Infrastructure Grants to make homelessness rare, brief, and nonrecurring;
7. Intergovernmental collaboration and Public Services, Facility and/or Infrastructure Grants to increase access to Transportation increasing housing and workforce stability; and
8. Public Services Grants to increase access to mobility, educational programs, and workforce development for Economic security.

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

Finally, the ConPlan integrates the FHP-AI work plan. The work plan includes 6 separate goals with proposed actions that are intended to:

- Increase access to affordable housing in high-opportunity areas;
- Increase supply of affordable housing units;
- Increase supply of accessible, affordable housing for persons with disabilities;
- Make investments in targeted neighborhoods to improve access to opportunity;
- Increase access to information and resources on fair and affordable housing; and
- Increase supports and services for residents with housing assistance.

As discussed above, the projects for funding consideration that are designed to reduce the number of persons in poverty by improving opportunity by increasing affordability and access will support the goals. Details regarding the actions committed to poverty reducing goals, programs, and policies coordinated with this affordable housing plan are reflected in the City’s Fair Housing Plan and Analysis of Impediments (FHP-AI) in ATTACHMENT 2 as a part of this 2020-2022 Consolidated Plan.
SP-80 Monitoring – 91.230

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

Community Development continuously monitors programs and projects to ensure compliance with federal statutes and regulations. Staff focuses on the following areas: environmental, displacement, labor standards, financial, programmatic, subrecipients, and community housing development organizations (CHDO).

**Environmental.** Environmental standards and procedures have been developed that include completion of the local Environmental Review Record (ERR) and compliance checklists for individual housing activities. The annual ERR is developed annually. Program staff administering City housing assistance programs are responsible for environmental compliance on specific projects.

**Displacement.** The City of Denton makes every effort to minimize displacement in all CDBG and HOME funded activities by meeting the URA or Section 104(d) Act of 1974. Acquisition, rehabilitation or demolition programs are designed not to displace households, businesses, farms or nonprofit organizations. No households have been displaced since the inception of Denton’s CDBG program in 1985.

**Labor Standards.** Program staff monitors labor standards on capital improvement projects. A preconstruction conference is held to provide contractors with payroll, wage and hiring requirements. Contractor payments are contingent upon payment of the proper wages and receipt of appropriate payroll records.

**Financial.** Financial monitoring has oversight from multiple departments to ensure adequate checks and balances. A grants accountant with the City’s Accounting Department works with the community development coordinator in Community Development. Drawdown of federal funds is not carried out until all records have been reconciled and approved by both departments. The Purchasing/Materials Management Department assists with purchases and the bidding process to ensure compliance with state and federal regulations. An independent accounting firm audits Community Development financial operation annually.
**Programmatic.** The Community Development staff carries out regular programmatic monitoring of City-administered programs. Project specific checklists are used to ensure that all compliance requirements are met. The program administrator reviews the file and approves all payments.

**Subrecipients.** Program staff monitoring subrecipient performance. Monitoring is a systematic process of review and evaluation of compliance with Service Agreement terms, conditions and policies. Monitoring is a valuable tool to:

1. ensure funds are used in appropriately avoiding fraud, waste, and mismanagement,
2. improve performance, attain self-sufficiency, and increase management capabilities,
3. provide a continuous process for evaluation and improvement, and
4. develop a strong working relationship between the City and community organizations.

Monitoring is based on risk analysis to determine what level of monitoring visits will be required. The process provides staff with consistent data to develop monitoring strategies to manage the risk and helps determine which agencies are to be monitored and the type of monitoring performed.

Multiple methods are used to monitor agency service performance and agreement compliance. These includes desk monitoring of documents submitted monthly by agencies including reports, requests for reimbursement, financials and governance documents; informal monitoring involving routine record requests by email, phone, and letter; formal monitoring evaluation involving telephone interviews and required meetings; and an expanded monitoring evaluation system most frequently administered on-site.

**CHDO.** Staff monitor the City’s CHDO, Denton Affordable Housing Corporation (DAHC) for compliance of CHDO projects. Staff monitors compliance on an annual basis. CHODO’s are also required to submit quarterly financial and beneficiary reports. Project monitoring occurs as projects are awarded. The City monitors the project’s through completion including inspections of HOME assisted units to ensure compliance with City of Denton building codes. Upon completion and prior to the release of any payment to DAHC, the unit is inspected to confirm that all required items have been completed. City staff provide ongoing technical assistance to the CHDO’s for income-eligibility verifications and renovation and construction projects. The City conducts bi-annual inspections of all HOME assisted units.
2020-2022 CONSOLIDATED PLAN & 2020 ACTION PLAN
... for housing and community development

ACTION PLAN

EXPECTED 3-YEAR FUNDING AMOUNT 2020-2022

- Affordable Housing
- No Hunger
- Good Health and Well-being
- Family Stability
- Special Needs
- Making Homelessness Rare, Brief, and Nonrecurring
- Transportation Access
- Economic Security

CDBG
HOME
CBDG-CV

STRATEGIC & ACTION PLAN PRIORITIES

<table>
<thead>
<tr>
<th>HOUSEHOLDS</th>
<th>PRIORITY</th>
</tr>
</thead>
<tbody>
<tr>
<td>123</td>
<td>AFFORDABLE HOUSING</td>
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<tr>
<td>7,560</td>
<td>MAKING HOMELESSNESS RARE, BRIEF, &amp; NONRECURRING</td>
</tr>
<tr>
<td>4,500</td>
<td>PUBLIC SERVICES</td>
</tr>
<tr>
<td>24,000</td>
<td>PUBLIC FACILITIES, IMPROVEMENTS &amp; INFRASTRUCTURE</td>
</tr>
<tr>
<td></td>
<td>PLANNING &amp; ADMINISTRATION</td>
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</tbody>
</table>

A REPORT FOR THE U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT
Community Development Block Grant (CDBG) Program
HOME Investment Partnerships (HOME)
**Expected Resources**

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

**Introduction**
Details about how we intend to spend specific grant resources in specific activities which tie back to our larger Strategic Plan Goals.

**Anticipated Resources**

<table>
<thead>
<tr>
<th>Program</th>
<th>Source of Funds</th>
<th>Uses of Funds</th>
<th>Expected Amount Available Year 1</th>
<th>Expected Amount Available Remainder of ConPlan $</th>
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<tbody>
<tr>
<td></td>
<td></td>
<td></td>
<td>Annual Allocation: $</td>
<td>Program Income: $</td>
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<tr>
<td>CDBG</td>
<td>Public-federal</td>
<td>• Administration • Housing • Public Improvements • Public Services</td>
<td>$1,051,794</td>
<td>$8,000</td>
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<td></td>
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<td></td>
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<tr>
<td>HOME</td>
<td>Public-federal</td>
<td>• Administration • Housing</td>
<td>$505,355</td>
<td>$80,000</td>
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<tr>
<td>CDBG-CV</td>
<td>Public-federal</td>
<td>• Administration • Public Improvements • Public Services</td>
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<td>$0</td>
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</tr>
<tr>
<td>General Fund</td>
<td>Local</td>
<td>• Administration • Public Services</td>
<td>$1,370,231</td>
<td>$0</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Denton is expecting level funding during the 2022-22 ConPlan period.

Denton is expecting level funding during the 2022-22 ConPlan period.

CARES Act CDBG-CV

Human Services Grant, Fairshare, Homeless Initiatives.

**Table 59 - 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

The CDBG and HOME activities leverage other funding sources to carry out various activities. For the 2020 program year, CDBG and HOME projects will leverage an additional $25,726,246 in federal, state, local, and private fund and include the following:

- Proposed General Funds for human services activities $342,231
- Proposed General Funds for administration $347,681
- Federal Funds for human services activities $5,168,765
- State Funds for human services activities $3,004,487
- Local Funds for human services activities $2,568,315
- Private Funds for human services activities $14,248,998
- Local Funds for housing programs $388,000

The above list includes proposed General Funds from the City of Denton. General fund recommendations will be considered during the normal budgeting cycle and considered for approval in September 2020.

The HOME program requires a participating jurisdiction to provide a 25% match of the federal HOME funds. The City of Denton’s local match for the HOME program is $113,705 for the 2020-2021 program year. The 25% match of federal HOME grant excludes administrative allowances of 10% and program income. The City of Denton will provide the match from a variety of sources including the following:

- Residual balance of match from prior years.
- Local and state funding provided to Denton Affordable Housing Corporation on eligible HOME projects, such as funds from the Federal Home Loan Bank, Denton County Housing Finance Corporation, and Texas Department of Housing and Community Affairs.
- General Funds provided on eligible HOME projects through the Affordable Housing Fee Grant Program.

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

Not applicable.

Discussion: See discussion in previous sections.
## Annual Goals and Objectives

### AP-20 Annual Goals and Objectives

**Goals Summary Information**

<table>
<thead>
<tr>
<th>Sort Order</th>
<th>Goal Name</th>
<th>Start Year</th>
<th>End Year</th>
<th>Category</th>
<th>Geographic Area</th>
<th>Needs Addressed</th>
<th>CDBG/HOME Funding</th>
<th>Goal Outcome Indicator</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>Affordable Housing</td>
<td>2020</td>
<td>2021</td>
<td>Affordable Housing</td>
<td>Denton City Limits</td>
<td>Affordable Housing</td>
<td>$274,060 CDBG $641,015 HOME</td>
<td>LMI Households/Individuals 67</td>
</tr>
<tr>
<td>2</td>
<td>Making Homelessness Rare, Brief and Nonrecurring</td>
<td>2020</td>
<td>2021</td>
<td>Homelessness</td>
<td>Denton City Limits</td>
<td>Homelessness and At-Risk</td>
<td>$75,000 CDBG</td>
<td>Homeless/At-Risk Households/Individuals 2,206</td>
</tr>
<tr>
<td>3</td>
<td>Non-Housing Community Development: Public Services</td>
<td>2020</td>
<td>2021</td>
<td>Non-Housing Community Development</td>
<td>Denton City Limits</td>
<td>Public Services</td>
<td>$82,769 CDBG</td>
<td>LMI Households/Individuals 1,117</td>
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<tr>
<td>4</td>
<td>Non-Housing Community Development: Public Facilities, Public Improvements and Infrastructure</td>
<td>2020</td>
<td>2021</td>
<td>Non-Housing Community Development: Public Facilities, Public Improvements and Infrastructure</td>
<td>Denton City Limits</td>
<td>Public Facilities, Public Improvements and Infrastructure</td>
<td>$393,839 CDBG</td>
<td>LMI Households/Individuals 16,513</td>
</tr>
<tr>
<td>5</td>
<td>Planning and Administration</td>
<td>2020</td>
<td>2021</td>
<td>Planning</td>
<td>Denton City Limits</td>
<td>Administration</td>
<td>$211,958 CDBG $58,535 HOME</td>
<td>N/A</td>
</tr>
</tbody>
</table>

### Table 60 – Goals Summary

**Goal Descriptions**

1. **Affordable Housing** - Support the provision of quality housing by increasing the availability/accessibility of affordable housing. The City will address the priority need by funding activities including: Home Repair Programs; Homebuyer Assistance Programs; new construction of affordable housing; homelessness prevention (non-HOME rental assistance); rapid re-housing; and supportive services.

2. **Making Homelessness Rare, Brief and Nonrecurring** - The City is providing support for the community’s Collective Impact
Project, the Denton County Homelessness Leadership Team that seeks to:

a. Increase leadership, collaboration, and engagement, with a focus on providing and promoting collaborative leadership at all levels of government and across all sectors

b. Strengthen the housing crisis response system’s capacity to implement and successful interventions to make Homelessness Rare, Brief and Nonrecurring.

c. Increase access to housing, by providing emergency, affordable housing and permanent supportive housing.

d. Increase economic security, by improving access to education and increasing meaningful and sustainable employment and improving access to mainstream programs and services to reduce financial vulnerability to homelessness.

3. **Non-Housing Community Development: Public Services** - The City will assist nonprofit organizations in carrying out public service activities assisting low-income persons, children/youth, seniors, persons with disabilities, and persons experiencing or at-risk of homelessness. Services will include but not be limited to 1) housing (emergency, supportive and permanent); 2) food security; 3) health, mental health and behavioral health care; 4) family stability; 5) special needs populations (senior, disabled, victims of domestic violence); 6) making homelessness rare, brief and nonrecurring; 7) transportation access; and 8) economic security.

4. **Non-Housing Community Development: Public Facilities, Public Improvements and Infrastructure** - Provides funding for public facility and infrastructure improvements. Public facility projects benefit LMI persons by creating/improving public services facilities such as ADA accessibility and increasing public service locations. Infrastructure improvement projects benefit LMI neighborhoods by improving existing infrastructure such as street improvements; installation of new sidewalk, water and sewer lines, and drainage improvements; improving and expanding park and recreational facilities.

5. **Planning and Administration** - Planning, management, and operations related to developing, administering and carrying out the 2020-2022 Consolidated Plan Strategic Plan and Annual Goals and Objectives.
**Projects**

**AP-35 Projects – 91.220(d)**

**Introduction**

The City of Denton is currently a Community Development Block Grant (CDBG) entitlement and a participating jurisdiction for the HOME Investment Partnership (HOME) Programs. SF-424 applications for CDBG and HOME are available in the appendix section. The City of Denton's estimated total federal funds and program income funding for the 2020 program year is $1,786,516 and includes $141,367 in reprogrammed funds from prior year funds. Besides the federal funds, the City of Denton is also leveraging an additional $ in local funds from the City of Denton General Funds for public services and administration.

Please note that Table 61 – Project Information shows the list of projects that will be funded with federal funds from the U.S. Department of HUD for the 2020 program year. Below is the list of projects that are recommended to be funded with General Funds for the 2020 fiscal year.

<table>
<thead>
<tr>
<th>Project Name</th>
<th>Amount</th>
</tr>
</thead>
<tbody>
<tr>
<td>Court Appointed Special Advocates (CASA)</td>
<td>$32,000</td>
</tr>
<tr>
<td>Communities in Schools</td>
<td>$32,000</td>
</tr>
<tr>
<td>Denton Christian Preschool</td>
<td>$30,000</td>
</tr>
<tr>
<td>Denton County MHMR Center</td>
<td>$20,000</td>
</tr>
<tr>
<td>Fred Moore Day Nursery School, Inc.</td>
<td>$30,000</td>
</tr>
<tr>
<td>Grace Like Rain, Inc.</td>
<td>$12,000</td>
</tr>
<tr>
<td>Health Services of North Texas</td>
<td>$50,000</td>
</tr>
<tr>
<td>Monsignor King Outreach Center</td>
<td>$50,000</td>
</tr>
<tr>
<td>Our Daily Bread</td>
<td>$40,000</td>
</tr>
<tr>
<td>PediPlace</td>
<td>$15,000</td>
</tr>
<tr>
<td>RISE: Reaching Individuals Through Service &amp; Education</td>
<td>$5,000</td>
</tr>
<tr>
<td>RSVP: Serving Denton County Volunteers</td>
<td>$6,000</td>
</tr>
<tr>
<td>North Texas Solutions for Recovery, Inc.</td>
<td>$10,000</td>
</tr>
<tr>
<td>Special Programs for Aging Needs</td>
<td>$10,231</td>
</tr>
<tr>
<td><strong>Sub-Total General Fund Human Services Grant FY2020-21</strong></td>
<td><strong>$342,231</strong></td>
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<tr>
<td>Children’s Advocacy Center</td>
<td>$165,000</td>
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<tr>
<td>Interfaith – Utility Assistance</td>
<td>$133,000</td>
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<tr>
<td>Monsignor King Outreach Center – Enhanced Shelter/RRH</td>
<td>$460,000</td>
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<tr>
<td>Our Daily Bread SO/RRH</td>
<td>$150,000</td>
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<tr>
<td>United Way Homeless Initiatives</td>
<td>$120,000</td>
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<td><strong>Sub-Total General Fund Fairshare/Homelessness Initiatives FY2020-21</strong></td>
<td><strong>$1,028,000</strong></td>
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<tr>
<td><strong>TOTAL GENERAL FUND FY2020-21</strong></td>
<td><strong>$1,370,231</strong></td>
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</tbody>
</table>
### Projects

<table>
<thead>
<tr>
<th>#</th>
<th>Project Name</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>2020 Carl Young Park Trail Lighting</td>
</tr>
<tr>
<td>2</td>
<td>2020 Community Development Administration</td>
</tr>
<tr>
<td>3</td>
<td>2020 DAHC Rental Rehabilitation</td>
</tr>
<tr>
<td>4</td>
<td>2020 Denton City County Day School</td>
</tr>
<tr>
<td>5</td>
<td>2020 Denton City County Day School Playground Phase 2 Project</td>
</tr>
<tr>
<td>6</td>
<td>2020 Denton County Friends of the Family</td>
</tr>
<tr>
<td>7</td>
<td>2020 Home Improvement Program</td>
</tr>
<tr>
<td>8</td>
<td>2020 Homebuyer Assistance Program</td>
</tr>
<tr>
<td>9</td>
<td>2020 Minor Repair Program</td>
</tr>
<tr>
<td>10</td>
<td>2020 PARD Summer Camp</td>
</tr>
<tr>
<td>11</td>
<td>2020 Quakertown Playground Replacement Phase 2 and Trail Lighting Project</td>
</tr>
<tr>
<td>12</td>
<td>2020 Salvation Army of Denton</td>
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<tr>
<td>13</td>
<td>2020 Serve Denton ADA Project</td>
</tr>
<tr>
<td>14</td>
<td>2020 Special Programs for Aging Needs</td>
</tr>
</tbody>
</table>

**Table 61 - Project Information**

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

The City’s approach to prioritization of needs identified in the Consolidated Plan were the result of enhance coordination between public and assisted housing providers and private and governmental health, mental health and service agencies by holding public meetings, utilizing public comment periods; gathering community surveys accessible online and in print for citizens and non-profit agencies, through active participating in coalitions and committees, maintaining ongoing consultation with various city departments; and ongoing consultation with housing providers including nonprofits and the Denton Housing Authority (SP-25).

Allocation are based on this needs analysis, the availability of other funds to target needs, the purpose of the Consolidated Plan funds, and the availability of City General Funds to meet a wide variety of needs. The City of Denton’s CDBG and HOME allocations have not been sufficient to allow for the funding of extensive housing, economic development or public works projects. For the City’s priority goals related to Affordable housing; Making Homelessness Rare, Brief and Nonrecurring; Public Services; Public facility and public improvement projects; each are prioritized by identified need and funding is allocated based on available funding and eligibility of projects.
### AP-38 Project Summary

#### Project Summary Information

<table>
<thead>
<tr>
<th></th>
<th>Project Name</th>
<th>Carl Young Park Trail Lighting Project</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Target Area</td>
<td>N/A</td>
</tr>
<tr>
<td></td>
<td>Goals Supported</td>
<td>Public Facilities, Public Improvements and Infrastructure</td>
</tr>
<tr>
<td></td>
<td>Needs Addressed</td>
<td>Park Improvements</td>
</tr>
<tr>
<td></td>
<td>Funding</td>
<td>CDBG $44,000</td>
</tr>
<tr>
<td></td>
<td>Description</td>
<td>Project consists of installing energy-efficient solar lighting along the park trail in Carl Young, Sr. Park, located at 327 South Wood Street in Denton.</td>
</tr>
<tr>
<td></td>
<td>Target Date</td>
<td>7/31/2021</td>
</tr>
<tr>
<td></td>
<td>Estimate the number and type of families that will benefit from the proposed activities</td>
<td>The project will benefit 3,560 people living in the project service area.</td>
</tr>
<tr>
<td></td>
<td>Location Description</td>
<td>Carl Young, Sr. Park, located at 327 South Wood Street in Denton. The service area includes CT21202 block group 1, 2, and 3.</td>
</tr>
<tr>
<td></td>
<td>Planned Activities</td>
<td>CDBG funds will be utilized to purchase of the solar lighting. Lighting will be installed by city employees.</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th></th>
<th>Project Name</th>
<th>2020 Community Development Administration</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Target Area</td>
<td>N/A</td>
</tr>
<tr>
<td></td>
<td>Goals Supported</td>
<td>N/A</td>
</tr>
<tr>
<td></td>
<td>Needs Addressed</td>
<td>N/A</td>
</tr>
<tr>
<td></td>
<td>Funding</td>
<td>CDBG: $211,958 HOME: $58,535</td>
</tr>
<tr>
<td>Project Name</td>
<td>Description</td>
<td>Target Date</td>
</tr>
<tr>
<td>--------------</td>
<td>-------------</td>
<td>-------------</td>
</tr>
<tr>
<td>2020 DAHC Rental Rehab Program</td>
<td>Program administration for the CDBG and HOME grants and includes program management, coordination, and monitoring associated with carrying out eligible activities.</td>
<td>7/31/2021</td>
</tr>
<tr>
<td>2020 DAHC Rental Rehab Program</td>
<td>Rehabilitation of rental units owned by the Denton Affordable Housing Corp, a certified CHDO. DAHC's rental units are rented to low and moderate-income renters.</td>
<td>7/31/2021</td>
</tr>
</tbody>
</table>

3. **Project Name:** 2020 Denton City County Day School

- Target Area: N/A

---

OMB Control No: 2506-0117 (exp. 06/30/2018)
<table>
<thead>
<tr>
<th>Project Name</th>
<th>2020 Denton City County Day School Playground Improvement Phase 2</th>
</tr>
</thead>
<tbody>
<tr>
<td>Target Area</td>
<td>N/A</td>
</tr>
<tr>
<td>Goals Supported</td>
<td>Public Facilities, Public Improvements and Infrastructure</td>
</tr>
<tr>
<td>Needs Addressed</td>
<td>Daycare services</td>
</tr>
<tr>
<td>Funding</td>
<td>CDBG: $110,916</td>
</tr>
<tr>
<td>Description</td>
<td>Funds will used for the purchase and installation of outdoor artificial turf surface under playground.</td>
</tr>
<tr>
<td>Target Date</td>
<td>7/31/2021</td>
</tr>
<tr>
<td>Estimate the number and type of families that will benefit from the proposed activities</td>
<td>71 low and moderate-income persons</td>
</tr>
<tr>
<td>Location Description</td>
<td>Denton City County Day School; 1603 Paisley St; Denton TX 76209</td>
</tr>
<tr>
<td>Planned Activities</td>
<td>Funds will cover a portion of the salaries for two (2) Lead Teachers.</td>
</tr>
<tr>
<td>Target Area</td>
<td>N/A</td>
</tr>
<tr>
<td>------------------</td>
<td>--------------------</td>
</tr>
<tr>
<td>Goals Supported</td>
<td>Making Homelessness Rare, Brief and Nonrecurring</td>
</tr>
<tr>
<td>Needs Addressed</td>
<td>Homelessness and At-Risk</td>
</tr>
<tr>
<td>Funding</td>
<td>CDBG: $40,000</td>
</tr>
<tr>
<td>Description</td>
<td>Denton County Friends of the Family to provide salary support for a Shelter Director to ensure shelter is properly equipped to improve clients sense of safety, provide support in overcoming the impact of violence and abuse, and begin the process of helping the client achieve and maintain self-sufficiency free from family violence.</td>
</tr>
<tr>
<td>Target Date</td>
<td>9/30/2021</td>
</tr>
<tr>
<td>Estimate the number and type of families that will benefit from the proposed activities</td>
<td>206 low and moderate-income persons</td>
</tr>
<tr>
<td>Location Description</td>
<td>Address is suppressed.</td>
</tr>
<tr>
<td>Planned Activities</td>
<td>Funds will cover the cost of the Shelter Director Salary.</td>
</tr>
</tbody>
</table>

### Project Name: 2020 Home Improvement Program

<table>
<thead>
<tr>
<th>Target Area</th>
<th>N/A</th>
</tr>
</thead>
<tbody>
<tr>
<td>Goals Supported</td>
<td>Affordable Housing</td>
</tr>
<tr>
<td>Needs Addressed</td>
<td>Home Repair</td>
</tr>
<tr>
<td>Funding</td>
<td>CDBG $24,060 HOME $440,381</td>
</tr>
<tr>
<td>Description</td>
<td>The objective of the HIP is to assist low and moderate-income families with securing safe, sanitary, energy-efficient, and decent housing. This objective is accomplished through owner-occupied rehabilitation (repair) and optional reconstruction (demolish and reconstruct home). HOME funds include $114,195 of 2019 reallocated funds.</td>
</tr>
<tr>
<td>Target Date</td>
<td>7/31/2021</td>
</tr>
<tr>
<td>Project Name</td>
<td>Description</td>
</tr>
<tr>
<td>--------------</td>
<td>-------------</td>
</tr>
<tr>
<td>2020 Homebuyer Assistance Program</td>
<td>The objective of HAP is to provide homeownership opportunities for low- and moderate-income families. The program assists first time homebuyers with closing costs and down payment assistance. Up to $50,000 is provided as a forgivable loan at 0% interest for the term of the five-year loan period.</td>
</tr>
<tr>
<td>2020 Minor Repair Program</td>
<td>Funds will be utilized to provide down payment, closing costs assistance and principal reduction to first-time homebuyers.</td>
</tr>
</tbody>
</table>

Location Description:
- Specific sites will be determined at a later date. This is a city-wide program. Applications are taken at the Community Development Division at 601 E. Hickory, Suite B, Denton Texas 76205.

Planned Activities:
- Funds will be utilized on rehabilitation or reconstruction costs.
<table>
<thead>
<tr>
<th>Goals Supported</th>
<th>Affordable Housing</th>
</tr>
</thead>
<tbody>
<tr>
<td>Needs Addressed</td>
<td>Home Repair</td>
</tr>
<tr>
<td>Funding</td>
<td>CDBG: $250,000</td>
</tr>
<tr>
<td>Description</td>
<td>Program addresses urgently needed repairs of homes (repairs costing less than $5,000 unless extenuating circumstances require as much as $10,000 for unity repairs). This program can stabilize a home within the city limits of Denton until a rehabilitation can be done. CDBG funds includes the following reallocated funds: $2,393 in 2015 funds, $1,040.49 in 2017 funds, and 23,738.25 in 2018 funds.</td>
</tr>
<tr>
<td>Target Date</td>
<td>7/30/2021</td>
</tr>
<tr>
<td>Estimate the number and type of families that will benefit from the proposed activities</td>
<td>52 low and moderate-income households</td>
</tr>
<tr>
<td>Location Description</td>
<td>This is a city-wide program. Applications are taken at the Community Development Division at 601 E. Hickory, Suite B, Denton Texas 76205.</td>
</tr>
<tr>
<td>Planned Activities</td>
<td>Funds will be used for rehabilitation costs for minor repairs.</td>
</tr>
<tr>
<td>Project Name</td>
<td>2020 PARD Summer Kids Camp</td>
</tr>
<tr>
<td>Target Area</td>
<td>N/A</td>
</tr>
<tr>
<td>Goals Supported</td>
<td>Public Services</td>
</tr>
<tr>
<td>Needs Addressed</td>
<td>Summer camp</td>
</tr>
<tr>
<td>Funding</td>
<td>CDBG: $30,000</td>
</tr>
<tr>
<td>Description</td>
<td>City of Denton Summer Kids Camp to provide full scholarships for a summer day camp program to income-eligible kids in need of quality care, mentoring, development of life skills, leadership, respect for others and respect for self.</td>
</tr>
<tr>
<td>Target Date</td>
<td>9/30/2021</td>
</tr>
<tr>
<td>Estimate the number and type of families that will benefit from the proposed activities</td>
<td>56 low and moderate-income persons</td>
</tr>
<tr>
<td>Location Description</td>
<td>Civic Center, Denia Recreation Center, McMath Middle School, and MLK Recreation Center</td>
</tr>
<tr>
<td>Planned Activities</td>
<td>Funds will cover the cost of 56 day camp scholarships.</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>11</th>
<th>Project Name</th>
<th>2020 Quakertown Playground Replacement Phase 2 and Trail Lighting Project</th>
</tr>
</thead>
<tbody>
<tr>
<td>Target Area</td>
<td>N/A</td>
<td></td>
</tr>
<tr>
<td>Goals Supported</td>
<td>Public Facilities, Public Improvements and Infrastructure</td>
<td></td>
</tr>
<tr>
<td>Needs Addressed</td>
<td>Park Improvements</td>
<td></td>
</tr>
<tr>
<td>Funding</td>
<td>CDBG $195,000</td>
<td></td>
</tr>
<tr>
<td>Description</td>
<td>Project consists of replacing the second part of the existing playground and installing energy-efficient solar lighting along the park trail in Quakertown Park, located at 700 Oakland Street in Denton.</td>
<td></td>
</tr>
<tr>
<td>Target Date</td>
<td>7/31/2021</td>
<td></td>
</tr>
<tr>
<td>Estimate the number and type of families that will benefit from the proposed activities</td>
<td>The project will benefit 6,780 people living in the project service area</td>
<td></td>
</tr>
<tr>
<td>Location Description</td>
<td>Quakertown Park, located at 700 Oakland Street in Denton</td>
<td></td>
</tr>
<tr>
<td>Planned Activities</td>
<td>Funds will be used for the purchase and installation of playground and purchase of the trail lighting system. City employees will install the trail lighting.</td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>12</th>
<th>Project Name</th>
<th>2020 Salvation Army of Denton</th>
</tr>
</thead>
<tbody>
<tr>
<td>Target Area</td>
<td>N/A</td>
<td></td>
</tr>
<tr>
<td>Goals Supported</td>
<td>Making Homelessness Rare, Brief and Nonrecurring</td>
<td></td>
</tr>
<tr>
<td>Needs Addressed</td>
<td>Homelessness and At-Risk</td>
<td></td>
</tr>
<tr>
<td>Funding</td>
<td>CDBG: $35,000</td>
<td></td>
</tr>
<tr>
<td>Description</td>
<td>The Salvation Army Denton Corps to provide assistance with food provided during the K.A.R.E. Kitchen daily meals and Food Pantry for clients experiencing homelessness and LMI households.</td>
<td></td>
</tr>
<tr>
<td>---</td>
<td>---</td>
<td></td>
</tr>
<tr>
<td>Target Date</td>
<td>9/30/2021</td>
<td></td>
</tr>
<tr>
<td>Estimate the number and type of families that will benefit from the proposed activities</td>
<td>2,000 low and moderate-income persons</td>
<td></td>
</tr>
<tr>
<td>Location Description</td>
<td>1508 East McKinney Street, Denton TX 76209</td>
<td></td>
</tr>
<tr>
<td>Planned Activities</td>
<td>Funds will cover a portion of the cost for K.A.R.E. Kitchen supplies, food pantry items, and a portion of the salary for a cook.</td>
<td></td>
</tr>
</tbody>
</table>

### Project Name: 2020 Serve Denton ADA Project

| Target Area | N/A |
| Goals Supported | Public Facilities, Public Improvements and Infrastructure |
| Needs Addressed | ADA Accessibility |
| Funding | CDBG $43,923 |
| Description | Project consists of constructing and improving sidewalks at Serve Denton located at 306 N Loop 288 in Denton to meet ADA accessibility. |
| Target Date | 7/31/2021 |
| Estimate the number and type of families that will benefit from the proposed activities | The project will benefit 6,102 people receiving assistance at Serve Denton. |
| Location Description | 306 N Loop 288 in Denton |
| Planned Activities | Funds will be used for the installation or replacement of sidewalks. |

### Project Name: 2020 Special Programs for Aging Needs

<p>| Target Area | N/A |
| Goals Supported | Public Services |</p>
<table>
<thead>
<tr>
<th>Needs Addressed</th>
<th>Food Security</th>
</tr>
</thead>
<tbody>
<tr>
<td>Funding</td>
<td>CDBG: $14,769</td>
</tr>
<tr>
<td>Description</td>
<td>Special Programs for Aging Needs (SPAN), Inc. to provide senior nutrition program providing nutritional home delivered and congregate meals for senior adults in Denton.</td>
</tr>
<tr>
<td>Target Date</td>
<td>9/30/2021</td>
</tr>
<tr>
<td>Estimate the number and type of families that will benefit from the proposed activities</td>
<td>990 persons low and moderate-income persons.</td>
</tr>
<tr>
<td>Location Description</td>
<td>Select Senior Centers and Senior Apartments Communities</td>
</tr>
<tr>
<td>Planned Activities</td>
<td>Funds will pay for a portion of the cost for meals.</td>
</tr>
</tbody>
</table>
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 Denton’s CDBG and HOME allocations have not been sufficient to allow for the funding of large or extensive housing, economic development or public works projects. Geographic standards do not apply to city-wide home repair, homebuyer assistance, and public services grant programs.

As required by CDBG guidelines, public facility and public improvement projects have been completed in residential areas meeting HUD’s low to moderate-income standards. All investments in public facilities and/or public improvements are based on requests received from residents of the low to moderate-income block groups and other areas of the city. After a request has been made, an assessment is made to determine the need for the improvement and the project cost. With support of staff recommendation on the appropriate use of CDBG funds and available projects funds that can be covered under the CDBG allocation, the City’s Community Development Advisory Committee evaluates which requests meet the community development needs and make recommendation to City Council.

Geographic Distribution

<table>
<thead>
<tr>
<th>Target Area</th>
<th>Percentage of Funds</th>
</tr>
</thead>
<tbody>
<tr>
<td>City of Denton, TX (City Limits)</td>
<td>100%</td>
</tr>
</tbody>
</table>

Table 62 - Geographic Distribution

Rationale for the priorities for allocating investments geographically

The City of Denton does not currently direct its investments in specific geographic areas.

Discussion: See above discussion.
Affordable Housing

AP-55 Affordable Housing – 91.220(g)

Introduction

Based on the goal to assist fifty-eight (58) households in our Home Repair Programs, assist six (6) first time homebuyers in our Homebuyer Assistance Programs, and provide funding for the CHDO’s Rental Rehabilitation program assisting three (3) households, the City’s one-year goal is to assist sixty-seven (67) households in PY 2020-21 with CDBG and HOME.

<p>| | |</p>
<table>
<thead>
<tr>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Homeless</strong></td>
<td>1</td>
</tr>
<tr>
<td><strong>Non-Homeless</strong></td>
<td>49</td>
</tr>
<tr>
<td><strong>Special-Needs</strong></td>
<td>17</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td>67</td>
</tr>
</tbody>
</table>

Table 64 - One Year Goals for Affordable Housing by Support Requirement

<table>
<thead>
<tr>
<th>Support Type</th>
<th>67</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Rental Assistance</strong></td>
<td>0</td>
</tr>
<tr>
<td><strong>The Production of New Units</strong></td>
<td>0</td>
</tr>
<tr>
<td><strong>Rehab of Existing Units</strong></td>
<td>61</td>
</tr>
<tr>
<td><strong>Acquisition of Existing Units</strong></td>
<td>6</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td>67</td>
</tr>
</tbody>
</table>

Table 65 - One Year Goals for Affordable Housing by Support Type

Discussion

In addition to CDBG/HOME activities, the City is also funding, through the General Fund, $225,000 for the Development Fee Grant program to assist nonprofit housing developers with a grant to cover the cost of development fees to reduce the development costs to supporting new construction of Affordable Housing Units. The City expects to receive applications for 2-3 projects in FY 2020-21.
**AP-60 Public Housing – 91.220(h)**

**Introduction**
The Denton Housing Authority (DHA) was formed in 1970 to address the housing needs of low-income families in the city of Denton. DHA does not manage any public housing units. The DHA currently administers 1,641 Housing Choice Vouchers (also referred to as Section 8 or HCV) and a Self-Sufficiency/Homeownership Program. DHA administers various public facility corporations to operate and manage other multi-family tax credit properties such as the Veranda and Renaissance Courts Townhomes, and Heritage Oaks and the Pecan Place Apartments which provides affordable housing for seniors.

**Actions planned during the next year to address the needs to public housing:** Not applicable.

**Actions to encourage public housing residents to become more involved in management and participate in homeownership:** Not applicable.

**If the PHA is designated as troubled, describe the manner in which financial assistance will be provided or other assistance:** Not applicable.

**Discussion:** See above discussion and in previous sections including NA-35 and MA-45.
AP-65 Homeless and Other Special Needs Activities – 91.220(i)

Introduction
This section describes the activities planned during the 2020-21 program year to address the needs of persons who are homeless and other non-homeless needs. It includes CDBG/HOME and General Fund activities.

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

- **Increase Street Outreach efforts to connect with people experiencing homelessness living unsheltered.**
  - Fund Street Outreach Program $64,600 (GF - Public Services Grant)
  - Fund Homeless Outreach Officers (GF – Police Budget)
  - Fund Staff to support annual Point in Time Count (GF – Budget)
  - The City will work with community partners to secure other funding sources

Addressing the emergency shelter and transitional housing needs of homeless persons

- **Increase the number of short-term supportive and long-term permanent affordable housing units for both individuals and families with children.**
  - Fund Monsignor King Outreach Center – Enhanced Emergency Shelter $450,000 (GF - Public Services Grant)
  - Fund Denton County Friends of the Family Emergency Shelter $40,000 (CDBG Project 6)
  - Affordable Housing Assessment Completion August 2020 (GF - FY2019-20)
  - The City will work with community partners to secure other funding sources

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
- Increase funding for Rapid Re-Housing for families and individuals including housing location and stabilization resources.
  - Fund RRH Program $100,000 (GF - Public Services Grant)
  - Fund Monsignor King Outreach Center –RRH $60,000 (GF - Public Services Grant)
  - Fund Our Daily Bread RRH $40,000 (GF - Public Services Grant)
  - Fund Interfaith – Utility Assistance $133,000 (GF – Utilities Grant)
  - United Way Homeless Initiatives $80,000 and Barriers Fund $40,000 (GF - Public Services Grant)
    - Housing Crisis Response System: Coordinated Entry (CE)
    - Housing Crisis Response System: Housing Priority List (HPL)
    - The City will work with community partners to secure other funding sources

- Increase specialized housing for those in Permanent Supportive Housing (PSH) for those with prioritized special needs.
  - United Way Homeless Initiatives $80,000 and Barriers Fund $40,000 (GF - Public Services Grant)
  - Housing Crisis Response System: Coordinated Entry (CE)
  - Housing Crisis Response System: Housing Priority List (HPL)
  - Collaboration with TX Balance of State Continuum of Care Programs

- Making the transition to permanent housing and independent living.
  - United Way Homeless Initiatives $80,000 and Barriers Fund $40,000 (GF - Public Services Grant)
  - Housing Crisis Response System: Coordinated Entry (CE)
  - Housing Crisis Response System: Housing Priority List (HPL)
  - Collaboration with TX Balance of State Continuum of Care (CoC)
  - Housing Crisis Response System: Collaboration with CoC funded PSH programs at Giving Hope, Inc. and Denton County MHMR

- Shortening the length time that individuals and families experience homelessness.
  - United Way Homeless Initiatives $80,000 and Barriers Fund $40,000 (GF - Public Services Grant)
  - Housing Crisis Response System: Coordinated Entry (CE)
  - Housing Crisis Response System: Housing Priority List (HPL)
Facilitating Access.

- United Way Homeless Initiatives $80,000 and Barriers Fund $40,000 (GF - Public Services Grant)
  - Housing Crisis Response System: Coordinated Entry (CE)
  - Housing Crisis Response System: Housing Priority List (HPL)
  - Housing Crisis Response System: Housing Navigator, Landlord Outreach Program

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.

Increase funding for Diversion (rapid resolution for diverting people from homelessness quickly).

- United Way Homeless Initiatives $80,000 and Barriers Fund $40,000 (GF - Public Services Grant)
  - Housing Crisis Response System: Coordinated Entry (CE)
  - Housing Crisis Response System: Housing Priority List (HPL)
  - Fund RRH Program $100,000 (GF - Public Services Grant)
  - Fund Monsignor King Outreach Center –RRH $60,000 (GF - Public Services Grant)
  - Fund Our Daily Bread RRH $40,000 (GF - Public Services Grant)
  - The City will work with community partners to secure other funding sources

Discussion

The questions from HUD illustrate the need for a coordinated systems approach to identifying those experiencing homelessness, preventing homelessness when possible, connecting people with housing quickly and providing services when needed. This Housing Crisis Response System (HCRS) is the City’s approach. While the PY2020-21 Action Plan submitted to HUD may only include with the goals for CDBG and HOME funds, the City invests general fund resources to strengthen the HCRS as a part of our goal to Make Homelessness Rare, Brief, and Nonrecurring. Therefore, all resources by source are described above.
AP-75 Barriers to affordable housing – 91.220(j)

Introduction
This section describes the activities planned during the 2020-21 program year to address barriers in affordable housing identified in the 2020-2022 Fair Housing Plan & Analysis of Impediments.

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

Details regarding the actions committed to remove or ameliorate the Barriers to Affordable Housing Responses are reflected in the City’s Fair Housing Plan and Analysis of Impediments (FHP-AI) in ATTACHMENT 2 as a part of this 2020-2022 Consolidated Plan.

The work plan includes 6 separate goals with proposed actions that are intended to remove or ameliorate barriers to affordable housing:

- **Increase access to affordable housing in high-opportunity areas**
  - Incorporate in Homebuyer Assistance Program training for realtors and lenders on strategies help families make informed housing choices in high opportunity areas based on data and other information on neighborhood opportunity.
  - Increase housing choice by increasing down payment assistance in the Homebuyer Assistance Program to bring down the overall home cost and make it affordable to lower AMI households.
  - Through the Development Fee Grant Program and Affordable Housing Assessment, continue to work with the Denton Affordable Housing Corporation and other nonprofit developers to increase the supply of affordable, mixed-income, non-segregated housing units throughout Denton.
  - Continue to seek out Funding, Programs, Advocacy tools, and Data sources that can help reduce barriers to development of affordable housing.

- **Increase supply of affordable housing units**
  - Continue to provide a Housing Tax Credit Application in support of the development and preservation of affordable rental housing for low-income households. Developers requesting Housing Tax Credits (HTC) through the Texas Department of Housing and Community Affairs are encouraged to include units at
all income ranges, including 0-30% and 31%-50%, and have resident services embedded in the housing or has a plan for connecting people to services.

- Complete the City’s first Affordable Housing assessment and utilize the assessment to help the City prioritize investment and incentive strategies to increase the supply of affordable housing, especially in high opportunity areas.
- Continuation of high performing housing programs designed to ensure that affordable, accessible housing is created and preserved in Denton.
- Seek opportunities to collaborate with housing services program providers who support the creation of new housing and preservation of existing affordable housing, the revitalization of low-income neighborhoods, and encourage homeownership for low and moderate-income homeowners.

### Increase supply of accessible, affordable housing for persons with disabilities

- Continued HOME funding provided to the City’s Community Housing Development Organization (CHDO), the Denton Affordable Housing Corporation.
- Provision of City general funds to provide a Development Fee Grant to nonprofit organizations providing supportive services to persons with disabilities.
- Ensure efforts to increase supply of affordable housing units includes prioritizations for special populations including, persons with disabilities.

### Make investments in targeted neighborhoods to improve access to opportunity

- Complete the City’s first Affordable Housing assessment and utilize the assessment to help the City prioritize investment and incentive strategies to increase the supply of affordable housing primarily in high opportunity areas.
- Access, or initiate, local networks of collaborators working on complex social issues to create a strategy to improve access to opportunity for residents of targeted neighborhoods.
- Although extensive housing, economic development, and public projects are not possible with the available federal funding allocation, efforts to invest these funds in public improvement projects in target residential areas will continue.
- Coordinate with transportation (DCTA) to improve access to transit resources (bus stops, route locations, and schedules, and covered bus stops to provide shelter in inclement weather).

### Increase access to information and resources on fair and affordable housing

- Support training opportunities on the City’s programs and Fair Housing for local real estate professionals, property owners, and managers.
o Provide support (letters, endorsements, financial, etc.) for local fair housing groups' education and/or local fair housing groups' fundraising efforts

o Identify trusted community partners who can assist with implementation of the City's fair housing goals to expand fair housing outreach, education, and training for targeted populations through collaborative strategies.

o Complete the City's first Affordable Housing assessment and incorporate assessment planning meetings with community stakeholders in multiple sectors to enhance their knowledge and support for affordable housing and fair housing goals.

o Attend HUD-sponsored or other fair housing training when available to keep staff apprised of any recent changes to fair housing laws or requirements as they relate to Community Development programs.

- **Increase supports and services for residents with housing assistance:**
  
o Coordinate with Denton County Transportation Authority (DCTA) to improve access to transit resources (bus stops, route locations, schedules, and covered bus stops to provide shelter in inclement weather)
  
o Continuation of housing programs designed to ensure that affordable, accessible housing is available in Denton.
  
o Improve the housing crisis response system programs, including street outreach, emergency short-term supportive housing, rapid rehousing, and permanent supportive housing to people experiencing or at-risk of homelessness.
  

**Discussion:** See discussion above.
AP-85 Other Actions – 91.220(k)

Introduction
This section reports additional effects the City will undertake during the 2020 program year to address residents’ housing and community development needs.

Actions planned to address obstacles to meeting underserved needs
Please see sections AP-55, AP-65, and AP-75.

Actions planned to foster and maintain affordable housing
Please see sections AP-55 and AP-75.

Actions planned to reduce lead-based paint hazards

During the 2020 program year, the City actions will be:

- Ensure that all regulatory requirements regarding lead-based paint are met throughout any housing rehabilitation construction activity performed by the City on homes constructed prior to 1978 including the Minor Repair Program, Home Improvement Program, Homebuyer Assistance Program, and DAHC’s Rental Rehabilitation.
- Seek opportunities to educate the public, housing services customers, and affordable housing partners, and contractors regarding the hazards of lead-based paint.

Actions planned to reduce the number of poverty-level families

During 2020-21 program year, the City actions will be:

1. Affordable housing assistance programs:
   a. $915,075 allocated to Implement or provide grants for Preserving Affordable housing through Repair, Renovation, Reconstruction, and Rental Rehabilitation projects.
      ° TARGET: 67 – City, Denton Affordable Housing Corp. (CDBG and HOME Projects 3,7,8, and 9)
   b. $225,000 allocated to the Development Fee Grant to projects in support the creation of Affordable Housing units (GF – Affordable Housing Grant)
      ° TARGET: 2-3 Projects
   c. $133,000 awarded for utility assistance programs that increase Housing Stability and Prevent Homelessness (See also: AP-65):
      ° TARGET: 125 – Interfaith (GF – Utilities Grant)
d. $152,000 for Public Services Grants for rental assistance increase Housing Stability and Prevent Homelessness (See also: AP-65) (GF - Public Services Grant):
   ◦ TARGET: 50 – United Way Barriers Fund (GF)
   ◦ TARGET: 25 – Monsignor King Outreach Center, Our Daily Bread – RRH (GF)
   ◦ TARGET: 144 – Grace Like Rain Rental Assistance (GF)
   ◦ GOAL: Seeking other funding

e. Implementation of Affordable Housing Assessment (GF - FY2019-20)
   ◦ GOAL: Completion August 2020 (GF)

2. $100,000 for Public Services, Facility, and/or Infrastructure Grants to combat Food Insecurity;
   a. Human Services Grant (CDBG/GF - Public Services Grant)
      ◦ TARGET: 1,650 – ODB (GF)
      ◦ TARGET: 2,000 – TSA households (CDBG Project 12)
      ◦ TARGET: 990 – SPAN (CDBG Project 14)

3. $95,000 for Public Services, Facility, and/or Infrastructure Grants to increase availability and access to Health, Mental Health, and Behavioral Health Care;
   a. Human Services Grant (CDBG/GF - Public Services Grant)
      ◦ TARGET: 48 – DC MHMR (GF)
      ◦ TARGET: 240 – Health Services of North Texas (GF)
      ◦ TARGET: 414 – PediPlace (GF)
      ◦ TARGET: 210 – Solutions of North Texas (GF)

4. $128,000 for Public Services, Facility, and/or Infrastructure Grants to improve Family Stability by improving safety, support, and opportunity including access to affordable childcare;
   a. Human Services Grant (CDBG/GF - Public Services Grant)
      ◦ TARGET: 85 – Denton Christian Preschool (GF)
      ◦ TARGET: 71 – Denton City County Day School (CDBG Project 4)
      ◦ TARGET: 410 – Fred Moore Day Nursery School (GF)
      ◦ TARGET: 56 – PARD Summer Kids Camp (CDBG Project 10)

5. Public Services, Facility, and/or Infrastructure Grants to increase availability and access to services for special needs populations (seniors, disabled, veterans, abused and neglected children, and victims of domestic violence) (See also: AP-65):
   a. Human Services Grant (CDBG/GF - Public Services Grant)
      ◦ TARGET: 270 – CASA (GF)
      ◦ TARGET: 206 – Denton County Friends of the Family Emergency Shelter (CDBG Project 6)
6. Public Services, Facility and/or Infrastructure Grants to make homelessness rare, brief, and nonrecurring (See also: AP-65):
   a. Utilities Grant (GF - Budget)
      ° TARGET: 1c
   b. Human Services Grant (GF - Public Services Grant)
      ° TARGET: 1d
      ° TARGET: 5a

7. Intergovernmental collaboration and Public Services, Facility and/or Infrastructure Grants to increase access to Transportation increasing housing and workforce stability;
   a. Human Services Grant (GF - Public Services Grant)
      ° GOAL: Participate in DCTA Community Meetings to discuss solutions that increase access to Transportation.

8. Public Services Grants to increase access to mobility, educational programs, and workforce development for Economic security.
   a. Human Services Grant (GF - Public Services Grant)
      ° TARGET: 760 – Communities in Schools (GF)
      ° TARGET: 2000 – RISE (GF)
      ° TARGET: 600 – RSVP (GF)

Actions planned to develop institutional structure

The City has defined the strategies below:

- Develop and maintain a coordination system across service sectors and cultivation of systems to better match services to identified need;
- Identifying and continuously evaluating the strengths and gaps in housing and supportive services including improving systems to share best practices information across sectors;
- Collect and utilize data that informs system-wide based decision making for prioritizing and selecting high performing projects.

During the 2020 program year, the City actions related to institutional structures will be:

- **GOAL 1: Affordable Housing** (See Also: AP-55, AP-75)
  - Implementation of Affordable Housing Assessment (GF - FY2019-20)
    - ACTIONS: Completion August 2020 (GF)

- **GOAL 2: Make Homelessness Rare Brief and Nonrecurring** (See Also: AP-65)
  - Continue collaboration among governments and community partners
- ACTIONS: Financial and Human Resources in Support of Denton County Homelessness Leadership Team in partnership with the United Way
- ACTIONS: Financial and Human Resources to Improve Housing Crisis Response System;

- **GOAL 3: Non-Housing Community Development: Public Services** (See Also: AP-55, AP-65, and AP-75)
  - Continue collaboration among governments and community partners
    - ACTIONS: Financial and Human Resources in Support of local nonprofits through grants and other programs.
    - ACTIONS: Participate in Intergovernmental groups, local Coalitions, and Community Meetings to discuss solutions for improved community response systems to complex social issues.

- **GOAL 4: Non-Housing Community Development: Public Facilities, Public Improvements and Infrastructure**
  - Coordinate Public Facilities, Public Improvements and Infrastructure projects improve neighborhoods;

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

The City of Denton has a very strong network of service providers including those providing housing and supportive services. The City has a partnership with the United Way of Denton County, in two Collective Impact projects, the Denton County Behavioral Health Leadership Team and the Denton County Homelessness Leadership Team. These projects bring public and private agencies together to review and discuss the provision of services in the Denton area to improve systems and maximize the benefits derived from available resources.

In addition, Denton has several work groups, committees, collaborations, and coalitions that have been developed to assist in enhancing coordination of services:
- Denton County Behavioral Health Leadership Team and Homelessness Leadership Teams
- Denton County Homeless Coalition
- Committee on Persons with Disabilities
- Denton Hunger Coalition
- Early Childhood Coalition
- Healthy Communities Coalition (specific issues discussed including mental health)
City of Denton staff including Community Development staff will continue to actively participate in the above committees during the 2020-21 program year. The City is part of a strong team of service providers who are working to improve services.

**Discussion**
While the PY2020-21 Action Plan submitted to HUD may only include with the goals for CDBG and HOME funds, the City invests general fund resources to address residents’ housing and community development needs. Therefore, all resources by source are described above.
Program Specific Requirements

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

Introduction
During the 2020 program year, the City of Denton plans to use the HOME affordable homeownership limits for Denton as provided by HUD for HOME funds for homebuyer assistance, rehabilitation of owner-occupied single-family housing, and rehabilitation of rental units by CHDO in accordance with 24 CFR 92.254(a)(2)(iii). Below are specific requirements for the Community Development Block Grant and the HOME Investment Partnership Program.

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

Total Program Income $0

Other CDBG Requirements

1. The amount of urgent need activities $0
HOME Investment Partnership Program (HOME)
Reference 24 CFR 91.220(l)(2)

1. **A description of other forms of investment being used beyond those identified in Section 92.205 is as follows:**

The City of Denton does not utilize other forms of investment beyond those identified in 92.205(b). The City will not permit other forms of investment without the prior approval of HUD.

2. **A description of the guidelines that will be used for resale or recapture of HOME funds when used for homebuyer activities as required in 92.254, is as follows:**

The City of Denton will utilize recapture for homebuyers for the HOME program including any projects funded with HOME Program Income (PI). The policy provides guidelines that will be used for recapture of HOME funds when used for homebuyer activities under the Homebuyer Assistance Program as required in 24 CFR 92.254.

All homebuyers sign a HOME written agreement with the City outlining the affordability period and recapture provisions. For HOME-assisted homebuyer units the period of affordability is based upon the direct HOME subsidy provided to the homebuyer that enabled the homebuyer to purchase the unit. Any HOME program income used to provide direct assistance to the homebuyer is included when determining the period of affordability.

Recapture provisions will be used when the homebuyer transfers the property either voluntarily or involuntarily during the period of affordability. If the home is transferred during the affordability period, a portion of the net sales proceeds, if any, are returned to the City of Denton. The amount subject to recapture is reduced based on a pro rata reduction during the affordability period. The funds returned are equal to the amount of HOME funds invested less the amount for each full month that the homebuyer has occupied the house as principal residence. Any funds remaining after the distribution of the net sales proceeds to all lien holders, including the City of Denton, will be returned to the homeowner.

In the event of a sale, short sale or foreclosure, the amount recaptured will be limited to the amount of net sales proceeds’ available at the time of such occurrence. If there are insufficient funds remaining from the sale of the property, the City will recapture less than or none of the recapture amount due and maintain data in each individual file that provides the amount of the sale and the distribution of the funds.
The Recapture mechanisms used to secure the affordability of the HOME-assisted unit are recorded in accordance with state law with a promissory note, deed of trust and written agreement with the City of Denton. The affordability period stated in the note and deed of trust is the minimum period for the project.

In all cases, the amount to be repaid is the subsidy provided directly to or on behalf of the homebuyer for closing costs and is limited to the net proceeds of the sale, which is defined as the sales price minus the first lien and seller paid closing costs and includes only the following items to the extent actually incurred: brokers commission, reasonable attorney fees, and any transfer tax or recording fee payable by the seller.

3. **A description of the guidelines for resale or recapture that ensures the affordability of units acquired with HOME funds? See 24 CFR 92.254(a)(4) are as follows:**

   Federal assistance will be provided in the form of a 0% interest, forgivable deferred payment loan (DPL) and will be secured by a HOME Written Agreement, fully executed and dated by all applicable parties and a Promissory Note and Deed of Trust. The Deed of Trust is recorded in the Real Property Records of Denton County.

4. **Plans for using HOME funds to refinance existing debt secured by multifamily housing that is rehabilitated with HOME funds along with a description of the refinancing guidelines required that will be used under 24 CFR 92.206(b), are as follows:**

   The City of Denton does not currently use of HOME funds to refinance existing debt secured by multi-family housing that is being rehabilitated with HOME funds.
The City of Denton’s Community Development Citizen Participation Plan (COD CPP) allows all citizens of Denton the opportunity to comment on the Consolidated Plan for Housing and Community Development (ConPlan), the Annual Action Plan, Substantial Amendments, Consolidated Annual Performance and Evaluation Report (CAPER), and the Assessment of Fair Housing (AFH) or Analysis of Impediments to Fair Housing Choice (AI) as required by HUD.

This COD CPP sets forth the City's policies and procedures for citizen participation. This COD CPP will become effective August 2020, the first year of 2020-2022 Consolidated Plan and as amended. It will be provided as a supplement to the 2020-2022 Consolidated Plan for Housing and Community Development, and hard copies will be made available for review by Community Development upon request.

Citizens and organizations can provide comments on activities to Community Development, 601 E. Hickory St., Suite B., Denton Texas 76205. The phone number for the office is 940-349-7726.

METHODS OF CITIZEN INVOLVEMENT
The COD CPP provides residents an overview of the City’s plan to actively encourage widespread citizen participation. The City will take whatever actions are appropriate to encourage the participation of all its residents. The City will encourage resident participation by providing City residents access to Meetings and Information.

- Meetings:
  - Hold public hearings and post public notices of meetings;
  - Technical assistance for all individuals, agencies and groups that request assistance, including groups representative of persons of low- and moderate-income; and
  - Take reasonable steps to provide language assistance or other means of communication to ensure meaningful access to participation.

- Information:
  - Publish a draft of the Consolidated Plan;
  - Set a period of time for public comment and review;
  - Providing a timely response to written complaints and grievances; and

ACCESS TO MEETINGS
The City will afford adequate, timely notification so that residents can attend local meetings and public forums and be involved in decision making at various stages of the program.
Public Hearings
The City will provide at least two public hearings during each program year cycle with at least one held before the proposed Consolidated Plan and/or Annual Action Plan is published for comment. This public hearing meeting will usually take place in a scheduled April City Council meeting. A 30-day public review period will be included in that notice to receive comments from residents of the community on the plan(s).

The second public hearing will be related to the community’s unmet needs and priorities. This public workshop format will usually take place in August or September and will take place before the Notice of Funding Availability (NOFA) goes out for the upcoming grant funding cycle. Following the public workshop, the information gathered will be presented to the City Council for adoption of the set priorities for the upcoming funding cycle.

Public hearings are held at a convenient time and location for persons who may be affected by the proposed funding, accessible to persons with disabilities, and adequately publicized. The City will make information available to residents, public groups, and other interested parties, concerning the amount of funding the City expects to receive (including grant funds and program income), the range of proposed activities that may be undertaken and the amount proposed to benefit low- and moderate-income residents. Notification to the public will be published at a minimum of seventy-two (72) hours in advance of all public meetings and hearings. Press releases announcing meetings and information will be sent out to the local media, included in the City’s electronic newsletter, and posted on the City’s website and in public facilities such as the City’s libraries, recreation centers, and offices.

Technical Assistance
The City will provide information and technical assistance throughout the process to all individuals and groups that request assistance, particularly in developing proposals for the Annual Action Plan and Consolidated Plan.

ACCESS TO INFORMATION
City residents and groups will have access to information and records covering the preceding five (5) years. Special arrangements may be made for individuals who are not available during regular office hours or who are disabled and not able to visit the Community Development office. The information can also be emailed to citizens upon request. Charges for copies will be based on current City of Denton policies under the Open Records Act.
Publication of the Consolidated Plan
The City will publish its proposed Annual Action Plan and Consolidated Plan so that residents have sufficient opportunity to review it and provide comments. The requirement for publishing will be met by publishing a summary of the proposed plan in a newspaper of general circulation and making copies of the proposed plan available on the City’s website and in public facilities such as the City’s libraries, recreation centers, and offices. The summary will describe the contents and purpose of the Annual Action Plan / Consolidated Plan and include a list of the locations where copies of the entire plan may be examined.

Comments
A period of not less than 30 days will be provided to the public for review and comment on the proposed Annual Action Plan / Consolidated Plan prior to submission to HUD. The City will consider the views of residents, public agencies, and other interested parties in preparing its final plans and attach a summary of such comments to the Final Plan. A period of not less than fifteen (15) days will be provided to the public for review and comment on the CAPER prior to submission to HUD.

Complaints and Grievances
The City will provide timely, written responses to written complaints and grievances within fifteen (15) working days whenever practical.

ANNUAL CITIZEN PARTICIPATION PROCESS
The annual citizen participation process will consist of twelve (12) steps outlined below:

STEP 1. Notify public of information on annual process and request comments
Public notices and informational packets will be posted on the City’s website and sent to interested persons, organizations, groups, and the media (both English and Spanish), advising of the annual citizen participation process and requesting comments. A bilingual staff person is available for non-English speaking persons to request information or file a comment.

STEP 2. Conduct public workshop to identify housing and community development needs and review program performance
The Community Development Advisory Committee (CDAC) and staff will conduct a public workshop at a time and place convenient to the public and accessible to persons with disabilities. At the public workshop, staff will provide information and receive comments and views from the public concerning housing and community development needs, development of
proposed activities, and past program performance. In an effort to encourage participation, the same Public Notice process (Step 1.) will be deployed. In addition, a bilingual translator and/or special audio equipment will be available for non-English speaking persons who attend.

**STEP 3. City Council meeting regarding priorities for the upcoming fiscal year**

The CDAC will make recommendations to the City Council as to the priorities obtained during Step 2. above for the upcoming funding cycle. The City Council will give the CDAC and staff direction on what the priorities should be for the upcoming funding cycle and the Notice of Funding Availability (NOFA) will be generated.

**STEP 4. 45 Day Written Application and Comment Period**

A minimum of 45 days will be allowed for the receipt of applications for proposed activities for the development of the Annual Action Plan and Consolidated Plan every third year. At the end of the application period, staff will receive all complete applications and prepare an analysis of the eligibility of all proposed activities for presentation to the CDAC.

**STEP 5. Review of Applications and Recommendations by the CDAC**

The CDAC will have a minimum of 30 days to review all written applications and receive presentations from applicants of all proposed activities.

**STEP 6. CDAC Adopts Recommendation for Proposed Activities and Allocation of Funds**

The CDAC will complete its review of all applications and public comments to adopt funding recommendations for presentation to the City Council on the proposed activities and allocation of funds. Staff will present the CDAC’s recommendation to City Council and applicants.

**STEP 7. City Council Public Hearing on Consideration of CDAC Recommendation for Proposed Activities and Allocation of Funds**

The City Council will conduct a public hearing to receive comments and consider the CDAC’s recommendation for proposed activities and allocation of funds.

**STEP 8. Publication of Proposed Consolidated Plan / Annual Action Plan**

A summary describing the contents and purpose of the proposed Annual Action Plan and/or Consolidated Plan and will be published in the Denton Record-Chronicle. The publication will include a list of the locations where copies of the entire plan will be available for review and examination (see General Process Step 2 for locations). As per HUD regulations, a reasonable number of free copies will be made available to individuals and groups that request it.
STEP 9. 30-Day Public Review Period of Proposed Consolidated Plan / Annual Action Plan
To provide sufficient opportunity for review and comment, a period of no less than 30 days will be provided to residents, public agencies, and other interested parties on the proposed Annual Action Plan and/or Consolidated Plan. The City will consider all comments and views in preparing its final Annual Action Plan/Consolidated Plan and will attach a summary of such comments to the Final Plan.

STEP 10. City Council Adoption of Final Consolidated Plan / Annual Action Plan
Upon completion of the 30-day public review period and after consideration of all comments and input, the City Council will adopt the final Annual Action Plan/Consolidated Plan, including the specific activities and allocation of funds. The Final Adopted Plan will be submitted to HUD.

During HUD’s review period, copies of the Annual Action Plan / Consolidated Plan will be made available at the Community Development office (601 E. Hickory St., Suite B, Denton, TX 76205) and the City’s website at www.cityofdenton.com. All documents, along with other information about the City’s programs and projects are also available throughout the year on the City’s webpage at www.cityofdenton.com.

HUD requires 30-day public review periods for the Consolidated Plan and the Annual Action Plan, while the review period for the Consolidated Annual Performance Evaluation Report (CAPER) is fifteen (15) days. Questions, concerns, comments, and complaints may be directed to the following City department during these review periods, and at any time during the year:

City of Denton
Community Development
601 E. Hickory Suite B,
Denton, TX 76205
Phone: (940) 349-7726

It should be noted that HUD officials will consider public concerns anytime regarding the City’s plans and programs, Plan, preferably during the 45-day HUD review period. Written concerns may be submitted to:

U.S. Department of Housing and Urban Development
Office of Community Planning and Development
Fort Worth Regional Office
Phone: (817) 978-5933
STEP 11. Substantial Amendments

As defined in Section 24 of the Code of Federal Regulations Part 91.505, the City identifies a substantial amendment as the following:

1. Any transfer of funds over 10% of the total grant allocation for the fiscal year in which the activity was funded;
2. Cancellation of a planned activity;
3. A change in the primary purpose, scope, location or beneficiaries of an activity to the extent that it would be considered a new activity, at the discretion of the Community Development Manager; or
4. Any increase or decrease in a proposed allocation (HUD grant) that is over 1% of the total allocation for the fiscal year.
5. Disaster/Emergency Events

When an amendment takes place, the City will make the amendment public by posting it on the website, notifying the public, and submitting it to City Council for approval. All comments received will be provided to City Council for consideration. The document will then be submitted to HUD for approval. A substantial amendment will require, at a minimum, that Steps 8 through 11 of the entire citizen participation process be repeated.

Disaster/Emergency Events That May Require Expedited Substantial Amendments

The City of Denton may need to amend Consolidated Plan or Action Plans in the event of a declared disaster or emergency. There are three types of disasters or emergency events that may need an expedited substantial amendment process, including:

1. Man-Made-Disasters. Man-made disasters can include chemical spills, mass rioting, power outages, plant explosions, etc.
2. Natural Disasters. Natural disasters can include flooding, tornadoes, earthquakes, and public health issues. Public health issues can include a wide-spread disease such as the coronavirus disease (COVID-19).
3. Terrorism. Terrorism events include bomb threats and biochemical attacks, etc.

Substantial amendments in the event of declared disaster or emergency may include funding new activities and/or reprogramming funds, including canceling activities to meet urgent community development needs. Therefore, the City of Denton may utilize CDBG or HOME funds to meet these needs of the community with an amended public comment period as allowed by law instead of a 30-day public comment period, which is normally required for substantial amendments.
In the event that the City of Denton is closed to the public or has declared an emergency, or national or local health authorities recommending social distancing and limiting public gatherings for public health reasons the following public participation will be modified as allowed by law:

1. Virtual public meetings/hearings may be used in place of in-person public meetings/hearings.
2. Real-time responses and accommodations for persons with disabilities and/or limited English proficiency will be made available when possible.
3. Public review of Consolidated Plan or Action Plans will be limited to on-line review on the City’s website.
4. Public comments will be accepted by email, phone, fax, and during a virtual public hearing.


To provide sufficient opportunity for review and comment, a period of no less than fifteen (15) days will be provided to residents, public agencies, and other interested parties on the Consolidated Annual Performance and Evaluation Report (CAPER). The City will consider all comments will attach a summary of such comments to the final HUD report.
CITIZEN PARTICIPATION PLAN
2020-2022

CITIZEN PARTICIPATION PLAN GENERAL PROCESS

_i.e. Assessment of Fair Housing (AFH) or Analysis of Impediments to Fair Housing Choice (AI), Section 108 Loan Guarantee funds, etc._

Prior to the adoption of other local plans such as an Assessment of Fair Housing (AFH) or Analysis of Impediments to Fair Housing Choice (AI) as required by HUD, implementation of the following public comment, review, and adoption procedures will ensure that all residents have a chance to participate in development of the applicable plan.

**Step 1. Notify public**
The City will provide a notice of a 30-day public review period and public hearing in the Denton Record-Chronicle. The notice will be printed in the Denton Record Chronicle a minimum of ten (10) days prior to the public hearing date.

**Step 2. Allow for public review of Citizen Participation Plan (COD CPP)**
The plan will be available for public review at public facilities in Denton, TX which may include:
- Recreation Centers: MLK Jr., 1300 Wilson St. and Denia, 1001 Parvin St.
- Libraries: North Branch Library, 3020 N. Locust St., Emily Fowler Library, 502 Oakland St., and South Branch Library, 3228 Teasley Ln.
- City Hall, 215 E McKinney St.

Upon request, plans/amendments will be made accessible to any persons with disabilities. The City will provide a reasonable number of free copies of the Citizen Participation Plan to residents and groups that request copies.

**Step 3. Accept written or oral public comment**
Comments or views of residents received in writing during the public review period or orally at the public hearing will be solicited and considered by the Community Development Advisory Committee and City Council.

**Step 4. Adoption of the Plan**
The Draft Plan will be adopted within the City’s Consolidated Plan for Housing and Community Development upon a majority vote of the City Council at a designated and publicly noticed City Council meeting. After adoption of the Plan, a Final Plan will be prepared. The Final Plan will include a summary of public comments and a summary of any comments not accepted and the reasons, therefore, all of which will be attached to the final plan and published on the City’s website. _www.cityofdenton.com_.

CITY OF DENTON (v. 2020)
## CDBG FUNDING CYCLE TIMELINE (subject to change depending on grant allocation process)

<table>
<thead>
<tr>
<th>Month</th>
<th>Actions Taken</th>
</tr>
</thead>
<tbody>
<tr>
<td>September</td>
<td>Needs Assessment Public Workshop / Adopt funding priorities for upcoming fiscal year</td>
</tr>
<tr>
<td>October</td>
<td>City Council / Regular Business Item regarding proposed funding priorities and Notice of Funding Availability (NOFA)</td>
</tr>
<tr>
<td>November</td>
<td>Community Development Advisory Committee (CDAC) Regular Meeting to give an overview of the application review procedures, releases NOFA to public</td>
</tr>
<tr>
<td>December</td>
<td>Mandatory pre-application workshop for sub-recipients</td>
</tr>
<tr>
<td>January</td>
<td>Deadline for written applications, staff analysis of applications, CDAC to review criteria, prepare for applicant presentations</td>
</tr>
<tr>
<td>February</td>
<td>CDAC Regular Meetings to hear applicant presentations, and special CDAC meeting to conduct deliberations.</td>
</tr>
<tr>
<td>March</td>
<td>City Council / Public Hearing Item on proposed plan.</td>
</tr>
<tr>
<td>April</td>
<td>Begin 30-day review period of proposed Annual Action Plan based on the City Council’s decision.</td>
</tr>
<tr>
<td>May</td>
<td>City Council final approval of Annual Action Plan and submission of plan to HUD at least 45 days before the start of the new fiscal year.</td>
</tr>
</tbody>
</table>
METHODS OF SOLICITING CITIZEN INPUT

- **ELECTRONIC MAILINGS**
  Electronic mailings like emails and newsletters will be sent out to interested organizations and individuals. A mailing list will be maintained and updated on a regular basis.

- **WEBSITE**
  Notices, agendas, news releases, annual action plans, the consolidated plan, annual performance reports, and application forms will be posted regularly on the City’s website at [www.cityofdenton.com](http://www.cityofdenton.com).

- **NEWS RELEASES**
  News releases will be submitted to all news media at all stages of the citizen participation process. Every effort will be made to ensure that the information is sent out in English and Spanish.

- **LEGAL ADVERTISEMENTS**
  Legal advertisements will be published in the legal section of the local newspaper when legally required.

ANTI-DISPLACEMENT NOTICE

No activities will result in involuntary displacement of persons. However, should such displacement occur, the City of Denton will follow the procedures described below:

Following the approval of the ConPlan and APs, the City will review all projects recommended for funding to identify those activities that would result in the displacement of residents. The City’s goal is to minimize displacement of its residents. However, when displacement is unavoidable, before any formal action is taken by the City to displace an individual, the City will notify, in writing, those residents who will be displaced and outline the types of services available through the City. The City will comply with all requirements of the Uniform Relocation Assistance Act, and will not displace any resident unless suitable, safe, decent, and quality housing is available. All replacement units will be inspected to ensure suitability. Residents who must relocate will be provided with counseling assistance and referrals to replacement housing. In the event that a resident disagrees with the need for displacement, he or she may make an appeal in writing to the City of Denton, Community Development.
### DEFINITIONS

<table>
<thead>
<tr>
<th>Term</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>Annual Action Plan</td>
<td>The City is required to prepare an Annual Action Plan which describes how it will use CDBG and HOME funds during each new fiscal year to address the needs discussed in the Consolidated Plan. The Annual Action Plan must be consistent with the multi-year Consolidated Plan. The Annual Action Plan must be submitted to HUD 45 days prior to the beginning of the program year. For the City, the beginning of the program year is August 1st.</td>
</tr>
<tr>
<td>CDBG</td>
<td>Community Development Block Grant Program (CDBG) is administered by HUD and is authorized under Title 1 of the Housing and Community Development Act of 1974, as amended. The purpose of the CDBG Program is to enhance and maintain viable urban communities through the provision of quality housing, a suitable living environment, and the expansion of economic opportunities, principally for low- and moderate-income persons.</td>
</tr>
<tr>
<td>CHDO</td>
<td>Community Housing Development Organizations (CHDO) are housing non-profit organizations that meet certain requirements set forth by HUD under the HOME program. The federal government requires the City to set aside 15% of its HOME Program allocation for CHDO’s.</td>
</tr>
<tr>
<td>CAPER</td>
<td>Consolidated Annual Performance and Evaluation Report (CAPER) describes the accomplishments of the City’s CDBG and HOME programs at the end of each fiscal year. The Plan is an assessment of the City’s progress in accomplishing the goals of the Annual Action Plan and the Consolidated Plan.</td>
</tr>
<tr>
<td>Consolidated Plan</td>
<td>The City is required to prepare a Consolidated Plan to receive CDBG and HOME funds. The three-year or five-year plan includes a description of the housing and community development needs of the City, the City’s priorities given the limited financial resources available to the City, and a strategy toward addressing those needs.</td>
</tr>
<tr>
<td>HOME</td>
<td>Home Investment Partnerships Program (HOME) is administered by HUD as authorized by the 1990 National Affordable Housing Act, as amended by the Housing and Community Development Act of 1992. The purpose of the HOME Program is to expand the supply of affordable, quality housing, and a suitable living environment.</td>
</tr>
<tr>
<td>HUD</td>
<td>U.S. Department of Housing and Urban Development (HUD) is the federal agency that administers the CDBG and HOME funds. The City must abide by HUD regulations for these programs as a condition for receiving these funds.</td>
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</table>
FAIR HOUSING PLAN
&
ANALYSIS OF IMPEDIMENTS

2020-2022

PREPARED BY:
CITY OF DENTON
COMMUNITY DEVELOPMENT
601 E. Hickory St., Suite B,
Denton, TX 76205
Phone: (940) 349-7726

Draft Version: May 1, 2020
INTRODUCTION

The City of Denton's Community Development Fair Housing Plan and Analysis of Impediments (FHP-AI) is part of our City’s consolidated planning process. It provides a supplement to the Consolidated Plan for Housing and Community Development (ConPlan) supporting the City’s commitment to affirmatively furthering fair housing for all persons.

History

Title VIII of the “Civil Rights Act of 1968” (the “Fair Housing Act”) requires The Department of Housing and Urban Development (HUD) to administer its programs in a way that affirmatively furthers fair housing. The laws that establish the Community Development Block Grant (CDBG) program require local government (entitlement communities), states, and the Public Housing Authority (PHA) to certify in writing that they are affirmatively furthering fair housing. This process has been relatively unchanged since 1996.

On July 16, 2015, HUD published its final rule implementing the “Fair Housing Act of 1968” obligation for HUD to administer its programs in a way that affirmatively furthers fair housing. According to HUD, the 2015 Affirmatively Furthering Fair Housing (AFFH) rule was to provide “program participants” (cities, counties, states, and public housing agencies; PHAs) “with an effective planning approach to aid them in taking meaningful actions to overcome historic patterns of segregation, promote fair housing choice, and foster inclusive communities that are free from discrimination.” (AFFH Rule)

During that same time, HUD encouraged program participants to collaborate in submitting a joint Assessment of Fair Housing (AFH) or a regional AFH. As a result, North Texas Regional Housing Assessment (NTRHA) was created in 2016 as a consortium of 20 Dallas-Fort Worth (DFW) cities and housing authorities to respond to the U.S. Department of Housing and Urban Development’s (HUD) requirement to complete an Assessment of Fair Housing (AFH). The City of Denton participated in the creation of this collaboration and was a member. “NTRHA contracted with researchers representing the Department of Civil Engineering and the College of Architecture, Planning and Public Affairs at the University of Texas at Arlington to complete the assessment on behalf of consortium members using HUD provided data and analytical tools supplemented by locally generated data.” (City of Denton Assessment of Fair Housing, p. 13)

However, the NTRHA project officially ended on May 23, 2018, when HUD Secretary Carson indefinitely suspended implementation of the 2015 Affirmatively Furthering Fair Housing (AFFH) rule reverting jurisdictions back to reporting requirements in place prior to the 2015 AFFH rule.
By October of 2018, North Texas Regional Housing Assessment (NTRHA) provided Community Development a draft report, *City of Denton Assessment of Fair Housing*. There was no opportunity to vet the report with the NTRHA assessment team or discuss jurisdictional approval. HUD made it clear that while the 2015 AFFH rule is suspended, jurisdictions are obligated to revert to using the Analysis of Impediments (AI) and reporting requirements in place prior to the 2015 AFFH rule.

**Analysis of Impediments (AI)**

AI is a separate document or combination of documents, and not submitted to HUD as a formal part of the ConPlan’s Annual Action Plan or Strategy. There is no specific guidance to suggest when an AI should be updated, but the City of Denton generally conducts a review and makes updates to our Fair Housing Plan (FHP) and AI when we update the ConPlan.

HUD’s *Fair Housing Planning Guide* defines an AI as:

1. A comprehensive review of a jurisdiction’s laws, regulations, and administrative policies, procedures, and practices.
2. An assessment of how those laws, regulations, and practices affect the location, availability, and accessibility of housing.
3. An assessment of conditions, both public and private, affecting fair housing choice for all protected classes. The protected classes under the “Fair Housing Act” are race, color, religion, sex, national origin, disability, and familial status (households with children).
4. An assessment of the availability of affordable, accessible housing in a range of unit sizes.

To HUD, analyzing fair housing impediments and taking appropriate actions means:

- Eliminating housing discrimination in the jurisdiction.
- Promoting fair housing choice for all.
- Providing housing opportunities for people of all races, colors, religions, genders, national origins, disabilities, and family types.
- Supporting housing that is structurally usable by all people, particularly those with disabilities.
- Fostering compliance with the nondiscrimination features of the “Fair Housing Act.”

The *City of Denton Assessment of Fair Housing* (AFH) draft report from NTRHA ([LINK](#)) provides the City with meaningful data and analysis that supports the process of updating the Fair Housing Plan and Analysis of Impediments (FHP-AI) as required by HUD. The data is consistent with the City’s 2020-22 ConPlan. The FHP-AI briefly summarizes the AFH’s and generates action items for the City to affirmatively furthering fair housing.
Results of the AFH are summarized as follows (AFH, 13):

- **Community participation** (AFH, 15) – NTRHA gathered information from the public, stakeholders, and subject matter experts through public meetings, focus groups, consultations, and surveys. Input was collected from hundreds of community members.

- **Assessment of past goals and accomplishments** (AFH, 37) – The City of Denton has made progress toward affirmatively furthering fair housing by developing affordable housing throughout the community, redeveloping aging and substandard housing, maintaining strong self-sufficiency programs, working through community partners to provide supportive services and improving the infrastructure of its organization.

- **Fair housing analysis** (AFH, 48) – Researchers studied census data, stakeholder and expert knowledge, and national, state, and local information sources to create an informed picture of fair housing conditions in the City of Denton. Study areas included racial and ethnic segregation, concentrations of poverty, housing problems for persons with disabilities, limited English proficiency, families with children, seniors and other protected classes to identify fair housing issues and barriers to access to opportunity.

- **Fair housing goals and priorities** (AFH, 227) – Researchers and leaders from the City of Denton identified priorities for action among fair housing issues identified through the research process and set long-range goals that addressed these issues.

**Issues**

AFH identified five fair housing issues that emerged in the North Texas Region (AFH, 13-14) from the analysis of local data and input from expert sources:

- **Segregation** – Residential segregation has grown worse since 1990, with a clear divide in the rural and urban areas.

- **Concentration of poverty** – Segregation has contributed to the emergence of an urban landscape that includes several neighborhoods with high poverty rates.

- **Location of publicly supported housing** – Subsidized housing options tend to be utilized in the same urban neighborhoods suffering the effects of increased segregation. This serves to exacerbate the trend.

- **Housing cost** – Home prices, apartment rents and property taxes continue to rise rapidly and exceed the capacity of many residents to afford housing, especially households with income at or below 30% of the area median income, persons with disabilities, persons living on fixed incomes and single-parent families with small children.

- **Access to employment** – Lower-income residents have limited access to affordable housing in proximity to good jobs with better wages. The lack of affordable transit options worsens this problem.
Participants also emphasized five additional issues in public engagement activities (AFH, 13):

- **Housing Subsidies Discrimination** – Most landlords will not accept renters paying with housing subsidies. Community opposition to the spread of affordable housing throughout Denton continues.
- **Lack of investment** – The tendency to overlook certain neighborhoods serves to exacerbate existing segregation and leave some areas behind. Failure to invest in the economic well-being of struggling neighborhoods leads to a lack of access to opportunity.
- **Lack of affordable housing** – Rising housing costs and limited access to housing assistance make it increasingly difficult for support and service workers, low-income families, and persons living on fixed incomes, including seniors and persons with disabilities, to find housing.
- **Lack of affordable transportation** – Affordable transportation options are not adequate to support participation in work, commercial and civic life, and recreation.
- **Lack of integrated, supported, affordable housing for persons with disabilities** – Most persons with disabilities find housing completely unaffordable, especially when compared with limited and fixed incomes.

**Goals**

Six goals were set to address issues in Denton (AFH, 14):

- Increase access to affordable housing in high-opportunity areas
- Increase supply of affordable housing units
- Increase supply of accessible, affordable housing for persons with disabilities
- Make investments in targeted neighborhoods to improve access to opportunity
- Increase access to information and resources on fair and affordable housing
- Increase supports and services for residents with housing assistance

The City of Denton is committed to affirmatively furthering fair housing for all persons. The AFH report highlights the importance of both access to opportunity and supply of affordable housing. As part of the community’s goal to assure every individual has safe, affordable housing with access to opportunity and supportive services, these six goals make up the foundation for the action in this plan.
FAIR HOUSING PLAN

Efforts to improve and expand existing programs that support access to opportunity and increase the supply of affordable housing to be implemented by the City using available resources.

INCREASE ACCESS TO AFFORDABLE HOUSING IN HIGH-OPPORTUNITY AREAS

Disparities in access to opportunity are the highest-ranked issue among HUD’s six major issues for Fair Housing Assessment as expressed by the public (AFH, 139). Areas of opportunity support achieving a high-quality of life (AFH, 182). To participants in the AFH, high opportunity areas include access to the potential for better jobs, schools, neighborhoods, healthcare, good roads, transit, and grocery stores. The most frequent theme expressed during public meetings regarding factors contributing to segregation in the Denton area is community opposition (AFH, 77).

Contributing Factors

- Location and type of affordable housing
- Lack of access to opportunity due to high housing costs
- Loss of affordable housing
- Source-of-income discrimination
- Community opposition
- Private discrimination
- Availability of affordable units in a range of sizes
- Displacement of residents due to economic pressures

Fair Housing issues

- R/ECAPS¹
- Access to opportunity
- Disproportionate housing needs
- Publicly supported housing
- Segregation

¹Racially or Ethnically Concentrated Areas of Poverty (R/ECAPs) HUD has defined a Racially or Ethnically Concentrated Area of Poverty (R/ECAP) as a census tract in which 50% or more of the residents are non-white (including Hispanic). Over 40% of residents have incomes falling below the US federal poverty rate (appropriate to their family size and composition) (HUD, 2016). As of 2015, one census tract in Denton meets the criteria for a R/ECAP, based on American Community Survey data. Shaded pink in the figure below that the R/ECAP tract is located in Denton’s Denia neighborhood and surrounded by West Hickory Street, South Bonnie Brae Street, Willowwood Street, and Kendolph Drive.
Proposed Actions

- Incorporate in Homebuyer Assistance Program training for realtors and lenders on strategies to help families make informed housing choices in high opportunity areas based on data and other information on neighborhood opportunity.
- Increase housing choice by increasing down payment assistance in the Homebuyer Assistance Program to bring down the overall home cost and make it affordable to lower AMI households.
- Through the Development Fee Grant Program and Affordable Housing Assessment, continue to work with the Denton Affordable Housing Corporation and other nonprofit developers to increase the supply of affordable, mixed-income, non-segregated housing units throughout Denton.
- Continue to seek out Funding, Programs, Advocacy tools, and Data sources that can help reduce barriers to development of affordable housing.

INCREASE SUPPLY OF AFFORDABLE HOUSING UNITS

During the participant meetings increasing the supply of affordable housing units and options would have ranked first if the goals were ranked by votes. There was a shift in construction because of the mortgage crisis on the national housing market, which placed an increased demand for multifamily apartments. Supply is now increasing, but the presence of large universities in the Denton market adds to the increase in the number of renters and ultimately made a higher percentage of residents cost-burdened (AFH, 44).

Contributing Factors

- Availability of affordable units in a range of sizes
- Location and type of affordable housing
- Lack of access to opportunity due to high housing costs
- Loss of affordable housing
- Community opposition

Fair Housing issues

- R/ECAPS
- Access to opportunity
- Disproportionate housing needs
- Publicly supported housing

The Denton Development Code policies adopted in 2019 by the City of Denton include policies to encourage the production and preservation of affordable housing such as Accessory Dwelling Units and flexible zoning through Overlays and Planned Developments. There appear to be no overt barriers to the development of affordable housing in Denton though the cost of
development is the most significant barrier to affordable housing development. Zoning issues, the local preference for affordable housing, high land and construction costs, lack of buildable land, and limited housing subsidy all impact housing costs. The City of Denton actively promotes fair housing to ensure that affordable units are available to all.

**Proposed Actions**

- Continue to provide a Housing Tax Credit Application in support of the development and preservation of affordable rental housing for low-income households. Developers requesting Housing Tax Credits (HTC) through the Texas Department of Housing and Community Affairs are encouraged to include units at all income ranges, including 0-30% and 31%-50%, and have resident services embedded in the housing or has a plan for connecting people to services.
- Complete the City’s first Affordable Housing assessment and utilize the assessment to help the City prioritize investment and incentive strategies to increase the supply of affordable housing, especially in high opportunity areas.
- Continuation of high performing housing programs designed to ensure that affordable, accessible housing is created and preserved in Denton.
- Seek opportunities to collaborate with housing services program providers who support the creation of new housing and preservation of existing affordable housing, the revitalization of low-income neighborhoods, and encourage homeownership for low and moderate-income homeowners.

**INCREASE SUPPLY OF ACCESSIBLE, AFFORDABLE HOUSING FOR PERSONS WITH DISABILITIES**

Efforts to improve and expand existing programs supporting affordable housing continue to be funded by the City. The City of Denton has acted in accordance with its policies to improve affordable and special needs housing. The following are some examples of the City’s affordable housing policy implementation.

- Monetary support from the City’s general fund for staff working with Federal grant programs, including CDBG and HOME. Specific programs administered by staff have included the City’s Homebuyers Assistance Program, Home Improvement Program, and the Minor Repair Program.
- Continued monetary support provided to the City’s only Community Housing Development Organization (CHDO), the Denton Affordable Housing Corporation (DAHC). DAHC currently provides ninety-two (92) affordable rental housing units to low-, very low- and extremely low- income families and individuals, including those with disabilities. Twenty-nine units are fully handicapped-accessible units offered at very affordable rents ($350-$625) to persons with physical disabilities.
- Provision of HOME funds for rental rehab of Fairoaks Denton, a HUD-subsidized senior housing development.
- Provision of City general funds to provide a Development Fee Grant program for nonprofit organizations that are developing affordable housing.
- Use of additional State funding to support accessibility home improvements for households with persons that have a disability.

In Denton County, approximately 15 percent of the population reports some type of disability in the 2016 American Community Survey (United States Census, 2016). Ambulatory disabilities remain widespread throughout Denton, 6%-11%. The greatest number appearing in neighborhoods with both white and non-white concentrations, and with higher proportions of older adults experiencing disabilities. Hearing disabilities also appear correlated with older adults with disabilities. Independent living and cognitive disabilities concentrate in southeast and northwest Denton (AFH, 198).

Home prices, apartment rents, and property taxes continue to rise rapidly and exceed the capacity of persons with disabilities, especially households with persons living on fixed incomes with income at or below 30% of the area median income.

**Contributing Factors**
- Lack of affordable, integrated housing for persons needing support services
- Lack of affordable, accessible housing for persons with disabilities
- Lack of affordable, in-home or community-based support services
- Lack of affordable, accessible housing in a range of unit sizes

**Fair Housing issues**
- Disabilities and access

**Proposed Actions**
- Continued HOME funding provided to the City’s Community Housing Development Organization (CHDO), the Denton Affordable Housing Corporation.
- Provision of City general funds to provide a Development Fee Grant to nonprofit organizations providing supportive services to persons with disabilities.
- Ensure efforts to increase supply of affordable housing units includes prioritizations for special populations including, persons with disabilities.

**MAKE INVESTMENTS IN TARGETED NEIGHBORHOODS TO IMPROVE ACCESS TO OPPORTUNITY**

The distribution of private investments, both in number and geographically, shape access to opportunity and the supply of affordable housing. The ability of residents to secure funding for
new homes or new businesses can restrict the likelihood of residents moving to new opportunities. The ability of residents to secure funding for new homes or new businesses can restrict the likelihood of residents moving to new opportunities. One way to measure this is to evaluate the amount and types of financial investments present in communities from local banking institutions (AFH, 70). Debt-to-Income Ratio is the number one reason for loan denials in all five race categories in Denton County (AFH, 71).

**Contributing Factors**
- Lack of public or private investments in specific neighborhoods, including services or amenities
- Lack of revitalization strategies

**Fair Housing issues**
- Access to opportunity
- Segregation
- R/ECAPs

**Proposed Actions**
- Complete the City’s first Affordable Housing assessment and utilize the assessment to help the City prioritize investment and incentive strategies to increase the supply of affordable housing primarily in high opportunity areas.
- Access, or initiate, local networks of collaborators working on complex social issues to create a strategy to improve access to opportunity for residents of targeted neighborhoods.
- Although extensive housing, economic development, and public projects are not possible with the available federal funding allocation, efforts to invest these funds in public improvement projects in target residential areas will continue.
- Coordinate with transportation (DCTA) to improve access to transit resources (bus stops, route locations, and schedules, and covered bus stops to provide shelter in inclement weather)

**INCREASE ACCESS TO INFORMATION AND RESOURCES ON FAIR AND AFFORDABLE HOUSING**
No comments regarding fair housing enforcement, outreach capacity, and resources were received during public participation (AFH, 225). The AFH found that the City of Denton’s commitment to fair housing has demonstrated our ability to contribute to solutions that further fair housing in Denton (AFH, 45).

**FAIR HOUSING ACTIVITIES**
Over the past several years, the primary emphasis regarding fair housing activities in Denton has included the following:

- Development and maintenance of affordable housing;
- Educational activities;
- Support of a local community housing development organization (CHDO);
- Planned assistance to residents requesting to file a complaint with the Dept. of Housing & Urban Development, Fair Housing Office;
- Translation of program and legal documents into Spanish;
- Program information provided in quarterly English/Spanish newsletters;
- Advertisements, published weekly in the local newspaper, the Denton Record-Chronicle, provide fair housing contact information.
- Training local lenders and real estate professionals involved in the City’s Homebuyers Assistance Program to support fair lending and fair housing practices.
- Evaluation of actions taken by the City of Denton to affirmatively further fair housing and reported in the annual “Consolidated Annual Performance and Evaluation Report.”

**FAIR HOUSING COMPLAINTS**

City Community Development staff provides information and assistance to complainants regarding the appropriate forms and how to file a fair housing complaint with the U.S. Department of Housing & Urban Development’s Fair Housing office. Information regarding how to contact other local agencies that provide support for Fair Housing and Landlord Tenant relationships is also provided. A resource referral list is available on the Fair Housing page of the City’s website.

During the span of the 2015-2019 Consolidated Plan, the City made no Fair Housing complaints to HUD or assisted with any complainant reporting to HUD. It would be unknown if anyone reported to HUD outside of contacting the City directly. A determination was made that none of the calls were related to Fair Housing discrimination based on the protected classes race, color, national origin, religion, sex, family status, or disability, after staff review of complaints. In all cases, regardless of staff assessment, staff offers to assist the caller with filing a report to HUD. Staff defines most calls as landlord/tenant issues related to eviction, health code, ADA accessibility, and potential code violations. More commonly, calls are related to increases in rent, lease renewals, evictions, late fees, etc. These are deemed by staff to be civil matters between the tenant and landlord where the City has no authority. Generally staff will refer to service providers. On occasion, staff will refer to Legal Aid of Northwest Texas, or the Texas Tenants Union when there is a lease or legal issue described. Staff also refers callers to the City’s Community Improvement Services for rental unit inspection on repair and maintenance issues not related to evictions.
Contributing Factors
- Lack of awareness

Fair Housing Issues
- Fair housing enforcement

Proposed Actions
- Support training opportunities on the City’s programs and Fair Housing for local real estate professionals, property owners, and managers.
- Provide support (letters, endorsements, financial, etc.) for local fair housing groups' education and/or local fair housing groups' fundraising efforts
- Identify trusted community partners who can assist with implementation of the City’s fair housing goals to expand fair housing outreach, education, and training for targeted populations through collaborative strategies.
- Complete the City’s first Affordable Housing assessment and incorporate assessment planning meetings with community stakeholders in multiple sectors to enhance their knowledge and support for affordable housing and fair housing goals.
- Attend HUD-sponsored or other fair housing training when available to keep staff apprised of any recent changes to fair housing laws or requirements as they relate to Community Development programs.

INCREASE SUPPORTS & SERVICES FOR RESIDENTS WITH HOUSING ASSISTANCE
The AFH noted several positive factors, including relatively easy access to jobs, relatively little poverty nearby, low transit costs, high-quality schools nearby, and low exposure to environmental hazards. However, those receiving housing assistance or living in subsidized affordable rental housing may still experience disparities in access to opportunity in some of the AFH indices examined.

“The ability of HCV families to secure housing in integrated, opportunity-rich neighborhoods is not only affected by market constraints but also by the ability to use and access information, as well as by discrimination.” Further, “HCV families tend to be disproportionately members of protected classes under the Fair Housing Act and other laws prohibiting discrimination” (AFH, 173).

The AFH provided the average index scores for races and ethnicities for both the overall population and population below the federal poverty level in Denton. (AFH, 135). Ratings specific to residents with housing assistance by index and any disparities are summarized next.

\(^2\)Indecies: Low Poverty, School Proficiency, Labor Market, Transit, Low Transportation Cost, Jobs Proximity, Environmental Health
Location of Publicly Supporting Housing
The location of publicly supported households including voucher-subsidized households, public housing developments, LIHTC, and concentrate in adjacent census tracts in the east and southeast Denton near I-35E (AFH, 182).

Jobs
The jobs proximity index uses high scores to indicate high access to jobs and low scores to indicate low access. North Denton scores show low proximity to jobs (0%-60%) in some of the census tracts with the highest rates of voucher holders. Southeast Denton, which contains most publicly supported housing developments, appears to have strong jobs proximity index scores. Some LIHTC units inside SH 288 also appear in census proximity scores. (183).

Health
The environmental health index measures air quality based on federal standards. A comprehensive data set for Denton for this index was not available. However, the available recorded information shows extremely low environmental health scores in north and central Denton. Where data exists, publicly supported housing appears in census tracts with low or very low scores (AFH, 183).

Poverty
The low poverty rate index measures the population below the federal poverty rate in a given census tract, where higher scores mean less poverty. The census tract in central Denton that has a R/ECAP designation had very low scores. In census tracts with high HCV use and/or LIHTC properties, the low poverty rate index appears poor to moderate (AFH, 183).

Schools
The school proficiency index scores the level of access to high-performing elementary schools. This index uses data on the performance of fourth-grade students on state reading and math proficiency exams to determine areas with high-performing elementary schools within three miles of the center of the block group. The census tracts in east and southeast Denton that contain most of the HCV users and LIHTC properties have at least moderate school proficiency index scores, and most have high scores (AFH, 184).

Labor
The labor market engagement index provides a summary outlook of the residents’ participation in the labor market as a result of the combination of census tract rates of education, unemployment, and labor force participation. The R/ECAP location and the census tracts in southeast and east Denton with most of the LIHTC properties plus many of the HCV users do not fare well on this index. These locations have some moderate scores, but they also have some poor and very poor scores (AFH, 184).

Transportation
Transportation was evaluated in two ways, by transit trips and transportation cost. The transit trip index uses estimates of the number of transit trips taken by a three-person single parent household whose income is equal to 50% of the median income for renters in the DFW region. The higher the index value, the higher the likelihood that neighborhood residents will use public transit. Overall, Denton residents have a relatively low propensity to use public transit. In most places in Denton, the scores are low. In the areas where large numbers of voucher holders reside, the scores appear somewhat higher (AFH, 184).
Contributing Factors

- Admissions and occupancy policies and procedures, including preferences in supported housing
- Impediments to mobility
- Displacement of residents due to economic pressures
- Availability, type, frequency, and reliability of public transportation
- Community opposition

Fair Housing issues

- R/ECAPS
- Access to Opportunity
- Disproportionate Housing Needs
- Publicly Supported Housing

Proposed Actions

- Coordinate with Denton County Transportation Authority (DCTA) to improve access to transit resources (bus stops, route locations, schedules, and covered bus stops to provide shelter in inclement weather)
- Continuation of housing programs designed to ensure that affordable, accessible housing is available in Denton.
- Improve the housing crisis response system programs, including street outreach, emergency short-term supportive housing, rapid rehousing, and permanent supportive housing to people experiencing or at-risk of homelessness.

CONCLUSION

The AFH identified six (6) goals for the City of Denton. The FHP-AI examined those contributing factors and fair housing issues (AFH, 232-234). The regional AFH also reported that Denton outperforms the region number of indices. In addition, Denton has more affordable units than other Denton County jurisdictions. This has supported diversity in the population. However, the AI identified issues. The proposed action in this FHP support local activities to meet needs in the community without regard to race, religion, ethnicity, gender, disability, or family status. The City of Denton will continue to work in partnerships with a diverse group of collaborations, organizations including surrounding local governments and the North Central Texas Council of Governments, to support fair housing in all North Texas communities.
In accordance with the applicable statutes and the regulations governing the Consolidated Plan regulations, the City of Denton, as a grantee of the U.S. Department of Housing and Urban Development, certifies that it will affirmatively further fair housing through the following activities:

1. The City of Denton has conducted an analysis of impediments to fair housing choice within the jurisdiction.

2. The City of Denton has taken appropriate actions to overcome the effects of any impediments identified through the analysis.

3. The City of Denton will maintain records reflecting that analysis.

4. The analysis will be updated as needed when the City’s Consolidated Plan, Comprehensive Plan, and Development Codes are revised and adopted.

Signature of Authorized Official

__________________________

Date

Todd Hileman, City Manager

Name and Title of Authorized Official
WHEN WE EMBRACE DIVERSITY, WE BUILD STRONGER COMMUNITIES.

Studies show that diversity helps broaden children’s social networks by creating opportunities for interaction across racial and ethnic lines. And that in turn contributes to greater tolerance, fair-mindedness and openness. Housing discrimination deters the creation of diverse communities. The federal Fair Housing Act prohibits discrimination because of race, color, religion, national origin, sex, familial status or disability. To file a discrimination complaint or to learn more about fair housing and diverse communities, contact HUD or your local fair housing center.

Visit hud.gov/fairhousing or call the HUD Hotline 1-800-669-9777 (English/Español)

FAIR HOUSING IS YOUR RIGHT. USE IT!

A public service message from the U.S. Department of Housing and Urban Development in partnership with the National Fair Housing Alliance.
SURVEY SUMMARY
Every three to five years, the City of Denton is required by the Department of Housing and Urban Development (HUD) to create a Consolidated Plan. In the plan, the City outlines how it will spend an estimated $1.5 million received annually from HUD as a formula grant. As a part of this effort, the City is required to conduct community outreach to determine community priorities for housing and community development needs.

This year, the City undertook a large citizen participation endeavor that included online and paper surveys about priorities for the HUD funding. The survey was sent to City Council, citizens, committee members, local churches, participation loan officers and realtors, neighborhood associations, and social services agencies for distribution to their networks. Staff also held two public hearings dedicated to the Consolidated Plan and HUD funding with community partners and attended a variety of coalition meetings and attended the City’s annual “State of the City” community event to engage the City of Denton residents. Through this outreach, the City staff received 170 surveys.

The City collected surveys from November 2019 through January 31, 2020, which generated 170 responses in total. Questions focused on housing and community development needs. Community Development utilized social media, Constant Contact, Denton Record Chronicle, Denton DTV, and printed posters and fliers.

A detailed summary of the survey results follows. City staff will utilize these results and other stakeholder input to develop the strategic plan that will be included in the 2020/22 Consolidated Plan.

METHODOLOGY
The survey was distributed both in-person and online to reach a variety of respondents. While the City wanted to engage all residents in Denton, a special emphasis was placed on reaching the low-income residents since funding is intended to assist. This survey is not scientific in nature.

The survey included a variety of housing and community needs in seven categories: Community Facilities, Infrastructure, Special Needs, Community Services, Neighborhood Services, Business and Jobs, and Housing Assistance. Under each need, the respondent ranked the needs from “1 point” for the lowest need to “5 points” as the greatest need. Survey respondents ranked each need based on their thoughts on the needs of the City of Denton. Using a weighted average method, the sum of all points was then calculated and divided by the total number of respondents, resulting in a score between one and five points.
The higher the average score, the greater the need. Respondents also had an opportunity to include other community needs. The additional comments are included at the end of the survey results. At the end of the survey, respondents had an opportunity to provide additional information about themselves, such as the following: 62 years or older, 18 years and older, disabled, head of household, and zip code of residence. Respondents were able to select any of the above that applied to them. The results of those questions are below.

Of the 170 survey respondents, 14.11% were 62 years or older, 81.60% were 18 years or older, 9.82% were disabled, and 45.40% were head of household.

Of the 170 survey respondents, 16% resided in the 76201 zip code, 1% in the 76202 zip code, 16% in the 76205 zip code, 11% in the 76207 zip code, 7% in the 76208 zip code, 25% in the
76209 zip code, and 13% in 76210 zip code. The remaining 10% of the respondents were from outside of the city limits.

**COMMUNITY FACILITIES NEED CATEGORY**
For the community facilities category need, the top three were health care facilities ranked highest at 3.84 out of 5 points, followed by child care centers (3.83) and youth centers (3.77). The other needs were ranked at 3.73 or below.

**INFRASTRUCTURE NEED CATEGORY**
For the infrastructure category need, the top three were health care facilities ranked highest at 4.29 out of 5 points, followed by sidewalks improvements (4.10), and accessibility improvements (3.90). The other needs of drainage and water/sewer improvements were ranked at 3.45 or below.
SPECIAL NEEDS CATEGORY
For the special needs category, the top three were services for neglected/abused children ranked highest at 4.13 out of 5 points, followed by homeless services/shelters (4.07), and family self-sufficiency services (3.93). The other special needs of domestic violence services, substance abuse services, centers/services for disabled, HIV/AIDS services were ranked at 3.82 or below.

COMMUNITY SERVICES NEEDS CATEGORY
For the community services needs category, the top three were mental health services at 4.29 out of 5 points, followed by transportation services (3.94), and health services (3.86). The other community services needs of youth activities, child care services, legal services, anti-crime programs, and senior activities were ranked at 3.80 or below.
NEIGHBORHOOD SERVICES NEED CATEGORY
For the neighborhood services needs category, the top three needs were trash and debris removal at 3.56 out of 5 points, followed by parking facilities (3.35), and code enforcement (2.75). The other neighborhood services needs of graffiti removal and demolition programs were ranked at 2.66 or below.

BUSINESS AND JOBS NEEDS CATEGORY
For the business and job needs category, the top three needs were job creation/retention at 3.80 out of 5 points, followed by employment training (3.65), and small business loans (3.37). The other business and job needs of start-up business assistance, business mentoring, commercial rehabilitation, and façade improvements were ranked at 3.21 or below.
**HOUSING ASSISTANCE NEEDS CATEGORY**

For the housing assistance needs category, the top three needs were emergency homeless shelter at 3.97 out of 5 points, followed by energy efficiency improvements (3.91), and housing for foster youth (3.78). The other housing assistance needs were ranked at 3.75 and below.

![Housing Assistance Needs Chart]

**ALL HOUSING AND COMMUNITY NEEDS**

For the 57 housing and community needs, the top twenty needs are as follows:

<table>
<thead>
<tr>
<th>Need</th>
<th>Score</th>
</tr>
</thead>
<tbody>
<tr>
<td>Street Improvements</td>
<td>4.29</td>
</tr>
<tr>
<td>Mental Health Services</td>
<td>4.29</td>
</tr>
<tr>
<td>Neglected/Abused Children Services</td>
<td>4.13</td>
</tr>
<tr>
<td>Sidewalk Improvements</td>
<td>4.10</td>
</tr>
<tr>
<td>Homeless Services/Shelters</td>
<td>4.07</td>
</tr>
<tr>
<td>Emergency Homeless Shelter</td>
<td>3.97</td>
</tr>
<tr>
<td>Transportation Services</td>
<td>3.94</td>
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<tr>
<td>Family Self-Sufficiency Services</td>
<td>3.93</td>
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<tr>
<td>Energy Efficiency Improvements</td>
<td>3.91</td>
</tr>
<tr>
<td>Accessibility Improvements</td>
<td>3.90</td>
</tr>
<tr>
<td>Health Services</td>
<td>3.86</td>
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<tr>
<td>Health Care Facilities</td>
<td>3.84</td>
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<tr>
<td>Child Care Centers</td>
<td>3.83</td>
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<tr>
<td>Domestic Violence Services</td>
<td>3.82</td>
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<tr>
<td>Youth Activities</td>
<td>3.80</td>
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<tr>
<td>Job Creation/Retention</td>
<td>3.80</td>
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<tr>
<td>Substance Abuse Services</td>
<td>3.79</td>
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<tr>
<td>Housing for Foster Youth</td>
<td>3.78</td>
</tr>
<tr>
<td>Youth Centers</td>
<td>3.77</td>
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<tr>
<td>Child Care Services</td>
<td>3.76</td>
</tr>
</tbody>
</table>

The other housing and community needs were ranked at 3.75 and below.
WRITTEN COMMENTS
The following written comments were made on the survey:

1. Demolish Rayzor Ranch
2. n/a
3. I would like to see Denton make efforts to incorporate native species of flora in city-planning through the implementation of female tree plantings and bioswale (rain filtration gardens) construction to combat runoff pollution & bolster pollinator species and wild fauna, planting food & medicinal plants for public harvesting. Would also like to see more bus routes and train access. 
   DENTON MUST PROVIDE RECYCLING TO ALL RESIDENTS AND STOREFRONTS. Since I moved here, every friend I’ve met did not have recycling pickup available at their house and seems that the recycling centers do not get picked up sometimes. Once recycling pickup is available everywhere, encourage residents to start recycling. In Richardson and North Dallas they did this by mailing every house and business a letter with a voucher for free recycling bags available for pickup at city offices and rec centers. free/public and affordable housing is very important to continue adding to in my opinion
4. Low income housing more of it and more assistance programs
5. Public transportation Better mental health services Better maternal health services Quality, affordable health care Quality, affordable education Pre-K through College Better air quality - currently an F minus rating Government officials who are more responsive to the needs of the community Better intergovernmental cooperation
6. Finish construction faster.
7. I don’t want my tax dollars spent on social service programs. That’s the feds and state’s responsibility, not Denton’s. Stick to providing traditional core city services.
8. WE TAXPAYERS are FED UP WITH FUNDING FREE SERVICES -- STOP ASKING!!
9. Let’s stop outside companies coming in and building large complexes of substandard housing under the umbrella of "student housing". JUST STOP. You are ruining Denton.
10. Street diets with bike lanes!
11. Daytime homeless facility.
12. more crosswalks
13. This community needs affordable rental prices. The rent prices are getting ridiculous! This is a college town, so they raise prices trying to get $600 to $900 per bedroom but for a family who needs bedrooms for their children won’t have roommates to help pay the high rent. So landlords need to stop up-pricing rentals per bedroom or the homeless crisis will just keep getting worse. Families are in crisis here because they can’t pay such high rent.
15. N/A
16. Public transportation
17. Stop UNT from controlling Denton! One year we had to have a parking pass to park in front of our homes. We no longer have easy access to 35. The MESS left after games at UNT on the neighborhood streets is ridiculous.
18. Increased crime watches programs. As our city is growing, so too has our crime rate.
19. Better communication between the city and residents of rental housing (apartments, homes, etc.), especially if the city needs to do nearby repairs that cause the water to be randomly turned off without any kind of notification to the residents.

20. We do not any assistance programs for people who buy houses as rental investments but need to drive down property values so that the average family can afford to buy one. Full stop. The rental insanity going on in Denton today is destructive and harmful.

21. public transportation is missing from the survey. Your Mobility plan is for cars with one driver only. Small town thinking

22. City council that works together

23. Stop parenting the public. We don’t want to pay for it!

24. Artist Enclave. Band Shell on the Courthouse on the square (perhaps in the burnt out old mini mall RIP)

25. Smart expansion planning, roads roads roads, focus on renewable resources.

26. Transportation for elderly and disabled for medical, food, shelter

27. A community day shelter would be very nice for the people without a place to go. With programs to help them get back on their feet.

28. Denton has been home since 2003. It looks dirty. It looks old. The mall is sad. Attract higher end quality builders like the ones in every other city that surrounds Denton. In 25 years all the DR Horton neighborhoods will be neglected, and Denton will be full of crime from people moving to low cost housing.

29. SIDEWALKS, EMERGENCY HOMELESS SHELTERS, AND STOPPING THE OPEN-DOOR TRAIN OF HOMELESS FROM COLLIN/DALLAS TO DENTON.

30. Please consider community grant programs that leverage local community dollars into neighborhood transformation by encouraging many people to invest in improvements in their own property, like this: https://www.oswegonyonline.com/

31. Another library branch, maybe a children's library in the mall?

32. Assistance with pet deposits and housing that has no weight limit or species restrictions. Hundreds of animals get surrendered to the City Animal Shelter and puts a bigger burden on city resources when people cannot bring their pets with them when they move. From cats to large breed dogs to bully breeds - these animals end up at the shelter because people have nowhere to take them. Also, temporary housing for homeless who have pets. The only homeless shelter in town that will take pets in Monsignor King and they have limited space. These people need a place to keep their pets when they try and go in for job interviews or if they need a place to sleep for the night. Many homeless will sleep on the street in the freezing cold or extremely hot weather because their pets were turned away at a homeless shelter.

33. Get a handle on the towing scams going on in this city.

34. The need now homeless need homes, jobless need jobs, stop hiring and housing prerequisites, now.

35. Assistance for veterans/disabled veterans

36. Benches at bus stops for those of us who cannot stand for long periods of time.


40. More affordable housing for seniors.
41. Stop the construction. Stop the influx of people. Instead of listening, prioritizing and letting capitalistic developers set the agenda for the area, listen to what residents want instead. Long term Dentonites should be rewarded rather than see the quality of life they once knew dissipate away to overcrowding and vested interests who see Denton only as a dollar sign.
42. Low barrier emergency shelter beds that do not put limit on # of nights one can stay; people who are unemployed or who are using drugs need a place to stay as well in order to take those next steps toward finding employment, quitting drugs, etc. I have met many people don’t have a place to stay at night due to the shelter’s employment/drug barriers, restrictions on number of nights one can stay, and limited operating hours.
43. To take less time repairing vital roads like Hickory, Oak, and definitely 35
44. https://mlf.org/community-first/
45. Wraparound case management for youth K-12
46. Overall, affordable resources are needed.
47. Resources for schools and children.
48. There continues to be a need for supportive services for children and youth living in poverty, including educational and mental health support.
49. Supporting local food banks
50. I think we also need to look at our partnerships with TXDOT and re-evaluate how we as a community are working with external partners. This survey talks about accessibility, drainage but many of the service roads that are “TXDOT’s responsibility” and are under construction have had zero curbs or sidewalks added, there’s no help for drainage, and we’ve made moving through the community more dangerous. Other communities in DFW have had better outcomes from construction with the state than we have - why are they successful and we aren’t?
51. We need sidewalks on residential streets, especially near schools, shopping, and public services - anywhere people might choose to walk if it were safer. We need affordable housing and a serious solution to the homeless problem. We spend too much money on police calls when we could use funds to provide apartments for people who need them. --- On a separate note, years ago I took a first-time homebuyers class funded by CDBG and it was immensely helpful. I bought a house based on what I learned and have been living in it for 16 years.
52. Sustainable homes that are environmental, social and economic friendly
53. Lessening police involvement in everything worked be a good thing.
54. It was mentioned earlier, substance misuse resources is needed badly for neighbors experiencing homelessness. Also, I believe a Community Court system would be beneficial in helping them with accountability as well as cleaning up their own trash and giving back to the community instead of lengthy jail time. Thanks!
55. Na
56. Better trash pickup service, these new regs which force citizens to go to the dump are BS! Every other city picks up trash to avoid it hanging around people's homes. Denton should pick up large items not in trash cans!
57. Affordable SFR for sale, not all in one cluster of a neighborhood.
58. Better balance between growth and existing/improving facilities. There is so much scheduled growth and not enough Infrastructure. Rather spend to improve than encourage more growth.
59. Arboreal corridors/green spaces * Community arts/beautification
60. LGBTQ youth services
61. Racquetball Court,
62. Bike lanes and connected trails.
63. No rental control, landlords in the city hold a lot of power over single parent households or low income families. Nothing gets done to regulate the high prices of rentals for the low quality of household living. Families are also not allowed to buy homes as other landlords continue to outbid them in cash making impossible for small families with low income to get permanent or quality housing in Denton.
64. We need to improve the streets and get a plan to move the homeless out of downtown Denton.
65. Parks and alternative transportation options, bike lanes, sidewalks, and bus shelters
66.
67. CDBG and HOME funding should be used primarily for housing and human services. Parks, streets and other public facilities in low-income neighborhoods should be improved with funding other than from these sources.
68. Senior affordable housing
69. Stop giving tax relief and abatements to developers and big businesses, especially tacky gas stations and cut-rate retail and grocery outlets.
70. I would like to see the City support small business development beyond the square
71. Using the funding to fully annex Green Tree Estates to city water and trash.
72. Fire & Police increase
73. None
74. Pipeline program for minority students to attend college for law/legal affairs, medical field, and business ownership. Then find ways to retain these individuals who obtain the knowledge to give back to the community.

Consolidated Plan:
The 2020-22 Consolidated Plan includes analysis of housing and community development data provided by HUD for consolidated planning that informs the priorities, strategies, and actions that the City will undertake to address housing and community development needs over the next three years.

Action Plan:
The 2020 Action Plan is the City’s annual application for federal funds from the U.S. Department of Housing and Urban Development. Funds available in Community Development Block Grant (CDBG), HOME Partnership Investment Program (HOME), Community Development Block Grant – CARES Act (CDBG-CV), and local program income are $2,405,252. The City plans to undertake the following activities during the 2020 program year to assist low and moderate-income persons:

Projects:
- Community Development Administration $270,493
  Home Improvement Program $464,441
  Minor Repair Program $250,000
  Homebuyer Assistance Program $120,634
- Denton Affordable Housing Corp
  Rental Rehabilitation $80,000
- Denton City County Day School $38,000
- Denton City County Day School Phase 2
  Playground Improvements $110,916
- Denton County Friends of the Family $40,000
- City of Denton Parks & Recreation Department
  Carl Young Park Trail Lighting Project $44,000
  Quakertown Playground Improvements Phase 2 $195,000
  Summer Kids Camp $30,000
- Serve Denton ADA Sidewalk Project $43,923
- Special Programs for Aging Needs $14,769
- The Salvation Army of Denton $35,000
- CDBG-CV (CARES ACT) Unprogrammed Funds $618,736
- Unprogrammed Funds $49,340

Total Funds $2,405,252

Amendment:
The City of Denton is amending 2015, 2017, 2018, and 2019 Action Plans to reallocate a total of $27,172 in CDBG funds and $114,195 in HOME funds. The minor amendments for 2015, 2017, and 2018 Action Plans are for CDBG residual funds available from completed projects and include $2,393 in 2015 funds, $1,040.49 in 2017 funds, and $23,738.25 in 2018 funds. The substantial amendment for the 2019 Action Plan is to allocate a total of $114,195 in HOME funds that were not programmed.
Consolidated Plan for Housing & Community Development and Action Plan

The City of Denton's Community Development team is seeking citizen participation in the development of the Consolidated Plan for Housing and Community Development, the Annual Action Plan, Citizen Participation Plan (COD CPP), and the Fair Housing Plan and Analysis of Impediments (FHP-AI).

The 2020-22 Consolidate Plan examines the community needs, resources, priorities, strategies, and goals the City will address over the next three years. The 2020 Action Plan is the City’s annual application for federal funds and a list of projects that will receive funding in the 2020 program year.

Citizen participation is needed!

Help ensure our community needs are being addressed by reviewing the documents listed below and providing input at an upcoming Public Hearing. This engagement helps prioritize community development actions and the process allows for more effective planning for Denton’s CDBG and HOME program activities.
Review 2020-2022 Consolidated Plan and 2020 Action Plan


The City’s Consolidated Plan and annual Action Plan activities are developed in collaboration with local citizens, coalitions and collaboratives, nonprofit organizations, educational community, elected leaders, council appointed citizen advisory committees, and other community stakeholders.

During the 30-day comment period citizens and organizations can provide comments on activities to Community Development in the following ways:

- Mail to 601 E. Hickory St., Suite B., Denton, TX 76205
- Schedule an appointment (under current facility operations due to COVID-19)
- Phone (940) 349-7726 or fax to (940) 349-7753
- Email to CommunityDevelopment@cityofdenton.com

Public Hearings:
Traductores de español estarán disponible

The purpose of the public hearing is to receive citizen input on the Consolidated Plan for Housing & Community Development and Action Plan and to hear your views on the proposed projects and how the City of Denton plans to spend funding from the U.S. Department of HUD.

View Public Notice and Proposed Projects
COVID-19 RESPONSE: VIRTUAL MEETINGS

Interested parties should visit www.cityofdenton.com or call (940) 349-7725 for more information on the Council meeting format and how to participate.

Read more about current Community Development activities, and share the City of Denton 2020-2022 Consolidated Plan and 2020 Action Plan with the community.

The deadline for submission of comments is June 30, 2020

ADA/EOE/ADEA ~ TDD (800) 735-2989
www.cityofdenton.com/communitydevelopment
Provide Input for the City of Denton’s 2020-2022 Consolidated Plan & 2020 Action Plan for Housing & Community Development

We are seeking your input. The City of Denton’s 2020-2022 Consolidated Plan and the 2020 Action Plan for Housing and Community Development are available for citizen review from Jun. 1 to Jun. 30, 2020. The 2020-22 Consolidate Plan examines the community needs, resources, priorities, strategies, and goals the City will see more...

2020-2022 CONSOLIDATED PLAN & 2020 ACTION PLAN

Community Development | City of Denton
The City of Denton encourages participation on boards and commissions that advise the City.
We are seeking your input. The City of Denton's 2020-2022 Consolidated Plan and the 2020 Action Plan for Housing and Community Development are available for citizen review from Jun. 1 to Jun. 30, 2020. The 2020-22 Consolidation Plan examines the community needs, resources, priorities, strategies, and goals the City will address over the next three years. To see how to provide input, visit bit.ly/3gRXusc.
The City of Denton's 2020-2022 Consolidated Plan & the 2020 Action Plan for Housing & Community Development are available for citizen review until June 30. These plans examine community needs, resources, & priorities for the next 3 years. Provide input: bit.ly/3gRXusc.
Texas Balance of State Continuum of Care Consultation.

- **CoC Consultation 1** Q: Why there's a 3% reduction of funds in years 2 and 3? A. Based on reduction to HUD funding, in our previous 5-year Con Plan, we budgeted 3% reductions, but the City received modest increases. Therefore, the draft 2020-2022 Con Plan now conservatively assumes level funding over three years.
- **CoC Consultation 2** Comment: Answers to Homeless Strategy (SP-60) were especially robust.
- **CoC Consultation 3** Comment: It's such a pleasure to read how all of you in Denton are working to bring homelessness, housing, and supportive services together; yours is the most integrated community that I've read about in Con Plans.
- **CoC Consultation 4** Q: Don't see in your plan, information about how many students are identified by Denton's schools and Homeless Education Liaisons as experiencing homelessness. A. Thank you. It is a helpful comment. Staff agrees it is a data point that reflects the number of families with children at-risk of homelessness. That data is tracked in the Data Dashboard referenced in the Con Plan, but the City will consider how it might integrated it into the narrative before the plan is finalized.

No other comments were received during the 30-day comment period.