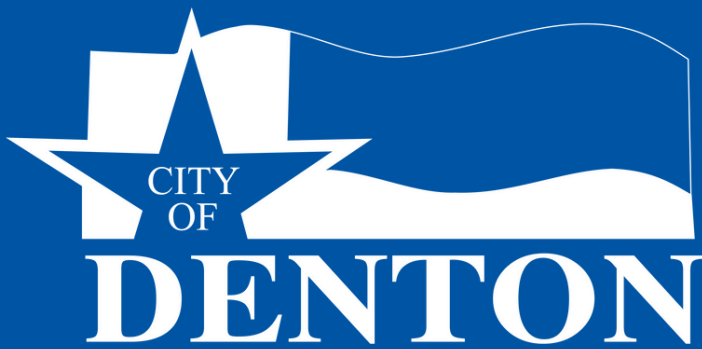


2023-2027 City of Denton Consolidated Plan

FOR HOUSING
& COMMUNITY DEVELOPMENT



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

DRAFT: May 15, 2023



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- Approval on

HUD APPROVAL:

- Submitted
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2023–2027 City of Denton Consolidated Plan

FOR HOUSING
& COMMUNITY DEVELOPMENT

EXECUTIVE SUMMARY

HOUSEHOLDS	PRIORITY
281	AFFORDABLE HOUSING
2,105	MAKING HOMELESSNESS RARE, BRIEF & NONRECURRING
2,335	PUBLIC SERVICES
40,000	PUBLIC FACILITIES, IMPROVEMENTS & INFRASTRUCTURE

**A REPORT FOR THE U.S. DEPARTMENT OF HOUSING &
URBAN DEVELOPMENT**

Community Development Block Grant (CDBG) Program
HOME Investment Partnership (HOME) Program

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 low- 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 ConPlan 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 I 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 Gonzales 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, the City will be implementing a five-year Con Plan cycle for program years (PY)¹ including PY2023, PY2024, PY2025, PY2026, and PY2027. This Con Plan document follows the HUD prescribed sections and formatting.

¹The City's program year (PY) is October 1 – September 30. The funding awarded for CDBG and HOME projects begins on October 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.

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 five 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 of ***social determinants of health (SDOH)***. ***SDOH are the conditions in the environments where people are born, live, learn, work, play, work, and age that affect a wide range of health, functioning, and quality-of-life outcomes and risks. The following are social determinants of health:***

1. Economic Stability
2. Education Access and Quality
3. Health Care Access and Quality
4. Neighborhood and Built Environment
5. Social and Community Context

3. Evaluation of past performance

The City's activities to meet the goals in the 2020-2022 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 2020-2022 Consolidated Plan five-year goals. Below is an overview of the proposed goals and the actual accomplishments including a completion rate. During the last three years, the Con Plan goals were focused on affordable rental housing preservation (102 household housing units), home repair (93 household housing units), homeownership (4 household housing units), public facility improvements (74,239 persons assisted), and public services activities (2,020 persons assisted) with an emphasis on homeless assistance (6,108 persons assisted).

Goal	Unit of Measure	2020-2023 Con Plan Goals	2020-2023 Actual Accomplishments*	Percent Complete
Affordable Rental Units Denton Affordable Housing Corporation, Fair Oaks (Section 202)	Household Housing Units	102	43	42.2
Homeless Assistance and Prevention Denton County Friends of the Family, The Salvation Army	Persons Assisted	7560	6108	80.8
Homeownership Assistance	Household Housing Units	12	5	41.7
Housing Rehabilitation	Household Housing Units	9	93	1033.3
Public Facilities and Infrastructure Improvements	Persons Assisted	24,000	74239	309.3
Public Services Summer Kids Camp, Denton City County Day School, Health Services of North Texas, SPAN Inc.	Persons Assisted	4,500	2020	44.9

*Accomplishments reported as of April 30, 2023 for a total of 2 years and 6 months.

4. Summary of citizen participation process and consultation process

The Consolidated Plan requirements for citizen participation and consultation are set forth in the Code of Federal Regulations Subpart B of 24 CFR Part 91, "Consolidated Submissions for Community Planning and Development Programs." (Consultation, [24 CFR § 91.100](#) and Citizen Participation, [24 CFR § 91.105](#))

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: [add link to 6/6/23Public hearing]. 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 2023-2027 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 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 2013-2017 Comprehensive Housing Affordability Strategy (CHAS) and the 2013-2017 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 2023-24 formula allocation for the City of Denton for the Community Development Block Grant program is \$964,531 and the HOME allocation is \$513,327. The City anticipates approximately \$5,000 in CDBG program income and \$68,355.93 in actual HOME program income. The City also has \$35,547.19 in CDBG in prior year resources for reallocation as a Minor Substantial Amendment. Additional local resources are leveraged to fund programs.

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2023–2027 City of Denton Consolidated Plan

FOR HOUSING
& COMMUNITY DEVELOPMENT

THE PROCESS

HOUSEHOLDS	PRIORITY
281	AFFORDABLE HOUSING
2,105	MAKING HOMELESSNESS RARE, BRIEF & NONRECURRING
2,335	PUBLIC SERVICES
40,000	PUBLIC FACILITIES, IMPROVEMENTS & INFRASTRUCTURE

**A REPORT FOR THE U.S. DEPARTMENT OF HOUSING &
URBAN DEVELOPMENT**

Community Development Block Grant (CDBG) Program
HOME Investment Partnership (HOME) Program

The Process

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

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

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

Agency Role	Name	Department/Agency
CDBG Administrator	DENTON	Community Development
HOME Administrator	DENTON	Community Development

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

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(I)).

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 Deputy Director of Community Services for the City of Denton currently serves on the board of the Balance of State, CoC Board of directors. The City's Homeless Programs Coordinator serves on the Data workgroup.

This collaboration supported the development of the framework for local housing focused strategies for 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 people experiencing homelessness (PEH) to permanent housing. The HPL is a list of all households experiencing homelessness in Denton County that have completed a CE housing assessment. CE and the HPL are the system and process that quickly identifies, assesses and refers PEH to housing assistance and supportive services that promote housing stability 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, 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, CoC grants are awarded locally to provide housing and supportive services. In Denton, these fund permanent supportive housing projects, support for Coordinated Entry/HMIS, and Rapid Re-housing so individuals and families can transition out of homelessness into permanent housing.

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

Agency/Group/ Organization Type	Agency/Group/ Organization Type	What section of the Plan was addressed by Consultation?	How was the Agency/Group/ Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?
Child Care Partners: Denton Christian Preschool; Denton City County Day School; Fred Moore Day Nursery School	Affordable Child Care Providers	Public Services and Public Facilities Needs	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
Committee on Persons with Disabilities	Special Needs Citizen Committee	Public Services and Public Facilities	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.
Denton Affordable Housing Corporation	CHDO	Affordable Housing Needs	DAHC participates with the DC Behavioral Health Leadership Team, DC Homelessness Leadership Team along with the City and distributed City

Agency/Group/ Organization Type	Agency/Group/ Organization Type	What section of the Plan was addressed by Consultation?	How was the Agency/Group/ Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?
			online survey through DAHC. OUTCOMES: Partners with City and other organizations to create/preserve affordable rental housing.
Denton County MHMR	Mental Health Service Organization	Public Services Needs	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. OUTCOMES: To improve and expand Mental Health resources/services including PSH.
Denton County Public Health - Healthy Communities Coalition	Public Health Department, Coalitions	Public Services Needs	Coalition of multiple local services providers including the City and distributed City online survey through DCPH. OUTCOMES: Identify community needs, address gaps in services, and expand resources. Engage in planning activities to improve, expand, and coordinate Healthy Community resources/services.

Agency/Group/ Organization Type	Agency/Group/ Organization Type	What section of the Plan was addressed by Consultation?	How was the Agency/Group/ Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?
Denton Housing Authority	PHA	Affordable Housing Needs	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.
Denton County Food Insecurity Biweekly	Public Services Assistance Group	Public Services	Coalition of multiple local services providers including the City. City participates in biweekly meetings. OUTCOMES: Collaborate to identify community needs, address gaps in services, and expand resources to decrease food insecurity.
Denton Independent School District	Public Education Entity	Economic and Public Services Needs	Joint City and DISD meetings are hosted. OUTCOMES: Increase intergovernmental collaboration and identify partnerships necessary to address community needs.
Denton County Behavioral Health Leadership Team	Quasi-Governmental Collective Impact Initiative	Homelessness Strategy, Public Services Needs	City works in collaboration with partners to increase intergovernmental collaboration and identify

Agency/Group/ Organization Type	Agency/Group/ Organization Type	What section of the Plan was addressed by Consultation?	How was the Agency/Group/ Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?
			community needs. OUTCOMES: Enhance the behavioral health outcomes of all partners by facilitating a shared vision, shared measurements, mutually reinforcing activities, and continuous communication.
Denton County Homelessness Leadership Team & Workgroups: Data, Denton County Homeless Coalition, Housing, Shelter Planning	Quasi-Governmental Collective Impact Initiative	Homelessness Strategy, Public Services Needs	City in public-private partnership by 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.
Texas Homeless Network	Lead Agency for the Balance of State CoC	Homelessness Strategy, Public Service Needs	Continuous collaboration and consultation regarding homeless needs in the Denton area. OUTCOMES: Making Homelessness Rare, Brief, and Nonrecurring.

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

Name of Plan	Lead Organization	How do the goals of your Strategic Plan overlap with the goals of each plan?
Assessment of Fair Housing https://ntrha.uta.edu/data/	City of Denton (North Texas Regional Housing Assessment)	AFH-AFFH
Denton Plan 2040	City of Denton	Needs Assessment, Market Analysis, AFH-AFFH
Denton Development Code	City of Denton	Needs Assessment, AFH-AFFH
2022 Denton Mobility Plan	City of Denton	Needs Assessment, AFH-AFFH
Parks Master Plan	City of Denton	Needs Assessment
Collective Impact Initiatives	United Way of Denton County	Needs Assessment
ALICE - (Asset Limited, Income Constrained, Employed)	United Way of Denton County	Needs Assessment
CHIP - Community Health Improvement Plan	Denton County Health Department	Needs Assessment
County Health Rankings and Road Map	Denton County Health Department	Needs Assessment
Regional Data and Analysis	North Texas Council of Governments	Needs Assessment, Market Analysis

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, the Denton County Homelessness Leadership Team, and the Denton County Workforce Success Leadership Team. These public-private partnerships with quasi-governmental teams involve direct collaboration with several adjacent units of general local government including 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 collaborates with the North Central Texas Council of Government (NCTCOG) 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

The Consolidated Plan requirements for citizen participation and consultation are set forth in the Code of Federal Regulations Subpart B of 24 CFR Part 91, “Consolidated Submissions for Community Planning and Development Programs.” (Citizen Participation, [24 CFR § 91.105](#) and Consultation, [24 CFR § 91.100](#)). The 2023-2027 Citizen Participation Plan (CPP) is attached (ATTACHMENT 1).

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 processes 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 committees¹ 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 include 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.** City staff hosted two public hearings on October 27, 2022 and January 12, 2023 to solicit citizen input on priority community needs. Staff published all meetings in the local newspaper and through the City’s social media channels.

- **Community Events.** City staff 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=mtnf7NUKtds>
- **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 reach people who rely exclusively on electronic media for news and information. The City collected surveys from October 13, 2022 through December 2, 2022 which generated 113 responses in total. The survey 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).

¹*These boards/coalitions/committees include the following: Denton County Public Health - Healthy Communities Coalition, Denton County Food Insecurity Zoom, 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, Denton County Workforce Success Leadership Team, 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 engagement through outreach efforts.

- A draft of the Consolidated Plan for FY2023-2027 and the Annual Plan for FY2023 was placed on public display for 30 days beginning May 15, 2023.
 - Draft plans were posted electronically on the City’s website.
 - Information on how to request printed copies was noted in the final hearing legal advertisement.

- Comments were solicited through email listserv 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 May 14 (ATTACHMENT 3), and through the City's social media channels.
- A final public hearing was conducted on June 6, 2023, to obtain final comments on the proposed Consolidated Plan for FY 2023-2027 and the proposed use of funds for FY2023 Action Plan.

Citizen Participation Outreach

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/ attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
1	Newspaper Ads	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.	Requested Public Comment by Phone, Email, Online Survey, or Hearing/Meeting.	Included with 2, 3, and 4 below as applicable.	N/A	Ad Run Dates: May 14, 2023 Att. 3
2	Virtual Public Hearing (1)	Same as above.	11 residents attended.	No comments received.	N/A	October 27, 2022
3	In-Person Public Hearing (2)	Same as above.	6 residents attended	Concerns surrounding mixed use development, student housing, and code enforcement.	Comments were not related to CDBG or HOME funding and will not be included.	January 12, 2023
			TBD	TBD	TBD	June 6, 2023

Citizen Participation Outreach

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/ attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
4	Survey - Online	All city residents and organizations.	67 surveys were completed.	See the Executive Summary, ES-05 (#5, p.4) for a summary of the comments. Attachment 3	N/A	Att. #3
5	Community Development Email listserv (3 Times)	Service providers, residents in low/mod areas, Neighborhood Associations and local churches.	Residents were requested to attend hearings, complete surveys and provide comment.	Included with Sort Order 2, 3, and 4 above as applicable.	N/A	Dates Image/PDF Emailed on October 13, 2022, January 5, 2023 and May 12, 2023. Att.3
6	Social Media	All city residents and organizations.	Residents were requested to attend hearings, complete surveys and provide comment.	Included with Sort Order 2, 3, and 4 above as applicable.	N/A	Posting during survey and comment periods on Facebook and Twitter.
7	Denton Television	All city residents	Posted during survey and public comment periods.	Included with Sort Order 2, 3, and 4 above as applicable.	N/A	https://youtu.be/Frp7FjJln3I

Table 4 – Citizen Participation Outreach

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2023–2027 City of Denton Consolidated Plan

FOR HOUSING
& COMMUNITY DEVELOPMENT

NEEDS ASSESSMENT

HOUSEHOLDS	PRIORITY
281	AFFORDABLE HOUSING
2,105	MAKING HOMELESSNESS RARE, BRIEF & NONRECURRING
2,335	PUBLIC SERVICES
40,000	PUBLIC FACILITIES, IMPROVEMENTS & INFRASTRUCTURE

**A REPORT FOR THE U.S. DEPARTMENT OF HOUSING &
URBAN DEVELOPMENT**

Community Development Block Grant (CDBG) Program
HOME Investment Partnership (HOME) Program

Needs Assessment

NA-05 Overview

Needs Assessment Overview

Several tools 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-income (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 the most recent CHAS data from 2013 to 2017 provided by HUD the following was found:

- 17.98% of all households (8,250) are extremely low-income (0-30% AMI)
- 49.27% of all households (22,600) have incomes ranging from 0% to 80% AMI
- Approximately 19.27% of all households are severely cost burdened (paying more than 50% for housing) with renters affected at a significantly higher rate than homeowners. To compare, 7,424 (83.9%) renter households pay over 50% of their income for rent compared to 1,420 (16.1%) 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)

Demographics	Base Year: 2009	Most Recent Year: 2017	% Change
Population	113,383	131,097	16%
Households	36,926	45,874	24%
Median Income	\$47,297.00	\$52,164	10%

Table 1 - Housing Needs Assessment Demographics

Data Source: 2005-2009 ACS (Base Year), 2013-2017 ACS (Most Recent Year)

Number of Households Table

	0-30% HAMFI	>30-50% HAMFI	>50-80% HAMFI	>80-100% HAMFI	>100% HAMFI
Total Households	8,250	6,280	8,070	4,440	18,830
Small Family Households	1,800	2,085	2,620	1,680	9,775
Large Family Households	465	380	630	605	1,560
Household contains at least one-person 62-74 years of age	725	855	1,574	715	4,089
Household contains at least one-person age 75 or older	550	520	749	385	1,275
Households with one or more children 6 years old or younger	1050	969	1,300	760	2,494

Table 2 - Total Households Table

Data Source: 2013-2017 CHAS

Housing Needs Summary Tables

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

NUMBER OF HOUSEHOLDS

	Renter					Owner				
	0-30% AMI	>30- 50% AMI	>50- 80% AMI	>80- 100% AMI	Total	0-30% AMI	>30- 50% AMI	>50- 80% AMI	>80- 100% AMI	Total

Substandard Housing - Lacking complete plumbing or kitchen facilities

	135	100	85	10	330	10	15	15	0	40
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Severely Overcrowded - With >1.51 people per room (and complete kitchen and plumbing)

	90	15	95	65	265	30	15	0	15	60
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Overcrowded - With 1.01-1.5 people per room (and none of the above problems)

	175	140	240	55	610	50	40	35	25	150
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	Renter					Owner				
	0-30% AMI	>30- 50% AMI	>50- 80% AMI	>80- 100% AMI	Total	0-30% AMI	>30- 50% AMI	>50- 80% AMI	>80- 100% AMI	Total

Housing cost burden greater than 50% of income (and none of the above problems)

	5,375	1,569	200	10	7,154	675	460	245	40	1,420
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Housing cost burden greater than 30% of income (and none of the above problems)

	245	2,330	2,200	370	5,145	330	485	860	400	2,075
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Zero/negative Income (and none of the above problems)

	750	0	0	0	750	95	0	0	0	95
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Table 3 – Housing Problems Table

Data Source: 2013-2017 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

	Renter					Owner				
	0-30% AMI	>30- 50% AMI	>50- 80% AMI	>80- 100% AMI	Total	0- 30% AMI	>30- 50% AMI	>50- 80% AMI	>80- 100% AMI	Total

Having 1 or more of four housing problems

	5,775	1,829	625	135	8,364	760	535	295	80	1,670
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Having none of four housing problems

	450	2,874	4,480	2,270	10,074	410	1,045	2,680	1,960	6,095
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Household has negative income, but none of the other housing problems

	750	0	0	0	750	95	0	0	0	95
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Table 4 – Housing Problems 2

Data Source: 2013-2017 CHAS

3. Cost Burden > 30%

NUMBER OF HOUSEHOLDS

	Renter				Owner			
	0-30% AMI	>30-50% AMI	>50-80% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	Total
Small Related	1,170	1,299	870	3,339	405	320	410	1,135

	Renter				Owner			
	0-30% AMI	>30-50% AMI	>50-80% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	Total
Large Related	260	140	130	530	135	130	15	280
Elderly	605	430	395	1,430	455	455	480	1,390
Other	3,820	2,195	1,070	7,085	105	85	200	390
Total (income)	5,855	4,064	2,465	12,384	1,100	990	1,105	3,195

Table 5 – Cost Burden > 30%

Data Source: 2013-2017 CHAS

4. Cost Burden > 50%

NUMBER OF HOUSEHOLDS

	Renter				Owner			
	0-30% AMI	>30-50% AMI	>50-80% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	Total
Small Related	1,050	489	40	1,579	315	145	45	505
Large Related	235	35	10	280	45	35	0	80
Elderly	565	195	85	845	245	260	190	695
Other	3,705	930	85	4,720	85	40	15	140
Total (income)	5,555	1,649	220	7,424	690	480	250	1,420

Table 6 – Cost Burden > 50%

Data Source: 2013-2017 CHAS

5. Crowding (More than one person per room)

NUMBER OF HOUSEHOLDS

	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
Single family households	100	144	260	70	574	80	0	0	15	95
Multiple, unrelated family households	120	0	64	10	194	0	55	35	25	115
Other, non-family households	45	10	4	40	99	0	0	0	0	0
Total need by income	265	154	328	120	867	80	55	35	40	210

Table 7 – Crowding Information – 1.5

Data Source: 2013-2017 CHAS

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

Table 12 – Crowding Information – 2/2

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

According to the [American Community Survey 2021 \(DP02\)](#), there are 24,705 single person households. Using all household data, 26.9% of renter and 6.9% of homeowner households are cost burdened and 16.2% of renters and 3.1% of homeowners are severely cost burdened. Therefore, of single person households (Table 9, 10):

- 6,645 single person renters and 1,705 single person homeowners are cost burdened; and
- 4,002 single person renters and 766 single person homeowners are severely cost burdened.

Approximately 13,118 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 estimated number of disabled persons is 15,169 which is approximately 11% of the population ([American Community Survey 2021 \(DP02\)](#)) in Denton. The most common disabilities are “ambulatory difficulties” at 36.3% and “difficulty with independent living” at 30.4%. Ambulatory difficulties are slightly higher among the population of 18-64 years at 49.5 % while the 65 years or older population is at 48.1% ([American Community Survey 2021 \(S1810\)](#)).

[Denton County Friends of the Family](#), a non-profit organization that assists victims of domestic violence, received 3,523 calls on the Crisis Hotline from community members in 2022 and assisted 1,587 new clients across the entire agency in 2022. As of Jan, 2023, there are eight (8) households and twelve (12) individuals experiencing homelessness because of domestic violence ([United Way of Denton County Homelessness Data Dashboard](#)). With a continued trend of population increase in Denton, it is statistically likely 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?

According to CHAS data (Table 8), thousands of households in the City, including 8,361 renters and 1,670 homeowners, have moderate to severe housing problems. This aligns with the overall data that 28,935 or 63.1% of all households have at least one housing problem and 49.27% of households in Denton are low- or moderate-income.

By far, cost burden is the most common housing problem in Denton, affecting 24,423 low- and moderate-income households (Table 9, 10). This effects renter households significantly. Renters make up 81.1% 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 extremely low-income households (households earning between 0% and 30% AMI) because over 75.1% 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 81.1% of all cost burdened and severely cost burdened households. The data indicates 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, housing expenses that exceed 30% or 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. Households may also face a variety of other complex issues: family conflicts, domestic violence, overcrowded housing, family members with disabilities, criminal records, behavioral health issues, and prior experience with homelessness resulting in an increased risk of homelessness.

Tenant Based Rental Assistance (TBRA) programs are a permanent housing solution offered in Denton and throughout Denton County. They provide 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 TBRA have experienced homelessness, they have a higher risk of returning to homelessness. As a result, high performing TBRA programs 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 Tables 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 homeowners 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 30% or 50% of their income leads to housing instability and an increased risk of homelessness.

Discussion

A lack of safe, stable, and affordable housing is the most pressing housing issue in most communities, including Denton. The housing assessment overall shows that cost burdened households paying more than 30% or 50% of income on housing is the most common of the four housing problems, especially for renters (81.1% 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 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 lacks 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 as shown in the data available through HUD's eCon Planning Suite.

0%-30% of Area Median Income

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	7,110	285	845
White	3,885	130	400
Black / African American	940	80	74
Asian	460	15	255
American Indian, Alaska Native	30	0	0
Pacific Islander	0	0	0
Hispanic	1,570	60	120

Table 8 - Disproportionally Greater Need 0 - 30% AMI

Data Source: 2013-2017 CHAS

*The four housing problems are:

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

30%-50% of Area Median Income

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	5,174	1,104	0
White	2,999	614	0
Black / African American	590	175	0
Asian	215	0	0
American Indian, Alaska Native	40	25	0
Pacific Islander	0	0	0
Hispanic	1,295	280	0

Table 9 - Disproportionally Greater Need 30 - 50% AMI

Data Source: 2013-2017 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%

50%-80% of Area Median Income

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	3,975	4,095	0
White	2,700	2,560	0
Black / African American	405	310	0
Asian	115	105	0
American Indian, Alaska Native	10	0	0
Pacific Islander	20	0	0
Hispanic	605	1,010	0

Table 10 - Disproportionally Greater Need 50 - 80% AMI

Data Source: 2013-2017 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%

80%-100% of Area Median Income

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	985	3,455	0
White	739	2,490	0
Black / African American	50	240	0
Asian	20	29	0
American Indian, Alaska Native	4	20	0
Pacific Islander	0	0	0
Hispanic	165	660	0

Table 11 - Disproportionally Greater Need 80 - 100% AMI

Data Source: 2013-2017 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 between housing problems and household income in Denton.

Table 13:

At 0%-30% of AMI, 86.3% of the jurisdiction as a whole has one or more of the four 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:

- 3,885/8,240 (47.15%) White
- 940/8,240 (11.41%) Black / African American
- 1,570/8,240 (19.05%) Hispanic

Table 14:

At 31%-50% of AMI, 82.4% of the jurisdiction as a whole has one or more of the four 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:

- 2,999/6,278 (47.76%) White
- 1,295/6,278 (20.63%) Hispanic

As income increases, there are lower rates of households experiencing one or more of the four housing problems. The rate drops from 86.3% for 0%-30% of AMI to 82.4% for 31%-50% of AMI.

Table 15:

At 51%-80% of AMI, 49.3% of the jurisdiction as a whole has one or more of the four 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:

- 2,700/8,070 (33.46%) White

Once again as income increases, there are lower rates of households experiencing one or more of the four housing problems. The rate drops nearly in half from 82.4% for 31%-50% of AMI to 49.3% for 51%-80% of AMI.

Table 16:

At 81%-100% of AMI, 22.2% of the jurisdiction as a whole has one or more of the four 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:

- 739/4,440 (16.64%) White

Consistently, as income increases there are lower rates of households experiencing one or more of the four housing problems. The rate drops more than half from 49.3% for 51%-80% of AMI to 22.2% for 81%-100% of AMI.

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:

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 lacks 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 1.5 persons per room**. (Severely Overcrowded)
4. Household costs: household **pays more than 50 percent of income for housing costs**. (Severely Cost Burdened)

0%-30% of Area Median Income

Severe Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	6,535	860	845
White	3,595	420	400
Black / African American	910	110	74
Asian	415	60	255
American Indian, Alaska Native	30	0	0
Pacific Islander	0	0	0
Hispanic	1,420	205	120

Table 17 – Severe Housing Problems 0 - 30% AMI

Data Source: 2013-2017 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

Severe Housing Problems*	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	2,364	3,919	0
White	1,519	2,089	0
Black / African American	295	470	0
Asian	105	110	0
American Indian, Alaska Native	0	60	0
Pacific Islander	0	0	0
Hispanic	435	1,140	0

Table 12 – Severe Housing Problems 30 - 50% AMI

Data Source: 2013-2017 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

Severe Housing Problems*	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	920	7,160	0
White	570	4,690	0
Black / African American	25	690	0
Asian	30	190	0
American Indian, Alaska Native	10	0	0
Pacific Islander	0	20	0
Hispanic	265	1,345	0

Table 19 – Severe Housing Problems 50 - 80% AMI

Data Source: 2013-2017 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

Severe Housing Problems*	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	215	4,230	0
White	145	3,094	0
Black / African American	0	295	0
Asian	0	50	0
American Indian, Alaska Native	0	24	0
Pacific Islander	0	0	0
Hispanic	70	750	0

Table 13 – Severe Housing Problems 80 - 100% AMI

Data Source: 2013-2017 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 between 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, 79.3% of the jurisdiction as a whole has one or more of the four severe housing problems. Those experiencing a housing problem at a greater rate (10% or more) than the income level as a whole:

- 3,595/8,240 (43.63%) White
- 910/8,240 (11.04%) Black / African American
- 1,420/8,240 (17.23%) Hispanic

Table 18:

At 31%-50% of AMI, 37.6% of the jurisdiction as a whole has one or more of the four severe housing problems. Those experiencing a housing problem at a greater rate (10% or more) than the income level as a whole:

- 1,519/6,283 (24.18%) White

As income increases, there are lower rates of households experiencing one or more of the four severe housing problems. The rate drops more than half from 79.3% for 0%-30% of AMI to 37.6% for 31%-50% of AMI.

Table 19:

At 51%-80% of AMI, 11.4% of the jurisdiction as a whole has one or more of the four 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 disproportionately affected in this income category.

Once again, as income increases there are lower rates of households experiencing one or more of the four severe housing problems. The rate drops more than half from 37.6% for 31%-50% of AMI to 11.4% for 51%-80% of AMI.

Table 20:

At 81%-100% of AMI, 4.8% of the jurisdiction as a whole has one or more of the four 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 disproportionately affected in this income category.

Consistently, as income increases there are lower rates of households experiencing one or more of the four severe housing problems. The rate drops more than half from 11.4% for 51%-80% of AMI to 4.8% for 81%-100% of AMI.

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

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 jurisdiction or income level 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

Housing Cost Burden	Paying less than or equal to (\leq)30% of income on housing	Paying 30-50% of income on housing	Paying greater than ($>$)50% of income on housing	No / negative income (not computed)
Jurisdiction as a whole	27,529	8,450	8,994	905
White	20,020	5,350	5,569	415
Black / African American	1,720	885	1,170	74
Asian	584	275	470	295
American Indian, Alaska Native	104	44	45	0
Pacific Islander	20	20	0	0
Hispanic	4,625	1,670	1,565	120

Table 14 – Greater Need: Housing Cost Burdens AMI

Data Source: 2013-2017 CHAS

Discussion

According to the Housing Cost Burden (Table 21) figures, as self-reported in terms of race and ethnicity with housing costs and income, there are 17,444 households in Denton that are cost burdened with 8,450 paying 30% - 50% of their total household income towards housing expenses and 8,994 severely cost burdened households paying over 50% of their household income on housing expenses. This represents that 18.4% of all households are paying 30% - 50% of their total household income towards housing expenses and 19.6% of all households are paying more than 50% of their total household income towards housing expenses.

Table 21:

- 30% - 50%: 5,350/45,878 (11.7%) 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%: 5,569/45,878 (12.1%) 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 burdened (paying more than 30% or 50% of income on housing) is the most common of the four housing problems. In NA-10 through Tables 9 and 10, the total number of households that are cost burdened is 24,423 (15,579, >30% and 8,840, >50%). That is 53.2% of all households (45,874). Of the 24,423 cost burdened households, approximately 19,808 (81.1%) households are renter households, compared to 4,615 homeowners (18.9%). Cost burdened 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 disproportionately greater need with housing problems at extremely low- and very low-income levels. In at least one category each, White, Black/African American, and Hispanic households experience disproportionately greater needs than the needs of the income category or jurisdiction as a whole especially households with incomes below 50% of AMI.

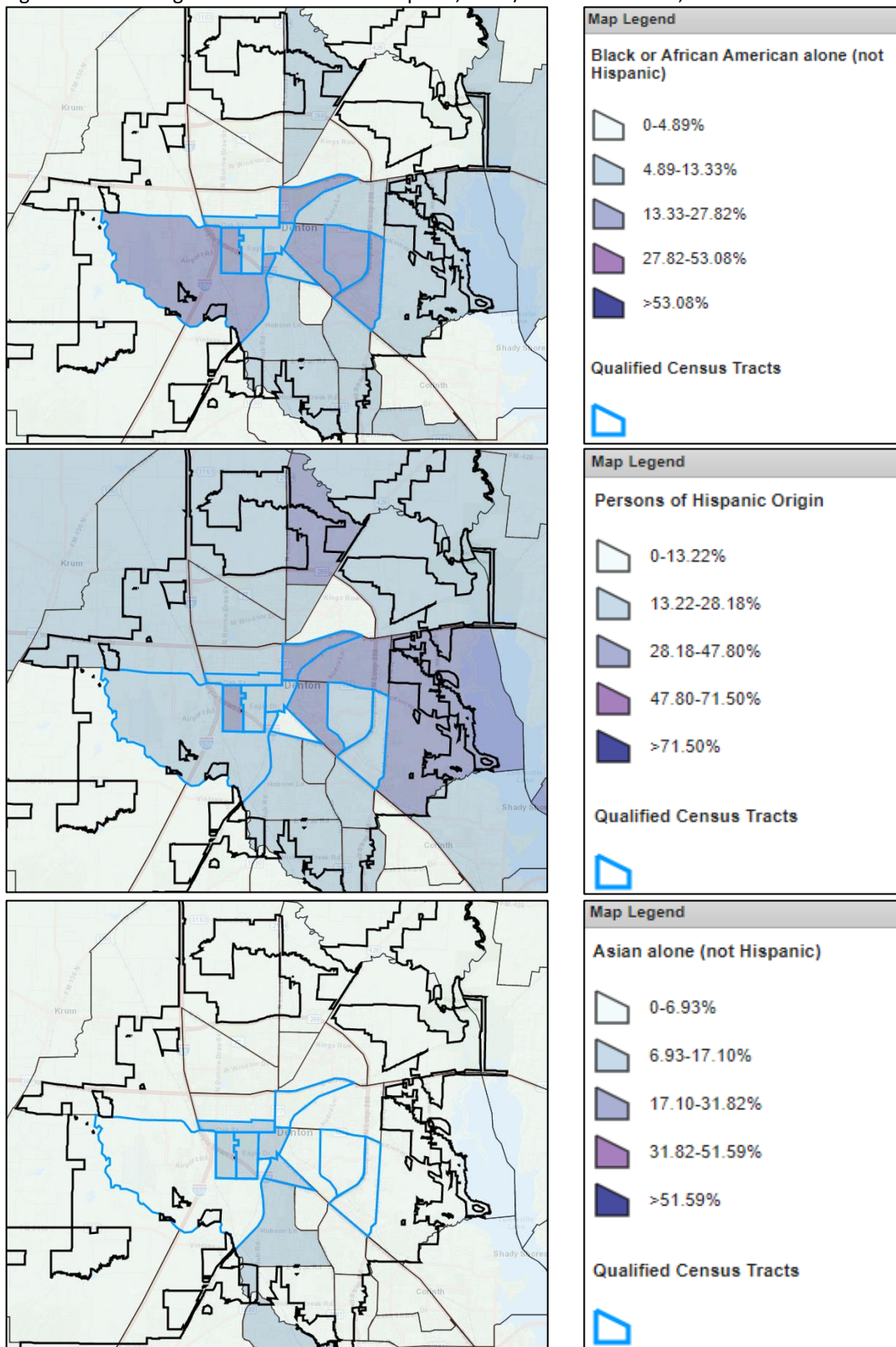
If they have needs not identified above, what are those needs?

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 Hispanic, Black/African American, and Asian households. There is a concentration of Asian communities in the immediate area of the University of North Texas and neighborhoods surrounding the university. Black/African American communities are concentrated in Southeast Denton and in the immediate area of Texas Woman's University. Residents of Hispanic origin are concentrated in half of the neighborhoods in Denton, particularly in neighborhoods in South and East Denton.

Figure 1. Percentage of concentration of Hispanic, Black/African American, and Asian households



Source: HUD CPD Maps, <https://egis.hud.gov/cpdmaps/>

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 1,876 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, as well as Heritage Oaks and the Pecan Place Apartments which provide affordable housing for seniors.

Totals in Use

	Program Type								
	Certificate	Mod-Rehab	Public Housing	Vouchers					
				Total	Project-based	Tenant-based	Special Purpose Voucher		
							Veterans Affairs Supportive Housing!	Family Unification Program	Disabled *
# of units/ vouchers in use	0	0	0	1,589	0	1,589	35	0	186

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

Program Type								
	Certificate	Mod-Rehab	Public Housing	Vouchers				
				Total	Project-based	Tenant-based	Special Purpose Voucher	
							Veterans Affairs Supportive Housing	Family Unification Program
Average Annual Income	0	0	0	17,507	0	17,507	0	0
Average length of stay	0	0	0	6	0	6	0	0
Average Household size	0	0	0	3	0	3	0	0
# Homeless at admission	0	0	0	39	0	39	0	0

	Program Type							
	Certificate	Mod-Rehab	Public Housing	Vouchers				
				Total	Project-based	Tenant-based	Special Purpose Voucher	
							Veterans Affairs Supportive Housing	Family Unification Program
# of Elderly (>62)	0	0	0	478	0	478	0	0
# of Disabled Families	0	0	0	878	0	878	0	0
# of Families requesting accessibility features	0	0	0	0	0	0	0	0
# of HIV/AIDS program participants	0	0	0	0	0	0	0	0
# of DV victims	0	0	0	0	0	0	0	0

Table 24 – Characteristics of Public Housing Residents by Program Type

Data Source: PIC (PIH Information Center)

Race of Residents

Race	Program Type								
	Certificate	Mod-Rehab	Public Housing	Vouchers					
				Total	Project-based	Tenant-based	Special Purpose Voucher		
							Veterans Affairs Supportive Housing	Family Unification Program	Disabled *
White	0	0	0	668	0	668	0	0	0
Black/African American	0	0	0	949	0	949	0	0	0
Asian	0	0	0	20	0	20	0	0	0
American Indian/Alaska Native	0	0	0	10	0	10	0	0	0
Pacific Islander	0	0	0	4	0	4	0	0	0
Other	0	0	0	0	0	0	0	0	0

Table 16 – Race 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

Ethnicity of Residents

Ethnicity	Certificate	Mod-Rehab	Public Housing	Program Type					
				Vouchers					
				Total	Project-based	Tenant-based	Special Purpose Voucher		
							Veterans Affairs Supportive Housing	Family Unification Program	Disabled *
Hispanic	0	0	0	203	0	203	0	0	0
Not Hispanic	0	0	0	1,448	0	1,448	0	0	0

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, 53% of program households are comprised of disabled persons, many of whom have physical or mobility limitations. There is a need for more accessible units that meet ADA requirements. Properties have a limited number of accessible units, which makes it difficult for disabled households on the waitlist to lease units that fit their needs.

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, which are closer to available jobs and high performing schools. HCV holders also experience problems with meeting landlord income requirements, 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%), and DHA reports an increase in recent need in these areas due to the rising costs of goods and services in 2023.

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 waitlist 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 reports that there are over 13,000 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 2023 Point in Time (PIT) Count performed at the County level on January 26, 2023 and through HIMS data reported in the United Way of Denton County's [Homelessness 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.

Figure 2. System Performance Measures Definition

System Performance Measure	Definition
1	Reduce the number of people experiencing homelessness
2	Reduce the length of time households are enrolled in emergency shelter and transitional housing experiencing homelessness
3	Reduce the number of persons who become homeless for the first time
4	Reduce the number of people who return to homelessness after receiving permanent housing
5	Increase access to housing through a variety of successful housing placement options
6	Increase income of homeless adults being served
7	Expand outreach efforts to identify vulnerable populations

We are currently measuring four SPM's with the goal to add measures for the remaining by 2024.

Figure 3. Performance November, 22 – March, 23

System Performance Measure ▾	Nov 22	Dec 22	Jan 23	Feb 23	Mar 23
Returns to homelessness from housing	1	1	3	4	8
Number of households experiencing homelessness	421	394	334	313	352
First time experiencing homelessness	4	3	6	8	12
Average Length of Time Homeless (days)	224	217	214	213	210

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 2023 PIT Count Snapshot



DENTON COUNTY 2023 PIT COUNT SNAPSHOT



SURVEY COVERAGE IN DENTON COUNTY

65 Volunteers



11 Cities/Towns

431 people experiencing homelessness



210
sheltered

15% Increase in Unsheltered
Homelessness from 2022

221
unsheltered



- 67.4% White
- 26.1% African American
- 0.3% Asian
- 1.4% American Indian
- 3.8% Multiple Races
- 1.0% Native Hawaiian or Other Pacific Islander

2.3% Trans or Gender
Nonconforming



- 86.3% Non-Hispanic
- 13.7% Hispanic/Latino
- 9.1% LGBTQIA+



29
VETERANS

27% decrease from 2022



43% of people living
with a behavioral
health disorder are
living unsheltered

48% FEWER
unaccompanied
youth (18-24
yrs) from 2022



55.7 %
Experiencing
homelessness for
the first time

FULL REPORT RELEASED MAY 2023



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 a significant decrease in the number of households with children experiencing homelessness. According to the United Way of Denton County Homelessness [Homeless Data Dashboard](#) as of March 2023, there are fifty-one (51) families and 352 individuals experiencing homelessness in Denton County. Of those, there are thirty (30) veterans experiencing homelessness and zero veteran households. The PIT Count identified twenty-nine (29) Veterans. Denton County service providers continue to work tirelessly to collaborate and implement Coordinated Entry to better identify 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 2024.

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

The 2023 annual PIT count collected information by racial and ethnic groups. Out of 431 individuals surveyed in Denton County, 67.4% were White, 26.1% were Black or African American, 13.7% were Hispanic/Latino, 0.3% were Asian, 3.8% were multiple races, 1.0% were Native Hawaiian or Other Pacific Islander, and 1.4% were American Indian or Alaskan Native.

Describe the Nature and Extent of Unsheltered and Sheltered Homelessness.

Approximately 49% (210) of those counted in annual Point-In-Time Count were sheltered in emergency shelters and other non-permanent sources of housing. Around 51% (221) were counted unsheltered with 55.7% are living with a behavioral health disorder. Between March 2022 to March 2023, 165 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 disabilities and a history of chronic homelessness;
- 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.

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

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, older adults, individuals with disabilities, and persons with chronic issues (physical and/or behavioral health).

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.

Below are the City's key focus area of ***social determinants of health (SDOH)***. ***SDOH are the conditions in the environments where people are born, live, learn, work, play, work, and age that affect a wide range of health, functioning, and quality-of-life outcomes and risks. The following are social determinants of health:***

1. Economic Stability
2. Education Access and Quality
3. Health Care Access and Quality
4. Neighborhood and Built Environment
5. Social and Community Context

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 (IDU)

The NHBS found that of the three high risk populations surveyed in Dallas, IDU 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 2023-2027 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 2023-2027 Consolidated Plan and 2023 Action Plan, Community Development held one public hearing in low- and moderate-income neighborhoods and one virtual public hearing where the City 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 2023-2027 Consolidated Plan which prioritized housing and community development activities. Below are the results of the needs assessment for Public Facilities:

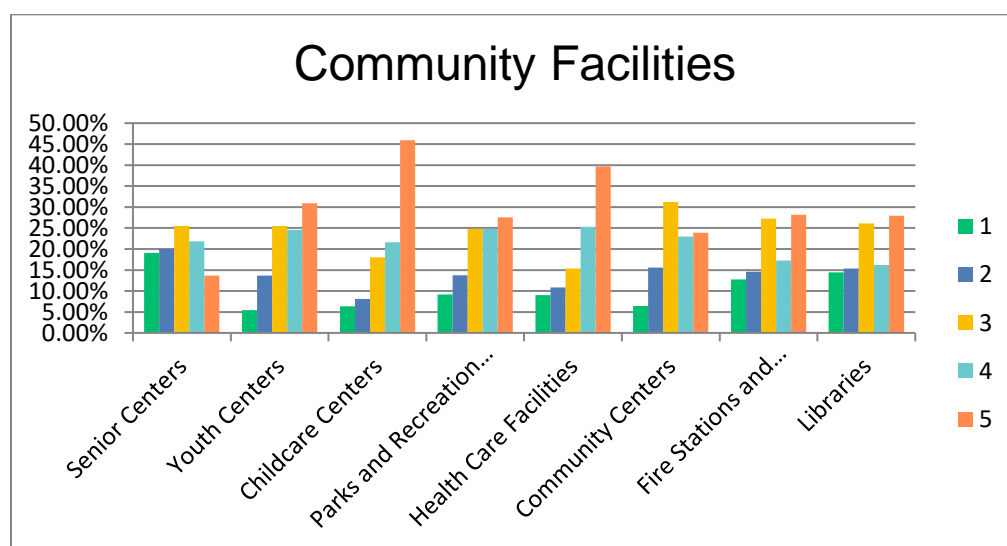


Figure 5: Community Facility Needs

Describe the jurisdiction’s need for Public Improvements.

Citizen comments indicated that streets, sidewalks, and accessibility were the specific public improvements that are needed in the Denton community. Sidewalks and 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:

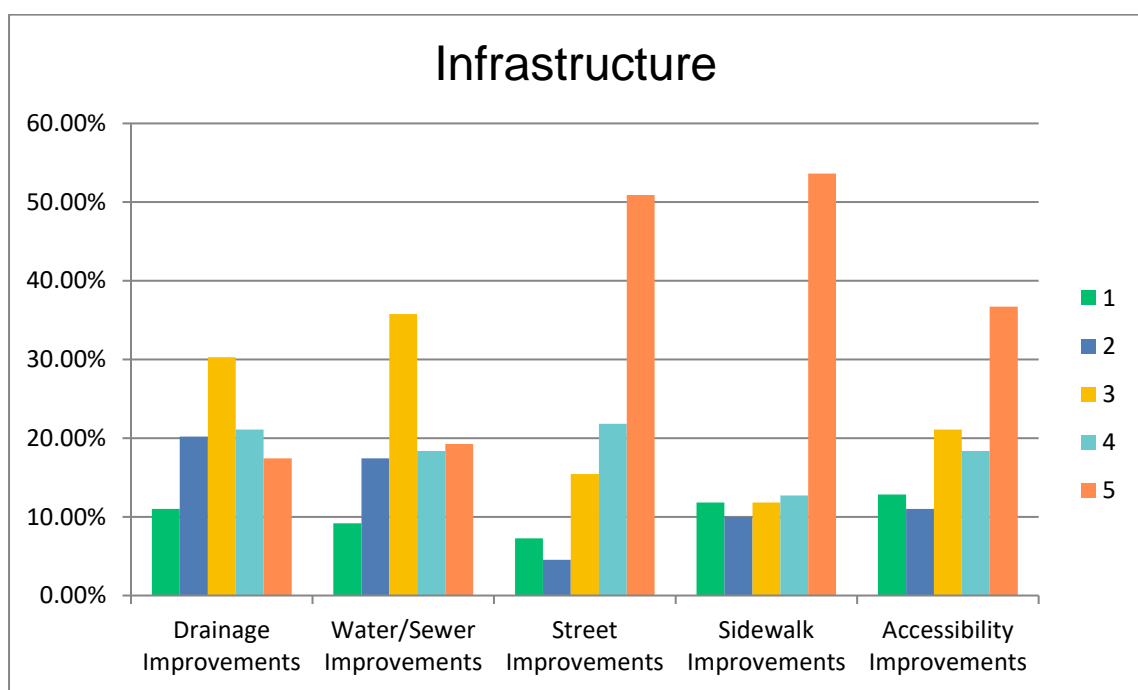


Figure 6: Infrastructure Needs

How were these needs determined?

As part of the development of the 2023-2027 Consolidated Plan and 2023 Action Plan, Community Development held one public hearing in low- and moderate-income neighborhoods and one virtual public hearing where the City 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 2023-2027 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 2023-2027 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:

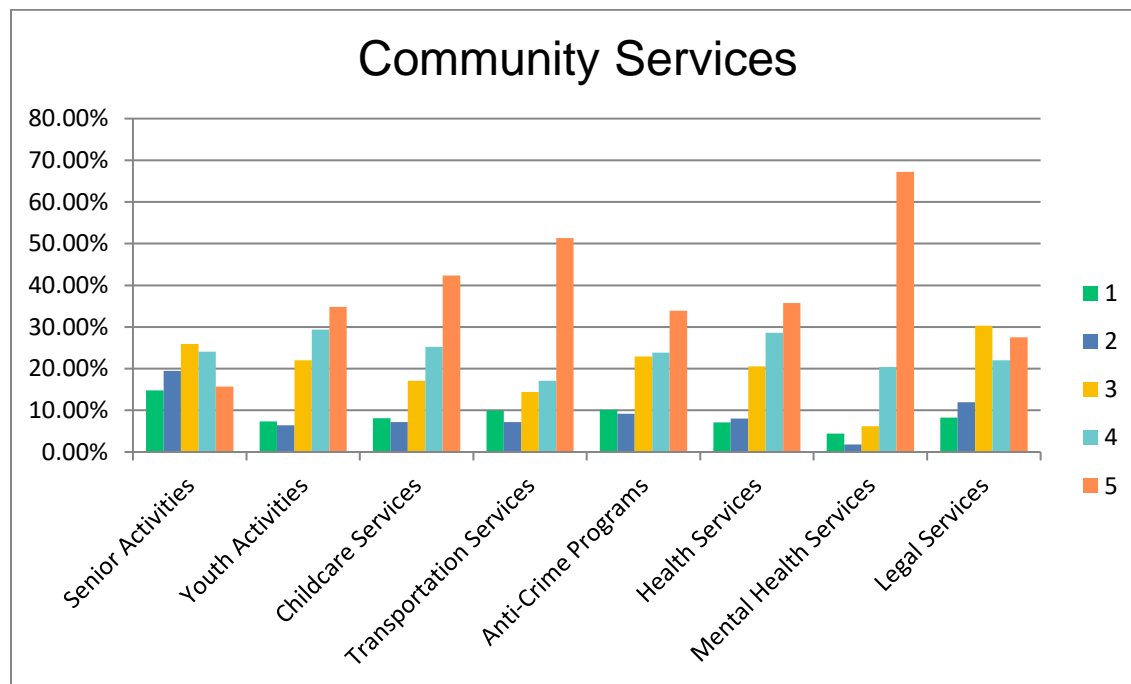


Figure 7: Community Services Needs

How are these needs determined?

As part of the development of the 2023-2027 Consolidated Plan and 2023 Action Plan, Community Development held one public hearing in low- and moderate-income neighborhoods and one virtual public hearing where the City 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 2023-2027 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.

2023–2027 City of Denton Consolidated Plan

FOR HOUSING
& COMMUNITY DEVELOPMENT

MARKET ANALYSIS

HOUSEHOLDS	PRIORITY
281	AFFORDABLE HOUSING
2,105	MAKING HOMELESSNESS RARE, BRIEF & NONRECURRING
2,335	PUBLIC SERVICES
40,000	PUBLIC FACILITIES, IMPROVEMENTS & INFRASTRUCTURE

**A REPORT FOR THE U.S. DEPARTMENT OF HOUSING &
URBAN DEVELOPMENT**

Community Development Block Grant (CDBG) Program
HOME Investment Partnership (HOME) Program

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 2013-2017 CHAS data, there are 49,554 housing units within the City of Denton, made up of approximately 21,914 (44.2%) owner units and 23,959 (48.3%) rental units. Household size and composition affect the demand for different housing types in a community. Additionally, 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, 55% of owner units in the City were built prior to 2000 (Table 38). This could become a concern because many 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 is a need for affordable rental and homeowner units, repair of affordable owner-occupied units, and homelessness prevention. Smaller owner units for seniors are also needed, 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

Property Type	Number	%
1-unit detached structure	27,245	55%
1-unit, attached structure	1,120	2%
2-4 units	4,649	9%
5-19 units	9,550	19%
20 or more units	4,985	10%
Mobile Home, boat, RV, van, etc.	2,005	4%
Total	49,554	100%

Table 31 – Residential Properties by Unit Number

Data Source: 2013-2017 ACS

Unit Size by Tenure

	Owners		Renters	
	Number	%	Number	%
No bedroom	65	0%	1,065	4%
1 bedroom	130	1%	7,340	31%
2 bedrooms	2,375	11%	7,955	33%
3 or more bedrooms	19,344	88%	7,599	32%
Total	21,914	100%	23,959	100%

Table 31 – Unit Size by Tenure

Data Source: 2013-2017 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. As the needs assessment outlines, 24,423 out of 45,874 total households in Denton were identified as cost burdened with 15,579 paying 30% - 50% of their total household income towards housing expenses and 8,844 severely cost burdened households paying over 50% of their household income on housing expenses. (NA, Tables 9 and 10) This represents that 33.9% of all households are paying 30% - 50% of their total household income towards housing expenses and 19.3% of all households are paying more than 50% of their total household income towards housing expenses. Of the cost burdened households, approximately 19,808 (81.1%) households are renter households, compared to 4,615 (18.9%) homeowners. Cost burdened households are the most pressing housing problem, especially at the lower income levels for renters.

Housing services the City will provide include: rental rehabilitation and homeownership assistance. The City targets extremely low-, very low-, and low-income families and individuals whose incomes are at or below 80% AMI as defined by HUD. 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 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-eight (38) Low-Income Housing Tax Credit (HTC) properties in Denton County. Denton has twelve (12) or 32% 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 and Carrollton have more than three HTC properties with six (6) and four (4) respectively.

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 reports that it plans to replace its affordable housing for seniors with new, more modern units.

LOW INCOME HOUSING TAX CREDIT (HTC) UNITS

During the span of this 2023-2027 Con Plan, three LIHTC properties within Denton will reach their 30-year extended compliance period with TDHCA. While property owners may continue to offer affordable units, their contractual obligation with TDHCA will no longer compel them to do so. These three properties contain 300 affordable units between them, with 24 dedicated to the elderly population.

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 13,000 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 low- and moderate-income families are needed along with housing for special populations including seniors, the disabled, and people experiencing homelessness.

Related to special populations, there is a growing need for more one-bedroom affordable units. According to NLIHC data, the working minimum wage is \$7.25/hr. in Texas. In order to afford a two-bedroom unit in Denton, the minimum wage would need to be at least \$23.65/hr, with some zip codes in the city ranging up to at least \$26.92/hr. This prevents residents on fixed incomes well below this wage – such as seniors and disabled persons – from accessing affordable housing.

For the disabled, DHA has indicated that there is a need for larger accessible units. Most developments make one-bedroom accessible units, but not two-, three-, or four-bedroom units 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 burdened households paying more than 30% or 50% of income on housing is the most common of the four housing problems, especially for renters. Of the 24,423 cost burdened households, approximately 19,808 (81.1%) households are renter households, compared to 4,615 homeowners (18.9%). Cost burdened 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 housing costs. 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 13,118 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 2005-2009 ACS and 2013-2017 ACS and CHAS data.

Cost of Housing

	Base Year: 2009	Most Recent Year: 2017	% Change
Median Home Value	141,600	179,000	26%
Median Contract Rent	642	835	30%

Table 23 - Cost of Housing

Data Source: 2005-2009 ACS (Base Year), 2013-2017 ACS (Most Recent Year)

Rent Paid	Number	%
Less than \$500	2,021	8.4%
\$500-999	15,575	65.0%
\$1,000-1,499	4,834	20.2%
\$1,500-1,999	1,015	4.2%
\$2,000 or more	520	2.2%
Total	23,965	100.0%

Table 33 - Rent Paid

Data Source: 2013-2017 ACS

Housing Affordability

% Units affordable to Households earning:	Renter	Owner
30% HAMFI	1,260	No Data
50% HAMFI	5,390	3,295
80% HAMFI	14,030	9,295
100% HAMFI	No Data	6,125
Total	20,680	18,715

Table 34 - Housing Affordability

Data Source: 2013-2017 CHAS

Monthly Rent

Monthly Rent (\$)	Efficiency (no bedroom)	1 Bedroom	2 Bedroom	3 Bedroom	4 Bedroom
Fair Market Rent	1,076	1,150	1,362	1,736	2,280
High HOME Rent	1,076	1,150	1,362	1,612	1,779
Low HOME Rent	852	913	1,096	1,266	1,412

Table 35 – Monthly Rent

Data Source: 2022 HUD FMR and HOME Rents

Is there sufficient housing for households at all income levels?

Figure 8: NA-10, Table 6

	0-30% HAMFI	>30-50% HAMFI	>50-80% HAMFI	>80-100% HAMFI	>100% HAMFI
Total Households	8,250	6,280	8,070	4,440	18,830

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 50% AMI. For the 14,530 households identified in NA-10 (NA, Table 6) who are earning between 0% and 50% AMI, there are only 6,650 affordable rental units and 3,295 affordable owner units (Table 35).

A surface-level analysis of the 50% AMI and higher income ranges initially appears to show adequate availability. However, a deeper dive into the cumulative data and a critical analysis of overall housing issues within the city shows the opposite. There are 5,054 very low-income (31-50% AMI) households and 3,570 low-income (51-80% AMI) households who are cost burdened, as well as 2,129 very low-income (31-50% AMI) households and 470 low-income (51-80% AMI) households who are severely cost burdened, despite current unit inventory. 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 four or more bedrooms. Therefore, even with the availability of affordable units, many households are placed in overcrowded or otherwise inadequate conditions.

Figure 9: NA-10, Table 9

	Renter				Owner			
	0-30% AMI	>30-50% AMI	>50-80% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	Total
Total (income)	5,855	4,064	2,465	12,384	1,100	990	1,105	3,195

Table 9 – Cost Burden > 30%

Figure 10: NA-10, Table 10

	Renter				Owner			
	0-30% AMI	>30-50% AMI	>50-80% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	Total
Total (income)	5,555	1,649	220	7,424	690	480	250	1,420

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 26% from 2009 to 2017 and contract rent increased by 30% (Table 33). While this data reflects HUD standard ACS data, it is especially pertinent to consider additional current data alongside this analysis, particularly after the housing market disruption around the COVID-19 Global Health Crisis. Per the [U.S. Census Bureau QuickFacts: Denton, Texas](#), the median value of owner-occupied housing units for 2017-2021 was \$257,500, which is an additional increase of 43.8% from 2017 and a total increase of 81.5% from 2009. The median gross rent for 2017-2021 was \$1,164, an additional increase of 39.4% from 2017 and a total increase of 81.3% from 2009. These amounts are a significant increase from 2017 CHAS numbers. Also, according to data from the [Real Estate Center at Texas A&M University](#), the median home sales price in Denton in 2022 was \$460,000. The [2021 American Community Survey \(ACS\) 1-Year Estimate](#) shows median rent was \$1,112. Given the projected increase in population, as well as the continued effects of COVID-19 on housing and other social determinates of health, the increase in home values and rents is likely to continue and further reduce the proportional number of available affordable housing units.

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

The [2021 American Community Survey \(ACS\) 1-Year Estimate](#) shows median rent was \$1,112. During the same time frame the 2021 Fair Market Rent (FMR) was \$1,352. 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 21,915 owner-occupied housing units and 23,959 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

Condition of Units	Owner-Occupied		Renter-Occupied	
	Number	%	Number	%
With one selected Condition	4,575	21%	13,294	55%
With two selected Conditions	145	1%	490	2%
With three selected Conditions	0	0%	35	0%
With four selected Conditions	0	0%	0	0%
No selected Conditions	17,195	78%	10,140	42%
Total	21,915	100%	23,959	99%

Table 36 - Condition of Units

Data Source: 2013-2017 ACS

Year Unit Built

Year Unit Built	Owner-Occupied		Renter-Occupied	
	Number	%	Number	%
2000 or later	9,835	45%	6,940	29%
1980-1999	6,335	29%	8,539	36%
1950-1979	4,470	22%	7,613	32%
Before 1950	999	5%	865	4%
Total	21,909	101%	23,957	101%

Table 37 – Year Unit Built

Data Source: 2013-2017 CHAS

Risk of Lead-Based Paint Hazard

Risk of Lead-Based Paint Hazard	Owner-Occupied		Renter-Occupied	
	Number	%	Number	%
Total Number of Units Built Before 1980	5,739	26%	8,478	35%
Housing Units Built Before 1980 with Children Present	4,850	22%	2,530	11%

Table 38 – Risk of Lead-Based Paint

Data Source: 2013-2017 ACS (Total Units) 2013-2017 CHAS (Units with Children present)

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

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

Table 9 - Vacant Units

Need for Owner and Rental Rehabilitation

The inventory of housing newer than 1980 in Denton is 74% owner-occupied and 65% renter-occupied. However, where aging housing stock exists, it is more likely to require repair, maintenance, or upgrades. Twenty-two percent (22%) of owner-occupied units and 58% 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 rental units owned by the City's CHDO, Denton Affordable Housing Corporation, and a new rental rehabilitation program funded with CDBG and General Funds. Significantly, 56% of the owner units in the City were built prior to 2000. Many 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 in poor condition and occupied by extremely low- (0-30% AMI) and very low-income (31-50% AMI) households. Using the data available, it is possible that 22% of households, including those with children present, may lack the financial means to correct a lead hazard.

Discussion

Addressing unsafe and unhealthy conditions in 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. The City has increased the amount of funds available for the minor repair program to aid units with problems that require immediate attention. The City has started a rental rehabilitation program to help increase affordable housing.

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 1,876 Housing Choice Vouchers (also referred to as Section 8 or HCV) and a Homeownership Program. There are over 13,000 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

	Certificate	Mod-Rehab	Public Housing	Program Type					
				Vouchers					
				Total	Project-based	Tenant-based	Special Purpose Voucher		
							Veterans Affairs Supportive Housing	Family Unification Program	Disabled *
# of units vouchers available				1,589	0	1,589	35	0	186
# of accessible units									

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

Public Housing Development	Average Inspection Score
N/A	N/A

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 unhoused persons within the City of Denton, particularly individuals and families that experience chronic homelessness, families with children, veterans and their families, and unaccompanied youth. The table below utilizes the 2023 Housing Inventory Count (HIC) and other housing program inventory.

Facilities and Housing Targeted to Homeless Households

	Emergency Shelter Beds		Transitional Housing Beds	Permanent Supportive Housing Beds	
	Year Round Beds (Current & New)	Voucher / Seasonal / Overflow Beds	Current & New	Current & New	Under Development
Households with Adult(s) and Child(ren)	HIC: ▪ 23 DCFOF ▪ 6 TSA ▪ 4 ODB = 33		HIC: ▪ 18 CUMB	HIC: ▪ 10 MHMR ▪ 3 GG OTHER: ▪ 19 DHA EHV ▪ 9 DHA HUD VASH =41	
Households with Only Adults	HIC: ▪ 16 DCFOF ▪ 113 ODB ▪ 40 TSA =169		HIC: ▪ 23 ODB	HIC: ▪ 29 GG ▪ 32 MHMR OTHER: ▪ 21 DHA EHV ▪ 31 DHA HUD VASH = 113	
Chronically Homeless Households				HIC: ▪ 42 MHMR ▪ 32 GHI ▪ 40 DHA EHV = 114	
Veterans				HIC: ▪ 40 DHA HUD VASH	
Unaccompanied Youth			*		

Table 12 - Facilities and Housing Targeted to Homeless Households

CUMB: Cumberland Children's Presbyterian Home
DCFOF: Denton County Friends of the Family
DHA: Housing Authority of Denton
MHMR: Denton County MHMR

GG: Giving Grace
ODB: Our Daily Bread, Inc.
TSA: The Salvation Army, Denton

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 involve 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 and Transitional Shelters.** Emergency shelter 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 and two transitional shelter 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. The transitional shelters provide temporary housing for individuals and families that is accessible 24 hours a day and targeted case management.
- **Tenant Based Rental Assistance (TBRA) and Supportive Services.** TBRA services provide short- and/or medium-term rental assistance necessary to support an individual or family in obtaining and maintaining permanent housing. Qualifying populations include literal homelessness, at risk of homelessness, fleeing domestic violence, and veteran with a preference to serve households experiencing literal homelessness. Supportive services provide TBRA assisted households with case management and a broad range of supportive services to maintain permanent housing.
- **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.

- **Permanent Supportive Housing Programs.** 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 maintain housing. These programs target people who have experienced chronic homelessness and have a disability.

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 Grace:** Housing, childcare, transportation case management. CoC Grant provides 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. Street Outreach, funded by City General funds, provides outreach and referrals to resources to individuals and families living in unsheltered locations. Transitional shelter, funded by City General Funds and American Rescue Plan funds, provides temporary housing that is accessible 24 hours a day and targeted case management at a local hotel.
- **Our Daily Bread:** 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. 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. Transitional shelter, funded by City General Funds and American Rescue Plan funds, provides temporary housing that is accessible 24 hours a day and targeted case management at the Denton Community Shelter and a local hotel.
- **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:

- Fair Oaks of Denton
- Denton Affordable Housing Corp who has ninety-one (91) 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. 91.315(e)

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, Livable, 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 promote economic stability.
3. Public Services, Facility, and/or Infrastructure Grants to increase availability, access, and quality of Health Care.
4. Public Services, Facility, and/or Infrastructure Grants to improve Family Stability by improving education access and quality.
5. Public Services, Facility, and/or Infrastructure Grants to increase availability and access to services that provide social and community context 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 by investing in the neighborhoods and built environments of Denton.
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 and stability.

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))

Not applicable. 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. Refer to the Housing Needs Assessment portion of the Consolidated Plan for further details on these factors. 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.

For more information on the specific actions the City of Denton is taking to alleviate these barriers, refer to MA-50.

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

Introduction

According to the Denton Plan 2040, 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 and the addition of a North Central Texas College (NCTC) campus in Downtown Denton, students are a significant asset for the City. The universities and NCTC college serve as economic building blocks from which research partnerships can emerge, employers can staff jobs and entrepreneurial start-ups can launch. According to the Business Activity data from the U.S. Census Bureau, twenty percent (20%) of the jobs located in Denton are in Education and Health Care Services. As the universities evolve their educational programs to prepare new graduates to fill well-paying jobs offered by growing industries, the City can continue to strengthen its position as an education hub. Overall, Denton benefits from having a diverse industry base. Economic diversity creates a stable base, able to weather the ups and downs of any specific industry sector with less interruption to the city's economy.

In addition to the above industry analysis, the City of Denton and its economic development partners are focused on supporting inclusive economic recovery efforts resulting from the COVID-19 pandemic. The COVID-19 pandemic has had a disproportionate impact on low-income residents and people of color. Compared to other DFW cities, Denton has a larger proportion of its community (primarily in the southern and eastern parts of the City) that is more vulnerable to both the health and economic fallout from COVID-19. Therefore, equitable and inclusive economic recovery strategies are central in Denton's efforts to stabilize its economy and recover from the pandemic.

Economic Development Market Analysis:

Business Activity

Business by Sector	Number of Workers	Number of Jobs	Share of Workers %	Share of Jobs %	Jobs less workers %
Agriculture, Mining, Oil & Gas Extraction	810	41	1.1	0	-1
Arts, Entertainment, Accommodations	9,663	5,269	12.9	16	1
Construction	3,540	2,105	4.7	5	0.9
Education and Health Care Services	21,801	7,892	29.1	20	-8.3
Finance, Insurance, and Real Estate	4,527	2,021	6	4	-0.7
Information	1,129	275	1.5	1	-0.8
Manufacturing	6,114	7,704	8.2	17	12.1
Other Services	3,437	1,299	4.6	3	-1.2

Business by Sector	Number of Workers	Number of Jobs	Share of Workers %	Share of Jobs %	Jobs less workers %
Professional, Scientific, Management Services	7,038	1,976	9.4	6	-4.2
Public Administration	2,674	0	3.7	0	-3.7
Retail Trade	8,077	6,345	10.8	15	5.9
Transportation and Warehousing	4,066	1,611	5.4	4	-1.2
Wholesale Trade	2,039	1,368	2.7	3	0.9
Total	75,005	37,906	--	--	--

Table 13 - Business Activity

Data Source: 2017-2021 ACS (Workers), 2017 Longitudinal Employer-Household Dynamics (Jobs)

Labor Force

Employment/Unemployment	Number of People
Total Population in the Civilian Labor Force	79,105
Civilian Employed Population 16 years and over	75,005
Unemployment Rate	5.1
Unemployment Rate for Ages 16-24	12.8
Unemployment Rate for Ages 25-65	2.9

Table 14 - Labor Force

Data Source: 2017-2021 ACS

Occupations by Sector	Number of People
Management, business, science, arts	31,302
Natural resources, construction, maintenance	4,870
Service	14,475
Sales and office	16,427
Production, transportation, material moving	7,931

Table 15 - Occupations by Sector

Data Source: 2017-2021 ACS

Travel Time

Travel Time	Number	Percentage
< 30 Minutes	43,451	65%
30-59 Minutes	20,054	30%
60 or More Minutes	3,342	5%
Total	66,848	100%

Table 16 - Travel Time

Data Source: 2017-2021 ACS

Education:

Educational Attainment by Employment Status (Population 25 to 64 Years)

Educational Attainment	In Labor Force		Not in Labor Force
	Civilian Employed	Unemployed	
Less than high school graduate	4,381	59	1,564
High school graduate (includes equivalency)	9,826	510	2,892
Some college or Associate degree	17,383	727	3,787
Bachelor's degree or higher	22,832	368	3,608

Table 17 - Educational Attainment by Employment Status

Data Source: 2017-2021 ACS

Educational Attainment by Age

	Age				
	18–24 yrs	25–34 yrs	35–44 yrs	45–65 yrs	65+ yrs
Less than 9th grade	193	456	889	1,389	517
9th to 12th grade, no diploma	757	888	997	1,385	664
High school graduate, GED, or alternative	5,997	5,121	1,942	6,165	3,092
Some college, no degree	17,519	6,414	4,095	6,405	3,524
Associate degree	1,474	1,597	1,225	2,181	927
Bachelor's degree	3,050	7,308	4,343	6,313	3,761
Graduate or professional degree	385	3,168	2,166	3,525	3,163

Table 18 - Educational Attainment by Age

Data Source: 2017-2021 ACS

Educational Attainment – Median Earnings in the Past 12 Months

Educational Attainment	Median Earnings in the Past 12 Months
Less than high school graduate	28,212
High school graduate (includes equivalency)	33,289
Some college or Associate degree	37,796
Bachelor's degree	55,212
Graduate or professional degree	58,585

Table 19 – Median Earnings in the Past 12 Months

Data Source: 2017-2021 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 20.8%
- Manufacturing 20.3%
- Retail Trade 16.7%
- Arts, Entertainment, Accommodations 13.9%
- Construction 5.6%

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 City is considering expanding the Westpark TIRZ or establishing a new TIRZ to include Harris Ranch, a developing ‘Business Innovation’ area in the Northern part of the City,

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 in December 2020 that provides a means to address Denton's key workforce needs. The plan includes economic recovery strategies such as business retention, workforce development, and community services.

- Denton ISD's Career and Technology and Education Advisory Committee industry partners provide curriculum expertise and internship opportunities to students enrolled in the district's 31 career skills and certification training programs covering sixteen (16) 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.
- The Denton County Workforce Success Leadership Team (WSLT) promotes a holistic community approach to the workforce that ensures an equitable playing field and provides every individual and family with opportunities to increase their earning potential, succeed, and thrive. The City of Denton participates in the WSLT to develop and implement supports for unemployed and underemployed residents, including those who have been displaced from jobs and might require upskilling or retraining in order to access new employment opportunities.

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.

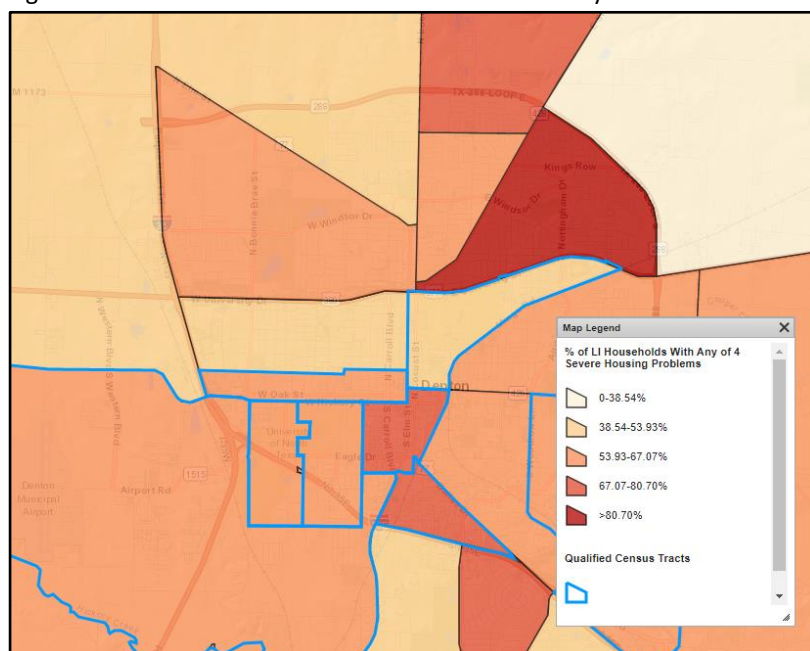
The City of Denton is aligned with the Consolidated Plan through our strategic efforts to develop a competitive workforce, including focusing on training programs that can best prepare students entering the workforce and assisting employers develop or fund on-the-job technical training programs. The City is also developing a more robust entrepreneurship support program to assist new and small businesses. Additionally, the City provides resources for disadvantaged, minority and women-owned 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 concentrations of multiple housing problems is defined as a census tract where the number of households with any of the 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, very low-income, low-income, and moderate-income family categories.

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



Source: HUD CPD Maps, <https://egis.hud.gov/cpdmaps/>

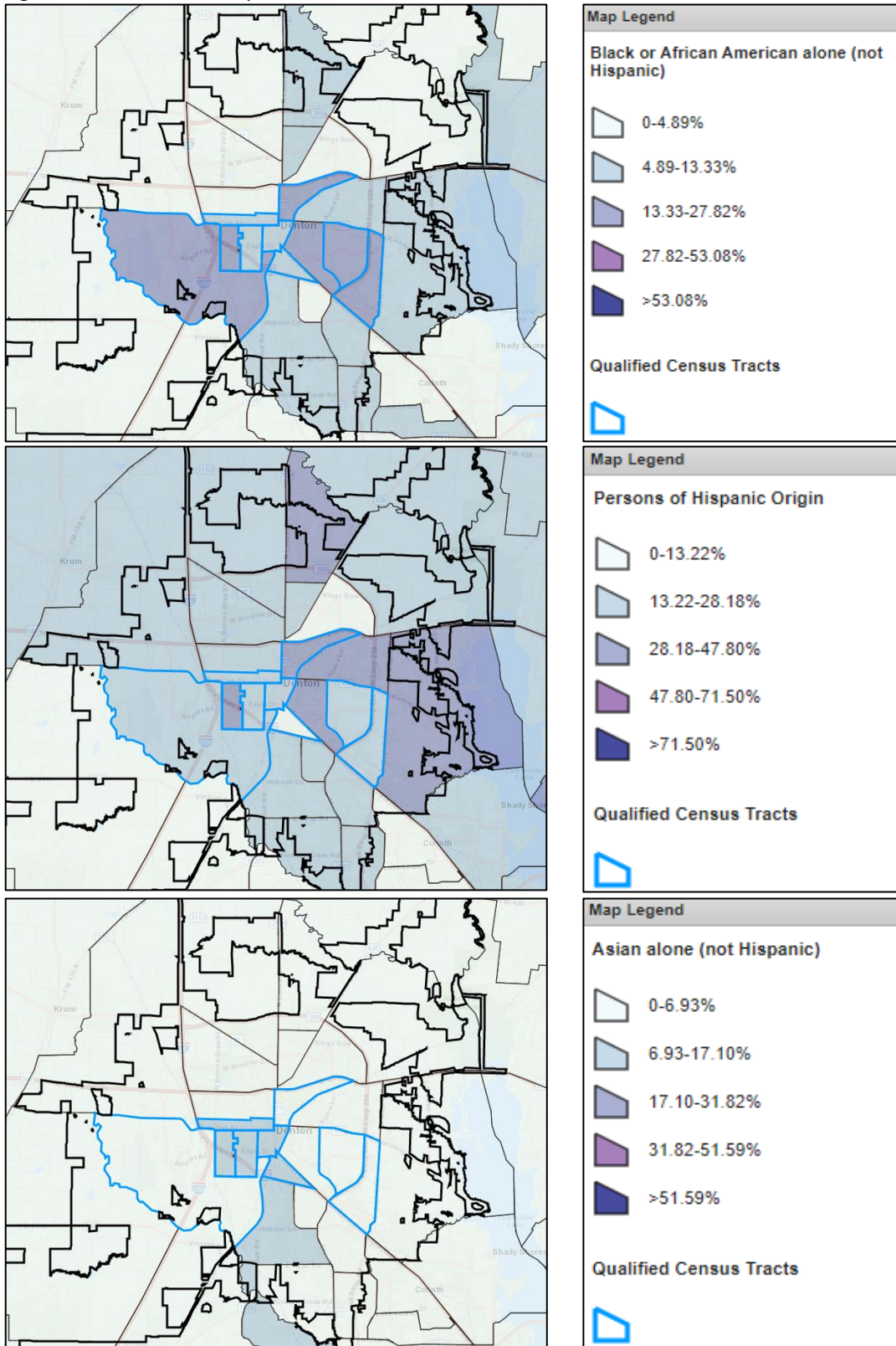
A newer southeastern, northwestern portion, and an existing affluent southern portion, of the City are shown to have no concentration of housing problems. As discussed previously in the Needs Assessment, the main cause of severe housing problems for Denton is the high cost burden on households.

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 a concentration of 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 southwest to rural 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 following maps show areas with concentrations.

Figure 12: Concentration by racial or ethnic minorities



Source: HUD CPD Maps, <https://egis.hud.gov/cpdmaps/>

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?

In 2021, the City completed the Affordable Housing Needs and Market Value Analysis with the goal to gather and analyze demographic and market data to further Community Service's 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 began work to implement [Denton's Affordable Housing Toolkit](#) (Toolkit), which includes 18 activities divided into 5 strategies to deliver innovative housing interventions related to acquisition, preservation, and construction of affordable housing units. The City's goal is to incentivize the creation of 4,300 affordable units in the next 10 years by targeting policy, funding, programs, and advocacy related to the 5 strategies:

- **Infill Development:** Infill development refers to the construction of new buildings on vacant or underutilized land in developed areas of the City. The Toolkit targets accessory dwelling units and small home community programs to this end.
- **Zoning Relief and Variances:** Zoning relief and variances combines adjustments to regulations with targeted incentives to enable the private sector to produce lower priced units through zoning overlays and development community input.
- **Increase Capacity and Resources:** The goal of increasing capacity and resources is to provide incentives, grant assistance, and technical assistance to the existing affordable housing development community and city partners to increase the output of new low-

cost units. The activities aimed to further this goal include a non-capacity building grant, a developer incentive package, a pre-development financing program, and a low-income homeownership program.

- **Preservation:** Preservation activities include a housing trust incentive program, an employee homeownership program, land banking, a rental repair grant, and a down payment assistance program. Two of the five proposed activities have been partially or fully implemented in the City's Homeowner Repair Assistance program and Home Buyer Assistance program.
- **Increase Access to Information:** By increasing access to information for renters and landlords, the City endeavors to promote the existence and expansion of affordable housing and development. Goals under this strategy include an eviction prevention education campaign, an interactive mapping tool, and a DHA education campaign for voucher usage.

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

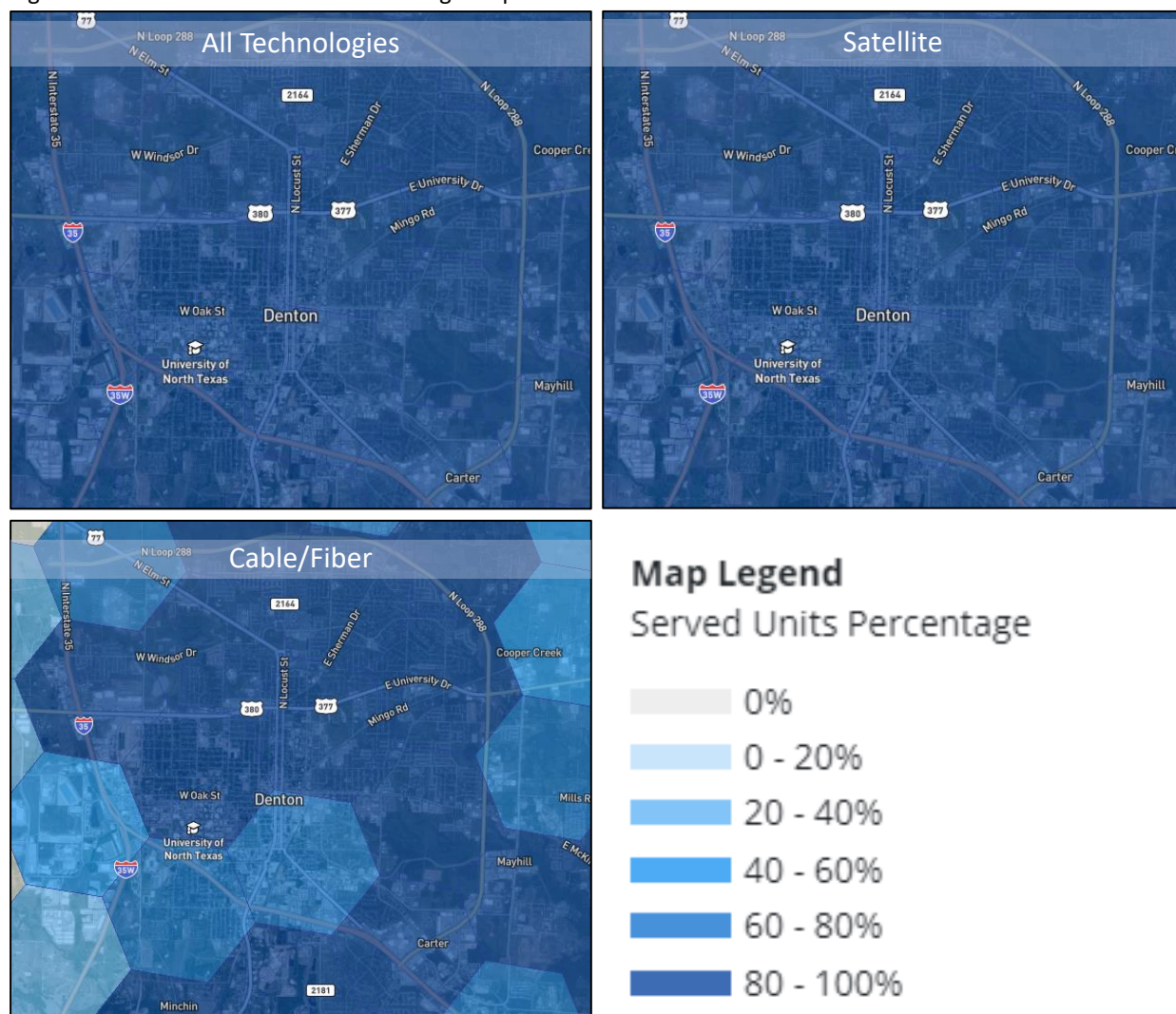
Describe the need for broadband wiring and connections for households, including low- and moderate-income households and neighborhoods.

The [2021 US Census American Community Survey \(DP02\)](#) reports that 89.9% of households have a broadband Internet subscription. According to the Federal Communication Commission's (FCC) broadband maps, the City of Denton is 100% covered by high-speed internet, defined as at least 25 megabits per second (mbps) download speeds and 3 mbps upload speeds. This coverage is spread across technologies that include cable, fiber, DSL, satellite, fixed wireless, and mobile broadband with a concentration in cable/fiber and satellite.

In 2020, the City assessed the current infrastructure and identified areas without high-speed internet access in the Preserve at Pecan Creek and surrounding blocks. As of 2023, at least one high-speed internet connection provider has expanded to cover these areas of need. The City has not identified any further areas without high-speed internet access beyond the development-typical delay when constructing a new single-family neighborhood.

While generally the cost of cable and fiber connections is considered affordable, the 24,423 (53.2%) households that are cost burdened or severely cost burdened may struggle to afford this utility cost. In addition to the FCC's [Affordable Connectivity Program](#), which provides a significant monthly internet bill discount to low-income households, the City provides free public access to high-speed internet, computers, and more advanced technology such as 3D printers, via the City's libraries, senior center, and select indoor recreation centers.

Figure 13: FCC broadband internet coverage maps



Source: FCC Broadband Map, <https://broadbandmap.fcc.gov>

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. Viasat, Inc and Hughes Network Systems, LLC (HughesNet) cover the majority of the City's satellite internet services, with Space Exploration Holdings, LLC (SpaceX) as a potential but unverified additional satellite provider. Nextlink Residential and Speed of Light Broadband also offer fixed wireless services and some areas in south Denton (near Hickory Creek Road) have additional options available including Grande Communications. The table below shows a summary of available options according to the FCC broadband map.

Figure 14: Broadband speeds

Provider	Technology	Download Speeds	Upload Speeds	Notes
Charter Communications	Cable	1000 mbps	35 mbps	
Frontier Communications	Fiber	2000 mbps	2000 mbps	
Grande Communications	Cable	400 mbps	20 mbps	Available in south Denton
HughesNet	Satellite	25 mbps	3 mbps	
Speed of Light Broadband	Fixed Wireless	50 mbps	50 mbps	
ViaSat, Inc.	Satellite	125 mbps	3 mbps	
Nextlink Residential	Fixed Wireless	50 mbps	35 mbps	
Space Exploration Holdings, LLC	Satellite	100 mbps	10 mbps	Unverified availability

While most neighborhoods in the city have access to more than one provider, households without multiple options do not possess the ability or leverage to change providers in the event of raised rates, a dispute with the company, account closure, dissatisfaction with service, or any other reason. This leaves some households, often low-income and rural households, at the mercy of a single provider's policies, prices, and stipulations. Additionally, when more than one provider is available, as evidenced by Figure 14, not all options are equal. Satellite service at 25/3 mbps with ping times in the thousands is not comparable to a fiber service at 2000/2000 mbps with single-digit ping times. This difference can effectively force a household to stay with one provider, particularly if a household is reliant on internet speeds for remote work, remote school, remote healthcare, or other vital service.

Unfortunately, the City does not have authority by state or federal law to control the provision of service; however, staff continues to work on behalf of city residents to diversify broadband opportunities.

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 2040 Comprehensive Plan, p.8-9)

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 considered 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.

2023–2027 City of Denton Consolidated Plan

FOR HOUSING
& COMMUNITY DEVELOPMENT

STRATEGIC PLAN

HOUSEHOLDS	PRIORITY
281	AFFORDABLE HOUSING
2,105	MAKING HOMELESSNESS RARE, BRIEF & NONRECURRING
2,335	PUBLIC SERVICES
40,000	PUBLIC FACILITIES, IMPROVEMENTS & INFRASTRUCTURE

**A REPORT FOR THE U.S. DEPARTMENT OF HOUSING &
URBAN DEVELOPMENT**

Community Development Block Grant (CDBG) Program
HOME Investment Partnership (HOME) Program

Strategic Plan

SP-05 Overview

Strategic Plan Overview

The elements in this section provide context for strategic priorities to be addressed with the City's federal grant funds, Community Development Block Grant (CDBG) and Home Investment Partnerships Program (HOME) grant funds, and other leveraged resources under the 2023-2027 Consolidated Plan for Housing and Community Development.

The Strategic Plan provides an outline of what we want to accomplish with both City general fund dollars and federal grants over the next five years. This Strategic Plan seeks to address social determinants of health among low- and moderate-income residents, and foster *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 2023-2027;
- Address and/or mitigate issues identified in the 2023-2027 Fair Housing Plan;
- Leverage the work of other City adopted plans or eligible initiatives.

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

Geographic Area

1	Area Name:	Denton City Limits
	Area Type:	City-Wide

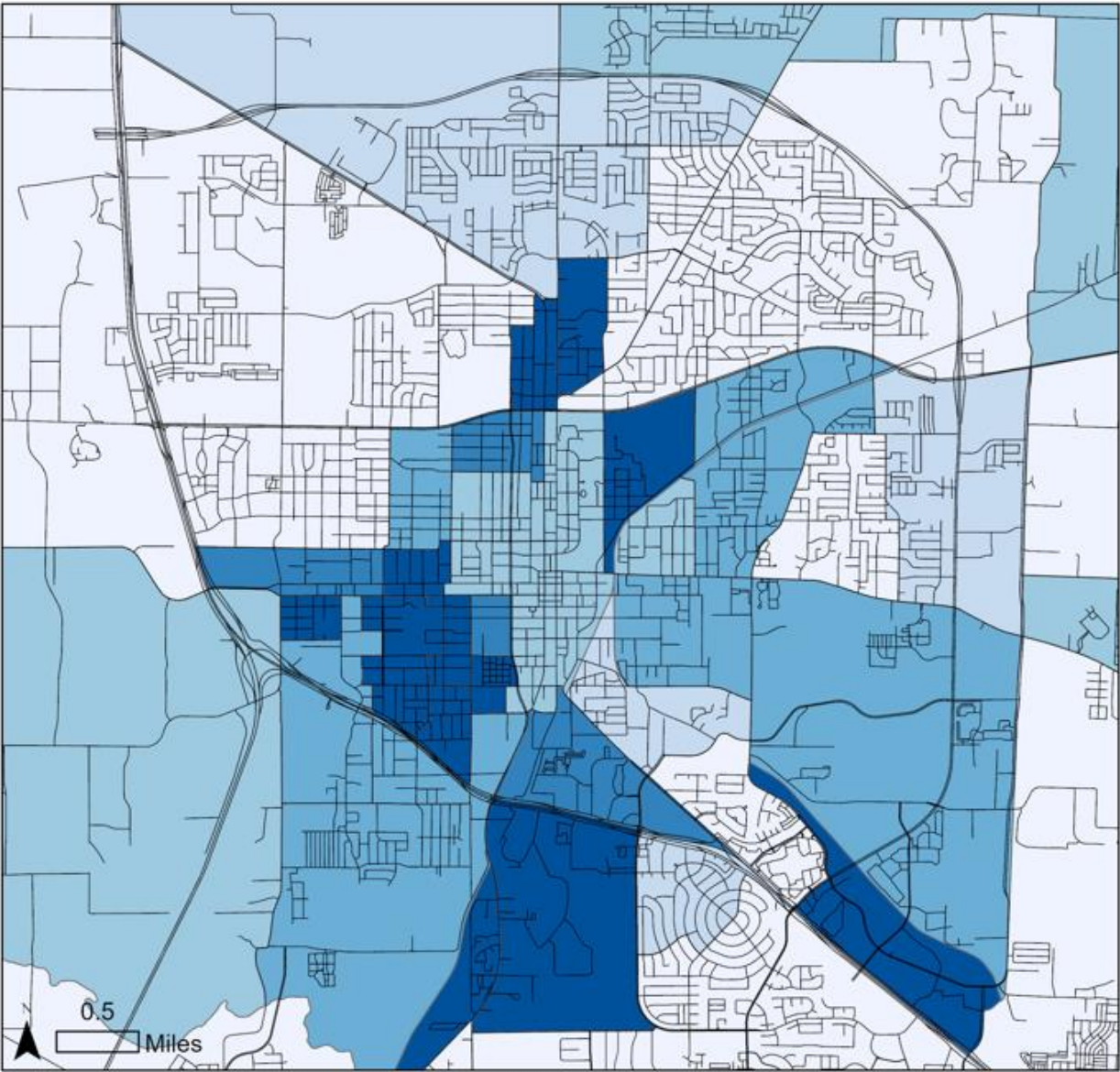
Table 52- Geographic Priority Areas

General Allocation Priorities

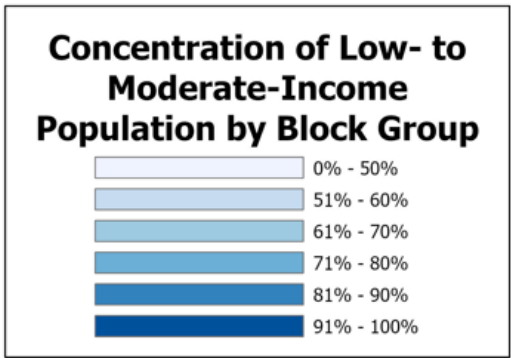
Describe the basis for allocating investments geographically within the jurisdiction (or within the EMSA for HOPWA)

The City of Denton encourages production and preservation of affordable housing throughout the City to maximize choice for low-income households. The City does not currently have any official HUD-designated geographic priority areas. 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 that meet 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



Esri, NASA, NGA, USGS, FEMA, UnivNorthTexas, Texas Parks & Wildlife, Esri, HERE, Garmin, SafeGraph, GeoTechnologies, Inc., METI/NASA, USGS, EPA, NPS, USDA
Spatial Reference: NAD 1983 StatePlane Texas North Central FIPS 4202 Feet
Data Source: HUD Exchange, U.S. Census Bureau, ACS



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

1	Priority Need Name	Affordable Housing
	Priority Level	▪ High
	Population	<ul style="list-style-type: none"> ▪ Extremely Low ▪ Low ▪ Moderate ▪ Special Populations: Elderly, Disabled, Homeless, Domestic Violence, Veterans ▪ Housing Choice Voucher and other Subsidized Housing recipients ▪ All Households – Individuals and Families
	Geographic Areas Affected	▪ City-Wide
	Associated Goals	<ul style="list-style-type: none"> ▪ Repair/Renovation/Rehabilitation of existing units ▪ Acquisition of existing units ▪ Production of new units ▪ Rental assistance
	Description	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.
	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.
2	Priority Need Name	Making Homelessness Rare, Brief and Nonrecurring
	Priority Level	▪ High
	Population	▪ People Experiencing and At-Risk of Homelessness
	Geographic Areas Affected	▪ City-Wide
	Associated Goals	<ul style="list-style-type: none"> ▪ Diversion/Prevention ▪ Street Outreach ▪ Emergency Shelter and Transitional Housing ▪ Permanent Housing: Rapid Re-housing and Permanent Supportive Housing ▪ Public Services
	Description	<p>The City is providing support for the community's Collective Impact Project, the Denton County Homelessness Leadership Team that seeks to:</p> <ul style="list-style-type: none"> ▪ 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 successful interventions to make Homelessness Rare, Brief and Nonrecurring. ▪ Increase access to housing by providing emergency, affordable housing and permanent supportive housing.

		<ul style="list-style-type: none"> ▪ Increase economic security by improving access to education, employment and mainstream programs and services to reduce financial vulnerability to homelessness.
	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.
3	Priority Need Name	Non-Housing Community Development: Public Services
	Priority Level	<ul style="list-style-type: none"> ▪ High
	Population	<ul style="list-style-type: none"> ▪ Extremely Low ▪ Low ▪ Moderate ▪ Special Populations: Elderly, Disabled, Homeless, Domestic Violence, Veterans
	Geographic Areas Affected	<ul style="list-style-type: none"> ▪ City-Wide
	Associated Goals	<ul style="list-style-type: none"> ▪ 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 substance use disorders, persons with HIV/AIDS and their families, victims of domestic violence and public housing residents
	Description	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.
	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.
4	Priority Need Name	Non-Housing Community Development: Public Facilities, Public Improvements and Infrastructure
	Priority Level	<ul style="list-style-type: none"> ▪ Medium
	Population	<ul style="list-style-type: none"> ▪ Extremely Low ▪ Low ▪ Moderate ▪ Special Needs: Elderly, Disabled, Homeless
	Geographic Areas Affected	<ul style="list-style-type: none"> ▪ City-Wide
	Associated Goals	<ul style="list-style-type: none"> ▪ Public Facilities ▪ Public Improvements and Infrastructure

		▪ Economic Development
	Description	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 capacity of 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.
	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.
5	Priority Need Name	Planning and Administration
	Priority Level	▪ High
	Population	▪ Other
	Geographic Areas Affected	▪ City-Wide
	Associated Goals	▪ Planning and Administration
	Description	Planning, management, and operations related to developing, administering, and carrying out the 2020-2022 Consolidated Plan Strategic Plan and Annual Goals and Objectives.
	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 53 – Priority Needs Summary

Narrative

The City’s approach to prioritization of needs identified in the Consolidated Plan were the result of enhanced coordination between public and assisted housing providers and private and governmental health, mental health and service agencies. City staff conducted the following activities to inform priority needs:

- Held public meetings;
- Utilized public comment periods
- Administered community surveys accessible online and in print for citizens and non-profit agencies;
- Actively participated in coalitions and committees;
- Maintained ongoing consultation with various city departments; and
- Regularly consulted 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

Affordable Housing Type	Market Characteristics that will influence the use of funds available for housing type
Tenant Based Rental Assistance (TBRA)	<p>Renters make up a majority in Denton (52%) and renters experience cost burden at a significantly higher rate than homeowners. 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.</p> <p>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.</p>
TBRA for Non-Homeless Special Needs	Same as Tenant Based Rental Assistance (TBRA) as listed above.
New Unit Production	<p>DHA wait list has over 13,000 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% and 30-50% AMI.</p> <p>In 2021, the City completed an Affordable Housing Assessment that established goals for new unit production over the next 5-10 years and supports the development of CDBG Neighborhood Revitalization Strategies.</p> <p>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.</p>
Rehabilitation	<p>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.</p> <p>For low-income homeowners, the City will offer home repair grants to address essential needs and/or improve access for the disabled persons through repair programs.</p> <p>For low-income renters, the City will offer rental rehab forgivable loans to address essential needs and/or improve access for the disabled persons.</p>

	<p>Other Ideas for consideration:</p> <ol style="list-style-type: none"> 1. Funding for improvements to existing low-income rental housing, with a goal of reinvestment in at least two 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.
Acquisition, including preservation	<p>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.</p> <ol style="list-style-type: none"> 1. For low-income homebuyers, the City will support a Homebuyers Assistance Program. 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 housing to prevent displacement of low income tenants, or construction of new affordable single and multi-family units as part of an overall neighborhood revitalization strategy.

Table 54 – Influence of Market Conditions

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

Introduction

Overall resources in 2023 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 funding source is used depends upon the various restrictions and regulations covering the funds and the most efficient and effective mix of funds.

Anticipated Resources

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Reminder of ConPlan: \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
CDBG	Public-federal	<ul style="list-style-type: none"> Administration Housing Public Improvements Public Services 	\$964,531	\$5,000	\$35,547.19	\$1,005,078	\$3,878,124	Denton is expecting level funding during the 2023-2027 ConPlan period.
HOME	Public-federal	<ul style="list-style-type: none"> Administration Housing 	\$513,327	\$68,355.93	\$0	\$581,682.93	\$2,326,731.72	Denton is expecting level funding during the 2023-2027 ConPlan period.

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 80% of Community Development staff, the City provides more public services funding than the CDBG maximum for entitlements (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 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 (the City's CHDO) to maintain and/or make available additional affordable housing units;
- Use of City funds and personnel to provide additional support for public facility projects; and
- Permanent mortgage loans (provided through local lending institutions) obtained by homebuyers participating in the City's Homebuyer Assistance Program.

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.

Responsible Entity	Responsible Entity Type	Role	Geographic Area Served
City of Denton Community Development	Government Department	CDBG and HOME Housing, public services and public and non-profit facility improvements.	City of Denton
Denton Housing Authority	PHA	Housing Choice Voucher, Develops Public Facility Corporations to develop affordable multi-family	City of Denton
Denton County Public Health Department	Government	ConPlan - Community Needs Assessment Healthy Communities Coalition	Denton County
Texas Dept. of Housing & Community Affairs	Government Department	Housing, Homelessness and Homeless At-Risk	State
Texas Homeless Network	Continuum of Care	ConPlan Consultation CoC Grant Homelessness	Balance of State Texas
Denton County Transportation Authority	Public Institution	Provision of public	Denton County
Housing Assistance Providers	Non-Profit Organizations	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.	Denton County
Non-profit public service agencies	Non-Profit Organizations	ConPlan Consultation Provide housing and public services assistance to households	City of Denton, Denton County
Local Realtors	Private Industry	Participate in the City's Homebuyer Assistance Program	City of Denton
Contractors	Private Industry	Participates repairs of housing and public facilities projects funded by the City	City of Denton

Table 56 - Institutional Delivery Structure

Assessment 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 leverage resources outside the scope of the Consolidated Plan. The City of Denton's investment in 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 demonstrate the success of the City's commitment to support systems improvement efforts.

However, there are limits to structural resources in different parts of the system creating "institutional" gaps. Denton's Institutional Delivery System is currently at capacity. Denton is a hub for resources in the county and institutions within the City are often tasked with serving an entire county population of people in need

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

Homelessness Prevention Services	Available in the Community	Targeted to Homeless	Targeted to People with HIV
Homelessness Prevention Services			
Counseling/Advocacy	X	X	X
Legal Assistance	X	X	
Mortgage Assistance	X		
Rental Assistance	X	X	X
Utilities Assistance	X	X	X

Street Outreach Services			
Law Enforcement	X	X	
Mobile Clinics	X	X	
Other Street Outreach Services	X	X	
Supportive Services			
Alcohol & Drug Abuse	X	X	
Child Care	X	X	
Education	X		
Employment and Employment Training	X	X	X
Healthcare	X	X	X
HIV/AIDS	X	X	X
Life Skills	X	X	X
Mental Health Counseling	X	X	X
Transportation	X	X	
Other			
Other			

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, “Assessment 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
- Continued investment by the City of Denton in capacity-building resources for local human service nonprofits

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 institutions (hospitals, jails, etc.) to address the ongoing housing and supportive services needs for those with chronic health and mental health issues leaving these institutions, resulting an increased dependence on Emergency Shelters.
- 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 coordinated system across service sectors to better match services to identified need;

- Identify and continuously evaluate the strengths and gaps in housing and supportive services including improving systems;
- Collect and utilize data that informs system-wide decision making for prioritizing and selecting high performing projects.
- Advocate for populations disproportionately impacted by gaps in these systems and collaborate with community partners to increase resources and improve systems

SP-45 Goals Summary – 91.215(a)(4)

Goals Summary Information

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
1	Affordable Housing	2023	2027	Affordable Housing	Denton City Limits	<ul style="list-style-type: none"> ▪ Repair/Renovation/Rehabilitation of existing units ▪ Acquisition of existing units ▪ Production of new units 	CDBG HOME	# Units: <ul style="list-style-type: none"> ▪ Repaired, Renovated Rehabilitated ▪ Acquired ▪ Produced
2	Making Homelessness Rare, Brief and Nonrecurring	2023	2027	Homelessness	Denton City Limits	<ul style="list-style-type: none"> ▪ Diversion/Prevention ▪ Street Outreach ▪ Emergency Shelter and Transitional Housing ▪ Permanent Housing ▪ Public Services 	CDBG General Fund	#/% Households: <ul style="list-style-type: none"> ▪ Evictions Prevented ▪ Moved from Unsheltered to Sheltered ▪ Exit shelter to PH, RRH, PSH ▪ Assisted w/ Services
3	Public Services	2023	2027	Non-Housing Community Development	Denton City Limits	<ul style="list-style-type: none"> ▪ Extremely Low, Low, Moderate Income households ▪ Individuals ▪ Families with Children ▪ Special Needs Populations 	CDBG General Fund	#/% Households assisted w/: <ul style="list-style-type: none"> ▪ 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	2023	2027	Non-Housing Community Development	Denton City Limits	<ul style="list-style-type: none"> ▪ Public Facilities ▪ Public Improvements and Infrastructure 	CDBG	#/% Households who benefit: Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit

Table 58 – Goals Summary

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.

o Goal 1 – Affordable Housing – 281 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.

o Goal 2 – Making Homelessness Rare, Brief and Nonrecurring – 2,105 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).

o Goal 3 – Public Services – 2,335 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 (467/yr). Services will address social determinants of health (SDOH): economic stability, education access and quality, health care access and quality, neighborhood and built environment and social and community context.

o Goal 4 – Public Facilities, Public Improvements and Infrastructure – 40,000 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, and home repair over the five-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 281 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. Refer to the Housing Needs Assessment portion of the Consolidated Plan for further details on these factors. 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 Assessment of Fair Housing and Affirmatively Furthering Fair Housing Goals (AFH-AFFH) in ATTACHMENT 2 as a part of this 2023-2027 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.

From MA-50. In 2021, the City completed the Affordable Housing Needs and Market Value Analysis with the goal to gather and analyze demographic and market data to further Community Service's 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 began work to implement [Denton's Affordable Housing Toolkit](#) (Toolkit), which includes 18 activities divided into 5 strategies to deliver innovative housing interventions related to acquisition, preservation, and construction of affordable housing units. The City's goal is to incentivize the creation of 4,300 affordable units in the next 10 years by targeting policy, funding, programs, and advocacy related to the 5 strategies:

- **Infill Development:** Infill development refers to the construction of new buildings on vacant or underutilized land in developed areas of the City. The Toolkit targets accessory dwelling units and small home community programs to this end.

- **Zoning Relief and Variances:** Zoning relief and variances combines adjustments to regulations with targeted incentives to enable the private sector to produce lower priced units through zoning overlays and development community input.

- **Increase Capacity and Resources:** The goal of increasing capacity and resources is to provide incentives, grant assistance, and technical assistance to the existing affordable housing development community and city partners to increase the output of new low-cost units. The activities aimed to further this goal include a non-capacity building grant, a developer incentive package, a pre-development financing program, and a low-income homeownership program.

- **Preservation:** Preservation activities include a housing trust incentive program, an employee homeownership program, land banking, a rental repair grant, and a down payment assistance program. Two of the five proposed activities have been partially or fully implemented in the City's Homeowner Repair Assistance program and Home Buyer Assistance program.

- **Increase Access to Information:** By increasing access to information for renters and landlords, the City endeavors to promote the existence and expansion of affordable housing and development. Goals under this strategy include an eviction prevention education campaign, an interactive mapping tool, and a DHA education campaign for voucher usage.

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 experience 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 in collaboration with community partner United Way of Denton County 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 awarded to community nonprofits. Street Outreach is provided in collaboration with city general funded nonprofit partner Giving Grace (GG). General funds in the amount of \$128,450 are allocated to Giving Grace for SO. Giving Grace collaborates outreach efforts with the Denton Police Department Homeless Outreach Team (HOT), which includes two officers, a paramedic, and a stability caseworker. Giving Grace and HOT identify locations where people are living unsheltered and meet with them in those locations to offer transportation to emergency shelter, complete coordinated entry, offer basic medical care, and refer to other community resources.

Efforts are also coordinated with partners through the housing crisis response system. Denton County Friends of the Family (DCFOF), Our Daily Bread (ODB), and The Salvation Army (TSA) Case Managers are reaching out to clients receiving emergency shelter and supportive services like food. 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. Our Daily Bread manages and operates the Denton Community Shelter that provides overnight emergency shelter and day shelter services 24 hours a day, seven days a week.

Addressing the emergency and transitional housing needs of homeless persons

Investment in SO, ES, TH, and RRH programs aims to reduce the length of time people experience homelessness by transitioning unhoused people from unsheltered to transitional and permanent housing. The programs are part of a housing-focused strategy coordinated through targeted case management that supports a stable transition to independent living. Emergency shelter and

transitional housing provides temporary stability while households are searching for permanent housing.

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; American Rescue Plan Act (ARPA) 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, \$400,000 in general funds have been allocated to Our Daily Bread (ODB), with an addition \$1,295,000 in ARPA funds to be allocated in mid-2023, 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 the Homeless Management Information System (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 general funds to support Homelessness Initiatives (\$80,000), and HMIS (\$15,000) in FY2022-23. 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. The coordinated entry process provides immediate assessment of needs and placement on the HPL, which prioritizes the most vulnerable individuals for referrals to housing programs. Coordinated entry and the HPL provide key data for the community to complete a comprehensive analysis of the housing crisis response system to identify unmet needs, gaps in housing options, and uses 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.

Increase funding for Rapid Re-Housing for families and individuals including housing location and stabilization resources. The City has allocated \$1,713,622 of Home Investment Partnerships – American Rescue Plan (HOME ARP) for Tenant Based Rental Assistance (TBRA) and Supportive Services. TBRA provides short to medium term rental assistance to qualifying populations, and

the City of Denton allocation plan identified a preference for Literal Homelessness. 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 FY2022-23. Other HUD CoC programs such as Giving Grace'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, ODB, 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 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 \$80,000 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, healthcare services, 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 awarded \$40,000 from the general fund to the Barriers Fund in FY2020 and FY 2021 to help reduce housing barriers. Based on the number of approved requests, the funding was expended within 6 months. In FY2022, the City awarded \$80,000 for the Barriers Fund to meet the increasing need for diversion and homeless prevention.

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), Our Daily Bread, Inc., and The Salvation Army Denton (TSA) in collaboration with PSH housing providers like GG 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. 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, rental 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) pamphlets, *Protect Your Family From Lead In Your Home* and *Renovate Right* 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 and increase opportunities 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 five social determinants of health that impact the conditions of poverty in Denton including:

1. Economic Stability;
2. Education Access and Quality;
3. Health Care Access and Quality;
4. Neighborhood and Built Environment; and
5. Social and Community Context.

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 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 2023-2027 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, construction, 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.

Construction. Construction inspections are made during each phase of a project, and Housing Property Standards inspections are made at all HOME-funded housing locations. If applicable, on-site interviews of construction workers are conducted to verify Davis-Bacon wage rate requirements.

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 manager 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 CD manager 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. CDBG funded are monitored on a yearly basis. 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. CHDO'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 inspections of all HOME assisted units per federal regulations.

2023-2027 City of Denton Consolidated Plan

FOR HOUSING
& COMMUNITY DEVELOPMENT

2023 ACTION PLAN

HOUSEHOLDS	PRIORITY
56	AFFORDABLE HOUSING
421	MAKING HOMELESSNESS RARE, BRIEF & NONRECURRING
467	PUBLIC SERVICES
8,000	PUBLIC FACILITIES, IMPROVEMENTS & INFRASTRUCTURE

**A REPORT FOR THE U.S. DEPARTMENT OF HOUSING &
URBAN DEVELOPMENT**

Community Development Block Grant (CDBG) Program
HOME Investment Partnership (HOME) Program

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

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
CDBG	Public-federal	<ul style="list-style-type: none"> Administration Housing Public Improvements Public Services 	\$964,531	\$5,000	\$35,547.19	\$1,005,078	\$3,878,124	Denton is expecting level funding during the 2023-2027 ConPlan period.
HOME	Public-federal	<ul style="list-style-type: none"> Administration Housing 	\$513,327	\$68,355.93	\$0	\$581,682.93	\$2,326,731.72	Denton is expecting level funding during the 2023-2027 ConPlan period.

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 2023-24 program year, CDBG and HOME projects will leverage an additional \$59,603,469 in federal, state, local, and private fund and include the following:

Proposed General Funds for human services activities	\$370,000
Federal Funds for human services activities	\$20,025,990
State Funds for human services activities	\$2,794,902
Local Funds for human services activities	\$5,521,177
Private Funds for human services activities	\$30,891,400

The above list includes proposed General and ARP-SLFRF Funds from the City of Denton. General and ARP-SLFRF fund recommendations will be considered during the normal budgeting cycle and considered for approval in September 2023.

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 \$132,588 for the 2023-24 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 publicly 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

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	CDBG/HOME Funding	Goal Outcome Indicator
1	Affordable Housing	2023	2027	Affordable Housing	Denton City Limits	Affordable Housing	\$449,730.74 CDBG \$679,730.74 HOME	LMI Households/Individuals
2	Making Homelessness Rare, Brief and Nonrecurring	2023	2027	Homelessness	Denton City Limits	Homelessness and At-Risk	\$50,000 CDBG	Homeless/At-Risk Households/Individuals
3	Non-Housing Community Development: Public Services	2023	2027	Non-Housing Community Development	Denton City Limits	Public Services	\$144,679 CDBG	LMI Households/Individuals
4	Non-Housing Community Development: Public Facilities, Public Improvements and Infrastructure	2023	2027	Non-Housing Community Development:	Denton City Limits	Public Facilities, Public Improvements and Infrastructure	\$230,000 CDBG	LMI Households/Individuals
5	Planning and Administration	2023	2027	Planning	Denton City Limits	Administration	\$180,668 CDBG \$51,332 HOME	N/A

Table 60 – Goals Summary

Goal Descriptions

- 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 2023-2027 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 2023-24 program year is \$1,586,760.67 and includes \$35,546.74 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 and \$50,000 in American Rescue Plan Act's State and Local Fiscal Recovery Funds (ARP-SLFRF).

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 2023-24 program year. Below is the list of projects that are recommended to be funded with General Funds and ARP-SLFRF funds for the 2023-24 fiscal year.

Project Name	Amount
Children's Advocacy Center	\$27,500
Court Appointed Special Advocates (CASA)	\$36,000
Communities in Schools	\$27,500
Denton Christian Preschool	\$25,179
Denton County MHMR Center	\$28,000
Grace Like Rain, Inc.	\$50,000
Health Services of North Texas	\$50,000
Our Daily Bread	\$45,000
PediPlace	\$30,000
North Texas Solutions for Recovery, Inc.	\$50,000
Special Programs for Aging Needs	\$821
Sub-Total General Fund Human Services Grant	\$350,000
Development Fee Grant Program	\$225,000
Children's Advocacy Center – Fairshare	\$189,975
Barrier's Funds – Diversion	\$40,000
HMIS	\$18,850
Homeless Initiatives	\$80,000
ODB/Shelter Grant	\$400,000
Rapid Rehousing	\$100,000
Street Outreach	\$64,600
Sub-Total General Fund Fairshare/Homelessness/Affordable Housing Initiatives	\$1,118,425
TOTAL GENERAL FUND - FY 2023-24	\$1,46,425

Projects

#	Project Name
1	2023 Community Development Administration
2	2023 DAHC Rental Rehabilitation
3	2023 Denton City County Day School
4	2023 Denton County Friends of the Family
5	2023 Fred Moore Park Improvements
6	2023 Habitat for Humanity of Denton County
7	2023 Home Repair Program
8	2023 PARD Summer Camp
9	2023 Special Programs for Aging Needs

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

1	Project Name	2023 Community Development Administration
	Target Area	N/A
	Goals Supported	N/A
	Needs Addressed	N/A
	Funding	CDBG: \$180,668 HOME: \$51,332
	Description	Program administration for the CDBG and HOME grants and includes program management, coordination, and monitoring associated with carrying out eligible activities.
	Target Date	10/1/2023
	Estimate the number and type of families that will benefit from the proposed activities	N/A
	Location Description	Administration services are carried at the Community Development Division at 401 N. Elm St, Denton Texas 76201
	Planned Activities	Funds will be used to cover the cost of planning, administering, operating and monitoring the CDBG and HOME programs.
2	Project Name	2023 DAHC Rental Rehab Program
	Target Area	N/A
	Goals Supported	Affordable Housing
	Needs Addressed	Rental Housing
	Funding	HOME: \$221,000

	Description	Rehabilitation and operating costs of rental units owned by the Denton Affordable Housing Corp, a certified CHDO. Funding also includes \$21,000 for CHDO Operating Costs. DAHC's rental units are rented to low- and moderate-income renters.
	Target Date	10/01/2023
	Estimate the number and type of families that will benefit from the proposed activities	<u>2</u> low and very low-income households
	Location Description	3813 Camelot Street, Denton Texas 76208
	Planned Activities	Rehabilitate 2 rental units that are rented to low- and very low-income households.
	Planned Activities	Rehabilitate 2 rental units that are rented to low- and very low-income households.
3	Project Name	2023 Denton City County Day School
	Target Area	N/A
	Goals Supported	Public Services
	Needs Addressed	Family Stability
	Funding	CDBG: \$25,000
	Description	Denton City County Day School to provide quality early childhood education to low-income children between the ages of 2 and 5 years.
	Target Date	10/01/23
	Estimate the number and type of families that will benefit from the proposed activities	low and moderate-income persons
	Location Description	Denton City County Day School; 1603 Paisley St; Denton TX 76209
	Planned Activities	Funds will cover a portion of the salaries for two (2) Lead Teachers.
4	Project Name	2023 Denton Co. Friends of the Family
	Target Area	N/A
	Goals Supported	Making Homelessness Rare, Brief and Nonrecurring

	Needs Addressed	Homelessness and At-Risk
	Funding	CDBG: \$50,000
	Description	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.
	Target Date	10/01/2023
	Estimate the number and type of families that will benefit from the proposed activities	low and moderate-income persons
	Location Description	Address is suppressed.
	Planned Activities	Funds will cover the cost of the Shelter Director Salary.
	Planned Activities	Funds will cover the cost of the Shelter Director Salary.
5	Project Name	2023 Fred Moore Park Improvements
	Target Area	N/A
	Goals Supported	Public Facilities, Public Improvements and Infrastructure
	Needs Addressed	Public Facilities, Public Improvements and Infrastructure
	Funding	CDBG: \$230,000
	Description	Funds will go towards a shade structure and ADA accessible walkway to the dugouts of Fred Moore Park
	Target Date	10/01/2023
	Estimate the number and type of families that will benefit from the proposed activities	2630 people
	Location Description	Fred Moore Park – 501 S. Bradshaw, Denton Texas 76205
	Planned Activities	Funds will cover the cost of installing a shade structure and construction of walkway.

6	Project Name	2023 Habitat for Humanity of Denton County
	Target Area	Denton City Limits
	Goals Supported	Affordable Housing
	Needs Addressed	Affordable Housing
	Funding	HOME: \$309,350.93
	Description	The project consists of assisting with the development of the Habitat Neighborhood Community with infrastructure costs. The project will provide 4 affordable homes for low and moderate-income households
	Target Date	9/30/2025
	Estimate the number and type of families that will benefit from the proposed activities	4 low and moderate-income households
	Location Description	Tract of land is located in Southeast Denton between Duncan St. and Hill St. and along Smith St.
	Planned Activities	Funds will be used for construction costs for new an affordable housing development.
7	Project Name	2023 Minor Repair Program
	Target Area	N/A
	Goals Supported	Affordable Housing
	Needs Addressed	Home Repair
	Funding	CDBG: \$449,730.74
	Description	Program addresses urgently needed repairs of homes (repairs costing less than \$24,500. 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: \$15,761.12 in 2022 and \$19,785.62 in 2021 CDBG funds.
	Target Date	10/01/2023

	Estimate the number and type of families that will benefit from the proposed activities	33 low and moderate-income households
	Location Description	This is a city-wide program. Applications are taken at the Community Development Division at 401 N. Elm St., Denton Texas 76201
	Planned Activities	Funds will be used for rehabilitation costs for minor repairs.
8	Project Name	2023 PARD Summer Kids Camp
	Target Area	N/A
	Goals Supported	Public Services
	Needs Addressed	Summer camp
	Funding	CDBG: \$45,000
	Description	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.
	Target Date	10/01/2023
	Estimate the number and type of families that will benefit from the proposed activities	56 low and moderate-income persons
	Location Description	Civic Center, Denia Recreation Center, McMath Middle School, and MLK Recreation Center
	Planned Activities	Funds will cover the cost of camp scholarships.
9	Project Name	2023 Special Programs for Aging Needs
	Target Area	N/A
	Goals Supported	Public Services
	Needs Addressed	Food Security
	Funding	CDBG: \$24,679

Description	Special Programs for Aging Needs (SPAN), Inc. to provide senior nutrition program providing nutritional home delivered and congregate meals for senior adults in Denton.
Target Date	10/01/2023
Estimate the number and type of families that will benefit from the proposed activities	420 persons low and moderate-income persons.
Location Description	Select Senior Centers and Senior Apartments Communities
Planned Activities	Funds will pay for a portion of the cost for meals.

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 Services Advisory Committee evaluates which requests meet the community development needs and make recommendation to City Council.

Geographic Distribution

Target Area	Percentage of Funds
City of Denton, TX (City Limits)	100%

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 thirty-three (33) households in our Home Repair Programs, assist four (4) households through Habitat for Humanity of Denton County, and provide funding for the CHDO's Rental Rehabilitation program assisting two (2) households, the City's one-year goal is to assist thirty-eight (38) households in PY 2023-24 with CDBG and HOME.

One Year Goals for the Number of Households to be Supported	
Homeless	0
Non-Homeless	39
Special-Needs	0
Total	39

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

One Year Goals for the Number of Households Supported Through	
Rental Assistance	0
The Production of New Units	4
Rehab of Existing Units	35
Acquisition of Existing Units	0
Total	39

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. The grant will reduce development costs by covering development fees in to support new construction of Affordable Housing Units. The City expects to receive applications for 2-3 projects in FY 2023-24.

As a requirement to receive federal funding from the U.S. Department of Housing and Urban Development (HUD), the City of Denton Community Services Department prepares and submits to the Council what is known as a five-year Consolidated Plan (ConPlan) and an Annual Action Plan. The Annual Action Plan (AAP) is used to outline how federal Community Development Block Grant funds, HOME funds and other federal and non-federal program funds will be used by the City in the upcoming fiscal year.

When the City provides assistance to homeowners for HOME-assisted housing units, the purchase price and appraisal value may not exceed 95% of the median purchase price for the city. The HUD-derived

formula for determining home values used data from July 2016 through June 2021 and was implemented beginning in June 2022. These data lagged behind the market and have limited what the city can do based on these lower values. The city, per HUD guidelines, performed its own market study to determine more accurate values using more recent data. The proposal is to amend the FY22 Annual Action Plan to include the higher values from the city's study.

The City is proposing updating median home values for use in HOME programs. The HUD derived data for use with HOME grant funding and homebuyer assistance programs used home sales data from July 2016 through June 2021 with implementation beginning in June 2022. Historically, home sale data from such a recent study would provide data accurate enough to effectively operate the programs. However, given that home values and purchase prices are increasing rapidly, the HUD data is low compared to the current market. As per HUD guidelines, the city performed its own market study to determine home values for the city of Denton for use in determining HOME value limits. HOME-assisted housing units may not exceed 95% of median purchase price for the city. The newer data from the city's market study increases that threshold providing a wider variety of housing for which the city may provide assistance.

City of Denton Proposed New Value Limits

City of Denton, Texas Compilation of Single Family Existing Real Estate Sales for a 12-Month Period March 2022 – February 2023

Unit Type	Data Range	Sales Volume	Median Value	95% Median
Single Family – Existing & New	3/1/2022-2/28/2023	1712	\$395,000	\$375,250

Insufficient data available for new construction; new construction and existing single-family home value are combined.

There is no change to the Annual Action Plan Budget with proposed Amendment #1.

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 1,876 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 2023-24 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 (GF - Public Services Grant)
 - Fund Homeless Outreach Team (Officers, Paramedic, and Stability Case Worker) (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 Our Daily Bread (GF - Public Services Grant and Council Initiatives, ARPA)
 - Fund Our Daily Bread and Giving Grace (HOME ARP – TBRA and Supportive Services)
 - Fund Denton County Friends of the Family Emergency Shelter \$40,000 with CDBG funds
 - 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 TBRA Program (HOME-ARP)
 - Fund Interfaith – Utility Assistance (GF – Utilities Grant)
 - United Way Homeless Initiatives and Barriers Fund (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 and Barriers Fund (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 and Barriers Fund (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 Graceec. and Denton County MHMR
- **Shortening the length time that individuals and families experience homelessness.**
 - United Way Homeless Initiatives and Barriers Fund (GF - Public Services Grant)
 - Housing Crisis Response System: Coordinated Entry (CE)
 - Housing Crisis Response System: Housing Priority List (HPL)
 - Fund Transitional Shelter (ARPA)

- **Facilitating Access.**

- United Way Homeless Initiatives and Barriers Fund (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 and Barriers Fund (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

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 PY2023-24 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 2023-24 program year to address barriers in affordable housing identified in the 2023-2027 Assessment of Fair Housing and Affirmatively Furthering Fair Housing Goals (AFH-AFFH).

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 Assessment of Fair Housing and Affirmatively Furthering Fair Housing Goals (AFH-AFFH) in ATTACHMENT 2 as a part of the 2023-2027 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**
 - Coordinate with Denton County Transportation Authority (DCTA) to improve access to transit resources (stops, route locations, schedules, and covered bus stops to provide shelter in inclement weather.)
 - Continue housing programs designed to ensure that affordable, accessible housing is available throughout Denton, including the Housing Tax Credit (HTC) program, Home Repair and Home Buyer Assistance programs, and incentivization of private development through the implementation of the Affordable Housing Strategic Toolkit
 - Provide public service funding that contributes to the Social Determinants of Health – economic stability, neighborhood, education, food security, community, safety and social healthcare system to promote all areas of Denton to high-opportunity areas.
- **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.

- 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.
- Implement activities in support of the Denton Affordable Housing Strategic Toolkit's Five Strategies – infill development, zoning relief and variances, increase capacity and resources, preservation, and increase access to information. For more information on the Toolkit, refer to AFH-AFFH in ATTACHMENT 2 and SP-55.

▪ **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, with an emphasis on accessible units.
- 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**

- 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.
- 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.)
- Implement activities in support of the Denton Affordable Housing Strategic Toolkit's Five Strategies – infill development, zoning relief and variances, increase capacity and resources, preservation, and increase access to information. For more information on the Toolkit, refer to AFH-AFFH in ATTACHMENT 2 and SP-55.

▪ **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.
- 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.
- Implement the City of Denton's non-discrimination ordinance.
- **Increase supports and services for residents with housing assistance:**
 - Provide public service funding that contributes to the Social Determinants of Health – economic stability, neighborhood, education, food security, community, safety and social healthcare system to promote all areas of Denton to high-opportunity areas.
 - Improve the housing crisis response system programs, including street outreach, diversion and prevention, emergency and transitional short-term supportive housing, and permanent supportive housing to people experiencing or at-risk of experiencing homelessness.

Discussion: See discussion above.

AP-85 Other Actions – 91.220(k)

Introduction

This section reports additional effects the City will undertake during the 2023-24 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 2023-24 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, Rental Repair 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 2023-24 program year, the City actions will be:

1. Affordable housing assistance programs:
 - a. Allocated funding to Implement or provide grants for Preserving Affordable housing through Repair, Renovation, Reconstruction, and Rental Rehabilitation projects.
 - b. Allocated funding to the Development Fee Grant to projects in support the creation of Affordable Housing units (GF – Affordable Housing Grant)
 - c. Allocate funding for utility assistance programs that increase Housing Stability and Prevent Homelessness (See also: AP-65):
 - d. Allocate funding for Public Services Grants for rental assistance increase Housing Stability and Prevent Homelessness (See also: AP-65) (GF - Public Services Grant):
 - e. Implementation of Affordable Housing Assessment (GF - FY2019-20)

2. Allocate funding for Public Services, Facility, and/or Infrastructure Grants to combat Food Insecurity;
 - a. Human Services Grant (CDBG/GF - Public Services Grant)
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)
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)
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):
 - ° Human Services Grant (CDBG/GF - Public Services Grant)
6. Public Services, Facility and/or Infrastructure Grants to make homelessness rare, brief, and nonrecurring (See also: AP-65):
 - a. Utilities Grant (GF - Budget)
 - b. Human Services Grant (GF - Public Services Grant)
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)
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)

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 2023-24 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 2023-24 program year. The City is part of a strong team of service providers who are working to improve services.

Discussion

While the PY2023-24 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

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
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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.



CITIZEN PARTICIPATON PLAN

2023-2027

PREPARED BY:
CITY OF DENTON
COMMUNITY DEVELOPMENT
401 N. Elm
Denton, TX 76201
Phone: (940) 349-7726

Draft: May 12, 2023



CITIZEN PARTICIPATION PLAN 2023-2027

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. These plans, along with other information about the City's programs and projects are available throughout the year on the City's webpage at www.cityofdenton.com.

This COD CPP sets forth the City's policies and procedures for citizen participation in development of these plans or amendments, and will become effective October 2023, the first year of 2023-2027 Consolidated Plan and as amended. The COD CPP will be provided as a supplement to the 2023-2027 Consolidated Plan for Housing and Community Development, and hard copies will be made available to the public upon request.

Citizens and organizations can provide comments on activities to Community Development through the following channels:

- By mail, 401 N. Elm St. Denton, TX 76201;
- By phone, 940-349-7726;
- By email, communitydevelopment@cityofdenton.com; or
- By fax, 940-349-7753.

SECTION 1: METHODS OF CITIZEN INVOLVEMENT

The COD CPP provides residents an overview of the City's plan to actively encourage widespread citizen participation in the development of the federal reports listed in the previous section, particularly those residents who are predominantly low- and moderate-income. The COD CPP also encourages local and regional institutions and other organizations (including businesses, developers, and community and faith-based organizations) in the process of developing and implementing the Consolidated Plan and related reports. The City will take appropriate actions to encourage the participation of all its residents, including persons of minority backgrounds, persons with limited-English proficiency, and persons with disabilities. The City will encourage resident participation by providing residents access to Meetings and Information through the following activities.

- Meetings:
 - Hold public hearings and post public notices of meetings;



CITIZEN PARTICIPATION PLAN

2023-2027

- Provide technical assistance for individuals, agencies and groups that request assistance, including groups representing 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 drafts of all plans or amendments;
 - Set a period of time for public comment and review; and
 - Provide a timely response to written complaints and grievances.

ACCESS TO MEETINGS

The City will afford adequate, timely notification for residents to attend local meetings and public forums and be involved in decision-making pertaining to plans and amendments referenced in the COD CPP.

Public Hearings

Public hearings are held at a convenient time and location for persons who may be affected by the proposed funding, are accessible to persons with disabilities and are 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 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. Notices announcing public hearing and meetings and relevant information will be sent out via email, ,posted on the City's website and posted in public facilities such as the City's libraries, recreation centers, and offices.

Technical Assistance

The City will provide technical assistance upon request and to the extent resources are available to groups or individuals that need assistance in preparing funding proposals, provided that the level of technical assistance does not constitute a violation of federal or local rules or regulations. The provision of technical assistance does not involve re-assignment of City staff to the proposed project or group, or the use of City equipment, nor does technical assistance guarantee an award of funds.

ACCESS TO INFORMATION



CITIZEN PARTICIPATION PLAN

2023-2027

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, individuals with disabilities or individuals otherwise not able to visit the Community Development office. The information may 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 Plans or Amendments

The City will publish its proposed plan(s) so that residents have sufficient opportunity to review and provide comments. The requirement for publishing will be met by providing a summary of the proposed plan or amendment in a newspaper of general circulation and making copies available on the City's website. Information regarding how to access the plan(s) will be posted in public facilities such as the City's libraries, recreation centers, and offices. The summary will describe the contents and purpose of the plan(s) and include information regarding how to access the plan for review.

Comments

A period of not less than thirty (30) days will be provided to the public for review and comment on the proposed plan(s) prior to submission to HUD. The City will consider the views of residents, public agencies and other interested parties in preparing its final plan(s), and include a summary of comments as an attachment to final versions. 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.

SECTION 2: ANNUAL CITIZEN PARTICIPATION PROCESS

The annual citizen participation process for the City's Action Plan and/or Consolidated Plan will consist of ten (10) steps outlined in this section.

General procedure for communicating Action Plan and/or Consolidated Plan information with the public throughout the process will include:

- Posting public notices and informational packets on the City's website; and
- Sending information to interested persons, organizations, groups and the media (both in English and in Spanish); and



CITIZEN PARTICIPATION PLAN 2023-2027

- Ensuring materials are available and procedures are in place to provide information to or receive comments from non-English speakers.

STEP 1. Conduct public workshop and survey to identify housing and community development needs and review program performance.

The City will provide at least two public hearings during each program year cycle. The first public hearing will be a workshop related to the community's unmet needs and priorities, and will usually take place before the Notice of Funding Availability (NOFA) goes out for the upcoming grant funding cycle. The workshop will be conducted 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. A survey is also conducted during this time to gather additional feedback regarding community needs.

Following the public workshop and survey period, the information gathered will be presented to the Community Services Advisory Committee for consideration during the upcoming funding cycle.

STEP 2. Notice of Funding Availability & 30-Day Application Period

A minimum of (thirty) 30 days will be allowed for the receipt of applications for proposed activities for the development of the Annual Action Plan. 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 CSAC.

STEP 3. Review of Applications and Recommendations by the CSAC

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

STEP 4. CSAC Adopts Recommendation for Proposed Activities and Allocation of Funds

The CSAC 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 CSAC's recommendation to City Council and applicants.



CITIZEN PARTICIPATION PLAN 2023-2027

STEP 5. 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 CSAC's recommendation for proposed activities and allocation of funds. This second public hearing will be held before or while the proposed Consolidated Plan and/or Annual Action Plan is published for comment. This public hearing meeting will usually take place in a scheduled May or June 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).

STEP 6. 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 Section 2, Step 2 for locations). As per HUD regulations, a reasonable number of free printed copies will be made available to individuals and groups that request it.

STEP 7. 30-Day Public Review Period of Proposed Consolidated Plan / Annual Action Plan

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
401 N. Elm St. Denton, TX 76201
Phone: (940) 349-7726

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.

Public notices will be published in the Denton Record Chronicle, 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 requesting comments. A bilingual staff member is available for non-English speaking persons to request information or file a comment.



CITIZEN PARTICIPATION PLAN 2023-2027

STEP 8. 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 (401 N. Elm St. Denton, TX 76201) and the City's website at www.cityofdenton.com.

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

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

STEP 9. 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 25% 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. 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. If a substantial amendment occurs outside of the Action Plan process, notification will be provided to the CSAC. 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 6 through 9 of the entire citizen participation process be repeated.



CITIZEN PARTICIPATION PLAN 2023-2027

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. 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, has declared an emergency, or national or local health authorities recommend 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 plans will be limited to online review on the City's website; and
4. Public comments will be accepted by email, phone, fax, and during a virtual public hearing.

STEP 10. 15-Day Public Review Period of Consolidated Annual Performance and Evaluation Report (CAPER)

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 and attach a summary of such comments to the final HUD report.



CITIZEN PARTICIPATION PLAN 2023-2027

SECTION 3: GENERAL PLAN ADOPTION 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.; and/or
- 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.



CITIZEN PARTICIPATION PLAN 2023-2027

SECTION 4: CDBG/HOME FUNDING CYCLE TIMELINE (subject to change depending on grant allocation process)

Month:	Actions Taken:
October	Needs Assessment Public Workshop & Community Survey
November	Community Services Advisory Committee (CSAC) Regular Meeting to review upcoming application
December	Notice of Funding Opportunity released and application open / On-demand application workshop made available (mandatory viewing for first-time applicants)
February	Deadline for applications, staff analysis of applications, CSAC to review criteria, prepare for applicant presentations
March/April	CDAC Regular Meetings to hear applicant presentations, and special CDAC meeting to conduct deliberations.
May/June	City Council / Public Hearing Item on proposed plan. Begin 30-day review period of proposed Annual Action Plan based on the City Council's decision.
July	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.



CITIZEN PARTICIPATION PLAN 2023-2027

SECTION 5: 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. A listserv will be used for general mass communications.

- **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.

- **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.



CITIZEN PARTICIPATION PLAN 2023-2027

SECTION 6: 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 plan(s), 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 and 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 to them 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 Department.

City of Denton
Community Development
401 N. Elm St. Denton, TX 76201
Phone: (940) 349-7726



CITIZEN PARTICIPATION PLAN 2023-2027

SECTION 7: DEFINITIONS

Annual Action Plan	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 priorities established in 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.
CDBG	The 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.
CHDO	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.
CAPER	The 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 CAPER is an assessment of the City's progress in accomplishing the goals of the Annual Action Plan and the Consolidated Plan.
Consolidated Plan	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.
HOME	The Home Investment Partnerships (HOME) Program 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.
HUD	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.



2023-2027
ASSESSMENT OF FAIR HOUSING
&
AFFIRMATIVELY FURTHERING
FAIR HOUSING GOALS

PREPARED BY:
CITY OF DENTON
COMMUNITY DEVELOPMENT
401 N. Elm
Denton, TX 76201
Phone: (940) 349-7726

October 1, 2023



ASSESSMENT OF FAIR HOUSING PLAN & AFFIRMATIVELY FURTHERING FAIR HOUSING GOALS

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ASSESSMENT OF FAIR HOUSING PLAN & AFFIRMATIVELY FURTHERING FAIR HOUSING GOALS

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ASSESSMENT OF FAIR HOUSING PLAN & AFFIRMATIVELY FURTHERING FAIR HOUSING GOALS

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ASSESSMENT OF FAIR HOUSING PLAN & AFFIRMATIVELY FURTHERING FAIR HOUSING GOALS

EXECUTIVE SUMMARY

The City of Denton's Assessment of Fair Housing & Affirmatively Further Fair Housing Goals document is part of our City's consolidated planning process. It provides the complement to the Consolidated Plan for Housing and Community Development (ConPlan) supporting the City's commitment to affirmatively furthering fair housing.

Title VIII of the "Civil Rights Act of 1968" Fair Housing Requirements

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 (AFFH). The obligation to affirmatively further fair housing requires recipients of HUD funds such as the City of Denton to take meaningful actions, in addition to combating discrimination, that overcome patterns of segregation and foster inclusive communities free from barriers that restrict access to opportunity based on protected characteristics, which are:

- Race
- Color
- National origin
- Religion
- Sex (including gender identity and sexual orientation)
- Familial status
- Disability

Generally, in administering programs and activities relating to housing and community development, the federal government, HUD, and its recipients (City) must:

- Determine who lacks access to opportunity and address any inequity among protected class groups
- Promote integration and reduce segregation
- Transform racially or ethnically concentrated areas of poverty into areas of opportunity

SOURCE: https://www.hud.gov/program_offices/fair_housing_equal_opp/affh



ASSESSMENT OF FAIR HOUSING PLAN & AFFIRMATIVELY FURTHERING FAIR HOUSING GOALS

North Texas Regional Housing Assessment (NTRHA)

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)

HUD encouraged program participants to collaborate in submitting a joint Assessment of Fair Housing 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. 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)

The NTRHA project ended on May 23, 2018. However, HUD Secretary Carson indefinitely suspended the 2015 AFFH Rule reverting jurisdictions back to reporting requirements in place prior to the rule. NTRHA completed its analysis for the City and submitted the *City of Denton Assessment of Fair Housing* (Denton AFH) in October 2018 (Appendix 1). The Denton AFH was adopted as an exhibit to the City’s 2020-2022 Fair Housing Plan & Analysis of Impediments.

City of Denton Assessment of Fair Housing

The Denton AFH provides the City with meaningful data, identification of fair housing issues, and analysis of contributing factors that informs the City’s fair housing goals. It documents the City’s certification to affirmatively further fair housing across all the City’s activities and programs relating to housing and urban development.



ASSESSMENT OF FAIR HOUSING PLAN & AFFIRMATIVELY FURTHERING FAIR HOUSING GOALS

Results of the Denton AFH are summarized as follows (Denton AFH, 13):

- **Community participation** (Denton 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** (Denton AFH, 37) – The City of Denton makes 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** (Denton 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** (Denton, 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.

Affirmatively Furthering Fair Housing Interim Final Rule

HUD's 2021 Interim Final Rule (IFR), ["Restoring Affirmatively Furthering Fair Housing Definitions and Certifications,"](#) (June 10, 2021) requires program participants to submit certifications that they will affirmatively further fair housing (AFFH) in connection with their consolidated plans, annual action plans, and PHA plans. The IFR does not require a specific planning process such as the one in the 2015 AFFH Rule. The IFR allows a program participant to engage in a fair housing planning process that supports its certification that it is affirmatively furthering fair housing.

To support these certifications, the IFR creates a voluntary fair housing planning process for which commits HUD to providing technical assistance and support. HUD is putting itself and its program participants back in a position to take meaningful steps towards improved fair housing outcomes.

The Interim Final Rule (IFR) restores the definitions of affirmatively furthering fair housing and the definition of meaningful actions.



ASSESSMENT OF FAIR HOUSING PLAN & AFFIRMATIVELY FURTHERING FAIR HOUSING GOALS

Affirmatively furthering fair housing means taking meaningful actions, in addition to combating discrimination, that overcome patterns of segregation and foster inclusive communities free from barriers that restrict access to opportunity based on protected characteristics.

Specifically, affirmatively furthering fair housing means taking meaningful actions that:

1. Address significant disparities in housing needs and in access to opportunity,
2. Replace segregated living patterns with truly integrated and balanced living patterns,
3. Transforming racially or ethnically concentrated areas of poverty into areas of opportunity, and
4. Foster and maintain compliance with civil rights and fair housing laws.

Meaningful actions means significant actions that are designed and can be reasonably expected to achieve a material positive change that affirmatively furthers fair housing by, for example, increasing fair housing choice or decreasing disparities in access to opportunity.

Citizen Participation Plan

The IFR does not have a public participation requirement specific to fair housing planning; instead, program participants follow the public participation requirements of the ConPlan. These AFFH GOALS* are included in the public engagement requirements in the City's Citizen Participation Plan (CPP). The CPP provides the public reasonable opportunities for meaning involvement in the planning process and the incorporation of these goals into the ConPlan including the AFH planning. Description of outreach activities undertaken, organizations consulted, evaluation of efforts and summary of comments is provided in the ConPlan.

**There is also no specific guidance to suggest when AFH plans should be updated, but the City of Denton generally conducts a review and makes updates to our when we update the ConPlan.*



ASSESSMENT OF FAIR HOUSING PLAN & AFFIRMATIVELY FURTHERING FAIR HOUSING GOALS

ANALYSIS OF FAIR HOUSING ISSUES

The Denton AFH identified five fair housing issues in the North Texas Region (Denton 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 in public engagement activities emphasized five issues (Denton 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.



ASSESSMENT OF FAIR HOUSING PLAN & AFFIRMATIVELY FURTHERING FAIR HOUSING GOALS

AFFIRMATIVELY FURTHERING FAIR HOUSING GOALS

The City of Denton is committed to affirmatively furthering fair housing. Building off the analysis and public input, the Denton AFH identified six goals that form the foundation for action in affirmatively furthering fair housing (Denton AFH, 14) so that there is safe, affordable housing with access to opportunity and supportive services for residents in the City of Denton.

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

ASSESSMENT OF FAIR HOUSING & 2023-2027 AFFIRMATIVELY FURTHERING FAIR HOUSING GOALS

Detailed data* on issues such as segregation/integration, racially or ethnically concentrated areas of poverty (R/ECAPs), disparities in access to opportunity, and disproportionate housing needs, are discussed in the City's ConPlan and the City of Denton Assessment of Fair Housing so these are not restated here. Instead the assessment of the fair housing data, issues, and contributing factors as well as assessment of past actions are summarized under each of the City's AFFH goals.

- The Goal is the stated objective to overcome the significant contributing factors identified in the AFH as creating, contributing to, perpetuating, or increasing the severity of one or more fair housing issues. It contains the:
 - Description;
 - Contributing Factor(s); and
 - Fair Housing Issue(s)
- The 2020-2022 Assessment of Past Actions Table lists:
 - the activities undertaking toward achieving the stated goal;
 - timeline and Metrics that measure what fair housing results will be achieved including the timeframes for achieving them; and
 - the entity or entities responsible for each goal action item.
- 2020-2027 Proposed Actions Table (same as above)

*Affirmatively Furthering Fair Housing Data Source: <https://egis.hud.gov/affht/>



ASSESSMENT OF FAIR HOUSING PLAN & AFFIRMATIVELY FURTHERING FAIR HOUSING GOALS

GOAL 1: Increase Access to Affordable Housing in High-Opportunity Areas

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

Contributing Factor(s)

- 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 Issue(s)

- 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 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, 2021). One census tract in Denton meets the criteria for a R/ECAP, based on American Community Survey data. The R/ECAP tract is in Denton's Denia neighborhood and surrounded by West Hickory Street, South Bonnie Brae Street, Willowood Street, and Kendolph Drive.

2020-2022 Assessment of Past Goals and Actions

Proposed Action(s)	Metrics, Milestones, and Timeline for Achievement	Responsible Program Participants
Training for realtors and lenders to help families make informed housing choices in high opportunity areas.	Timeline: 2020-2022 ConPlan Metrics: <ul style="list-style-type: none">▪ 5 Realtor/Lender Trainings	<ul style="list-style-type: none">▪ CoD Community Development
Increasing down payment assistance to bring down the overall home cost and make it affordable to lower AMI households.	Timeline: 2020-2022 ConPlan Metrics: <ul style="list-style-type: none">▪ Increased Home Buyer down payment assistance from \$14,999 to \$50,000	<ul style="list-style-type: none">▪ CoD Community Development



ASSESSMENT OF FAIR HOUSING PLAN & AFFIRMATIVELY FURTHERING FAIR HOUSING GOALS

Through Grant Programs, continue to work with nonprofit developers to increase the supply of affordable units throughout Denton.	<ul style="list-style-type: none"> Four (4) Households Assisted <p>Timeline: 2020-2022 ConPlan</p> <p>Metrics: (123 units)</p> <ul style="list-style-type: none"> Development Fee Grant Awarded \$31,014.81 to 11 Housing Projects 2020-21: 67 (47 Elderly/Disabled) <ul style="list-style-type: none"> 3 HAP, 32 MRP, 1 H4H, 8 DAHC, 30 Fair Oaks 2021-22: 47 (37 Elderly/Disabled) <ul style="list-style-type: none"> 1 HAP, 46 MRP 	<ul style="list-style-type: none"> CoD Community Development Home Repair & Home Buyer Assistance Programs Denton Affordable Housing Corporation Habitat for Humanity
Identify other Funding, Programs, Advocacy tools, and Data sources that can help reduce barriers to development of affordable housing.	<p>Timeline: 2020-2022 ConPlan</p> <p>Metric:</p> <ul style="list-style-type: none"> Increase Minor Repair Program assistance from \$10,000 to \$24,999 Increased Home Buyer down payment assistance from \$14,999 to \$50,000 Completed Denton Affordable Housing Assessment February 2, 2021 (ID 21-1844) City Council adopted Denton's Affordable Housing Strategic Toolkit on February 15, 2022 (ID 22-090). \$2,227,259.25 – CDBG \$1,430,904.92 – HOME \$956,080.685 – CDBG-CV \$2,422,842 – General Fund 	<ul style="list-style-type: none"> CoD Community Development Home Repair & Home Buyer Assistance Programs Denton Affordable Housing Corporation Habitat for Humanity Denton Housing Authority

2020-2027 Proposed Actions

Proposed Action(s)	Metrics, Milestones, and Timeline for Achievement	Responsible Program Participants
Coordinate with Denton County Transportation Authority (DCTA) to improve access to transit resources (stops, route locations, schedules, and covered bus	<p>Timeline: 2023-2027 ConPlan</p> <p>Metric:</p> <ul style="list-style-type: none"> City of Denton Representation on DCTA Board 	<ul style="list-style-type: none"> DCTA City of Denton (CoD) Other DCTA Member Cities.



ASSESSMENT OF FAIR HOUSING PLAN & AFFIRMATIVELY FURTHERING FAIR HOUSING GOALS

stops to provide shelter in inclement weather)	<ul style="list-style-type: none"> ▪ Participate in round table meetings with (DCTA) <ul style="list-style-type: none"> ○ Routes provided #, Hours, Stops, Miles ○ # of Covered Stops added. 	
Continuation of housing programs designed to ensure that affordable, accessible housing is available throughout Denton.	<p>Timeline: 2023-2027 ConPlan Metric:</p> <ul style="list-style-type: none"> ▪ # of Resolutions of Support 9% HTC program ▪ # of Resolutions of No Objection 4% HTC Program ▪ Formation of a City Public Facility Corporation ▪ City will allocate funding for Affordable Housing grants City's General Fund, CDBG, HOME, and other funding sources as available <ul style="list-style-type: none"> ○ # of Grants ○ \$ awarded ○ # or persons benefiting from assistance 	<ul style="list-style-type: none"> ▪ CoD Community Development Home Repair & Home Buyer Assistance Programs ▪ TDHCA HTC Program ▪ Denton Affordable Housing Corporation ▪ Habitat for Humanity Denton Housing Authority ▪ Denton Housing Authority ▪ Private Developers ▪
Provide public service funding the contribute to the Social Determinants of Health: Economic Stability, Neighborhood, Education, Food Security, Community, Safety, & Social, Health Care System to promote all areas of Denton to high opportunity areas.	<p>Timeline: 2023-2027 ConPlan Metric:</p> <ul style="list-style-type: none"> ▪ Mapping opportunity index <ul style="list-style-type: none"> ○ Increase # of high opportunity neighborhoods ▪ City will allocate funding for Public Service, Facility, and/or Infrastructure Grants funded by the City's General Fund, CDBG, HOME, and other funding sources as available. <ul style="list-style-type: none"> ○ # of Grants ○ \$ awarded ○ # or persons benefiting from assistance 	<ul style="list-style-type: none"> ▪ CoD Community Development Grants programs ▪ Nonprofit Agencies ▪ Housing Systems ▪ Educational Systems ▪ Health Care Systems ▪ Transportation Systems ▪ Banking and Finance Systems



ASSESSMENT OF FAIR HOUSING PLAN & AFFIRMATIVELY FURTHERING FAIR HOUSING GOALS

GOAL 2: 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 only by majority vote. 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 increasing, but the presence of large universities in the Denton market adds to the increase in the number of renters and ultimately a higher percentage of residents are cost-burdened (Denton AFH, 44).

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 a barrier to affordable housing development everywhere. Planning and Zoning processes, local preference for affordable housing, high land acquisition costs, lack of buildable land, cost of construction materials, and limited housing subsidy all impact the ability to increase the supply of affordable housing units.

- Contributing Factor(s)**
- 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 Issue(s)**
- R/ECAPS
 - Access to opportunity
 - Disproportionate housing needs
 - Publicly supported housing

2020-2022 Assessment of Past Goals and Actions

Proposed Action(s)	Metrics, Milestones, and Timeline for Achievement	Responsible Program Participants
Continue to provide a Housing Tax Credit Application in support of the development and preservation of affordable rental housing for low-income households.	<p>Timeline: 2020-2022 ConPlan</p> <p>Metric:</p> <ul style="list-style-type: none">▪ Resolution of Support for Seven (7) 9% HTC Application▪ Resolutions of No Objection for thirteen (13) 4% HTC applications	<ul style="list-style-type: none">▪ TDHCA▪ CoD City Council



ASSESSMENT OF FAIR HOUSING PLAN & AFFIRMATIVELY FURTHERING FAIR HOUSING GOALS

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.	<p>Timeline: 2020-2022 ConPlan</p> <p>Metric:</p> <ul style="list-style-type: none"> Completed Denton Affordable Housing Assessment February 2, 2021 (ID 21-1844) City Council adopted Denton's Affordable Housing Strategic Toolkit on February 15, 2022 (ID 22-090). \$124,949 General Fund 	CoD Community Services
Continuation of high performing housing programs designed to ensure that affordable, accessible housing is created and preserved in Denton.	<p>Timeline: 2020-2022 ConPlan</p> <p>Metric:</p> <ul style="list-style-type: none"> 2020-21: 67 (47 Elderly/Disabled) <ul style="list-style-type: none"> 3 HAP, 32 MRP, 1 H4H, 8 DAHC, 30 Fair Oaks 2021-22: 47 (37 Elderly/Disabled) <ul style="list-style-type: none"> 1 HAP, 46 MRP 	<ul style="list-style-type: none"> CoD Community Development Home Repair Assistance & Home Buyer Assistance Programs
Seek opportunities to collaborate with housing services 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.	<p>Timeline: 2020-2022 ConPlan</p> <p>Metric:</p> <p>As above</p>	<ul style="list-style-type: none"> CoD Community Development Home Repair Assistance & Home Buyer Assistance Programs Denton Affordable Housing Corporation Habitat for Humanity Denton Housing Authority Denton Housing Authority

2020-2027 Proposed Actions

Proposed Action(s)	Metrics, Milestones, and Timeline for Achievement	Responsible Program Participants
Provide support for the creation of and preservation of affordable rental housing. Support Developers requesting Housing Tax Credits (HTC) through the Texas Department of Housing and Community Affairs (TDHCA)	<p>Timeline: 2023-2027 ConPlan</p> <p>Metric:</p> <ul style="list-style-type: none"> # of Resolutions of Support 9% HTC program # of Resolutions of No Objection 4% HTC Program Formation of a City Public Facility Corporation (PFC) 	<ul style="list-style-type: none"> TDHCA HTC Program Private Developers Denton Affordable Housing Corporation Habitat for Humanity Denton Housing Authority Denton Housing Authority



ASSESSMENT OF FAIR HOUSING PLAN & AFFIRMATIVELY FURTHERING FAIR HOUSING GOALS

Implement activities ^{Figure 2} in support of the Denton Affordable Housing Toolkit Five (5) Strategies ^{Figure 1}	Timeline: 2023-2027 ConPlan Metric: <ul style="list-style-type: none">▪ 430 units per year (4,304 over 10 Years to 2030) ^{Figure 2}	<ul style="list-style-type: none">▪ COD<ul style="list-style-type: none">○ Community Services○ Development Services○ Development Code Review Committee○ Planning & Zoning Commission▪ Private Developers▪ Denton Affordable Housing Corporation▪ Habitat for Humanity Denton Housing Authority▪ Denton Housing Authority
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The AFH report highlights the importance of access to and supply of affordable housing *by 1) reducing regulatory requirements where possible and 2) offering incentives to develop affordable housing.*

Figure 1





ASSESSMENT OF FAIR HOUSING PLAN & AFFIRMATIVELY FURTHERING FAIR HOUSING GOALS

Toolkit Activities will further the fair housing plan goals to increase the supply. These include:

- Developing a Small Home Communities and ADU program to encourage a diversity of housing types affordable to all incomes;
- Utilizing existing incentives and sources of subsidy (e.g., repair programs, tax credits, and federal and state subsidies) more efficiently and creatively;
- Assessing the Development Code for updates and using current overlay process that allow more flexibility in developing diverse housing types in higher opportunity areas;
- Building the capacity of area non-profits to develop affordable housing;
- Creating a developer incentive package attracting new affordable developers to the area;
- Land banking vacant lots and underutilized buildings for affordable housing development;
- Innovations and collaboration in project financing to help fund affordable development;

Figure 2

STRATEGY 1	STRATEGY 2	STRATEGY 3	STRATEGY 4	STRATEGY 5
INFILL DEVELOPMENT	ZONING RELIEF, VARIANCE AND INCENTIVES	INCREASE CAPACITY & RESOURCES	PRESERVATION OF AFFORDABILITY	INCREASE ACCESS TO INFORMATION
1A. Develop Small Home Communities Program	2.A Create Affordable Housing Overlay District	3.A Nonprofit Capacity Building Grant	4.A Housing Trust Incentive Program	5.A Landlord/Tenant Eviction Prevention Program & Education Campaign
1.B Develop Accessory Dwelling Unit Program	2.B Create Marketing Materials and outreach to development community	3.B Developer Affordable Housing Incentive Package	4.B Landlord Rental Maintenance Grant	5.B Interactive mapping tool (GIS)
	2.C Staff training for implementing new programs	3.C Pre-development Financing Program	4.C Employee Homeownership Program Development	5.C Denton Housing Authority Landlord Education Program for Housing Choice Vouchers
		3.D Low-Income Homeownership Program with Denton Housing Authority	4.D Down Payment Assistance Program	
			4.E Land Banking	

While these activities will not fully meet future housing demand, the tools will further housing production by using a mix of resources and using incentive-based policies to encourage more diverse development. These comprehensive solutions will:

1. Leverage Underutilized Properties
2. Continually improve the building and zoning codes, and if needed revise the code – Updating areas of the code to make it easier to build and preserve different housing types
3. Create and expand tools - Incentivizing, Create new funding, Maximize existing Funding
4. Minimize Displacement – Preserve existing Housing
5. Increase Access through education and referral



ASSESSMENT OF FAIR HOUSING PLAN & AFFIRMATIVELY FURTHERING FAIR HOUSING GOALS

GOAL 3: Increase Supply of Accessible, Affordable Housing for Persons with Disabilities

Efforts to improve and expand existing affordable housing programs continue to be supported primarily by the City. The City of Denton has acted in accordance with its policies to improve affordable and special needs housing.

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 (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 Factor(s)**
- 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 Issue(s)**
- Accessibility and availability for people with disabilities

2020-2022 Assessment of Past Goals and Actions

Proposed Action(s)	Metrics, Milestones, and Timeline for Achievement	Responsible Program Participants
Monetary support from the City's general fund for staff working with Federal grant programs, including CDBG and HOME.	Timeline: 2020-2022 ConPlan Metric: <ul style="list-style-type: none">▪ Three (3) Staff	<ul style="list-style-type: none">▪ CoD Community Development Home Repair Assistance & Home Buyer Assistance Programs
Provision of HOME funds to the City's only Community Housing Development Organization (CHDO), the Denton Affordable Housing Corporation (DAHC). DAHC currently provides ninety-	Timeline: 2020-2022 ConPlan Metric: <ul style="list-style-type: none">▪ 2020-21: 8 units (Elderly/Disabled)	<ul style="list-style-type: none">▪ Denton Affordable Housing Corporation



ASSESSMENT OF FAIR HOUSING PLAN & AFFIRMATIVELY FURTHERING FAIR HOUSING GOALS

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 Fair Oaks Denton, a HUD-subsidized senior housing development.	Timeline: 2020-2022 ConPlan Metric: ▪ 2020-21: 30 (47 Elderly/Disabled)	▪ CoD Community Development ▪ Fair Oaks
Provision of City general funds to provide a Development Fee Grant program for nonprofit organizations that are developing affordable housing.	Timeline: 2020-2022 ConPlan Metric: ▪ Development Fee Grant Awarded \$31,014.81 to 11 Housing Projects	▪ Denton Affordable Housing Corporation ▪ Habitat for Humanity Denton Housing Authority ▪ Denton Housing Authority
Use of additional State funding to support accessibility home improvements for households with persons that have a disability.	Timeline: 2020-2022 ConPlan Metric: ▪ Not started	▪ TDHCA

2020-2027 Proposed Actions

Proposed Action(s)	Metrics, Milestones, and Timeline for Achievement	Responsible Program Participants
Provision of HOME funds for rental rehab of Denton Affordable Housing Corporation (DAHC) accessible units.	Timeline: 2023-2027 ConPlan Metric: ▪ # Accessible Rental Rehab Units	▪ Denton Affordable Housing Corporation



ASSESSMENT OF FAIR HOUSING PLAN & AFFIRMATIVELY FURTHERING FAIR HOUSING GOALS

GOAL 4: Make Investments in Targeted Neighborhoods to Improve Access to Opportunity

The distribution of private investments, both in the number of units funded and location of funded projects, greatly impacts the overall supply of affordable housing and access to high opportunity areas. 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 developers to secure funding for affordable housing projects can restrict the likelihood of mobility of low-income residents from low-opportunity areas to high-opportunity areas. One way to measure this is to evaluate the amount and types of financial investments present in communities from local banking institutions (Denton AFH, 70). Debt-to-Income Ratio is the number one reason for loan denials in all five race categories in Denton County (Denton AFH, 71).

- Contributing Factor(s)**
- Lack of public or private investments in specific neighborhoods, including services or amenities
 - Lack of revitalization strategies

- Fair Housing Issue(s)**
- Access to opportunity
 - Segregation
 - R/ECAPs

2020-2022 Assessment of Past Goals and Actions

Proposed Action(s)	Metrics, Milestones, and Timeline for Achievement	Responsible Program Participants
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 in high opportunity areas.	<p>Timeline: 2020-2022 ConPlan</p> <p>Metric:</p> <ul style="list-style-type: none">▪ Completed Denton Affordable Housing Assessment February 2, 2021 (ID 21-1844)▪ City Council adopted Denton's Affordable Housing Strategic Toolkit on February 15, 2022 (ID 22-090).▪ \$124,949 General Fund	<ul style="list-style-type: none">▪ CoD Community Services
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.	<p>Timeline: 2020-2022 ConPlan</p> <p>Metric:</p> <ul style="list-style-type: none">▪ Support and participate in Collective Impact Projects	<ul style="list-style-type: none">▪ COD Community Services▪ United Way of Denton County<ul style="list-style-type: none">○ DC Behavioral Health Leadership Team○ DC Homelessness Leadership Team○ DC Workforce Success Leadership Team



ASSESSMENT OF FAIR HOUSING PLAN & AFFIRMATIVELY FURTHERING FAIR HOUSING GOALS

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)	Timeline: 2020-2022 ConPlan Metric: <ul style="list-style-type: none"> ▪ City of Denton Representation on DCTA Board ▪ Participated in quarterly round table meetings with (DCTA) 	
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2020-2027 Proposed Actions

Proposed Action(s)	Metrics, Milestones, and Timeline for Achievement	Responsible Program Participants
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.	Timeline: 2023-2027 ConPlan Metric: <ul style="list-style-type: none"> ▪ Complete Small Area Plans to address challenges and preserve and enhance the character of distinct areas. 	<ul style="list-style-type: none"> ▪ COD Development Services <ul style="list-style-type: none"> ○ Development Code Review Committee ○ Planning & Zoning Commission ▪ COD Community Services
Coordinate with Denton County Transportation Authority (DCTA) to improve access to transit resources (stops, route locations, schedules, and covered bus stops to provide shelter in inclement weather)	Timeline: 2023-2027 ConPlan Metric: <ul style="list-style-type: none"> ▪ City of Denton Representation on DCTA Board ▪ Participate in round table meetings with (DCTA) <ul style="list-style-type: none"> ○ Routes provided #, Hours, Stops, Miles ○ # of Covered Stops added. 	<ul style="list-style-type: none"> ▪ DCTA ▪ City of Denton (CoD) ▪ Other DCTA Member Cities.
Implement activities ^{Figure 2} in support of the Denton Affordable Housing Toolkit Five (5) Strategies ^{Figure 1}	Timeline: 2023-2027 ConPlan Metric: <ul style="list-style-type: none"> ▪ 430 units per year (4,304 over 10 Years to 2030) ^{Figure 2} 	<ul style="list-style-type: none"> ▪ COD <ul style="list-style-type: none"> ○ Community Services ○ Development Services ○ Development Code Review Committee ○ Planning & Zoning Commission ▪ Private Developers ▪ Denton Affordable Housing Corporation ▪ Habitat for Humanity Denton Housing Authority ▪ Denton Housing Authority



ASSESSMENT OF FAIR HOUSING PLAN & AFFIRMATIVELY FURTHERING FAIR HOUSING GOALS

GOAL 5: 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 of the Denton AFH (Denton AFH, 225). The AFH found that the City of Denton's commitment to fair housing involves solutions that further fair housing in Denton (Denton AFH, 45).

Contributing Factor(s) ▪ Lack of awareness

Fair Housing Issue(s) ▪ Fair housing enforcement

2020-2022 Assessment of Past Goals and Actions

Proposed Action(s)	Metrics, Milestones, and Timeline for Achievement	Responsible Program Participants
Support training opportunities on the City's programs and Fair Housing for local real estate professionals, property owners, and managers.	Timeline: 2020-2022 ConPlan Metric: ▪ 5 Realtor/Lender Trainings	▪ CoD Community Development ▪ Relators ▪ Lenders
Provide support (letters, endorsements, financial, etc.) for local fair housing groups' education and/or local fair housing groups' fundraising efforts	Timeline: 2020-2022 ConPlan Metric: ▪ No Letters of Support requested. ▪ No Funding requested	▪ CoD Community Development ▪ Local fair housing groups
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.	Timeline: 2020-2022 ConPlan Metric: ▪ Not Started	▪ CoD Community Development ▪ Denton Housing Authority ▪ Texas Workforce Commission
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	Timeline: 2020-2022 ConPlan Metric: ▪ Completed Denton Affordable Housing Assessment February 2, 2021 (ID 21-1844) ▪ City Council adopted Denton's Affordable Housing Strategic	▪ CoD Community Services



ASSESSMENT OF FAIR HOUSING PLAN & AFFIRMATIVELY FURTHERING FAIR HOUSING GOALS

affordable housing and fair housing goals.	Toolkit on February 15, 2022 (ID 22-090) . <ul style="list-style-type: none">▪ \$124,949 General Fund	
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.	Timeline : 2020-2022 ConPlan Metric : <ul style="list-style-type: none">▪ HUD Training	<ul style="list-style-type: none">▪ HUD▪ TDHCA▪ Texas Workforce Commission

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

- Educational activities
 - A resource referral list is available on the Fair Housing page of the City's website.
 - 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.
- Fair Housing Complaints
 - Planned assistance to residents regarding the appropriate forms and how to file a complaint with the Dept. of Housing & Urban Development, Fair Housing Office;
 - Information regarding how to contact other local agencies that provide support for Fair Housing and Landlord Tenant relationships is also provided.
- Translation of program and legal documents into Spanish;
- 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."
- Development and maintenance of affordable housing;
 - Support of a local community housing development organization (CHDO)

NON-DISCRIMINATION ORDINANCE. On March 22, 2022, the Denton City Council approved the City's comprehensive non-discrimination ordinance. The [ordinance](#) took effect on July 20, 2022.

The non-discrimination ordinance prohibits discrimination in housing, employment, and public accommodations based on the following protected classes: race, color, national origin, age, religion, disability, sex, sexual orientation, and gender identity. The language in the ordinance generally mirrors language in federal and state non-discrimination laws.



ASSESSMENT OF FAIR HOUSING PLAN & AFFIRMATIVELY FURTHERING FAIR HOUSING GOALS

Assessment of Past Goals and Actions

NOTES ON FAIR HOUSING COMPLAINTS

During the span of the 2020-2022 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, complaint 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.

2020-2027 Proposed Actions

Proposed Action(s)	Metrics, Milestones, and Timeline for Achievement	Responsible Program Participants
Support training opportunities on the City's programs and Fair Housing for local real estate professionals, property owners, and managers.	Timeline: 2023-2027 ConPlan Metric: <ul style="list-style-type: none">▪ 5 Realtor/Lender Trainings	<ul style="list-style-type: none">▪ CoD Community Development▪ Relators▪ Lenders
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.	Timeline: 2023-2027 ConPlan Metric: <ul style="list-style-type: none">▪ HUD Training	<ul style="list-style-type: none">▪ HUD
Implement the City of Denton non-discrimination ordinance	Timeline: 2023-2027 ConPlan Metric: <ul style="list-style-type: none">▪ Education materials distributed▪ # of Fair Housing	<ul style="list-style-type: none">▪ City of Denton (CoD)



ASSESSMENT OF FAIR HOUSING PLAN & AFFIRMATIVELY FURTHERING FAIR HOUSING GOALS

GOAL 6: 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 AFH provided the average index² scores for races and ethnicities for both the overall population and population below the federal poverty level in Denton. (Denton AFH, 135). Ratings specific to residents with housing assistance by index and any disparities are summarized next.

- Contributing Factor(s)**
- 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 Issue(s)**
- R/ECAPS
 - Access to Opportunity
 - Disproportionate Housing Needs
 - Publicly Supported Housing

"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" (Denton AFH, 173).

2020-2022 Assessment of Past Goals and Actions

Proposed Action(s)	Metrics, Milestones, and Timeline for Achievement	Responsible Program Participants
Coordinate with transportation (DCTA) to improve access to transit resources (bus stops, route locations, and schedules, and covered bus stops to	<p>Timeline: 2020-2022 ConPlan</p> <p>Metric:</p> <ul style="list-style-type: none">▪ City of Denton Representation on DCTA Board	<ul style="list-style-type: none">▪ DCTA▪ City of Denton (CoD)▪ Other DCTA Member Cities.



ASSESSMENT OF FAIR HOUSING PLAN & AFFIRMATIVELY FURTHERING FAIR HOUSING GOALS

provide shelter in inclement weather)	<ul style="list-style-type: none"> Participated in quarterly round table meetings with (DCTA) 	
Continuation of high performing housing programs designed to ensure that affordable, accessible housing is created and preserved in Denton.	<p>Timeline: 2020-2022 ConPlan Metric:</p> <ul style="list-style-type: none"> 2020-21: 67 (47 Elderly/Disabled) <ul style="list-style-type: none"> 3 HAP, 32 MRP, 1 H4H, 8 DAHC, 30 Fair Oaks 2021-22: 47 (37 Elderly/Disabled) <ul style="list-style-type: none"> 1 HAP, 46 MRP 	<ul style="list-style-type: none"> CoD Community Development Home Repair Assistance & Home Buyer Assistance Programs
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.	<p>Timeline: 2020-2022 ConPlan Metric:</p> <ul style="list-style-type: none"> Grants in support of the Housing Crisis Response System to Make homelessness rare, brief, and nonrecurring \$703,450 annually in General Funds 	<ul style="list-style-type: none"> CoD Community Services United Way of Denton County <ul style="list-style-type: none"> DC Behavioral Health Leadership Team DC Homelessness Leadership Team DC Workforce Success Leadership Team
Provide public service funding for Housing Stability, Food Security, Health & Well-Being, Education, Economic Security, and Mobility.	<p>Timeline: 2020-2022 ConPlan Metric:</p> <p>Grants to (CAPER):</p> <ul style="list-style-type: none"> Combat Food Insecurity Increase availability and access to Health, Mental Health, and Behavioral Health Care. Improve Family Stability by improving safety, support, and opportunity, including access to affordable childcare Services for special needs populations (seniors, disabled, veterans, abused and neglected children, and victims of domestic violence) Make homelessness rare, brief, and nonrecurring 	<ul style="list-style-type: none"> CoD Community Development



ASSESSMENT OF FAIR HOUSING PLAN & AFFIRMATIVELY FURTHERING FAIR HOUSING GOALS

2020-2027 Proposed Actions

Proposed Action(s)	Metrics, Milestones, and Timeline for Achievement	Responsible Program Participants
Provide public service funding the contribute to the Social Determinants of Health: Economic Stability, Neighborhood, Education, Food Security, Community, Safety, & Social, Health Care System to promote all areas of Denton to high opportunity areas.	<p>Timeline: 2023-2027 ConPlan</p> <p>Metric:</p> <ul style="list-style-type: none"> ▪ Mapping opportunity index <ul style="list-style-type: none"> ○ Increase # of high opportunity neighborhoods ▪ City will allocate funding for Public Service, Facility, and/or Infrastructure Grants funded by the City's General Fund, CDBG, HOME, and other funding sources as available. <ul style="list-style-type: none"> ○ # of Grants ○ \$ awarded ○ # or persons benefiting from assistance 	<ul style="list-style-type: none"> ▪ CoD Community Development Grants programs ▪ Nonprofit Agencies ▪ Housing Systems ▪ Educational Systems ▪ Health Care Systems ▪ Transportation Systems ▪ Banking and Finance Systems
Improve the housing crisis response system programs, including street outreach, diversion and prevention, emergency and transitional short-term supportive housing, and permanent supportive housing to people experiencing or at-risk of homelessness.	<p>Timeline: 2023-2027 ConPlan</p> <p>Metric:</p> <ul style="list-style-type: none"> ▪ City will provide annual Grants funded by the City's General Fund, CDBG, HOME, and other funding sources as available. <ul style="list-style-type: none"> ○ # of Grants ○ \$ awarded ○ # or persons benefiting from assistance 	<ul style="list-style-type: none"> ▪ CoD Community Services ▪ United Way of Denton County <ul style="list-style-type: none"> ○ DC Behavioral Health Leadership Team ○ DC Homelessness Leadership Team ○ DC Workforce Success Leadership Team

²Indecies: Low Poverty, School Proficiency, Labor Market, Transit, Low Transportation Cost, Jobs Proximity, Environmental Health



ASSESSMENT OF FAIR HOUSING PLAN & AFFIRMATIVELY FURTHERING FAIR HOUSING GOALS

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 (Denton 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 (Denton 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 (Denton 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 (Denton 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 (Denton 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 (Denton AFH, 184).



ASSESSMENT OF FAIR HOUSING PLAN & AFFIRMATIVELY FURTHERING FAIR HOUSING GOALS

CONCLUSION

The Denton AFH identified six (6) goals for the City of Denton. This assessment examined those contributing factors and fair housing issues (Denton AFH, 232-234). The regional NTRHA 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 City's population.

The proposed actions 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 to support fair housing in all North Texas communities.



ASSESSMENT OF FAIR HOUSING PLAN & AFFIRMATIVELY FURTHERING FAIR HOUSING GOALS

CERTIFICATION



ASSESSMENT OF FAIR HOUSING PLAN & AFFIRMATIVELY FURTHERING FAIR HOUSING GOALS

FAIR HOUSING POSTER



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!



NFHA
National Fair Housing Alliance



A public service message from the U.S. Department of Housing and Urban Development in partnership with the National Fair Housing Alliance.



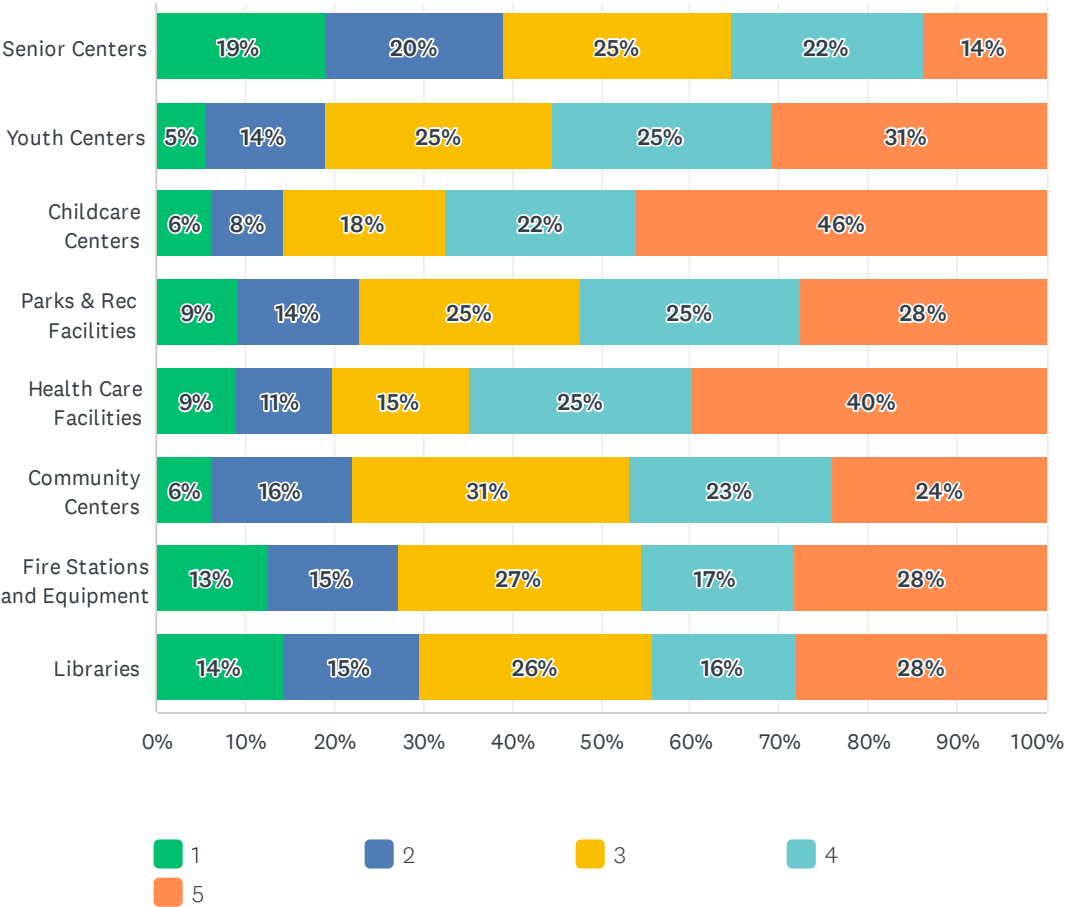
ASSESSMENT OF FAIR HOUSING PLAN & AFFIRMATIVELY FURTHERING FAIR HOUSING GOALS

APPENDIX 1

City of Denton AFH

Q1 Community Facilities

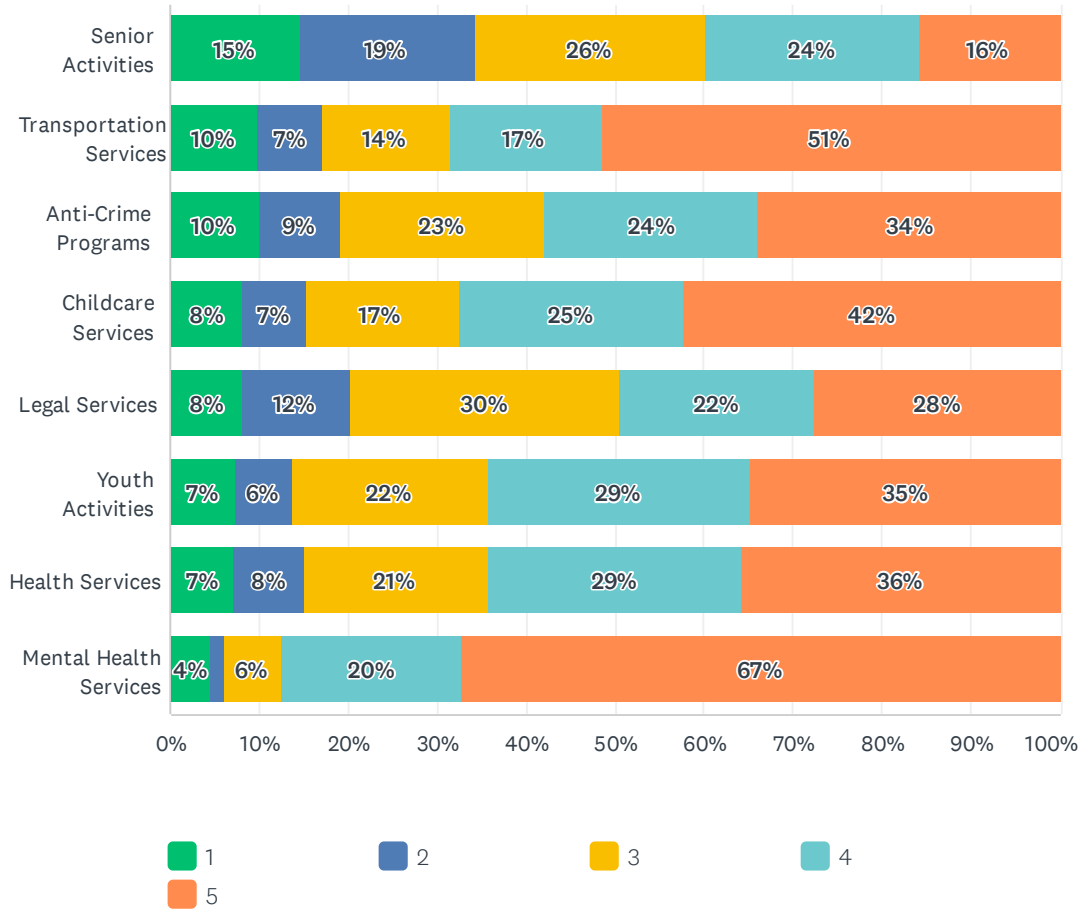
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	1	2	3	4	5	TOTAL
Senior Centers	19% 21	20% 22	25% 28	22% 24	14% 15	110
Youth Centers	5% 6	14% 15	25% 28	25% 27	31% 34	110
Childcare Centers	6% 7	8% 9	18% 20	22% 24	46% 51	111
Parks & Rec Facilities	9% 10	14% 15	25% 27	25% 27	28% 30	109
Health Care Facilities	9% 10	11% 12	15% 17	25% 28	40% 44	111
Community Centers	6% 7	16% 17	31% 34	23% 25	24% 26	109
Fire Stations and Equipment	13% 14	15% 16	27% 30	17% 19	28% 31	110
Libraries	14% 16	15% 17	26% 29	16% 18	28% 31	111

Q2 Community Services

Answered: 113 Skipped: 0

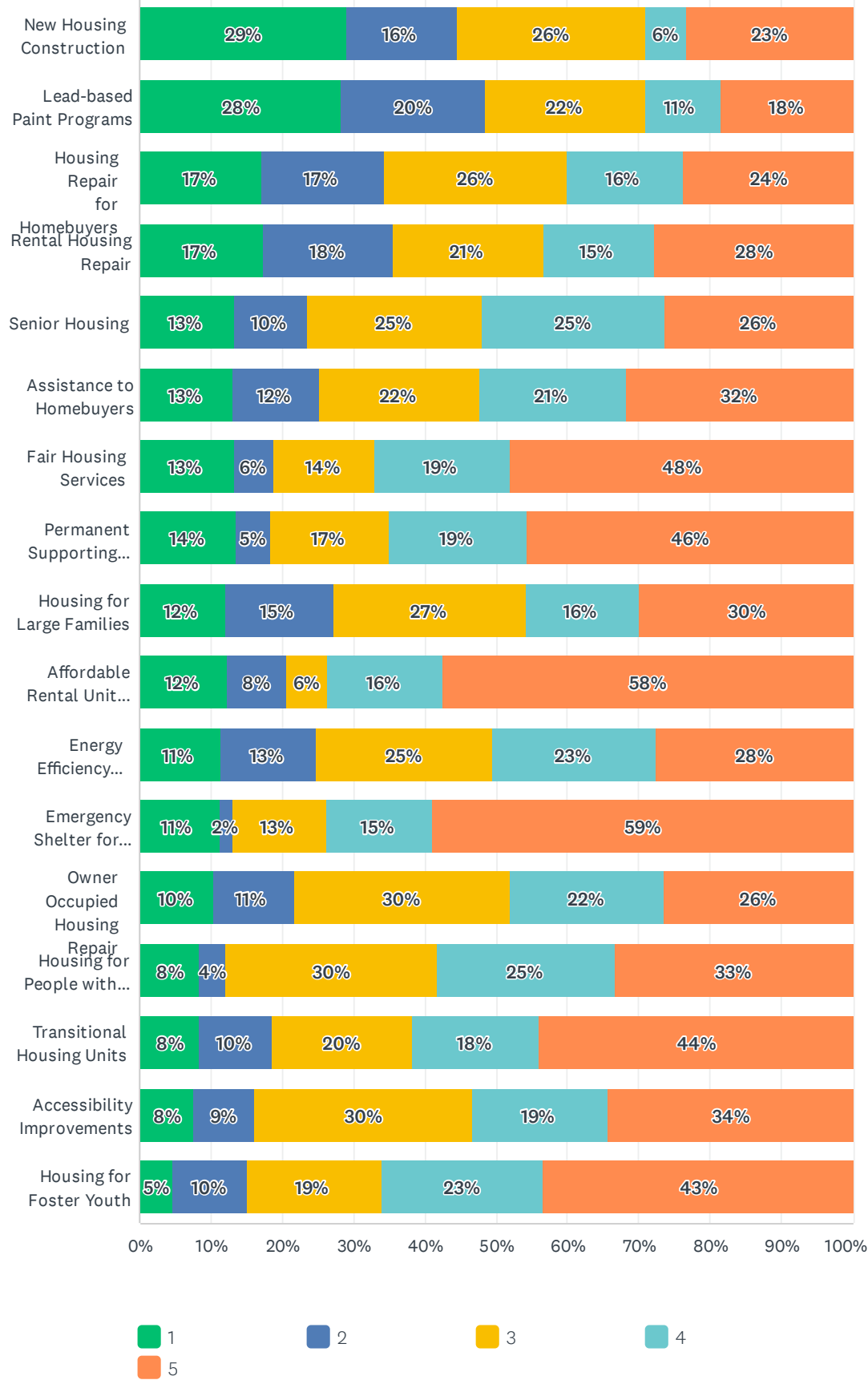


	1	2	3	4	5	TOTAL
Senior Activities	15% 16	19% 21	26% 28	24% 26	16% 17	108
Transportation Services	10% 11	7% 8	14% 16	17% 19	51% 57	111
Anti-Crime Programs	10% 11	9% 10	23% 25	24% 26	34% 37	109
Childcare Services	8% 9	7% 8	17% 19	25% 28	42% 47	111
Legal Services	8% 9	12% 13	30% 33	22% 24	28% 30	109
Youth Activities	7% 8	6% 7	22% 24	29% 32	35% 38	109
Health Services	7% 8	8% 9	21% 23	29% 32	36% 40	112
Mental Health Services	4% 5	2% 2	6% 7	20% 23	67% 76	113

Q3 Housing Assistance

Answered: 112 Skipped: 1

2023-2024 City of Denton Community Development Funding Priority Survey

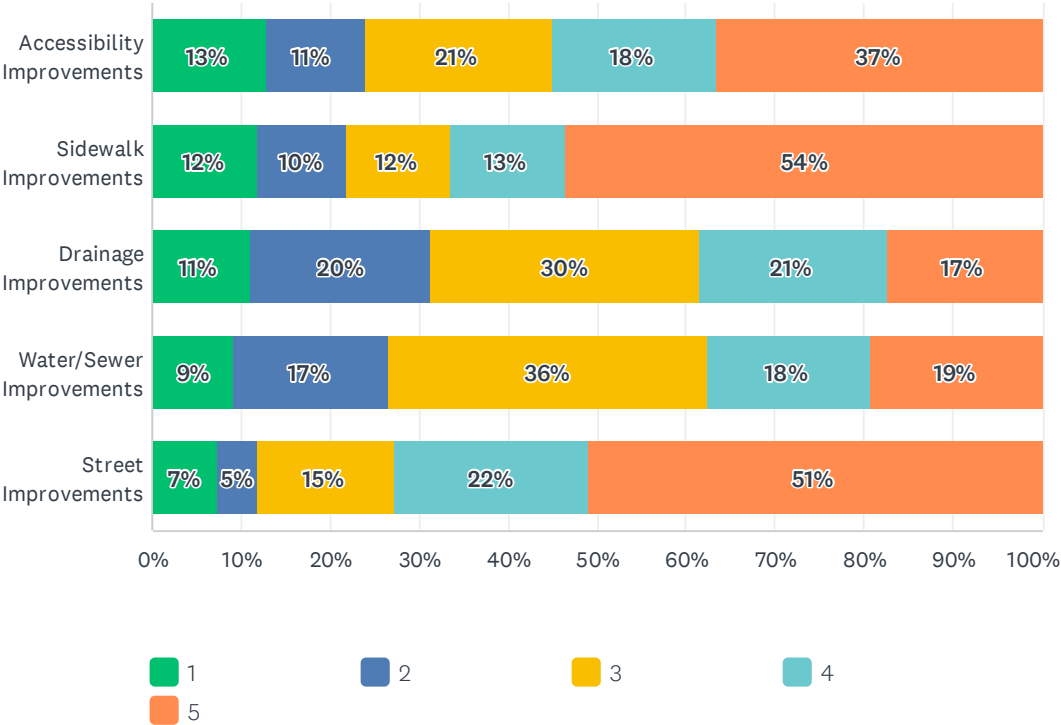


2023-2024 City of Denton Community Development Funding Priority Survey

	1	2	3	4	5	TOTAL
New Housing Construction	29% 30	16% 16	26% 27	6% 6	23% 24	103
Lead-based Paint Programs	28% 29	20% 21	22% 23	11% 11	18% 19	103
Housing Repair for Homebuyers	17% 18	17% 18	26% 27	16% 17	24% 25	105
Rental Housing Repair	17% 18	18% 19	21% 22	15% 16	28% 29	104
Senior Housing	13% 14	10% 11	25% 26	25% 27	26% 28	106
Assistance to Homebuyers	13% 14	12% 13	22% 24	21% 22	32% 34	107
Fair Housing Services	13% 14	6% 6	14% 15	19% 20	48% 51	106
Permanent Supporting Housing	14% 14	5% 5	17% 17	19% 20	46% 47	103
Housing for Large Families	12% 13	15% 16	27% 29	16% 17	30% 32	107
Affordable Rental Unit Construction	12% 13	8% 9	6% 6	16% 17	58% 61	106
Energy Efficiency Improvements	11% 12	13% 14	25% 26	23% 24	28% 29	105
Emergency Shelter for People Experiencing Homelessness	11% 12	2% 2	13% 14	15% 16	59% 63	107
Owner Occupied Housing Repair	10% 11	11% 12	30% 32	22% 23	26% 28	106
Housing for People with Disabilities	8% 9	4% 4	30% 32	25% 27	33% 36	108
Transitional Housing Units	8% 9	10% 11	20% 21	18% 19	44% 47	107
Accessibility Improvements	8% 8	9% 9	30% 32	19% 20	34% 36	105
Housing for Foster Youth	5% 5	10% 11	19% 20	23% 24	43% 46	106

Q4 Infrastructure

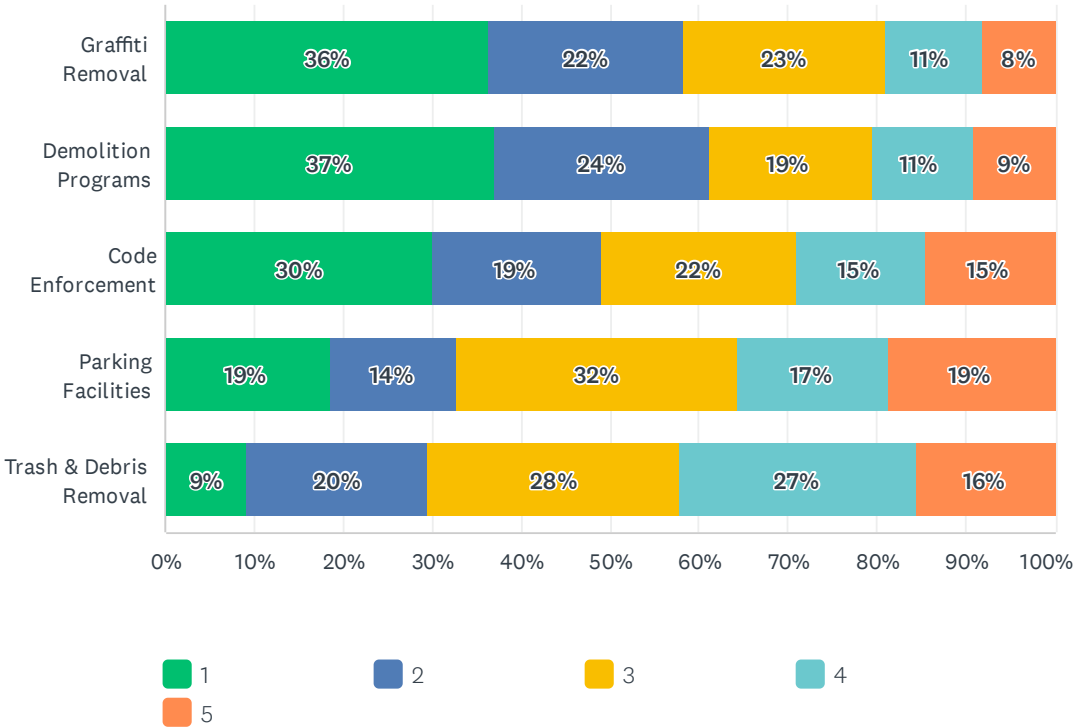
Answered: 111 Skipped: 2



	1	2	3	4	5	TOTAL
Accessibility Improvements	13% 14	11% 12	21% 23	18% 20	37% 40	109
Sidewalk Improvements	12% 13	10% 11	12% 13	13% 14	54% 59	110
Drainage Improvements	11% 12	20% 22	30% 33	21% 23	17% 19	109
Water/Sewer Improvements	9% 10	17% 19	36% 39	18% 20	19% 21	109
Street Improvements	7% 8	5% 5	15% 17	22% 24	51% 56	110

Q5 Neighborhood Services

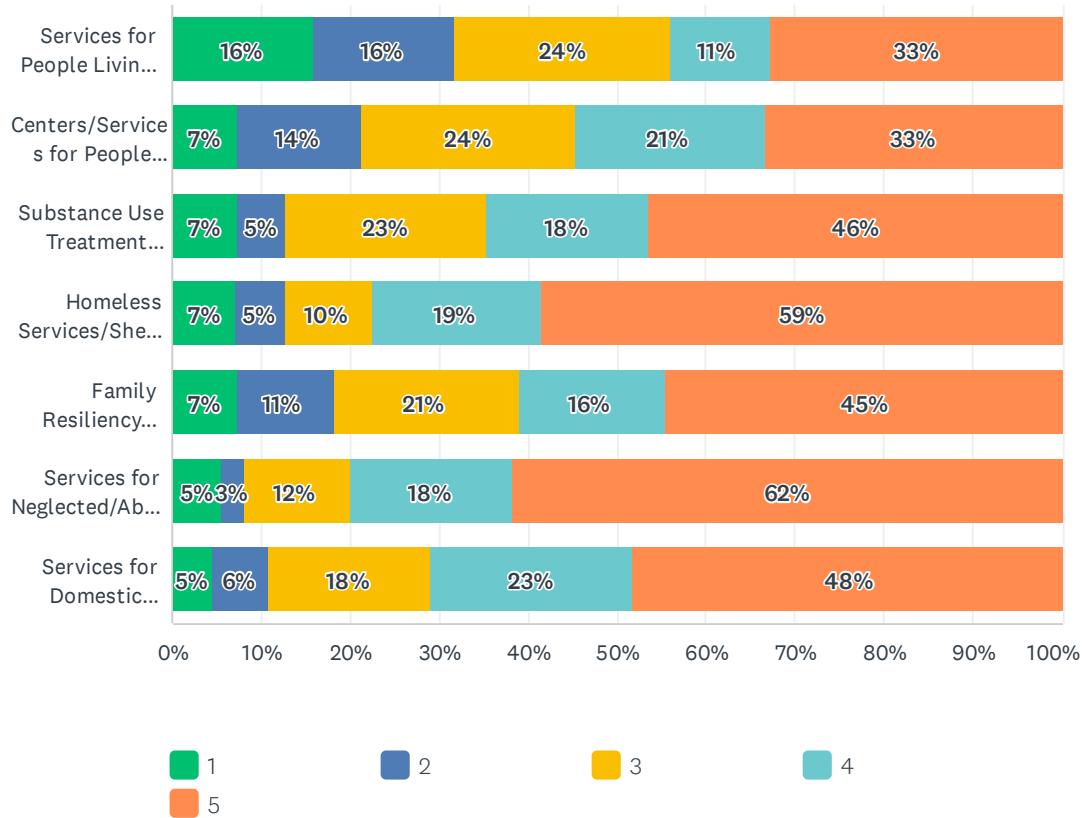
Answered: 111 Skipped: 2



	1	2	3	4	5	TOTAL
Graffiti Removal	36% 40	22% 24	23% 25	11% 12	8% 9	110
Demolition Programs	37% 40	24% 26	19% 20	11% 12	9% 10	108
Code Enforcement	30% 33	19% 21	22% 24	15% 16	15% 16	110
Parking Facilities	19% 20	14% 15	32% 34	17% 18	19% 20	107
Trash & Debris Removal	9% 10	20% 22	28% 31	27% 29	16% 17	109

Q6 Special Populations

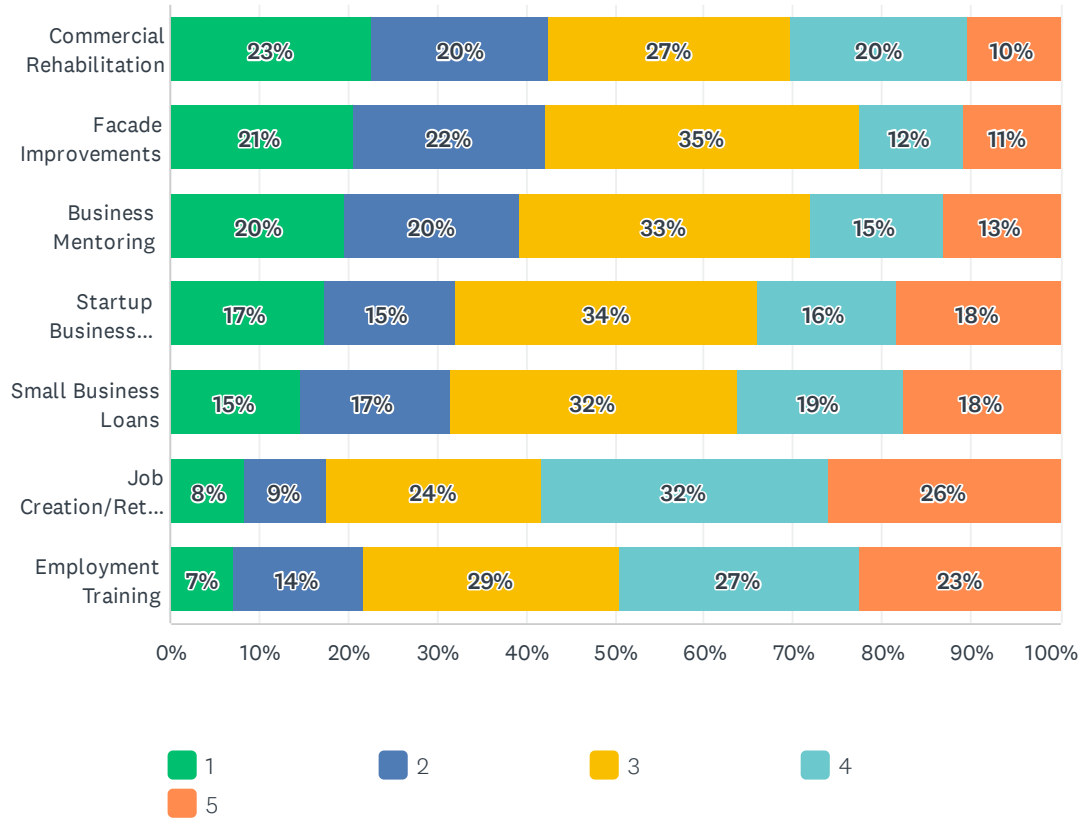
Answered: 113 Skipped: 0



	1	2	3	4	5	TOTAL
Services for People Living with HIV/AIDS	16% 17	16% 17	24% 26	11% 12	33% 35	107
Centers/Services for People with Disabilities	7% 8	14% 15	24% 26	21% 23	33% 36	108
Substance Use Treatment Services	7% 8	5% 6	23% 25	18% 20	46% 51	110
Homeless Services/Shelters	7% 8	5% 6	10% 11	19% 21	59% 65	111
Family Resiliency Services	7% 8	11% 12	21% 23	16% 18	45% 49	110
Services for Neglected/Abused Children	5% 6	3% 3	12% 13	18% 20	62% 68	110
Services for Domestic Violence/Sexual Assault Survivors	5% 5	6% 7	18% 20	23% 25	48% 53	110

Q7 Businesses & Jobs

Answered: 112 Skipped: 1



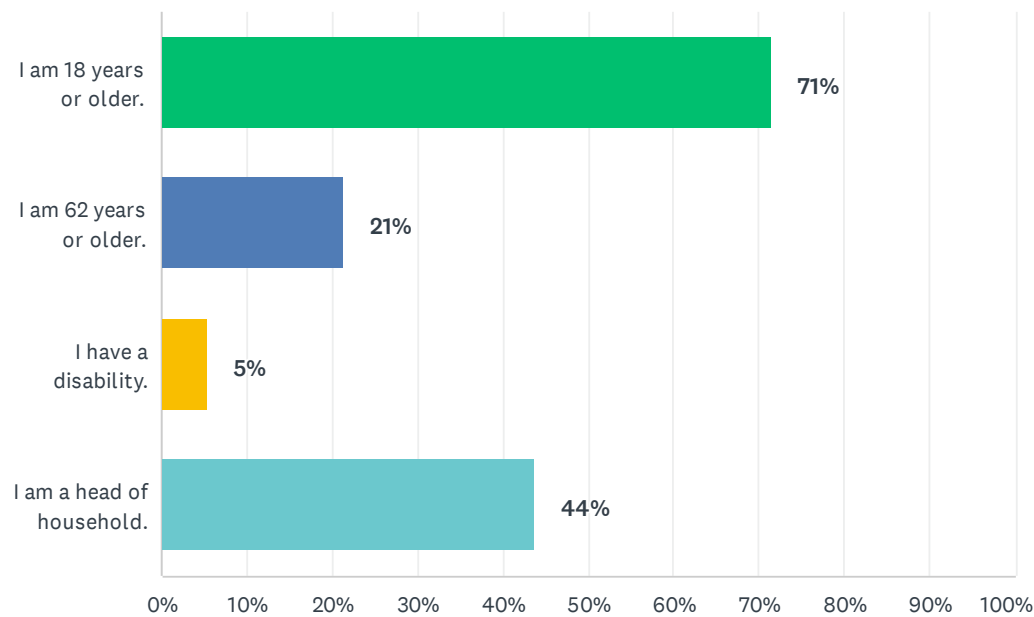
	1	2	3	4	5	TOTAL
Commercial Rehabilitation	23% 24	20% 21	27% 29	20% 21	10% 11	106
Facade Improvements	21% 21	22% 22	35% 36	12% 12	11% 11	102
Business Mentoring	20% 21	20% 21	33% 35	15% 16	13% 14	107
Startup Business Assistance	17% 19	15% 16	34% 37	16% 17	18% 20	109
Small Business Loans	15% 16	17% 18	32% 35	19% 20	18% 19	108
Job Creation/Retention	8% 9	9% 10	24% 26	32% 35	26% 28	108
Employment Training	7% 8	14% 16	29% 32	27% 30	23% 25	111

Q8 Other Community Needs

Answered: 60 Skipped: 53

Q9 Please tell us about yourself (Select all that apply)

Answered: 112 Skipped: 1



ANSWER CHOICES	RESPONSES	
I am 18 years or older.	71%	80
I am 62 years or older.	21%	24
I have a disability.	5%	6
I am a head of household.	44%	49
Total Respondents: 112		

Q10 What is your Zip Code of residence?

Answered: 111 Skipped: 2

Attachment 4

Housing Market Study

RESEARCH METHODOLOGY

- Analysis conducted according to 24 CFR 92.254(a)(iii)
- Objective: determine 95% of the median area purchase price for single family housing in the city of Denton
- Prices to be determined for single-family housing
- Single Family Housing defined in 24CFR92.2 means a one-to four-family residence, condominium unit, cooperative unit, combination of manufactured housing and lot, or manufactured housing lot.
- Insufficient data available for new construction; new construction and existing single-family home value are combined.
 - Sales data reflects nearly all one-family house sales in the city of Denton. Source: *Real Estate Center at Texas A&M University*.
- Sales over the requisite number of months
 - Volume is less than 250 per month
- Single Family & Condominium: Analysis over a 1-month reporting period, date range 3/1/2022-2/28/2023
- Sufficient number of recent housing sales. Refer to summary chart below.
- Property Data
 - City of Denton, Texas Compilation of Single Family Existing Real Estate Sales for a 12-Month Period March 2022 – February 2023
- Median Value for each housing type
 - The median sales price lists all prices in ascending or descending order and finds the midpoint – where half the homes sold for more, and half the homes sold for less.

City of Denton, Texas Compilation of Single Family Existing Real Estate Sales for a 12-Month Period March 2022 – February 2023

Unit Type	Data Range	Sales Volume	Median Sales Price	Median Price Based on 95%
Single Family – Existing & New	3/1/2022-2/28/2023	1712	\$395,000	\$375,250

Sales Volume for Single Family Existing Real Estate Units is less than 250 sales per month so three months' worth of sales data is required per HUD guidelines to establish a median sales price based on local data.

Average Median Sales price for Existing Construction is \$395,000 *Source data provided via – Texas REALTOR® Data Relevance Project, a partnership among the Texas Association of REALTORS® and local REALTOR® associations throughout the state. Analysis is provided through a research agreement with the Real Estate Center at Texas A&M University.