



Third Program Year Action Plan

The CPMP Third Annual Action Plan includes the CMP and Narrative Responses to Action Plan questions that CDBG, HOME, HOPWA, and ESG grantees must respond to each year in order to be compliant with the Consolidated Planning Regulations. The Executive Summary narratives are optional.

Narrative Responses

GENERAL

Executive Summary

The Executive Summary is required. Include the objectives and outcomes identified in the plan and an evaluation of past performance.

Program Year 3 Action Plan Executive Summary:

The City of Sugar Land will receive \$306,988 in Community Development Block Grant (CDBG) funds for Program Year 2011 (October 1, 2011 through September 30, 2012). During this program year, the City anticipates conducting the following activities:

- Rehabilitation of the Sugar Land Community Center, transforming it into a multipurpose Community/Senior Center; the projected outcome is to serve approximately 800 city-wide limited clientele senior citizens.
- Direct services to children who are victims of neglect and abuse (Child Advocates of Fort Bend); the projected outcome of this service will be to assist 40 Sugar Land residents.
- Literacy education (Literacy Council of Fort Bend County); the projected outcome of this service will be to provide educational training to 108 Sugar Land residents.
- Youth recreation and outreach for low- to moderate-income children and youth (Fort Bend Family YMCA); the projected outcome of this service will be to assist 25 Sugar Land residents.
- Home-delivered meals to the elderly and frail elderly (Fort Bend Seniors Meals on Wheels); the projected outcome of this service will be to provide meals to 13 Sugar Land seniors.
- Shelter and services to victims of domestic violence (Fort Bend County Women's Center); the projected outcome of this service will be to provide assistance to 34 Sugar Land residents.

- Minor housing rehabilitation for homes owned and occupied by low- to moderate-income households, particularly the elderly and disabled (Fort Bend CORPS); the projected outcome of the housing rehabilitation program is to assist 9 Sugar Land households.
- General program administration, including technical assistance to subrecipient and other non-profit agencies serving Sugar Land; the projected outcome of program administration is to provide cost effective and competent technical assistance for the City of Sugar Land.

Table 1— PY 2011 Community Development Activities

Matrix Code	Project	Description	Priority	Program Year 2011 Objectives	Program Year 2011 Funding	Target Date for Completion
Public Facilities and Improvements						
03A Senior Centers	Community/Senior Center	Rehabilitation of the Sugar Land Community Center, transforming it into a multipurpose Community/Senior Center	High	Approx. 800 City-wide limited clientele	\$128,937	September 2012
Public Services						
05N Abused & Neglected Children	Child Advocates of Ft. Bend	Counseling for abused and neglected children	Medium	40	\$7,848	September 2012
05H Employment Training	Literacy Council of Ft. Bend County	Adult literacy & ESL education	Medium	108	\$12,700	September 2012
05A Senior Services	Ft. Bend Seniors Meals on Wheels	Meals on Wheels services to homebound elderly	High	13	\$16,000	September 2012
05G Battered & Abused Women	Ft. Bend County Women's Center	Operation of shelter for battered & abused women	High	34	\$5,000	September 2012
05D Youth Services	Ft. Bend Family YMCA	Youth recreation and outreach for low to moderate income children	High	25	\$4,500	September 2012
Public Services Total				220	\$46,048	
Housing						
14A Single Family Rehab	Ft. Bend CORPS	Minor single family housing rehabilitation, including ADA compliance	High	9	\$76,747	September 2012
Administration						
21A Administration	CDBG Program Administration	Administrative costs associated with managing CDBG	High	N/A	\$55,256	N/A
Total PY 2011 Funds					\$306,988	

Past Performance

The City of Sugar Land aims to be a place where residents of all income levels and situations can enjoy all stages of their lives. Program Year (PY) 2011 will be the third year of the City's 5-Year Consolidated Plan which spans PY 2009 through PY 2013. During the 2009 Program Year, over 781 low to moderate income Sugar Land residents received services through the CDBG program, including the rehabilitation of 16 low and moderate income residential owner-occupied housing units.

The City's 2010 program year will conclude on September 30, 2011, and to date the City of Sugar Land has provided assistance to approximately 155 low- to moderate-income residents during the program year. Services provided to date during the 2010 program year include minor home repair and rehabilitation by the Fort Bend CORPS to 4 homes throughout Sugar Land. The Literacy Council of Fort Bend County has provided ESL and adult literacy services to 63 Sugar Land adults, and Fort Bend Seniors Meals on Wheels has provided home-delivered meals to 20 homebound seniors. Fort Bend County Women's Center has provided crisis intervention and shelter to 31 victims of domestic violence, and Child Advocates of Fort Bend has provided counseling and forensic interviewing services to 37 abused and neglected children. In addition, the design of Settlers Way Park is nearing completion and has a service area of approximately 492 low- to moderate-income individuals. The design and engineering for the rehabilitation of the Sugar Land Community Center, transforming it into a multipurpose Community/Senior Center, is also underway and has an anticipated service area of approximately 800 limited clientele individuals.

The City's policy is to review any complaints regarding barriers to affordable or fair housing to determine the cause of the complaint and to assure that no city policies or procedures are inadvertently causing any fair housing problems. Any complaint that reveals a City policy has created or may cause an impediment to be sustained will be reviewed, and action may be taken to ensure that this impediment will not limit fair housing choice. During the 2010 program year, the City of Sugar Land has received no civil rights or fair housing complaints.

General Questions

1. Describe the geographic areas of the jurisdiction (including areas of low income families and/or racial/minority concentration) in which assistance will be directed during the next year. Where appropriate, the jurisdiction should estimate the percentage of funds the jurisdiction plans to dedicate to target areas.

The geographic area covered by this Annual Action Plan is the City of Sugar Land, Texas, located in Fort Bend County to the southwest of the City of Houston. With a 2000 population of 63,328 and a 2010 estimated population of 101,835, Sugar Land is a fast-growing suburban community that operates as a self-contained economic center and is an integral part of the Houston Metropolitan area. While the Texas State Data Center shows a 2010 estimated population for Sugar Land of 101,835, the Census Bureau's *2007-2009 American Community Survey's 3-Year Estimates* gives a population of 80,438. The City of Sugar Land's official current population estimate is 84,511.

While Sugar Land follows the target-area rationale for the majority of its infrastructure projects, PY 2011 does not have a target area based, but rather, a need based rationale for services and projects. The City of Sugar Land requires its public service and housing rehabilitation providers to focus exclusively on low- to moderate-income (LMI) residents of Sugar Land, and the identified public facility project, while not in a target area, will only serve limited clientele senior citizens. As such, target areas are not exclusively served in Sugar Land's 2011 CDBG program; however, the City's desire is to serve the neediest of its citizens regardless of geography.

The map below details the low- to moderate-income CDBG Target Areas within the City of Sugar Land.

Figure 1: CDBG Target Areas

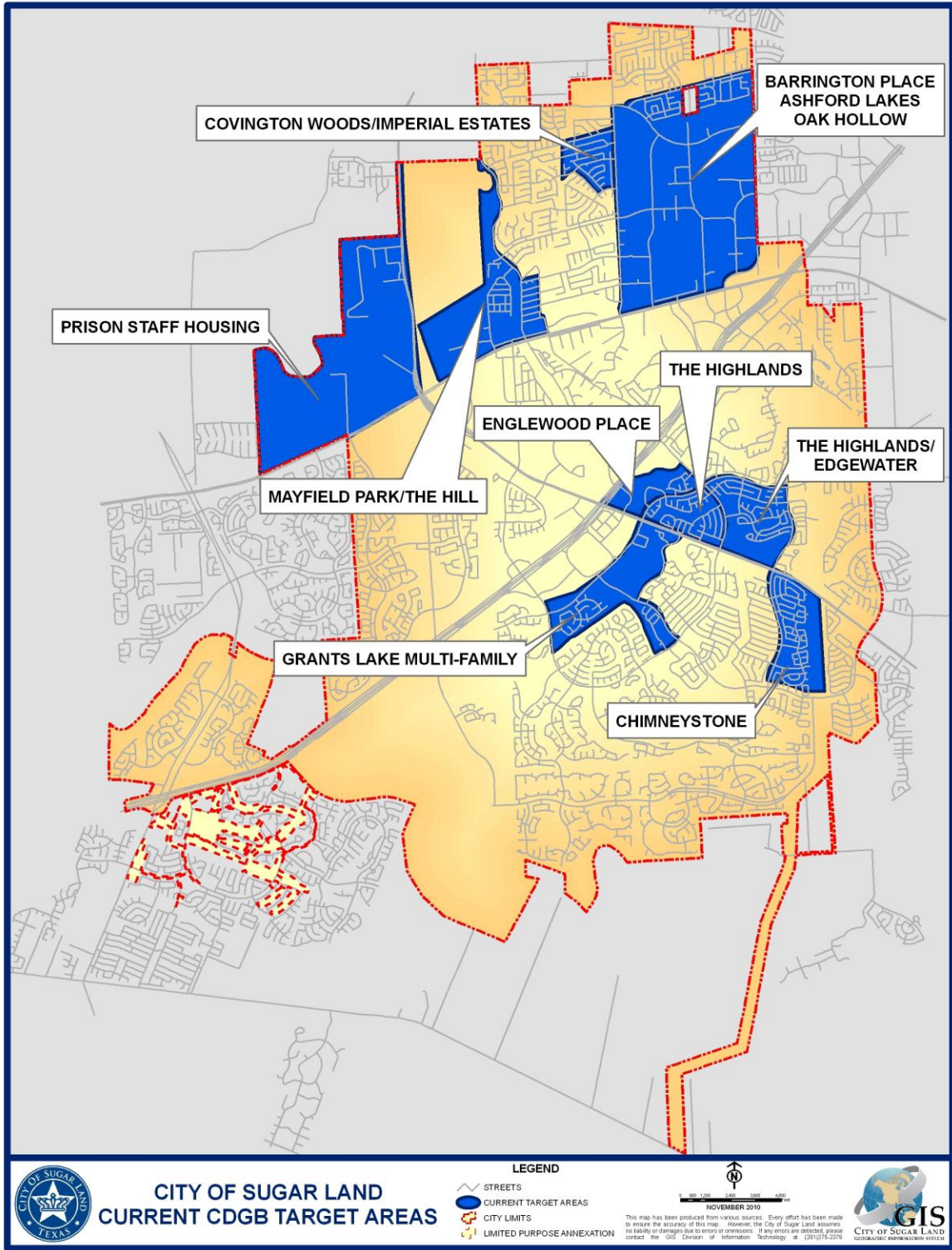


Table 2a—Target Area Population and Percent Low-Mod Income

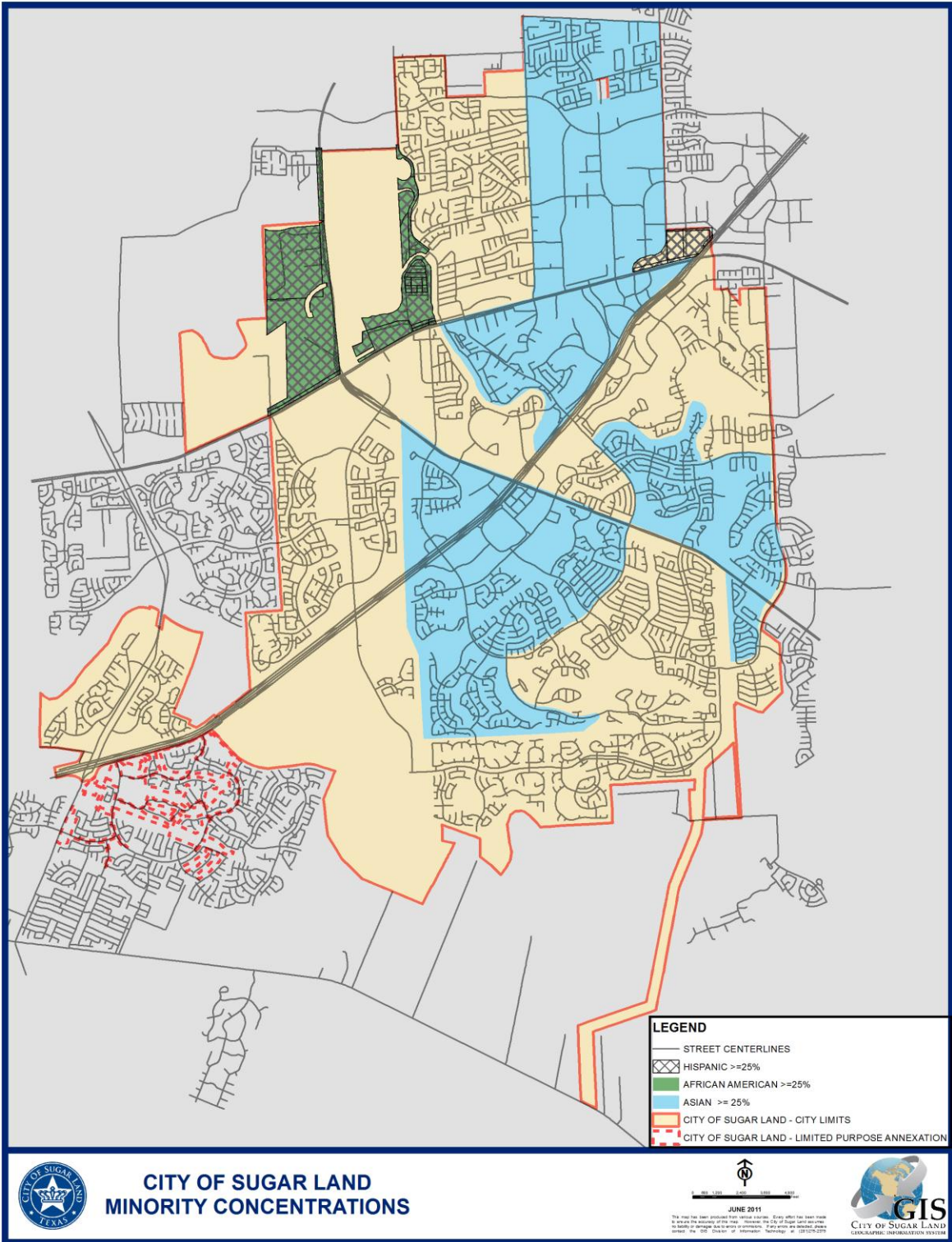
Census Tract-BG	Area Name	# Low-Mod	Total Population	% Low-Mod
672200-2	Mayfield Park/The Hill	582	930	62.6
671600-1	Englewood Place	521	1,546	33.7
672800-1	Prison Staff Housing	74	238	31.1
674000-2	Grants Lake Apartments	617	2,236	27.6
671600-5	The Highlands	513	1,872	27.4
671600-4	The Highlands/ Edgewater	550	2,452	22.4
672000-3	Barrington Place/Ashford Lakes/Oak Hollow	245	1,007	24.3
674100-3	Chimneystone	492	2,013	24.4
672300-2	Covington Woods/ Imperial Estates	264	1,177	22.4
Total		3,858	13,471	28.6

Table 2b—Target Area Minority Populations

Census Tract-BG	Area Name	Minority Population	Total Population	% Minority
672200-2	Mayfield Park/The Hill	272	930	29.2
671600-1	Englewood Place	515	1,546	33.3
672800-1	Prison Staff Housing	52	238	21.8
674000-2	Grants Lake Apartments	973	2,236	43.5
671600-5	The Highlands	585	1,872	31.3
671600-4	The Highlands/ Edgewater	1,088	2,452	44.4
672000-3	Barrington Place/Ashford Lakes/Oak Hollow	532	1,007	52.8
674100-3	Chimneystone	529	2,013	26.3
672300-2	Covington Woods/ Imperial Estates	61	1,177	22.4
Total		4,607	13,471	34.2

The City of Sugar Land does not base priority on ethnic/minority concentrations but rather overall need. From the map below, several minority concentrations can be identified throughout the City, and in comparing the City’s CDBG Target Areas and minority concentrations, some overlap is evident. For instance, Mayfield Park/The Hill is classified as an area with a minority concentration of 29.2% and is classified as a CDBG target area with the highest rate of low-moderate income individuals—62.6% - and the oldest housing stock. As a result, a majority of the housing rehabilitation activities are conducted in this area, but the projects are determined by need not racial/demographic data.

Figure 2: Minority Concentrations



Even though the City of Sugar Land contains multiple target areas and areas of minority concentrations, the geographic distribution of CDBG funding is primarily a city-wide benefit.

Table 3 – Geographic Distribution of PY 2011 Funding of \$306,988

Program Category	Geographic Area	Amount Allocated	Percent of Total
Public Services	City-wide	\$46,048.00	15%
Housing	City-wide	\$76,747.00	25%
Administration	City-wide	\$55,256.00	18%
*Public Facilities	City-wide	\$128,937.00	42%

*The Multipurpose Community/Senior Center is not located in a target area, but its sole purpose is to serve Limited Clientele Senior Citizens.

2. Describe the basis for allocating investments geographically within the jurisdiction (or within the EMSA for HOPWA) (91.215(a)(1)) during the next year and the rationale for assigning the priorities.

The City of Sugar Land generally locates its public facility and infrastructure projects within pre-determined target areas; however, public services and housing rehabilitation programs are not limited to geography. Rather, they are dictated by need. The City has additional requirements that 100% of those individuals receiving assistance through the CDBG program are low- to moderate-income individuals or limited clientele residents. Protected class populations consisting of: race, color, religion, sex, national origin, familial status and handicap are not discriminated against, and the protected classes of individuals that have received direct assistance from the City of Sugar Land’s CDBG program include women and their families, multiple racial groups, as well as handicapped elderly residents.

The City of Sugar Land has developed a two-pronged approach to allocating investments geographically: (1) respond to critical issues as they arise and (2) concentrate the bulk of the public facilities and infrastructure projects in a specific neighborhood over time until all priorities are met. The rationale for this target area approach is that by concentrating block grant funding in one target area at a time the target area will recover more quickly.

Though the focus is on one neighborhood at a time, the program is flexible enough to allocate or reallocate funds to address more urgent needs as they arise. While the PY 2010 public facilities project was not located in a target area, the design and engineering of improvements for the rehabilitation of the Sugar Land Community Center was identified as a priority for the program year in order to transform the facility into a multipurpose Community/Senior Center. With the completion of the design/engineering improvements, the rehabilitation phase of the project will begin during the 2011 program year. This public facility project will assist senior citizens, a limited clientele group throughout the City. While the facility is not located in a target area, it is a centrally located facility which is important for ease of access. The location selection for the new facility is due in part to the fact that the City owns the property thus eliminating the need for additional acquisition requirements and expense. In addition, most target areas within the City are located in residential neighborhoods with little or no vacant land which is necessary to construct a suitably sized facility.

Due to the age of housing and the average income of households in the target areas, most housing rehabilitation does take place in the various CDBG target areas, though it is not required. The housing rehabilitation program is based on household income, not area eligibility.

Public services are also administered throughout the City, and eligibility is income rather than area based.

3. Describe actions that will take place during the next year to address obstacles to meeting underserved needs.

The City has identified the need for a streamlined approach to public service agency participation. Throughout the next year, the City will continue to provide technical assistance to public service providers with the goal of creating efficiencies that will allow for less administrative burden which will ultimately permit more LMI residents to participate and be served under the City's CDBG program. With less energy and time being expended on administration, more money will be free for direct assistance to residents.

With the limited CDBG funds available and not being a HOME participating jurisdiction, the City of Sugar Land is not able to effectively address obstacles to meet underserved housing needs except as stated above. During the 2011 program year, 25 percent of the City's CDBG budget will be allocated to housing rehabilitation for low- to moderate-income homeowners, and 42 percent of the City's CDBG budget will be utilized to rehabilitate and dedicate a multi-purpose Senior Center for limited clientele senior citizens. The City will also allocate its entire 15 percent allowable award during PY 2011 to nonprofit public service agencies that assist the underserved in the City.

4. Identify the federal, state, and local resources expected to be made available to address the needs identified in the plan. Federal resources should include Section 8 funds made available to the jurisdiction, Low-Income Housing Tax Credits, and competitive McKinney-Vento Homeless Assistance Act funds expected to be available to address priority needs and specific objectives identified in the strategic plan.

The City will have approximately \$605,000 available in CDBG funds for PY 2011. These funds will be utilized to complete the above noted public facilities rehabilitation/construction as well as the housing rehabilitation and public service grants. Many of the public service providers have multiple funding sources from the United Way, the USDA, etc.

Table 4 –Additional Resources Provided by Funded Agencies

Agency	Source of Additional Resources	Projected Amount of Additional Resources
City of Sugar Land	General Fund & Bonds	\$600,000
Child Advocates of Fort Bend	Federal & State	\$4,652
Fort Bend CORPS	Private	\$70,000
Fort Bend County Women’s Center	Federal, State & Private	\$49,204
Fort Bend Family YMCA	Private	\$775,500
Fort Bend Seniors Meals on Wheels	Federal, State & Private	\$27,142
Literacy Council of Ft. Bend County	Private	\$36,052
Total		\$1,562,550

Managing the Process

1. Identify the lead agency, entity, and agencies responsible for administering programs covered by the consolidated plan.

The City of Sugar Land’s Community & Environmental Services Department is the lead agency responsible for administering the CDBG program that was enumerated in the Consolidated Plan. This department works closely with non-profit subrecipients who play an integral part in the successful completion of the program. These agencies include Child Advocates of Fort Bend, Literacy Council of Fort Bend County, Fort Bend Seniors Meals on Wheels, Fort Bend Family YMCA, Fort Bend County Women’s Center, and Fort Bend CORPS.

2. Identify the significant aspects of the process by which the plan was developed, and the agencies, groups, organizations, and others who participated in the process.

The City of Sugar Land identified its community needs and priorities within the 5-Year Consolidated Plan that spans PY 2009 through PY 2013. Annually, the City’s needs are assessed according to the priorities listed in the Consolidated Plan. City departments are responsible for identifying infrastructure and public facility needs, and according to city CDBG Policies and Procedures, public hearings are held each year during the development of the Annual Action Plan to give the public and public service providers a forum to discuss community needs and prospective projects for the upcoming year.

City staff also employs experienced CDBG consultants to discuss projects and maximize public benefits.

3. Describe actions that will take place during the next year to enhance coordination between public and private housing, health, and social service agencies.

The City of Sugar Land will continue to provide a forum for public and private agencies to interact and develop collaborative partnerships to share and serve the diverse citizenry. The City’s consultants will also continue to serve as an open ended resource for all public service providers to seek technical assistance and guidance.

Citizen Participation

1. Provide a summary of the citizen participation process.

The City of Sugar Land strives for full transparency and involvement of all of its citizens in the execution of its CDBG program. Sugar Land has a detailed Policy and Procedures process that provides for public comment throughout the year and several avenues to provide comment, from email to phone calls and face to face meetings.

The first public hearing regarding the development of the PY 2011 Annual Action Plan was held on Tuesday, April 5, 2011 at 10 a.m. at the City of Sugar Land City Hall (2700 Town Center Boulevard North) in order to garner information from attendees and provide a pre-application workshop for prospective applicant agencies for CDBG funding. The second public hearing was held on Monday, July 11, 2011 at 6 p.m. at the City of Sugar Land Community Center (226 Matlage Way) during the 30-day public comment period from June 27, 2011 through July 26, 2011. The public hearings gave residents and interested parties an opportunity to publicly voice their opinions of the plan or to have questions answered regarding the CDBG program and the proposed plan.

Both of the public hearings were advertised in the general-circulation newspaper, as well as at City Hall and on the City website. Copies of the advertisements have been included as attachments.

2. Provide a summary of citizen comments or views on the plan.

Public hearings were advertised and held concerning the CDBG program. The views and comments heard during the first public hearing came exclusively from non-profit service providers. These providers acted as the informal agents of the citizens they serve. No written comments were received in the first public hearing process, and service providers made few comments other than questions regarding funding. A second public hearing was held to discuss the Annual Action Plan in order to give citizens more opportunity to provide feedback on selected projects. The City of Sugar Land received no written or verbal comments regarding the proposed Annual Action Plan.

3. Provide a summary of efforts made to broaden public participation in the development of the consolidated plan, including outreach to minorities and non-English speaking persons, as well as persons with disabilities.

The City of Sugar Land continues to attempt to broaden public participation in the development of the Consolidated Plan and Annual Action Plans. The City also requested that each service agency attending the pre-application workshop encourage and assist their clients to contact the City with comments. The City works with the Literacy Council of Fort Bend County to notify and solicit input from residents with limited English proficiency. Agencies serving persons with disabilities are also encouraged to make clients aware of the CDBG program and plans and to assist clients in accessing, understanding and commenting on the Annual Action Plan during the 30-day comment period.

4. Provide a written explanation of comments not accepted and the reasons why these comments were not accepted.

The City of Sugar Land accepts and reviews all public comments and responds as needed. Currently, the City has received no public comments for the proposed PY 2011 CDBG program.

Program Year 3 Action Plan Citizen Participation response:

The City of Sugar Land is committed to promoting citizen participation. The City's CDBG Policies and Procedures address official complaints within 14 days of receipt, and the City will meet with the complainant in person if necessary to resolve the issue.

Institutional Structure

1. Describe actions that will take place during the next year to develop institutional structure.

Program Year 3 Action Plan Institutional Structure response:

The Community & Environmental Services Department of the City of Sugar Land began managing the CDBG program in PY 2008 and will continue to manage the program, with the assistance of contract consultants, in the foreseeable future. The contract consultants will continue to provide technical assistance to the Community & Environmental Manager in CDBG program matters. The Community & Environmental Manager also will attend local training provided by the Houston U.S. Department of Housing and Urban Development (HUD) office and will attempt to attend other HUD trainings and webcasts as needed. In working with the local HUD office to obtain technical assistance in drafting the City's annual plans and in reference to general programmatic questions, the City's partnership with HUD ensures that the longevity of the program is sustained throughout the implementation of the program.

Monitoring

1. Describe actions that will take place during the next year to monitor its housing and community development projects and ensure long-term compliance with program requirements and comprehensive planning requirements.

Program Year 3 Action Plan Monitoring response:

The City of Sugar Land's monitoring strategy is designed to assist staff in fulfilling its regulatory obligation in monitoring subrecipients, including city departments, as well as assist subrecipients in best serving their consumers and to meet the City's goals and objectives set forth in the Consolidated Plan. The primary purpose for this monitoring strategy is to ensure proper program performance, financial performance and regulatory compliance in accordance with HUD regulations. The secondary purpose is to ensure that the funded agencies are providing the best and most cost effective services possible and that they are positioned to access additional funding from non-HUD sources. In addition, a tertiary purpose is to ensure that the funded agencies are provided the best technical assistance possible to enhance their capacity and service delivery systems.

Monitoring provides a basis for assessing a program's operations and identifying problems. In addition, it allows the City to obtain ongoing data for use in determining program achievement. Evaluations will summarize monitoring findings and program goals, and they will measure the progress toward meeting those goals during the provision of services.

The Community & Environmental Services Department has the responsibility for overall CDBG performance and Annual Action Plan compliance, including the performance of its subrecipients. Clear record keeping requirements are essential for grant accountability. Responsibility for maintaining many of the records is assigned to the subrecipients and contracted city departments. This responsibility includes documenting activities with special requirements, such as necessary determinations, income certifications or written agreements with beneficiaries, where applicable.

The monitors make site visits to the activities or projects of each subrecipient or contracted city department. The monitoring process consists of the monitors examining time records, client files, financial records and CDBG-funded equipment or machinery. The monitors discuss security measures that a subrecipient or city department has in place to avoid theft of federally-funded purchases, if applicable. The monitors examine all CDBG-funded equipment or machinery for the City's identification number. This examination is done to ensure that any equipment or machinery purchased with CDBG funds is being used to meet a national objective and to ensure that any equipment purchased with CDBG funds through a subrecipient will be used to meet said objective.

At the beginning of each Program Year, the Community & Environmental Services Department and consultants meet with the subrecipients to provide reporting forms, discuss expectations and enter into a 12-month contract for services. Before the Community & Environmental Services Department and/or consultants conduct the actual monitoring visit, a pre-monitoring contact is made with the designated person(s) at the subrecipient agency or city department to discuss the overall expectations, information to be viewed and site visits. This initial contact allows staff and consultants to discuss solutions to possible problems that may have occurred from past experiences with a particular subrecipient or city department.

The procedure for conducting the monitoring consists of the following:

1. Prior to the actual award of contracts, the Community & Environmental Services Department and consultants hold a meeting at City Hall with the subrecipients. At that time, the monitoring procedures, reporting procedures and expectations are discussed and reporting forms are provided in electronic format.
2. If necessary, an additional one-on-one interview at the subrecipient's office is performed to further explain expectations.
3. At least once during the year, each subrecipient is notified of a date, time, place and information to be viewed and discussed during a monitoring visit.
4. At the beginning of the monitoring visit, a conference is held with a Board Member, Executive Director, Department Head and/or staff persons working with or salaried through the program or activity being funded.

5. The actual monitoring visit is conducted by viewing documentation such as random client files, financial records/audits, and if applicable, viewing rehabilitated sites, structures and the like. The monitor then completes the monitoring interview form that is maintained in the subrecipient's file at the City.

6. Monitoring visits conclude with the Community & Environmental Services Department or consultants advising the subrecipient of any deficiencies.

7. If no deficiencies are detected, a letter of compliance is sent to the subrecipient. When/if deficiencies or findings occur, a monitoring letter is transmitted to the subrecipient advising of the deficiencies, findings (which are violations of laws or regulations which can result in the deobligation of funds) or concerns (which could result in a finding if not properly corrected). The Community & Environmental Services Department and consultants then work with the subrecipient to assist in rectifying the deficiencies, concerns or findings.

During a monitoring visit, the monitors have the right to view any and all files that are related to a particular program or activity that is being funded with CDBG funds. Due to the sensitive nature of some of the public service programs, monitors may not have full access to personal data of those individuals being assisted; however, determinations as to the amount of access are made prior to the monitoring visit.

Monthly Beneficiary, Progress and Expenditure Reports for subrecipients are due on or before the 15th of each month. Continual delays in the submissions of these reports may affect this grant allocation and future allocations.

Copies of invoices, canceled checks, etc. are requested as documentation along with the Monthly Beneficiary, Progress and Expenditure Reports. Any subrecipient that expends \$500,000 or more in federal funds in one (1) year must have an independent audit performed which complies with the OMB Circular A-133 Single Audit Act.

For the first submission of the program year and any subsequent submissions when there have been staff changes, the subrecipient must submit an employee data report detailing the age, gender and race/ethnicity of staff members by job title. The Community & Environmental Services Department and/or consultants review each packet of information for completeness and accuracy, and no reimbursements are made until the packet of information meets city standards.

The Community & Environmental Services Department and contract consultants are responsible for monitoring all CDBG-funded infrastructure construction and rehabilitation activities. All such activities are monitored for Davis-Bacon Wage Rate compliance. Activities that provide any type of housing assistance are monitored for compliance with Fair Housing and Equal Opportunity (FHEO) laws. City staff and/or consultants also review projects for compliance with the Lead-Based Paint regulations, housing quality standards, city building codes and other rules, as appropriate. For infrastructure and other projects that fall under the regulations of the Davis-Bacon Act, the responsible city department works with the Community & Environmental Services Department and consultants to ensure that all applicable Equal Employment Opportunity (EEO) and Davis-Bacon posters are posted at the job site and employee interviews are conducted. The Fiscal Services Department maintains files with the bid documents and contracts for infrastructure/public facility projects, and the Community & Environmental Services Department maintains files

with the monitoring documentation, certified payrolls and employee interviews related to these projects. Upon completion of these projects, the responsible department provides copies of the final project approval to the Community & Environmental Services Department for the CDBG files.

The City of Sugar Land's CDBG program must meet all requirements set forth by the U.S. Department of Housing and Urban Development and the Office of Management and Budget. The City conducts an independent audit annually to ensure that CDBG funds are used in accordance with program requirements.

The monitoring strategy is designed to be an effective, productive and collaborative effort between the City's Community & Environmental Services Department, its consulting team and subrecipients or contractors of the CDBG program to assist them in efficiently providing the best services to low-moderate income residents of Sugar Land.

Lead-based Paint

1. Describe the actions that will take place during the next year to evaluate and reduce the number of housing units containing lead-based paint hazards in order to increase the inventory of lead-safe housing available to extremely low-income, low-income, and moderate-income families, and how the plan for the reduction of lead-based hazards is related to the extent of lead poisoning and hazards.

Program Year 3 Action Plan Lead-based Paint response:

The City of Sugar Land requires that every house scheduled for rehabilitation have a lead hazard screening. If the rehabilitation will disturb any exteriors or interiors that have paint, a lead-based paint test is performed. The housing rehabilitation subrecipient contracts with certified lead testers for all lead-based paint tests. If lead-based paint is found, the subrecipient contracts with certified contractors for all required remediation. In addition, the Fort Bend CORPS alerts residents of older housing of the lead-paint and other lead poisoning hazards and provides information regarding testing and remediation.

The City, through its contract with Fort Bend CORPS as a housing rehabilitation subrecipient, will continue to provide information to neighborhood organizations, applicants for rehabilitation work and interested residents regarding lead poisoning and hazards and how to identify problems, receive blood tests and access treatment.

HOUSING

Specific Housing Objectives

*Please also refer to the Housing Needs Table in the Needs.xls workbook.

1. Describe the priorities and specific objectives the jurisdiction hopes to achieve during the next year.

The City of Sugar Land places a high priority on the minor rehabilitation of owner-occupied homes in Sugar Land. To most efficiently and effectively carry out housing rehabilitation, the City contracts with the Fort Bend CORPS, a non-profit agency that blends CDBG funds with CenterPoint corporate funds for energy efficiency retrofits and private funds and volunteers to rehabilitate as many Sugar Land homes as possible. While all low- to moderate-income homeowners are eligible, the agency focuses on elderly and disabled homeowners.

The City of Sugar Land has a specific objective of rehabilitating at least 9 homes through its subrecipient housing agency, the Fort Bend CORPS, during PY 2011.

2. Describe how Federal, State, and local public and private sector resources that are reasonably expected to be available will be used to address identified needs for the period covered by this Action Plan.

Program Year 3 Action Plan Specific Objectives response:

The Fort Bend CORPS will expend \$76,747 in City of Sugar Land CDBG funds during the 2011 program year. With these funds, the Fort Bend CORPS will provide minor housing rehabilitation to 9 homes funded partially or wholly through its CDBG allocation. The minor rehabilitation will include any retrofits for making the homes accessible and safe for the disabled and frail elderly, interior and exterior repairs, energy efficiency retrofits and, where indicated, lead-based paint testing and amelioration.

Needs of Public Housing

1. Describe the manner in which the plan of the jurisdiction will help address the needs of public housing and activities it will undertake during the next year to encourage public housing residents to become more involved in management and participate in homeownership.
2. If the public housing agency is designated as "troubled" by HUD or otherwise is performing poorly, the jurisdiction shall describe the manner in which it will provide financial or other assistance in improving its operations to remove such designation during the next year.

Program Year 3 Action Plan Public Housing Strategy response:

There is no public housing agency that serves the City of Sugar Land.

Barriers to Affordable Housing

1. Describe the actions that will take place during the next year to remove barriers to affordable housing.

Program Year 3 Action Plan Barriers to Affordable Housing response:

In August 2009, the City of Sugar Land updated its Analysis of Impediments (AI) and Fair Housing Plan (FHP). Through this analysis, the City found that there were no policies that contributed to the concentration or prohibition of racial/ethnic minorities and no city building codes or ordinances that would limit the development or

improvement of affordable housing in Sugar Land. The City of Sugar Land continues to review its public policies to determine their impact on affordable housing, and the City's policy is to review any complaints regarding barriers to affordable or fair housing to determine the cause of the complaint and to assure that no city policies or procedures are inadvertently causing any fair housing problems. Any complaint that reveals a City policy has created or may cause an impediment to be sustained will be reviewed, and action may be taken to ensure that this impediment will not limit fair housing choice. In addition, the Community & Environmental Manager will act as the Fair Housing Officer who will be responsible for receiving complaints from the public and working with the appropriate city personnel to develop remedies to address unfair housing issues.

The City of Sugar Land has not identified any impediments for fair housing choice to protected classes of individuals; however, the City does recognize that economic impediments do exist that may limit housing choice. While the City does not have a voucher program, CDBG dollars are maximized for public services. These public service agencies, in particular Literacy Council of Fort Bend County and Fort Bend County Women's Center, provide educational opportunities as well as shelter and protective measures that allow for residents receiving assistance to increase their overall earning potential. During the 2011 program year, approximately 38%, \$17,700, of the public service funding will be utilized for Fair Housing Activities. The outcome measures for these services are identified in Table 1.

With the limited amount of CDBG funds awarded to the City of Sugar Land and the City not being a HOME Participating Jurisdiction, it was determined that CDBG housing funds should be used solely for owner-occupied rehabilitation. Using CDBG funds to conduct this rehabilitation, the City of Sugar Land will be utilizing approximately 25%, \$76,747, of its PY 2011 CDBG budget to conduct Fair Housing Activities for the rehabilitation of 9 owner-occupied homes. Due to the need in Sugar Land, as demonstrated by the demographics outlined in the Census data and by the applications to the Fort Bend CORPS for minor and moderate housing rehabilitation, the elderly have the greatest need of assistance. Due to their income and age, maintenance on their homes has been deferred over time and a greater number of houses occupied by elderly owners have rehabilitation and repair needs. By conducting rehabilitation activities, the economic burden is lessened for these property owners. Disabled home owners also have a high priority for minor housing rehabilitation. Small, large and other owner-occupied housing have no less of a need on an individual per-household basis; however, there are fewer households applying for CDBG assistance and a greater ability for the homeowner to make the repairs.

Through the funding of these two public service agencies and the housing rehabilitation efforts of the Fort Bend CORPS, the City is attempting to decrease the economic hardships faced by some residents, thus affirmatively furthering fair housing.

When reviewing each racial/ethnic group by percent with housing problems, the total households for a category is often very small, resulting in either a suppression of the data or a disproportionately high percentage. The table below details the percent of occupied units with housing problems by income and race/ethnicity of the householder.

Table 5 – Comparison of 2000 Housing Problems by Race/Ethnicity

Race/Ethnicity	Percent of Housing with Problems, Including Cost Burden					
	Income < 30% of Median		Income 30-50% of Median		Income 50-80% of Media	
	Renter	Owner	Renter	Owner	Renter	Owner
Anglo/White	65.7	89.2	76.1	84.9	82.3	70.1
African American	100 (35)*	63.6	83.3 (24)*	63.2	42.9	100 (29)*
Hispanic	53.8	70.6	100 (38)*	89.0	88.2 (34)*	58.2
Asian	65.9	94.5 (73)*	90 (100)*	79.7	94.5 (73)*	73.7

*Numbers in parentheses indicate total number of households for those with 100 or fewer units in the category biasing the percentages for comparison.

African Americans in Sugar Land for the most part do not have a disproportionately greater need than Anglos or other racial/ethnic groups. All of the very low-income African American renters and moderate-income owners have housing problems, which may be a cost burden only. However, the numbers in these categories are too small (35 and 29 respectively) to render valid comparisons with other racial/ethnic groups in Sugar Land. Likewise, Hispanics generally have a significantly lower percent of housing with housing problems than Anglos and others, except for those renters earning 30 to 50 percent or 50 to 80 percent of the median. However, there are only 38 and 34 households respectively in those categories skewing the comparisons with Anglos or other racial groups. Asians closely track Anglos except for low- and moderate-income renters, but as with the other minority groups, the small number of households in each category makes the comparison less valid.

Consequently, there is no marked disproportionate need among any of the racial/ethnic minorities across the board. While one group may have a significantly lower percent with housing problems for a tenure-by-income category, that same group may exceed the average for another category. The oldest neighborhood with the greatest need and lowest incomes is Mayfield Park. This neighborhood was constructed originally by the Imperial Sugar Company as housing for its laborers. As a result, the homes were originally purchased by lower-income, primarily minority, workers and have been passed down from generation to generation keeping it a predominately minority neighborhood with older, smaller homes that have some housing problems. Since a majority of the housing in Mayfield Park was inherited from parents or grandparents who had clear title, there have been no income qualifications required for purchase by the current owners, many of whom are very low-income and unable to maintain their homes. However, there does not appear to be any impediments to affordable housing based solely on race/ethnicity. Therefore, no civil rights violations have been reported to the City of Sugar Land.

HOME/ American Dream Down payment Initiative (ADDI)

1. Describe other forms of investment not described in § 92.205(b).
2. If the participating jurisdiction (PJ) will use HOME or ADDI funds for homebuyers, it must state the guidelines for resale or recapture, as required in § 92.254 of the HOME rule.

3. If the PJ will use HOME funds to refinance existing debt secured by multifamily housing that is that is being rehabilitated with HOME funds, it must state its refinancing guidelines required under § 92.206(b). The guidelines shall describe the conditions under which the PJ will refinance existing debt. At a minimum these guidelines must:
 - a. Demonstrate that rehabilitation is the primary eligible activity and ensure that this requirement is met by establishing a minimum level of rehabilitation per unit or a required ratio between rehabilitation and refinancing.
 - b. Require a review of management practices to demonstrate that disinvestments in the property has not occurred; that the long-term needs of the project can be met; and that the feasibility of serving the targeted population over an extended affordability period can be demonstrated.
 - c. State whether the new investment is being made to maintain current affordable units, create additional affordable units, or both.
 - d. Specify the required period of affordability, whether it is the minimum 15 years or longer.
 - e. Specify whether the investment of HOME funds may be jurisdiction-wide or limited to a specific geographic area, such as a neighborhood identified in a neighborhood revitalization strategy under 24 CFR 91.215(e)(2) or a Federally designated Empowerment Zone or Enterprise Community.
 - f. State that HOME funds cannot be used to refinance multifamily loans made or insured by any federal program, including CDBG.

4. If the PJ is going to receive American Dream Down payment Initiative (ADDI) funds, please complete the following narratives:
 - a. Describe the planned use of the ADDI funds.
 - b. Describe the PJ's plan for conducting targeted outreach to residents and tenants of public housing and manufactured housing and to other families assisted by public housing agencies, for the purposes of ensuring that the ADDI funds are used to provide down payment assistance for such residents, tenants, and families.
 - c. Describe the actions to be taken to ensure the suitability of families receiving ADDI funds to undertake and maintain homeownership, such as provision of housing counseling to homebuyers.

Program Year 3 Action Plan HOME/ADDI response:

The City of Sugar Land is not a HOME participating jurisdiction.

HOMELESS

Specific Homeless Prevention Elements

*Please also refer to the Homeless Needs Table in the Needs.xls workbook.

1. Sources of Funds—Identify the private and public resources that the jurisdiction expects to receive during the next year to address homeless needs and to prevent homelessness. These include the McKinney-Vento Homeless Assistance Act programs, other special federal, state and local and private funds targeted to homeless individuals and families with children, especially the chronically homeless, the HUD formula programs, and any publicly-owned land or property. Please describe, briefly, the jurisdiction’s plan for the investment and use of funds directed toward homelessness.

The City of Sugar Land does not expect to receive any funds during the next year to address homeless needs or to prevent homelessness. However, the Fort Bend County Women’s Center which serves victims of domestic violence from Fort Bend County, including Sugar Land, will be awarded \$5,000 in Sugar Land CDBG funds during PY 2011.

2. Homelessness—In a narrative, describe how the action plan will address the specific objectives of the Strategic Plan and, ultimately, the priority needs identified. Please also identify potential obstacles to completing these action steps.

In the PY 2009 – 2013 Consolidated Plan, the City of Sugar Land has placed a high priority on serving victims of domestic violence. During this Program Year, the City will provide \$5,000 in funding to the Fort Bend County Women’s Center to assist in the costs of operating their emergency shelter for victims of domestic violence, including Sugar Land residents. This shelter serves as a source that prevents temporary situations of homelessness.

There are no facilities in the City of Sugar Land or the remainder of Fort Bend County addressing the needs of the general homeless community; however, organizations do exist for sensitive populations and case by case assistance. Fort Bend Family Promise provides shelter in cooperation with participating host congregations: First Presbyterian, Christ United Methodist, Parkway United Methodist and St. Martin's Lutheran Church. These congregations are, on a rotating basis, serving approximately three to five families at any given time. Thoreau Unitarian Church is a supporting congregation that provides monetary support and volunteers to supplement the host congregations’ activities. Fort Bend Family Promise has not applied to the City for CDBG funds; however, the City is committed to providing them technical assistance to increase their capacity and ability to manage federal and state dollars.

The Fred and Mabel Parks Youth Ranch received its operating license and accepted its first adolescent resident on March 1, 2011. This facility provides shelter services for homeless youths throughout Fort Bend County and the City of Sugar Land. The organization has requested money from Fort Bend CDBG and has expressed interest in applying for Sugar Land CDBG funds in the future.

While the only obstacle in meeting the needs of victims of domestic violence is available funding, the primary obstacle in meeting the needs of the general homeless population is the availability and accessibility of services, shelters and housing. There is no local homeless coalition to be a conduit for Continuum of Care funds, and Sugar Land does not receive Emergency Shelter Grant funding. Fort Bend County, including Sugar Land, falls under the umbrella of the Coalition for the Homeless of Houston/Harris County, and the majority of the pro rata shares for Fort Bend County and Sugar Land are used by the Houston/Harris County agencies. The Fort Bend County Women's Center is the only agency within an accessible proximity to Sugar Land that receives any McKinney-Vento funding.

3. Chronic homelessness—The jurisdiction must describe the specific planned action steps it will take over the next year aimed at eliminating chronic homelessness by 2012. Again, please identify barriers to achieving this.

There is no agency serving the chronically homeless population in the City of Sugar Land, and the City does not receive Emergency Shelter Grant funding. Therefore, there are no action steps planned to address chronic homelessness. The lack of viable funding as well as housing and service providers presents the primary barrier to identifying and serving the general homeless population, including the chronic homeless individuals and families.

4. Homelessness Prevention—The jurisdiction must describe its planned action steps over the next year to address the individual and families with children at imminent risk of becoming homeless.

Currently, there are no agencies or programs to provide emergency assistance or tenant-based rental assistance to those facing homelessness in Sugar Land. If a need is presented, the City will make a concerted effort to identify and build capacity in an agency(ies) that can provide emergency utility, rental or mortgage assistance to prevent eviction and to provide longer-term tenant-based rental assistance.

5. Discharge Coordination Policy—Explain planned activities to implement a cohesive, community-wide Discharge Coordination Policy, and how, in the coming year, the community will move toward such a policy.

This is not applicable to Sugar Land. There are no shelter, transitional living, substance abuse residential treatment, mental health or other facilities in Sugar Land. Therefore, there is no discharge from a facility to homelessness or shelter that can be coordinated.

Program Year 3 Action Plan Special Needs response:

The City of Sugar Land recognizes the tragedy of homelessness and fully supports its public service providers with technical assistance in any cases where the possibility or reality of homelessness occurs.

Emergency Shelter Grants (ESG)

(States only) Describe the process for awarding grants to State recipients, and a description of how the allocation will be made available to units of local government.

Program Year 3 Action Plan ESG response:

This is not applicable for the City of Sugar Land.

COMMUNITY DEVELOPMENT

Community Development

*Please also refer to the Community Development Table in the Needs.xls workbook.

1. Identify the jurisdiction's priority non-housing community development needs eligible for assistance by CDBG eligibility category specified in the Community Development Needs Table (formerly Table 2B), public facilities, public improvements, public services and economic development.

Table 6—Community Development Needs

Matrix Code and Activity	Presumed Need (estimates)	Priority (H,M,L)
Target Area-Based Activities (Low-Mod Income Area)		
03 Public Facilities and Improvements (General)	Adequate	M
03D Youth Centers	1 needed	M
03F Parks, Recreational Facilities	150 acres of mini- and neighborhood parks; 9,500 linear feet of trails; 1 recreation center; Improvements to 6 parks in target areas	H
03I Flood Drain Improvements	~2,500 feet in target areas	H
03J Water/Sewer Improvements	~500 feet in target areas ; 2 lift stations in target areas or serving target areas	M
03K Street Improvements	~89,400 square feet in target areas; 8,500 new & retrofit street lights for energy efficiency	H
03L Sidewalks	~1,615 linear feet in target areas (replacement); ~9,500 linear feet in target areas (new)	H
03O Fire Stations/Equipment	Adequate	M
03P Health Facilities	Adequate	L
03R Asbestos Removal	privately managed	L
04 Clearance and Demolition	30+ sites	M
04A Clean-up of Contaminated Sites	30 sites	M
05I Crime Awareness	adequate	L
14E Commercial/Industrial Rehabilitation	10+ sites	L
15 Code Enforcement	250+ lots	M
16B Non-residential Historic Preservation	10+ sites	M
18A Economic Development Direct Assistance to For-Profits	4B Corporation to handle	L
18B Economic Development Technical Assistance	4B Corporation to handle	L
18C Micro-Enterprise Assistance	4B Corporation to handle	L

Low-Mod Income Clients or Households (any area)			
03A Senior Centers		improvements/expansion/1 more needed	H
03B Handicapped Centers		2 needed	M
03C Homeless Facilities		adequate	L
03M Child Care Centers		adequate	L
03Q Abused/Neglected Children Facilities		adequate	L
05 General Public Services		1,500+ low-mod income	M
05A Senior Services		2,250+ seniors	H
05B Handicapped Services		3,802 adults	M
05C Legal Services		250+ low-mod income	M
05D Youth Services		2,500+ youth	H
05E Transportation Services		764 individuals	H
05F Substance Abuse Services		1,900 individuals	M
05G Domestic Violence Services		110 families per year	H
05H Employment Training		2,300 adults	M
05J Fair Housing Activities		adequate	L
05K Tenant/Landlord Counseling		adequate	L
05L Child Care Services		1,000+ children	M
05M Health Services		15,840 adults + 5,684 children	M
05N Abused/Neglected Children Services		120 children	M
05O Mental Health Services		750 individuals	M
05P Lead Based Paint/Lead Hazard Screening		2,679 units	M
05R/13 Homeownership Assistance		3,351 w/ cost burden; 4,890 need homebuyer assistance	M
05S Rental Housing Subsidies		1,018 w/ cost burden	M
05T Security Deposits		750 households	L
06 Interim Assistance		2,030 households	M
12 Construction of Housing		434 owner occupied; 367 renter occupied	L
14A Single Family Housing Rehabilitation		4,299 units	H
14B Multi-family Housing Rehabilitation		584 units	M
14F Energy Efficiency Improvements		10,000+ units	H
14G Acquisition for Rehabilitation		< 100 units	L
14I Lead Based Paint Abatement		2,679 units	M
16A Residential Historic Preservation		< 100 units	M
19C Non-profit Capacity Building		10+ agencies	M
19D Assistance to Institutes of Higher Learning		1 community college; 1 upper division university	L
19E Operation and Repair of Foreclosed Properties		25 properties	L

- Identify specific long-term and short-term community development objectives (including economic development activities that create jobs), developed in accordance with the statutory goals described in section 24 CFR 91.1 and the primary objective of the CDBG program to provide decent housing and a suitable living environment and expand economic opportunities, principally for low- and moderate-income persons.

*Note: Each specific objective developed to address a priority need, must be identified by number and contain proposed accomplishments, the time period (i.e., one, two, three, or more years), and annual program year numeric goals the jurisdiction hopes to achieve in quantitative terms, or in other measurable terms as identified and defined by the jurisdiction.

Table 6 represents the specific long and short term community development objectives of the City of Sugar Land.

Program Year 3 Action Plan Community Development response:

The priority given to each category of the needs table is based on several factors:

- Level of available CDBG funding against program cost
- Location of need for area—based projects (within CDBG Target Area)
- Level of physical need described in City Comprehensive Plan and/or Parks Master Plan for public facilities and infrastructure
- Number of households or people in need based on Census, State and local data collected from a variety of sources
- Level of need described in applications for subrecipient funding and numbers served by subrecipients in the past
- Availability and capacity of agencies to address the need if funded
- Results of an on-line survey of needs, described in the Consolidated Plan

Antipoverty Strategy

1. Describe the actions that will take place during the next year to reduce the number of poverty level families.

Program Year 3 Action Plan Antipoverty Strategy response:

The City of Sugar Land uses CDBG dollars to assist public service agencies in providing services that enhance the employability of its clients. Using CDBG dollars, the City will fund the following activities:

English as a Second Language (ESL) and general literacy education for those with limited English proficiency or who are functionally illiterate. By increasing the literacy level of these residents, most of whom are very low- and moderate-income, the program is providing the necessary skills for accessing higher-paying jobs and improving their quality of life.

Education and job training for victims of domestic abuse. The Fort Bend County Women’s Center residents come to its shelter with virtually no resources or income, and through the supportive services provided, they are able to secure employment that will allow them to move into independent living. The Fort Bend County Women’s Center will serve 34 individuals in PY 2011 with City of Sugar Land CDBG funding.

The second approach to reducing poverty in Sugar Land is to reduce the cost of housing by providing rehabilitation assistance and reducing property taxes. Housing rehabilitation activities help ensure that the low- to moderate-income homeowners, particularly the elderly and disabled, are able to remain in their homes, reduce energy costs and preserve the value of their property. As the cost of living decreases, the amount of disposable income increases. The Fort Bend CORPS will use City of Sugar Land CDBG funds in PY 2011 to provide housing rehabilitation to 9 homes.

There are tax relief polices in effect which can help low-income homeowners retain their homes. Installment payments are available to residents over 65 years of age, and homeowners age 65 or older can “defer” or postpone paying property taxes on their home. However, the Property Tax Deferral only postpones the tax liability; property taxes are not cancelled.

The City's 4B Economic Development Corporation will continue to attract new employers to the City of Sugar Land. However, no CDBG funds will be used for this effort.

NON-HOMELESS SPECIAL NEEDS HOUSING

Non-homeless Special Needs (91.220 (c) and (e))

*Please also refer to the Non-homeless Special Needs Table in the Needs.xls workbook.

1. Describe the priorities and specific objectives the jurisdiction hopes to achieve for the period covered by the Action Plan.

While the City of Sugar Land does not limit its housing rehabilitation efforts to homes owned by the elderly or disabled, Fort Bend CORPS gives priority to these special needs households. Therefore, the majority of Fort Bend CORPS' housing rehabilitation efforts using CDBG funding will target low- to moderate-income elderly and disabled homeowners. Details regarding the housing rehabilitation program can be found above in the housing section of this Action Plan.

Through the allowable Public Services funding, the City of Sugar Land will provide \$16,000 to the Fort Bend Seniors Meals on Wheels program to provide hot, home-delivered meals to 13 elderly, disabled or frail elderly residents of Sugar Land. These meals will ensure proper nutrition for home-bound elderly that will result in fewer illnesses and hospitalization, as well as a longer, higher quality life.

Also, through the allowable Public Services funding, the City of Sugar Land will provide \$5,000 to the Fort Bend County Women's Center to support the programs for victims of domestic violence. These services will provide a safe haven, quality shelter, counseling, education and job training for those women escaping abusive situations.

2. Describe how Federal, State, and local public and private sector resources that are reasonably expected to be available will be used to address identified needs for the period covered by this Action Plan.

Program Year 3 Action Plan Specific Objectives response:

The City anticipates additional funding sources to continue to contribute money to its many service providers during PY 2011. These funds have included local and private contributions in the past. (See Table 4)

Housing Opportunities for People with AIDS

*Please also refer to the HOPWA Table in the Needs.xls workbook.

1. Provide a Brief description of the organization, the area of service, the name of the program contacts, and a broad overview of the range/ type of housing activities to be done during the next year.
2. Report on the actions taken during the year that addressed the special needs of

persons who are not homeless but require supportive housing, and assistance for persons who are homeless.

3. Evaluate the progress in meeting its specific objective of providing affordable housing, including a comparison of actual outputs and outcomes to proposed goals and progress made on the other planned actions indicated in the strategic and action plans. The evaluation can address any related program adjustments or future plans.
4. Report on annual HOPWA output goals for the number of households assisted during the year in: (1) short-term rent, mortgage and utility payments to avoid homelessness; (2) rental assistance programs; and (3) in housing facilities, such as community residences and SRO dwellings, where funds are used to develop and/or operate these facilities. Include any assessment of client outcomes for achieving housing stability, reduced risks of homelessness and improved access to care.
5. Report on the use of committed leveraging from other public and private resources that helped to address needs identified in the plan.
6. Provide an analysis of the extent to which HOPWA funds were distributed among different categories of housing needs consistent with the geographic distribution plans identified in its approved Consolidated Plan.
7. Describe any barriers (including non-regulatory) encountered, actions in response to barriers, and recommendations for program improvement.
8. Please describe the expected trends facing the community in meeting the needs of persons living with HIV/AIDS and provide additional information regarding the administration of services to people with HIV/AIDS.
9. Please note any evaluations, studies or other assessments that will be conducted on the local HOPWA program during the next year.

Program Year 3 Action Plan HOPWA response:

The City of Sugar Land receives no HOPWA funds.

Specific HOPWA Objectives

Describe how Federal, State, and local public and private sector resources that are reasonably expected to be available will be used to address identified needs for the period covered by the Action Plan.

Program Year 3 Specific HOPWA Objectives response:

Not applicable; the City of Sugar Land receives no HOPWA funds.

Other Narrative

Include any Action Plan information that was not covered by a narrative in any other section.

ATTACHMENTS:

Copy of Public Notices
Table 3A
Table 3C