



PY 2025 - PY2029 5-Year Consolidated Plan
Including the PY 2025 Annual Action Plan for the
U.S. Department of Housing and Urban Development's
Community Development Block Grant Program

Prepared by

City of Marshall, Texas

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Executive Summary

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

1. Introduction

The City of Marshall, Texas, receives annual funding from the U.S. Department of Housing and Urban Development through the Community Development Block Grant Program (CDBG) to assist low-income individuals, households, and neighborhoods. To qualify for these funds, the City must develop a 5-Year Consolidated Plan that outlines community needs and establishes priorities for utilizing CDBG funds. The City's needs, market conditions, goals, objectives, and outcomes for the CDBG Program are structured within a flexible adaptation of the PESTLE model to enhance the quality of life for individuals and neighborhoods that are predominantly low- to moderate-income and may be experiencing deterioration. The PESTLE model is a framework for analyzing the political, economic, social, technological, legal, and environmental factors that describe and influence the form and condition of a community. Activities funded by the CDBG program are selected based on the level of need and the capacity to assist those in greatest need, all within the constraints of the funding awarded to the City of Marshall.

The activities planned for the next five years are guided by the results of the resident survey, windshield surveys of low-income areas, the CDBG team's understanding of community needs, and the capabilities and priorities of local agencies to address these needs. Key initiatives include enhancing housing quality, upgrading public facilities such as parks and community centers, improving infrastructure as needs arise, and addressing the needs of both housed and unhoused marginalized populations through grants to public service agencies, special needs housing, and shelters.

Decent Housing: The City will continue its program to rehabilitate homes owned and occupied by low- to moderate-income households. The demand for new affordable housing is significant. Although directly addressing this need exceeds the scope of Community Development Block Grant (CDBG) funding, the City will collaborate with others to identify potential funding sources and lots for new homeownership construction. Furthermore, the City will strengthen its partnerships with the Marshall Housing Authority and organizations dedicated to assisting the homeless to secure housing for those without shelter, including individuals being discharged from group quarters. Additionally, the City will review all applications for Low-Income Housing Tax Credits (LIHTC) and other housing-related projects funded outside of CDBG.

Homeless and Special Needs Activities: During PY 2023 and 2024, the CDBG team has made significant progress in identifying and addressing the needs of unhoused individuals and special needs populations in Marshall. A comprehensive homeless services plan is currently in

development, and once finalized, the CDBG program will assist in providing social services, shelter, and support for accessing permanent housing. The CDBG team, along with agencies serving homeless and at-risk populations, will collaborate with the North East Texas Homeless Consortium and the Texas Homeless Network to establish a local system of care for both sheltered and unsheltered individuals experiencing homelessness. Given the size of Marshall and its unhoused population, it is feasible to engage with these individuals regularly to identify and address their specific needs.

The City is dedicated to supporting agencies that address the needs of the Special Needs populations, including seniors, individuals with disabilities, veterans, those struggling with substance use or mental health disorders, youth transitioning out of foster care, and victims of domestic violence.

Non-housing Community Development: Marshall plans to partially or fully fund various activities aimed at enhancing the community by improving residents' living conditions through: (1) the enhancement of public facilities and infrastructure; (2) code enforcement activities; (3) youth services; (4) initiatives to mitigate the effects of food deserts; (5) adult literacy education; (6) recreational activities for all ages; (7) senior services; and (8) other social service needs that may arise from annual applications submitted by nonprofit organizations.

In the past, Marshall has provided support to micro-enterprises and small businesses. Currently, funds are not available to continue these programs. However, over the next five years, if demand and funding increase, the CDBG team will evaluate the feasibility of offering assistance to businesses in need.

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

The objectives and outcomes for the next five years are tailored to each activity and involve the cultivation of collaborations between the CDBG team, potential grant applicants, and potential outside funders.

Decent Housing: The objective of decent housing is to facilitate the provision of sound, affordable housing for homeowners in Marshall. The expected outcomes include rehabilitated homes, a strategic plan and identified mechanisms to replace substandard and dilapidated housing with new affordable options, the review and approval of viable Low-Income Housing Tax Credit (LIHTC) applications, and the establishment of permanent supportive housing for special needs groups, particularly youth exiting foster care and adults with substance use disorders.

Marshall does not receive HOME funding. However, if in-fill lots and funds become available to the City through the State of Texas HOME program, the City will strive to provide abandoned lots to developers, State Community Housing Development Organizations (CHDOs), or other builders of affordable housing, such as Habitat for Humanity or similar entities.

Activities Addressing Homeless and Special Needs Populations: The recognition of the needs of homeless individuals has gained prominence in Marshall, and the CDBG team is diligently working to identify the unhoused population and the resources available to address their challenges. One objective is to ascertain the demographics and locations of homeless individuals, foster relationships with them, and provide immediate assistance, including food, clothing, identification cards, and transportation within Marshall and to shelters in neighboring communities. Concurrently, the CDBG team is working to identify existing shelters and former shelters that can be renovated and reopened. Technical assistance will be provided to agencies eligible to apply for State of Texas Emergency Solutions Grants and Continuum of Care funding to assist those seeking shelter or supportive housing.

Non-Housing Community Development: Social services aim to empower individuals through literacy education, job training, after-school programs, in-school counseling, rental assistance, transportation, and food support. The CDBG team will continue to identify eligible agencies that address the needs of low-income populations and to foster collaborative relationships, which may include providing funding and technical assistance.

Enhancing the physical environment is another key objective for Marshall and the CDBG team. Over the next one to two years, the team plans to continue allocating CDBG funds for non-housing community development to improve community facilities and shelters for the homeless. These facilities, which include parks, recreational areas, and community centers located in CDBG Target Areas, serve as safe, centralized locations that provide a variety of services and opportunities for neighborhood residents.

Infrastructure projects may receive partial funding from the Community Development Block Grant program and can include a variety of initiatives, such as the construction of sidewalks, street reconstruction, replacement of water and wastewater lines, and flood hazard mitigation.

Economic Development: With two universities, a technical college, and an adjunct campus for another university, Marshall has the potential to cultivate a robust workforce. There is a pressing need for a business development center, a business incubator, and affordable rental space for small businesses, particularly in Westside, which currently faces a shortage of commercial enterprises. The CDBG team will collaborate with post-secondary institutions and other training programs to foster small business development and enhance job skills for employees.

3. Evaluation of past performance

CDBG: The CDBG program has undergone significant changes over the past five years, with a major emphasis on utilizing funds to provide more tangible and lasting benefits to low- to moderate-income residents. The City allocated CDBG funds to enhance the George Washington Carver Community Center (GWCCC) and Smith Park within the Westside Target Area. George Washington Carver Elementary School was acquired by Anointed Grace, a non-profit organization, and is currently being renovated and repurposed into a community center, park, and office space for other non-profit entities and micro-enterprises. Funds from PY 2023 and 2024 CDBG allocations have been utilized for these improvements. Smith Park, one of the oldest parks in the city, underwent extensive enhancements during PY 2024 to increase its accessibility and appeal to the predominantly BIPOC, lower-income neighborhoods that surround it. The City also used general funds to make similar improvements to other city parks over the past two years.

During the program years 2020 through 2024, Habitat for Humanity has rehabilitated 61 homes owned and occupied by low- to moderate-income residents, primarily elderly or disabled individuals. The Boys and Girls Club and Communities in Schools have served 2,684 youth through after-school activities, tutoring, and in-school case management and counseling. The Literacy Council has provided literacy education and job readiness training to 197 adults. Mission Marshall Food Pantry has supplied food to 13,450 individuals. The City has provided equipment for neighborhoods to clean up lots and yards, improving living conditions for 400 households. Additionally, the George Washington Carver Community Center has offered recreational access to 1,900 children, youth, and adults.

CDBG-CV: The CDBG-CV program provided financial assistance to 33 micro-enterprises throughout Marshall and to 10 small businesses in CDBG Target Areas, ensuring that food, retail, and service establishments remained open to serve 4,580 neighborhood residents. The CV program also offered subsistence payments to 44 households and provided public services, including access to on-site computers and broadband service, meals, and personal protective equipment (PPE) to 3,501 individuals. Broadband cables and computer equipment were installed in five facilities for use by residents. Anointed Grace was required to install lines across multiple blocks to connect to the GWC Community Center, which facilitated access to several homes along the new lines.

Program Administration: During the first three years of the Consolidated Plan coverage, the CDBG program underwent multiple rounds of reorganization and staff restructuring. The introduction of new personnel and a renewed focus have stabilized the CDBG program, resulting

in a significant increase in outreach to homeless and public service agencies, as well as the general public. The CDBG team initiated the development of a comprehensive homeless assistance plan, collaborating with five organizations and conducting the first Marshall Point in Time and Housing Inventory Count. Additionally, the team has taken steps to develop an affordable housing plan for Westside to reduce the number of abandoned houses and lots, replacing them with affordable owner-occupied dwellings through collaborations with Texas Community Housing Development Organizations (CHDOs), Habitat for Humanity, the Marshall Housing Authority, and private developers. The CDBG team has provided training to subrecipients on managing their funded activities and has shared information about other grant programs that could benefit their missions.

4. Summary of citizen participation process and consultation process

As part of the process for developing the PY 2025-2029 Consolidated Plan, the City conducted a survey in English and Spanish for community response regarding community needs. In addition, another survey concerning fair housing was conducted, also in English and Spanish. Notices for the surveys were posted on the City's website, social media, City's municipal streaming channel, and in the newspaper. The surveys could be completed online or provided at City Hall in paper format. Residents and stakeholders were encouraged to complete both surveys which were available through February, 2025. A public hearing was scheduled for January 28, 2025 but was postponed due to inclement weather. The hearing was rescheduled for February 18, 2025 and at that time the City announced the planning process for the Consolidated Plan and Annual Action Plan. Input from the community about their needs and concerns was solicited. An opportunity was provided for attendees to complete paper versions of the surveys at the hearing. The notice for the hearing and pre-application workshop was posted in English and Spanish on the City website, at City Hall, library and in the general circulation newspaper more than 72 hours before the meeting. An additional notice was posted in these locations when the hearing had to be postponed due to inclement weather. Once HUD released the final award amount for PY 2025 on May 15, 2025, draft budget was developed and a Community Development Advisory Committee meeting was held on May 27, 2025 to review, alter, and approve the final funding structure. The meeting notice was publicized 72 hours in advance and the public was welcomed. A second public hearing was held on June 5, 2025 to kick off the 30-day public comment period and to discuss the final draft Consolidated Plan, including the PY 2025 AAP. The notice for the hearing were posted in English and Spanish on the City website, at City Hall, at the City library, and in the general circulation newspaper more than 72 hours before the meeting. The 30-day public comment period began on June 5, 2025 and ended at Close of Business on July 7, 2025. The Plan was brought before City Council for approval on July 10, 2025 and the public was given the opportunity to speak about the plan at that time. The City Council meeting and agenda is always posted at least 72 hours prior to the meeting.

5. Summary of public comments – to be added after public comment period

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

The City welcomes all comments and perspectives submitted, as long as they do not contain offensive, derogatory, or discriminatory language directed at any individual, group, or organization. Comments pertaining to the CDBG program are reviewed and addressed by the CDBG staff promptly. Comments received by CDBG staff regarding other City matters are forwarded to the appropriate department.

7. Summary

The City of Marshall is dedicated to addressing the concerns of its residents and community organizations. The CDBG team not only meets all federal requirements for involving residents in the planning and evaluation of the program but also dedicates significant time outside of City Hall to engage with under-resourced individuals and representatives of agencies that serve them. During PY 2024, the CDBG Coordinator and the CDBG consultant began developing a plan to address the needs of the homeless, based on ongoing one-on-one interactions with individuals interviewed during the Point in Time (PIT) survey. Additionally, the CDBG Coordinator and other staff members have been conducting windshield surveys of the Westside area to assess the need for the demolition and reconstruction of abandoned housing. During these surveys, they are available to engage with any residents they encounter. Residents are always welcome to visit the CDBG Coordinator at City Hall. Regular conversations with individuals managing social service and housing programs provide further opportunities to understand the needs and concerns of the agencies' clientele.

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 Coordinator	Tami Henderson	City of Marshall

Table 1 – Responsible Agencies

Narrative

The CDBG Coordinator and contract CDBG consultant were responsible for preparing the Consolidated Plan. The CDBG Coordinator is responsible for the administration of the grant program. A contract CDBG consultant supports the Coordinator.

Consolidated Plan Public Contact Information

Tami Henderson

CDBG Coordinator

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DRAFT

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

1. Introduction

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

The City's CDBG Coordinator and the CDBG Consultant will continue to identify private health and mental health agencies serving Marshall. There are no governmental health, mental health, or social service agencies in Marshall. During PY 2024, the CDBG Coordinator began discussions with the executive director of TwelveWay, a residential program for men with substance use disorders and with the executive director of East Texas Open Door, a residential facility for female youth in the CPS system. Discussions are underway to assist both organizations in applying for Texas Emergency Solutions Grants and the Continuum of Care grants through Texas Homeless Network, the Balance of State entity for Texas. Both agencies are interested in expanding their programs to include transitional and permanent housing. The CDBG Coordinator will continue to work with the Marshall Housing Authority. In addition, the City is continually seeking additional public service agencies with which to partner. In PY 2023, the new CDBG Coordinator developed good rapport with the Executive Director of the Marshall Housing Authority with the primary purpose of setting the stage for addressing homelessness through various avenues, including homeless individuals and families securing public housing units or Housing Choice Vouchers. Also during PY 2024, the CDBG Coordinator interacted with the Mike Loftin of HomeWise, a Community Development Housing Organization and Community Development Financial Institution, **and (put in CHDO guy from Dallas)** about infill affordable housing in Westside and the related issue of “heir housing” that is a roadblock to acquiring lots for reconstruction.

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

During PY 2024, the CDBG Coordinator worked with Texas Homeless Network, the Texas Balance of State agency, to develop a process for conducting Marshall's own Point in Time (PIT) and Housing Inventory Count (HIC) surveys and recording the findings. Even though Marshall is within the Pro Rata Share area of the North East Texas Homeless Consortium, the PIT and HIC surveys have not included Marshall or Harrison County. As a result, the CDBG Coordinator **collaborated with xxxxx** and Marshall Police Department to conduct local PIT and HIC surveys and to begin building relationships with the city's homeless population. This effort, along with on-going and new collaborations with Marshall Housing Authority, TwelveWay, and East Texas Open Door is the foundation of the collaborative homeless plan. Marshall's comprehensive homeless plan will

have a strong emphasis on the homeless individuals and families through MHA, youth exiting foster care and other unaccompanied youth through ETOD, adults exiting residential treatment programs or incarceration through TwelveWay. As shelters are reopened the City will work to transition the street homeless through the shelters and into independent housing, Housing Choice Voucher program, transitional housing and permanent supportive housing. All of this work will be dependent upon the agencies being able to participate in the Continuum of Care program and funding and securing ESG funding from the State of Texas.

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

Although Marshall and Harrison County are geographically part of the North East Texas Homeless Consortium, one of Texas' Balance of State local homeless coalitions, the area has not actively participated in the Consortium. Previous City staff did not engage with the Consortium, and currently, there are no active homeless shelters involved. TwelveWay and East Texas Open Doors were unaware of the Consortium and the Continuum of Care program. The CDBG Coordinator and CDBG Consultant have begun efforts to encourage the City of Marshall and local organizations to participate in the Consortium or to establish a Marshall Coalition for the Homeless. This initiative aims to ensure that Harrison County's Pro Rata share and affiliation with the Balance of State are effectively utilized within Marshall and the 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

The CDBG program in Marshall has only recently begun to identify and address the homeless needs in the city. The CDBG Coordinator has started developing relationships with TwelveWay Residential Treatment Facility, East Texas Open Door foster care housing facility, and the Tracy Andrus Foundation's homeless shelter, which is currently closed for renovations but will reopen once it meets local, state, and federal Housing Quality Standards. These programs are primarily focused on short-term shelter and limited-time transitional housing. TwelveWay also offers a form of permanent supportive housing for program graduates who continue to require subsidized or supportive housing. East Texas Open Door operates on a group housing model, providing supportive housing for female youths in foster care. The organization owns three additional structures within the same block and is in the process of developing plans to open one house for female youths exiting their foster care program or foster care in general. The other two houses are being considered for replicating the foster care program into transitional housing for male youths.

Agency/Group/Organization	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?
Marshall Housing Authority	PHA	Housing Needs Homeless	MPH was consulted by phone, email and in person by two people to provide information for the Con Plan and to contribute to the City's new homeless analysis and plan. The anticipated outcomes were met.
Texas Homeless Network	CoC	Homeless	THN was consulted by phone and email regarding the homeless needs in the community, the City's needs to address homelessness, the CoC process, and the PIT and HIC counts. These were initial and intermediate consultations as part of the development of the homeless services plan. The anticipated outcomes were met.
NET Habitat for Humanity	Housing Agency	Housing Needs	NET Habitat for Humanity was consulted regarding the construction of homes for Habitat clientele, the availability of land, and the roadblocks to their developing more houses. Also, as a subrecipient conducting minor to moderate home repair, to determine the level of repairs needed in the houses owned by the applicants coming for services. Are the houses in worse condition than anticipated? The anticipated outcomes were met.
NET Homeless Consortium	Homeless Coalition	Homeless Needs & services	The Homeless Consortium was consulted regarding the regional level and needs of the homeless, ways in which Marshall can dovetail with the work being done in Gregg Count; how to best conduct the PIT and HIC; what agencies in Harrison County have applied for CoC funds through the Consortium. The participation is a work in progress but the anticipated outcomes were met.

Twelveway	Shelter, Permanent Supportive Housing, Recovery Center	Homeless Needs & Services	The organization provides shelter to men exiting incarceration and those with substance use issues. The director was consulted regarding the services, particularly the permanent supportive housing aspect, to determine information about need, and magnitude of the homeless issue in Marshall and to determine forms of collaboration that might be useful to the CDBG team and the agency. The anticipated outcomes were met.
East Texas Open Doors	Housing for homeless and Foster Care youth	Homeless needs & services	This organization currently provides housing and support for CPS youth and homeless youth. The agency provided information on homeless youth and those aging out of foster care and committed to collaborating with the CDBG team in addressing the issues around unhoused youth. The anticipated outcomes were met.
Wiley University	Community Development, University	Community Development	Wiley University and the City engaged in conversations regarding properties around the community that would be beneficial to rehabilitate for public service agencies and economic development efforts, business incubators, with the use of CDBG and other public and private dollars. One piece of the discussions was the development of a cooperative alliance to improve the New Town area. The anticipated outcomes were met.
Tracy Andrus Foundation	Homeless Shelter & Services	Homeless Needs & Services	TAF and the City engaged in conversations regarding the plans for TAF to renovate the old city jail and fire station into a homeless shelter and multi-service center for homeless individuals. The anticipated outcomes were partially met.
HomeWise	Affordable Home Builder and CDFI	Affordable Housing	The City and CEO Mike Loftin discussed HomeWise and how the organization might be able to purchase abandoned lots to develop infill housing for low- to moderate income. The anticipated outcome of introductions and beginning talks were met.

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North East Texas Habitat for Humanity	Housing Rehabilitation & New Housing	Housing	The City engaged in discussions regarding Habitat for Humanity's plans for securing infill lots and constructing new affordable housing for homeownership, the need for housing rehabilitation, potential for demolition and reconstruction of abandoned houses. The anticipated outcomes were met.

Table 2 – Agencies, groups, organizations who participated

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

There are many types of agencies not consulted because they do not have a presence in Marshall or are not be able to sustain a presence given the small population and low need.

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

Name of Plan	Lead Organization	How do the goals of your Strategic Plan overlap with the goals of each plan?
MHA 5-year and Annual Plan	Marshall Housing Authority	The goals of the City's Strategic Plan and those of MHA's Plan complement and overlap in the areas of affordable housing and housing for the homeless.
Harrison County Broadband Study and Action Plan	East Texas Council of Governments	The goals regarding broadband enhancements in the City's Strategic Plan were informed by this study and overlap the county-wide identified needs and plans.
Harrison County Solutions Report	East Texas Council of Governments	2024 Accomplishments in several needs areas for Marshall and Harrison Co. The goals of the Strategic Plan were informed by the data and initiatives particularly in the areas of the environment, transportation, senior services and workforce development.

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 staff collaborates with Harrison County, Longview, and the state of Texas to identify and serve low-income, homeless, and special needs populations. Due to the size of Marshall, it is not cost-effective for many agencies to establish offices within the city, which necessitates that residents seek services in Longview or Shreveport. The CDBG staff works with agencies in Longview, as well as the City of Longview, to assess the capacities of their service providers in assisting Marshall residents. Additionally, the CDBG team has been coordinating with the Salvation Army and the regional bus service managed by East Texas COG to transport homeless individuals seeking shelter to the Salvation Army in Longview. The CDBG Coordinator has also received technical assistance from comparable staff members in Longview, Tarrant County, and other grantees in the East Texas area. Various departments within East Texas COG contributed information for several sections of the Consolidated Plan. The Texas Department of Housing and Community Affairs has provided information regarding the procedures for Marshall and non-profit agencies to access HOME and ESG funds.

Narrative (optional):

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

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

Marshall has developed a Citizen Participation Plan for the CDBG program, which is reviewed annually and updated as necessary. The CDBG staff ensures that the plan complies with federal regulations and is followed during the development of Consolidated Plans, Annual Action Plans, Consolidated Annual Performance and Evaluation Reports (CAPERs), Environmental Reviews, and other activities that involve formal community participation. The City conducted a survey in both English and Spanish to gather community feedback regarding local needs. Additionally, another survey focused on fair housing was conducted, also in English and Spanish. Notices for the surveys were posted on the City's website, social media platforms, the City's municipal streaming channel, and in the local newspaper. Residents had the option to complete the surveys online or in paper format at City Hall. Both residents and stakeholders were encouraged to participate in the surveys, which remained available through February, 2025. A public hearing was initially scheduled for January 28, 2025, but was postponed due to inclement weather. It was rescheduled for February 18, 2025, during which the City announced the planning process for the Consolidated Plan and Annual Action Plan. Community input regarding needs and concerns was actively solicited, and attendees were given the opportunity to complete paper versions of the surveys at the hearing. This hearing was immediately followed by a pre-application training session for non-profit organizations seeking to apply for CDBG funds. The notice for the hearing and the pre-application workshop was posted in both English and Spanish on the City website, at City Hall, in the library, and in a general circulation newspaper more than 72 hours prior to the meeting. An additional notice was posted in these locations when the hearing had to be postponed due to inclement weather.

Once HUD released the final award amount for PY 2025 on May 15, 2025, a draft budget was developed, and the Community Development Advisory Committee met on May 27, 2025, to review, modify, and approve the proposed line items. The meeting notice was publicized 72 hours in advance, and the public was invited to attend. A second public hearing took place on June 5, 2025, to present the final funding plans for PY 2025 and initiate the 30-day public comment period for review of the final draft of the Consolidated Plan, including the PY 2025 Annual Action Plan (AAP). Notices for the hearing were posted in both English and Spanish on the City website, at City Hall, at the City library, and in the general circulation newspaper more than 72 hours before the meeting. The 30-day public comment period commenced on June 5, 2025, and concluded at the close of business on July 7, 2025. The Plan was presented to the City Council for approval on July 10, 2025, during which the public was given the opportunity to provide input. The City Council meeting agenda is always posted at least 72 hours prior to the meeting.

Citizen Participation Outreach

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
1	Survey	General population	21 completed surveys	Highest needs were road reconstruction, housing rehab, affordable housing, water/sewer lines, mental health services, jobs	All surveys were accepted and analyzed. Since none were not accepted, there are no reasons.	marshalltexas.net
2	Newspaper	General Population	All public hearings, meetings, reviews posted	No comments as a result of the media	Not Applicable	marshallnewsmessenger.com
3	Public Notices	Social Media & website	All public hearings, meetings, reviews, news posted	No comments as a result of media	Not Applicable	Marshalltexas.net Facebook.com/marshalltexas.net
4	Public Hearing	General Population	2 public hearings/ xx attendees			
5	CDAC Meeting	Committee + General Population	6 attendees	Committee discussions about projects & funding, no public attendees or comments	All committee comments were accepted. No non-members were present	
6	Pre-Application Workshop	Housing & social service agencies		No comments received	All comments are accepted. No attendees therefore no comments not accepted	
7	Public Comment Period	General Population	To be completed			
8	City Council Meeting	General Population	To be completed			

Table 4 – Citizen Participation Outreach

Needs Assessment

NA-05 Overview

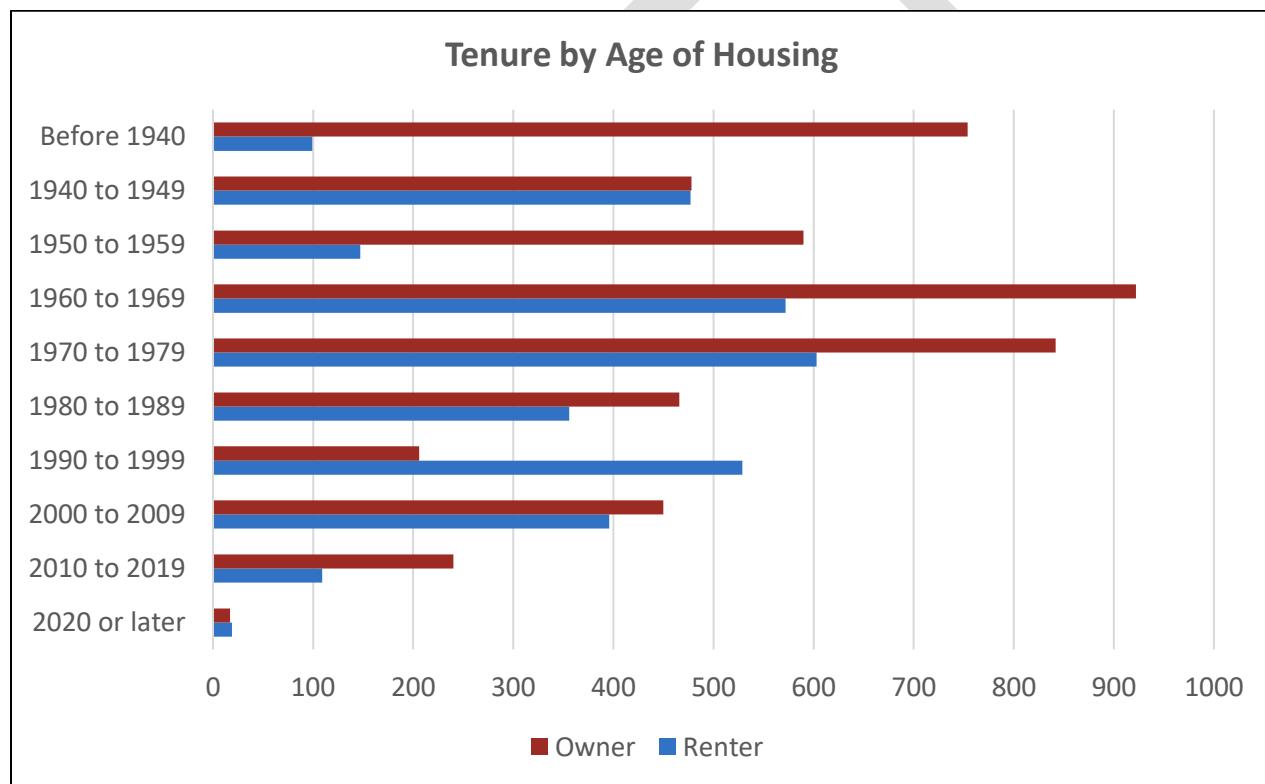
Needs Assessment Overview

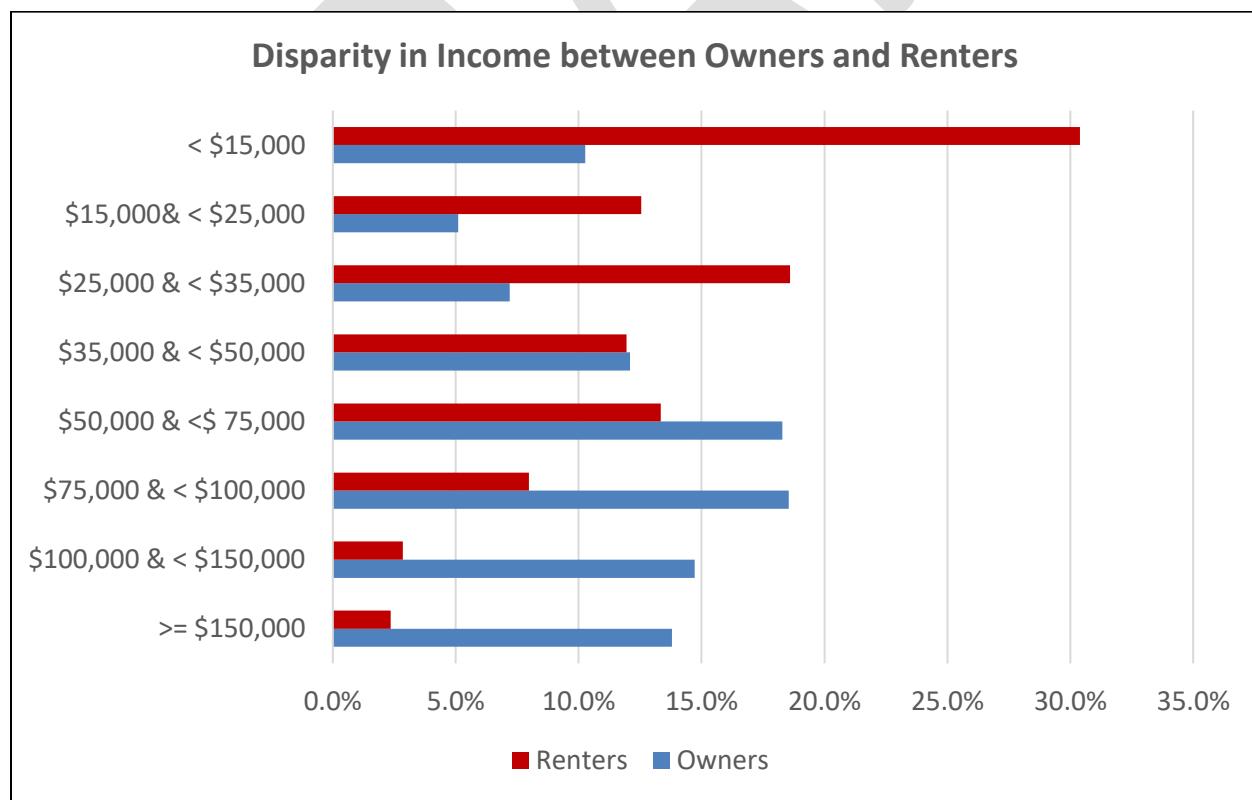
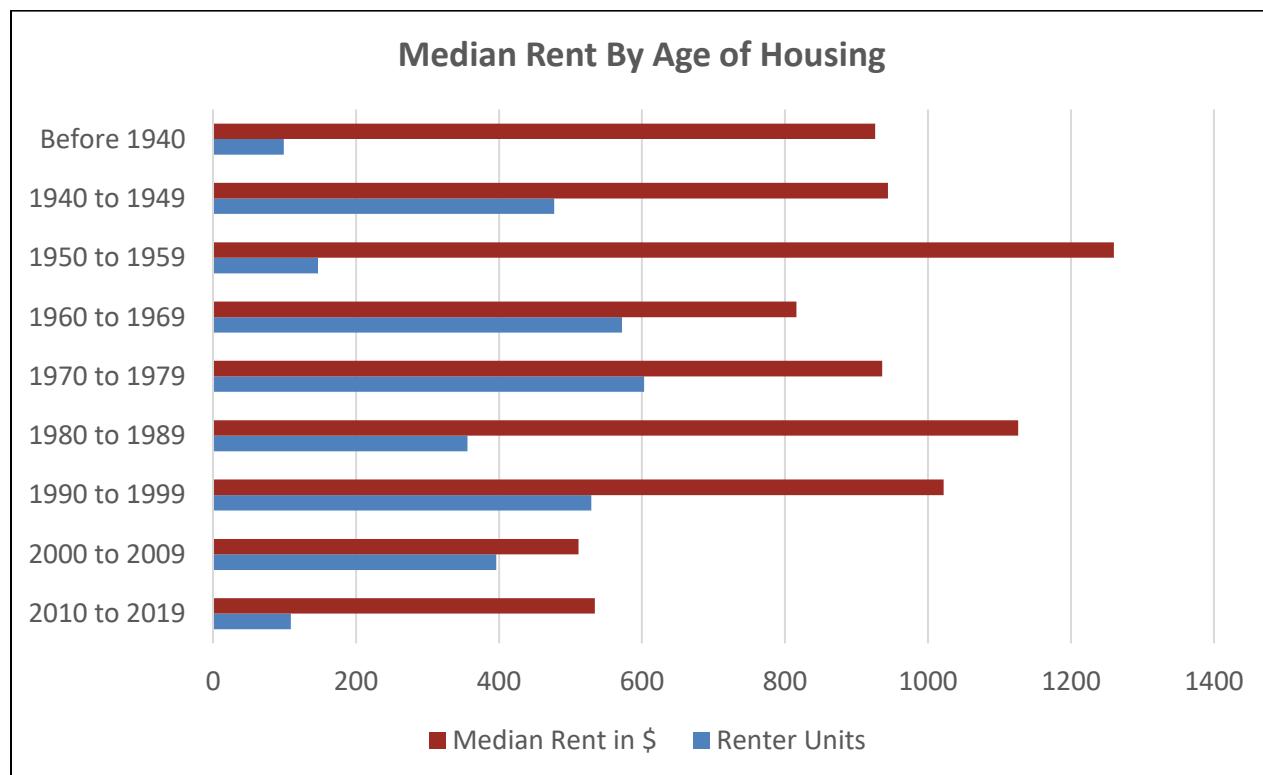
In accordance with HUD regulations, Marshall develops a Consolidated Plan every five years to outline the community's challenges, needs, opportunities, and resources, as well as strategies to integrate these elements for enhanced community benefits. The purpose of the Consolidated Plan is to present a modified PESTLE analysis that identifies barriers to community improvement and potential factors that could promote stability and enhancements in Marshall. The PESTLE analysis model utilized for the Consolidated Plans and Fair Housing Plans includes information on political, economic, social, technological, legislative, and environmental constraints and advantages relevant to improving the lives of populations marginalized by economic status, disability, gender, race, ethnicity, or lack of essential services and amenities. HUD provides a template for the Consolidated Plan and supplies specially tabulated housing data to assist in the analysis of housing needs. The Consolidated Housing Affordability Strategy (CHAS) data files have been curated by the Census Bureau for HUD based on the 2016-2020 American Community Survey (ACS) and are used for the tables pre-populated by HUD. The pre-populated tables for the previous Consolidated Plan were derived from the 2011-2015 ACS and are used to assess changes over time. Since there are no overlapping survey years, there are no residual effects from the earlier figures on the new ones. However, we are now four years past the conclusion of the 2016-2020 surveys, and this information is available for many variables, though not all, from the 2019-2023 ACS. The more recent data will be utilized wherever possible.

According to the 2018-2023 American Community Survey, Marshall has a population of 23,646, with 21,956 individuals living in households and 1,553 residing in group quarters. The majority of the group quarters population consists of individuals in university student housing and those incarcerated in the county jail.

Marshall's population has fluctuated very little since 2000, experiencing a slight decline in both 2010 and 2020, but rebounding to the 2000 level according to the 2019-2023 American Community Survey (ACS) estimates. While the population has recovered, the number of households has decreased, raising the average household size from 2.58 in 2010 to 2.65, as reported by the 2019-2023 ACS. The number of housing units increased between 2010 and 2020; however, due to demolitions, it has slightly declined since 2020. Vacancy rates have been steadily rising, contributing to the decrease in the number of households. The 2019-2023 ACS estimates the vacancy rate to be 15.2%. In 2010, there were 1,076 vacant units (11.1%); in

2020, this number rose to 1,247 vacancies (13.7%), and as of the latest ACS (2019-2023), vacancies have increased to 1,482, or 15.2%. The housing stock is predominantly single-family (77.3%), with duplexes and four-plexes accounting for an additional 6.4% of the housing. There are only 260 dwellings (2.7%) in multi-family developments of 10 or more units. Mobile Homes and RVs account for 466 units (4.8%). Other housing units are located in small multi-family buildings of 5 to 9 units. The dwellings with the most significant housing cost burden are single-family and duplex units, where 75% of renters reside. The shortage of apartments places Marshall renters at greater risk than those in communities with a sufficient number of multi-family rentals. The average age of the housing stock is 42 years, with 2,393 units built before 1952. A significant number of houses were constructed between 1960 and 1980. Uncharacteristically, the lowest median rents are for housing built since 2000. The tables below illustrate housing tenure by housing age and median rent by housing age.





The percentage of extremely low-income households has increased significantly, while the proportion of households earning above the median income has decreased correspondingly. Households with incomes between 50% and 100% of the Area Median Income have experienced only a marginal increase, whereas those with incomes between 30% and 50% have seen a slight decline. The estimates for the periods 2016-2020 and 2019-2023 included approximately 18 months and 36 months, respectively, of surveys conducted during the COVID-19 pandemic—a time when many individuals faced unemployment or reduced working hours. It will not be until the 2023-2027 five-year estimates that we can evaluate the changes without the impact of COVID-19.

DRAFT

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

Summary of Housing Needs

Demographics	Base Year: 2009	Most Recent Year: 2020	% Change
Population	23,745	22,880	-4%
Households	8,365	8,225	-2%
Median Income	\$35,702.00	\$42,467.00	19%

Table 5 - Housing Needs Assessment Demographics

Data Source: 2000 Census (Base Year), 2016-2020 ACS (Most Recent Year)

Number of Households Table

	0-30% HAMFI	>30-50% HAMFI	>50-80% HAMFI	>80-100% HAMFI	>100% HAMFI
Total Households	1,820	1,060	1,775	854	2,720
Small Family Households	515	360	540	369	1,410
Large Family Households	170	35	125	35	390
Household contains at least one person 62-74 years of age	460	290	495	245	800
Household contains at least one person age 75 or older	155	95	260	150	190
Households with one or more children 6 years old or younger	325	129	289	64	160

Table 6 - Total Households Table

Data Source: 2016-2020 CHAS

Housing Needs Summary Tables

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

	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
NUMBER OF HOUSEHOLDS										
Substandard Housing - Lacking complete plumbing or kitchen facilities	0	10	0	0	10	20	0	0	0	20
Severely Overcrowded - With >1.51 people per room (and complete kitchen and plumbing)	15	0	0	0	15	0	20	0	0	20
Overcrowded - With 1.01-1.5 people per room (and none of the above problems)	180	0	15	0	195	15	0	25	0	40
Housing cost burden greater than 50% of income (and none of the above problems)	585	115	15	0	715	220	85	20	0	325

	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
Housing cost burden greater than 30% of income (and none of the above problems)	205	465	145	15	830	115	35	195	35	380
Zero/negative Income (and none of the above problems)	100	0	0	0	100	20	0	0	0	20

Table 7 – Housing Problems Table

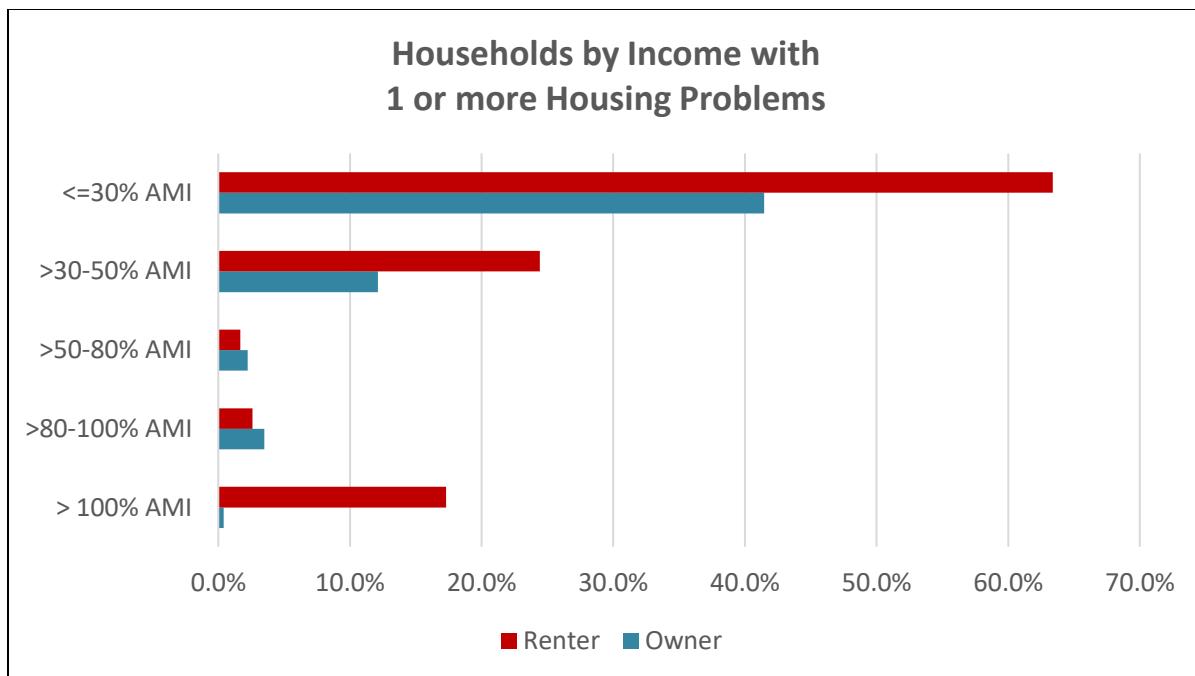
Data 2016-2020 CHAS
Source:

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

	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
NUMBER OF HOUSEHOLDS										
Having 1 or more of four housing problems	780	125	30	0	935	255	105	45	0	405
Having none of four housing problems	455	580	690	180	1,905	325	250	1,010	674	2,259
Household has negative income, but none of the other housing problems	0	0	0	0	0	0	0	0	0	0

Table 8 – Housing Problems 2

Data 2016-2020 CHAS
Source:



3. Cost Burden > 30%

	Renter				Owner			
	0-30% AMI	>30-50% AMI	>50-80% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	Total
NUMBER OF HOUSEHOLDS								
Small Related	230	130	54	414	70	75	0	145
Large Related	140	0	15	155	30	35	0	65
Elderly	190	210	10	410	235	10	200	445
Other	375	245	95	715	35	20	10	65
Total need by income	935	585	174	1,694	370	140	210	720

Table 9 – Cost Burden > 30%

Data Source: 2016-2020 CHAS

4. Cost Burden > 50%

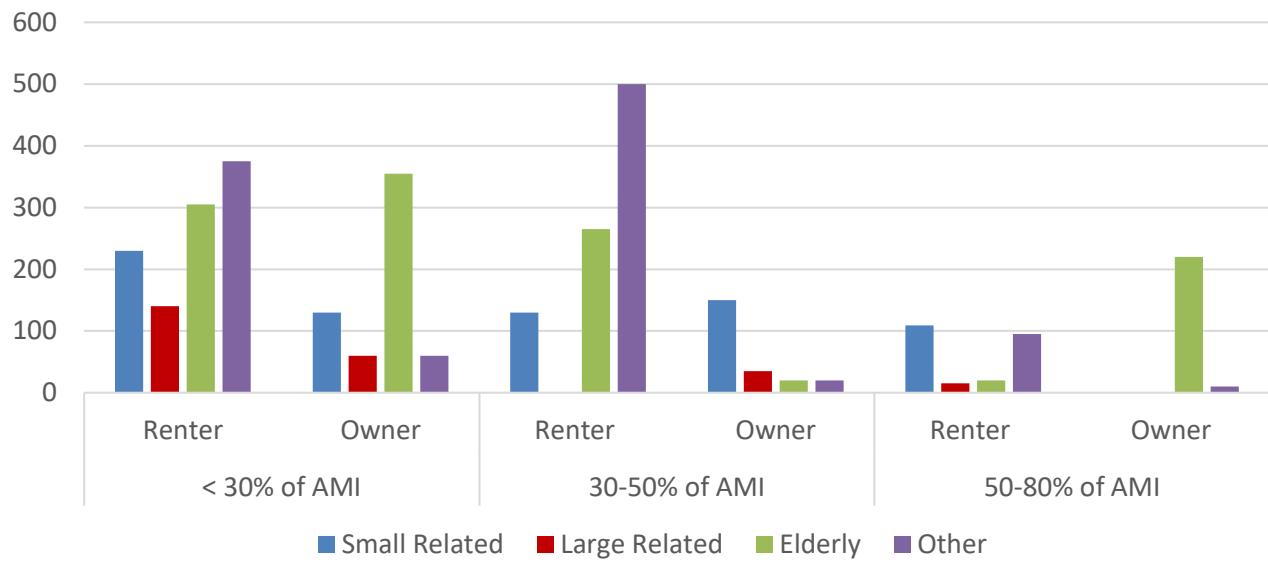
	Renter				Owner			
	0-30% AMI	>30-50% AMI	>50-80% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	Total
NUMBER OF HOUSEHOLDS								
Small Related	0	0	55	55	60	75	0	135
Large Related	0	0	0	0	30	0	0	30

	Renter				Owner			
	0-30% AMI	>30-50% AMI	>50-80% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	Total
Elderly	115	55	10	180	120	10	20	150
Other	0	255	0	255	25	0	0	25
Total need by income	115	310	65	490	235	85	20	340

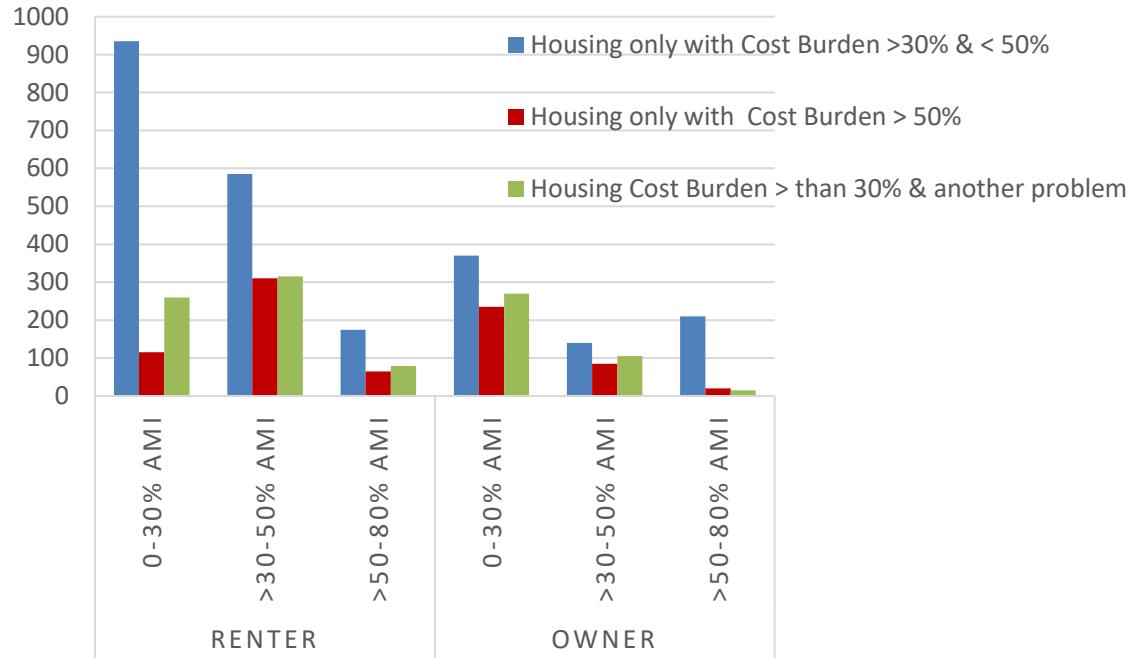
Table 10 – Cost Burden > 50%

Data Source: 2016-2020 CHAS

Households with a Housing Cost Burden of Greater than 30% of Income by Tenure for Extremely Low-, Low- and Moderate Income



LOW- TO MODERATE INCOME HOUSEHOLDS WITH A COST BURDEN GREATER THAN 30% OF INCOME



5. Crowding (More than one person per room)

	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
NUMBER OF HOUSEHOLDS										
Single family households	195	0	15	0	210	15	20	25	0	60
Multiple, unrelated family households	0	0	0	0	0	0	0	0	0	0
Other, non-family households	0	0	0	0	0	0	0	0	0	0
Total need by income	195	0	15	0	210	15	20	25	0	60

Table 11 – Crowding Information – 1/2

Data Source: 2016-2020 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	718	240	69	1027	142	107	72	321

Table 12 – Crowding Information – 2/2

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

Based on the 2018-2022 American Community Survey (ACS), there are 2,501 single-person households in Marshall, of which 1,540 are renters. Nearly half (1,009) of these renters are aged 65 or older. With 1,540 single renters to accommodate, there are only 811 rental units with zero or one bedroom available, which must serve both single individuals and two-person households. This situation forces many single renters to move into two-bedroom units, which may either exceed their budget or be in poor condition. The housing mismatch is further exacerbated when larger households, due to affordability constraints, are compelled to occupy one-bedroom or two-bedroom units. According to the most recent ACS estimates, the median income for a person living alone is \$22,090. A single person earning the median income can only rent a unit for \$550 or less per month to be considered affordable. The median rent for an efficiency (0-bedroom) is \$549, while the median rent for a one-bedroom unit is \$692. In Marshall, there are only 698 rental units that are affordable for a single-person renter earning the median income. However, by definition, half of all renters (1,250) earn less than the median income. To afford a one-bedroom unit at the median rent, a tenant would need a monthly salary of \$2,306, which is well beyond the means of most young adults and individuals relying on Social Security. Many people living alone are employed in minimum-wage jobs. In Texas, the minimum wage is \$7.25 per hour. A person earning minimum wage and living alone would need to work 80 hours a week to afford a one-bedroom unit at the median rent.

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.

According to the Centers for Disease Control's 2022 Behavioral Risk Factor Surveillance System and the 2018-2022 ACS estimates, 2,153 adults (12.1%) in Marshall have an independent living disability, with mobility and cognitive disabilities being the most prevalent. Approximately 300 adults reside in nursing facilities or non-institutional group quarters, leaving over 1,800 individuals who may require specialized housing assistance, depending on the severity of their disability and the availability of another adult to provide care and services. The median income for both male and female adults with disabilities is nearly \$10,000 less than that of their non-disabled counterparts. Disabled adults face significant challenges in finding affordable housing;

moreover, over half of Marshall's housing stock was constructed before 1970, which further complicates the search for accessible units. Additionally, the Americans with Disabilities Act (ADA) mandates that only owners of buildings with four or more units must comply with accessibility laws, and less than 20% of rental housing units meet this criterion. Given the lack of affordability, the age of the structures, and the limited requirements for ADA compliance, very few units are available to disabled renters.

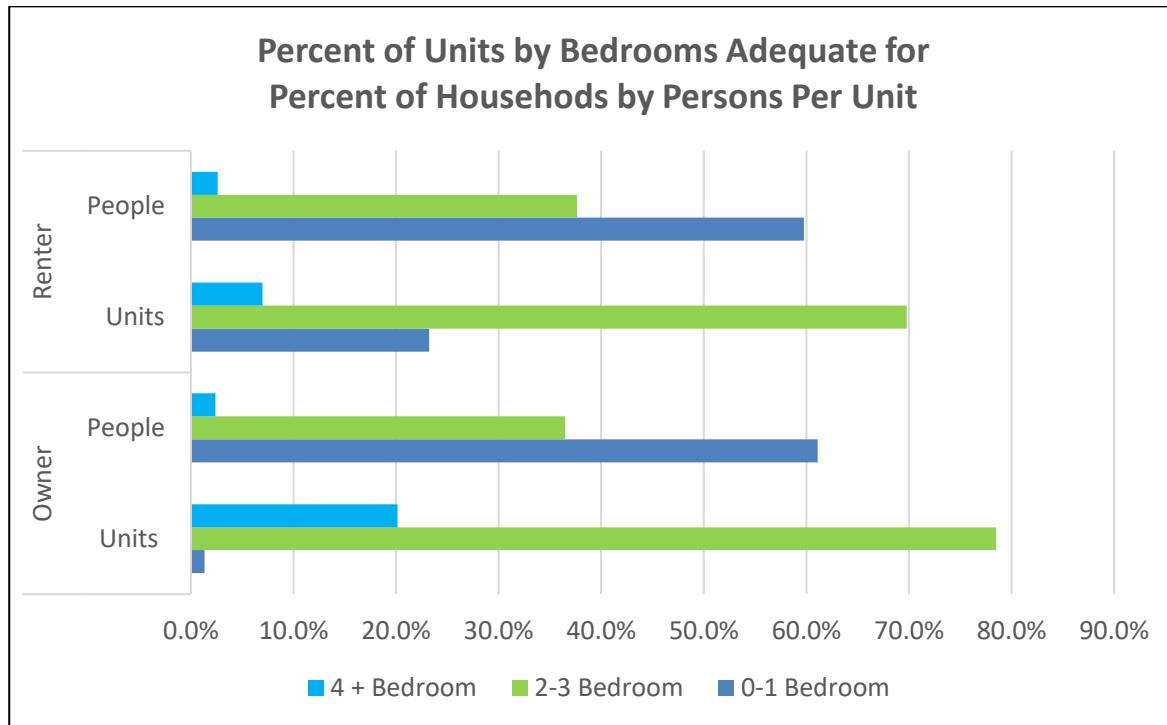
There is a lack of information regarding domestic violence and sexual assault crimes in Marshall, and no data are available on stalking incidents. The Marshall Police Department **reported xxx domestic violence calls and xxxx sexual assault calls in 2023.** According to the FBI crime statistics for that year, the rate of rape in Marshall was 55 per 100,000 residents. The Security Gauge on Neighborhood Scout indicates that there were 13 reported rapes and 73 assaults in Marshall in 2023. However, there are no separate statistics for domestic violence within the categories of rape or assault. Incidents of dating violence and stalking tend to occur at higher rates around colleges and universities compared to the general population. Students living on campus have limited options for relocating to safety. With two universities located in Marshall, it can be inferred that incidents of dating violence and stalking may be more prevalent in the areas surrounding these institutions.

What are the most common housing problems?

The most pressing housing issues include the age and condition of housing, the affordability of housing for low- to moderate-income households, and the mismatch between affordability and unit size. A high vacancy rate is largely attributed to the prevalence of older units in need of significant repairs, many of which are abandoned dwellings many of which are considered "heir housing." These vacancies create challenges for households seeking adequate housing, regardless of cost. The median income for one-person households is \$22,090, which translates to a housing affordability threshold of \$552. Nearly half of small households, including the elderly, with incomes at 80% or less of the median income experience a housing cost burden. There are too few zero- and one-bedroom units available for smaller households.

Consequently, small low-income households are compelled to rent or purchase larger units than they can afford. Conversely, households with incomes significantly above the median and very large households are competing for a limited number of large units. These households must also accept mid-range housing options. Both scenarios squeeze moderate-sized, moderate-income households out of the market that they can afford. As illustrated in the graph below, the number of households with one or two persons far exceeds the number of zero- and one-bedroom units. More than one-third of renters and nearly two-thirds of owners with one or two persons per household must seek housing that is larger than they typically require. Conversely, just over 5% of large-family renters and 18% of large-family owners must find

housing that is smaller than they would normally need. This situation imposes a cost burden on many smaller households and a size burden on larger households. Additionally, the number of vacant units not only reduces the availability of housing but can also pose a danger and become an eyesore for neighborhoods.



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

According to the National Housing Preservation Database, over one-third (269 units) of federally assisted rental units will have their subsidies expire within the next 6 to 10 years. This situation will impose a significant burden on low-income residents of these units and on the city as a whole, as these tenants may face homelessness or excessive financial strain. The age and condition of the housing units affect all residents; however, individuals with disabilities are impacted to a greater extent because older housing is often not compliant with the Americans with Disabilities Act (ADA) and cannot be adapted without substantial investment. Additionally, the elderly are particularly affected by the age and size of these units, especially rental properties. Nearly half of single-person households are elderly, and they are competing with working-age individuals who often have fewer financial and physical constraints.

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

The HUD Picture of Subsidized Households 2021 report indicates that the average waiting time for HUD-assisted housing in Marshall is 32 months. Those on the waiting list are predominantly precariously housed and urgently in need of affordable housing. With a 32-month wait, it is likely that many individuals will become homeless, including those who may have to double up with others, before a unit becomes available. According to the CHAS database, 90% of elderly households fall within the low- to moderate-income bracket, with 20% of elderly families and 54% of elderly singles earning less than 30% of the area median income. Among families with children, 65% of renter households are classified as low- to moderate-income, with 48% categorized as extremely low-income (earning less than 30% of the area median income). These extremely low-income households are at imminent risk of becoming homeless. Without shelters in Marshall, they would need to travel to Longview or Shreveport or seek shelter with other households to avoid being unsheltered. Additionally, Marshall currently lacks rapid re-housing assistance, and 269 federally assisted rental units are set to have their subsidies expire within the next 6 to 10 years.

The Centers for Disease Control and Prevention's (CDC) Behavioral Risk Factor Surveillance System (BRFSS) collects data on key factors that affect health outcomes. Housing insecurity is a significant factor, measured by the likelihood that a household will be unable to pay rent or mortgage payments, as well as the probability that utilities will be shut off. Both situations can lead to homelessness if not addressed within a month. The latest available BRFSS data for Marshall from 2022 indicate that 20.3% of households experience housing insecurity due to an inability to pay their rent or mortgage. An additional 14.6% of Marshall residents live in housing where utilities have been shut off.

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:

At-risk populations are those in households unable to maintain housing and utility payments. Homelessness is particularly likely for renters who cannot pay their rent, as the eviction process is much swifter for renters than for homeowners. Renters facing a housing cost burden exceeding 50% of their income are especially vulnerable. According to the latest ACS, there are 797 renter households with housing costs that exceed 50% of their income. An additional model for analysis is the Centers for Disease Control and Prevention's multi-variable regression model, which

computes the probability that households experiencing housing insecurity will become homeless. The housing insecurity measure estimates the percentage of households with past-due rent or mortgage payments. A secondary measure estimates the percentage of households for which utilities have been shut off at any time during the previous 12 months. Those who have received eviction notices or had their utilities shut off are at the greatest risk of homelessness.

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

The primary housing characteristics associated with instability include the age and quality of the housing stock, as well as the fact that renters in Marshall earn less and pay more than homeowners. A significant number of rental units in Marshall are vacant but not listed on the market, likely due to their poor condition, which exacerbates the general housing shortage. Furthermore, there is a scarcity of multifamily housing and one-bedroom units, leading to a mismatch between supply and demand. As a result, singles and small families are compelled to rent larger single-family homes instead of smaller one-bedroom apartments. Consequently, the cost burden is substantial, and renters in Harrison County receive eviction notices at a rate of 4.4 per 100 renters, according to the Eviction Lab.

Discussion

Marshall's median household income is \$49,162, which represents 67% of the median income for Texas. Additionally, Marshall is experiencing population growth; however, new housing construction remains minimal. The median year of construction for residential properties is 1952, and only 263 units have been built since 2010. Furthermore, Marshall has a notably high vacancy rate of 20.1%, with over half (56%) of the vacant units not available for sale or rent. While there is no definitive explanation, the age of the housing stock and the fact that most vacant units are not part of the housing market suggest that the available housing may be in poor condition. Without significant investments to rehabilitate existing housing units or to demolish and rebuild, a shortage of housing—particularly affordable rental housing—will persist. Among rental properties, only 742 units are subsidized, primarily through Housing Choice Vouchers, public housing units, and Low-Income Housing Tax Credit units. Although Marshall's median income for homeowners is considerably lower than the state average, the median percentage spent on housing costs is only 13%, and just 15.4% of homeowners experience a cost burden of 30% or more of their income. In contrast, the situation for renters is markedly different. The median gross rent in Marshall accounts for 34% of renters' income, and 55.6% of renters face a housing cost burden of 30% or more. One contributing factor to the high rate of cost burdens among renters is the shortage of one-bedroom units compared to the availability of two-bedroom and three-bedroom units.

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

Marshall's population comprises 64.7% BIPOC (Black, Indigenous, People of Color) and 36.3% non-Hispanic White individuals. While income often influences the quality of housing, race and ethnicity also play significant roles. Racial inequality frequently affects the quality of available housing due to disparities in income, location, and housing type. The tables below, pre-populated by HUD with CHAS data provided by the Census Bureau, display the number of households by race and ethnicity within each income range at or below 100% of the area median. The maps following the HUD-populated tables illustrate that Marshall is socio-economically divided by US-59, which bisects the city; the west side has lower income levels and higher percentages of BIPOC residents. These block groups contain the oldest housing, with the majority built before 1950, and some of the highest vacancy rates, including one area with a vacancy rate of 64.7%. The region west of US-59 and south and east of Hwy 43 is the only area with a median housing age of less than 43 years. In this area, 25% of African Americans experience a housing cost burden of between 30% and 50% of their income, while the remaining 75% face a cost burden exceeding 50% of their income. Hispanic-headed households in the areas south and east of Hwy 43 do not experience a cost burden greater than 30% of their income, whereas 13% of Hispanics north of Hwy 80 have a cost burden exceeding 30%. More than half (52.9%) of non-Hispanic Whites have a housing cost burden greater than 30% of their income, although they are more evenly distributed throughout all areas of the city.

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	910	175	140
White	215	65	40
Black / African American	640	110	39
Asian	0	0	0
American Indian, Alaska Native	0	0	0
Pacific Islander	0	0	0
Hispanic	60	0	60

Table 13 - Disproportionately Greater Need 0 - 30% AMI

Data
Source:

2016-2020 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	765	425	0
White	215	120	0
Black / African American	350	275	0
Asian	0	0	0
American Indian, Alaska Native	4	0	0
Pacific Islander	0	0	0
Hispanic	170	35	0

Table 14 - Disproportionally Greater Need 30 - 50% AMI

Data 2016-2020 CHAS

Source:

*The four housing problems are:

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

50%-80% of Area Median Income

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	469	809	0
White	304	399	0
Black / African American	75	375	0
Asian	0	0	0
American Indian, Alaska Native	10	0	0
Pacific Islander	0	0	0
Hispanic	80	30	0

Table 15 - Disproportionally Greater Need 50 - 80% AMI

Data 2016-2020 CHAS

Source:

*The four housing problems are:

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

80%-100% of Area Median Income

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	215	730	0
White	145	285	0
Black / African American	10	345	0
Asian	0	0	0
American Indian, Alaska Native	0	0	0
Pacific Islander	0	0	0
Hispanic	50	95	0

Table 16 - Disproportionally Greater Need 80 - 100% AMI

Data 2016-2020 CHAS
Source:

*The four housing problems are:

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

Discussion

The most significant housing issue is cost burden, as only 281 housing units are overcrowded, and even fewer lack complete plumbing and/or kitchen facilities. The disparity in housing costs exceeding 30% of income varies by income level and tenure. Non-Hispanic Whites, regardless of tenure, exhibit the highest percentage of cost burden among those with incomes at or below 30% of the area median income (AMI). As incomes rise, this trend reverses; non-Hispanic Whites have a lower percentage of housing cost burdens compared to African Americans, but not when compared to Hispanics. When analyzing the data by tenure, homeowners with incomes below 30% of AMI experience a significantly higher rate of housing cost burdens than renters. However, regardless of race or ethnicity, homeowners with incomes above 30% of AMI have lower percentages of cost-burdened households than renters. According to the tables provided by HUD, Hispanics represent a larger share of households facing housing problems. Furthermore, when not solely focusing on cost burden as a housing issue, it becomes evident that Hispanics account for the majority of overcrowded units and those lacking complete plumbing and/or kitchen facilities. Although Hispanics comprise the smallest population and household base

compared to Whites and African Americans, each household facing these issues represents a larger percentage of the total households within this ethnic group.

DRAFT

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

Severe housing problems are defined as situations where there are more than 1.5 persons per room, housing costs exceed 50% of income, or there is a lack of complete kitchen or plumbing facilities. In Marshall, very few housing units lack complete plumbing or kitchen amenities. The primary severe housing issues are overcrowding and extremely high housing cost burdens. African American households with incomes below 50% of the area median have a disproportionately greater need compared to non-Hispanic White households. Conversely, Hispanic and non-Hispanic White households with incomes above 50% of the area median outnumber African American households experiencing severe housing problems.

In the area south and east of Highway 43, 75% of African Americans experience a severe housing cost burden, spending more than 50% of their income on housing. The African American population in this region increased by over 20% between 2010 and 2020. This area is well-suited for development, as it appears that residents have relocated from older neighborhoods to the north, where the median age of housing ranges from 75 to 85 years. In these northern neighborhoods, vacancy rates fluctuate between 25% and 64.7%, and the African American population declined by more than 30% from 2010 to 2020.

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	750	335	140
White	175	100	40
Black / African American	540	210	39
Asian	0	0	0
American Indian, Alaska Native	0	0	0
Pacific Islander	0	0	0
Hispanic	35	20	60

Table 17 – Severe Housing Problems 0 - 30% AMI

Data Source: 2016-2020 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	509	680	0
White	145	190	0
Black / African American	219	415	0
Asian	0	0	0
American Indian, Alaska Native	4	0	0
Pacific Islander	0	0	0
Hispanic	135	70	0

Table 18 – Severe Housing Problems 30 - 50% AMI

Data 2016-2020 CHAS
Source:

*The four severe housing problems are:

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

50%-80% of Area Median Income

Severe Housing Problems*	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	134	1,139	0
White	69	624	0
Black / African American	20	430	0
Asian	0	0	0
American Indian, Alaska Native	0	10	0
Pacific Islander	0	0	0
Hispanic	45	65	0

Table 19 – Severe Housing Problems 50 - 80% AMI

Data 2016-2020 CHAS
Source:

*The four severe housing problems are:

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

80%-100% of Area Median Income

Severe Housing Problems*	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	100	845	0
White	50	380	0
Black / African American	4	350	0
Asian	0	0	0
American Indian, Alaska Native	0	0	0
Pacific Islander	0	0	0
Hispanic	50	95	0

Table 20 – Severe Housing Problems 80 - 100% AMI

Data Source: 2016-2020 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

Severe housing problems often stem from excessive cost burdens, defined as spending 50% or more of one's income on housing. The percentage of severely cost-burdened non-Hispanic households decreases significantly as income levels rise. In contrast, a considerably higher percentage of Hispanic households experience severe cost burdens compared to other racial and ethnic groups. African American households report a lower percentage of severe housing problems than non-Hispanic White households. The age of housing plays a significant role in determining quality, which in turn affects cost. Older units with structural issues are more likely to lack complete kitchens and plumbing, resulting in lower rents that may still be affordable for very low-income individuals (those earning between 50-80% of the Area Median Income, or AMI). Conversely, extremely low- and very low-income homeowners often cannot afford to repair their homes or relocate to newer, sound housing. According to the American Community Survey (ACS), 37% of owner-occupied units were built before 1960, while only 21% of rental units were constructed during that same period. Additionally, only 28% of housing units built after 1979 are owner-occupied, compared to 43% of renter-occupied units. As older rental units are removed

from the market, renters are compelled to move into newer, more expensive accommodations. Lower-income homeowners may continue to reside in older housing despite its level of disrepair.

DRAFT

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:

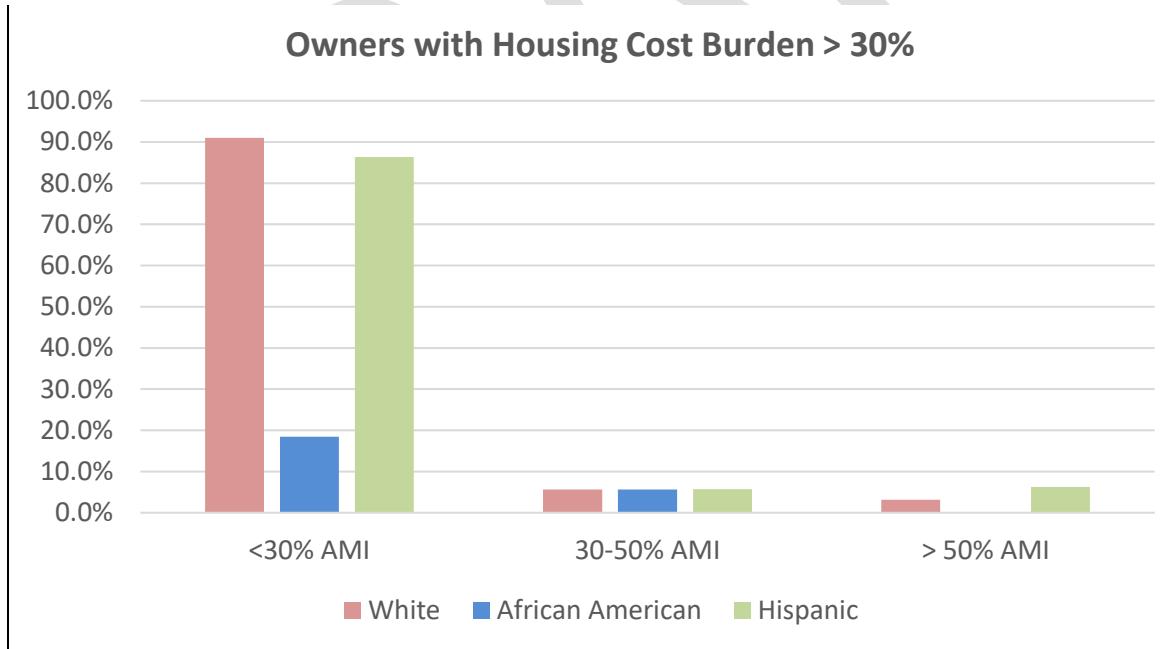
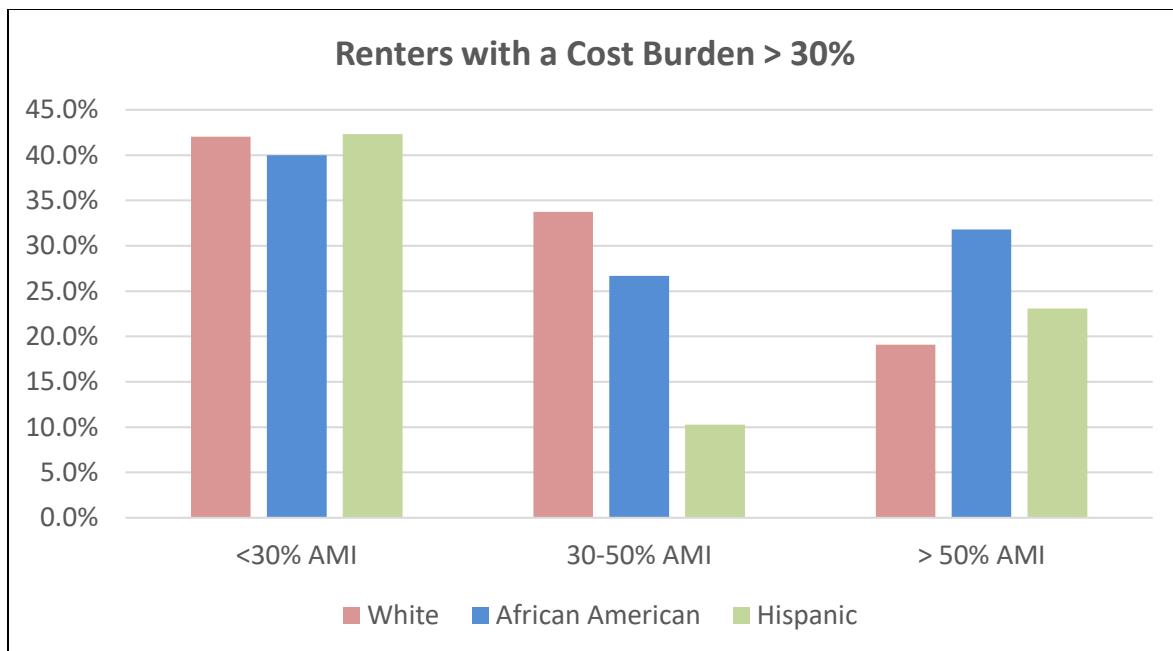
Housing cost burden is the primary concern for households. There is no significant difference in the percentage of cost-burdened households among various racial and ethnic groups across different income levels. For this analysis, only non-Hispanic Whites, African Americans, and Hispanics were included, as the sample sizes for other groups were insufficient to draw definitive conclusions. No racial or ethnic group demonstrates a disproportionately greater need overall. The two charts below the table compare the differences between renters and homeowners.

Housing Cost Burden

Housing Cost Burden	<=30%	30-50%	>50%	No / negative income (not computed)
Jurisdiction as a whole	5,815	1,034	1,195	145
White	2,820	484	375	40
Black / African American	2,210	360	674	39
Asian	4	15	0	0
American Indian, Alaska Native	0	10	4	0
Pacific Islander	0	0	0	0
Hispanic	735	135	135	60

Table 21 – Greater Need: Housing Cost Burdens AMI

Data Source: 2016-2020 CHAS



Discussion:

There is no significant difference in the percentage of cost-burdened households among various racial and ethnic groups across different income levels. For this analysis, only non-Hispanic Whites, African Americans, and Hispanics were included, as the sample sizes for other groups were insufficient to draw definitive conclusions. No racial or ethnic group demonstrates a disproportionately greater need regarding housing cost burden for incomes below 50% of the Area Median Income (AMI). African Americans with incomes above 50% AMI have a 12% higher proportion of renters experiencing a cost burden compared to non-Hispanic Whites. The percentages of renters facing a high cost burden are not significantly different among African Americans, non-Hispanic Whites, and Hispanics. The percentage of homeowners with a high cost burden does not significantly differ among the racial and ethnic groups, with the exception of African Americans with incomes below AMI, who have a 72% lower percentage of cost burden households compared to non-Hispanic Whites and a 66% lower percentage compared to Hispanics.

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

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

The percentage of White cost-burdened households earning 30% AMI or less is higher than the overall percentage for the jurisdiction, as well as for African American and Hispanic households. African Americans experience a disproportionately higher rate of housing cost burden among households with incomes exceeding 50% AMI. When examining the data at a more granular level, the disparities become more pronounced by tenure. The gap between White homeowners and other groups is significant for those classified as extremely low-income ($\leq 30\%$ AMI); however, this disparity is not observed among White renters in the same income bracket. Conversely, African American homeowners with incomes between 30% and 50% AMI, as well as renters earning above 50% AMI, exhibit a disproportionately higher percentage of cost-burdened households. African American very low-income homeowners (30-50% AMI) face a cost burden rate that is three times higher than that of other groups, and they also experience significantly elevated rates (8% and 11%) of cost burden among low- to moderate-income renters (50-80% AMI) compared to other demographics. In contrast, Hispanics are at or below the jurisdiction-wide percentages for the specified income ranges.

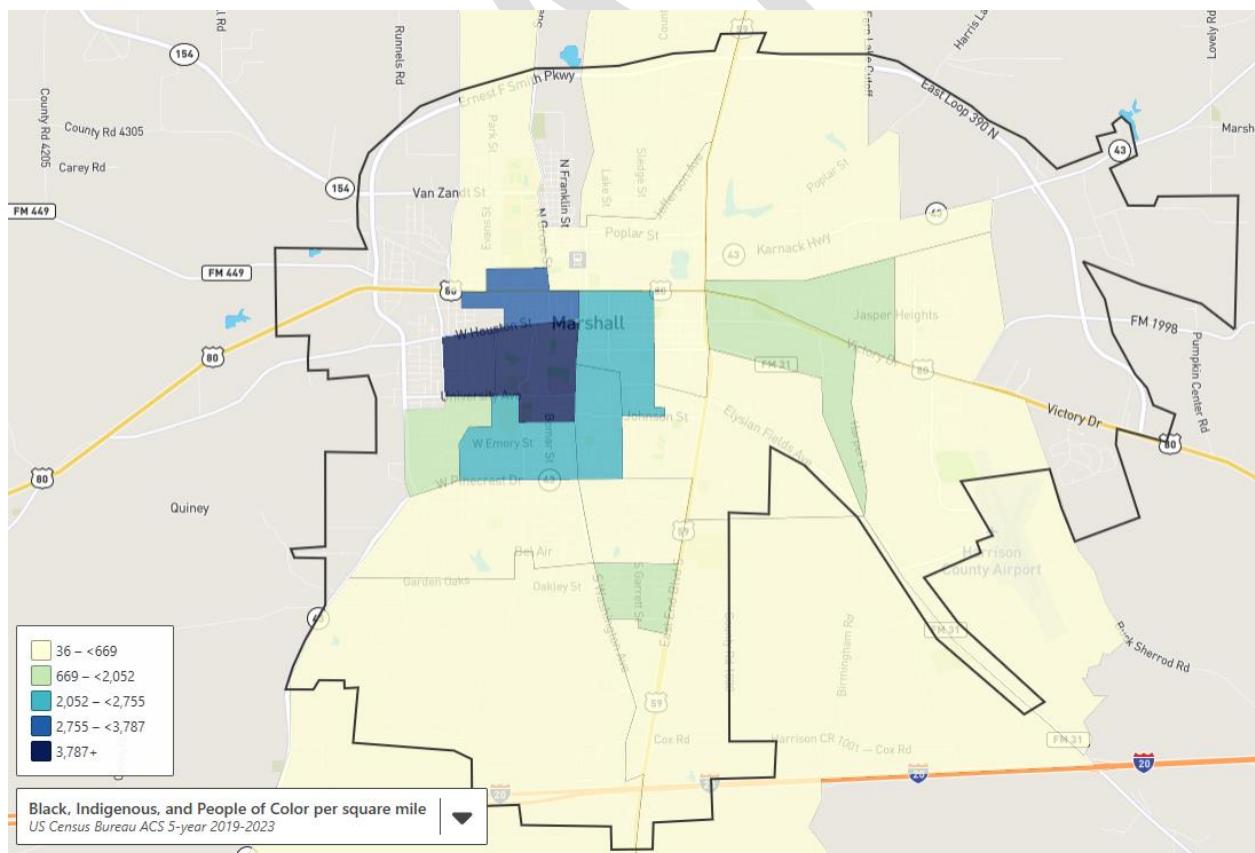
If they have needs not identified above, what are those needs?

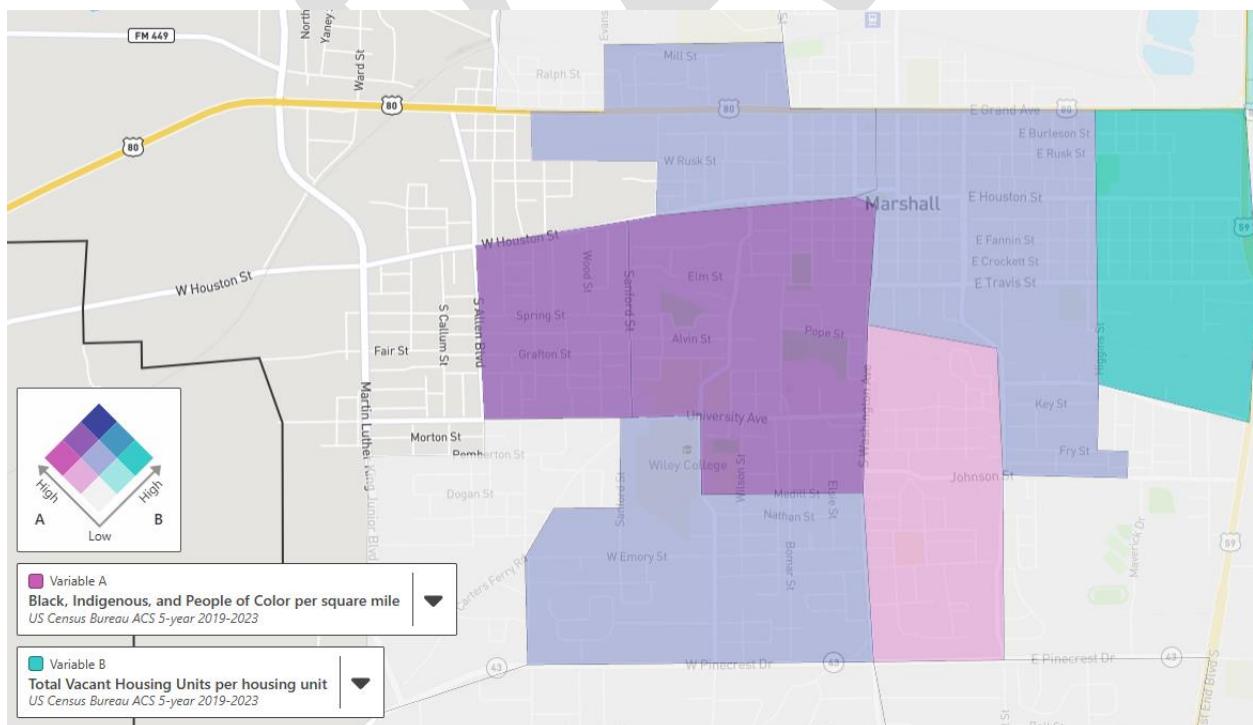
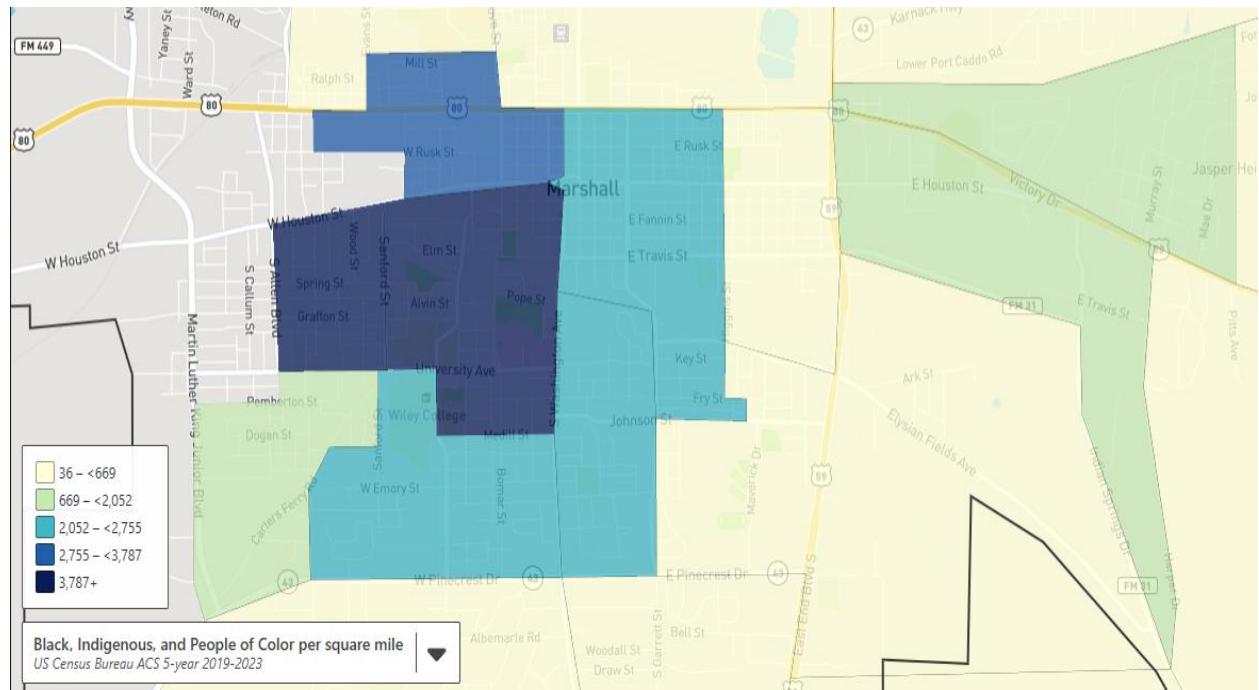
As described in NA-20, tenure appears to be the primary factor contributing to the disparity in cost burdens among different racial and ethnic groups. Newer rental units tend to be more desirable than older units built before 1960, allowing them to command higher rents while attracting households from various income levels. More than one-third of owner-occupied housing was constructed prior to 1960, and in many cases, these homes are occupied by extremely low-income owners who may be living in unsound conditions but are unable to relocate. This inability to move may result from a lack of clear ownership deeds, prohibitive moving costs, or a strong emotional attachment to their homes. In contrast, renters generally have greater mobility.

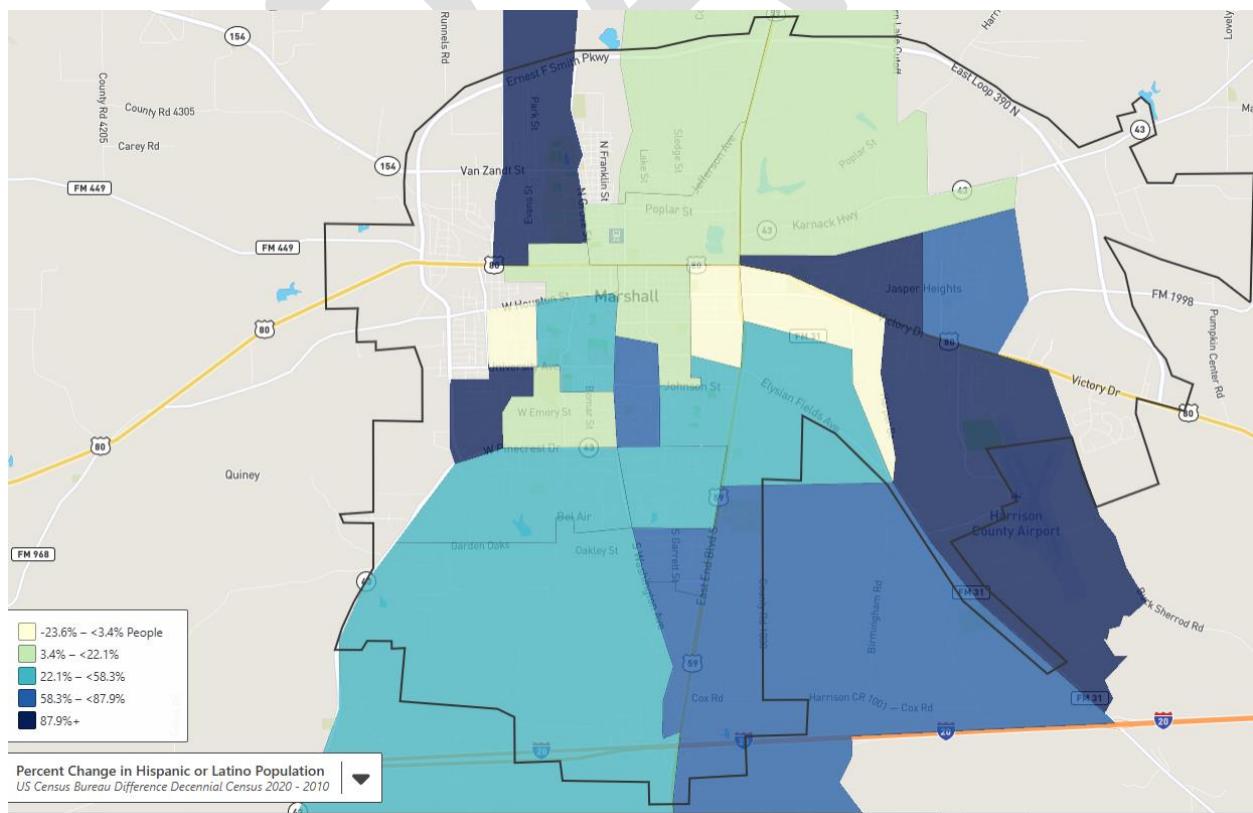
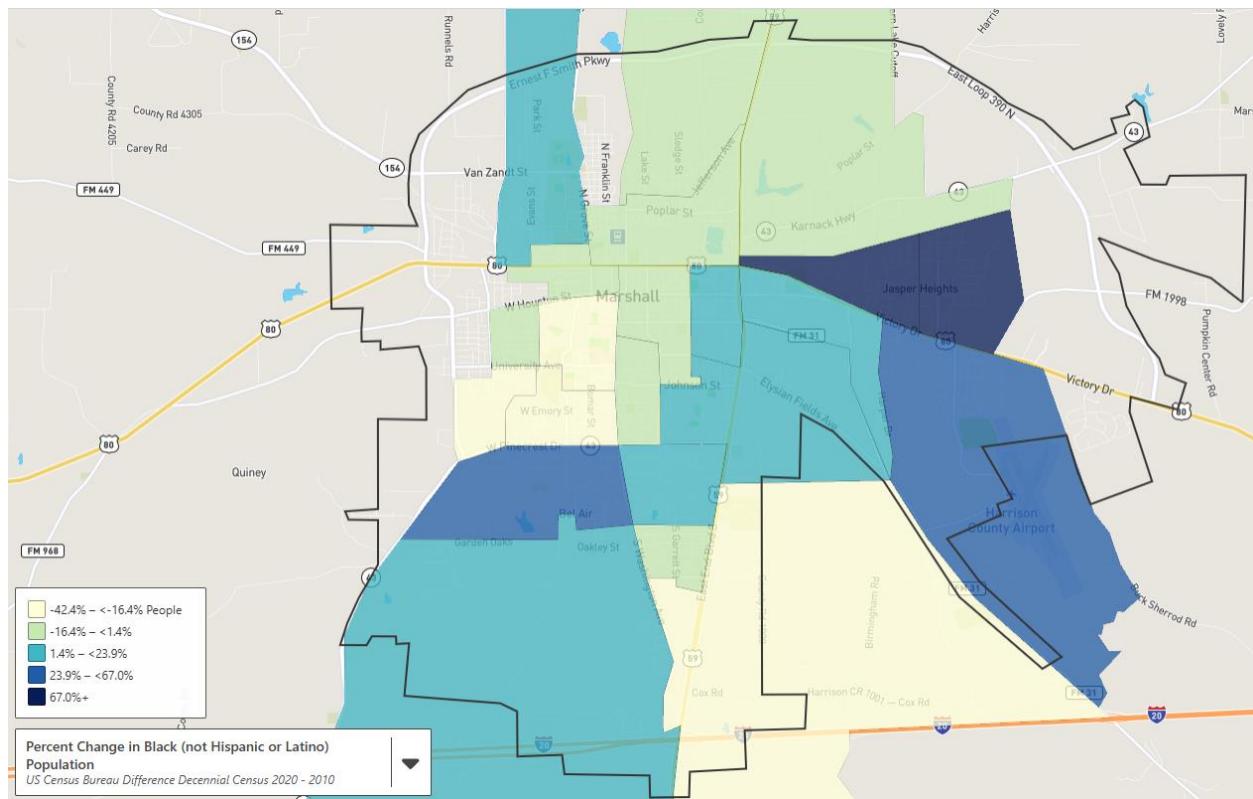
A significant factor closely related to HUD's definition of "housing problems" is the age of the housing stock. In Marshall, only 15.4% of the housing units were built since 2000, while 21.8% were constructed before 1950. Partly due to the age of the housing stock, the vacancy rate in Marshall stands at 15.2%, with 54.3% of vacant units classified for undetermined reasons, possibly indicating abandonment. Consequently, there is a pressing need for more units available for occupancy, whether through new construction, rehabilitation, or demolition and reconstruction of existing units.

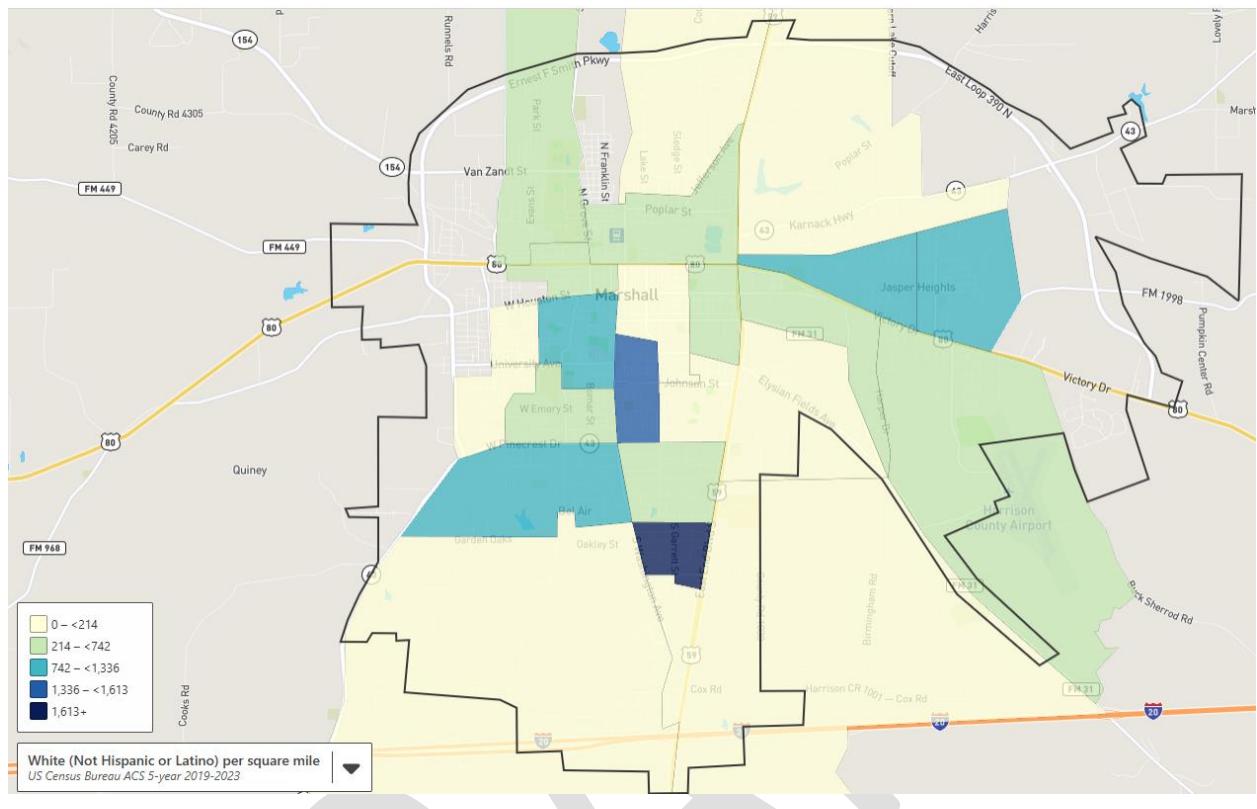
Are any of those racial or ethnic groups located in specific areas or neighborhoods in your community?

The minority population is concentrated near the core of the city, specifically west of US 59, south of Loop 390, and north of Pinecrest. North and South Washington create a division between predominantly African American and predominantly Hispanic neighborhoods. With the exception of two pockets, the overall area is primarily composed of low- to moderate-income households. Most of the housing in this area was developed between 1935 and 1945, with over 85% consisting of single-family homes. Consequently, the majority of racial and ethnic minorities reside in single-family dwellings that are at least 80 years old. The area south of Pinecrest is almost exclusively owner-occupied, while the area north of Pinecrest has a rental occupancy rate ranging from 15% to 70%. In areas with sufficient rental units to calculate rent as a percentage of income, all exceed 30%, with those north of University and east of Washington reaching as high as 45% of income. The median owner costs as a percentage of income range from 15% to 25%. The core area of the African American population has been changing since 2010, as more African Americans relocate to more recently developed neighborhoods, while non-Hispanic whites are migrating into predominantly African American, older areas.









NA-35 Public Housing – 91.205(b)

Introduction

The Marshall Housing Authority (MHA) has maintained two public housing developments and manages 615 Housing Choice Vouchers. However, the public housing developments are in the process of being converted to Section 8 Housing Choice Voucher units. Poplar Apartments is available to all qualified applicants, while Oak Leaf Village is designated for elderly and disabled residents and will continue to serve this population. Additionally, the MHA is collaborating with the U.S. Department of Veterans Affairs to provide supportive housing with case management services for veterans experiencing homelessness.

Totals in Use

	Certificate	Mod-Rehab	Public Housing	Program Type					
				Vouchers			Special Purpose Voucher		
				Total	Project-based	Tenant-based	Veterans Affairs Supportive Housing	Family Unification Program	Disabled *
# of units vouchers in use	0	0	74	841	226	655	0	0	0

Table 22 - Public Housing by Program Type

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

Data Source: PIC (PIH Information Center)

Characteristics of Residents

	Certificate	Mod-Rehab	Public Housing	Program Type				
				Vouchers			Special Purpose Voucher	
				Total	Project-based	Tenant-based	Veterans Affairs Supportive Housing	Family Unification Program
Average Annual Income	0	0	13,460	12,939	0	12,759	0	0
Average length of stay	0	0	3	3	0	3	0	0

	Certificate	Mod-Rehab	Public Housing	Program Type					
				Vouchers			Total	Project-based	Tenant-based
				Veterans Affairs Supportive Housing	Family Unification Program				
Average Household size	0	0	1	2	0	2	0	0	0
# Homeless at admission	0	0	0	0	0	0	0	0	0
# of Elderly Program Participants (>62)	0	0	42	41	0	38	0	0	0
# of Disabled Families	0	0	11	97	0	96	0	0	0
# of Families requesting accessibility features	0	0	69	489	0	477	0	0	0
# of HIV/AIDS program participants	0	0	0	0	0	0	0	0	0
# of DV victims	0	0	0	0	0	0	0	0	0

Table 23 – Characteristics of Public Housing Residents by Program Type

Data Source: PIC (PIH Information Center)

Race of Residents

Race	Certificate	Mod-Rehab	Public Housing	Program Type					
				Vouchers			Total	Project-based	Tenant-based
				Veterans Affairs Supportive Housing	Family Unification Program	Disabled *			
White	0	0	28	48	0	46	0	0	0
Black/African American	0	0	40	441	0	431	0	0	0

Race	Certificate	Mod-Rehab	Public Housing	Program Type								
				Vouchers			Total	Project -based	Tenant -based	Special Purpose Voucher		
				Veterans Affairs Supportive Housing	Family Unification Program	Disabled *						
Asian	0	0	0	0	0	0	0	0	0	0	0	
American Indian/Alaska Native	0	0	1	0	0	0	0	0	0	0	0	
Pacific Islander	0	0	0	0	0	0	0	0	0	0	0	
Other	0	0	0	0	0	0	0	0	0	0	0	

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

Table 24 – Race of Public Housing Residents by Program Type

Data Source: PIC (PIH Information Center)

Ethnicity of Residents

Ethnicity	Certificate	Mod-Rehab	Public Housing	Program Type								
				Vouchers			Total	Project -based	Tenant -based	Special Purpose Voucher		
				Veterans Affairs Supportive Housing	Family Unification Program	Disabled *						
Hispanic	0	0	4	12	0	12	0	0	0	0	0	
Not Hispanic	0	0	65	477	0	465	0	0	0	0	0	

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

Table 25 – Ethnicity of Public Housing Residents by Program Type

Data Source: PIC (PIH Information Center)

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

There are 50 units at Oakley Apartments for seniors, 4 of which are accessible. All are occupied with a waitlist of 17 which includes 12 elderly/disabled and 1 homeless individual. Poplar has 24 units, all occupied with a waitlist of 3 with one being homeless. There are 2 accessible units. There are a total of 655 Housing Choice Vouchers with 343 on the waitlist, including 3 survivors of domestic abuse/violence, 53 elderly/disabled, and 29 homeless.

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

There is an urgent need for more HCV units in general. Given the number of residents and voucher holders who are elderly and disabled, there is an urgent need for more accessible units. There is also need for the public housing units to have the approval for the conversion to Housing Choice Vouchers to be completed by HUD. Additionally, there is a need for more landlords to accept voucher holders and for more multi-family housing, especially Low Income Housing Tax Credit properties.

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

With 50% of Marshall's population being low- to moderate-income, there is a substantial need for more affordable housing units and more subsidies, particularly Housing Choice Vouchers. The waitlist that would fill more than half of the total HCV units indicates that the housing needs for the PHA compares closely to that of the population at large.

Discussion

Marshall Housing Authority is in the process of receiving final approval from HUD to convert its two apartment developments into Housing Choice Voucher units. There is a shortage of HCVs in Marshall as well as a shortage of other subsidized units such as LIHTC properties and general affordable rental housing. The HCV waitlist of more than half the total number of existing vouchers indicates the need. The number of elderly/disabled and homeless on the wait lists is alarming as these are the most fragile populations in need of immediate housing.

NA-40 Homeless Needs Assessment – 91.205(c)

Introduction

The City of Marshall conducted a Point in Time (PIT) and Housing Inventory Count (HIC) survey in January 2025. The results of the surveys included unsheltered homeless individuals, those residing in a general population shelter, men living in a sober living and permanent supportive housing facility, and female youth who are wards of the state residing in a group facility. There are 17 beds available for men, 8 beds for youth, and 7 general population beds across three facilities. The general population shelter is currently closed but is expected to reopen once renovations are completed and occupancy permits are obtained. There is a pressing need for additional shelter beds, particularly for families with children and for youth aging out of foster care.

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):

There are no reliable statistics on the number of individuals becoming homeless or exiting homelessness each year. Among the unsheltered individuals interviewed, one couple was experiencing homelessness for the first time but had been without stable housing for approximately 2.5 years, while another couple had previously been homeless and had now been without shelter for four years. The men residing in the sober living facility had experienced homelessness for periods ranging from three months to 15 years, with only 4 out of the 18 individuals being homeless for the first time. Among the 18 men in the sober living facility and one of the unsheltered adults, it was reported that they had a mental health disorder. Additionally, seven of the men in the sober living facility and six of the unsheltered individuals interviewed reported having a physical disability. When asked about HIV-related illnesses, three individuals did not respond, one answered and the remaining individuals were unsure. This highlights a significant need for accessible testing, education, and access to pre-exposure prophylaxis (PrEP) medication.

Nature and Extent of Homelessness: (Optional)

Race:	Sheltered:	Unsheltered (optional)
White	19	14
Black	9	2
Ethnicity:	Sheltered:	Unsheltered (optional)
Hispanic	4	1

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

Currently, there are no facilities or housing assistance programs available for families with children, particularly for families of veterans. According to the Marshall Independent School District, there were 144 homeless children attending school during the 2023-2024 academic year. The U.S. Department of Education's EDFacts report for the 2020-2021 academic year indicated that one-third of the students' families were living doubled-up with other families, one-third were unsheltered, and the remaining families were sheltered or residing in motels. While there is no information on the number of families represented by the 144 students, it is clear that all of these families require housing assistance. Marshall is home to 1,262 veterans. The 2025 Point In Time Count (PIT) identified six veterans among the 27 interviews conducted. Additionally, six unsheltered individuals who were observed but not interviewed may also be veterans. If we assume that they are, then one-third of the adult homeless population consists of veterans in need of housing assistance.

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

Based on the 2025 Point-in-Time (PIT) count, three-fourths of the homeless population is white, with less than 10% identifying as white Hispanic. One-fourth of the population is African American. In comparison, the city-wide demographic consists of 40% African American, 33% white, 23% Hispanic, and 4% classified as other. The unsheltered population is predominantly white, with only two of the 16 individuals being African American and none identifying as Hispanic. Among the adult sheltered population, seven of the 20 individuals are African American, 13 are white, with two of the white individuals identifying as Hispanic.

Describe the Nature and Extent of Unsheltered and Sheltered Homelessness.

Currently, with no general population shelters available in Marshall, there are no options for homeless individuals who are not seeking assistance at a sobriety center or who are state wards as youth.

Discussion:

Addressing homelessness has become a priority for the CDBG staff in Marshall. In January 2025, Marshall conducted a Point in Time and Housing Inventory Count for the Homeless Continuum of Care program for the first time in many years. Additionally, Program Year 2024 marked the inaugural allocation of Marshall CDBG funds specifically aimed at assisting the homeless population. Discussions with former shelters, East Texas Open Door, the Marshall Housing Authority, and the Twelve-Way Residential Treatment Facility indicate a significant need for housing solutions that extend beyond traditional shelters. However, there remains a critical demand for emergency shelters to stabilize individuals, enabling them to move into transitional housing options such as residential treatment, halfway housing, and group housing for youth aging out of foster care. The ultimate goal is to provide access to permanent supportive housing or permanent independent housing.

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

Introduction:

The primary special needs populations in Marshall include the elderly, children, victims of domestic violence, individuals with substance use disorders, and those with physical or mental disabilities or illnesses. Key areas that need to be evaluated and addressed to promote equity in the community are healthcare, economic opportunities, support services, and housing. Due to the somewhat rural nature of Marshall and Harrison County, economies of scale are often insufficient to support many of the necessary services, particularly for special needs populations. CDBG funding is a crucial resource for bridging this funding gap.

Describe the characteristics of special needs populations in your community:

Elderly: Marshall has 3,100 elderly individuals residing in households, of whom 973 live alone, 2,109 live with other family members, and 18 live with non-relatives. Additionally, 328 elderly individuals reside in group quarters. Among seniors, two-thirds (65.8%) of homeowners living alone and 89.4% of renters living alone belong to low- to moderate-income households. Nearly two-thirds (61%) of seniors in households have one or more disabilities; however, there is no readily available information on the number of those with disabilities who live alone. Access to healthy food is crucial for everyone, but it is especially important for the elderly. Notably, 83.1% of elderly individuals live more than half a mile away from sources of healthy food, and of these, 31.7% are more than one mile away from such access. Many of the elderly have no vehicle, decreasing the access to healthy food.

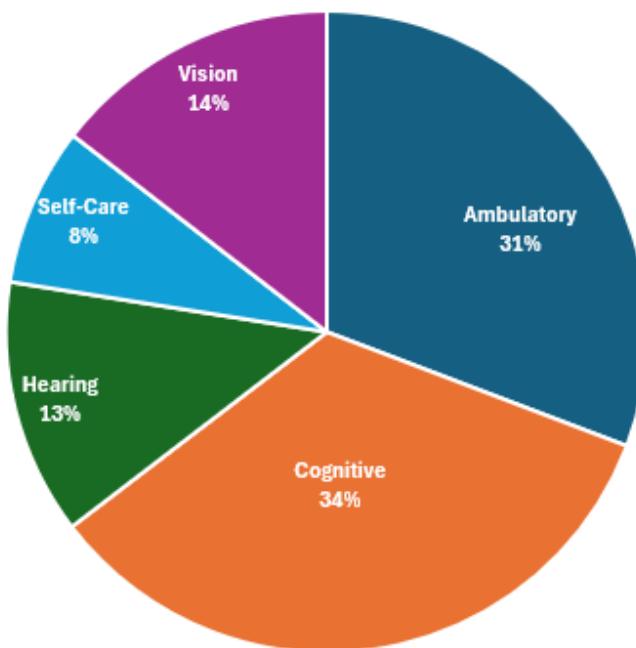
Children: There are 5,897 children residing in Marshall, with 529 living with a grandparent as the primary householder. Nearly half (2,518) of these children live below the poverty line. The ACS does not report any of the 1,416 children under the age of 5 as having a disability; however, 691 (11.7%) of children aged 5 to 17 have one or more disabilities. Children represent 16.6% of all individuals with disabilities. Additionally, three-fourths (78.2%) of all children live at least half a mile away from access to healthy foods, and among this group, 30.3% live more than a mile from such access. As with the elderly, children in households with no vehicle are even more vulnerable to the less able to access to healthy food.

Victims of Domestic Violence: Domestic violence is on the rise throughout Texas, and Harrison County, where Marshall is located, is no exception. According to the Texas Council on Family Violence, there were 247,896 family violence offenses reported in Texas in 2023, compared to 190,851 in 2018. In Marshall, there were two domestic violence-related deaths in 2023: a woman who was stabbed by her boyfriend and a man who was shot by his wife. The FBI Crime Data Explorer provides statistics on various crimes by city for the past two, five, and ten years. The latest update to this data was completed in January 2025 and indicates that, over the previous

five years, there were 75 victims of aggravated assault related to domestic violence, not including fatalities. The breakdown of these victims is as follows: spouse (8), ex-spouse (4), common-law spouse (8), boyfriend/girlfriend (53), and ex-boyfriend/girlfriend (2).

Disabled: Nearly one in five residents in Marshall has one or more disabilities, with many individuals experiencing multiple disabilities. Approximately 20% (4,277) of those with a disability in Marshall lack health insurance. This figure includes 27.9% of working-age individuals—ages 18 to 64—who are uninsured. Among seniors aged 65 and older, who are eligible for Medicare, only 2.5% of those with disabilities are uninsured. The average annual earnings for individuals with disabilities is \$38,650, which is \$8,000 less than the earnings of those without disabilities. During the 2021-2022 school year, the Marshall Independent School District reported that 254 students were enrolled in Section 504 programs and 359 were enrolled under the Individuals with Disabilities Education Act. Of these students, 224 were chronically absent from school.

Types of Difficulty Reported



Health: A 2022 survey conducted by the Centers for Disease Control and Prevention (CDC) reported concerning health statistics among adults in Marshall. The survey revealed that 15.3% of adults in the area experience poor physical health, while 26.1% rated their general health as fair or poor. Additionally, one-fourth of the adults reported being diagnosed with depression, and 20.4% indicated experiencing poor mental health. The Substance Abuse and Mental Health Services Administration (SAMHSA) conducted the 2020 National Survey on Drug Use and Health

for Texas State Region 4, which includes Marshall. This survey found that 4.12% of adults have a serious mental illness, while 16.91% have any level of mental illness, and 12.50% received treatment services in the previous year. Furthermore, the 2022 CDC survey indicated that 15.9% of adults reported issues with binge drinking. In contrast, the SAMHSA survey estimated that 23.14% of individuals experienced episodes of binge drinking in the previous month, with 39% of those being youths aged 12 to 19. SAMHSA also estimated that 2.83% of individuals aged 12 years and older used illicit drugs other than marijuana in the previous month. Annual averages from 2016 to 2018 indicated that 2.36% of those aged 12 and older have a substance use disorder. Alarmingly, more than 90% of individuals with a substance use disorder needed but did not receive treatment at a specialty hospital.

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

Marshall faces a significant shortage of subsidized housing units to adequately serve all low-income households, including the elderly and individuals with disabilities or health issues, such as mental health and substance use disorders. Approximately 1,000 seniors with low to moderate incomes are living alone, with about one-third of them having one or more disabilities. Although there are 1,214 subsidized housing units in Marshall, only 60 are designated for the elderly and disabled through the Marshall Housing Authority, and an additional 64 units are available in a Low-Income Housing Tax Credit property that targets both groups. Currently, 83% of HUD-assisted units are occupied by seniors aged 62 and older, while 26% are occupied by individuals with disabilities, many of whom are also elderly. Furthermore, there are 2,235 residents aged 18 to 64 with disabilities. The average waiting period for HUD-assisted housing is eight months.

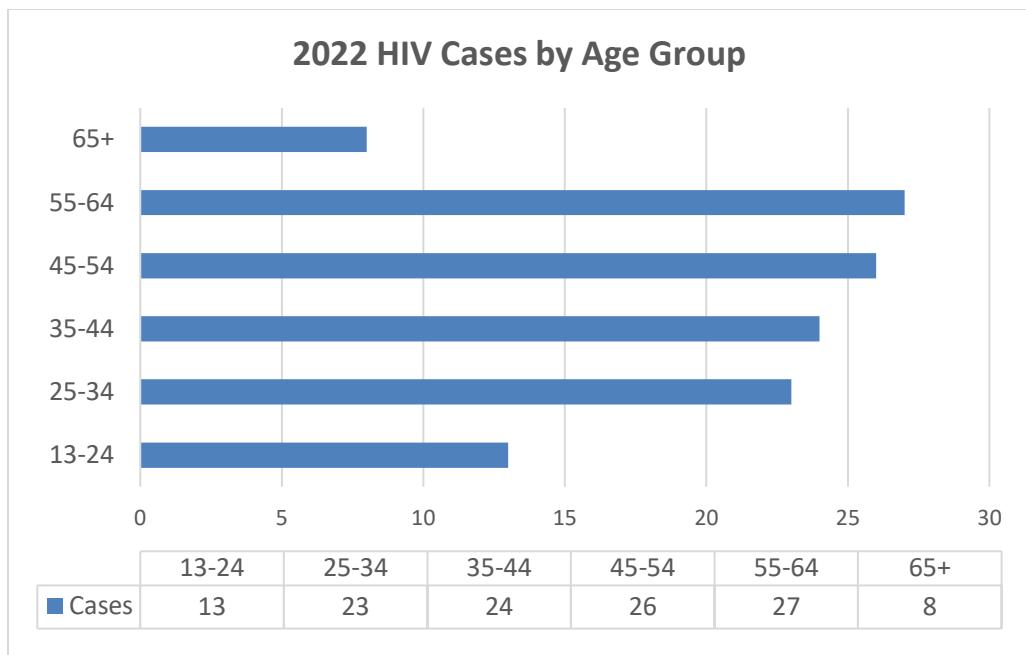
There is a significant need in Marshall for affordable multi-family housing, permanent supportive housing, rapid rehousing, and transitional housing. The Marshall Housing Authority is transitioning its two public housing developments to utilize Housing Choice Vouchers. This change will provide residents with greater flexibility to use their vouchers at these developments or elsewhere throughout the city. Currently, Twelveway offers options for men with substance use disorders, including a transitional housing component that features recovery classes and support. Additionally, graduates may remain in the facility under a permanent supportive housing arrangement. There is potential for Twelveway to expand its services to include transitional and permanent supportive housing for both men and women who do not have substance use disorders. East Texas Open Doors operates a therapeutic foster care program that currently houses girls in one of its four homes. The plan is to open an adjacent group home for young women aging out of foster care, with a longer-term goal of replicating their programs for boys and young men. Despite the initiatives from the Marshall Housing Authority, Twelveway,

and East Texas Open Doors, there will still be a substantial shortage of affordable housing for disabled and elderly renters.

Supportive services are essential for populations with special needs, whether they require housing assistance or are already adequately housed. Communities in Schools (CIS) supports at-risk students, including those with disabilities, by helping them remain in school, attend classes, and improve their grades and behavior while accessing social services. However, the demand for these services exceeds the capacity of CIS. Health care is a critical need for all individuals, particularly those with underlying conditions or without access to healthy food. Marshall is designated as a Health Professional Shortage Area for Primary Care and Mental Health professionals making access to proper medical care more difficult for everyone, especially those with low incomes or no insurance. Healthy food is vital for the wellbeing of all ages, especially children and seniors. Three-fourths of Marshall's population reside more than one-half a mile from access to healthy food. The distance to shopping venues is vitally important for those individuals without a vehicle. A partnership between the City of Marshall and East Texas Council of Governments has made a rural fixed bus system possible. Though designated as a fixed route system with 3 routes, the system is flexible and will pick up riders within three-fourths of a mile from the route when the rider has made a reservation. The routes stop at major locations such as grocery stores, post office, colleges, Greyhound bus station, Amtrak Station, big box stores and the mall. Round trip fares are \$1 with 50% discount for seniors, students, and persons with disabilities. The system also offers demand-response service within Marshall and Harrison County.

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

Marshall is not located within an Eligible Metropolitan Statistical Area. However, data for Harrison County is accessible through AIDSVu at Emory University's Rollins School of Public Health and Center for AIDS Research. According to the most recent data reported by AIDSVu (2022), Harrison County, where Marshall is situated, has recorded 121 HIV cases, which equates to 207 cases per 100,000 population. Of these cases, 85 are male and 36 are female. African Americans, with 72 cases, account for 60% of the total, while non-Hispanic whites represent 24 cases, Hispanics account for 10 cases, and individuals of multi-racial backgrounds comprise 15 cases.



In 2022, six individuals were diagnosed with HIV, and four were connected to HIV care services. Among all individuals living with HIV, 82 received care.

Social determinants of health encompass factors such as education, income, employment, health insurance, and housing cost burden. In many of these health determinants, individuals living with HIV fared as well as or better than the overall county population. The median income for this group was \$63,427, which is \$2,600 less than the county-wide median. Additionally, the percentage of uninsured individuals under the age of 65 was 19.4%, which is 2.1 percentage points higher than the county average. For all other health determinants, individuals with HIV showed more favorable outcomes compared to the overall county statistics. Notably, the percentage of those living with a severe housing cost burden was 12.2%, approximately half of the county figure of 24.25%.

Despite the limited availability of services in Harrison County, 71.3% of individuals living with HIV received care in 2022, and four out of the six individuals diagnosed that year were successfully linked to HIV care.

If the PJ will establish a preference for a HOME TBRA activity for persons with a specific category of disabilities (e.g., persons with HIV/AIDS or chronic mental illness), describe their unmet need for housing and services needed to narrow the gap in benefits and services received by such persons. (See 24 CFR 92.209(c)(2) (ii))

Not applicable

Discussion:

Although there are gaps in services available to the special needs population, particularly in areas such as transportation and specialized healthcare, Marshall offers more public and health services than most other cities of its size. The demand for services and housing exceeds the current capacity and availability due to the city's size. However, specialized services, such as HIV-specific assistance, are not available locally but can be accessed in Longview to the west and Shreveport to the east, both approximately 30 minutes away. The new flexible fixed-route bus service is enhancing access to existing services and amenities. Additionally, new collaborations between the City's CDBG Coordinator and homeless, housing, and service agencies are improving information sharing and public awareness.

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

Describe the jurisdiction's need for Public Facilities:

The primary public facility needs have focused on enhancing parks and community centers. Over the years, both types of facilities in low-income neighborhoods have suffered from neglect. However, significant progress has been made in the past two to three years to address these issues. Private funds and CDBG resources have been utilized to transform George Washington Carver Elementary School into the George Washington Carver Community Center. Anointed Grace Ministries purchased the property, and in PY 2023 CDBG funds were allocated to improve the recreational features of the center, including renovations to both indoor and outdoor basketball courts and the installation of state-of-the-art playground equipment. In PY 2024, the kitchen was renovated, and new commercial appliances were installed to better serve the community. Additionally, a new HVAC system was installed for the basketball court. In the coming years, further improvements will be made primarily with private funds. In PY 2024, CDBG funds were allocated to upgrade and reconstruct one of the most neglected parks in one of the lowest-income areas.

Moving forward into this five-year period, the most essential facilities needed are a homeless shelter and a small business incubator that includes a job training site. Minor improvements are warranted for the two parks in Westside. As the George Washington Carver Community Center expands its services and offerings, there may be additional facility needs. Community surveys indicate that community centers, senior centers, and facilities for economic development activities are of the highest priority.

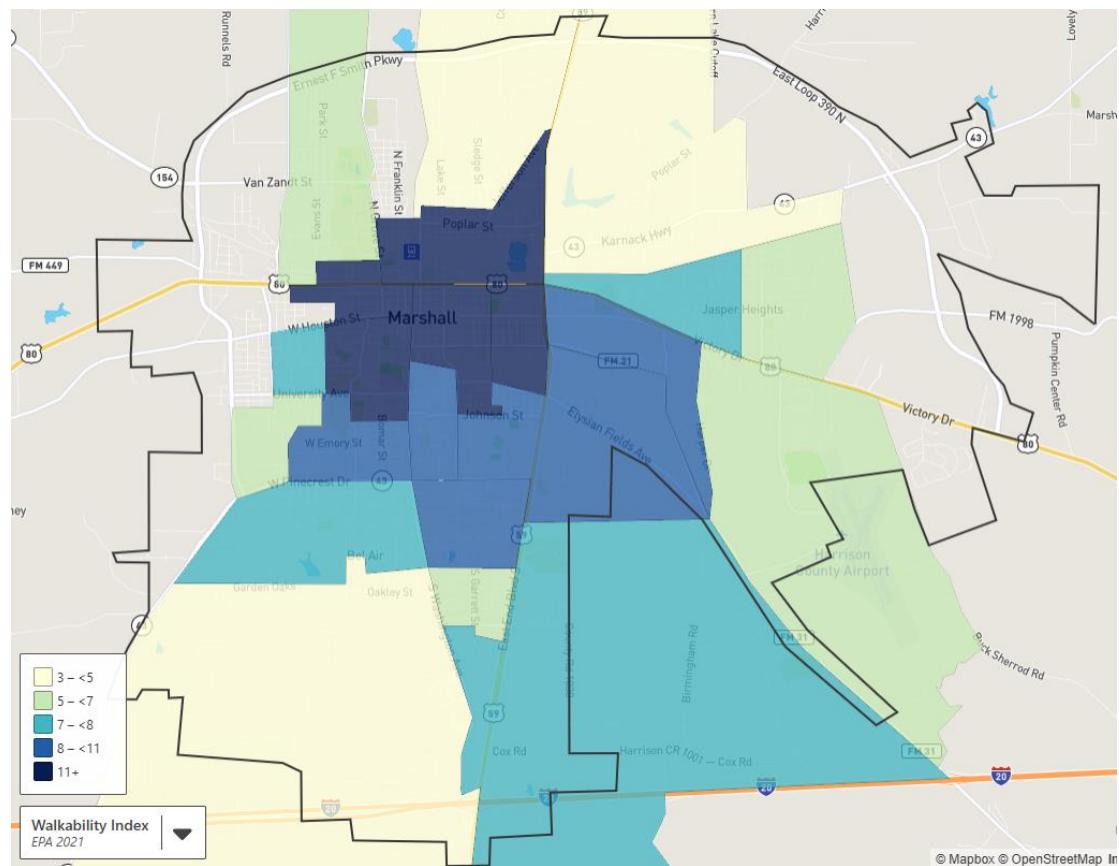
How were these needs determined?

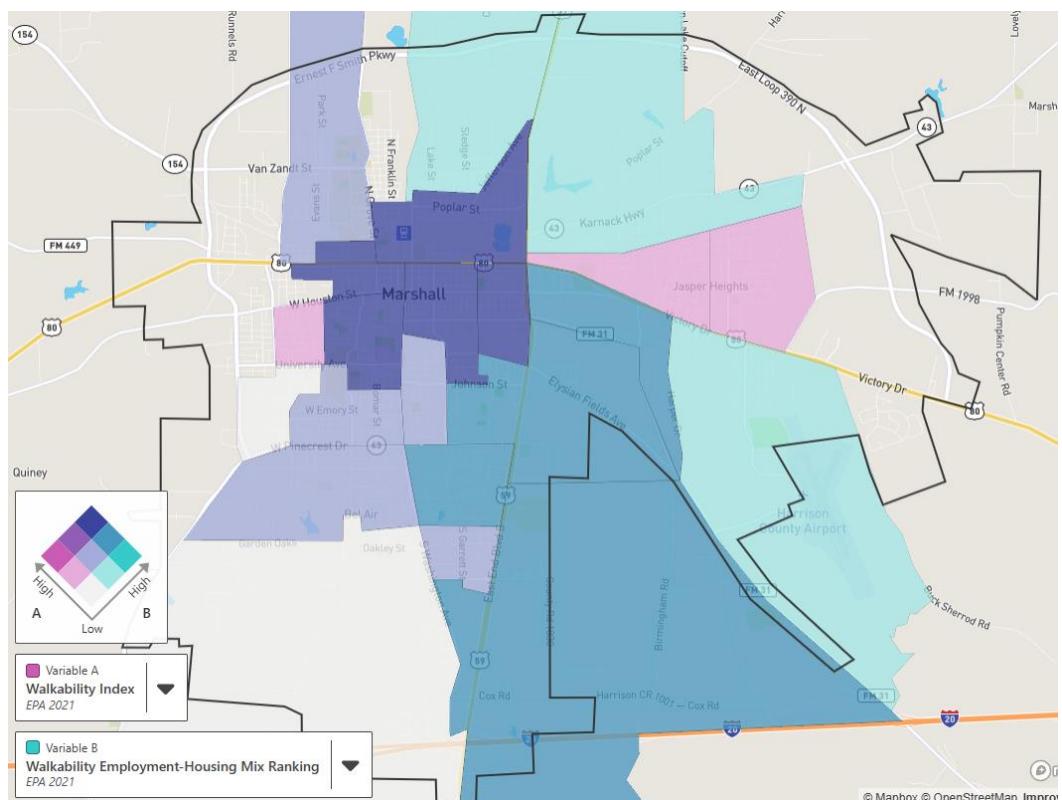
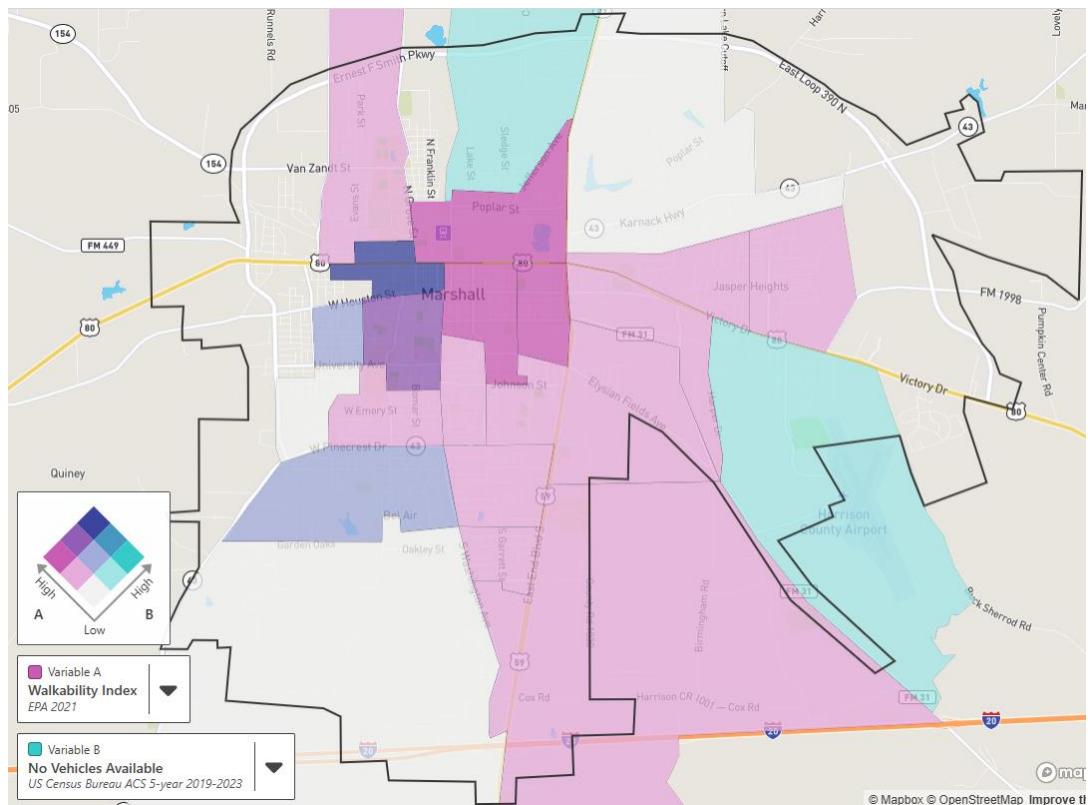
These needs were identified through surveys and research conducted for the Planning Department's 2043 Comprehensive Plan, as well as surveys completed for the PY 2025-2029 Consolidated Plan. Additionally, community-based research into the needs and solutions for a community facility prompted the purchase of the elementary school.

Describe the jurisdiction's need for Public Improvements:

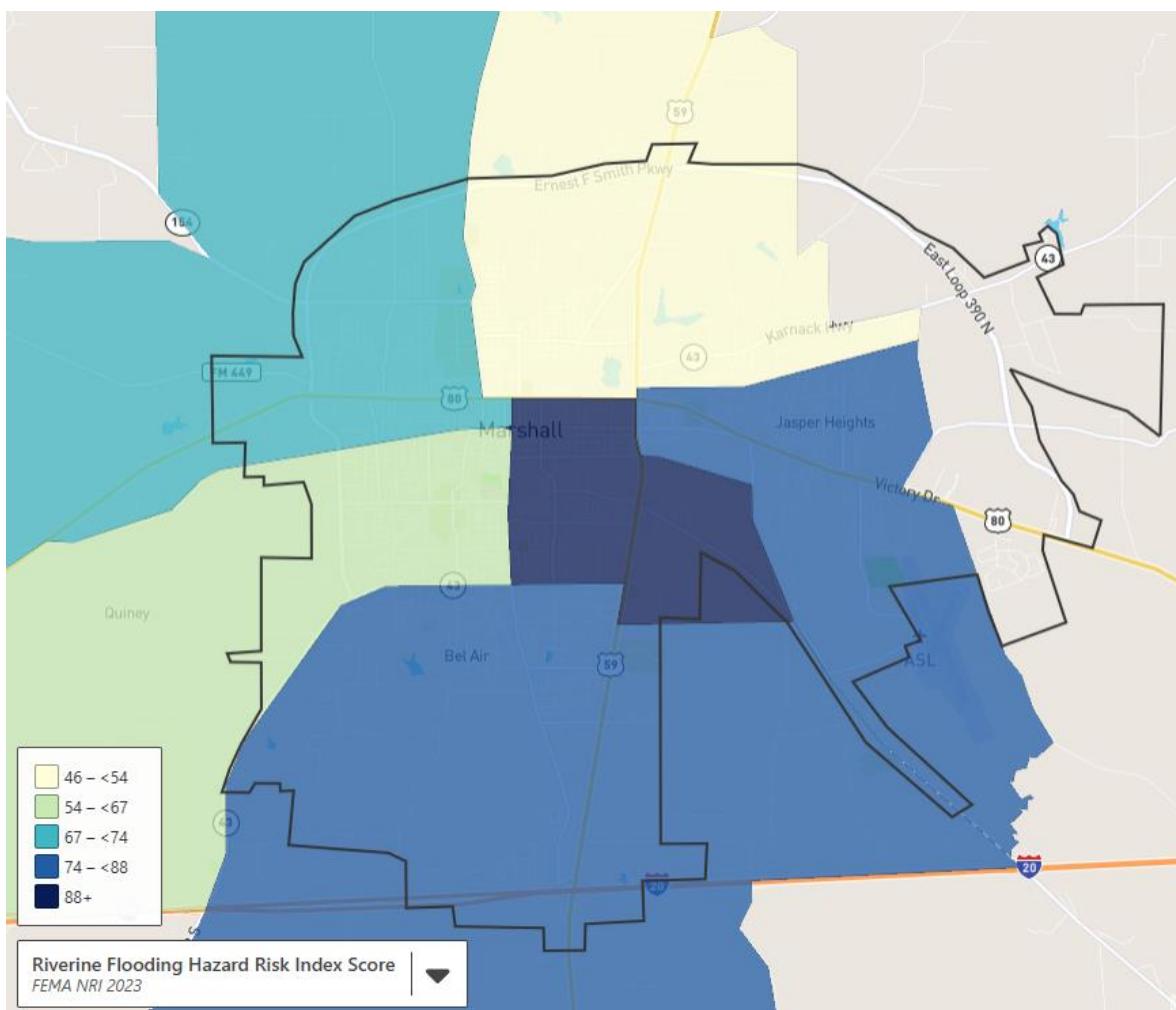
Mobility and drainage are the primary public improvement issues in Marshall. Mobility encompasses three key aspects: the availability of public transit, the quality of streets, and the presence and condition of sidewalks. According to the community survey, the highest priority need is road reconstruction, followed by improvements to water and sewer systems, and the development of sidewalks. The current street improvement program includes the reconstruction of 16 streets and the replacement of the overlay on an additional 16 streets. There is a significant shortage of sidewalks in Marshall, particularly those that are ADA-compliant, and 12.3% of

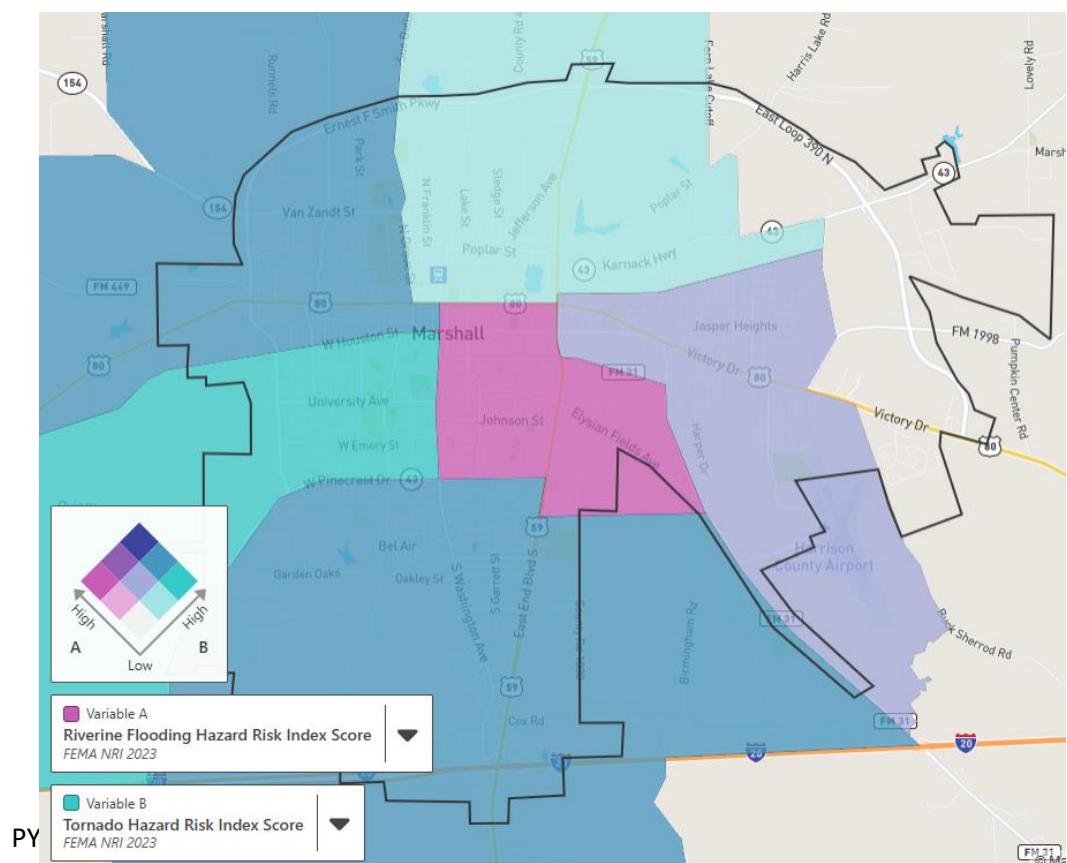
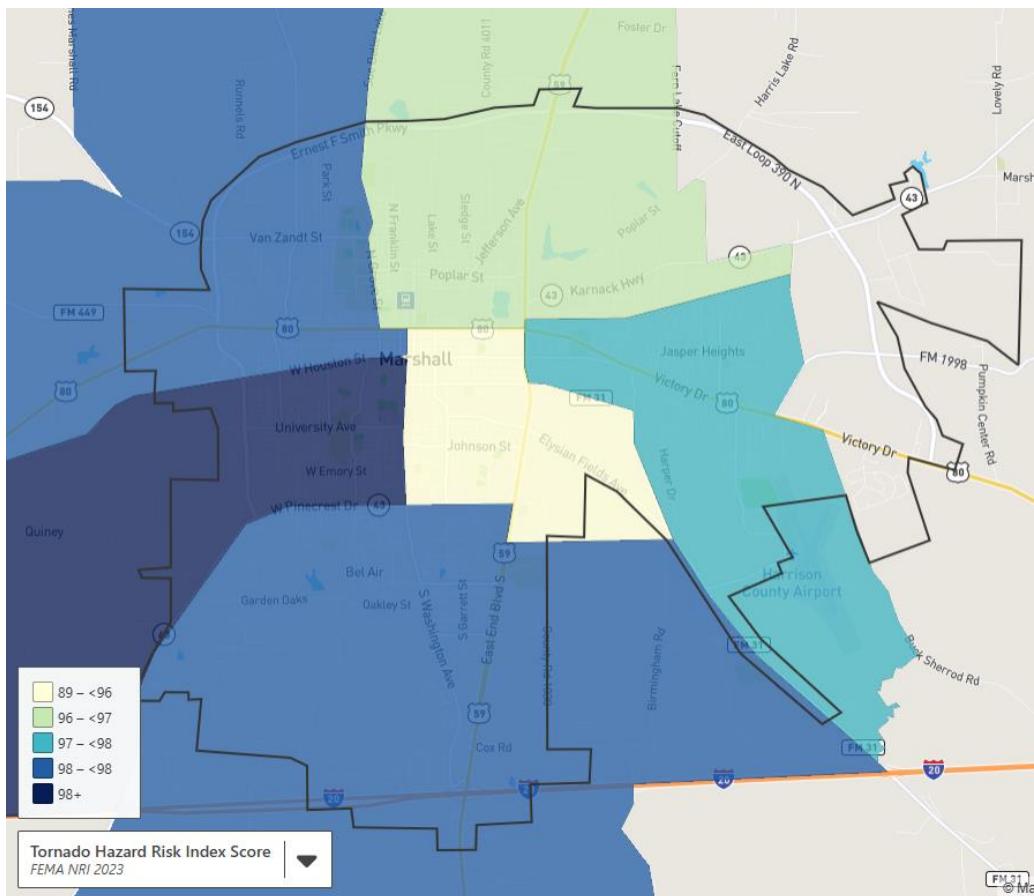
households lack a vehicle, necessitating walking to most destinations. The Environmental Protection Agency (EPA) produces a walkability index for jurisdictions and subareas down to the block group level. The index ranges from 1 to 20, with lower values indicating less walkable locations. Overall, Marshall has a walkability index of 7, with many areas outside the central city having indices ranging from three to eight. Public transportation options in Marshall are limited, with GOBUS operating only three vehicles and three routes. Consequently, the index for walkability in proximity to transit is one out of twenty for the city as a whole.





The fourth highest-ranked need identified in the survey is drainage, particularly in the older neighborhoods. The Federal Emergency Management Agency (FEMA) has developed an index to assess environmental hazard risks associated with various natural and man-made threats. This index ranges from zero, indicating no risk, to 100, representing the highest level of risk. The central area of Marshall has the highest risk score of 88 out of 100 for riverine flooding, while the southern and eastern areas of the city also have high risk scores ranging from 74 to 87. However, this score may be misleading, as flooding can occur due to heavy rainfall even without proximity to rivers or creeks. The FEMA Hazard Risk Index does not include a measurement for heavy rains or other situations that can cause flooding. One proxy for heavy rainfall is tornadoes. In some areas of Marshall, the very high tornado risk score is higher than the score for flooding risk. The combined score for riverine flooding and tornadoes is highest in the northwest and south, while the central area has the highest risk score for riverine flooding, and the west-southwest has the highest occurrences of tornadoes.





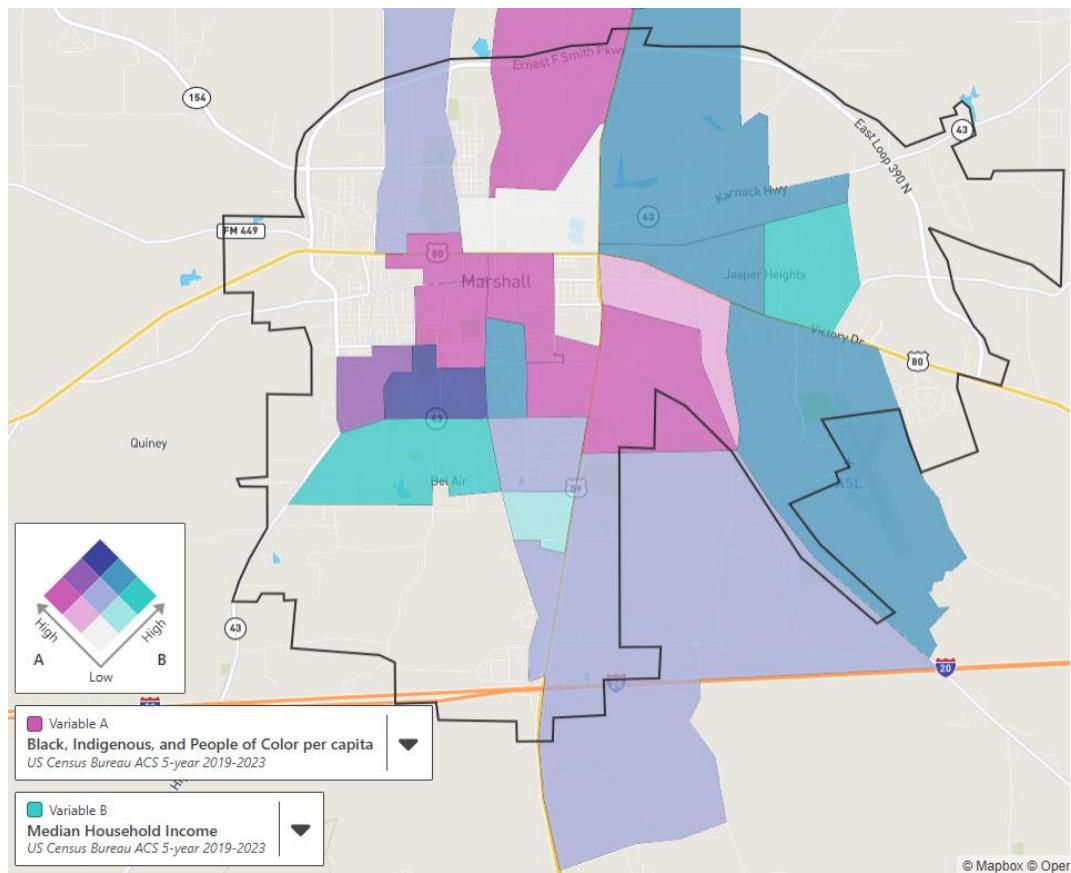
How were these needs determined?

The infrastructure needs were determined through a combination of information from the latest Comprehensive Plan, resident surveys, in-house studies for prioritizing capital investments, and data provided by EPA and FEMA.

Describe the jurisdiction's need for Public Services:

Considering the size of Marshall, the community supports several public service agencies. However, the need for greater capacity and additional types of services is evident. The Centers for Disease Control and Prevention (CDC) and the Agency for Toxic Substances and Disease Registry (ATSDR) developed a Social Vulnerability Index (SVI) designed to identify and quantify a community's social vulnerability to various hazards. The Social Vulnerability Index, when compared with the state, represents the relative vulnerability of a county or census tract ranked against all other similar geographies within Texas. An index score near zero indicates that the area has significantly lower vulnerability than all other areas within Texas, while a score near one indicates it has one of the highest levels of vulnerability in the state. A high Social Vulnerability Index signifies a need for either more social support services or better access to existing services. Marshall's census tracts have a Social Vulnerability Index ranging from 0.63 to 0.94. For the most part, the census tracts west of North and South Bolivar exhibit the highest indices across all social and demographic categories. These indices illustrate the need for improved social services in areas with a high concentration of BIPOC residents, which coincides with regions of low median income. The map below illustrates the correlation between the BIPOC population and median household income. It should be noted that this comparison may contradict general assumptions in certain census tracts. For example, the census tract with one of the highest percentage of BIPOC residents also has the highest median income. However, in other areas of the city, a higher BIPOC percentage correlates with lower income, and vice versa.

The types of services required during times of crisis include housing assistance, transportation, employment support, food, medical care, and mental health counseling, among others. Marshall requires additional emergency rental and utility assistance (sustenance payments), transportation within the city and to other regions of the state or nation, medical care, and mental health support. Mental health services was ranked with the highest priority need for social services in the survey for the Consolidated Plan.



How were these needs determined?

The social service needs were determined based on the results of the public surveys, capacity of agencies applying for CDBG funding, the Social Vulnerability Index, and a comprehensive review of existing agencies.

Housing Market Analysis

MA-05 Overview

Housing Market Analysis Overview:

According to the 2019-2023 American Community Survey (ACS), Marshall has a total of 9,754 housing units, of which 8,272 (84.8%) are occupied and 1,482 (15.2%) are vacant. More than half of the vacant units remain unoccupied for unspecified reasons, with many being abandoned and in need of demolition. Currently, there is no mechanism in place in Marshall to demolish these abandoned properties and construct new affordable replacement units. While Marshall is not eligible to become an entitlement jurisdiction for HUD's HOME Investment Partnership Program (HOME), private entities can apply to the State for HOME funds to develop affordable housing in the area. Ongoing discussions aim to identify and encourage eligible agencies that possess the vision and capacity to become non-profit Community Housing Development Organizations (CHDOs), thereby securing State HOME funds and facilitating the construction of infill or cluster housing.

The latest ACS estimated that there were 65 vacant homes for sale and 308 vacant homes for rent. A survey conducted in February 2025 on homes.com indicated that there were 86 dwellings available for sale, along with an undetermined number of rental units within two general population apartment complexes and one senior living complex. The ACS estimated that 60% of the occupied units are owner-occupied, while 40% are renter-occupied, and 77% of the housing stock consists of single-family homes. The age of the housing stock in Marshall is a primary concern, as 22% of the homes were constructed before 1950, and a total of 67% were built before the ban on lead-based paint. Only 15% of the current housing stock was constructed in the past 25 years. Marshall utilizes CDBG funds to support the rehabilitation of homes owned and occupied by low- to moderate-income residents, the majority of whom are elderly or disabled. The demand for rehabilitation exceeds the available public and private funding.

More than half of the renter-occupied units are single-family homes, yet there is a pressing need for more multi-family units, particularly for single-person households. Currently, there are 1,263 single-person renters, but only 664 efficiency and one-bedroom units available as rentals. Additionally, only 126 rental housing units are located in developments with 20 or more units. The high costs of land and construction render single-family homes or small apartment complexes with efficiency or one-bedroom units economically unfeasible.

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

Introduction

Marshall's housing stock is predominantly composed of single-family homes, with over three-fourths of the units being single-family detached. Only 1.29% of the units are located in apartment complexes with more than 20 units per property. More than 90% of the housing units feature two or more bedrooms, which is expected given the prevalence of single-family detached homes. Consequently, more than half of Marshall's renters reside in single-family units, and 80% occupy units with two or more bedrooms. However, 58.2% of renter households consist of only one or two residents, suggesting that approximately 1,922 renters may be living in units that are larger than necessary or beyond their financial means.

The tables below have been updated from the pre-populated 2016-2020 ACS to the 2019-2023 time frame. Where the original tables use specially computed values, the 2016-2020 information has not been updated.

All residential properties by number of units

Property Type	Number	%
1-unit detached structure	7,514	77.04%
1-unit, attached structure	32	0.33%
2-4 units	1,017	10.43%
5-19 units	599	6.14%
20 or more units	126	1.29%
Mobile Home, boat, RV, van, etc	466	4.78%
Total	9,754	100.00%

Table 26 – Residential Properties by Unit Number

Data Source: 2019-2023 ACS – updated from HUD prepopulated

Unit Size by Tenure

	Owners		Renters	
	Number	%	Number	%
No bedroom	0	0%	137	4.1%
1 bedroom	67	1.3%	527	15.9%
2 bedrooms	1,297	36.1%	1,373	41.5%
3 or more bedrooms	3,601	72.5%	1,270	38.4%

Table 27 – Unit Size by Tenure

Data Source: 2019-2023 ACS – updated from HUD prepopulated

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

According to the HUD Picture of Subsidized Housing and the National Housing Preservation Database, the Marshall Housing Authority manages 655 Housing Choice Vouchers (HCV) and 74 public housing units that are in the process of being converted to HCV units. Additionally, there are 226 project-based HUD Section 8 contracted units with no specific targeted population, as well as 15 HUD Section 202 units designated for individuals with disabilities. Eighty rental units receive multiple federal subsidies. Marshall also has 314 Low-Income Housing Tax Credit (LIHTC) units across four developments. One of these developments, consisting of 64 units, specifically targets elderly and disabled individuals, while another targets unspecified populations, and two do not target any special populations.

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

None of the subsidies are expiring within five years, nor are any income restrictions expiring within the next five years. It does not appear that any units will be lost from the affordable housing inventory for any other reason during the term of this Consolidated Plan.

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

The availability of housing units in Marshall does not adequately meet the needs of its population. The latest ACS indicates that 1,713 renters (51.8%) experience a housing cost burden exceeding 30% of their income, while 888 homeowners (17.9%) also face a cost burden of 30% or more. This mismatch in housing affordability is largely attributed to a shortage of smaller units. A domino effect occurs as the lack of smaller units forces single-person households into 2-bedroom units or larger, which are often unaffordable. Consequently, this situation pushes those who need and can afford a 2-bedroom unit into 3- or 4-bedroom units that are also not affordable. Currently, there are 1,263 single renters competing for only 137 efficiency units and 527 1-bedroom units. As a result, 599 of these individuals must rent larger units than they desire or can afford. This issue is further compounded by the fact that only 774 of the 1,297 2-bedroom units remain available for the 1,158 2-person and 3-person renter households. As each household is forced to rent a unit with more space than necessary, it is likely that they will incur an excessive cost burden. This affordability mismatch is exacerbated by the reality that most of the larger units are single-family homes, which rent for more per square foot than units in apartment complexes. One contributing factor to this mismatch is the 805 vacant units that are neither for sale nor for rent, nor are they sold or rented but not yet occupied.

Describe the need for specific types of housing:

There is a significant need for increased subsidized housing, either through federally funded projects or Low-Income Housing Tax Credit (LIHTC) properties. Single-person households represent the largest segment of the rental market, with twice as many households as there are appropriately sized housing units. Additionally, there is a demand for affordable housing for homeownership, particularly replacement housing for units that have been abandoned and are uninhabitable. Furthermore, there is a need for more multi-family housing options for single-person households. A substantial number of single-family units are owned and occupied by low-income households, many of whom are elderly. These homes require rehabilitation or, in some cases, demolition and reconstruction. Due to the age of the housing stock in Marshall, there are few units that comply with the Americans with Disabilities Act (ADA), and there are 3,151 households with at least one person living with a disability.

Discussion

The median age of the housing stock in Marshall is 73 years. Consequently, the majority of the units are single-family homes, with few efficiencies or one-bedroom apartments available. Over time, household sizes have decreased, and currently, 38.2% of renters are single individuals. There is a significant shortage of multi-family housing, particularly efficiencies and one-bedroom units. Additionally, there is a pressing need for more subsidized housing, especially privately-owned LIHTC properties. The areas north of University and west of SH-59 are the oldest in Marshall and contain the highest percentage of vacant units. Many of these properties are abandoned, partly because the heirs of the last owners are unable to obtain clear titles or have relocated from the area. As is common in many cities, there is a trend of migration toward the outskirts of the city and into the unincorporated areas of Harrison County. This movement is particularly evident among African Americans whose ancestors settled in the area north of University, as they are relocating to newer neighborhoods south of University. Hispanics and Whites are moving into the area, with some occupying the original units, others purchasing and renovating them, and some demolishing existing structures to redevelop the lots. Since 2000, more than 300 houses have been constructed in this area, primarily on in-fill lots where older homes have been demolished.

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

Introduction

Housing costs have risen significantly in recent years. The tables below provide information on the 2016-2020 ACS estimates, however the 2019-2023 estimates indicate that costs have increased more in the last three years than in the previous decade. While home values rose by 21% from 2009 to 2020, they increased an additional 27.4% between the 2016-2020 ACS and the 2019-2023 ACS, reaching a latest median of \$133,000. Similarly, median rents in the 2019-2023 ACS are now \$929, representing a 52% increase over the 2016-2020 estimates.

Cost of Housing

	Base Year: 2009	Most Recent Year: 2020	% Change
Median Home Value	86,000	104,400	21%
Median Contract Rent	550	611	11%

Table 28 – Cost of Housing

Data Source: 2000 Census (Base Year), 2016-2020 ACS (Most Recent Year)

Rent Paid	Number	%
Less than \$500	1,130	33.4%
\$500-999	1,950	57.7%
\$1,000-1,499	255	7.5%
\$1,500-1,999	30	0.9%
\$2,000 or more	0	0.0%
Total	3,365	99.6%

Table 29 - Rent Paid

Data Source: 2016-2020 ACS

Housing Affordability

Number of Units affordable to Households earning	Renter	Owner
30% HAMFI	595	No Data
50% HAMFI	1,575	670
80% HAMFI	2,795	1,830
100% HAMFI	No Data	2,534
Total	4,965	5,034

Table 30 – Housing Affordability

Data Source: 2016-2020 CHAS

Monthly Rent

Monthly Rent (\$)	Efficiency (no bedroom)	1 Bedroom	2 Bedroom	3 Bedroom	4 Bedroom
Fair Market Rent	\$800	\$840	\$1,104	\$1,335	\$1,500
High HOME Rent	\$800	\$840	\$1,104	\$1,335	\$1,500
Low HOME Rent	\$756	\$809	\$971	\$1,121	\$1,252

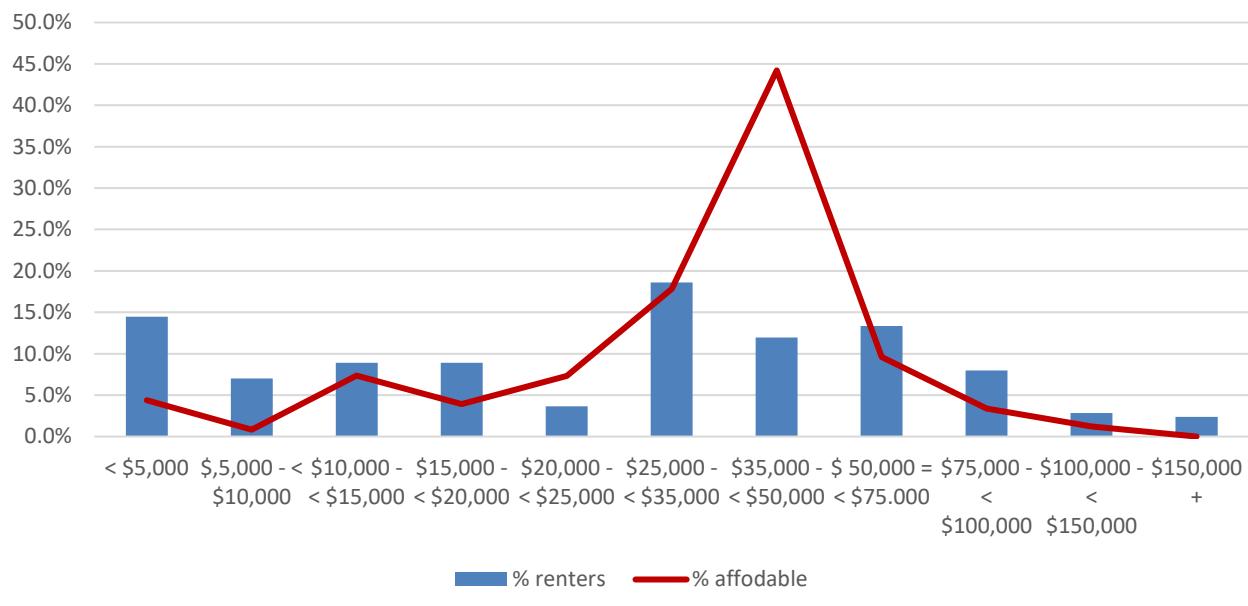
Table 31 – Monthly Rent

Data Source: HUD FMR and HOME Rents

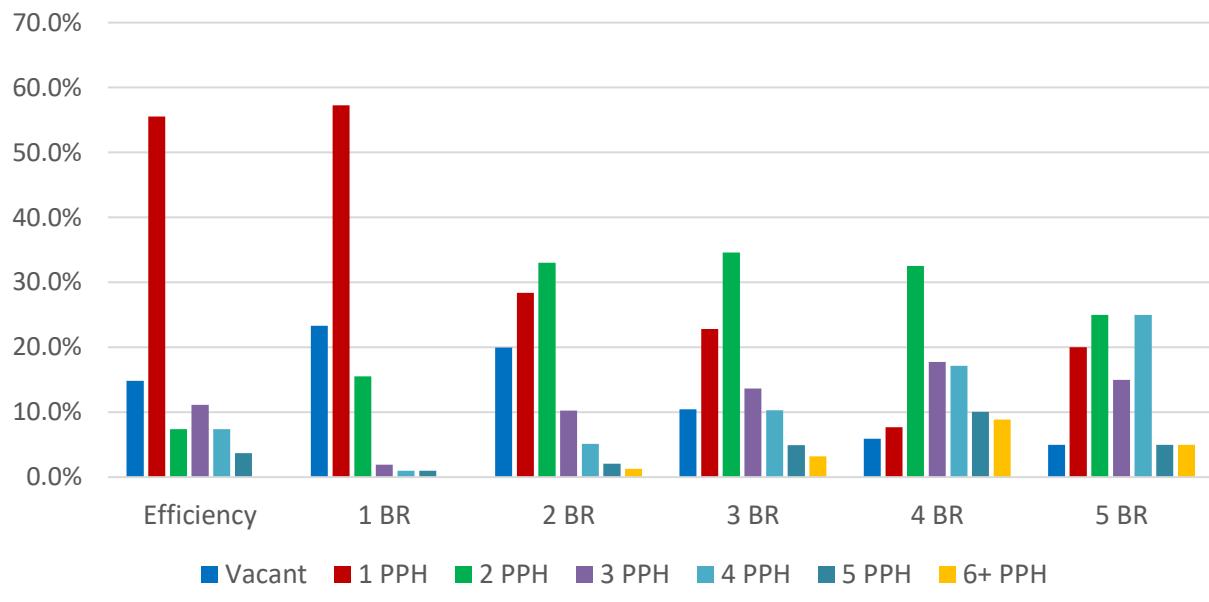
Is there sufficient housing for households at all income levels?

There is insufficient housing available for households across all income levels, particularly for renters in Marshall. Homeowners fare much better regarding excessive housing cost burdens; only 19% of owners experience a housing cost burden exceeding 30% of their income. More than half (54%) of homeowners do not have a mortgage, though 61% of those with an excessive housing cost burden are paying a monthly mortgage. Affordability is not the only issue; the number of vacant units that are not on the market or are designated for seasonal use also contributes to the overall housing shortage. Furthermore, the age of the housing stock in Marshall exacerbates costs for owners, even those without a mortgage, due to repair expenses and utility inefficiencies. The median age of housing in Marshall is 73 years, with only 14% constructed since 2000. The typical approach to alleviating an excessive cost burden is to downsize to smaller units, which can lead to overcrowding. While Marshall does not have a significant number of overcrowded units, the majority of these are efficiency and one-bedroom apartments, which displace one- and two-person households. Efficiency and one-bedroom units that could be affordable for many small, lower-income households are being rented by families with two to five members, while single-person households are forced to move into larger three-, four-, and five-bedroom units.

Comparison of Renter Households by Income to Available Affordable Rental Units



Persons Per Household by the Number of Bedrooms Using PUMS Data



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

Given the change in median housing costs from the ACS 5-year estimates of 2016-2020 to those of 2019-2023, it appears that affordability has already increased considerably over this three-year period, resulting in a greater mismatch in housing affordability. However, the Census Bureau's projections for income and housing purchase costs through 2030 indicate that incomes will rise at a faster rate than housing costs. The Census Bureau forecasts that median incomes will increase by 29.4% by 2030, while housing prices are expected to rise by only 11.7%. Gentrification in the oldest neighborhoods may lead to housing cost increases that exceed estimates, and the post-COVID economy, coupled with the current political climate, may not fully recover by 2030, resulting in slower economic growth than projected.

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 high HOME rents are equivalent to the fair market rents. However, without a HOME program or affordable housing developers in Marshall, any strategy to produce affordable housing will be limited. A primary reason for the current number of affordable housing units is the age of the existing housing stock. As new development or gentrification occurs, housing costs are likely to increase rather than stabilize or decrease. There is a significant shortage of multi-family housing, including rental apartments and condominiums and townhouses for purchase, which is necessary to provide more affordable housing.

Discussion

The housing cost mismatch in Marshall, particularly in the rental market, stems from a significant shortage of affordable units for lower-income households, coupled with an excess of luxury and larger units that are priced only within the reach of higher-income households. Consequently, individuals with incomes between 80% and 120% of the median are being squeezed out of viable housing options. Lower-income residents are forced to rent units that exceed their affordability, while higher-income individuals are either renting or purchasing units that are below their financial capacity, whether by choice or necessity. In recent years, there has been a noticeable trend toward gentrifying the older neighborhoods in the inner core of Marshall, especially in the northwest and west areas of the city. As African Americans relocate to newer neighborhoods to the south, older homes are being acquired and either renovated or rebuilt by Hispanic and White residents. Given the size of Marshall, even a small shift in population and income can significantly impact the housing stock and overall affordability.

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

Introduction

When applying the criteria for identifying housing issues, two of the four conditions pertain to the household rather than the structure: overcrowding and excessive cost burden. The only two structural conditions are the absence of complete plumbing and the lack of full kitchen facilities. Additional potential indicators of housing condition include age, value, occupancy, and location. One area in Marshall contains the majority of units that could be classified as substandard in physical condition, possibly to the extent that they require demolition and reconstruction. This area is bounded by Higgins on the east, Grand Avenue on the north, Allen on the west, and the region immediately south of Wiley University and University Boulevard on the south. There are approximately 285 vacant units listed for unspecified reasons, with low county appraiser values, and 195 of these units have not experienced any significant value increase in a decade. For generations, this area has had a notably high concentration of African American residents; however, many heirs of the properties have either left Marshall or are relocating to newer subdivisions to the south. Meanwhile, white and Hispanic individuals are moving in, contributing to the gentrification of the area. Despite this gentrification, a significant number of condemned structures and abandoned vacant lots remain.

Describe the jurisdiction's definition of "standard condition" and "substandard condition but suitable for rehabilitation":

The ACS program surveys a small percentage of households each month to compile one-year and five-year summaries. As a result, cross-tabulations at the census tract level are neither reliable nor do they guarantee respondent anonymity. Consequently, the Census Bureau produces a respondent-level dataset that includes an identifier linked to a geographic unit with a minimum population of 100,000. Therefore, the data files for Marshall are part of a three-county Public Use Microdata Area (PUMA), and no subarea identifiers are provided. The resulting file contained 1,398 survey responses for the region. Although there are other towns and unincorporated communities within the three counties, Marshall has the largest population. It is assumed that the highest percentage of respondents are from Marshall, and that the housing trends observed in the entire survey pool reflect the conditions in Marshall. Thus, the distribution of households by housing condition was applied to the total number of households in Marshall. Units are deemed substandard and likely unsuitable for rehabilitation if they are over 75 years old, have remained vacant for an extended period without being listed for sale or rent, are located in a block group experiencing declining values as reported by the appraisal district, and have been documented by the City's code enforcement officers as dilapidated. The table below presents the results of cross-tabulating the four structural housing conditions of concern, utilizing the ACS

2019-2023 3-county Public Use Microdata Sample (PUMS) housing variables, adjusted for the ACS's 2019-2023 summary specific to Marshall.

Condition of Units

Condition of Units	Owner-Occupied		Renter-Occupied	
	Number	%	Number	%
With one selected Condition	785	15.8%	1950	59.0%
With two selected Conditions	36	0.7%	85	2.6%
With three selected Conditions	0	0	0	0
With four selected Conditions	0	0	0	0
No selected Conditions	4,144	83.5%	1272	38.5%
Total	4,965		3,307	

Table 32 - Condition of Units

Data Source: 2016-2020 ACS 2019-2023 ACS estimates from PUMS

Year Unit Built

Year Unit Built	Owner-Occupied		Renter-Occupied	
	Number	%	Number	%
2000 or later	707	14.2%	524	15.8%
1980-1999	672	13.6%	885	26.8%
1950-1979	2,354	47.4%	1,322	40.0%
Before 1950	1,232	24.8%	576	17.4%
Total	4,965		3,307	

Table 33 – Year Unit Built

Data Source: 2016-2020 CHAS 2019-2023 ACS

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.	3,586	77.2%	1,898	57.4%
Housing units built before 1980 with children present	180	5.0%	156	8.2%

Table 34 – Risk of Lead-Based Paint

Data Source: 2016-2020 ACS (Total Units) 2016-2020 CHAS (Units with Children present) PUMS estimate

Vacant Units

	Suitable for Rehabilitation	Not Suitable for Rehabilitation	Total
Vacant Units	1,262	220	1,482
Abandoned Vacant Units	620	185	805
REO Properties	0	0	0
Abandoned REO Properties	0	0	0

Table 35 - Vacant Units

Need for Owner and Rental Rehabilitation

Due to the age of housing in Marshall, there is a significant need for both owner-occupied and rental rehabilitation, as well as for the abandoned vacant units that either require rehabilitation or will soon need it if they remain unoccupied. The vast majority of both owner-occupied and renter-occupied housing in Marshall consists of single-family dwellings, with approximately one-fourth being over 75 years old. Unfortunately, there is no reliable data on the level of rehabilitation needed for the occupied dwellings. Habitat for Humanity receives an annual CDBG grant from the City of Marshall to support minor to moderate rehabilitation of owner-occupied housing for low- to moderate-income households. The demand within this subset of occupied housing units far exceeds the six to twelve houses that can be funded each year. While the number of occupied units requiring major rehabilitation or demolition and reconstruction is considerably smaller than those needing minor to moderate rehabilitation, the individual needs of the substandard or condemned units are more urgent. The City's code enforcement officers issue citations for major structural issues to an average of 45 dwellings each year, with approximately 60% being eligible for major rehabilitation and 40% having been condemned and requiring demolition.

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

Approximately 43% of households may contain lead-based paint, as they were constructed before 1979. If this ratio is evenly distributed across all types of households—those with children, those without children, and non-family households—there are an estimated 1,058 families living in homes with lead-based paint hazards. Of these, approximately 31.5% belong to households with incomes at or below 80% of the area median, which translates to an estimated 336 families with children residing in dwellings built before 1980.

Discussion

Marshall has a significant percentage of housing units that are over 50 years old, along with a high rate of vacant properties, particularly those that remain unoccupied without a clear plan for future occupancy. Additionally, there is a considerable number of substandard and condemned units in Marshall. The most pressing issue contributing to the number of vacant units is the need for major rehabilitation or demolition. These houses are clustered in the area with the oldest homes and the highest percentage of multi-generational African American owners. As the heirs have dispersed and many of the properties lack clear titles, leaving the units vacant and unsellable. Many of the homes are at least 100 years old. Furthermore, Marshall does not receive HOME funds to facilitate the purchase, demolition, and reconstruction of units for rental or ownership that is affordable for low- to moderate-income households. During the period of this Consolidated Plan, it is anticipated that a committee will convene to develop a plan for infill redevelopment in Westside, Marshall's primary CDBG Target area located in central and northwest area of Marshall. The committee is expected to include representatives from the Marshall Housing Authority, the City of Marshall, Habitat for Humanity, and other non-profit and for-profit developers from the Dallas area and East Texas. The objective will be to secure HOME funds from the Texas Department of Housing and Community Affairs, CDBG funds, and seized lots from the City of Marshall, while also seeking assistance from private foundations and businesses.

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

Introduction

The Marshall Housing Authority has recently initiated a voluntary conversion of public housing units to tenant-based assistance. This plan has been approved by HUD but is currently on hold. The properties will be transferred to the Marshall-Harrison County Public Facility Corporation (MHCPC), a non-profit organization that will continue to maintain and improve the two properties using funds from Section 8 Tenant-Based Vouchers. The 50 units at Oak Leaf Village will remain designated for the elderly and disabled. Recently, the MHA's Troubled PHA status was removed, and it is now classified as a Standard PHA.

Totals Number of Units

	Certificate	Mod-Rehab	Public Housing	Program Type					
				Total	Project - based	Tenant - based	Vouchers		
							Veterans Affairs Supportive Housing	Family Unification Program	Disabled *
# of units vouchers available	0	0	74	651	8	643	0	0	0
# of accessible units			50						

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

Table 36 – Total Number of Units by Program Type

Data Source: PIC (PIH Information Center)

Describe the supply of public housing developments:

Recently, the Marshall Housing Authority completed the application for the Section 22 Streamlined Voluntary Conversion of its two public housing developments, which consist of 24 general family units and 50 units designated for elderly and disabled residents. Although the application has been approved by HUD, it is currently on hold. Once the hold is lifted or alternative measures are implemented, the units will be owned and managed by the Marshall-Harrison County Public Facility Corporation (MHCPC), a 501(c)(3) non-profit organization. MHCPC will maintain and enhance the units using funding derived from Section 8 Vouchers. Additional proceeds will be allocated for the development of further housing projects that are affordable for low-income individuals. All current tenants of the two developments will remain in place in accordance with Section 8 regulations. The Marshall Housing Authority prioritizes homeless individuals, victims of domestic violence, and foster children aging out of the foster

care system. Inter-agency agreements for supplemental services for these groups include partnerships with the East Texas Women's Shelter, East Texas Open Door Youth Shelter, and the TwelveWay Foundation Treatment Center. MHA has also established a tentative coalition with local churches to address homeless services, and Mission Marshall is collaborating with the City's CDBG Coordinator to provide assistance to homeless individuals and families, including help in accessing housing through MHA or MHCPFC.

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

The latest inspection score for Oak Leaf Village, which serves elderly or disabled residents, was 93, with no deficiencies noted. In contrast, the Poplar Street Apartments, comprising 24 units, received a score of 75c, indicating at least one serious issue. All deficiencies have since been corrected, and MHA staff undergo regular training to identify and address physical issues. Both developments will soon be managed by the MHCPFC and will qualify as Section 8 units. At that time, MHCPFC will be responsible for maintenance and improvements and will be staffed by former MHA personnel who have received the necessary training.

Public Housing Condition

Public Housing Development	Average Inspection Score
Poplar	75c
Oakley	93a

Table 37 - Public Housing Condition

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

The public housing units are being converted to Section 8 HCV units and the improvements needed have taken place. The Marshall-Harrison County Public Facility Corporation (MHCPFC) will maintain and improve the two developments as needed to be competitive with the private sector housing.

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

The primary strategy for improving the living conditions of public housing units involves converting the two developments into Section 8 tenant-based units managed by a non-profit corporation. This transition will enable the corporation to utilize rents and subsidies more effectively to maintain and enhance the properties compared to the ability of previous management under public housing. Additionally, tenants will have greater flexibility as voucher holders rather than public housing recipients. As part of the conversion application, the MHA

demonstrated that transitioning to Housing Choice Vouchers allows residents to use their vouchers in other areas of the city, thereby encouraging enhancements that can compete with private apartment complexes accepting HCVs.

Discussion:

In recent years, the Marshall Housing Authority, under new leadership, has made significant strides in improving public housing and scattered-site housing in Marshall. MHA has established partnerships with agencies that assist the homeless, victims of domestic violence, and youth transitioning out of foster care, prioritizing these vulnerable populations for housing as needs arise and utilizing the services of these organizations when necessary. Furthermore, MHA has actively encouraged more landlords to accept Housing Choice Vouchers and has recently established a non-profit organization to manage the 74 public housing units approved for conversion to Section 8 units. Although the conversion has been temporarily halted by HUD, MHA is collaborating with HUD and exploring other avenues to ensure the transition occurs. MHA continues to pursue additional Housing Choice Vouchers to increase the availability of quality housing for low-income residents. Additionally, the housing authority supports developers in applying for Low-Income Housing Tax Credits (LIHTC) to either convert existing properties or construct new affordable housing in Marshall.

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

Introduction

During the COVID-19 pandemic, homeless shelters in Marshall closed, leaving the city without shelter or services for its unhoused population. One organization is currently renovating the former city jail to convert it into a homeless shelter. Once the renovation is complete and the facility meets local, state, and federal Housing Quality Standards for shelters, it will open with approximately seven rooms. According to the Texas Education Agency, there were 144 homeless children in Marshall Independent School District (ISD) during the 2023-2024 school year. January 2025 marked the first year that the Homeless Point in Time (PIT) and Housing Inventory Count (HIC) were conducted in Marshall. The CDBG staff, with assistance from Mission Marshall, conducted the surveys in lieu of the North East Texas Homeless Consortium, which serves Gregg and Harrison Counties but is based in Longview, Gregg County. A sobriety living center has 18 beds, with 14 designated for transitional housing for up to three years of treatment and four currently serving as permanent supportive housing. Although no additional units are under development, the agency is in the planning stages to expand both its transitional living and permanent supportive housing programs. East Texas Open Door provides housing for female youth in the Child Protective Services (CPS) system in a group home. The agency owns three additional homes adjacent to the current property. The long-term plan is to convert one of these homes into adult transitional housing for young women aging out of foster care, another facility for male youth in the foster care system, and the fourth facility for young men transitioning out of foster care.

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)	0	0	0	0	0
Households with Only Adults	0	0	0	0	0
Chronically Homeless Households	0	0	14	4	0
Veterans	0	0	0	0	0
Unaccompanied Youth	0	0	8	0	0

Table 38 - Facilities and Housing Targeted to Homeless Households

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

At present, there is a significant lack of mainstream services for homeless individuals. The school district, in collaboration with the Communities in Schools organization, offers case management and referrals for homeless youth and their families. The TwelveWay Residential Recovery Program provides housing and treatment for men struggling with substance use disorders and co-occurring conditions. East Texas Open Door offers housing and support services for girls within the CPS system. However, none of these programs are considered mainstream, as they only cater to their specific program participants. GoBus, a program of the East Texas Council of Governments, provides transportation from Marshall to Longview, and one of the functions of the homeless assistance funds through CDBG is to cover bus fare for those seeking shelter or services in Longview. During PY 2025, the CDBG team will reach out to Marshall Cab, Hurd Taxi, Uber, and Lyft to establish a process to fund demand-response transportation for homeless individuals seeking mainstream services in Longview or Shreveport.

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.

One general homeless facility may be reopening in the future once the structure has been renovated and occupancy permits issued. Twelve-way is a half-way residential program for men with substance use disorders, and provides supportive housing to men who are exiting incarceration or have become homeless. There is no maximum length of stay and some units are permanent supportive housing units. Twelve-way intends to expand the program, providing units to homeless men with no substance use history, and to women with substance use disorders, as well as to those in need of permanent supportive housing once they have completed their recovery program. East Texas Open Door owns four houses which can be operated as group homes. At this time only one house serves as a group home for girls in CPS care. The plans in the near future are to open a second dwelling next door to be permanent supportive housing for the girls who age out of foster care and have nowhere to live that will provide the continuing support needed. The longer-range plans are to open one of the remaining two homes as a group home for boys in CPS care and ultimately utilize the fourth dwelling to house young men who have aged out of foster care.

Women's Center of East Texas has an office in Marshall and provides a secure emergency shelter nearby for women in danger due to domestic violence, sexual abuse, stalking or human trafficking. The facility serves Harrison and Gregg Counties.

Guardian Crossroads is a new program in Marshall that provides transitional living for homeless youth in a village concept constructed with shipping containers.

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

Introduction

Marshall is located between Longview (population of 83,236) and Shreveport (population of 177,959) and most of the facilities and services for the special needs populations are located in these two cities, each approximately 20 minutes from Marshall. There are few facilities located in Marshall, though some of the larger programs have satellite administrative offices in Marshall. The greatest need is affordable and supportive housing. There is a shortage of affordable housing in Marshall and the only permanent supportive housing is TwelveWay men's residential recovery program which allows the program graduates to remain as long as necessary.

Marshall is located between Longview, which has a population of 83,236, and Shreveport, with a population of 177,959. Most facilities and services for individuals with special needs are found in these two cities, each situated approximately 20 minutes from Marshall. Although there are few facilities directly in Marshall, some larger programs maintain satellite administrative offices in the area. The most pressing need is for affordable and supportive housing. Currently, there is a shortage of housing in Marshall, and the only permanent supportive housing available is the Twelve-Way Men's Residential Recovery Program, which allows program graduates to stay for as long as necessary. Another significant need in Marshall is affordable transportation to facilities and services in Longview or Shreveport. During PY 2025, the CDBG team will implement a program to provide free transportation to homeless individuals and families. If this program proves successful, it will be expanded to include special needs populations in PY 2026.

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

Mental Health: There are 12 mental health providers for a ratio of 1,959 residents per provider.

Substance Use: There are no substance use treatment facilities in Marshall or in Harrison County. There is one residential half-way house for men recovering from substance use disorders.

Other Psycho-social disorders: There are 3 clinical social workers in Marshall for a ratio of 7,836 residents per worker.

Children: Marshall has five pediatricians for a ratio of 1,143 children per pediatrician.

Elderly & Frail Elderly: There are 2 geriatric care providers in Marshall for a ratio of 1,959 elderly per provider. There are no custodial care facilities in Marshall or Harrison County. There are two nursing facilities housing 241 individuals.

HIV/AIDS: Marshall-Harrison County Health Department provides HIV and STD testing and there are a number of on-line and phone facilities throughout the nation for HIV PrEP prescriptions.

Victims of Domestic Violence, Sexual Assault, Stalking, Human Trafficking: The Women's Center of East Texas has an office in Marshall and provides counseling, crisis interventions, emergency shelter, transitional housing,

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

There are no programs for ensuring that persons returning from mental and physical health institutions receive appropriate supportive housing. TwelveWay does provide half-way housing and permanent supportive housing for men who have a substance use disorder and are returning from incarceration or treatment institution or who have become homeless.

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)

During the upcoming year, the CDBG team plans to collaborate with TwelveWay to identify funding sources aimed at expanding their housing program, particularly the permanent supportive housing for men who have completed the residential treatment program. Additionally, the CDBG team will work with East Texas Open Door to identify funding for a group home adjacent to their current facility, designed for young women aging out of foster care who have nowhere to live.

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

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

Negative Effects of Public Policies on Affordable Housing and Residential Investment

Overall, Marshall is a very affordable city compared to other communities in Texas and the nation as a whole. According to the 2019-2023 ACS, the median value of owner-occupied housing is \$133,000, and the median rent is \$929. However, Marshall has not experienced growth since 1990, resulting in very little new housing development. The values and rents reflect the age of the dwellings, with the median age of housing in Marshall being 54 years; 21.7% of the homes were built before 1950. Despite the relatively low cost of purchasing much of the housing in Marshall, the additional expenses for renovation can make these purchases unaffordable. Furthermore, the city is predominantly composed of single-family homes, with 77% of all housing classified as single-family detached. The second most common housing type consists of structures with three to four units, accounting for 6% of the total housing stock, followed by mobile homes at 3.7%. Only 1% of the housing is located in multi-family complexes with 50 or more units.

The shortage of multi-family housing units is primarily due to the age of the existing housing stock, which was constructed before the emergence of multi-family developments, as well as the stagnation of growth within the city, rather than the land use regulations. A recent review of public policies indicates that there are no regulations that unduly limit or negatively impact the return on residential investments through excessive taxes, fees, zoning regulations, or building codes. The City has consistently demonstrated flexibility in zoning requirements when appropriate to promote in-fill housing development, particularly for affordable housing. According to the latest Home Mortgage Disclosure Act (HMDA) data, in 2023, there were 688 loan applications for home purchases, resulting in 195 mortgage originations with an average loan amount of \$114,500 and an average income of \$88,000.

There continues to be a substantial number of abandoned properties in Marshall. The City is unable to foreclose on these properties without a clear title or knowledge of the owners' locations. Many of the properties, particularly infill lots in Westside, cannot be acquired by the City for donation or sale for the construction or demolition/reconstruction of affordable housing due to legal issues surrounding ownership. A significant challenge is the issue of heirs' property, where lots or homes have been informally inherited without a clear title, preventing resale. This situation often arises when the property owner either lacks clear title or cannot be located, or when they die intestate. In some cases, potential heirs may be unaware of the owner's death, and the courts may have no knowledge of the heirs. Additionally, older properties frequently have conflicting boundary lines, resulting in yards and houses that do not conform to legal surveys.

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

Introduction

Marshall is primarily a manufacturing and construction city, with support services—particularly education, health care, and retail trade—comprising the remainder of the workforce. The health care and educational sectors employ 24.5% of the workers in Marshall, with manufacturing accounting for the second largest share of jobs; however, nearly half of the manufacturing workers reside outside the city limits. Construction jobs are primarily located outside of Marshall, while most workers live within the city limits. Other sectors exhibit a more balanced distribution between workers and available jobs. Christus Good Shepherd Medical Center is the major employer in the health care sector, with 550 or more employees. The Marshall Independent School District, East Texas Baptist University, and Wiley University represent the majority of the education and health care workforce. The primary manufacturing activities in Marshall include metal fabrication and woodworking. Over the years, Trinity Industries has been the major manufacturer, producing rail cars and parts. In 2014, it employed more than 22,000 people—equivalent to the entire population of Marshall. However, according to more recent data, their workforce in Marshall has declined by more than 50%. Legacy National Cabinet Corporation (also known as Republic National Cabinet) is a significant national cabinet manufacturer, employing approximately 400 individuals divided between Marshall and Addison. Other manufacturing companies, most of which focus on metal fabrication, are considerably smaller; however, together they account for approximately 100 employees. Construction, retail trade, accommodations, and other services comprise the majority of the remaining workforce.

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	278	900	2.6	8.0	323.7
Arts, Entertainment, Accommodations	998	1,192	9.4	10.6	119.4
Construction	1,017	198	9.5	1.8	19.5
Education and Health Care Services	2,609	2,423	24.5	21.6	92.9
Finance, Insurance, and Real Estate	671	747	6.3	6.7	111.3

Business by Sector	Number of Workers	Number of Jobs	Share of Workers %	Share of Jobs %	Jobs less workers %
Information	56	61	0.5	0.5	108.9
Manufacturing	1,287	2,056	12.1	18.4	159.8
Other Services	1,451	892	6.2	8.0	136.0
Professional, Scientific, Management Services	674	303	6.3	2.7	45.0
Public Administration	415	629	3.9	5.6	152.7
Retail Trade	1,130	1,532	10.6	13.7	135.6
Transportation & Warehousing	795	84	7.5	0.8	10.6
Wholesale Trade	71	178	0.7	1.6	250.7
Grand Total	10,654	11,195	100.0	100.0	105.1

Table 39 - Business Activity

Data Source: [2019-2023 ACS \(Workers\), 2022 Longitudinal Employer-Household Dynamics \(Jobs\)](#)

Labor Force

Total Population in the Civilian Labor Force	11,078
Civilian Employed Population 16 years and over	10,207
Unemployment Rate	7.86
Unemployment Rate for Ages 16-24	9.63
Unemployment Rate for Ages 25-65	7.42

Table 40 - Labor Force

Data Source: 2016-2020 ACS

Occupations by Sector	Number of People
Management, business and financial	2,555
Farming, fisheries and forestry occupations	0
Service	2,147
Sales and office	1,854
Construction, extraction, maintenance and repair	1,240
Production, transportation and material moving	2,411

Table 41 – Occupations by Sector

Data Source: 2016-2020 ACS

Travel Time

Travel Time	Number	Percentage
< 30 Minutes	7,773	82.1
30-59 Minutes	1,387	14.7
60 or More Minutes	303	3.2
Total	9,463	100.0

Table 42 - Travel Time

Data Source: 2016-2020 ACS

Education:

Educational Attainment by Employment Status (Population 16 and Older)

Educational Attainment	In Labor Force			Not in Labor Force
	Civilian Employed	Unemployed		
Less than high school graduate	654		91	513
High school graduate (includes equivalency)	2,790		58	1,437
Some college or Associate's degree	2,410		412	793
Bachelor's degree or higher	1,754		57	230

Table 43 - Educational Attainment by Employment Status

Data Source: 2016-2020 ACS

Educational Attainment by Age

	Age				
	18–24 yrs	25–34 yrs	35–44 yrs	45–65 yrs	65+ yrs
Less than 9th grade	28	87	55	371	237
9th to 12th grade, no diploma	249	209	220	316	139
High school graduate, GED, or alternative	1,187	1,699	748	1,838	922
Some college, no degree	1,231	856	811	1,024	984
Associate's degree	94	326	328	270	283
Bachelor's degree	295	409	518	450	502
Graduate or professional degree	27	63	249	363	361

Table 44 - Educational Attainment by Age

Data Source: 2016-2020 ACS

Educational Attainment – Median Earnings in the Past 12 Months

Educational Attainment	Median Earnings in the Past 12 Months
Less than high school graduate	\$22,642
High school graduate (includes equivalency)	\$30,451
Some college or Associate's degree	\$31,301
Bachelor's degree	\$43,695
Graduate or professional degree	\$62,946

Table 45 – Median Earnings in the Past 12 Months

Data Source: 2016-2020 ACS

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

Marshall's largest employment sectors are education and health care, followed by manufacturing and retail trade. The total number of jobs is nearly balanced with the total number of employees in Marshall. However, there are significant imbalances in certain sectors, such as oil and gas extraction, manufacturing, wholesale trade, public administration, and retail trade, where the number of jobs exceeds the number of workers living within the city limits. A notable anomaly is the abundance of jobs in the agriculture, mining, and oil and gas extraction sectors, which have more than three times the number of jobs compared to the employees residing within the city. While the agriculture sector has very few jobs, the mining and oil and gas extraction positions are primarily professional-level office roles, with employees living in new residential developments in the unincorporated county. Conversely, construction, professional services, and transportation/warehousing sectors have significantly fewer jobs within the city limits than the number of city residents employed in those fields. With the exception of the professional sectors—such as professional, scientific, and management services—the sectors with fewer jobs than employees tend to require larger facilities and employ more laborers who reside in older, lower-cost housing within the city limits.

Describe the workforce and infrastructure needs of the business community:

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.

Employment diversity, defined as the variety of occupations within the job market, can significantly contribute to local economic stability. The Employment Entropy Index is measured on a scale from 0 to 1, where values closer to 1 indicate a higher level of employment diversity, and values closer to 0 suggest a lack of diversity and fewer job opportunities. The Census Bureau's Center for Economic Studies employs its Longitudinal Employer-Household Dynamics (LEHD), LEHD Origin-Destination Employment Statistics (LODES), and Workplace Area Characteristics (WAC) to calculate the Employment Entropy Index. Marshall, as a whole, has an index score of 0.93, reflecting strong employment diversity. Most of the block groups within the city core also exhibit high Employment Entropy Index scores. However, as one moves further from the city center—specifically north of Pinecrest, south of Grand, west of Indian Springs Drive (FM 31), and east of Carter's Ferry/Sanford—the index scores tend to decrease. These outer areas of Marshall and Harrison County are more residentially developed, featuring moderate industrial employment and limited commercial job opportunities.

The primary needs for workforce development and business support in Marshall are financial assistance for small businesses and improved transportation infrastructure, including bus routes, sidewalks, and streets, particularly in the older areas of the city. According to information from the Harrison County Appraisal District, there has been moderate new construction in commercial properties since 2000. A comparison of properties over time by land use indicates that many public works and industrial properties have either been converted to commercial or residential use, vacated, or demolished. Wiley University plans to purchase abandoned commercial properties to renovate and offer them for rent at below-market prices to micro-enterprises and other small businesses. Additionally, the university intends to establish a small business development center to support these enterprises.

Marshall Economic Development Council (MEDC) is dedicated to attracting new employers to the city while also fostering the growth of local businesses through small business and workforce training initiatives. In 2024, MEDC received the Champion for Career and Technology Education Award from the Region 7 Texas Education Department Center. MEDC collaborates closely with the Marshall Independent School District, Wiley University, East Texas Baptist University, and Texas State Technical College to develop additional programs focused on technology education and job placement assistance. All three post-secondary institutions offer dual credit classes for high school students.

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

Currently, the skills and education of the workforce align with the job market in Marshall. However, as the market evolves, additional education and training will be necessary. Post-secondary institutions are working to develop programs that can prepare students for various job markets across the country. With the exception of the education and healthcare sectors, Marshall's job market primarily employs craftsmen and semi-skilled workers.

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.

In 2022, Texas State Technical College acquired a \$170,000 Computer Numerical Control (CNC) machine to provide students with specialized machining training. Additionally, Tesla and Bombardier Aviation have partnered with TSTC to develop training programs that prepare students for employment opportunities with their companies.

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

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.

Discussion

Marshall's job market primarily employs craftsmen and semi-skilled workers, along with educators and healthcare professionals. As technology grows, craftsmen, skilled and semi-skilled workers will have to adjust, therefore education is a critical need. Texas State Technical College is adapting its programs to prepare students for the advancements that are on the horizon. Wiley University is developing a plan to provide a small business incubator and development center as well as lost-cost office space for micro-enterprises and small businesses in Westside. The majority of East Texas Baptist University's graduate programs are in mental health services and advanced communications – two growing needs locally and nationally.

MA-50 Needs and Market Analysis Discussion

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

Predominantly single-family neighborhoods generally have higher housing costs compared to areas that offer a mix of multi-family and single-family units. While older homes may be less expensive to purchase, the maintenance costs for homeowners or landlords are often greater than those for newer properties. Marshall exemplifies both conditions—primarily consisting of single-family older homes—which presents a double-edged sword in terms of affordable, quality housing.

The area facing the most significant structural housing challenges due to type, age, and vacancies is Westside. This region also encounters multiple demographic issues that exacerbate these problems. It is characterized by a high percentage of low-income households and elderly residents living in overcrowded conditions or lacking complete plumbing and kitchen facilities, primarily as renters or squatters. This predominantly BIPOC region, defined by Census Block Group boundaries, is located north of Pinecrest, south of US 80, west of Washington, and east of MLK Blvd. It contains 2,245 housing units, of which 25.4% were constructed before 1950, and 23.6% are currently vacant. Among the occupied units, 41% experience an excessive cost burden, 7.9% are overcrowded, 133 lack complete plumbing, and 212 lack complete kitchens. A significant contributor to the high vacancy rate is the number of inherited housing properties, which poses a challenge for redevelopment in this area. Original owners have died intestate, without a proper deed, or without heirs, or have left behind heirs who have moved away and abandoned the property. The presumed lots often do not align with legal property lines, making it difficult for owners or their heirs to secure clear title.

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

Westside, described above, has the highest BIPOC population, comprising 83.9%, which includes 69.9% African American, 12.5% Hispanic, and 1.6% other non-white individuals. This area predominantly consists of low- to moderate-income households, with 72.7% of households earning less than 80% of the area's median household income. Historically, this is where African Americans first settled in Marshall. As later generations have begun to move to newer neighborhoods or abandon their inherited properties, many homes have remained vacant, while others are now occupied by Hispanic households.

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

The housing in the area is predominantly older, with 60.9% of the structures having been built more than 55 years ago, and nearly half of those constructed prior to 1950. Approximately one-fourth of the dwellings are vacant, many of which are uninhabitable. City staff conducted a windshield survey of the core area, identifying approximately 100 substandard or condemned houses, some of which are still occupied. Less than ten percent of the housing has been constructed since 2000, primarily replacing dwellings deemed unfit for habitation.

Are there any community assets in these areas/neighborhoods?

The area features two recently renovated neighborhood parks and a community center located within the redeveloped George Washington Carver Elementary School. A medical center is situated on the east side of the area, adjacent to City Park. Wiley University, a historically Black college and university (HBCU), is located in the heart of the area, while East Texas Baptist University is less than one mile to the north. The area is predominantly residential, with a few local small businesses. There are no national or regional chain grocery stores, urgent care centers, pharmacies, or doctors' offices in the vicinity; however, there are three dental clinics.

Are there other strategic opportunities in any of these areas?

The strategic opportunities in the area include single-family and duplex infill construction on existing vacant lots, as well as the demolition of condemned housing followed by reconstruction. Wiley College has established a 500-bed residential center for students near the campus. There is a pressing need for additional student housing for both Wiley and East Texas Baptist University (ETBU), and a few open areas are suitable for the development of student housing or apartments, particularly for employees of the nearby medical center. During the term of this five-year Consolidated Plan, the City will continue to explore the potential for acquiring abandoned tax-delinquent lots and dilapidated houses to donate to non-profit developers for infill housing. However, without HOME funds, the City must seek alternative methods to encourage developers to invest in the area. One approach is to promote and facilitate the use of Texas HOME funds by developers while providing assistance with local CDBG dollars. There is property east of the hospital available for additional medical facilities, which could increase employment opportunities and subsequently drive greater demand for infill housing in Westside. Wiley University is developing a plan to secure vacant commercial properties for a Small Business Development Center and offices for microbusinesses. The revitalization of Westside is essential but requires more funding than CDBG can provide. During PY 2023 and 2024, the new CDBG Coordinator has made significant progress in informing stakeholders about the needs and various funding opportunities that can enhance the quality of housing and amenities in the area.

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.

Connect Nation Texas conducted a community technology assessment for Harrison County in 2021, leading the Harrison County Broadband Team to initiate their action plan for expanding broadband access throughout the county. However, given the rapid growth in broadband connectivity and the extensive unincorporated areas covered by the assessment, more reliable information may be derived from the 2019-2023 American Community Survey, which offers data at the census block group level.

The 2019-2023 ACS indicates that only 86.1% of households citywide and 82.7% of households in the Westside area have access to any type of broadband service. Since the 2015-2019 ACS five-year survey, the percentage of households with incomes below \$20,000 that had internet service increased from 38.6% to 62.9% (2019-2023 ACS). This rise demonstrates a concerted effort to provide internet service options to all residents of Marshall. Although the service is relatively reliable and accessible, the Solutions section of the Executive Broadband Plan recommends that the following actions be taken:

- Establish and maintain a Broadband Technology Council composed of diverse stakeholders representing healthcare, government, education, public safety, business, agriculture, and the broader community.
- Increase broadband speeds, particularly in unserved and underserved areas.
- Increase broadband adoption and develop workshops focused on digital literacy, digital skills, and telework readiness.

In addition to the recommendations outlined in the Broadband Plan, there is a need for increased competition throughout the city, not only in the newer eastern developments and rural areas.

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

There is a pressing need for increased competition in Marshall's internet service market. According to the Connect Nation Texas assessment, Harrison County has 13 internet providers. However, the 2024 data from the Federal Communications Commission indicates that, within any given census tract in Marshall, there are no more than three providers, and in many areas of the

city, only one provider is available. In Westside, a single provider serves most of the region, with two areas lacking any internet service. Fiber optic service is offered by one provider in the far eastern and western parts of the city, as well as along State Highway 80. The percentage of Westside households with internet subscriptions varies by block group, ranging from 70% to 100%. Given that 49.9% of Marshall residents and 52.8% of Westside residents fall into the low-to moderate-income category, there is a significant demand for more competitive pricing, especially for those eligible for the Affordable Connectivity Program.

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

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

The 2023 National Risk Index (NRI) by Federal Emergency Management Agency (FEMA) scores census tracts from zero (no risk) to 100 (highest risk) for a variety of environmental hazards. "Risk" is defined as the potential for negative impacts as a result of a natural hazard. The various City-level Hazard Risk Index Scores by environmental hazard range from 58 for lightning hazards to 96 for tornado hazards, with winter weather at 63, riverine flooding at 69, strong wind at 74, and wildfires at 78. All of these risks are associated with climate change and urban development. The NRI is a begins with the area's Social Vulnerability Index, developed by the University of South Carolina's Hazards and Vulnerability Research Institute. uses 30 social characteristics from the American Community Survey to quantify the area's vulnerability to various hazards. The index is scored from zero to one, with values closer to one reflecting the highest vulnerability to environmental hazards and Marshall's overall Social Vulnerability Index is 0.53. The Community Resilience Score is the second value used to develop the NRI. The CRS, developed by FEMA, represents the ability of a community to prepare, adapt to, and recover from major disruptions. The Community Resilience Score is a ranking of the particular area with all other like geographies in either the state or nation. The NRI score is then calculated as the value of expected annual loss multiplied by the Social Vulnerability Score and then divided by the Community Resilience Score. Marshall census tracts rank slightly above the median compared to others throughout Texas meaning it is more resilient than half of the state's other census tracts. Conversely the census tracts in Marshall rank 27th in the nation, indicating that nearly three-fourths of the nation is more resilient.

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

The low- to moderate-income households are more vulnerable to all the environmental hazards affecting Marshall. The age and condition of the housing in Marshall is a significant factor in determining the vulnerability of the population. More often the low- to moderate-income households reside in older dwellings in older neighborhoods with aging infrastructure. The median age of housing in Marshall is 54 years, and 68 years in Westside. As a result environmental damage is often more severe in these neighborhoods, particularly in the Westside area, which has many of the oldest small houses in the city. Additionally, 54% of homeowners in Marshall, and more than two-thirds in Westside, have no mortgage, therefore are not required by the lender to have insurance. While rents in Marshall are well below the state average, landlords often do not fully insure the structures due to the low profit margins and renters often can't afford renter's insurance for the contents. Lower-income households tend to live in older, poorer maintained housing and are unable to avoid full insurance coverage. This is especially the case in Westside. The large number of abandoned condemned homes in Westside makes the

area less safe in the case of tornadoes or strong winds, resulting in surrounding properties being damaged by debris.

Strategic Plan

SP-05 Overview

Strategic Plan Overview

The City of Marshall has a population of 23,646 which has remained constant since 1990 and is not predicted to increase by more than 500 by 2032. The population is 50% low- to moderate-income, two-thirds BIPOC, with one-third households having at least one elderly resident. The housing stock in Marshall is 85% single family, duplex and mobile homes, and has a median age of 54 years. One third of the households are paying more than 30% of their income for housing, and 26% of low-income households are paying more than 50% of their income for housing. The needs in Marshall far exceed the actual and potential public and private grants. The Westside area is in the greatest need of revitalization and has the highest percentage of low- to moderate-income households and BIPOC population in the city. Some individual-level gentrification has begun in the area and the City's CDBG Coordinator is committed to working with the community to secure other funds, including Texas HOME funds, for assisting in developing affordable housing in Westside where there is an abundance of abandoned lots and houses. Wiley University is embarking on a strategic plan to provide job training, entrepreneur training, a business development center and commercial space for microenterprises in the Westside area. The CDBG Coordinator is committed to reducing homelessness throughout the city and assisting those providing shelter and permanent supportive housing in identifying and securing funding through the Continuum of Care program and Texas Emergency Solutions Grant. Additionally, the CDBG program will continue to focus a significant portion of its annual allocation on owner-occupied housing rehabilitation. During the ending 5-year cycle, the City has used CDBG to rehabilitate xxx homes throughout the city. The housing needs in Marshall, especially homes owned and occupied by low- to moderate-income elderly, and the City will continue to fund Habitat for Humanity and any other eligible agencies in providing moderate housing rehabilitation or demolition and reconstruction. Also during the 5-year cycle, the City has used CDBG funds to renovate a city park in Westside, to assist a non-profit in converting a former elementary school into a community center with indoor and outdoor facilities. Additional restructuring of parts of the community center will be needed during the upcoming 5-year time period.

Public service agencies are the mainstay for assisting residents in need and Marshall will continue to distribute the maximum allowed CDBG funds among eligible agencies serving those in need city-wide.

Put more in

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

Geographic Area

1	Area Name:	Westside
	Area Type:	Local Target area
	Other Target Area Description:	Block groups: 20401-4, 20402-1, 20402-2, 20402-4, 20402-5
	HUD Approval Date:	Data approved in 2023 as ACS-2020-Low-Mod-Summarized-All Block Groups
	% of Low/ Mod:	72.7%
	Revital Type:	Affordable housing, amenities, commercial development
	Other Revital Description:	
	Identify the neighborhood boundaries for this target area.	Grand Ave (SH 80) on the north, Washington Ave on the east, Pinecrest Dr (Hwy 43) on the south, MLK Blvd (Loop 390) on the west.
	Include specific housing and commercial characteristics of this target area.	Single family housing, most more than 75 years old, high vacancy rates, significant substandard and condemned properties, very little commercial enterprises, no national or regional food chains or drug stores are in the areas. A HBCU university, a hospital, two newly renovated parks and a community center are in the area.
	How did your consultation and citizen participation process help you to identify this neighborhood as a target area?	Consultations with the GW Carver Community Center, the City's code enforcement officers, the City's Parks Department, small businesses that applied for CDBG-CV funding, Habitat for Humanity, and the public surveys for this Consolidated Plan
	Identify the needs in this target area.	Affordable housing in infill lots, rehabilitation of existing housing, grocery stores, drug stores, business incentives, medical facilities, sidewalks, street improvements.

What are the opportunities for improvement in this target area?	Using State HOME funds and other public and private funds, along with investments from CDBG and provision of abandoned lots, developers would be able to construct affordable housing units on the infill lots. Wiley University with public and private funding and CDBG
Are there barriers to improvement in this target area?	The primary barriers are money and insufficient capacity in the development and non-profit sectors to provide affordable housing and commercial structures. In addition, the heir housing where properties are abandoned, and even some occupied properties don't have clear title.

Table 46 - Geographic Priority Areas

General Allocation Priorities

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

City of Marshall's general allocation priorities include funding public services to the maximum level allowed by regulation; provide housing rehabilitation to owner occupied housing, particularly elderly or disabled; provide shelter/supportive housing to homeless households; renovate public facilities such as community centers and parks; construct or reconstruct public infrastructures such as sidewalks, roads, storm drains/sewers; and provide assistance to developers of affordable housing, particularly in Westside.

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

Priority Needs

1	Priority Need Name	Public Services
	Priority Level	High
	Population	Extremely Low, Low, Moderate Population & Households
	Geographic Areas Affected	City-wide
	Associated Goals	Public Services
	Description	The goal is to improve the quality and capacity of public service agencies that serve the LMI population in Marshall to enhance and support those in need of food, rental assistance, literacy education, job training, counseling, homeless assistance, or other necessities
	Basis for Relative Priority	Results of community surveys, data from national and state sources, input from members of city boards and committees, agency representatives, applications from public service entities
2	Priority Need Name	Housing rehabilitation
	Priority Level	High
	Population	Extremely Low, Low, Moderate homeowners
	Geographic Areas Affected	City-wide
	Associated Goals	Housing Rehabilitation
	Description	Provide funding for the rehabilitation of housing owned and occupied by LMI household to support the safety and wellbeing of the owners and assist in preserving the neighborhood
	Basis for Relative Priority	Results of community surveys, data from state & national sources, inquiries for assistance by public, input from members of city boards and committees, discussion with primary provider -Habitat for Humanity

3	Priority Need Name	Homeless Assistance Programs
	Priority Level	High
	Population	Homeless
	Geographic Areas Affected	City-wide
	Associated Goals	Homeless Assistance
	Description	Provide assistance to homeless individuals and households in basic necessities, and to provide assistance to shelters, transitional living centers, and permanent supportive housing to assist those who are seeking temporary or permanent housing
	Basis for Relative Priority	Survey results from Point In Time and Housing Inventory Count, discussions with agencies serving the homeless, advocates for the homeless, Texas Homeless Network, North East Texas Homeless Consortium
4	Priority Need Name	Public Facilities
	Priority Level	High
	Population	Extremely Low, Low, Moderate income in LMI Target Areas
	Geographic Areas Affected	Westside, New Town, other CDBG-eligible Block Groups
	Associated Goals	Public Facilities
	Description	Improve the livability of LMI neighborhoods by providing, maintaining, and growing public amenities such as parks, community centers, civic centers, libraries, and other eligible community gathering locations
	Basis for Relative Priority	Results of community surveys, 2043 Comprehensive Plan, input from members of city boards and committees, discussions with relevant agencies and city departments
5	Priority Need Name	Public Infrastructure
	Priority Level	High

	Population	Extremely Low, Low, Moderate income in LMI Target Areas
	Geographic Areas Affected	Westside, New Town, other CDBG-eligible Block Groups
	Associated Goals	Public Infrastructure
	Description	Improve the safety and livability of neighborhoods by improving the quality and resilience of aging infrastructure such as drainage, roads, sidewalks, water lines, sewer lines,
	Basis for Relative Priority	Results of community surveys, 2043 Comprehensive Plan, input from members of city boards and committees, discussions with relevant agencies and city departments, 2043 Comprehensive Plan
6	Priority Need Name	New Affordable Housing
	Priority Level	High
	Population	Extremely Low, Low, Moderate Income
	Geographic Areas Affected	Westside
	Associated Goals	New Affordable Housing
	Description	Provide assistance to developers to reconstruct or construct affordable housing for homeownership on vacant infill lots in Westside
	Basis for Relative Priority	Results of state and national data sources, responses from agencies providing affordable housing in the area or state-wide, discussions with code enforcement officers, results of windshield survey of Westside neighborhood, discussions with specialists in "heir" housing and redevelopment, 2043 Comprehensive Plan
7	Priority Need Name	Homeless Facilities
	Priority Level	High
	Population	Homeless
	Geographic Areas Affected	City-wide

	Associated Goals	Homeless Facilities
	Description	Provide assistance to shelters, transitional living centers, supportive housing programs through technical assistance, conducting the annual PIT/HIC count, developing a committee to spearhead a homeless services plan and to coordinate applications to the Balance of State for Continuum of Care funding
	Basis for Relative Priority	Results of the survey for the 2024 PIT/HIC counts, discussions with agencies housing the homeless, discussions with other homeless assistance providers,
8	Priority Need Name	Economic Development
	Priority Level	High
	Population	Extremely Low, Low, Moderate
	Geographic Areas Affected	City-wide
	Associated Goals	Economic Development
	Description	Provide assistance to agencies providing job training, job placement, and other related assistance to persons in Marshall. Also provide business incubators and office space in CDBG Target Areas through a small business development center
	Basis for Relative Priority	Results of surveys, discussions with Wiley University and public service agencies, data from State and Federal agencies.
9	Priority Need Name	Technical Assistance
	Priority Level	High
	Population	Low- to moderate-population
	Geographic Areas Affected	City-wide
	Associated Goals	Technical Assistance

	Description	CDBG team will spearhead and coordinate technical assistance activities for agencies that are serving the CDBG-eligible population with CDBG-eligible activities including public service, housing, homeless, special needs, and economic development
	Basis for Relative Priority	Program Administration is a requirement for receiving CDBG funds and for management of the projects and systems.
10	Priority Need Name	Program Administration
	Priority Level	High
	Population	CDBG program recipients
	Geographic Areas Affected	City-wide
	Associated Goals	Program Administration
	Description	Administer and manage the CDBG program to ensure compliance, effectiveness, and timeliness.
	Basis for Relative Priority	Program Administration is a requirement for receiving CDBG funds and for management of the projects and systems.

Table 47 – Priority Needs Summary

Narrative (Optional)

The above priorities comprise the programmatic areas in which Marshall has the greatest need in low- to moderate-income areas and for low- to moderate-income individuals and households. The key issues of focus during the next five years is public services, housing, and homelessness. As funds become available facilities and infrastructure will be addressed. Given the funding realities, not every priority need can be addressed each year, however the City's CDBG Coordinator and CDBG Consultant are working to engage more service and housing providers in the process to encourage and facilitate applications to other funding sources such as Texas HOME and ESG programs, Continuum of Care program, and private foundations.

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

Influence of Market Conditions

Affordable Housing Type	Market Characteristics that will influence the use of funds available for housing type
Tenant Based Rental Assistance (TBRA)	The conversion of public housing units to Housing Choice Vouchers will assist in providing additional TBRA while maintaining the units previously as public housing. No CDBG funds are expected to be available for TBRA
TBRA for Non-Homeless Special Needs	The conversion of public housing units to Housing Choice Vouchers will assist in providing additional TBRA while maintaining the units previously as public housing. One of the former public housing developments is reserved for the elderly and disabled. No CDBG funds are expected to be available for TBRA
New Unit Production	Marshall is embarking on a program to identify infill lots that can be acquired by non-profit developers for new affordable housing units, focusing in the Westside area. Once a collaborative among funders, developers, the City, East Texas COG, and the State has been established CDBG funds can be used to purchase lots and assist in funding construction. More than 50% of renters in Marshall have an excessive housing cost burden and the acquisition of abandoned lots and condemned houses for clearing and construction of homes affordable for purchase is a goal of the CDBG program.
Rehabilitation	Marshall does fund housing rehabilitation with CDBG funds. The Marshall housing stock is relatively old and single family. Two-thirds of owner-occupied housing was constructed before 1980 with 67% of the housing in Marshall was constructed prior to 1980. One fourth of the units were built before 1950. One third of the owners are elderly with a median income of \$41,800. As a result the need for housing rehabilitation is great.
Acquisition, including preservation	There is a significant number of abandoned lots and houses in Marshall, particularly in the Westside Target Area. The City CDBG Coordinator and Code Enforcement Officers have identified more than 100 abandoned lots or condemned structures in Westside. This is coupled with One of the goals during PY 2025-2029 is to identify organizations to purchase the properties and construct affordable single-family homes. More than 50% of renters in Marshall have an excessive housing cost burden and the acquisition of abandoned lots and condemned houses for clearing and construction of homes affordable for purchase is a goal of the CDBG program.

Table 48 – Influence of Market Conditions

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

Introduction

The City of Marshall will receive \$304,234 in CDBG funds for PY 2025. There is no way to predict the annual amount to be awarded for the remaining four years, however the Consolidated Plan is based on the assumption that the City will receive at least the same amount each year from PY 2026 through PY 2029. In the past, most of the public service subrecipients have remained with the program and will likely remain in the future. The CDBG Coordinator is active in identifying other potential subrecipients that provide facilities, housing, and services to the low- to moderate-income households.

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	HUD	Public Services, Facilities, Housing Rehab, Administration	304,234	\$0	\$26,900	\$331,134	\$1,216.936	It is assumed that the annual allocation for the next 4 years will be at least equal to this year's. The PY 2024 carry-over funds are being allocated to a new facility applicant serving homeless and special needs populations.

Table 49 - 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 CDBG program does not have a match requirement. The annual allocations will be used to augment and leverage City and non-profit funds for public services, housing programs, shelters, facility improvements, as well as CDBG program management. Due to the limit on funding public service agencies, those agencies funded use CDBG funds to serve only a portion of their eligible clientele and a portion of each included client's costs. There is approximately a 1:5 or 1:4 public-to-private investment in the services. While the City uses CDBG funds for the cost of housing rehabilitation, managed by Habitat for Humanity, the agency also builds homes in and around Marshall for sale to low- to moderate-income households at an affordable price. With CDBG help, Anointed Grace Ministries/George Washington Carver Community Center has been able to match private funds approximately dollar for dollar with CDBG funds to turn an old, abandoned elementary school into a thriving community center in Westside, the oldest and most under-resourced area in Marshall. During PY 2024, the CDBG Coordinator identified agencies serving the homeless or individuals at risk of homelessness and is working to include them in the CDBG program. It is anticipated that CDBG funds will be used to expand the programs of TwelveWay and East Texas Open Door, as well as to assist the agencies in securing State and Federal funds outside of CDBG. Both agencies provide housing for special populations – those with a substance use disorder and those youth in CPS. Both have the facilities to expand to provide transitional or permanent supportive housing to those completing their programs. There are no operational shelters in Marshall at this time, though the City is expecting one to reopen once it can obtain an occupancy permit. At that time, the City will entertain their funding applications for a part of their expenses. Also during PY 2024, the City began developing a homeless assistance plan with the intent of identifying agencies that can apply for Continuum of Care funding in the future. Also in PY 2024, the CDBG Coordinator began working with Wiley University in determining which economic development and job training programs would be fundable using other Federal and State grant funds and how CDBG funds could augment the other sources.

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

No currently owned city properties are being anticipated for use by CDBG activities. In PY 2024, the City renovated a city park with CDBG funds and may renovate other public facilities in the future. The Westside area has the oldest homes in Marshall, many of which are abandoned and unsound, and an abundance of infill lots. The CDBG team is looking into methods for the City to take possession of those properties which have unpaid taxes and donate or sell for a minimal fee to developers of scattered site housing affordable to the low- to moderate-income. The city-owned property would be passed through to entities able to clear and reconstruct housing for

sale to low- to moderate-income households, including households completing the Marshall Housing Authority's Section 8 Homeownership program.

Discussion

PY 2025 will be a year of focusing on the most vulnerable people and neighborhood to identify the solutions to the problems identified in PY 2024. During PY 2024, the City also faced a timeliness issue with CDBG expenditures. The problem is now resolved and during PY 2025, the City will ensure that agencies expend funds in a timely manner and that the City's Finance Department reimburses the agencies within one to two weeks of approving the invoice. Moving forward through the following four years of this Consolidated Plan, the City will invest significant time in developing cohesive strategies to bring providers of services, housing, shelter, and facilities together in order to address the most pressing challenges in Marshall.

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 Marshall	Government	Affordable Housing – Ownership Homelessness Non-homeless Community Development Public facilities Neighborhood improvements Public services Economic development Planning	Corporate limits of Marshall

Table 50 - Institutional Delivery Structure

Assess of Strengths and Gaps in the Institutional Delivery System

Due to the size of Marshall, located between Shreveport, Louisiana and Longview, Texas with much larger populations, most public service, housing, homeless and HIV services are located in those two cities and not in Marshall. Economies of scale have, in the past, prevented both mainstream and specialized services from locating Marshall. As a result, the knowledge base that develops from collaborative interactions has been minimal. The CDBG Coordinator and CDBG Consultant began in PY 2024 to identify all services in Marshall that could benefit from coordination among themselves, better information on the needs in the community, related service capacities, and potential public and private funding sources. During PY 2024, the CDBG team began identifying the homeless population, and shelter, housing, and services for them. Marshall staff conducted the first comprehensive Point in Time and Housing Inventory Count for Marshall as the first step creating a Social Service Collaborative and either developing local involvement in the NET Homeless Consortium or establishing a Harrison County Homeless Coalition. While the gaps are many, this new enthusiasm to identify both gaps and assets and to better coordinate and expand assets promises to greatly enhance the institutional delivery system during the coming five years.

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

Table 51 - 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)

During PY 2024 the CDBG Coordinator and CDBG Consultant devoted considerable effort to identifying the needs of the homeless population and the resources available to address the needs. There is a service delivery system that has been in place for many years but never identified in terms of assisting the homeless. TwelveWay is a residential program for men with substance use disorders, many of whom are exiting incarceration. However, the program has a unique twist in that those men with no suitable housing available upon completion of the treatment program may remain by paying rent on a sliding scale, turning a portion of the facility into permanent supportive housing for chronically homeless. Additionally, East Texas Open Door has four adjacent large single family dwellings. One is occupied by female youth under CPS care and funding. Another is slated to be opened for those or other female youth aging out of foster care with nowhere to live. The agency is discussing replicating these two women's programs for

young men. Marshall's CDBG program is in discussions with both agencies to alert them to funding opportunities through CDBG, Texas HOME and ESG, and Texas Balance of State Continuum of Care. In addition, the CDBG team has worked with Mission Marshall, Mission Housing Authority, Salvation Army and GoBus transportation in forming an informal small coalition that can serve the homeless on the street. January 2024 was the first Point in Time and Housing Inventory Count conducted in Marshall and was carried out by City staff rather than the North East Texas Homeless Consortium which includes Harrison County and Marshall in the determination of pro rata share of funding though the City in the past has not participated in the activities.

The CDBG team is actively working to create a group of providers that will become involved in the NET Homeless Consortium to build broader collaborations or to form a Harrison County Homeless Coalition. Either option will afford the opportunity to participate in the Continuum of Care processes and funding.

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

Marshall is a relatively small city within a large rural county. There has been limited capacity to support businesses, including non-profit providers or services to special needs populations and those experiencing homelessness. There has been very limited interaction among the various agencies and between agencies and the City, though there are programs within Marshall that address the special needs and homeless populations without labeling their clientele or their program mission as such. East Texas Open Door provides supportive housing for female youth in the CPS foster care system, many of whom have intellectual and mental health difficulties. TwelveWay provides residential substance abuse treatment to men and also provides long term housing for program graduates with no other housing opportunities. The system that the treatment graduates are a part of is a true permanent supportive housing system. Neither agency recognized that they were serving homeless people and that there are resources in the state to help them expand in volume and scope.

While there are definite strengths in the programs of these two agencies as well as others, the gaps are in communication and awareness of the larger system and funding stream. During the term of this 5-Year Consolidate Plan, the CDBG Coordinator and consultant will be working to identify more agencies serving the homeless and special needs populations, providing technical assistance to inform them of funding streams that may benefit their programs, and building collaboration and continuity among them.

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

Marshall's CDBG strategy for PY 2025-2029 is to develop an institutional structure in house and through the community to eliminate much of the communication and awareness gaps among the agencies, elected officials, other City staff, and the public. Once the CDBG team can assess the mission and scope of the agencies in Marshall and of the available public and private funding that would be available, then a model of an institutional structure and integrated service delivery system can be implemented, which may include joining forces with the existing multi-county homeless coalition, or breaking out from inclusion and forming a new homeless and special needs coalition.

SP-45 Goals Summary – 91.215(a)(4)

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
1	Public Services	2025	2029	Non-Housing Community Development	City-wide	Youth Services Adult Education Homeless Services Food Pantry Services Subsistence Payments Substance Abuse		Public service Activities other than Low/Moderate Income Housing Benefit
2	Housing Rehabilitation	2025	2029	Affordable Housing	City-wide	Housing Rehabilitation		Homeowner Housing Rehabilitation
3	Homeless Assistance Programs	2025	2029	Homeless Assistance	City-wide	Homelessness		Homelessness Prevention
4	Public Facilities	2025	2029	Non-Housing Community Development	Westside	Public Facilities		Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit
5	Public Infrastructure	2025	2029	Non-Housing Community Development	Westside	Public Infrastructure		Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit
6	Affordable Housing	2025	2029	Affordable Housing	Westside	Affordable Housing		Homeowner Housing Added
7	Homeless Facilities	2025	2029	Homeless	City-wide	Homelessness Facilities		Housing for Homeless
8	Economic Development	2025	2029	Non-Housing Community Development	City-wide	Economic Development		Businesses Assisted
9	Technical Assistance	2025	2029		City-wide	Capacity		Agencies Assisted
10	Administration	2025	2029	Administration	City-wide	Program Administration		Administration

Table 52 – Goals Summary

Goal Descriptions

1	Goal Name	Public Services
	Goal Description	The goal is to fund various public service agencies to improve the quality and capacity of services to the LMI population in the areas of food provision, rental assistance, literacy education, youth services, elderly assistance, and other needs being addressed by local service agencies.
2	Goal Name	Housing Rehabilitation
	Goal Description	The goal is to fund qualified agencies to rehabilitate owner-occupied homes within the City of Marshall, particularly those owned by elderly or disabled. The primary focus is minor to moderate rehabilitation and ADA compliance retrofits
3	Goal Name	Homeless Assistance Programs
	Goal Description	As part of the Public Services cap, the goal is to provide assistance to homeless persons in Marshall with sustenance, shelter/housing placement, transportation, proper identification cards.
4	Goal Name	Public Facilities
	Goal Description	The goal is to repurpose and renovate facilities that house programs serving the low- to moderate-income neighborhoods in Westside. These include community centers, parks, recreation spaces, warming and cooling stations for homeless or residents in housing without power, youth centers, and other facilities to provide much needed amenities to the residents of Westside.
5	Goal Name	Public Infrastructure
	Goal Description	The goal is to construct or reconstruct sidewalks, roads, water lines, wastewater lines, and drainage in Westside and other CDBG Target Areas.
6	Goal Name	Affordable Housing

	Goal Description	The goal is to assist housing agencies in acquiring infill lots and constructing or reconstructing owner-occupied housing in Westside for low- to moderate-income households. The goal is the target abandoned properties, particularly those without clear titles and assist appropriate developers in securing clear title and producing affordable homes as a way to revitalize the neighborhood and revitalize the lives of those for whom the housing is provided.
7	Goal Name	Homeless Facilities
	Goal Description	The goal is to provide assistance to homeless shelters, transitional living centers and permanent supportive housing programs by providing technical assistance on securing grants, and providing limited funds for renovating and operating the properties. The primary recipients are slated to be youth aging out of foster care, victims of domestic violence, adults with substance abuse or mental health issues, and those released from jail or prison.
8	Goal Name	Economic Development
	Goal Description	The goal is to provide assistance to small business, business incubators, and small business development centers, primarily those located in Westside or other CDBG Target Areas, and to provide assistance to agencies providing job training and job readiness.
9	Goal Name	Technical Assistance
	Goal Description	The goal is to better serve the needs of the low- to moderate-income by providing technical assistance to the non-profit providers to better identify the needs, align their services, secure public and private funding resulting in better services to an expanded population
10	Goal Name	Program Administration
	Goal Description	The goal is to constantly improve the administration and management of the CDBG Program.

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)

Marshall commits to expending CDBG funds to rehabilitate 50 owner-occupied homes throughout the city, and administrate housing with limited funding to mobilize a housing reconstruction program in Westside.

The City of Marshall does not receive HOME funds. The City plans to work with eligible non-profit organizations to assist them in securing State HOME funds for the construction of infill single family housing affordable for purchase by low- to moderate-income households. While there is a desire to revitalize the housing in Westside and increase the availability of sound affordable housing, the City is only in the planning and discussion stage and recognizing that there is no local capacity at this time to carry out the construction to meet community needs. The next five years will be a time of education, collaboration, planning and identification of private sector partners along with private and public sector funders to carry out the redevelopment tasks that will bring new housing to the oldest area of the city.

The Marshall Public Housing Authority has divested itself of its public housing developments, turning them into Housing Choice Voucher units under the management of a new non-profit, No new units are being added to the Housing Authority's volume, this move does make units more accessible as all Housing Authority residents are now Housing Choice Voucher holders and can which opens up more choice and ensures that some units which were for public housing residents only won't remain vacant while the HCV program has a waiting list.

Marshall commits to expending CDBG funds to rehabilitate 50 owner-occupied homes throughout the city, and administrative housing with limited funding to mobilize a housing reconstruction program in Westside.

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)

Currently, Marshall Public Housing Authority exceeds the Section 504 requirements and is converting all public housing units into Housing Choice Voucher housing under the management of a separate non-profit manager. The Oak Leaf complex for elderly and disabled will remain for those populations as part of the HCV program. However, there is a need city-wide for accessible subsidized and non-subsidized housing.

Activities to Increase Resident Involvements

With the conversion of the two public housing developments to HCVs, there will be no public housing residents in public housing per se. The organization that will be managing the former public housing developments will be encouraging resident involvement though it will not be under the purview of the Housing Authority.

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

No, the troubled designation has been removed.

Plan to remove the ‘troubled’ designation

Not applicable

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

Barriers to Affordable Housing

Overall, Marshall is a very affordable city compared to other communities in Texas and the nation as a whole. According to the 2019-2023 ACS, the median value of owner-occupied housing is \$133,000, and the median rent is \$929. However, Marshall has not experienced growth since 1990, resulting in very little new housing development. The values and rents reflect the age of the dwellings, with the median age of housing in Marshall being 54 years; 21.7% of the homes were built before 1950. Despite the relatively low cost of purchasing much of the housing in Marshall, the additional expenses for renovation can make these purchases unaffordable. Furthermore, the city is predominantly composed of single-family homes, with 77% of all housing classified as single-family detached. The second most common housing type consists of structures with three to four units, accounting for 6% of the total housing stock, followed by mobile homes at 3.7%. Only 1% of the housing is located in multi-family complexes with 50 or more units.

The shortage of multi-family housing units is primarily due to the age of the existing housing stock, which was constructed before the emergence of multi-family developments, as well as the stagnation of growth within the city, rather than the land use regulations. A recent review of public policies indicates that there are no regulations that unduly limit or negatively impact the return on residential investments through excessive taxes, fees, zoning regulations, or building codes. The City has consistently demonstrated flexibility in zoning requirements when appropriate to promote in-fill housing development, particularly for affordable housing. According to the latest Home Mortgage Disclosure Act (HMDA) data, in 2023, there were 688 loan applications for home purchases, resulting in 195 mortgage originations with an average loan amount of \$114,500 and an average income of \$88,000.

There continues to be a substantial number of abandoned properties in Marshall. The City is unable to foreclose on these properties without a clear title or knowledge of the owners' locations. Many of the properties, particularly infill lots in Westside, cannot be acquired by the City for donation or sale for the construction or demolition/reconstruction of affordable housing due to legal issues surrounding ownership. A significant challenge is the issue of heirs' property, where lots or homes have been informally inherited without a clear title, preventing resale. This situation often arises when the property owner either lacks clear title or cannot be located, or when they die intestate. In some cases, potential heirs may be unaware of the owner's death, and the courts may have no knowledge of the heirs. Additionally, older properties frequently have conflicting boundary lines, resulting in yards and houses that do not conform to legal surveys.

Strategy to Remove or Ameliorate the Barriers to Affordable Housing

Despite the fact that rents in Marshall are lower than in most other cities in the state, incomes are also significantly lower, which limits housing affordability. The housing stock is predominantly composed of older, single-family homes. The combination of low market rates and a stagnant population has led housing developers to seek opportunities elsewhere for profitable development. The City is committed to enhancing its collaboration with housing and social service providers to devise strategies aimed at creating more affordable housing units while simultaneously increasing incomes.

One of the goals of the CDBG team for the upcoming program year is to collaborate with the East Texas Heirs' Property Initiative, which is developing a model to address property issues in East Texas. Currently, the initiative is supporting 12 locations, and Marshall is interested in becoming one of their new partners. Resolving the Heirs' Property issue in Westside, along with identifying and encouraging one or more developers to construct affordable single-family homes in the area, would significantly alleviate the housing cost burden for homeowners and address the problem of unsound living conditions.

The Housing Authority continues to educate landlords about the benefits of accepting Housing Choice Vouchers (HCV) and assists program participants in finding high-quality housing that meets their needs. During the PY 2023–2024, the MHA sought approval from HUD to convert its two public housing developments into HCV units, which would be managed by a separate non-profit organization. Although the request was approved, it was subsequently put on hold. The MHA is exploring alternative avenues for converting the public housing units into HCV units. Additionally, the MHA hosts homeownership workshops at least once a year for the general public, and up to three times per year, for Housing Choice Voucher residents in collaboration with Cadence Bank. The program includes credit repair assistance to prepare residents for applying for a mortgage. The goal is to help HCV residents transition into homeownership, thereby freeing up the vouchers they held prior to purchasing a home.

The City is also committed to thoroughly reviewing all Marshall LIHTC applications submitted to the State and to supporting the process with special use permits and other necessary adjustments.

SP-60 Homelessness Strategy – 91.215(d)

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

In January, 2025, City staff conducted the first Point in Time (PIT) and Housing Inventory Count (HIC) in recent years. Though Harrison County, and in turn Marshall, are part of the North East Texas Homeless Consortium, no City staff members and no service providers have been active in the consortium and no PIT/HIC counts have been made for Marshall until 2025. Not only was an extensive search for homeless conducted during the PIT count, but the CDBG Coordinator has continued to meet with the individuals counted and to secure information and locations of others with whom she could communicate. Currently strategies are being developed to provide hot meals at least once a week for homeless individuals as well as laundry facilities. The Mission Marshall Food Pantry will be delivering non-perishable food bags to the encampments and to those on the streets. The City will be setting up temporary stations for homeless individuals to receive legitimate identification cards similar to State cards. The City will continue to conduct annual PIT/HIC surveys and will continue to reach out to homeless persons to determine their needs and to request opinions about proposed programs to better serve them.

Addressing the emergency and transitional housing needs of homeless persons

There are no shelters in Marshall. Three shelters closed in 2019 due to funding issues. One shelter opened but was forced to close until it could meet fire, building and safety codes. The City will entertain a proposal for CDBG funds from the shelter once it has received a Certificate of Occupancy for housing people.

The City and Mission Marshall have secured approval from Salvation Army in Longview to send anyone seeking emergency shelter to their facility. GoBus transit has agreed to transport the individuals to Salvation Army. Any homeless person desiring shelter can go to Mission Marshall and fill out the appropriate forms to be accepted by Salvation Army, then be transported at no cost. In addition, they will be triaged and if they have a substance use disorder they will be referred to TwelveWay to be placed on a waiting list or accepted immediately if there is space. The CDBG Coordinator and the director of East Texas Open Door and in discussions about opening another Open Door house for those girls who have been in the foster care program with them but have now aged out with nowhere to go. They will be housed in the group home and provided with supportive services until they can become self sufficient. Other avenues are being investigated to provide shelter and transitional housing for homeless youth, men, women and families.

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.

TwelveWay provides housing for men with substance use disorders, including those exiting incarceration or detoxification. The men who comply with the rules of the house are allowed to stay after recovery for as long as they want, providing a form of permanent supportive housing. TwelveWay is looking to expand their capacity so that more men can remain with TwelveWay in post-treatment transitional housing or permanent supportive housing.

East Texas Open Door currently provides housing in a group home for girls in foster care. The organization owns four houses within the same street and block and intend to expand their services. The goal is to open a second house as a transitional living facility for the young women aging out of foster care. The third house would be for boys in foster care and the fourth house would be for young men aging out of foster care.

There are no facilities for families or for victims of domestic abuse or sexual attack. During the five years of this Consolidated Plan, the City CDBG team will be providing technical assistance to the identified organizations for securing Texas and Continuum of Care funds, and to help other groups develop shelters and transitional living facilities to fill the gaps.

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

At this time only two facilities capable of providing care for individuals discharged from a publicly funded institution. TwelveWay who receives men in need of substance abuse treatment who have exiting jail, prison, hospital or other rehabilitation facility. East Texas Open Door provides housing for girls from CPS through the foster care system. Their care is paid for in large part by CPS and the agency raises funds for the funding gaps. Both programs assist the residents with their educational needs and with job preparation and placement. There are no funds available for emergency rental assistance to prevent homelessness.

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

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

During the next five years, the City intends to contract one or more subrecipients to rehabilitate approximately 50 owner occupied homes. All homes to be rehabilitated and that are built before 1978, are evaluated and the proper lead-based paint remediation protocols are followed. It is anticipated that as many as 40 of the 50 homes will have been constructed before 1979. The protocols as to the level of testing needed will be followed and reports provided to the CDBG Coordinator with the reimbursement requests. In the event that the City is able to secure lots and developers for constructing new or replacement affordable housing in Westside, all grounds will be tested for lead and asbestos and remediated in the proper and legal manner.

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

Based on past history of the rehabilitation program, approximately 30% of the homes do not need lead testing as no paint surfaces are disturbed. The additional 70% are tested for lead in the paint and are remediate. The rehabilitation program does minor and moderate repair and often if paint is to be disturbed it is a small area. If the City is involved in any demolition or clearing of lots with a previous building, then the soil and debris will be tested and remediated.

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

The housing policies and procedures spell out in detail the regulations concerning when testing is required, if required and lead is discovered then the extent of remediation that is required. The housing policies will be amended when the plan for infill development is established. The testing and remediation of all potentially toxic substances will be a part of the policies and procedures.

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

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

The goals of the City, Marshall Economic Development Corporation (MEDC) and Marshall Housing Authority are aimed at reducing the number of poverty-level families through basic education (GED preparation, literacy education, life skills development), post-secondary training, certification and education, as well as expanding the employment base with jobs that pay a livable above-poverty wage.

The City will use its CDBG funds to support adult literacy/GED education and youth services that will reduce drop-outs and help prepare them for jobs, training or further education after graduating from High School. MEDC will continue to provide incentives to local businesses for expansion, scholarships for existing employees and higher wages. MEDC will also continue to market Marshall to employers looking to relocate which serves to build the employment base and access to higher-paying jobs. Elements of the MHA homeownership and self-sufficiency programs are aimed at increasing incomes to raise the public housing and HCV residents out of poverty and into self-sufficiency.

Wiley University is in the planning process for purchasing abandoned storefronts to house a small business development center, a business incubator, job preparation assistance, commercial space for micro-enterprises and small businesses at a significantly reduced cost.

The City plans to work with Wiley University, Texas State Technical College, and East Texas Baptist University to coordinate an apprentice program, that would be managed by a housing developer constructing infill housing in Westside. The City will work to help facilitate an appropriate entity successfully applying for a Youthbuild grant.

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

Without a sufficient population earning above 200% of the poverty level, there will not be households that would be able to afford the new homes that the City is attempting to facilitate in Westside. And, without the construction industry willing to provide apprenticeships, the residents will likely not exit poverty. There are definitely other job training opportunities for other skills, however the development of affordable housing utilizing construction apprentices addresses two gaps in the community – affordable housing and those who can afford the housing. Affordability is a two-part issue.

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

The City of Marshall's monitoring strategy is designed to assist staff in fulfilling its regulatory obligations in monitoring subrecipients, including City departments, as well as assist subrecipients in best serving their consumers. The primary purpose for this monitoring strategy is to ensure proper program performance, financial performance, and regulatory compliance in accordance with HUD Regulations. Included in the primary purpose is the monitoring strategy to ensure that the goals, objectives, and priorities of the Consolidated Plan are being met and that funds are expended in a timely manner, meeting HUD's timeliness requirements. In order to ensure that the activities are meeting the priorities set forth in the Consolidated Plan, the City reviews all subrecipient applications and City-recommended projects prior to the selection of projects for the Annual Action Plan. In addition, during the program year the City attempts to fill any voids or gaps in addressing the Consolidated Plan priorities by seeking additional agencies who are qualified to carry out needed priority activities.

The monitoring process is an on-going one of planning, implementation, communication, and follow-up. A major component of the monitoring process is the review of all documents submitted with the reimbursement requests. These documents include all supporting financial supporting as well as client information and agency staffing information. Each document is carefully reviewed and any concerns or questions are directed to the submitting agency. No funds are reimbursed until all documentation is in order. Throughout the year, the City reviews expenditures to track timeliness and alerts subrecipients and City projects to any delays in spending.

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-CDBG sources. The CDBG Coordinator assists the subrecipients and potential subrecipients in identifying other funding sources that may be more appropriate or may augment the CDBG resources.

Staff will continue to have the responsibility to ensure that each subrecipient, including each recipient City department, is adhering to their approved scope of service, budget, and schedule of service. Each subrecipient or City department must also abide by the regulatory guidelines set forth by HUD in providing and documenting benefits to low-moderate income persons and/or eliminating a slum or blighted condition.

Under normal circumstances, on-site monitoring is conducted annually to semi-annually. However, if the activity or program is considered to have a high-risk of non-compliance or is a newly-funded agency, a more frequent monitoring schedule is developed based on the nature of the activity being performed. High-risk programs include programs undertaken by any one subrecipient or City department for the first time, housing rehabilitation, and programs undertaken by an agency or department with a history of staff turnover, reporting problems, or monitoring findings. The details of the monitoring strategy can be found in the CDBG Policies and Procedures Manual.

Expected Resources

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

Introduction

The City of Marshall will receive \$304,234 in CDBG funds for PY 2025. It is expected that there will be \$26,900 in carry over funds from prior years and will be added to the PY 2024 allocation for a total of \$330,134. The carry over funds will be used to provide improvements to TwelveWay, a residential substance abuse treatment program that also provides transitional housing of homeless men, and permanent supportive housing for any program graduates who wanting to stay in place.

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	HUD	Public Services, Facilities, Housing Rehab, Administration	\$304,234	\$0	\$26,900	\$330,134	\$1,212,936	It is assumed that the annual allocation for the next 4 years will be at least equal to this year's. The PY 2024 carry-over funds are being allocated to a new facility applicant serving homeless and special needs populations.

Table 53 - 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 program does not have a match requirement. The PY 2025 allocation will be used to augment and leverage City and non-profit funds for public services, housing rehabilitation, facility improvements, as well as CDBG program management. Due to the limit on funding public service agencies, those funded use CDBG funds to serve only a portion of their eligible clientele and a portion of each client's costs. There is approximately a 1:5 or 1:4 public-to-private investment in the services. While the City uses CDBG funds for the cost of housing rehabilitation, managed by Habitat for Humanity, the agency also builds homes in and around Marshall for sale to low- to moderate-income households at an affordable price. Anointed Grace Ministries/George Washington Carver Community Center uses private grant funds to merge with CDBG for their much-needed improvements and re-utilization of an old, abandoned school which is now in the process of becoming an active community center in the heart of Westside, the oldest and most under-resourced area in Marshall. During PY 2024, the CDBG Coordinator identified agencies serving the homeless or at risk of homelessness and worked to include them in the program. TwelveWay will be receiving funds to improve their facility for men with a substance use disorder, homeless, or who benefit from continued permanent supportive housing. During PY 2025, the City will provide technical assistance to the agency, East Texas Open Door and any others providing shelter, transitional housing, or permanent housing to those who are the most vulnerable. The City will also continue to seek solutions to the interrelated issues of insufficient affordable housing and exceedingly high vacancy rates due to substandard conditions. As solutions are determined, CDBG will, in the future, be able to be leveraged for addressing the issue.

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

The Westside area has the oldest homes in Marshall, many of which are abandoned and unsound, and an abundance of infill lots. The CDBG team is looking into methods for the City to take possession of those properties with unpaid taxes and donate or sell for a minimal fee to developers of scattered site housing affordable to the low- to moderate-income.

Discussion

PY 2025 will be a year of focusing on the most vulnerable people and neighborhood to identify the solutions to the problems identified in PY 2024. During PY 2024, the City also faced a timeliness issue with CDBG expenditures. The problem is now resolved and during PY 2025, the City will ensure that agencies expend funds in a timely manner and that the City's Finance Department reimburses the agencies within one to two weeks of approving the invoice.

Annual Goals and Objectives

AP-20 Annual Goals and Objectives

Goals Summary Information

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
1	Public Services	2025	2029	Non-Housing Community Development	City-wide	Youth Services Adult Education Homeless Services Food Pantry Services Subsistence Payments Substance Abuse		Public service Activities other than Low/Moderate Income Housing Benefit
2	Housing Rehabilitation	2025	2029	Affordable Housing	City-wide	Housing Rehabilitation		Homeowner Housing Rehabilitation
3	Homeless Assistance Programs	2025	2029	Homeless Assistance	City-wide	Homelessness		Homelessness Prevention
4	Public Facilities	2025	2029	Non-Housing Community Development	Westside	Public Facilities		Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit
5	Administration	2025	2029	Administration	City-wide	Program Administration		Administration

Table 54 – Goals Summary

Goal Descriptions

1	Goal Name	Public Services
	Goal Description	The goal is to fund various public service agencies to improve the quality and capacity of services to the LMI population in the areas of food provision, rental assistance, literacy education, youth services, elderly assistance, and other needs being addressed by local service agencies.
2	Goal Name	Housing Rehabilitation
	Goal Description	The goal is to fund qualified agencies to rehabilitate owner-occupied homes within the City of Marshall, particularly those owned by elderly or disabled. The primary focus is minor to moderate rehabilitation and ADA compliance retrofits
3	Goal Name	Homeless Assistance Programs
	Goal Description	As part of the Public Services cap, the goal is to provide assistance to homeless persons in Marshall with sustenance, shelter/housing placement, transportation, proper identification cards, and other vital services.
4	Goal Name	Public Facilities
	Goal Description	The goal is to repurpose and renovate facilities that house programs serving the low- to moderate-income neighborhoods in Westside. These include community centers, parks, recreation spaces, warming and cooling stations for homeless or residents in housing without power, youth centers, and other facilities to provide much needed amenities to the residents of Westside.
	Goal Description	The goal is to better serve the needs of the low- to moderate-income by providing technical assistance to the non-profit providers to better identify the needs, align their services, secure public and private funding resulting in better services to an expanded population
5	Goal Name	Program Administration
	Goal Description	The goal is to constantly improve the administration and management of the CDBG Program.

Projects

AP-35 Projects – 91.220(d)

Introduction

Marshall will provide funding to the maximum allowed amount – 15% of the PY 2025 allocation – to five public services to improve the resiliency of those residents in greatest need: youth, those with limited reading ability, those with food insecurity, and the unhoused. In addition, Marshall will fund North East Texas Habitat for Humanity to rehabilitate owner occupied homes; GW Carver's Community Center to improve the facility with a new roof; TwelveWay residential treatment center to provide new laundry equipment for those with substance abuse disorders; and program administration. These projects will be covered through the PY 2025 allocation plus \$26,900 in estimated carry-over funds. If additional funds are carried over from prior years, adjustments will be made to the projects that do not have regulatory caps. These projects reflect the City's plans for this 5-Year Consolidated Planning period to address those most under-resourced residents and areas in Marshall. The Program Administration funds will serve to manage the CDBG program and to continue the planning begun in 2024 to address both homelessness and abandoned housing and residential lots.

Projects

#	Project Name
1	Boys & Girls Club
2	Communities in Schools
3	Harrison Co. Literacy Council
4	Mission Marshall Food Pantry
5	Homeless Assistance
6	GWC Community Center Roof
7	NET Habitat for Humanity
8	TwelveWay Facility Improvements
9	Program Administration

Table 55 – Project Information

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

The reasons for allocation priorities include response from residents through surveys, engagement, and individual discussions with residents and service providers; response to the ACS data and code enforcement officers of the significant number of abandoned houses and residential lots in the Westside area; and the number of homeless youth in the school district

that prompted staff to conduct its own Point in Time and Housing Inventory Count to assess the homeless issue in Marshall. The conclusions were that all of the agencies assisting the under-resourced are under-resourced themselves; the Westside area – the oldest, least affluent, and minority area in the city -- lacks community amenities; and the street homeless, those in residential treatment programs, and those youth in group foster care are the most vulnerable and need assistance immediately and will need housing in the near future. The Westside area cannot sustain or flourish without addressing the housing issue – both the abandoned homes and the shortage of livable housing.

AP-38 Project Summary

Project Summary Information

1	Project Name	Boys & Girls Club
	Target Area	City-wide
	Goals Supported	Public Services
	Needs Addressed	After school services for youth and children
	Funding	CDBG: \$11,250
	Description	The Boys and Girls Club of Big Pines will provide after-school services to 100 youth. Services will include, among other activities, mentoring, leadership activities, tutoring and help with homework.
	Target Date	5/31/2026
	Estimate the number and type of families that will benefit from the proposed activities	100 low- to moderate-income at-risk youth in approximately 75-80 families.
	Location Description	1500 Positive Place, Marshall TX and will serve youth city-wide.
	Planned Activities	Services will include, among other activities, mentoring, leadership activities, tutoring and help with homework. Recreational activities will also be available.
2	Project Name	Communities in Schools
	Target Area	City-wide
	Goals Supported	Public Services
	Needs Addressed	Youth services – case management for at risk youth
	Funding	\$5,000
	Description	Support salaries for in-school counselors providing case management and assistance to at-risk youth
	Target Date	5/31/36
	Estimate the number and type of families that will benefit from the proposed activities	The program will serve 50 youth in approximately 40 families
	Location Description	1608 E End Blvd N Marshall TX 75670

	Planned Activities	Provide case management and counseling to 50 at risk youth in Marshall ISD schools
3	Project Name	Harrison County Literacy Center
	Target Area	City-wide
	Goals Supported	Public Services
	Needs Addressed	Adult Education – ESL education, basic skills, job readiness education
	Funding	CDBG: \$2,500
	Description	Provide assistance to 5 adults for literacy education, GED/employment preparation and training in adult basic skills to prepare adults for employment at a livable wage or improve their reading ability to better manage in the community.
	Target Date	5/31/2026
	Estimate the number and type of families that will benefit from the proposed activities	The Literacy Center will provide services to 8 adults with either limited literacy or English as Second Language in approximately 6 families.
	Location Description	114 E Grand Ave, Marshall TX and will serve adults city-wide.
4	Planned Activities	The Literacy Center will provide ESL, general literacy education, and GED classes as well as other adult basic education and job readiness classes to 5 adults.
	Project Name	Mission Marshall Food Bank
	Target Area	City-wide
	Goals Supported	Public Services
	Needs Addressed	Nutritious food to address food insecurity of low-income households
	Funding	\$18,000
	Description	Mission Marshall Food Bank will provide on-site or delivered supplemental or emergency food to 750 persons in approximately 500 households
	Target Date	5/31/2026
	Estimate the number and type of families that will benefit from the proposed activities	Approximately 500 low-income households, including 10 homeless households.

	Location Description	2109 S. Washington Ave, Marshall TX and will serve residents city-wide
	Planned Activities	The City will provide funding to Mission Marshall to secure and distribute food to needy families and individuals throughout the city. Funding will assist in supporting direct-service staff.
5	Project Name	Homeless Assistance
	Target Area	City-wide
	Goals Supported	Public Services
	Needs Addressed	Identifying and assisting homeless individuals and households
	Funding	\$8,885
	Description	The City of Marshall will manage the program to provide essentials to homeless individuals and families, prepare identification cards for them, provide transportation in Marshall or to neighboring shelters, and other essentials as needed
	Target Date	5/31/2026
	Estimate the number and type of families that will benefit from the proposed activities	Approximately 15- homeless households will be assisted this first year. It is estimated that 19 will be individuals and 6 will be families.
	Location Description	401 S. Alamo Blvd, Marshall TX 75670
	Planned Activities	The City will provide funding to begin implementing a plan to identify and assist homeless persons in Marshall by helping them complete registration for the MPA housing lists and provide transportation to either MPA for permanent housing or Salvation Army for shelter.
6	Project Name	GWC Community Center Roof
	Target Area	CDBG Target Areas
	Goals Supported	Facility Improvement
	Needs Addressed	The neighborhoods around GWCCC lack sufficient places to hold special events, various classes, and recreation. In PY 2023, the outdoor recreation areas were completed and for PY 2025 a roof is needed.
	Funding	CDBG: \$124,000
	Description	The GWCCC is located in the former GWC Elementary School and is being renovated as a needed community center. Funding this year will be used to replace the roof.

	Target Date	5/31/2026
	Estimate the number and type of families that will benefit from the proposed activities	Approximately 1,500 persons in 600 households/families including 700 children and youth in the CDBG Target Areas will benefit from having a community center in their neighborhood.
	Location Description	2302 Holland, Marshall TX
	Planned Activities	The center will replace the roof
7	Project Name	NET Habitat Housing Rehabilitation
	Target Area	City-wide
	Goals Supported	Housing Rehabilitation
	Needs Addressed	Owner Occupied Housing Rehabilitation
	Funding	CDBG: \$73,753
	Description	Provide minor and moderate critical rehabilitation to approximately 5 homes owned and occupied by low- to moderate-income residents throughout the city.
	Target Date	5/31/2026
	Estimate the number and type of families that will benefit from the proposed activities	5 households, including an estimated 2 families and 3 individuals in owner-occupied homes, most being elderly and/or disabled, will benefit from having critical repairs to make their homes safer and more energy efficient.
	Location Description	Habitat for Humanity, 905 McCann Rd, Longview TX and will provide services city-wide in Marshall.
	Planned Activities	Fund Habitat for Humanity to conduct minor to moderate rehabilitation of 5 owner-occupied homes.
8	Project Name	Twelve-Way Residential Treatment Facility
	Target Area	City-wide
	Goals Supported	Homeless Assistance
	Needs Addressed	Housing for Homeless and At Risk homeless with substance use disorders
	Funding	\$26,900
	Description	The residential program for men with substance use disorders who have either been released from an institution, were homeless upon entry, or were at imminent risk of homelessness will install commercial washer and dryer for use by the residents

	Target Date	5/31/2026
	Estimate the number and type of families that will benefit from the proposed activities	20 individual men, no families
9	Location Description	2024 Program Administration
	Planned Activities	Not Applicable
	Goals Supported	Program Administration
	Needs Addressed	Not Applicable
	Funding	\$60,486
	Description	Provide program management, planning and administration for Marshall's CDBG program, including the development of a new 5-Year Consolidated Plan and updating other related plans.
	Target Date	5/31/2026
	Estimate the number and type of families that will benefit from the proposed activities	Not Applicable
	Location Description	401 S. Alamo Marshall, TX 75672
	Planned Activities	Administer and manage the CDBG Program, work with area stakeholders to develop viable plans for increased affordable housing, homeless enumeration/shelter/services, economic development, and area-based improvements. Because the City staff involved in administering the CDBG program are relatively new to HUD programs, they will be supported by a contract consultant and by a HUD-provided Technical Assistance provider.

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

As part of the development of the Consolidated Plan, the City developed a cohesive Target Area, labeled Westside, that includes four predominately residential Census block groups totaling 4,318 residents. It is bounded along block group boundaries on the east by Washington Ave, roughly on the west by MLK Blvd, roughly on the north by W. Grand Ave (Hwy 80), and on the south by Pinecrest Dr (Hwy 43). It has the highest concentration of low- to moderate-income households aggregated at 61.8%, and ranging up to 85.6%. It also has the highest percentage of BIPOC at 83.1%, with two of the block groups being 100% BIPOC. The population is 66.7% African American and 14.7% Hispanic. The area also has the highest concentration of older housing with 2.7.7% having been constructed before 1950. Westside has the highest percent of overcrowded housing units at 10.1%. Nearly half of the households in the area have a housing cost burden of greater than 30% of income. It also has a 20% vacancy rate with the majority for an undetermined reason other than for sale, rent, sold or rented but not occupied, or for seasonal or migrant use. The New Town Neighborhood overlaps much of the Westside area and has an active Neighborhood Association that can facilitate the implementation of projects in the overlapping area.

Geographic Distribution

Target Area	Percentage of Funds
Westside	37.4%

Table 56 - Geographic Distribution

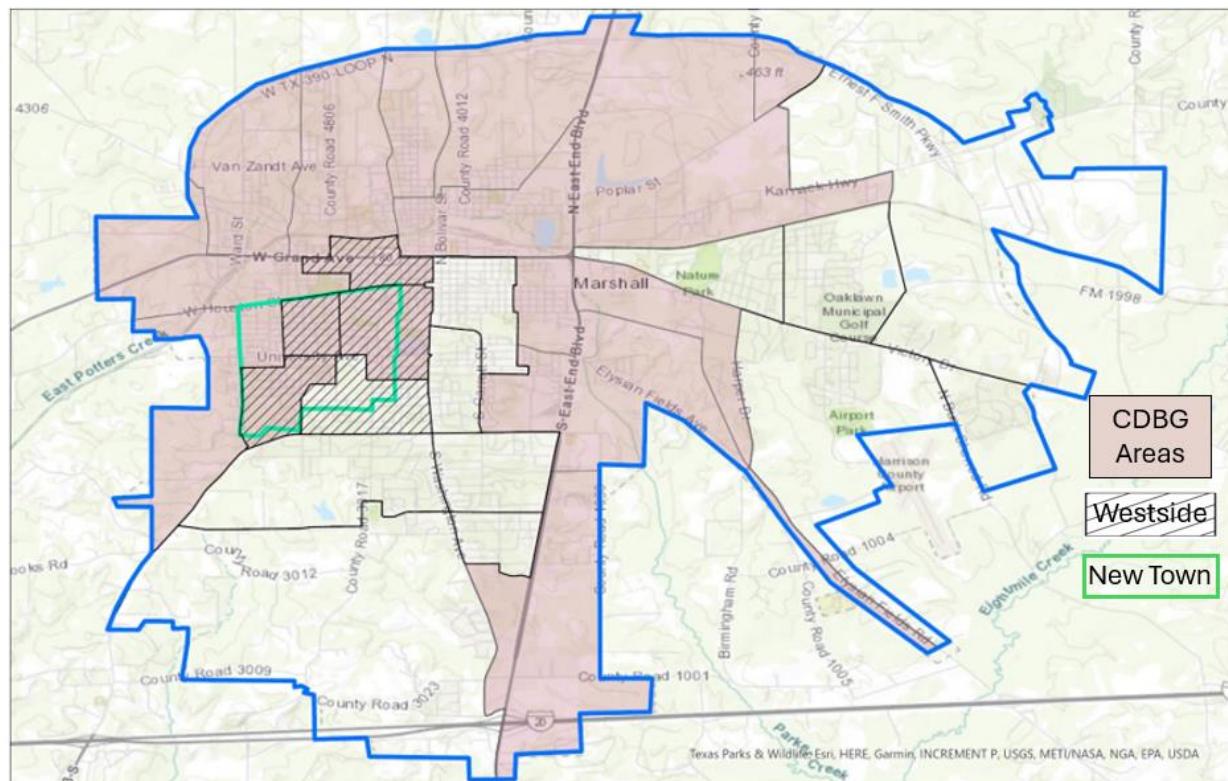
Rationale for the priorities for allocating investments geographically

As stated above, this primarily residential area has the highest percentages of low- to moderate-income households, BIPOC population, older homes with the highest vacancy rate and overcrowding, as well as a high percentage of cost-burdened households. In addition, Wiley University, an HBCU school committed to participating in neighborhood revitalization, is located in the area. Mission Marshall, which provides a number of services including a food pantry is located immediately inside the southeast corner of Westside. A hospital and city park are also on the eastern edge immediately inside the area. Smith Park, which was renovated with CDBG funds in PY 2024, is in the center of the area and GWC CC is in the southwest corner. Other than the above-mentioned amenities, there is a dearth of services and businesses in Westside, though there are many opportunities through partnerships between the City, New Town Association,

Wiley University and the board of directors of the GWC CC.

Discussion

For PY 2025, the City is appropriating 37.4% of the annual allocation, totaling 45.9% of the non-administrative allocation, to the George Washington Carver Community Center in the portion of Westside which is overlapped by New Town. The Community Center also serves a large CDBG-eligible block group to its west. Though a city-wide program, Mission Marshall is located within Westside and will receive \$17,000 in public service funds for its food pantry.



Affordable Housing

AP-55 Affordable Housing – 91.220(g)

Introduction

One Year Goals for the Number of Households to be Supported	
Homeless	0
Non-Homeless	5
Special-Needs	0
Total	5

Table 57 - 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	0
Rehab of Existing Units	5
Acquisition of Existing Units	0
Total	5

Table 58 - One Year Goals for Affordable Housing by Support Type

Discussion

NET Habitat for Humanity will provide housing rehabilitation to 5 owner-occupied homes in order to provide safer and more cost effective homes, preventing homelessness. Marshall does not receive HOME funds. There are no programs in place at this time for demolition/reconstruction for unsound owner-occupied homes. Additionally, at this time, Marshall has no homeless shelters and the City does not receive ESG funds. However, the PY 2025 program will provide funding for a residential treatment facility for men who entered homeless or at imminent risk of homelessness due to a substance use disorder. In some cases the graduates of the program are allowed to stay in the facility as transitional housing or permanent supportive housing. The funds will be used for a washer and dryer and not for actual housing services.

AP-60 Public Housing – 91.220(h)

Introduction

The Marshall Housing Authority has recently entered into the process of a voluntary conversion of public housing units to tenant-based assistance. HUD has approved the conversion, but has since placed a hold on the completion. The properties will be transferred to Marshall-Harrison County Public Facility Corporation (MHCPC), a non-profit organization that will continue maintaining and improving the two properties using funds from Section 8 Tenant-Based Vouchers. The 50 units at Oak Leaf Village will remain for the elderly and disabled. Recently, the MHA's Troubled PHA status removed and is now a Standard PHA.

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

Marshall Public Housing Authority will be completing its transition of two public housing developments to Housing Choice Voucher programs. Enrollment policy changes have allowed for the implementation of: homeless individuals and families as well as foster children who have aged out of the system, victims of sexual violence, and elderly or disabled persons will receive priority placement when openings arise. MHA is committed to working with the City and any applicants for Low Income Housing Tax Credits or other subsidies who are constructing single-family homes for homeownership.

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

With the conversion of the two public housing developments to HCVs, there will be no public housing residents in public housing per se. The organization that will be managing the former public housing developments will be encouraging resident involvement though it will not be under the purview of the Housing Authority.

During PY 2025, the MHA will continue its efforts to qualify as a Housing Counseling Agency and expand its Section 8 Homeownership Program. MHA is working with Habitat for Humanity to include mechanisms for Section 8 Homeownership tenants to purchase newly constructed homes in Harrison County.

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

Not Applicable

Discussion

Marshall Housing Authority will continue to collaborate with the City and other entities to investigate and implement new projects that will create additional affordable housing units and will expand its homeownership program to allow more HCV residents to purchase an affordable home. MHA continues to apply for additional Housing Choice Vouchers to expand the availability of sound housing for low-income residents. The housing authority also supports developers applying for Low-Income Housing Tax Credits (LIHTC) to convert or construct affordable housing in Marshall.

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

Introduction

There are no active homeless shelters in Marshall at this time. One of the primary reasons is that there are few homeless individuals willing to reside in a shelter. In the past, many of those staying in a shelter are transients, traveling through Marshall from one larger city to another and staying only a night or two in Marshall. As a result, it has been difficult for shelters to be awarded grant funds or donations to remain solvent.

The CDBG team is developing a plan to address the needs of the residents who find themselves unhoused. One of the key elements of developing and implementing the plan is the development of a coordinated entry process. During PY 2025 and PY 2026, the CDBG team intends to devote time and CDBG resources to interact with the unhoused individuals, those at risk of homelessness, and agencies that are providing specialized limited-time housing to determine the needs and the services available in Marshall. Through coordination with the agencies and involvement with the residents, a plan can be developed and implemented to expand the system and guide the unhoused through the portals.

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

Beginning in January of 2024, the CDBG Coordinator established a local Point in Time (PIT) and Housing Inventory Count (HIC) process to ensure that Marshall's homeless individuals were identified, counted, and engaged. The PIT and HIC were successful and the CDBG Coordinator has remained involved with those with whom she engaged during the counts. Their situations and challenges are leading toward the development of a Marshall-based homeless services plan along with either involvement in the North East Texas Homeless Consortium or the establishment of a Harrison County Homeless Coalition.

In addition, the CDBG team has begun educating TwelveWay, a residential recovery program, and East Texas Open Door, a therapeutic foster care program for girls under CPS care, to develop the capacity for securing Texas Emergency Solutions Grant and Continuum of Care funds for transitional and permanent supportive housing, and rapid rehousing for those men and young women exiting their programs.

Addressing the emergency shelter and transitional housing needs of homeless persons

The CDBG team is in the process of engaging the unhoused and the agencies providing residential

services for those populations who will become homeless upon completion of their programs to determine the needs and the solutions that the individuals are willing to accept. At this time there are no active emergency shelters in Marshall however, the Tracy Andrus Foundation is in the process of converting the former City Jail into an emergency shelter. Once the conversion is near completion and local, state, and federal codes and housing quality standards are met CDBG funds would be available to ready the facility to housing the unsheltered.

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

During PY 2025, the CDBG team will be working with TwelveWay and East Texas Open Door to utilize existing facilities to provide transitional housing for those exiting their programs. TwelveWay will likely maintain units for permanent supportive housing and East Texas Open Door will likely continue to support the women in educational pursuits, job training and independent living skills in order for them to successfully transition into independent living.

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

Both TwelveWay and East Texas Open Door are institutional systems through which residents move to completion and exiting. The CDBG team will be working with both organizations to educate their directors on the potential funding sources that might be available for continuing the care and transitional housing needs of the exiting residents, including the expansion of the existing programs to provide transitional housing or permanent supportive housing, both with continued education and support aimed at independent living.

Discussion

PY 2024 has been the initiation of a homeless services plan, beginning with Marshall's first PIT and HIC surveys. The PY 2025 Annual Action Plan includes \$8,885 in CDBG funds for homeless assistance which will include engaging with the identified homeless on a regular basis, providing essential needs, and involving them in the identification of underlying needs and recommendations on solutions. Additionally, the team will continue discussions with TwelveWay and East Texas Open Door, as well as Marshall Housing

Authority to develop plans for transitional and permanent supportive housing, and services to foster independent living. Once the Tracy Andrus Foundation and any other homeless shelters are in a position to receive certificates of occupancy for housing and meet the housing quality standards of Texas and HUD, then CDBG funds may be available for supplying some of the needs of the clients.

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

Introduction:

Overall, Marshall is a very affordable city when compared with other Texas communities, and especially compared with the nation. According to the 2019-2023 ACS, the median value of owner occupied housing is \$133,00 and the median rent is \$929. However, Marshall has not experienced growth since 1990, therefore there has been very little new housing. The values and rents are relative to the age of the dwellings. The median age of the housing in Marshall is 54 years, with 21.7% built before 1950. Despite the affordable cost to purchase much of the housing in Marshall, the additional cost for renovation makes the purchase unaffordable. Additionally, the city is predominately single family, with 77% of all housing single-family detached. The second most prevalent housing type are those with three to four units per structure at 6% of total housing, followed by mobile homes at 3.7%. Only 1% of the housing is in multi-family complexes with 50 or more units.

The lack of multi-family units is more a function of the age of the housing – built before the rise in multi-family housing -- and the lack of growth in the city rather than the land use regulations. The most recent review of public policies has been that there are none that limit or affect the return on residential investments through undue taxes, fees, zoning regulations or building codes. The City has continued to apply flexibility in zoning requirements when appropriate to encourage in-fill housing development, particularly affordable housing development. The latest Home Mortgage Disclosure Act (HMDA) information shows that in 2023 there were 688 loan applications for home purchase. 195 mortgage originations for home purchase with an average loan amount of \$114,500 and average income of \$88,000.

There continues to be a substantial number of abandoned properties in Marshall. The City is unable to foreclose on them without clear title or location of owners. Many of the properties, especially infill lots in Westside, cannot be acquired by the City and donated or sold for construction or demolition/reconstruction of affordable housing due to legal issues over ownership. A significant issue is that of heirs' property where the lots or homes has been informally inherited without clear title, preventing resale. This usually occurs when the property owner doesn't have, or cannot locate, clear title or dies intestate. Often older properties have conflicting boundary lines where the yards and houses don't conform to the legal surveys. In some cases the potential heirs have no knowledge of the death and the courts have no knowledge of the heirs.

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

Despite the fact that rents are lower in Marshall than most other cities in the state, the incomes also are significantly lower, limiting the affordability of housing. The housing stock is predominately single family and older. The low market rates coupled with the declining population cause housing developers to look elsewhere to develop profitable housing. The City is committed to expanding its collaboration with housing and social service providers to develop strategies to create more affordable housing units while increasing incomes.

One of the goals of the CDBG team during the next program year is to work with the East Texas Heirs' Property Initiative that is developing a model to address the issue in East Texas. They are currently supporting 12 locations and it is the interest of Marshall to become one of their new collaborators. Resolving the issue of the Heirs' Property in Westside coupled with locating and encouraging one or more developers to build affordable single-family homes in Westside would alleviate a significant housing cost burden for homeowners and the issue of unsound living conditions.

The Housing Authority continues to educate landlords on the advantages of accepting Housing Choice Vouchers and in assisting program participants in finding the highest quality housing that accommodates their needs. During PY 2023 – 2024 MHA sought approval by HUD to convert its two public housing developments into Housing Choice Voucher units managed by a separate non-profit organization. MHA hosts homeownership workshops at least annually and up to three times per year for the Housing Choice Voucher residents. These workshops are in collaboration with Cadence Bank. The program includes credit repair assistance to ready the residents for applying for a mortgage. The goal is to move HCV residents into their own home, with the resulting benefit of freeing up the HCVs that they held prior to purchasing a home.

The City is also committed to fairly reviewing all Marshall LIHTC applications to the State and to support the process with special use permits and other adjustments as needed.

Discussion:

Housing in Marshall is less costly than Texas as a whole and than most CDBG entitlement cities. However, incomes are also less than most of Texas. Housing is only affordable when it is in line with incomes. Housing in Marshall is also older than in most of Texas, resulting in added repair costs and higher utility bills, or living in unsound housing. As a result, 51.8% of renters and 17.9%

of homeowners have a housing cost burden of greater than 30% of their income. Renters are especially burdened due to the shortage of multi-family developments, particularly subsidized units such as Low Income Housing Tax Credit Properties. Ordinances are not prohibiting development in Marshall, however the population has been stagnant since the 1990s which is a deterrent to new development.

The Housing Authority's move to convert the two public housing developments into Housing Choice Vouchers and their continued work to convince more landlords to accept HCVs has aided in providing affordable housing of choice to low-income renters.

AP-85 Other Actions – 91.220(k)

Introduction:

As Marshall begins a new 5-Year Consolidated Planning Program, the CDBG team has determined that the key goal of the prior three years has been addressed and two new areas of focus will be highlighted. During the past Consolidated Planning period, improving public facilities was a key priority. George Washington Carver Elementary School has become George Washington Carver Community Center, with \$192,068 in CDBG funds invested in renovations and expansions. An additional \$124,000 will be allocated in PY 2025 to replace the roof. Anointed Grace and its founders have matched a vast majority, if not all, of the \$192,068 with the purchase and interior renovations. Smith Park has received \$285,000 for renovations and enhancements. During the development of this Consolidated Plan two new program areas became a focus: addressing the needs of the unhoused and those at risk of losing shelter and addressing the complex issue of affordable housing due in great part to the high rates of abandoned housing in need of demolition and reconstruction. The CDBG team will be focusing on identifying organizations to address these needs and funding to help support their efforts.

Actions planned to address obstacles to meeting underserved needs

The primary obstacle in meeting underserved needs in Marshall is the disconnect between organizations quietly attempting to serve the populations in need and the funders, including the City, in awareness of their existence and their financial gaps. The CDBG team has become aware of organizations that are “in the trenches” serving the very populations that have the greatest need. When the team reached out to these agencies it was discovered that they have been unaware of funding sources beyond private donations that could potentially meet their needs to expand their programs.

Actions planned to foster and maintain affordable housing

Funding will continue to be granted to NET Habitat for Humanity for minor to moderate repair of housing owned and occupied by low- to moderate-income households. During PY 2025, the CDBG team will be focusing attention on the housing issues in Westside which has an abundance of abandoned condemned dwellings that could be acquired, demolished and reconstructed as affordable single family housing low- to moderate-income households. There are legal hurdles and the challenge of identifying developers willing and able to secure the funding and take on the risk in order to build units on the infill lots. The CDBG team is striving to identify organizations or individuals willing to provide training on the heir housing issue and other issues surrounding acquiring abandoned lots and dwelling; and those interested in tackling the task of converting

blighted lots into affordable housing.

Actions planned to reduce lead-based paint hazards

All dwellings to be rehabilitated through NET Habitat for Humanity are evaluated and those constructed prior to 1978 and will have any paint disturbed during the rehab process will undergo lead-based paint testing. When abandoned houses are demolished and lots with previous structures are cleared for the reconstruction of housing, the soil and the structures will be tested for lead-based paint residue and properly abated based as required by federal law.

Actions planned to reduce the number of poverty-level families

The City will fund Marshall-Harrison County Literacy Center to provide ESL education, literacy classes and GED assistance to adults. The result will be better employment options that will move families out of poverty. After school tutoring by Boys and Girls Club is proving to be successful in raising educational achievement by the youth. Communities in Schools (CIS) also works to improve educational achievement in the students with whom they work as well as to reduce drop outs and misbehaviors. CIS provides case management not only for the at-risk students but also their families. Both programs have shown that participation leads to better behaviors, better grades, more motivation, all of which lead to greater potential to succeed after graduating. Marshall Housing Authority's homeowner workshops provide the attendees with financial counseling and credit counseling that provides a hope that they will soon be able to purchase a home. Eliminating credit debt definitely reduces poverty, and homeownership provides a sense of stability and pride that keeps the new owners working toward improving their financial state.

Actions planned to develop institutional structure

Work begun in PY 2024 will be expanded in PY 2025 as the CDBG team reaches out to more organizations providing training on addressing homelessness and affordable housing; organizations providing services to the under-resourced; and other agencies that might provide funding to the organizations identified. The team is continuing to develop a homeless plan and an affordable housing plan that can be implemented during the next decade. One of the elements of the homeless plan will be to determine if increasing participation in the North East Texas Homeless Consortium or creating a Harrison County Homeless Coalition would be more advantageous for Marshall.

The CDBG Coordinator will continue to attend as many online and in-person trainings and meetings as possible and the CDBG team will continue to work to inform management and relevant City staff of CDBG purposes and regulations.

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

service agencies

The CDBG team will continue to build relationships with social service agencies as well as with organizations that provide residential treatment and residential foster care to at-risk individuals. During PY 2025, the team will reach out to experts in the area of infill housing development to encourage reputable builders of affordable housing to address the issue of abandoned housing in Westside by acquiring, demolishing and reconstructing affordable housing, which will help alleviate the shortage for the entire city.

Discussion:

Half of the population in Marshall is low- to moderate-income making addressing all of the needs difficult, especially with a CDBG team of one Coordinator and one consultant. However, the team is identifying, reaching, and coordinating with private sector organizations that are serving the under-resourced population. In addition, the CDBG Coordinator is expanding interaction with the beneficiaries of the programs, particularly homeless individuals and those in group quarters facilities. One of the primary goals of PY 2025 is to educate organizations in the funding that is available at the state and federal levels and how to apply. It is time for Marshall residents to benefit from these housing, homeless, and social service funding that is available.

Program Specific Requirements

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

Introduction:

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	\$0.00
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	\$0.00
3. The amount of surplus funds from urban renewal settlements	\$0.00
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.	\$0.00
5. The amount of income from float-funded activities	\$0.00
Total Program Income	

Other CDBG Requirements

1. The amount of urgent need activities	\$0.00
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1. If applicable to a planned HOME TBRA activity, a description of the preference for persons with special needs or disabilities. (See 24 CFR 92.209(c)(2)(i) and CFR 91.220(l)(2)(vii)).

Not Applicable

Appendix - Alternate/Local Data Sources

1	Data Source Name Marshall Housing Authority Management Data
	List the name of the organization or individual who originated the data set. Marshall Housing Authority
	Provide a brief summary of the data set. The data set shows the current count of public housing households and Section 8 HCV households.
	What was the purpose for developing this data set? It is maintained by MHA for management, administrative and documentation purposes
	How comprehensive is the coverage of this administrative data? Is data collection concentrated in one geographic area or among a certain population? The data is comprehensive and includes all MHA residents.
	What time period (provide the year, and optionally month, or month and day) is covered by this data set? March 2015
	What is the status of the data set (complete, in progress, or planned)? Complete
2	Data Source Name PIC (PIH Information Center)
	List the name of the organization or individual who originated the data set. Marshall Housing Authority
	Provide a brief summary of the data set. Information provided by the Marshall Housing Authority
	What was the purpose for developing this data set? The purpose of the 2020-24 Con Plan for the City of Marshall
	How comprehensive is the coverage of this administrative data? Is data collection concentrated in one geographic area or among a certain population? concentrated to the Marshall Housing Authority Jurisdiction.
	What time period (provide the year, and optionally month, or month and day) is covered by this data set? 3-1-2020
	What is the status of the data set (complete, in progress, or planned)? Complete

3	<p>Data Source Name 2020 Decennial Census</p>
	<p>List the name of the organization or individual who originated the data set. U.S. Census Bureau</p>
	<p>Provide a brief summary of the data set. Decennial Census of population -- PL94 -- for 2020 at the block, block group, census tract, and city limit boundaries</p>
	<p>What was the purpose for developing this data set? determine the best 100% count data collected at the smallest geographic level and the date closest to the Consolidated Plan.</p>
	<p>Provide the year (and optionally month, or month and day) for when the data was collected. 2020</p>
	<p>Briefly describe the methodology for the data collection. U.S. Census methodology</p>
	<p>Describe the total population from which the sample was taken. United States at various sub-levels down to the census block.</p>
	<p>Describe the demographics of the respondents or characteristics of the unit of measure, and the number of respondents or units surveyed. N/A -- national count at a variety of geographic levels.</p>
4	<p>Data Source Name HUD CHAS Data Set</p>
	<p>List the name of the organization or individual who originated the data set. U.S. Census Bureau for U.S. Department of Housing and Urban Development</p>
	<p>Provide a brief summary of the data set. Cross-tabulates income data by various household and racial/ethnic compositions at the block group level.</p>
	<p>What was the purpose for developing this data set? to determine the demographics and level/type of need in block groups</p>
	<p>Provide the year (and optionally month, or month and day) for when the data was collected. 2016-2020 -- monthly small surveys</p>
	<p>Briefly describe the methodology for the data collection. U.S. Census American Community Survey methodology, tabulated for HUD</p>

	<p>Describe the total population from which the sample was taken.</p> <p>United States at tract and block group level</p>
	<p>Describe the demographics of the respondents or characteristics of the unit of measure, and the number of respondents or units surveyed.</p> <p>For the Consolidated Plan, city residents at the block group level</p>