

City of Hesperia

CONSOLIDATED ANNUAL PERFORMANCE AND EVALUATION REPORT (CAPER)

Program Year 2021-2022

Draft - September 20, 2022

Prepared by:



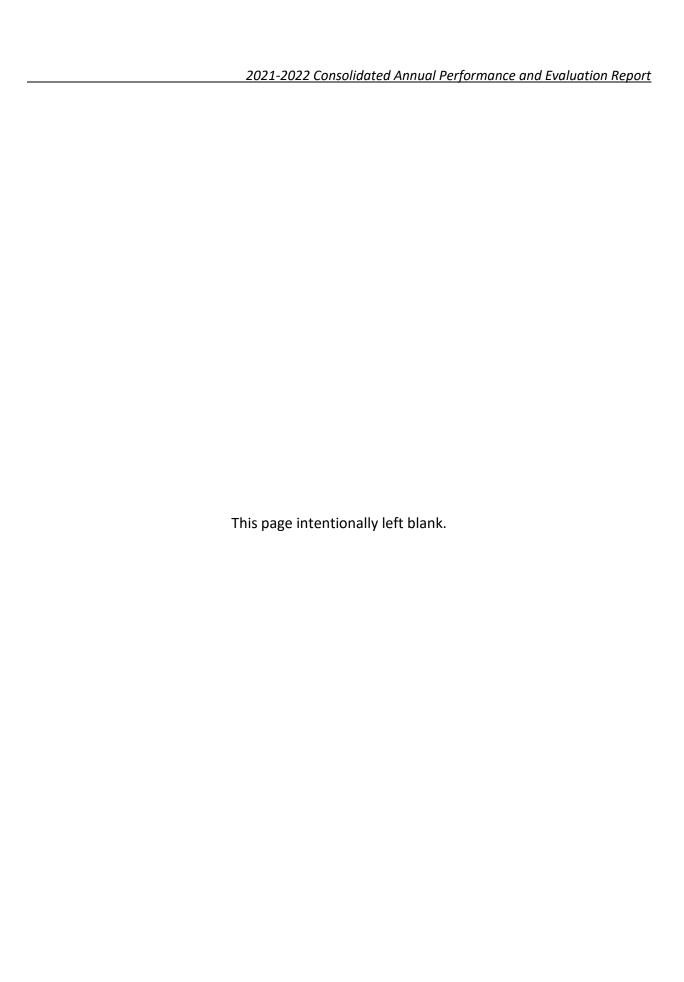
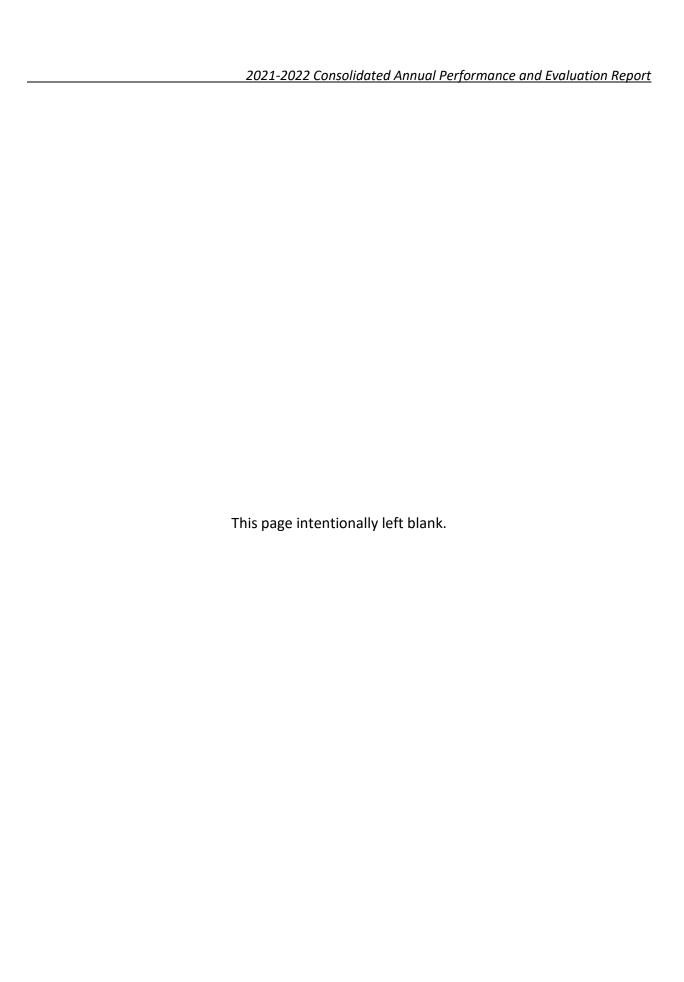


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CR-05 - Goals and Outcomes

Progress the jurisdiction has made in carrying out its strategic plan and its action plan. 91.520(a)

This 2021-2022 Consolidated Annual Performance and Evaluation Report (CAPER) is the City of Hesperia's (City) report to the U.S. Department of Housing and Urban Development (HUD) describing the use of federal Community Development Block Grant (CDBG) funds during the second program year of the 2020-2024 Consolidated Plan period, covering July 1, 2021, to June 30, 2022.

The City receives CDBG funds from HUD on a formula basis each year, and in turn, implements projects and awards grants and loans to nonprofit, for-profit or public organizations for projects in furtherance of the adopted Consolidated Plan. The CDBG program generally provides for a wide range of eligible activities for the benefit of low- and moderate-income City residents.

For the 2021-2022 program year, the City received \$992,601 of CDBG funds. In addition, the City repurposed \$110,000 in prior year CDBG funds for a total 2021-2022 program year budget of \$1,102,601. The investment of CDBG funds was a catalyst for positive change in the community. Together with other federal, state, and local investments, HUD resources allowed the City and its partners to:

- Provide fair housing and landlord tenant mediation services to 404 unduplicated residents
- Complete the reconstruction of streets encompassed in the City's 2020-2021 Street Improvement Project that benefited 3,485 residents.
- Commence procurement efforts for design and engineering services for the City's 2021-2022 Street Improvement Project which is projected to assist approximately 1,000 unduplicated City residents.
- Award and commence construction of the City's Peach Avenue Drainage Improvement
 Project which will benefit 11,140 residents (project anticipated to be completed during
 the 2022-2023 program year).

Table 1 provides a summary of the five-year and one-year accomplishments for the period ending June 30, 2022, arranged by each of the Strategic Plan Goals included in the 2020-2024 Strategic Plan of the Consolidated Plan.

Comparison of the proposed versus actual outcomes for each outcome measure submitted with the consolidated plan and explain, if applicable, why progress was not made toward meeting goals and objectives. 91.520(g)

Categories, priority levels, funding sources and amounts, outcomes/objectives, goal outcome indicators, units of measure, targets, actual outcomes/outputs, and percentage completed for each of the grantee's program year goals.

Table 1 - Accomplishments – Program Year & Strategic Plan to Date

Goal	Category	2021-2022 Amount	Indicator	Unit of Measure	Expected – 5- Yr. Strategic Plan	Actual – Strategic Plan	Percent Complete	Expected Program Year	Actual Program Year	Percent Complete
Public Facility and Infrastructure Improvements	Non-Housing Community Development	CDBG: \$987,601	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit	Persons Assisted	20,000	7,485	37%	12,140	3,485	29%
Economic Opportunity	Non-Housing Community Development	CDBG: \$0	Businesses Assisted	Businesses Assisted	30	0	0%	0	0	0%
Fair Housing Services	Affordable Housing	CDBG: \$15,000	Public service activities other than Low/ Moderate Income Housing Benefit	Persons Assisted	650	153	24%	73	63	86%
50VID 40 D	19 Response COVID-19 CDBG: \$0	CDBG:	Jobs Created/Retained	Persons Assisted	25	0	0%	0	0	0%
COVID-19 Response		\$0	Homelessness Prevention	Persons Assisted	80	50	63%	0	0	0%
Administration	All	CDBG: \$100,000	Fund the needs of the administration to run the CDBG Program	N/A	N/A	N/A	N/A	N/A	N/A	N/A

Assess how the jurisdiction's use of funds, particularly CDBG, addresses the priorities and specific objectives identified in the plan, giving special attention to the highest priority activities identified.

During the program year, the City and its housing and community development partners made progress on several 2021-2022 activities as well as some multi-year activities that continued during the program year. All CDBG funded activities addressed specific high priority objectives identified in the 2020-2024 Consolidated Plan.

Through City leveraged dollars under the Community Assistance Program (CAP), the City was able to fund a total of 11 public service agencies who provided services including but not limited to food banks, senior/disabled adult services, shelter and shelter services and veteran services. Together these agencies were able to assist a total of 11,530 City residents. The City's fair housing and landlord tenant mediation service provider, Inland Fair Housing and Mediation Board (IFHMB) was able to provide services to a total of 404 unduplicated City residents (63 Fair Housing and 341 Landlord Tenant Mediation). In addition, the City was able to complete the 2020-2021 Street Improvement Project which provided a benefit to 3,485 unduplicated residents. Always forwarding thinking, the City issued a Request for Qualifications for engineering and design services for the 2021-2022 Street Improvement Project. Design and engineering efforts are expected to commence in the second quarter of 2022-2023 program year with the project expected to be awarded during the third quarter of the 2022-2023 program year. Lastly, the City awarded and commenced construction on the Peach Avenue Drainage Improvement Project. The Project is estimated to benefit approximately 11,140 unduplicated residents.

The majority of CDBG funds were allocated to public facilities and infrastructure improvements to benefit low- and moderate-income individuals. Key accomplishments included the completion of the 2020-2021 Street Improvement Project and the commencement of construction on the Peach Avenue Drainage Improvement Project which will assist a vast number of residents throughout the City.

Each of the activities that were underway during the 2021-2022 program year are listed in **Figure 1**, including the amount of CDBG funds allocated to the activity and the amount spent as of June 30, 2022. **Figure 2** provides the numerical accomplishment goal and the amount accomplished as of June 30, 2022.

Figure 1 – Use of CDBG Funds

Strategic Plan Goal / Activity	Source	Allocation	Spent through 6/30/2022	Percent Spe
1. Public Facility and Infrastructure Improvements	45 Hz			51
2020 Street Improvement Project	CDBG	\$540,000.00	\$504,063.59	93.35
2021 Street Improvement Project	CDBG	\$174,639.00	\$0.00	0.00
Peach Avenue Drainage Improvement Project*	CDBG	\$1,860,641.93	\$1,380,848.75	74.23
	Subtotal	\$2,575,280.93	\$1,884,912.34	73.19
2. Economic Opportunity				
N/A	N/A	N/A	N/A	N
	Subtotal	N/A	N/A	N
3. Fair Housing Services (Subject to Admin CAP)				
2021 Inland Fair Housing and Mediation Board (IFHMB)	CDBG	\$15,000.00	\$13,844.10	92.29
	Subtotal	\$15,000.00	\$13,844.10	92.29
4. COVID-19 Response				
N/A	N/A	N/A	N/A	N/A
	Subtotal	N/A	N/A	N/A
5. CDBG Administration (Subject to Admin CAP)				
2021 CDBG Program Administration*	CDBG	\$100,000.00	\$48,293.13	48.29
	Subtotal	\$100,000.00	\$48,293.13	48.29
	Total for all Goals:	\$2,690,280.93	\$1,947,049.57	72.37
* Multi-Year Project				

Figure 2 – Program Year Accomplishments by Strategic Plan Goal

Unit of Measure	Expected	Actual	% Complete
People	1000	3485	348.50%
People	1000	0	0.00%
People	11140	0	0.00%
Subtotal	13140	3485	26.52%
N/A	N/A	N/A	N/A
Subtotal	N/A	N/A	N/A
People	73	63	86.30%
Subtotal	73	63	86.30%
N/A	N/A	N/A	N/A
Subtotal	N/A	N/A	N/A
N/A	N/A	N/A	N/A
Subtotal	N/A	N/A	N/A
is reported as persons se	rved		
	People People People Subtotal N/A Subtotal People Subtotal N/A Subtotal N/A Subtotal	People 1000 People 1000 People 11140 Subtotal 13140 N/A N/A Subtotal N/A People 73 Subtotal 73 N/A N/A N/A N/A N/A N/A	People 1000 3485 People 1000 0 People 11140 0 Subtotal 13140 3485 N/A

CR-10 - Racial and Ethnic composition of families assisted

Describe the families assisted (including the racial and ethnic status of families assisted). 91.520(a)

Table 2 – Table of assistance to racial and ethnic populations by source of funds

Race/Ethnicity	CDBG
White	292
Black or African American	95
Asian	2
American Indian or American Native	0
Native Hawaiian or Other Pacific Islander	0
Other	15
Total	404
Hispanic	219
Not Hispanic	185

Table does not account for 3,485 residents for 2020/2021 Street Imp. Project, data not available IFHMB amounts based on 404 for Fair Housing and Landlord Tenant Mediation Services

Narrative

Table 2 provides an aggregate of race and ethnicity data for persons and households served during the program year based on available accomplishment data from all CDBG activities reported in HUD's Integrated Disbursement and Information System (IDIS). For more detailed demographic information by project or activity, refer to the PR-03 report in **Appendix C**.

Based on the information in **Table 2**, a diverse array of persons and households benefitted from CDBG funded activities during the 2021-2022 program year.

CR-15 - Resources and Investments 91.520(a)

Identify the resources made available

Table 3 - Resources Made Available

Source of Funds	Resources Made Available	Amount Expended During Program Year
CDBG	\$1,102,601	\$1,536,980*

^{*} Includes amounts drawn from prior year activities

Narrative

The federal, state, local and private resources available for the implementation of projects during the 2021-2022 program year are identified in **Table 3**. The CDBG resources include \$1,102,601 of CDBG formula grant funds (includes current, prior year and program income) to be allocated to projects in the 2021-2022 Action Plan.

Identify the geographic distribution and location of investments

Table 4 – Identify the geographic distribution and location of investments

Target Area	Planned Percentage of Allocation	Actual Percentage of Allocation	Narrative Description
CDBG Low- and Moderate-Income CT/BG	90%	122%	2020/2021 Street Improvement Project, 2021/2022 Street Improvement Project and Peach Avenue Drainage Improvement Project At the end of June 30, 2022, a total of \$1,348,790 was drawn during the 2021/2022 PY (includes prior year activities)
Citywide	10%	6%	Fair Housing Services and Admin At the end of June 30, 2022, a total of \$62,137 was drawn during the 2021/2022 PY

Narrative

For the 2021-2022 program year, the City allocated \$987,061 of CDBG funds (includes prior year dollars) to Public Facilities and Infrastructure activities designed to benefit the Low-and Moderate-Income Areas, representing 90 percent of the City's total CDBG investment for the 2021-2022 program year. At the end of June 30, 2022, the City was able to draw a total of \$1,348,790 (includes prior year activities) during the 2021-2022 program year.

Leveraging

Explain how federal funds leveraged additional resources (private, state and local funds), including a description of how matching requirements were satisfied, as well as how any publicly owned land or property located within the jurisdiction that were used to address the needs identified in the plan.

To address housing and community development needs in the City, the City leveraged its CDBG entitlement grant with a variety of funding resources to maximize the effectiveness of available funds such as appropriate state, local and private resources. The City and its subrecipients were able to leverage approximately \$1,078,414 of additional funds to address identified needs in the plan. Other examples of funds that were leveraged but difficult to account for include but are not limited to those listed below:

Federal Resources

- Continuum of Care (CoC) Program
- HUD Veterans Affairs supportive Housing (HUD-VASH)
- Supportive Housing for the Elderly (Section 202)
- Supportive Housing for Persons with Disabilities (Section 811)
- Housing Opportunities for Persons with AIDS (HOPWA)
- Youthbuild
- Federal Low-Income Housing Tax Credit Program
- Department of Transportation Grants
- Department of Energy Grants
- Federal Highway Administration

State Resources

- State Low-Income Housing Tax Credit Program
- Building Equity and Growth in Neighborhoods Program (BEGIN)
- CalHome Program
- Multifamily Housing Program (MHP)
- Housing Related Parks Grant
- CalHFA Single and Multi-Family Program
- Mental Health Service Act (MHSA) Funding
- Prop 47 Board of State & Community Corrections
- Justice Assistance Grant (JAG) Program
- Homeless Emergency Aid Program (HEAP)

Local Resources

- San Bernardino County Homeless Partnership (SBCHP)
- Housing Authority of the County of San Bernardino (HACSB)
- Southern California Home Financing Authority (SCHFA) Funding
- San Bernardino County Continuum of Care Program
- Community Assistance Program (General Fund)

Private Resources

- Federal Home Loan Bank Affordable Housing Program (AHP)
- Community Reinvestment Act Programs
- United Way Funding
- Private Contributions

Matching Requirements

The CDBG regulations do not require a match contribution; however, the City encourages its awarded departments and agencies to leverage the CDBG funding to further aid in the assistance provided to its residents. As an example, the City leverages general fund dollars through its CAP program to award public service agencies in the administration of programs including but not limited to shelter services, food banks, senior services, and legal aid services. The City does not receive HOME or ESG funds as part of its allocation. The amount of matching funds is therefore not applicable for the 2021-2022 program year.

Publicly Owned Land or Property

The City did not have any publicly owned land or property located within the jurisdiction that was used to address the needs identified in the plan under the CDBG program.

CR-20 - Affordable Housing 91.520(b)

Evaluation of the jurisdiction's progress in providing affordable housing, including the number and types of families served, the number of extremely low-income, low-income, moderate-income, and middle-income persons served.

Table 5- Number of Households

	One-Year Goal	Actual
Number of homeless households to be		9
provided affordable housing units	0	0
Number of non-homeless households to		
be provided affordable housing units	0	U
Number of special-needs households to		0
be provided affordable housing units		0
Total	0	0

Table 6 - Number of Households Supported

	One-Year Goal	Actual
Number of households supported		
through rental assistance	0	0
Number of households supported		
through the production of new units	0	0
Number of households supported	0	
through the rehab of existing units	0	0
Number of households supported		•
through the acquisition of existing units	0	
Total	0	0

Discuss the difference between goals and outcomes and problems encountered in meeting these goals.

The City continued its conscious effort to streamline the CDBG program during the 2021-2022 program year. At the point of adoption of the 2021-2022 Action Plan, the City anticipated working on four (4) activities. Throughout the program year, the City did not come across many obstacles in meeting its goals. The City was able to complete its 2020-2021 Street Improvement Project. In addition, the City was able to advance on design and engineering efforts for the 2021-2022 Street Improvement Project. Lastly, the City awarded and commenced construction on the Peach Avenue Drainage Improvement Project, which is anticipated to be completed during the 2022-2022 program year.

Discuss how these outcomes will impact future annual action plans.

Due to the City's need to improve infrastructure, the City anticipates continuing to invest CDBG funds to address improving infrastructure through its Annual Street Improvement Project. The

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City has taken into consideration the needs for housing preservation and economic development in its community and has expressed its interest in the continuation of funding for its Energy Efficiency and Minor Repair Program (EEMR), Housing Rehabilitation Loan Program (HRLP), and Downtown Revitalization Commercial Façade Program during the 2020-2024 Consolidated Plan cycle.

Include the number of extremely low-income, low-income, and moderate-income persons served by each activity where information on income by family size is required to determine the eligibility of the activity.

Table 7 – Number of Persons Served					
Number of Persons Served	CDBG Actual				
Extremely Low-income	142				
Low-income	183				
Moderate-income	66				
Non-Low and Moderate-Income	13				
Total	404				

Table 7 - Number of Persons Served

Narrative Information

Although affordable housing needs are a high priority throughout California, during the 2020-2024 Consolidated Plan - Strategic Plan, the City did not identify affordable housing needs as a high priority. However, the City has taken into consideration the needs for housing preservation and economic development in its community and has expressed its interest in the continuation of funding for its Energy Efficiency and Minor Repair Program (EEMR), Housing Rehabilitation Loan Program (HRLP), and Downtown Revitalization Commercial Façade Program during the 2020-2024 Consolidated Plan cycle, via a Substantial Amendment.

To address what HUD defines as "worst case housing need" – low-income residents who pay more than 50 percent of their income for housing costs – the City works closely with the Housing Authority County of San Bernardino (HACSB) who provides rental assistance to low-income families either by housing families in the units HACSB owns and manages or by providing subsidized housing assistance to a landlord for renting their housing unit to eligible families. To meet the Section 215 definition of affordable housing, the City defines affordable rents as follows:

- For low-income households, 30 percent of 50 percent of the area median income adjusted for family size appropriate for the unit, less an allowance for tenant paid utilities, divided by 12.
- For moderate income households, 30 percent of 60 percent of the area median income adjusted for family size appropriate for the unit, less allowance for tenant paid utilities.
- For middle income households, 30 percent of 110 percent of the area median income adjusted for family size appropriate for the unit, less allowance for tenant paid utilities.

In addition, the City works collectively with HACSB by providing residents with educational pamphlets and workshops on the County's affordable housing programs. The City did not provide Homeownership Assistance during the 2021-2022 program year as the rise in sales prices and interest rates made it difficult for the City to provide sufficient funding to eligible households to help "cover the gap" in financing to allow for a more economical first mortgage payment.

CR-25 - Homeless and Other Special Needs 91.220(d, e); 91.320(d, e); 91.520(c)

Evaluate the jurisdiction's progress in meeting its specific objectives for reducing and ending homelessness through:

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

Preventing and ending homelessness is a HUD priority addressed nationally through coordination of regional strategies carried out locally by government agencies and a wide variety of community-based organizations and faith-based groups. Consistent with this approach, the City supports the efforts of the San Bernardino County Continuum of Care (CoC) and its member organizations that address homelessness throughout the County. In alignment with these strategies, the City has allocated general fund dollars to support local service providers that provided homelessness prevention services, homeless shelter and shelter related services.

In 2019, the State of California enacted the Homeless Housing Assistance and Prevention Program (HHAP – Round 1), which was a \$650 million block grant program to provide one-time grant funds to support regional coordination and expand or develop local capacity to move homeless individuals and families into permanent housing. The local recipient of these funds was the local CoC and the County. Subsequently, Round 2 was released, which provided \$300 million for supporting local jurisdictions continue to build on regional collaboration developed through previous rounds of Homeless Coordinating and Financing Council (HCFC) funding and to develop a unified regional response to homelessness. Applications for Round 3 funding, which will provide \$1 billion in grant funding, opened to eligible applicants in February of 2022, with the deadline scheduled to close on June 30th of 2022. The third round of funding provides local jurisdictions, including federally recognized tribal governments, with flexible funding to continue efforts to end and prevent homelessness in their communities.

The State of California has approved several other grant programs directed at addressing homelessness. The No-Place-Like-Home (NPLH) Program awarded \$2 billion to counties for the development of permanent supportive housing for persons who are in need of mental health services and are experiencing homelessness, chronic homelessness, or at risk of chronic homelessness. Through this program, Counties must commit to provide mental health services and help coordinate access to other community-based supportive services. Applications for Round 4 funding of the NPLH Program closed in mid-January of 2022. The Program expects to announce the awardees of the funds by June 2022. The State currently provides grants to counties through its Housing for a Healthy California (HHC) Program for permanent supportive housing for individuals who are recipients of or eligible for health care provided through the

California Department of Health Care Services, Medi-Cal program. The goal of the HHC program is to reduce the financial burden on local and state resources due to the overutilization of emergency departments, inpatient care, nursing home stays and use of corrections systems and law enforcement resources as the point of health care provision for people who are chronically homeless or homeless and a high-cost health user. Applicants who were previously awarded by the program for existing projects were funded in Spring of 2022. New applicants are anticipated to be awarded by the end of June 2022.

The CoC completed the inventory of existing access centers in the County noting the locations of each access center. The CoC also conducts informational outreach presentations concerning homelessness in the County.

In 2014 the County Sheriff's Department created a specific unit to engage the homeless. The mission of the Homeless Outreach Proactive Enforcement (H.O.P.E.) program takes a pro-active approach intended to ultimately reduce calls for service and other resources currently required to address the homeless population. The program also aims to balance pro-active outreach with enforcement of the law, while connecting members of the homeless population with resources that may help them transition from homelessness. The ultimate goal is to reduce the rate of recidivism and reduce the current costs associated to homeless related crime.

According to the Homelessness Action Plan, A Multi-Jurisdictional Approach in San Bernardino County, adopted in September 2019, the CoC is in the process of implementing several regional strategies that will enhance local coordination to assist people more effectively in need. To identify and assess people experiencing homelessness; the CoC has been working to create regional homeless access centers that will offer fully coordinated systems of outreach and will facilitate universal assessment, intake, referral and transportation to resources more rapidly. Collectively these strategies will help minimize duplication of efforts and better connect the most vulnerable individuals and families, chronically homeless, and people at risk of becoming homeless to appropriate resources.

In July 2021, the California COVID-19 Rent Relief Program was provided \$5.2 billion to cover 100% of past-due rent going as far back as April 2020, as well as current utility bills. The program assisted both landlords and tenants. By covering 100% of the rent owed by the tenants, the program helped to prevent tenants from being evicted and potentially homeless. The San Bernardino County Rent Relief Partnership (SBCRRP) functioned similarly to the CA COVID-19 Rent Relief Program. The SBCRRP covered 12 months of past-due rent, as well as utilities, going as far back as March 13, 2020. The SBCRRP shared the same goal as the CA COVID-19 RRP by protecting tenants from eviction and potential homelessness. As of March 31, 2022, the Program was no longer accepting new applications, but continued to assist

applicants whose applications were submitted before the deadline. Eviction protections in the state of California were extended for those whose applications were submitted before the deadline, protecting them through June 30, 2022.

Established in March of 2020, Project Roomkey provided a place outside a hospital to stay for those who are homeless as well as those recovering from and who were currently exposed to COVID-19. The program collaborated with the State and County to secure hotel and motel rooms to be used for these purposes. This program provided sheltering options for the homeless, seeks to protect human life, and minimized the capacity strain found within the health care system. The Program is scheduled to end by September 30th, 2022.

Through Project Roomkey; Homeless Housing, Assistance and Prevention (HHAP); HHAP CV funds and Continuum of Care, the region has assisted with housing and sheltering 2,000 unduplicated individuals since March 2020, nearly 800 of whom were referred to permanent housing. Project Homekey services included the Pacific Village project, which provided long-term interim shelter to 33 individuals in 28 units while the All-Star Lodge project provided long-term shelter to 50 individuals in 38 units.

Addressing the emergency shelter and transitional housing needs of homeless persons

The ultimate solution to ending homelessness is transitional to permanent housing closely aligned with supportive services that ensure housing stability can be maintained. However, because the demand for affordable housing far outpaces the region's supply, the CoC continues to rely on its emergency and transitional housing system to address the immediate needs of the County's homeless population.

The CoC is improving the efficacy of emergency shelters and the access system including their seasonal emergency shelters and the County's three (3) Cold Weather Shelter facilities, the closest being in the City of San Bernardino.

For transitional housing, the CoC recognizes a need to maintain a level of transitional housing for the target populations that benefit most from a staged approach to housing, such as mentally ill and chronically homeless individuals. While the CoC continues to support transitional housing in special circumstances, the CoC is currently examining ways to shorten stays in emergency shelters and transitional housing so that resources may be used for rapid rehousing or placement in permanent supportive housing.

In nearby City of Victorville, the Wellness Center Campus will be the first of its kind in San Bernardino County. The project was award and commenced construction in the 2021-2022 program year and is anticipated to be completed in December 2022. The Campus is anticipated to play a critical role in helping homeless individuals stabilize and rebuild their lives. The Campus will provide 170 beds and will allow the Wellness Center to serve several functions by

providing a low-barrier emergency shelter, recuperative care facility, medical clinic, interim housing and wrap around supportive services such as case management, care coordination, job training/placement and housing navigation.

Helping low-income individuals and families avoid becoming homeless, especially extremely low-income individuals and families and those who are: likely to become homeless after 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); and, receiving assistance from public or private agencies that address housing, health, social services, employment, education, or youth needs

An individual or family is considered to be at-risk of becoming homeless if it experiences extreme difficulty maintaining their housing and has no reasonable alternatives for obtaining subsequent housing. Homelessness often results from a complex set of circumstances that require people to choose between food, shelter, and other basic needs. Examples of common circumstances that can cause homelessness include eviction, loss of income, insufficient income, disability, increase in the cost of housing, discharge from an institution, irreparable damage or deterioration to housing, and fleeing from family violence.

The most effective and cost-efficient means to addressing homelessness is to prevent episodes of homelessness from occurring in the first place. The County's current CoC system encourages services aimed at reducing incidences of homelessness, including:

- Emergency Rental and Utility Assistance: Short-term financial assistance to prevent eviction and utility shut-off.
- Credit Counseling: Financial counseling and advocacy to assist households to repair credit history.
- Legal/Mediation Services: Tenant-landlord legal/mediation services to prevent eviction.
- Food Banks and Pantries: Direct provision of food, toiletries, and other necessities.
- Transportation Assistance: Direct provision of bus vouchers and other forms of transportation assistance.
- Clothing Assistance: Direct provision of clothing for needy families and individuals.
- Prescription/Medical/Dental Services: Direct provision of prescription, medical and dental services.
- Workforce Development: Direct provision of job training services designed to develop and enhance employment skills, as well as to help clients secure and retain living wage jobs.
- Information & Referral Services: Direct provision of 24-hour/7-days-a-week call center services to provide health and human service information to at-risk populations.
- Recuperative care for homeless individuals who become ill or injured.

The City will continue to work with and refer residents to the County's Department of Behavioral Health to ensure residents are provided the immediate attention and services they require to prevent homelessness and encourage self-sufficiency.

Due to the COVID-19 pandemic, many households have been affected and are at risk of becoming homeless. Furthermore, AB-2179 extended eviction protections through the end of June 2022 for those who had applied for the California COVID-19 Rent Relief Program and were waiting for their applications to be processed by the program. In addition, to prevent the surge of foreclosures and homelessness, lenders have allowed mortgagors to enter into forbearance, a process by which a mortgagor temporarily pauses or reduces their mortgage payment due to financial struggles.

In nearby City of Victorville, the Wellness Center Campus will be the first of its kind in San Bernardino County. The project was award and commenced construction in the 2021-2022 program year and is anticipated to be completed in December 2022. The Campus is anticipated to play a critical role in helping homeless individuals stabilize and rebuild their lives. The Campus will allow the Wellness Center to serve several functions by providing a low-barrier emergency shelter, recuperative care facility, medical clinic, interim housing and wrap around supportive services such as case management, care coordination, job training/placement and housing navigation.

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

In support of the CoC efforts, the City's Strategic Plan provided for the use of general funds to support activities implemented by local nonprofit organizations that provided services to help prevent and eliminate homelessness, including families at risk of homelessness, veterans, victims of domestic violence and emancipated foster youth.

Additional efforts are underway at the regional level to shorten the time that individuals and families are experiencing homelessness and to prevent individuals and families who were recently homeless from becoming homeless again. The 2-1-1 regularly works with public service agencies to analyze the resources and funding being used to operate transitional housing programs and consider how these resources could be used more in alignment with the best practices (i.e., rapid re-housing and permanent housing) for ending homelessness. Many transitional housing providers are working to End Homelessness to evaluate strategies to lower

program threshold requirements and improve outcomes including shorter shelter stays and more rapid transitions to permanent housing. The County also encourages the importance of increasing the number of permanent supportive housing units within its jurisdiction and increase in rapid rehousing assistance which helps individuals and families quickly exit homelessness to permanent housing without any preconditions for obtaining assistance (such as employment, income, absence of criminal record, or sobriety). Because of COVID-19 and the rise is housing costs and interest rates, the efforts of the State, County and City will need to be of the upmost importance to help prevent the rise in homelessness.

CR-30 - Public Housing 91.220(h); 91.320(j)

Actions taken to address the needs of public housing

The City of Hesperia Housing Authority (HHA) was formed on April 5, 2011, under the State of California Housing Authority Law to actively improve existing neighborhoods and develop affordable housing opportunities using local, state, and federal resources. The HHA does not administer Section 8 and does not own HUD Public Housing; however, the City is within the service area of the HACSB for the purposes of Section 8 and Public Housing. The HACSB manages a total of 10,508 rental assistance program units (privately owned with rent subsidies paid directly to owners by the Housing Authority), 99 units of public housing (units owned and managed by the Housing Authority) and 2,135 housing authority-owned units (units owned by the Housing Authority or acquired through developments) through its offices in Barstow, Chino, Colton, Redlands, San Bernardino, Victorville and Upland (2020 HACSB Annual Report, remains the most current available report).

To enhance the quality of HUD Public Housing units, HACSB continued to work towards converting existing HUD Public Housing units under HACSB's management and control to Section 8 units as part of HUD's Rental Assistance Demonstration (RAD) program. By the end of 2019, HACSB had converted its entire original portfolio of public housing under RAD, with the 98-unit Los Olivos development in Upland finalizing its conversion in May 2022 (FY 2023 Moving to Work Annual Plan, HACSB)

HACSB continues to maintain and expand the supply of affordable housing units in the City and throughout the County through its partnerships with the State of California and San Bernardino County Department of Community Development and Housing. As the largest provider of affordable housing in San Bernardino County, HACSB assists approximately 25,000 people, most of whom are seniors, individuals with disabilities, veterans, and children. More than 10,600 families are served through housing assistance payments made to landlords on behalf of the families. Other families reside in units owned and managed by HACSB. These programs provide a critical safety net for families in the County.

The City has partnered with builder DMB Development and investors Schlegel Capital and The Beaumont Group to oversee the massive Tapestry Housing project. The construction has commenced and is anticipated to create approximately 15,663 homes. The development is anticipated to take approximately two (2) decades to complete and will increase the City's population by nearly half. Although home sizes have not yet been discussed, the focus will be for affordable residences as prices for the project's first homes will range between \$300,000 and \$500,000, with several options for 55-plus seniors (The Sun).

In late 2021, the San Bernardino County and Related California executives celebrated the grand opening of the third phase of the Bloomington Affordable Housing Community located on 5 acres and containing 98 new affordable housing units. The development will also include a new 8,500-square foot public park and community center that will provide facilities and services for the future public park that will be located to the north of the development, slated for completion in 2022. The development is an integral piece to the overall countywide neighborhood revitalization spearheaded by the San Bernardino County Board of Supervisors (County Wire, December 2021).

In the fall of 2017, HACSB celebrated the grand opening of the Olive Meadow Affordable Housing Community, consisting of 62 high-quality affordable homes representing the first phase of the Arrowhead Grove Housing Community Revitalization Project (formerly the Waterman Gardens Affordable Housing Community Project). Construction on Crestview Terrace, the second on site phase of the Arrowhead Grove mixed-income housing development, was completed in August 2021 with the project officially opening in January 2022. The Arrowhead Grove Housing Community Revitalization Project was awarded \$20 million in Affordable Housing and Sustainable Communities (AHSC) program funds, \$55 million in tax-exempt bond allocations and \$22.5 million in low-income tax credits. The newest construction provided 184 mixed-income family apartments comprised of 147 affordable one-to four-bedroom family units, 35 market-rate units and 2 units for property managers, *FY 2023 Moving to Work Annual Plan, HACSB*).

Fully leased in 2020, Golden Apartments in Victorville is the first permanent supportive housing development to house and serve homeless individuals. The project converted a dilapidated property consisting of 21 two-bedroom units into a fully renovated apartment complex consisting of 38 one-bedroom flats with amenities including a community room, counseling meeting spaces for on-site social services, laundry facilities and outdoor patio for the chronically homeless (HACSB 2020 Annual Report). Similarly, the 61 rooms at Desert Haven were converted to a 31-unit single or double occupancy apartment complex for the chronically homeless. Both developments utilized the Housing First approach to help residents become self-sufficient, (HACSB 2018 & 2019 Annual Report). Combined, these developments provided 69 units of housing for homeless individuals, (HACSB 2020 Annual Report).

HACSB made formal commitments to assist AMCAL Multi-Housing Inc., with project-based vouchers to support the construction of affordable family units in Colton, Las Terrazas. Las Terrazas Apartments is an affordable multi-family apartment complex currently in development in unincorporated San Bernardino. The family community of 112 units will range in size from 525 to 1,020 net livable feet. The building mix will consist of five residential building, one community

building and one childcare building, all constructed on one six-acre site. The development is anticipated to be completed in 2022.

HACSB and affiliate nonprofit Housing Partners I, Inc. continue to work with ONXY Architects to complete construction documents by early 2020 to implement the 104-unit second phase of affordable family units at Valencia Grove site in Redlands. The groundbreaking of Phase II of the project is expected to occur in 2022, FY 2023 Moving to Work Annual Plan, HACSB).

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

HACSB encourages residents to be actively involved in the community and in the management of public housing developments through resident councils and numerous opportunities for feedback such as community meetings and surveys. HACSB and the City also actively encourage and promote public housing residents to explore homeownership opportunities and programs through HACSB's Homeownership Assistance Program (HAP) targeted at current residents. The Homeownership program utilizes a variety of methods to aid participants on their path to homeownership, including Section 32 (converted public housing), Section 8 Homeownership, and a Community Land Trust. HACSB also encourages and supports residents in participating in homebuyer counseling programs and recommends residents use the family self-sufficiency escrow account to save money towards homeownership. Under the Family Self-Sufficiency (FSS) Program, participants develop a five-year training and service plan that outlines the steps to become employed, increase their earnings, and become independent of government assistance. Upon graduation of the FSS Program, graduates are allowed to use the escrow account funds towards homeownership (HACSB 2018 Annual Report).

Under the Housing Authority's HAP program, families are provided mortgage assistance for up to 15 years for working families and up to 30 years for disabled families. A total of 251 families have become homeowners through the program since 2000 (HACSB 2020 Annual Report).

The City utilized leveraged dollars through Calhome and State HOME funds to administer a First-Time Homebuyer Down Payment Assistance Program (DAP) which assisted eligible low-and moderate-income households by providing a portion of the eligible purchaser's total down payment. In addition, the City provided several resources on services for foreclosure prevention and counseling.

Actions taken to provide assistance to troubled PHAs

Not applicable. HACSB is considered a High Performing PHA.

Discussion

HACSB is well-positioned to maintain and expand the supply of affordable housing units in the City and throughout the County through its partnerships with the State of California, San Bernardino County Department of Community Development and Housing, the City of Hesperia, and other cities throughout the county.

CR-35 - Other Actions 91.220(j)-(k); 91.320(i)-(j)

Actions taken 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. 91.220 (j); 91.320 (i)

In the development of the 2013-2021 Housing Element, the City evaluated significant public policies affecting affordable housing development such as land use controls, tax policies affecting land, zoning ordinances, building codes, fees and charges and growth limitations. Based on this evaluation, the City determined that it has taken all necessary steps to ameliorate the negative effects of public policies that may have been a barrier to affordable housing. An update to the Housing Element (2021-2029) further reports that the City has recently completed several affordable housing projects and is in the planning/approval stages for several additional affordable housing projects, indicating that the City's existing development standards do not constrain affordable housing development. Examples of changes made or to be made include but were not limited to:

- Single-Room Occupancy (SRO) The City recently amended its Zoning Ordinance to conditionally permit SRO housing in the residential zones of the Main Street and Freeway Corridor Specific Plan area.
- Farmworker Housing The City plans to amend the Zoning Ordinance within one year of the adoption of the City's Housing Element to address the Employee Housing Act with regard to farmworker housing. In addition, the City plans to amend the Zoning Ordinance to permit by right farm labor housing for 36 persons in a group quarter or 12 units intended for families on properties where agricultural uses are permitted.
- Housing for Persons with Disabilities The City plans to create a process within one year of the adoption of the Housing Element for making requests for reasonable accommodation to land use and zoning decisions and procedures regulating the siting, funding, development and use of housing for people with disabilities.

To address housing affordability and the lack of monetary resources for affordable housing, the City allocated funds for fair housing services to ensure fair housing choices are addressed throughout the combined five-year Consolidated Plan cycle.

Lastly, the City's updated 2021-2029 Housing Element notes the following to help ameliorate negative effects of public policies that serve as barriers to affordable housing:

- The City has outlined certain concessions for development standards in its Landscape Ordinance. Affordable housing developments are permitted to use one-gallon shrubs and five-gallon trees, instead of the otherwise required five-gallon shrubs and 15-gallon trees.
- The City has established a density bonus program to encourage the production of housing for lower and moderate-income households by offering developers density increases beyond the maximum allowed under the applicable zoning district and land use element of the general plan in exchange for the construction of below-market rate units. In addition, other development incentives may be permitted.
- Current state law requires jurisdictions to provide density bonuses and development incentives to all developers who propose to construct affordable housing on a sliding scale, where the amount of density bonus and number of incentives vary according to the amount of affordable housing units provided. In May of 2011, the City's Development Code was updated to reflect these new requirements.
- Under AB 1763, housing projects where all units are affordable to low and very low-income residents qualify for an 80% density bonus, except that up to 20 percent of the total units in the development may be for moderate-income households. AB 1763 provides for a fourth incentive and concession to 100% affordable projects. For housing projects that qualify as a special needs or supportive housing development, AB 1763 eliminates all local parking requirements. A development that is a special needs housing development shall have either paratransit service or unobstructed access, within one-half mile, to fixed bus route service that operates at least eight times per day.
- In October 2019, SB 13, AB 68, and AB 881 were adopted into in law with the intention
 of facilitating the construction of Accessory Dwelling Units (ADUs) in California. One key
 component of the new ADU laws is that the City is now required to allow Junior
 Accessory Dwelling Units (Junior ADUs). In June 2020, the development code was
 amended to be consistent with state law.
- AB 671 requires cities to include a plan that incentivizes and promotes the creation of ADUs that can be offered at affordable rent for very low, low-, or moderate-income households in its housing element. California Department of Housing and Community Development (HCD) is also to develop a list of existing state grants and financial incentives for operating, administrative, and other expenses in connection with the planning, construction, and operation of ADUs with affordable rent. The list must be posted on the HCD website by December 31, 2020. The development code will be

amended within one year following certification of the Housing Element to address the requirements of AB 671.

Actions taken to address obstacles to meeting underserved needs. 91.220(k); 91.320(j)

The primary obstacles to meeting the underserved needs of low- and moderate-income people include lack of funding from federal, state and other local sources, the high cost of housing that is not affordable to low-income people and the lack of availability of home improvement financing in the private lending industry. To address these obstacles, the City invested CDBG funds through the 2021-2022 Action Plan and leveraged funds in projects that provide public and neighborhood services to low- and moderate-income people and those with special needs, and programs that prevent homelessness. To address underserved needs, the City allocated 100 percent of its non-administrative CDBG percent of its investments for program year 2021-2022 to projects and activities that benefit low- and moderate-income people.

Actions taken to reduce lead-based paint hazards. 91.220(k); 91.320(j)

The Residential Lead Based Paint Hazard Reduction Act of 1992 (Title X) emphasizes prevention of childhood lead poisoning through housing-based approaches. This strategy requires the City to implement programs that protect children living in older housing from lead hazards.

Overall, the City has a relatively young housing stock, with 17,715 housing units out of a total of 26,255 of the City's total housing units, 67.5%, built after 1980 according to 2011-2015 ACS data. The remaining 32.5% constructed before 1980 have the most potential risk to contain lead-based paint. In these units, the best way to have reasonable assurance that lead-based paint hazards are not present is to have the painted surfaces tested.

According to the City, a typical lead-based paint screening survey costs approximately \$1,650. To reduce lead-based paint hazards, the City takes the following actions:

- Include lead testing and abatement procedures, if necessary, in all residential rehabilitation activities for units built prior to January 1, 1978.
- Monitor the lead-poisoning data maintained by the San Bernardino County Department
 of Public Health (SBDPH). According to SBDPH, there were four (4) incidents of Hesperia
 children with blood lead levels greater than 9.5 micrograms per deciliter, and a total of
 five (5) documented cases with levels equal to or greater than 20 micrograms per
 deciliter from 2009-2013 (more current data, not available).
- Educate residents on the health hazards of lead-based paint through brochures and encourage screening children for elevated blood-lead levels.

• Disseminate brochures about lead hazards through organizations such as Inland Fair Housing and Mediation Board (IFHMB).

Actions taken to reduce the number of poverty-level families. 91.220(k); 91.320(j)

The implementation of CDBG activities meeting the goals established during the 2021-2022 program year helped to reduce the number of poverty-level families by:

- Supporting activities that preserve and improve public facilities and infrastructure to benefit low-and moderate-income residents;
- Supporting activities that fulfill the HUD regulatory mandate to affirmatively further fair housing choice through the provision of fair housing education, counseling, antidiscrimination, and landlord-tenant mediation; and

In addition to these local efforts, mainstream state and federal resources also contribute to reducing the number of individuals and families in poverty. Federal programs such as the Earned Income Tax Credit and Head Start help provide a pathway out of poverty for families who are ready to pursue employment and educational opportunities. Additionally, in California, the primary programs that assist families in poverty are CalWORKs, CalFresh (formerly food stamps) and Medi-Cal. Together, these programs provided individuals and families with employment assistance, subsidy for food, medical care, childcare and cash payments to meet basic needs such as housing, nutrition, and transportation. Other services are available to assist persons suffering from substance abuse, domestic violence, and mental illness.

Actions taken to develop institutional structure. 91.220(k); 91.320(j)

The institutional delivery system in the City is high-functioning and collaborative—particularly the relationship between local government and the nonprofit sector comprised of a network of capable non-profit organizations that are delivering a full range of services to residents. Strong City departments anchor the administration of HUD grant programs and the housing and community activities that are implemented in the City. These are supported and enhanced through the City's collaboration with nonprofit agencies receiving CAP (leveraged City funds) funds by ensuring that the needs of low- and moderate-income residents are met. The institutional delivery system is successfully being implemented as envisioned within the 2020-2024 Consolidated Plan and Strategic Plan.

Actions taken to enhance coordination between public and private housing and social service agencies. 91.220(k); 91.320(j)

To enhance coordination between public and private housing and social service agencies, the City will continue consulting with and inviting the participation of a wide variety of agencies and organizations involved in the delivery of housing and supportive services to low- and moderate-income residents in the City—particularly the CDBG Target Areas. The City has also developed its CAP program which utilizes City leveraged dollars to fund non-profits through less administratively restrictive funds to ensure its residents are provided the services they require and deserve.

Identify actions taken to overcome the effects of any impediments identified in the jurisdiction's analysis of impediments to fair housing choice. 91.520(a)

The 2020 Analysis of Impediments to Fair Housing Choice (AI) adopted by the City Council on April 21, 2020, included two (2) impediments that remained unresolved from the 2015-2019 AI and one (1) impediment to fair housing choice. Although great strides have been made to try to address the impediments in prior years, the rise in the housing market and effects from the COVID-19 pandemic have made it challenging, especially with the closures and social distancing requirements in place. The City's Economic Development Department worked directly with its fair housing service provider, Inland Fair Housing and Mediation Board (IFHMB), during the 2021-2022 program year to ensure efforts where not stalled by conducting workshops and trainings virtually through Zoom, Microsoft TEAMs, and other platforms to ensure the information was accessible to both tenants and landlords. The City advertised and promoted events providing fair housing services on the City's Webpage Events Calendar as well as make Fair Housing brochures readily accessibility at City Hall. Through its virtual fair housing workshops, IFHMB has been able to successfully educate tenants and landlords of their rights and responsibilities.

The City has updated its Housing Element (2021-2029); however, the document reports that the City currently has no established process in place and reasonable accommodations are granted on a case-by-case basis. The City plans to amend the Development Code to implement a reasonable accommodation procedure to address reasonable accommodation requests relating to zoning and land use regulations. As there is no established procedure in place, no specific permits or fees are required for reasonable accommodation requests as of the date of this document.

CR-40 - Monitoring 91.220 and 91.230

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

During the 2021-2022 program year, the City has limited the number of activities it has funded to mostly City ran activities and fair housing services to streamline the City's CDBG program and ensure that CDBG funds are used efficiently and in compliance with applicable regulations. The City's Economic Development Department provides technical assistance to its fair housing service provider as well as other City departments at the beginning of the program year and monitors all activities throughout the program year to ensure benchmarks are met for continued compliance.

Technical Assistance

To enhance compliance with federal program regulations, the City's application paperwork provides detailed information regarding the City's five-year Consolidated Plan goals, program requirements and available resources for award. Prior to the approval of the Annual Action Plan, Subrecipient Agreements and Memorandums of Understandings (MOUs) are reviewed in detail with all parties to ensure overall activity compliance and to review the City's compliance procedures and requirements. Additionally, individualized technical assistance is provided on an as-needed basis throughout the program year.

Activity Monitoring

All activities are monitored, beginning with a detailed review upon receipt of an application to determine eligibility, conformance with a National Objective and conformance with a Strategic Plan goal. This review also examines the proposed use of funds, eligibility of the service area, eligibility of the intended beneficiaries and likelihood of compliance with other federal requirements such as the National Environmental Policy Act, the System for Award Management (SAM) debarment list, Davis-Bacon and Related Acts (prevailing wage), Minority and Women Business Enterprise, Section 3 and federal acquisition and relocation regulations, as applicable.

Eligible Subrecipients submit their most recent Financial Statement/Single Audit and other documentation to establish their administrative and financial capacity, and any findings noted in the audit are reviewed. In such instances where Audit findings arise, the agency is required to provide the City documentation resolving the finding. Prior to entering into a written agreement, staff and consultants perform periodic desk monitoring including ongoing review of required performance reports and documentation to substantiate CDBG expenditures. The

reviews also include both a fiscal and programmatic review of the subrecipient's activity(ies). The reviews determine if the activity(ies) comply with the program regulations and City contract and/or MOU. Areas of review included overall administration, financial systems, appropriateness of program expenditures, program delivery, client eligibility determination and documentation, reporting systems, and achievement toward achieving contractual goals. No deficiencies or non-compliance with the program requirements were identified during the 2021-2022 program year.

For CDBG capital projects, monitoring of Davis-Bacon and Related Acts, Minority and Women's Business Enterprise (MBE/WBE) and Section 3 requirements were conducted by LDM Associates, Inc. to determine the adequacy of implementation by the Development Services Department and its consultants.

Citizen Participation Plan 91.105(d); 91.115(d)

Describe the efforts to provide citizens with reasonable notice and an opportunity to comment on performance reports.

In accordance with the City's adopted Citizen Participation Plan (CPP), a public notice was published in the Hesperia Resorter in English and in Spanish on September 1, 2022, notifying the public of the availability of the CAPER for a 15-day public review and comment period. Copies of the public notices are included in **Appendix A**.

The draft CAPER was available on the City's website and at the following locations:

City Clerk's Office

9700 Seventh Avenue Hesperia, California 92345

Economic Development Department

9700 Seventh Avenue Hesperia, California 92345

Hesperia Public Library

9560 Seventh Avenue Hesperia, California 92345

A public hearing was conducted before the City Council on Tuesday, September 20, 2022, to solicit comments from residents and interested parties. A summary of all written or oral comments received during the public hearing are included in **Appendix B**.

CR-45 - CDBG 91.520(c)

Specify the nature of, and reasons for, any changes in the jurisdiction's program objectives and indications of how the jurisdiction would change its programs as a result of its experiences.

CDBG funds are making a significant impact on strategies to address the high priority needs identified in the 2020-2024 Consolidated Plan – Strategic Plan. As shown in **Figure 1** in section CR-05 of this document, CDBG funds contributed to three (3) Strategic Plan goals (includes Administration goal) reported in Table 1 of this document.

Public Facility and Infrastructure Improvements

To improve City public facilities and infrastructure to benefit low- and moderate-income people or those presumed under HUD regulations to be low- and moderate-income such as elderly people and disabled adults as well as residents of low- and moderate-income housing, the City invested CDBG resources to address this Strategic Plan goal through the funding of the 2020-2021 and 2021-2022 Street Improvement Projects (two separate projects) and the Peach Avenue Drainage Improvement Project. During the 2021-2022 program year, the City was able to complete the 2020-2021 Street Improvement Project and commence procurement efforts for design and engineering services for the 2021-2022 Street Improvement Project, which is anticipated to be awarded during the 2022-2023 program year. In addition, the City was able to commence construction on the Peach Avenue Drainage Improvement Project, which is anticipated to be completed during the 2022-2023 program year.

Fair Housing Services

For the implementation of the City's Fair Housing Services, the City funded IFHMB in the amount of \$15,000. The funds were used for the provision of fair housing outreach, education, and enforcement activities, including landlord-tenant matters. During the program year, IFHMB was able to provide fair housing services to 63 unduplicated residents and landlord tenant mediation services to 341 unduplicated residents.

Public Services for Low-income Residents/Senior Services/Homeless Prevention and Special Needs Services (not a Strategic Plan Goal, but efforts supported by City leverage dollars)

To support the City's initiative for Public Services for Low-income residents, leveraged City funds were awarded to 11 agencies that provided different public services for the residents of the City. Such services ranged from food banks/pantries, senior/disabled adult services, shelter and shelter services, veteran services, and other various public services. In total, the agencies provided public service assistance to 11,530 primarily low- and moderate-income residents.



APPENDIX A
Public Notices



(Will be entered prior to submission to HUD)

APPENDIX B Summary of Citizen Participation Comments



APPENDIX C IDIS Reports



APPENDIX D SPEARS – HUD 60002