

FY 2020-2021

Consolidated Annual Performance Evaluation Report (CAPER)



***3rd Year of the 2018-2023
Five-Year Consolidated Plan***

**Approved Report
September 28, 2021**

CR-05 - Goals and Outcomes

Progress the jurisdiction has made in carrying out its strategic plan and its action plan.

91.520(a)

This could be an overview that includes major initiatives and highlights that were proposed and executed throughout the program year.

Each year, the City of Glendora (City) receives Community Development Block Grant Program (CDBG) Entitlement funds from United States Department of Housing and Urban Development (HUD). In addition, on March 27, 2020, the Coronavirus Aid, Relief, and Economic Security (CARES) Act was signed into law providing additional CDBG funds (CDBG-CV) to prevent, prepare for, and respond to the coronavirus pandemic (pandemic). The City's initial allocation was \$179,204 (CV1). The City also received a second allocation of \$266,983 (CV3) for a total of \$446,187. The CDBG-CV funds were initially allocated in the FY 2019-2020 Annual Action Plan, but activities using those funds were developed in both FY 2019-2020 and FY 2020-2021.

All CDBG funds, whether Entitlement or CDBG-CV, must serve the residents of the community in one of the three areas below:

- Benefitting low- and moderate-income persons;
- Eliminating slum and blight;
- Meeting a particularly urgent community need.

This CAPER reviews the City's specific achievements using CDBG Entitlement funds over the last program year (July 1, 2020 through June 30, 2021) and reviews the City achievements using CDBG-CV funds in both FY 2019-2020 and FY 2020-2021. It assesses the City's progress to date in implementing the goals and objectives of the five-year 2018-2023 Consolidated Plan.

Specifically, the City of Glendora has developed the objectives, outcomes, and quantifiable goals below for each priority need category listed in the 2018-2023 Consolidated Plan.

- **Infrastructure and Public Facilities:** Improve and expand infrastructure and public facilities that benefit low and moderate income neighborhoods and residents. The Objective/Outcome categories will be A Suitable Living Environment/Availability/Accessibility (SL-1), with a goal of assisting 5 public facilities/infrastructure projects (1 annually).
- **Economic and Human Development:** Provide for the economic development needs of low and moderate income persons. The program will also create or retain jobs for low- and moderate-income residents. The Objective/Outcome categories will be Economic Opportunity/Availability/Accessibility (EO-1), with a goal of assisting three (3) businesses over five years.
- **Fair Housing:** Promote fair and equal housing choice for all persons, promote housing that is

accessible to and usable by persons with disabilities, and comply with the non-discrimination requirements of the various Fair Housing laws. The Objective/Outcome categories will be Decent Housing/Availability/Accessibility (DH-1). with a goal of assisting 250 low/mod persons (50 annually).

- **Administration and Planning:** Provide for administration and planning activities to develop housing and community development strategies and programs needed to carry out actions that address identified needs in the Consolidated Plan. The Objective/Outcome categories will be A Suitable Living Environment/Availability/Accessibility (SL-1), with a goal of successfully administering the CDBG program per HUD regulations.

The following are accomplishment achieved in FY 2020-2021, and cumulative over the first three years of the FY 2018-2023 Consolidated Plan.

CDBG Entitlement Funds

- **Infrastructure and Public Facilities:** Two projects were allocated FY 2020-2021 funds and are still in progress. Two prior year projects have been completed, benefitting 1,905 low and moderate income residents. A total of 3,790 low and moderate-income residents will benefit from the four projects.
- **Economic and Human Development:** No funds were allocated to this area in FY 2020-2021.
- **Fair Housing:** In FY 2020-2021, the City assisted 32 residents in this area. A total of 98 residents have been assisted to date.
- **Administration and Planning:** The City continued to effectively manage the CDBG program in FY 2020-2021.

CDBG-CV Funds

- **Economic and Human Development:** In FY 2019-2020, the City launched a Small Business Assistance Loan program using CDBG-CV funds specifically to assist businesses to prevent, prepare for, and respond to coronavirus. In July 2020, one business was assisted in the amount of \$14,862. This program continued to operate in FY 2020-2021.
- **Fair Housing:** The City allocated CDBG-CV funds in this area in FY 2020-2021 to operate an Emergency Rental Assistance Program for tenants impacted by the coronavirus pandemic. In FY 2020-2021, 46 renters were assisted.
- **Administration and Planning:** The City continued to effectively manage the CDBG-CV program in FY 2020-2021.

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.

Goal	Category	Source / Amount	Indicator	Unit of Measure	Expected – Strategic Plan	Actual – Strategic Plan	Percent Complete	Expected – Program Year	Actual – Program Year	Percent Complete
Economic and Human Development	Non-Housing Community Development	CDBG-CV: \$44,462	Facade treatment/business building rehabilitation	Business	3	1	0.33%	3	1	0.33%
Fair Housing	Fair Housing	CDBG-CV: \$312,088	Public service activities other than Low/Moderate Income Housing Benefit	Persons Assisted	52	46	88.46%	52	46	88.46%
Fair Housing	Fair Housing	CDBG: \$15,000	Other	Other	250	98	39.20%	50	32	64%
Infrastructure and Public Facilities	Non-Housing Community Development	CDBG: \$325,000	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit	Persons Assisted	5	2	40.00%	2	0	0.00%

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

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.

Only eligible activities that received a High Priority level are funded during each of the five years of the 2019-2023 Consolidated Plan. In year one, \$279,938 in CDBG funds plus \$44,128.84 of program income was expended to implement the Consolidated Plan. In year two, \$290,016 in CDBG funds plus \$80,748 of prior year funds was expended to implement the Consolidated Plan. For FY 2020-2021 (the third year of the Consolidated Plan), the City of Glendora used its allocation of \$304,584 in CDBG funds plus \$65,922 of prior year carryover reallocated by Substantial Amendment to address the highest priorities identified in the FY 2018-2023 Consolidated Plan. The CDBG-CV funds were allocated to various programs through a Substantial Amendment to the 2019-2020 Annual Action Plan, adopted May 26, 2020.

In FY 2020-2021, the City of Glendora addressed all of the Consolidated Plan Priorities listed above by providing CDBG funding as follows:

CDBG Entitlement Funding

1. Infrastructure and Public Facilities:

The City allocated \$325,000 in FY 2020-2021 to two street improvement projects:

- Dawson, Pennsylvania, and Washington Avenues
\$220,000 will be used to rehabilitate the badly deteriorated pavement as well as the curb, gutter and sidewalk on Dawson Ave. West of Glendora Ave through Pennsylvania, and Pennsylvania and Washington Avenues. \$212.50 has been expended. The project is located in low- and moderate-income area of Census Tract 4039.02 Block Group 1 with 2,015 residents of which 1,035 (51%) are considered low- and moderate-income.
- Mountain View Avenue with Alley
\$105,000 will be used to rehabilitate the badly deteriorated pavement as well as the curb, gutter and sidewalk on Mountain View Ave. from Vermont Ave. on the East to Pennsylvania Ave. on the West as well as the corresponding alley on the South. \$212.50 has been expended. The project is located in low- and moderate-income area of Census Tract 4010.02 Block Group 3 with 1,550 residents of which 850 (54.84%) are considered low- and moderate-income.

Both projects are still in the planning stages and are expected to be completed in FY 2021-2022. See the maps of the two FY 2020-2021 projects below.

2. Economic and Human Development:

In FY 2020-2021, no CDBG Entitlement funds were allocated to Economic and Human Development, however significant CDBG-CV funds were allocated in this area (see below.)

3. Fair Housing:

The City allocated \$15,000 to the Housing Rights Center in FY 2020-2021. A total of \$15,000 was expended and 32 persons were provided fair housing and landlord/tenant services, meeting 64 percent of the annual goal. In FY 2019-2020, the \$15,000 allocated was fully expended and 28 persons were assisted, meeting 56% of the annual goal.

4. Administration and Planning:

In FY 2020-2021, the City allocated \$30,506.00 for general planning and administration, of which \$4,979.45 was expended. In FY 2019-2020, the City allocated \$43,003 and expended \$6,405.75 for general planning and administration.

CDBG-CV Funding

1. Infrastructure and Public Facilities:

No CDBG-CV funds were allocated to Infrastructure and Public Facilities in either FY 2019-2020 or FY 2020-2021.

2. Economic and Human Development:

In FY 2019-2020, the City allocated \$143,364 in CDBG-CV funds for a Small Business Assistance Loan Program for businesses impacted by the pandemic. However, due to lack of demand, that amount was reduced to \$44,862. In July 2020, one business was assisted in the amount of \$14,862. This program continued to operate in FY 2020-2021.

3. Fair Housing:

In FY 2020-2021, The City allocated \$312,088 in CDBG-CV funds for an Emergency Rental Assistance Program. \$256,820.46 has been expended, assisting 46 renters impacted by the pandemic. This represents 88.46 percent of the goal of 52.

4. Administration and Planning:

In FY 2019-2020, the City allocated \$89,237 for CDBG-CV general planning and administration. Those funds continued to be used into FY 2020-2021. A total of \$28,168.26 has been expended.

Figures 1-5 below illustrate the geographic locations of the Street projects as related to the low and moderate-income target areas.

Figure 1 – Street Improvement Project (Dawson, Pennsylvania and Washington Avenues).

**FY 2020-2021 CDBG Eligible Areas and Street Resurfacing Project
Census Tract 4039.02**

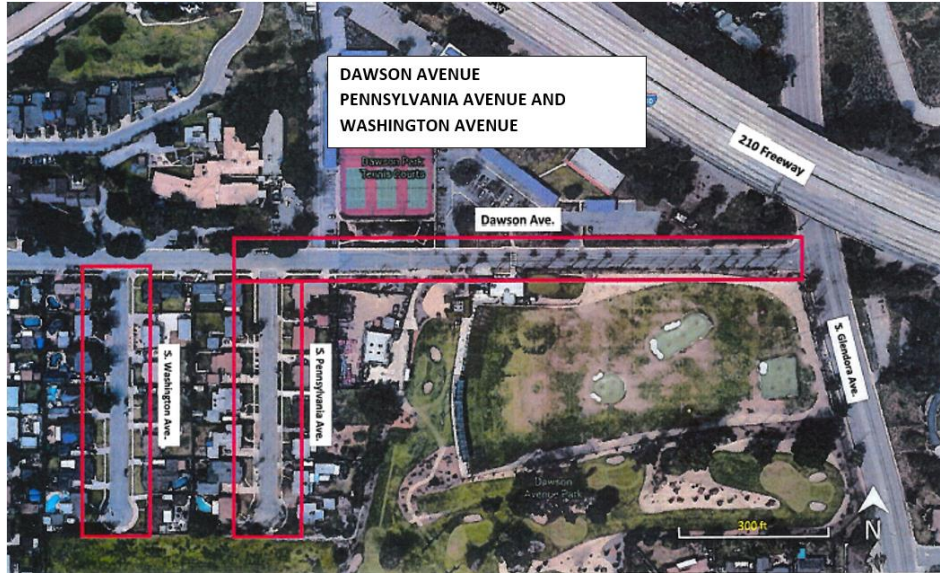


Figure 2 – Street Improvement Project (Mountain View Avenue with Alley)

**FY 2020-2021 CDBG Eligible Areas and Street Resurfacing Project
Census Tract 4010.02**

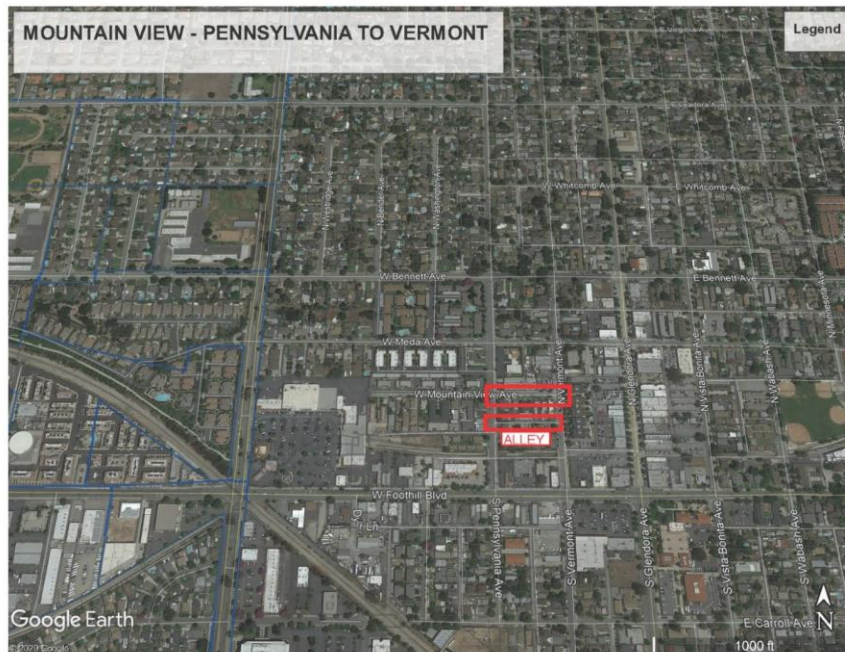


Figure 3 - Street Improvement Project (North of Colorado Avenue: Cullen Avenue, Marion Place, Scott Place)

FY 2019-2020 CDBG Eligible Areas and
Street Resurfacing Project
Census Tract 4011.01

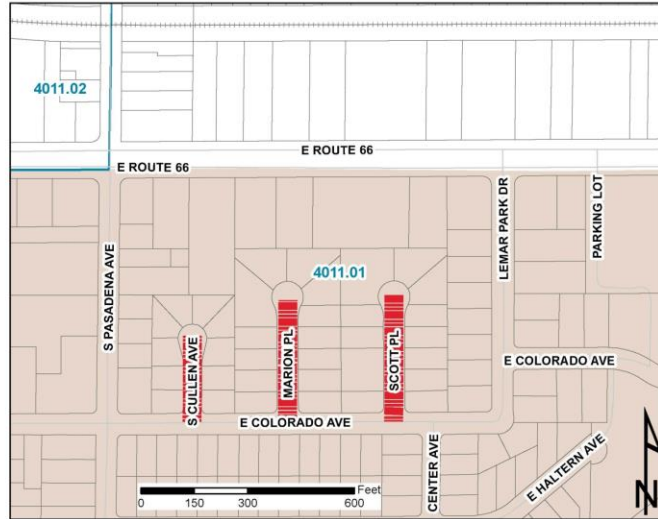


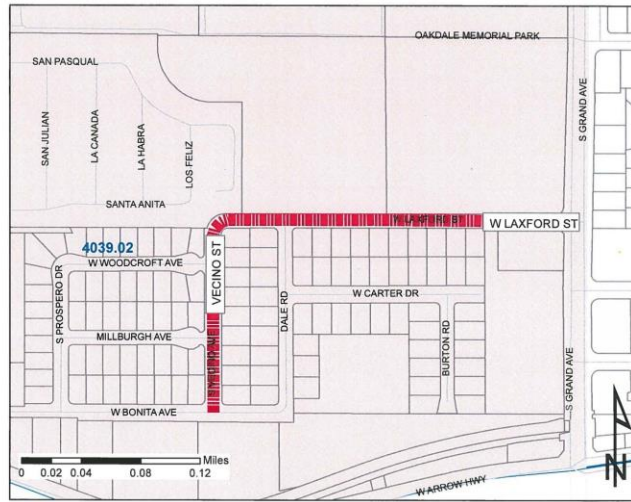
Figure 4 - Street Improvement Project (Bonita Avenue and Dale Road)

FY 2019-2020 CDBG Eligible Areas and
Street Resurfacing Project
Census Tract 4039.02



Figure 5 - Street Improvement Project (Laxford Street and Vecino Street)

FY 2018-2019 CDBG Eligible Areas and
Street Resurfacing Project



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)

	CDBG
White	46
Black or African American	6
Asian	2
American Indian or American Native	0
Native Hawaiian or Other Pacific Islander	0
Total	54
Hispanic	25
Not Hispanic	21

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

Narrative

Table 2 above includes the racial and ethnic composition of persons assisted in the CDBG-CV funded Emergency Rental Assistance Program and the CDBG-funded Fair Housing Program. A total of 71 persons were assisted, but 25 of the 74 identified as a race not provided for in Table 2. Of the 71 served, 25 identified themselves as Hispanic, and 46 as not Hispanic. This sample is too small to reliably compare to the race and ethnicity of the City's overall population, and therefore no statistic regarding the City's overall race and ethnicity are included.

CR-15 - Resources and Investments 91.520(a)

Identify the resources made available

Source of Funds	Source	Resources Made Available	Amount Expended During Program Year
CDBG	public - federal	\$370,506	\$20,404.45
CDBG-CV	public - federal	446,187	\$299,850.72

Table 3 - Resources Made Available

Narrative

For FY 2020-2021, the City had available \$304,584 in CDBG entitlement allocation and \$65,922 in prior years unspent funds, for a total available funds of \$370,506. In addition, the City received two allocations of CARES Act funds totaling 446,187 which were allocated for the Business Assistance Program, an Emergency Rental Assistance Program, and Administration to address needs related to the Coronavirus. The amount expended for CDBG-CV in Table 3 reflects all expenditures in FY 2019-2020 and FY 2020-2021.

Based on the limited amount of resources available to the City, statutory restrictions, and the Priority Needs determined to have a high priority level, the FY 2020-2021 CDBG One-Year Annual Action Plan included the following projects:

Activity/Amount

- General CDBG Administration: \$30,506.00 allocated/\$4,975.45 expended
- Fair Housing: \$15,000 allocated/\$15,000 expended
- Street Improvement Projects (2): \$325,000 allocated/\$425.00 expended
- CDBG-CV Administration: \$89,237 allocated/\$28,168.26
- CDBG-CV Emergency Rental Assistance: \$312,088 allocated/\$256,820.46 expended
- CDBG-CV Administration \$35,840/\$0 expended
- CDBG-CV Small Business Assistance Loan Program \$44,682 allocated/\$14,862.00 expended

Identify the geographic distribution and location of investments

Target Area	Planned Percentage of Allocation	Actual Percentage of Allocation	Narrative Description
CDBG Low-Mod Income Target Areas	89%	89%	low- and moderate-income area (LMA) census tracts and block groups

Table 4 – Identify the geographic distribution and location of investments

Narrative

Table 4 illustrates the geographic distribution of funding, which is based on the nature of the activity to be funded and occurred. CDBG Administration and Fair Housing Services were provided citywide to all residents. The two Street Improvement Projects, which is administered by the Public Works Department, took place on residential streets of the low- and moderate-income area of Census Tract as show below:

- Project #1 (Dawson, Pennsylvania, and Washington Avenues) took place in Census Tract 4039.02, Block Group 1. This Block Group benefitted by this project has 2,015 residents, of which 1,035 (51.36%) are considered low- and moderate-income.
- Project #2 (Mountain View Avenue with Alley) took place in Census Tract 4010.02, Block Group 3. This Block Group benefitted by this project has 1,550 residents, of which 850 (54.84%) are considered low- and moderate-income.

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.

The City of Glendora has not identified any publicly owned land for housing and community development activities.

Federal funds will leverage additional resources as grant opportunities become available. In FY 2020-2021, no funds were leveraged; however, the City does benefit from County funding for rental assistance provided by HUD through the Housing Choice Voucher program.

The City does not receive HOME funds, so there are no matching requirements.

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.

	One-Year Goal	Actual
Number of Homeless households to be provided affordable housing units	0	0
Number of Non-Homeless households to be provided affordable housing units	0	0
Number of Special-Needs households to be provided affordable housing units	0	0
Total	0	0

Table 5 – Number of Households

	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 through Rehab of Existing Units	0	0
Number of households supported through Acquisition of Existing Units	0	0
Total	0	0

Table 6 – Number of Households Supported

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

Given the limited funds available, the City does not utilize CDBG funds for affordable housing activities. During FY 2020-2021 the City addressed affordable housing needs through the following programs:

- Section 8 Rental Assistance (DH-2):** The City continued to work with the Los Angeles Community Development Authority which oversees the Housing Choice Voucher Program (Section 8 rental assistance) for extremely low- and low-income households. Overall, 35 low-income (0-50 percent AMI) renter-households were assisted, which included 15 elderly and 19 disabled special needs

households. These units met the Section 215 definition of affordable housing. Actual accomplishments in FY 2019-2020 resulted in 36 vouchers being issued by the Housing Authority, 35 of which assisted low-income renter-households (0-50 percent AMI). Specifically, 32 were extremely- low-income households, three (3) were low-income renter-households, and ONE (1) was a moderate-income renter-households.

- Fair Housing Program (DH-1):** The City’s Fair Housing Program is administered through a contract with the Housing Rights Center, which provides fair housing services and landlord/tenant information to all residents who request counseling, resource referral, complaint investigation, and public education on all forms of housing discrimination. Approximately 60 low-income (0-50 percent AMI) renter-households were to be assisted, which include elderly, single-parent, and disabled special needs households. Actual accomplishments in FY 2020-2021 resulted in 32 persons assisted with fair housing services by the Housing Rights Center. Among the assisted persons, 28 were extremely- low-income, three were low-income, and one was moderate-income. Among those assisted, nine were disabled and three were seniors.

Discuss how these outcomes will impact future annual action plans.

The City will continue to include these two housing programs in future annual action plans regardless of annual outcomes, as there are limited housing programs available to meet the Consolidated Plan goals.

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.

Number of Households Served	CDBG Actual	HOME Actual
Extremely Low-income	24	0
Low-income	22	0
Moderate-income	0	0
Total	46	0

Table 7 – Number of Households Served

Narrative Information

The information in Table 7 reflects those served through the CDBG-CV Emergency Rental Assistance Program. During FY 2020-2021 the City addressed affordable housing needs through the following programs:

- Section 8 Rental Assistance (DH-2):** Housing Choice Vouchers (Section 8 rental assistance) continued to be available to extremely low- and low-income Glendora households through the Los Angeles County Development Authority (LACDA). Overall, 35 low-income (0-50 percent AMI) renter-households were assisted, which included elderly, single-parent, and disabled special needs households.

- **Fair Housing Program (DH-1):** The City's Fair Housing Program is administered through a contract with the Housing Rights Center, which provides fair housing services and landlord/tenant information to all residents who request counseling, resource referral, complaint investigation, and public education on all forms of housing discrimination. Approximately 50 low-income (0-50 percent AMI) renter-households were to be assisted, which include elderly, single-parent, and disabled special needs households. Actual accomplishments in FY 2020-2021 resulted in 32 persons assisted with fair housing services by the Housing Rights Center. Among the assisted persons, 28 were extremely-low-income, three were low-income, and one was moderate-income (0-50 percent AMI). Among those assisted, seven were disabled and four were seniors.
- **Emergency Rental Assistance Program (DH-2):** The City used CDBG-CV funds to assist renters impacted by the pandemic. Of the 46 assisted, 24 were extremely low income and 22 were low income. Of those assisted, 26 were Female Headed Household and four were Senior Head of Household.

In addition, the City funded two affordable housing complexes in prior years that provide 52 affordable units (27 extremely low, 19 very low, and six low) through Heritage Oaks and 87 affordable units (13 extremely low, 55 very low and 19 low) through Elwood Family Apartments. These units will remain affordable throughout the Consolidated Plan period.

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

Due to the pandemic, the 2020 Point-in-Time Homeless Count conducted by the Los Angeles Homeless Services Authority (LAHSA), was limited to those homeless who were sheltered. Based on that count, there were 797 homeless households, comprised of 1,231 homeless individuals in Service Planning Area (SPA) 3, which includes (but is not limited to) the cities of Alhambra, Altadena, Arcadia, Azusa, Baldwin Park, Claremont, Covina, Diamond Bar, Duarte, El Monte, Glendora, Irwindale, Monrovia, Monterey Park, Pasadena, Pomona, San Dimas, San Gabriel, San Marino, Temple City, Walnut, West Covina. Information for Glendora alone is not available, but the small number of homeless overall in SPA 3 would indicate that the number of homeless in Glendora is relatively small as well. Given the City's limited CDBG resources and relatively small number of homeless in the City of Glendora, homeless activities were not given a priority in the 2018-2023 Consolidated Plan.

Despite limited resources, the City collaborates with a variety of different agencies to ensure homeless individuals are provided the best information and services available. City staff meet monthly with the LA County Department of Mental Health, LAHSA, Glendora Police Department MET team, Glendora Police Department CIT team, and Union Station Homeless Services to coordinate services for the most vulnerable mentally ill people that are homeless. City staff also meet monthly with staff from the other cities in SPA 3. The City regularly coordinates with local non-profits, including Glendora Ministerial association, Shepard's Pantry and Glendora Welfare. The City also operates the La Fetra Center, which is open 9am to 5pm daily and provides a location that the homeless may inquire about services in person.

The City used a portion of one of its Measure H funds to develop a community plan to respond to homelessness. The City hosted two community meetings and met with nearly a dozen service providers that are actively interacting with the homeless and Glendora residents, and have utilized their feedback to assist in the completion of this plan. The plan was approved by City Council on June 12, 2018 and includes actions the City will undertake to implement, enhance, and share resources to better address the concerns surrounding homelessness.

Addressing the emergency shelter and transitional housing needs of homeless persons

There is no shelter or transitional housing located in the City of Glendora. The City received two Measure H grants from Los Angeles County and uses them for programs that coordinate services with other nearby cities. Case managers and homeless navigators work with the homeless to determine their greatest needs and coordinate to provide emergency housing vouchers when needed. The City received two grants totaling \$240,000 from the San Gabriel Valley Council of Governments to provide emergency housing and

homelessness prevention and diversion programs. In addition, during the pandemic, the City Council approved \$450,000 to pay for motels stays for the homeless from April 2020, to February, 2021.

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

Many of the programs noted above also provide services to those at-risk of becoming homeless. Case Management, emergency assistance with one-time expenses, and referrals to mental health services, legal services, and food services can prevent those at-risk of homelessness from losing their housing. The services provided are available to anyone needing them, including foster youth, seniors, and those exiting corrections institutions.

Helping homeless persons (especially chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth) make the transition to permanent housing and independent living, including shortening the period of time that individuals and families experience homelessness, facilitating access for homeless individuals and families to affordable housing units, and preventing individuals and families who were recently homeless from becoming homeless again

The collaborations noted above include services that assist in 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.

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

Actions taken to address the needs of public housing

No public housing is located in the City of Glendora; therefore, there were no actions taken to address the needs of public housing.

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

No public housing is located in the City of Glendora; therefore, there were no actions taken to encourage public housing residents to become more involved in management and participate in homeownership.

Actions taken to provide assistance to troubled PHAs

The Housing Authority of the County of Los Angeles (HACoLA) administers the Housing Choice Voucher program on behalf of the City of Glendora. HACoLA is identified as a High Performing Housing Authority according to the Agency's Action Plan; therefore, there were no actions taken to provide assistance to a troubled PHA.

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)

Market and governmental factors pose constraints to the provision of adequate and affordable housing. These factors tend to disproportionately impact lower- and moderate-income households due to their limited resources for absorbing the costs. Glendora works to remove barriers to affordable housing by implementing a Housing Element that is consistent with California law and taking actions to reduce costs or provide off-setting incentives to assist in the production of safe, high-quality, affordable housing. The City is committed to removing governmental constraints that hinder the production of housing, and offers a one-stop streamlined permitting process to facilitate efficient entitlement and building permit processing.

In 2013, the City updated its Housing Element update for the 2013-2021 planning period. The update did not identify significant governmental constraints to housing development. The City will continue to monitor its zoning and development regulations. The City will continue to implement the streamlined permit processing as required by State law. The City will continue to offer incentives to foster affordable housing development through State density bonus law and local incentives through the various specific plans.

The City will continue to foster affordable housing development in the community through incentives such as density bonuses for affordable housing, mixed use development, and lot consolidation. In addition, fair housing as a homeless prevention strategy can assist those facing unfair evictions and foreclosure frauds, and therefore be able to remain at their homes.

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

The City's underserved populations include the elderly, disabled, homeless and at-risk homeless families and individuals. The City will rely on its existing network of public and nonprofit service agencies, along with the City's Community Services Department, to provide an array of supportive services for the City's underserved groups. In addition, the City will use CDBG funds to support the fair housing program that targets many of the City's underserved residents. Fair housing is a homeless prevention strategy, allowing many equal access to housing and assisting those facing unfair treatment in the housing market. CDBG funds will also be used to fund ADA improvements at public facilities, benefitting persons with disabilities that are often underserved.

As previously mentioned, the City is collaborating with four other San Gabriel Valley cities to provide case management services to assist the homeless, using County of Los Angeles Measure H grants.

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

The City's ability to address LBP hazards and increase access to housing without LBP hazards is extremely limited. The City's Code Enforcement staff will continue to provide information of lead-based paint hazards and resources for abatement to residents. Such information is also available at public counters. While the City previously provided for lead-based paint hazard testing through rehabilitation programs, the rehabilitation programs are no longer offered.

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

With limited funding, the City plans to focus CDBG funds job creation/retention activities through the Small Business Assistance Loan program which targets businesses affected by the pandemic. The goal is to provide assistance that will allow businesses to survive through the pandemic.

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

With the loss of redevelopment funds and reduced CDBG funding, the City eliminated the Housing Division and consolidated the administration of CDBG program under the City's Planning Department. City staff had consulted with HUD staff and attended HUD trainings in order to better craft a CDBG program that can be delivered in a cost-effective manner. City staff will continue to communicate and work with HUD staff to implement the CDBG program and develop institutional structure. Also, as detailed in section CR-45 of this CAPER, the City makes significant efforts to stay connected to other government agencies and local non-profits to increase the effectiveness and efficiency of the various programs available.

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

The City will continue to coordinate with public and private housing and services agencies to deliver housing and community development activities in the community. Various agencies will continue to be invited to attend public meetings related to the CDBG program.

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

The City updated its Analysis of Impediments (AI) to Fair Housing Choice in FY 2017-2018. The updated 2018 identifies the following impediments:

1. Increase outreach and education activities
2. Monitor real estate advertisements
3. Investigate housing discrimination claims and violations
4. Monitor lending practices

Actions taken to overcome effects of impediments identified included:

The City of Glendora continued to contract with the Housing Rights Center (HRC) to provide fair housing services for Glendora residents and housing providers. HRC assists in preventing/reducing housing discrimination, predatory lending, and hate crimes in Glendora.

The City previously contacted the San Gabriel Valley Examiner and the San Gabriel Valley Tribune informing them to add a disclaimer for rental housing stating “no pets allowed” may still be required to rent to disabled persons with qualified service or companion animals.

In November 2013, the City adopted an updated Housing Element for the 2013-2021 planning period. As part of that update, the City reviewed the removal of housing constraints and impediments. The 2013-2021 Housing Element identifies no governmental constraints to the housing development. The State of California Department of Housing and Community Development completed its review of the City of Glendora’s Housing Element on November 26, 2013 and certified the Element as being in substantial compliance with State law. The City adopted universal design guidelines for housing for disabled persons as part of the preparation of the 2008-2013 Housing Element update.

The City of Glendora adopted an ordinance that provides a reasonable accommodation procedure for disabled persons that removes physical barriers in public and private buildings. The procedure was prepared by the City Attorney’s Office and the City of Glendora Planning Department.

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

The City requires all subrecipients to execute an agreement with specific performance requirements prior to the release of funds. Progress reports of accomplishments must be submitted quarterly along with a year-end annual report. Subrecipients are also required to submit their annual financial audits, and all invoices submitted must include appropriate backup information to support the release of funds.

Prior to the pandemic, the City conducted an on-site monitoring review of each of the subrecipients to review all of this information to ensure compliance with federal, state, and local regulations. Due to the pandemic, in FY 2020-2021 the City conducted desk monitoring of each subrecipient. Copies of the findings of each monitoring visit are available in the subrecipient's CDBG Program file. As a result of the annual monitoring of each subrecipient, several agencies improved the quality of quarterly and annual reporting accomplishments and the City confirmed that all programs were in compliance with federal regulations.

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.

The Draft CAPER was available for the required 15-day public review from September 12, through September 27, 2021. A notice was posted on the City's website and published in the newspaper on September 9, 2021. The proof of publication can be found in Appendix A. The City Council reviewed the document at their regularly scheduled meeting on September 28, 2021. No public comments were received at the City Council meeting or during the 15-day comment period.

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.

As the development of the FY 2020-2021 Annual Action Plan was coming to a conclusion, the City and its residents began to feel the impacts of the coronavirus pandemic. The needs of the community changed dramatically and CDBG-CV funding to address the impacts of the pandemic became available from the federal government. In response to this, the City undertook a Substantial Amendment to the FY 2019-2020 Annual Action Plan. This Amendment initially allocated \$143,364 for business assistance to help businesses impacted by the pandemic. As the impacts of the pandemic unfolded, and other sources of funding for businesses became available, it became apparent that the CDBG-CV funds would be better used in an Emergency Rental Assistance Program. In FY 2020-2021, the allocation for the business assistance program was reduced and the remaining funds were allocated to the Emergency Rental Assistance Program.

Does this Jurisdiction have any open Brownfields Economic Development Initiative (BEDI) grants?

No

[BEDI grantees] Describe accomplishments and program outcomes during the last year.

Not applicable

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.

During the past few years the City has not had adequate staff and redevelopment funds as leverage to achieve its goals. Since FY 2012-13, the City has used the service of a consultant to assist with the administration of the CDBG Program.

The City recognized that \$25,000 may not be an adequate loan to attract participants to the Small Business Assistance Loan program. Therefore, the City rolled over allocations from prior years to combine with the FY 2018-2019 allocation, allowing for larger loans to qualified participants.

In FY 2018-2019, the City required one recipient of the Small Business Loan Program to repay their loan for noncompliance. However, the loan recipient later brought their file into compliance, resulting in the reimbursement for the loan repayment of \$29,128.84. However, there were no new participants for the Small Business Assistance Loan program in FY 2018-2019 or in FY 2019-2020.

During FY 2019-20, the City made a substantial amendment to reallocate unexpended carryover funds from the Business Assistance Program Funds and to incorporate CARES Act funds to address COVID-19.

The City pursued all resources identified in the Consolidated Plan and did not hinder plan implementation by action or willful inaction.

Does this Jurisdiction have any open Brownfields Economic Development Initiative (BEDI) grants?

No

[BEDI grantees] Describe accomplishments and program outcomes during the last year.

N/A