



City of  
**Glendora**

# **FY 2019-2020 Consolidated Annual Performance Evaluation Report (CAPER)**

*2nd Year of the 2018-2023  
Five-Year Consolidated Plan*

**FINAL**  
**October 13, 2020**

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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 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 participates (as an entitlement jurisdiction) in the Community Development Block Grant Program (CDBG). This program is administered by the United States Department of Housing and Urban Development (HUD), and provides funding for a variety of different projects, with eligibility based on meeting one of the following national objectives:

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

This CAPER for FY 2019-2020 reviews the City's specific achievements over the last program year (July 1, 2019 through June 30, 2020) and an assessment of the progress in implementing the goals and objectives of the five-year Consolidated Plan. This CAPER is the second year of implementing the 2018-2023 Consolidated Plan.

Specifically, the City of Glendora has developed the following objectives, outcomes, and quantifiable goals for each priority need category listed in the 2018-2023 Consolidated Plan and FY 2019-2020 Annual Action 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). **A total of 3 projects have been undertaken to date, two are still in process and will be complete in the next fiscal year, 3,130 low and moderate-income residents benefit from the 3 projects.**
- **Economic and Human Development:** Provide for the economic development needs of low and moderate income persons. The City has developed a Small Business Assistance Program to provide economic development activity within the City and encourage local business owners to invest capital within the city. 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. **A total of zero businesses have been assisted to date.**

- **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). **A total of 66 people have been assisted to date.**
- **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 grant has been successfully implemented to date.**

The following Table 1 illustrates the proposed versus actual outcomes for each outcome measure submitted with the 2018-2023 Consolidated Plan and the progress made during FY 2019-2020.

**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: \$179,204	Facade treatment/business building rehabilitation	Business	3	0	0.00%	1	0	0.00%
Fair Housing	Fair Housing	CDBG: \$15,000	Public service activities other than Low/Moderate Income Housing Benefit	Persons Assisted	250	66	26.40%	50	28	56.00%

Infrastructure and Public Facilities	Non-Housing Community Development	CDBG: \$312,761	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit	Persons Assisted	7,309	1,085	14.84%	4,625	1,085	23.46%
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**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 in the FY 2018-2023 Consolidated Plan, are funded during each of the subsequent five years. In year one \$279,938 in CDBG funds plus \$44,128.84 of program income was expended to implement the Consolidated Plan. For FY 2019-2020 (the second year of the Consolidated Plan), the City of Glendora used its allocation of \$290,016 in CDBG funds plus \$80,748 of prior year carryover reallocated by substantial amendment as shown in Table 1 above to address the highest priorities identified in its FY 2018-2023 Consolidated Plan. An additional \$179,204 from the CARES Act became available during the program year to address COVID-19 through substantial amendment adopted May 26, 2020, which will be expended in the next fiscal year.

In FY 2019-2020, the City of Glendora addressed all of the Consolidated Plan Priorities listed above by providing CDBG funding as follows:

1. **Infrastructure and Public Facilities:** The City allocated \$206,422 to the Street Improvement Project (Bonita Avenue and Dale Road) to rehabilitate the badly deteriorated pavement on Bonita Avenue and Dale Road, located in Census Tract 4039.02 Block Group 3, which has a population of 1,570 persons, of which 820 (52 percent) are considered low- and moderate-income. In addition, the City allocated \$106,339 to another Street Improvement Project (three cul-de-sacs North of Colorado Avenue: Cullen Avenue, Marion Place, and Scott Place), to rehabilitate the pavement, curb, gutter and sidewalk to benefit a low-mod income target area. Census Tract 4011.01 Block Group 4 has a population of 2,240 persons, of which 1,225 (59.6 percent) are considered low- and moderate- income residents. These two projects were combined into one by a technical amendment since the project was bid as one job. During the program year \$425 was expended and the remaining funds will be expended in the next fiscal year. While the annual goal was not met, the City is on target to meet the five-year goal.

In FY 2018-2019, the City allocated \$207,451 to the Public Works Department to complete one (1) project, the Street Improvement Project (Laxford Street and Vecino Avenue). The Street Improvement Project rehabilitated the badly deteriorated pavement on Laxford Street from Grand Avenue to Vecino Avenue and on Vecino Avenue from Laxford Street to Bonita Avenue. The construction contract was awarded by the City Council on January 22, 2019 in the amount of \$216,114.36. There was one change order for additional scope of work considering field conditions and unforeseen discovery of Petromat in the amount of \$30,942.40. The final construction contract cost was \$247,471.76, all of which was expended. This project benefitted approximately 1,725 people living in the low- and moderate-income area of Census Tract 4039.02 Block Group 3; 1,085 of which were low- and moderate-income. The City also allocated \$6,500 to the Community Services and Public Works Departments for the Glendora Public Library Signage Update for ADA Accessibility Project to benefit 3,540 people; however, the Glendora Public Library decided not to move forward with the project.

2. **Economic and Human Development:** No funds were allocated to Economic Development in FY 2019-2020. In FY 2018-2019, the City allocated \$25,000 to the Economic Development Department to administer the Small Business Assistance Loan Program; however, the City received comments from potential participants that \$25,000 is not usually an adequate loan. Therefore, the City rolled over unspent program funds from previous years (\$27,442.55 - FY 2015-16, \$3,305.50 - FY 2016-17, and \$25,000 – FY 2017-18) to the FY 2018-2019 Economic and Human Development program to provide for larger size loans. 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. While the annual goal was not met, the City expects to meet the five-year goal.
3. **Fair Housing:** The City allocated \$15,000 to the Housing Rights Center. In FY 2019-2020 a total of \$15,000 was expended and 28 persons were provided fair housing and landlord/tenant services meeting 56 percent of the annual goal. In FY 2018-2019, \$15,000 was allocated/expended and 38 persons were assisted.
4. **Administration and Planning:** In FY 2019-2020, the City allocated \$43,003 and expended \$6,405.75 for general planning and administration. In FY 2018-2019, the City allocated \$40,987 and expended \$7,203.75. The CDBG grant was administered in accordance with federal regulations, which met the annual goal.
5. **CARES Act CDBG-CV:** To address the Coronavirus Pandemic, HUD released additional funding that the City allocated to two projects: 1) the CDBG-CV Small Business Assistance Loan Program was allocated \$143,364 to create or retain jobs for low- and moderate-income residents of businesses affected by COVID-19. It is estimated that 8-15 businesses will be assisted helping to retain approximately 5 full time equivalent LMI jobs through the Business Assistance Program; and 2) Administration of the Business Assistance Program \$35,840.

Figures 1-3 below illustrate the geographic locations of the Street projects as related to the low and moderate-income target areas.

**Figure 1 - Street Improvement Project (three cul-de-sacs North of Colorado Avenue: Cullen Avenue, Marion Place, and Scott Place)**

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

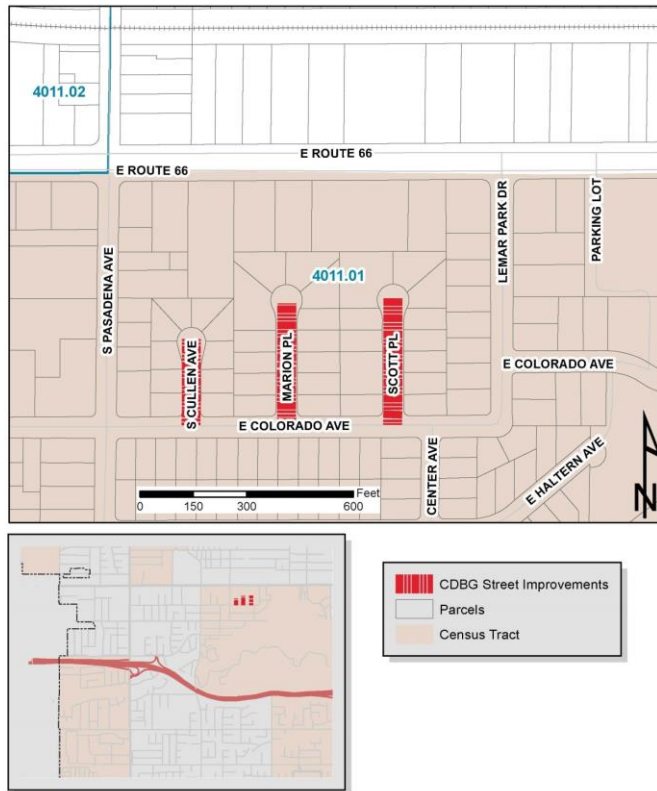


Figure 2 - Street Improvement Project (Bonita Avenue and Dale Road)

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

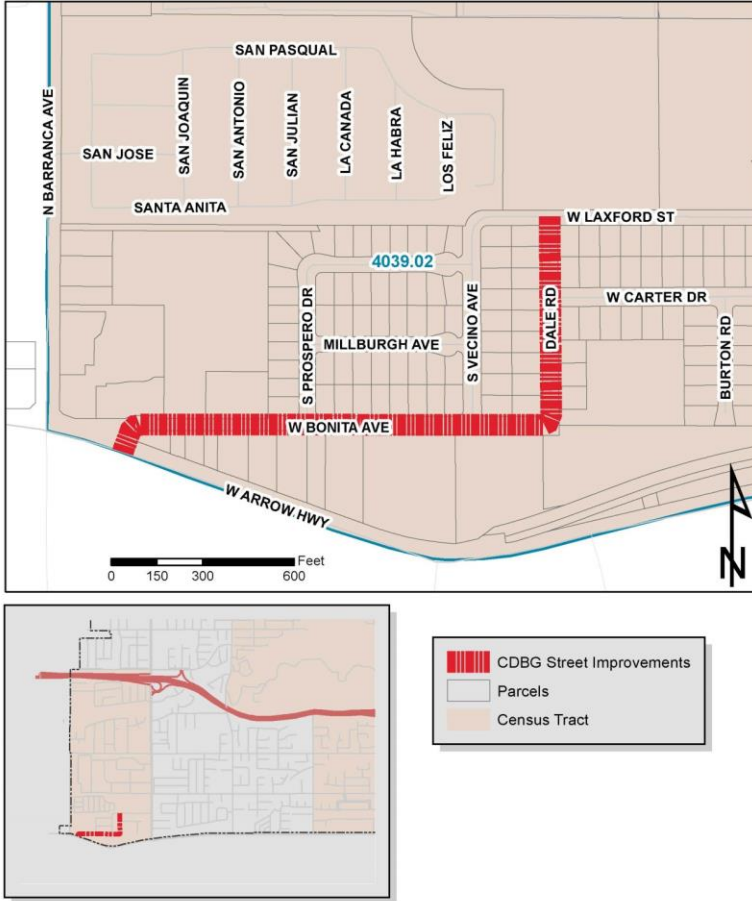
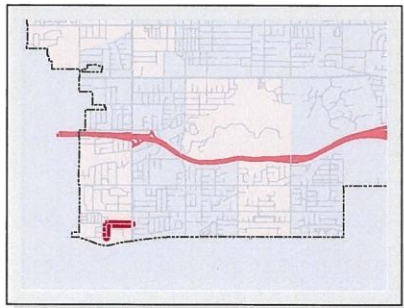
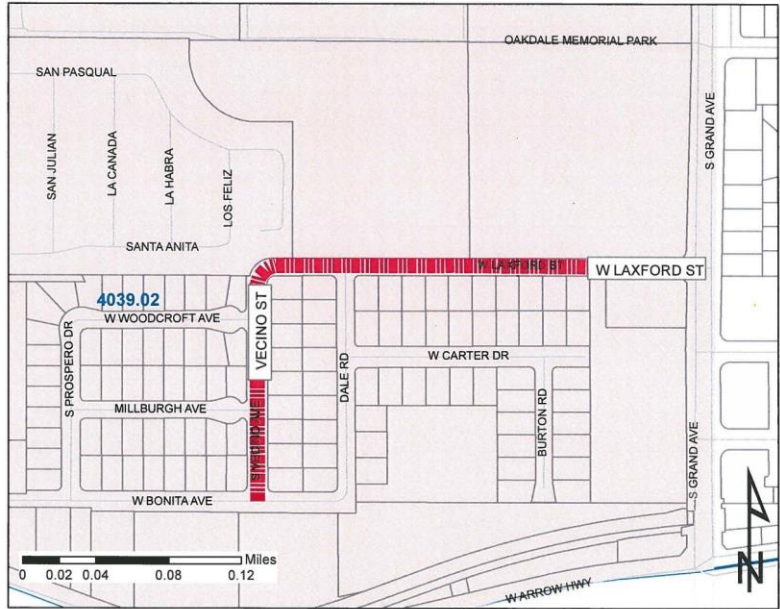


Figure 3 - Street Improvement Project (Laxford Street and Vecino Street)



# FY 2018-2019 CDBG Eligible Areas and Street Resurfacing Project



CDBG Street Improvements  
 Census Tract 4039.02

**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)**

	<b>CDBG</b>
White	28
Black or African American	0
Asian	0
American Indian or American Native	0
Native Hawaiian or Other Pacific Islander	0
<b>Total</b>	<b>28</b>
Hispanic	11
Not Hispanic	17

**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 during the program year and is reflective of the persons assisted through the Fair Housing Program administered by the Housing Rights Center. A total of 28 persons were assisted; 11 were Non-Hispanic and 17 were Hispanic.

## 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	\$425,083.90	\$21,830.47

Table 3 - Resources Made Available

### Narrative

For FY 2019-2020, the City had available \$290,016 in CDBG entitlement allocation, \$80,748 of program income, and \$95,899.90 in prior years unspent funds, for a total available funds of \$425,083.90. In addition, the City received CARES Act funds in the amount of \$179,204 to be used for the Business Assistance Program and Administration to address needs related to the Coronavirus.

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 2019-2020 CDBG One-Year Annual Action Plan included the following projects:

### Activity/Amount

- General CDBG Administration: \$43,003 allocated/\$6,405.47 expended
- Fair Housing: \$15,000 allocated/\$15,000 expended
- Street Re-Surfacing Project: \$312,761 allocated/\$425.00 expended
- Business Assistance Program: \$0 allocated/\$0 expended
- CDBG-CV Administration \$35,840/\$0 expended
- CDBG-CV Small Business Assistance Loan Program \$143,364/\$0 expended

**Total CDBG for Fiscal Year 2019-2020: \$549,968.00 allocated/\$21,830.47 expended**

PR26 in the appendix details the funding available and expenditures.

### 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 as follows:

- CDBG Administration and Fair Housing Services were provided citywide to all residents.
- The Street Improvement Project, which is administered by the Public Works Department, took place on residential streets of the low- and moderate-income area of Census Tract 4039.02 Block Group 3 and Census Tract 4011.01 Block Group 4.

The Business Assistance Program was available primarily to neighborhood-serving businesses located in the City's low- and moderate-income areas and citywide to low- and moderate-income business owners that will create/retain jobs for low- and moderate-income persons. However, no new loans were made during FY 2018-19 or FY 2019-2020.

## **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 2019-2020, no funds were leveraged; however, the City does benefit from County funding for rental assistance provided by HUD through the Housing Choice Voucher program. Table 5 reports the number of households assisted with vouchers. As Housing Choice Vouchers are portable, the number of voucher recipients in the City tends to fluctuate.

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	35	36
Number of Special-Needs households to be provided affordable housing units	0	0
<b>Total</b>	<b>35</b>	<b>36</b>

Table 5 – Number of Households

	One-Year Goal	Actual
Number of households supported through Rental Assistance	35	36
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
<b>Total</b>	<b>35</b>	<b>36</b>

Table 6 – Number of Households Supported

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

Given the limited funds, the City does not utilize CDBG funds for affordable housing activities. During FY 2019-2020 the City addressed affordable housing needs through the following programs:

- Section 8 Rental Assistance (DH-2):** The City continued to provide Housing Choice Vouchers (Section 8 rental assistance) to extremely low- and low-income households through the Housing Authority of Los Angeles County (HACoLA). 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-household.

- Fair Housing Program (DH-1):** The City’s Fair Housing Program is administered by 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 2019-2020 resulted in 28 persons assisted with fair housing services by the Housing Rights Center. Among the assisted persons, 21 were extremely- low-income, six were low-income, and one was moderate-income (0-50 percent AMI). Among those assisted, seven were disabled and four 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	21	0
Low-income	6	0
Moderate-income	1	0
<b>Total</b>	<b>28</b>	<b>0</b>

**Table 7 – Number of Households Served**

**Narrative Information**

As stated above, during FY 2019-2020 the City addressed affordable housing needs through the following programs:

- Section 8 Rental Assistance (DH-2):** The City continued to provide Housing Choice Vouchers (Section 8 rental assistance) to extremely low- and low-income households through the Housing Authority of Los Angeles County (HACoLA). Overall, 35 low-income (0-50 percent AMI) renter-households were to be assisted, which included elderly, single-parent, and 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. Of the 36 persons assisted, 16 were elderly and 19 were disabled persons. No owner-households were assisted.

- **Fair Housing Program (DH-1):** The City's Fair Housing Program is administered by 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 2019-2020 resulted in 28 persons assisted with fair housing services by the Housing Rights Center. Among the assisted persons, 21 were extremely- low-income, six were low-income, and one was moderate-income (0-50 percent AMI). Among those assisted, seven were disabled and four were seniors.

In addition, the City funded two (2) 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, which will be 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**

According to the 2019 Point-in-Time Homeless Count by the Los Angeles Homeless Services Authority (LAHSA), the City of Glendora currently has an unsheltered homeless population of 65 persons. Given the limited resources and small amount of homeless in the City of Glendora, homeless activities were been given a low priority in the 2018-2023 Consolidated Plan and subsequent annual action plans. The City is relying on coordinated efforts with LAHSA to provide shelter opportunities; the East San Gabriel Valley Coalition for the Homeless to provide information, counseling, and referral services to homeless persons that reside in Glendora; and the Glendora Welfare Agency's Operation Improvement Program to provide financial assistance to homeless or those that are at-risk of being homeless. Motel vouchers, transportation services, food, clothing, gasoline vouchers, rental assistance, utility payments and referral services are provided through this program.

### **Addressing the emergency shelter and transitional housing needs of homeless persons**

As stated above, the City is relying on coordinated efforts with the Los Angeles Homeless Services Authority (LAHSA) to provide shelter opportunities; the East San Gabriel Valley Coalition for the Homeless to provide information, counseling, and referral services to homeless persons that reside in Glendora; and the Glendora Welfare Agency's Operation Improvement Program to provide financial assistance to homeless or those that are at-risk of being homeless. Motel vouchers, transportation services, food, clothing, gasoline vouchers, rental assistance, utility payments and referral services are provided through this program.

### **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**

As stated above, the City is relying on coordinated efforts with LAHSA, the East San Gabriel Valley Coalition for the Homeless, and the Glendora Welfare Agency's Operation Improvement Program to make the transition to permanent housing and independent living, including shortening the period of time.

### **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**

As stated above, the City is relying on coordinated efforts with LAHSA, the East San Gabriel Valley Coalition for the Homeless, and the Glendora Welfare Agency's Operation Improvement Program 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.

Glendora Homelessness Plan: With voters approving Measure H in 2017, the County of Los Angeles and United Way Home for Good Funders Collaborative offered grants to local cities to develop a community plan for responding to homelessness. The goal is to present actionable items over the next three (3) years that the City can take to implement, enhance, and share resources to better address the concerns arising with this particular segment of our community. 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.

In addition, the City of Glendora, in collaboration of four other San Gabriel Valley cities (Azusa, Covina, Duarte, and West Covina) applied for Los Angeles County Measure H funds under the Priority Area of enhancing County Service systems for those experiencing or at-risk of homelessness. A grant of \$343,250 has been awarded to these five communities to retain case managers to assist the homeless.

The new Measure H grant from Los Angeles County will provide case management services to the homeless and those at risk of homelessness in five cities (Azusa, Covina, Duarte, Glendora, and West Covina).

### **Worst Case Needs**

Based on the limited amount of resources available to the City, statutory restrictions, and the Priority Needs established in the Consolidated Plan, staff recommendations for FY 2019-2020 were:

1. Administration: CDBG Administration and Fair Housing
2. Activities: Street Improvements and Business Assistance Program

The worst-case housing needs and needs of persons with disabilities were addressed through Housing Choice Vouchers and the Fair Housing Program.

## **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.

The City updated its Housing Element update for the 2013-2021 planning period in 2013. 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, funding and staff resources are no longer available to continue that level of service.

### **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 Business Assistance Program (formerly the Commercial Facade Improvement Program). This program intends to assist neighborhood-serving businesses in low- and moderate-income areas and businesses with low- and moderate income owners. This program will create/retain jobs for unemployed and underemployed low- and moderate income persons; thereby, reducing the number of families living in poverty.

### **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. No certifications of consistency were requested/signed during the fiscal year.

### **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 sub-recipients 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. Sub-recipients are also required to submit their annual financial audits, and all invoices submitted must include appropriate backup information to support the release of funds.

The City makes monitoring visits to each of the sub-recipients to review all of this information to ensure compliance with federal, state, and local regulations. Copies of the finding of each monitoring visit are available in the sub-recipient's CDBG Program file. As a result of the annual monitoring of each sub-recipient, several agencies improved the quality of quarterly and annual reporting accomplishments and the City confirmed that all programs were in compliance with federal regulations.

In FY 2018-2019, the City did not conduct any monitoring visits. The City conducted desk audits of City departments and HRC in FY 2019-2020.

## **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 24, 2020 through October 8, 2020. A notice was posted on the City's website and published in the newspaper on September 24, 2020. The proof of publication can be found in the Appendix. The City Council reviewed the document at their regularly scheduled meeting on October 13, 2020. 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.**

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