



CITY OF UPLAND

**CONSOLIDATED ANNUAL PERFORMANCE AND
EVALUATION REPORT (CAPER)**

**Program Year 2022-23
September 2023**

Consolidated Annual Performance and
Evaluation Report (CAPER) PY 2022-23
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Attachments:

- *IDIS Reports*
 - *PR 26 – CDBG Financial Summary Report*
 - *PR 23 – CDBG Summary of Accomplishments*
 - *PR 06 – Summary of Consolidated Plan*
 - *PR 03 – CDBG Activity Summary Report*
- *Monitoring Standards*
- *Public Notice*
- *CDBG Map*

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.

The Program Year (PY) 2022 Consolidated Annual Performance and Evaluation Report (CAPER) reflects the City of Upland's efforts to coordinate funding in order to deliver comprehensive community development projects and services to its citizens. This report summarizes how federal funds were invested from July 1, 2022 - June 30, 2023, to meet the goals and objectives identified in the Fiscal Year (FY) 2020-2024 Consolidated Plan and Substantial Amendment to the FY 2020-2024 Consolidated Plan that accounts for the City's allocation of CDBG-CV funds (also referred to as CARES Act Funds). The City's partnership with the U.S. Department of Housing and Urban Development (HUD) has enabled significant investments in the neighborhoods. The Community Development Block Grant (CDBG) funds received from HUD have provided infrastructure improvements, façade rehabilitation, homeless prevention, neighborhood preservation, fair housing services, economic opportunities, and public services.

The PY 2022 CAPER reflects results from the third year of the FY 2020-2024 Consolidated Plan. The Consolidated Plan is a comprehensive document that describes the City's housing market conditions, identifies the need for affordable housing and community development and provides strategies to address the needs over a five-year period. The Consolidated Plan provides vision for community development and housing actions with the primary goals of also providing economic development opportunities, business enhancement through façade rehabilitation, improve neighborhoods, improve public facilities and infrastructure, provide public services for low-income residents, prevent and eliminate homelessness, housing preservation, and ensure equal access to housing opportunities.

The following narratives evaluates the proposed goals and objectives of each activity listed in the PY 2022 Annual Action Plan with what was actually accomplished during PY 2022.

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
Facade Rehabilitation	Non-Housing Community Development	CDBG: Prior Year Funds	Businesses Assisted	Businesses Assisted	15	10	67%	3	3	100%
Public Facilities Improvements	Non-Housing Community Development	CDBG: \$312,450	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit	Persons Assisted	2,000	780	39.00%	1000	0	0%
Public Services for low-income families	Non-Housing Community Development	CDBG: \$68,531.50	Public service activities other than Low/Moderate Income Housing Benefit	Persons Assisted	2,375	1866	79%	518	487	94%
Homeless Preservation Services	Homeless	CDBG: \$23,000	Homeless Prevention	Persons Assisted	295	228	77%	26	38	146%
Fair Housing Services	Affordable Housing	CDBG: \$45,500	Other	Other	2,500	1118	45%	280	290	104%
Housing Preservation	Affordable Housing	CDBG: Prior Year Funds & \$97,188.53	Homeowner Housing Rehabilitated	Housing Units	50	36	72%	10	17	170%
Economic Opportunity	Non-Housing Community Development	CDBG: Prior Year Funds	Direct Financial Assistance to For-Profits	Jobs	10	31	310%	2	2	100%

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

COVID-19 Allocations

In response to the COVID-19 pandemic, Congress passed the Coronavirus Aid, Relief, and Economic Security (CARES) Act and it was signed into law on March 27, 2020, authorizing \$2.2 trillion for a variety of measures to prevent, prepare for, and respond to the COVID-19 pandemic. Under the CARES Act, HUD provided special allocations of CDBG funds to the City of Upland. In total, the City received \$873,743 of CDBG-CV funds to prevent, prepare for, and respond to the COVID-19 Pandemic.

CDBG-CV funds were used by the City of Upland and its nonprofit partners to address health, housing, and safety needs of Upland residents. Pursuant to the CARES Act, HUD awarded formula grant allocations of CDBG-CV funds to CDBG entitlement jurisdictions in two funding rounds.

CDBG-CV funds must be fully spent by June 24, 2026. The City of Upland made significant progress (94%) toward each expenditure goal during the 2021-2022 Program Year.

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 development of the 2020-2025 Consolidated Plan, a set of eight priority needs were identified

- Façade Rehabilitation
- Neighborhood Preservation
- City of Upland Public Facility Improvements
- Public Services for low-income families
- Homeless prevention services
- Fair housing services
- Economic opportunity
- Affordable housing preservation

During the PY 2022-23 (July 1, 2022 through June 30, 2023) the City expended approximately \$1,042,283.72 in CDBG entitlement funds along with \$20,245.09 in CDBG-CV funds to address the priority needs outlined in the City's Consolidated Plan.

To help remove obstacles to meeting underserved needs and improve service delivery the City of Upland is an active participant in San Bernardino County's Continuum of Care (CoC) and Interagency Council on Homelessness that regionally addresses homelessness and supports the goals and objectives outlined in the CoC's 10 Year Strategy to End Homelessness. The City also supports the efforts of Housing Authority of the County of San Bernardino (HACSB), who is the largest provider of affordable housing in San Bernardino County. Internally, the City consistently evaluates the effectiveness of Consolidated Plan and monitors its subrecipients to ensure that its CDBG program continues to make progress in addressing its strategic plan goals and objectives and makes adjustments when necessary.

Strategic Plan Goal / Activity	Unit Measure	5-Year Goal	FY 20/21	FY 21/22	FY 22/23	FY 23/24	FY 24/25	YTD Total
Priority 1 – Economic Opportunity		10	2	2	2	2	2	
Business Assistance & Attraction Program- FY 16-17	<i>Jobs</i>		3	Complete				3
Business Assistance & Attraction Program- FY 17-18	<i>Businesses</i>		2	open	open			2
Business Assistance & Attraction Program- FY 18-19			N/A	1	open			1
Business Assistance & Attraction Program- FY 19-20			N/A	N/A	open			N/A
Business Assistance & Attraction Program- FY 20-21			N/A	N/A	2			2
Business Assistance & Attraction Program- FY 21-22			N/A	N/A	open			N/A
Upland Small Business Support- FY 20-21 CDBG-CV			N/A	23	close			23
Priority 2 – Business Enhancement Through Façade Rehabilitation		15	3	3	3	3	3	
Downtown Façade Program - FY 18-19	<i>Business</i>		3	2	close			5
Downtown Façade Program - FY 19-20	<i>Business</i>		N/A	2	1			3
Downtown Façade Program - FY 20-21			N/A	N/A	2			2
Downtown Façade Program - FY 21-22	<i>Business</i>		N/A	N/A	open			N/A
Priority 3- Neighborhood Preservation	<i>People</i>	60,000	12,000	12,000	12,000	12,000	12,000	

Graffiti Removal in CDBG Areas (inspections)		Inspections	911	Program Inactive	Program Inactive	911
Priority 4 – Public Facilities and Infrastructure Improvements						
	Landecena Improvements- FY 19-20 complete; FY 22-23 open	People	Const.	780 Complete	open	780
	Parking Lot Project FY 22-23				open	
	Parklet Project- FY 20-21 CDBG-CV	People	open	open	open	
Priority 5 - Provide Public Service to low-income residents						
	His Hands Ministry – Food Pantry –	People	309	341	475	475
	Inland Valley Hope-Food Security Program- FY 22-23			166	166	1,123
	Aging Next- Senior Services- FY 21-22	People	N/A	9	N/A	9
	Upland Community Resource Center-	People	N/A	28	17	45
	Upland Community Resource Center- FY 20-21 CDBG-CV		N/A	34	open	34
	His Hand Food Program- FY 20-21 CDBG-CV	People	N/A	54 Complete	N/A	54
	Senior Grocery Delivery- FY 20-21 CDBG-CV	People	N/A	155 Complete	N/A	155
	Inland Valley Hope- Food Security Program- FY 20-21 CDBG-CV	People	N/A	382 Complete	N/A	382
	Inland Valley Hope- Recovery Services- Food Voucher- FY 20-21 CDBG-CV	People	N/A	26 Complete	NA	26

Inland Valley Recovery- Bus Passes Program- FY 20-21

	People	43	Program Inactive	N/A	59	59	43
Priority 6 – Homeless Prevention Services		295	59	59	59	59	43
Foothill Family Shelter-	People	57	4	29			90
Pacific Lifeline (Woman’s Transitional Housing)-	People	4	7	9			20
Impact Southern California- Homelessness Prevention- FY 21-22	People	N/A	10	N/A			10
Pacific Lifeline (Woman’s Transitional Housing)- FY 20-21 CDBG-CV	People	N/A	13 Complete	NA			13
U-HOPE-Upland Homeless Outreach Prevention Education- FY 20-21 CDBG-CV	People	N/A	19	open			19
Foothill Family Shelter- FY 20-21 CDBG-CV	People	N/A	72	10			82
U-HOPE-Upland Homeless Outreach Prevention Education- FY 20-21	People	4	Program Inactive	N/A			4

Priority 7 – Fair Housing Services

Fair Housing Services -	People	2,500	500	500	500	500	500
Landlord and Tenant Mediation Services -	People	495	333	290			1,118

Priority 8 – Housing Preservation

Emergency Repair Program- FY 18-19	Households	5	Complete	N/A			5
Emergency Repair Program- FY 19-20	Households	4	9	close			13

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Emergency Repair Program- FY 20-21

<i>Households</i>	N/A	1	9/ complete	10
Emergency Repair Program- FY 21-22	<i>Households</i>	N/A	8/ complete	8

Strategic Goals and Outcomes

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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	456
Black or African American	71
Asian	17
American Indian or American Native	13
Native Hawaiian or Other Pacific Islander	6
American Indian/Alaskan Native & White	5
Black/African American & White	8
Asian & White	1
Other Multi-Racial	44
Total	621
Hispanic	320
Not Hispanic	301

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

Narrative

As a recipient of CDBG funds, the City must maintain data on the extent to which each racial and ethnic group, single head of households have applied for, participated in, or benefited from any program or activity funded in whole or in part by CDBG funds. The data in this table is supplied by HUD's database. The figures in this table represent the sum of the number of people, families, households or housing units reported during the Program Year, without regard to the number of people in each family, household or housing unit.

CR-15 - Resources and Investments 91.520(a)

Identify the resources made available.

Source of Funds	Source	Resources Made Available	Amount Expended During PY 2022-23	Remaining Balance
CDBG PY 2022-23	Federal	\$1,538,267.66	\$1,046,622.72	\$491,644.94
CDBG-CV PY 2020	Federal	\$873,743.00	\$20,245.09 (\$782,697.10 previous years)	\$70,800.81

Table 3 - Resources Made Available

(*) Note: "Resources Made Available" category is comprised of annual grant allocation, received program income, and carryover/unspent fund from previous years.

Narrative

The above data is from the HUD IDIS system. The summary of CDBG resources includes \$610,210 in entitlement for PY 2022-23, \$13,002.03 of unspent fund from the previous year to support CDBG Capital Improvement activities, and \$915,055.63 carryover from previous years. The amount expended during PY 2022-23 was \$1,042,283.72.

Under the CARES Act, HUD provided special allocations of CDBG funds to the City of Upland. In total, the City received \$873,743 of CDBG-CV funds to prevent, prepare for, and respond to the COVID-19 Pandemic.

Identify the geographic distribution and location of investments.

Target Area	Planned Percentage of Allocation	Actual Percentage of Allocation	Narrative Description
Citywide	35%	70%	Admin, Public Service Activities, ERP, and Landecena Project
Historic Downtown	65%	30%	CRP, BAAP, Parking Lot Project
Low- and Moderate-Income Census Tracts/Block Groups	0%	0%	

Table 4 – Identify the geographic distribution and location of investments.

Narrative

During the FY 2022-23, the City expended CDBG funds in a manner consistent with meeting the National Objectives of the program. A total of 90.58 of the CDBG funds were expended for activities that benefit low to moderate income persons. The percentage includes Administrative and Planning activities. The City's investment in Fair Housing Services, Homelessness Prevention Services, Housing Preservation and Public Service projects are based on a citywide geography because individuals in need of these services may live anywhere within the jurisdiction. Neighborhood Preservation is based on the CDBG low-moderate census tract area, and Public Facilities or infrastructure Improvements are also based on low moderate census tract areas.

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.

Leveraged Resources:

The CDBG Program does not require matching funds, but CDBG funds are leveraged by many other resources in the community. The City aggressively pursues private, state, and local grant opportunities to leverage its federal award to support its affordable housing, community development, economic development, and homeless prevention goals and objectives. The City's leveraging resources include but are not limited to the following programs:

Local Housing Asset Funds

Rent revenues generated from City owned apartment complexes assist in the development of affordable housing for the elderly and large family housing and relieve some lower income households from their housing cost burdens.

HOME/CALHOME Funds

The City has received State HOME and CalHome funding to assist in improving the housing stock in various federally designated target areas. In FY 2022-23, HOME/CalHome/Housing Rent Revenue funds were expended, which assisted one (1) Home Improvement owner occupied loans, zero (0) multi-family housing units were made affordable through the Rental/Acquisition Program, and zero (0) individual was assisted through the First Time Home Buyer Program. The Housing fund preserved two (2) units through its Emergency Repair Grant.

Permanent Local Housing Allocation

The City received State Permanent Local Housing Allocation to support the its Upland Homeless Outreach, Prevention and Education (U-HOPE) program and Rental Acquisition, New Development, and/or Rehabilitation project.

In PY 2022-23, the City U-HOPE program assisted 18 homeless persons and/or persons at risk of homelessness with temporary housing subsidies and support services. The City will initiate its PLHA Rental Acquisition, New Development, and/or Rehabilitation project in PY 2023-24

Continuum of Care

San Bernardino County Continuum of Care (CoC) is a regional planning body that coordinates housing and service funding. Most recently the COC released a Notice of Funding Opportunity (NOFO) for State CoC Homeless Housing, Assistance and Prevention Program (HHAP) funding to provide jurisdictions with a one-time grant to support regional coordination and to expand or develop local capacity to address immediate homelessness challenges throughout California. In PY 2022-23 CoC funds were not utilized by the City to address its homelessness issues. Staff will continue to explore the use CoC funds to support its homeless prevention efforts.

HOME/ESG Funding

The City is not a direct recipient of HOME Investment Partnership (HOME) or Emergency Solutions Grant (ESG) funds and is not required to meet the matching requirements of these grant funds.

Publicly Owned Lands

During the program year, the City did not identify or use any publicly owned land or property located within the jurisdiction to address the unmet needs identified in the Consolidated Plan.

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.

Affordable housing that has received public subsidies in return for long-term affordability covenants represent a significant component of the City of Upland’s affordable housing inventory. Currently, 688 out of 1,327 units supported with public subsidies are affordable to households earning less than 80% of the Area Median Income for San Bernardino County.

The table below compares the City’s annual goals for PY 2022-23 with the actual number of completed CDBG-assisted units.

	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	10	17
Number of households supported through Acquisition of Existing Units	0	0
Total	10	17

Table 6 – Number of Households Supported

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	5	0
Low-income	6	0
Moderate-income	6	0
Total	17	0

Table 7 – Number of Households Served

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

Preservation of the physical and functional integrity of existing housing units occupied by low- and moderate-income households is seen as an effective way to invest limited resources to existing housing units that are already affordable to low- and moderate-income households in the community. For PY 2022-23, the City’s served 17 households with Owner-Occupied Residential Rehabilitation services. Outpacing its annual goal by 70 percent (70%). Staff attributes this increase in outcomes due to construction schedules that span the course of two fiscal years resulting in outcomes to be reported in one fiscal year and project accomplishments to be reported in subsequent years and COVID-related delays such as difficulties obtaining necessary materials to complete the project , and worker shortages.

Discuss how these outcomes will impact future annual action plans.

The City’s housing needs far exceeds the resources available to address these needs. According to the Consolidated Plan’s market analysis, more than 59 percent of the City’s housing units are older than forty years of age and in need of substantial rehabilitation. For this reason, the City will continue to support housing rehabilitation activities as a means to preserving its affordable housing stock over the next few years.

Narrative Information

The City is not a direct recipient of HUD HOME funds and will continue seek other means to create affordable housing opportunities within the City. The City will also continue to utilize its CDBG funds to support fair housing services, neighborhood preservation, homelessness prevention, facilities or infrastructure, housing preservation and public services for low-income families.

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

Homelessness is addressed regionally through the San Bernardino County Continuum of Care (CoC) also known as the San Bernardino County Homeless Partnership (SBCHP). The SBCHP consists of three distinct bodies; the San Bernardino County Interagency Council on Homelessness (ICH), the Homeless Provider Network (HPN); and San Bernardino County Office of Homeless Services (OHS). The SBCHP was developed to promote a strong collaboration between agencies, county and local governments to provide for the direct planning, development, and implementation of the San Bernardino County Homelessness Action Plan, which was adopted in September 2019.

Point-In-Time (PIT) Count

HUD requires CoCs across the country to conduct a comprehensive count of the homeless population every year. The PITC is a observational count and survey of sheltered and unsheltered people experiencing homelessness on a single night in January. The purpose of the PIT Count is to track the number, demographics and needs of people experiencing homelessness throughout the country over time. HUD uses the data collected from the PIT Count to evaluate the effectiveness of local agency efforts to address homelessness and to determining funding amounts for them, and also complies this data into the Annual Homeless Assessment Report (AHAR), which is provided to Congress.

According to the results of the most recent data available from the Point-in-Time Homeless Count (PIT Count) held on January 26, 2023, on any given night in San Bernardino County there are 1,219 sheltered and 2,976 unsheltered homeless individuals or families. The PIT Homeless Count for Upland totaled 80 homeless individuals or families (48 sheltered and 32 unsheltered), a decrease from the 2022 PIT Homeless Count of 89 counted in Upland.

City of Uplands Homeless Prevention Efforts

As an active member of the SBCHP, the City of Upland supports the actions of the CoC/SBCHP in every way. Outside of the SBCHP, the City utilized CDBG funds and PLHA funds to support the City's U-HOPE program. The U-HOPE program provided street outreach services and case management services to the homeless and those persons at risk of becoming homeless. In PY 2022-23, a total of 18 persons were assisted.

To improve the City's efforts in reaching its homeless population and link them to resources to keep them stably housed, the City will continue be an active participant in the CoC's Interagency Council on Homelessness to support regional coordination and develop local capacity to address immediate homelessness challenges.

Addressing the emergency shelter and transitional housing needs of homeless persons

The city places a high priority on programs that work to prevent homelessness or rapidly connect homeless individuals with housing and supportive services. prevention resources, , emergency voucher

programs, and transitional housing. During FY 2022-23 these the following programs assisted a total of 56 Upland residents that were homeless or at risk of becoming homeless:

- **Permanent Local Housing Allocation (PLHA) Grant**
The U-HOPE program was instrumental in finding short-term housing to the homeless and assisted in locating more long-term housing for these households. During FY 2022-23, these programs assisted a total of 18 Upland residents that were homeless or at risk of becoming homeless.
- **CDBG Program**
Stepping Stone Program (Foothill Family Shelter) and the Woman's Program (Pacific Lifeline) with CDBG funds and assisted these public service programs to prevent and eliminate homelessness including, but not limited to, transportation, utility assistance, bridge housing, homeless prevention resources, , emergency voucher programs, and transitional housing. During FY 2022-23, these programs assisted a total of 18 Upland residents that were homeless or at risk of becoming homeless.

The lack of affordable housing continues to be the primary factor of homelessness throughout the County and has led to high rent burdens, overcrowded living conditions, and substandard housing. The City will continue to: 1) support the CoC's mission of providing a system of care that is inclusive, well planned, coordinated and evaluated and is accessible to all who are homeless or at-risk of becoming homeless; 2) ensure that City regulations are consistent with current law that will support the establishment and operation of emergency shelters and transitional housing needs; and 3) support homeless service providers that provide community outreach and homeless prevention services that help households at-risk of becoming homeless or are literally become stably housed.

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 an activity member of the San Bernardino County CoC and ICH, the city supports the efforts of the San Bernardino County's Health Committee (a subcommittee of the CoC and ICH) who is responsible for the development of collaborative solutions to the challenges associated with providing health care to unsheltered and sheltered homeless individuals, and families, and adults, and children at-risk of homelessness. The Health Committee seeks to improve the coordination and communication between health care and homeless service providers to bridge the gap between the homeless and health-related services.

To help low-income individuals and families receive assistance from public and private agencies that address housing, health, social services, employment, transportation, education or youth needs, the City will promote the use of 2-1-1- San Bernardino County, a toll-free number that is a one-stop connection to thousands of community service for people in need (e.g., homeless, at-risk of homelessness, veterans,

senior citizens, persons with disabilities, etc.).

The city also provides a resource brochure on housing and supportive services available through its U-HOPE program conducted through the city's Police Department. Its CDBG homeless prevention services programs offered outreach opportunities for the homeless community and provided a mechanism to inform special populations, such as veterans, of housing options available. During FY 2022-23 these programs assisted a total of 56 Upland residents that were homeless or at risk of becoming homeless.

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

Lack of knowledge about where to get treated, lack of access to transportation, and lack of identification needed to secure social benefits are the most challenging barriers for connecting homeless persons with assistance. To address these challenges the City encourages all of its homeless service providers to participate in the County of San Bernardino Homeless Management Information System (HMIS). HMIS is a coordinated system of computers that enable services, shelter, and housing providers in different locations across the County to collect and share information about the homeless individuals and families seeking services. This system allows users to collect and store information that can be used to improve service delivery for their consumers as well as generate required reports for different funding sources.

Also, in PY 2022-23, the City supported the Foothill Family Shelter and Pacific Lifeline, which provide transitional housing, counseling and case management to families at risk of homelessness and are paired with financial counseling, career coaching and other available case management services. A total of 38 Upland residents that were homeless or at risk of becoming homeless were assisted during the program year.

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

Actions taken to address the needs of public housing.

The Upland Housing Authority was formed in 1940 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 Housing Authority County of San Bernardino (HACSB) has administered the Upland Housing Authority (UHA) conventional public housing and Section 8 voucher program in the City of Upland since July 2017.

The HACSB will continue to manage, maintain, and provide public housing through Section 8 vouchers and the Los Olivos program. According to UHA's 2015 five-year plan, it may attempt to project-base some of its Section 8 Vouchers in the upcoming five-year period. Efforts to address "worst case" needs, (people who pay more than 50% of their income in rent or those who live in seriously substandard housing) are assisted by programs like Section 8 and Fair Housing programs.

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

The Housing Authority's Resident Advisory Board (RAB) is instrumental in helping review and discuss critical issues that affect residents and program participants. On an ongoing basis, Housing Authority staff work closely with RAB members to discuss potential policy changes, get feedback on messaging and communication to residents, recruit participants for hearings, special events and more. The board may include a mix of participants from the Term-Limited Lease Assistance Program, Project Based Voucher Program, Veterans Affairs Supporting Housing (VASH), and the Tenant-Base Voucher Program.

The Housing Authority also provides homeownership opportunities through its Homeownership Assistance Program. This program helps tenants from their rental units move to a home of their own by providing mortgage assistance for up to 15 years for working families and up to 30 years for disabled families if the homeowners meet income requirements.

Actions taken to provide assistance to troubled PHAs.

No actions taken to provide assistance to troubled Public Housing Authority, as the Upland Housing Authority is not considered troubled.

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)

State legislature has declared that an adequate supply of housing is a matter of statewide importance. To address the State's declaration, the City is required to prepare and submit a report, called the Housing Element, to the State of California Department of Housing and Community Development (HCD) for their review and approval. The Housing Element is one of seven required elements to be included in the City's General Plan. The Housing Element identifies priority goals, policies, and programs that directly address the housing needs of current and future City residents for all income levels.

When population forecasts are updated, cities like Upland must update their plans based on a specific number and types of housing they need to meet future needs. On October 24, 2022, City Council approved the City's Housing Element Update that included the following substantive revisions:

- An improved definition of "Family to ensure compliance with fair housing law,
- The review and revision of procedural requirements to permit group homes for seven or more person in all zones allowing residential uses
- Additional incentives and strategies to encourage the construction of Accessory Dwelling Units (ADU)
- Elimination of the use permit requirement for multi-family residential development
- The review of parking requirements for muti-family development and include programs to address identified constraints
- The identification of adequate sites to accommodate the 2021-2029 Regional Housing Needs Allocation (RHNA) goal of constructing 5,686 housing units.

Based on this evaluation, the City has 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.

Moreover, the city is actively engaged with affordable housing developers concerning the siting of affordable housing and ensuring that the entitlement process runs smoothly from inception to completion. During 2022-23, the city continues to work with City Ventures Homebuilding, LLC., to develop 29 townhomes, with at least 15% of those homes restricted for low-income first-time homebuyers. This project is currently in the entitlement phase of development.

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

The City's Consolidated Plan reports 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 used \$84,186 in CDBG funding to support the Emergency Repair Program that provided financial assistance to income-qualified households whose homes that were in need of repair. In 2022-23, a total of 17 households were assisted. As preservation of the physical and functional integrity of existing housing units occupied by owner and

renter households is a cost-effective way to invest limited resources to retain existing housing units that are already affordable to owner and rental households in the community, the city will continue to support housing preservation programs in future years.

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. To reduce lead-based paint hazards, the City of Upland Emergency Repair Program will conduct lead-based paint testing and risk assessments for each property assisted that was built prior to January 1, 1978 and will incorporate safe work practices or abatement into the scope of work as required to reduce lead-based paint hazards in accordance with 24 CFR Part 35.

For PY 2022-23, 17 housing units were inspected for lead hazards. Of these housing units 3 were abated for lead hazards. Given the effectiveness of these procedures for addressing lead-based paint hazards, it is likely that the City will continue to implement these procedures in future years.

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 in the 2020-2024 Consolidated Plan - Strategic Plan and the 2022-23 Annual Action Plan helped reduce the number of poverty-level families by:

- Supporting activities that expand the supply of housing that is affordable to low- and moderate-income households;
- Supporting activities that preserve the supply of decent housing that is affordable to low- and moderate-income households;
- Supporting housing preservation programs that assure low income households have a safe, decent and appropriate place to live;
- Supporting public services for low- and moderate-income residents, by nonprofit organizations receiving CDBG Public Service Capacity Building Grants; and
- Supporting activities that fulfill the HUD mandate to further fair housing choice through the provision of fair housing education, counseling, anti-discrimination and landlord-tenant mediation.

During the 2022-23 program year, public service activities such as the His Hands Food Pantry, IVR Food Security, Upland Community Resource Center, Foothill Family Shelter, Pacific Lifeline Woman's Shelter, Upland's U-HOPE, and Fair Housing Services programs all contributed to reduce the number of poverty-level families within the City of Upland. A total of 833 people were assisted. Public Service activities provided essential direct services to assist low-income families; individuals or families facing homelessness or being at risk of becoming homeless.

Inland Fair Housing Mediation Board, a U.S. Department of Housing and Urban Development (HUD) approved Housing Counseling Agency, provides counseling programs to renters, landlords, and homeowners. A total of 290 persons were assisted with fair housing services during PY 2022-23.

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 providing pathways 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, Cal Fresh (formerly food stamps) and Medi-Cal. Together; these programs provide 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 residents 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 Upland is high-functioning and collaborative, particularly the relationship between local government and the non-profit sector comprised of a network of capable non-profit organizations that are delivering a full range of services to residents. A strong Development Services Department anchors the administration of the HUD grant programs and the housing, community and economic development activities that are implemented by the city. There are no identified weaknesses in the institutional structure to impede carrying out the strategies identified in the Action Plan.

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

During PY 2022-23, the city implemented the following actions to enhance coordination between public and private housing and social service agencies.

San Bernardino Continuum of Care - Homelessness

The city is an active member of the San Bernardino County Continuum of Care that addresses regional homelessness. Through this membership the City participates in the Interagency Council on Homelessness, a policy making body for the Homeless Provider Network, a group of homeless service providers located throughout San Bernardino County, to ensure that recommendations listed in the County's 10-Year Strategy to End Homelessness are realized.

Housing Authority of the County of San Bernardino – Public Housing

The City also supports the actions of the Housing of Authority of the County of San Bernardino (HACSB). HACSB is the largest provider of affordable housing in San Bernardino County who serves the families of San Bernardino County through affordable housing and rental subsidy.

CDBG Program – Housing, Community Development, Economic Development and Homelessness

As a direct of Community Development Block Grant funds from the U.S. Department of Housing and Urban Development (HUD) the City is required develop a five-year consolidated plan that dictates the use of the City federal funds in pursuit of its five-year housing, community and economic development, and homeless prevention goals. To implement this five-year Consolidated Plan, the city utilized a variety of organizations (e.g. city departments, private businesses and agencies, non-profit public service providers, housing developers, and Community Housing Development Organizations) to implement its CDBG program. For PY 2022-23 the city collaborated with the following organizations:

- Inland Fair Housing and Mediation Board (Fair Housing)
- Foothill Family Shelter (formerly St Mark's Homeless Shelter)
- Pacific Lifeline (Domestic Violence Shelter)

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 2019-2023 City of Upland Analysis of Impediments to Fair Housing Choice identified three (3) impediments to fair housing choice including Transit Access, Discrimination against Persons with Disabilities, and Lack of Rental Housing Opportunities in Northern Upland. The impediments concerning Transit Access and Discrimination against Persons with Disabilities were not fully addressed and will remain a priority as impediments during the 2019-2023 planning period.

Impediment No. 1 - Transit Access

Transit provides elderly residents, low-income residents, youth, and others access to jobs, medical facilities, parks, housing, and public services. Omnitrans, the City's transit provider, has adopted service standards to ensure an equitable distribution of services. For instance, all areas having a minimum residential density of 3.5 dwelling units per acre or employment density of 10 jobs per acre, as measured over an area of 25 acres, should be provided with a transit service that places 90% of residences and jobs within one half mile of a bus stop. Omnitrans Short Range Transit Plan indicated that all neighborhoods and employment nodes in Upland are well served. Closer analysis of Upland's development patterns in the 2013-2018 A.I. revealed a then-underserved area and that same review was taken into consideration on addressing this impediment in the 2019-2023 plan. At that time, Omnitrans did not have bus routes connecting to the Colonies Crossroads commercial development within the Colonies San Antonio Specific Plan area, more specifically the commercial area that includes the Home Depot, LA Fitness, Nordstrom Rack, etc., to the rest of the city.

As of June 2023, Omnitrans operates three bus routes in the City of Upland. they are:

- Route 83 – Route 83 serves Upland and Chino via Euclid. Bus service frequency is every 60 minutes Monday through Sunday.
- Route 84 – Route 84 serves Chino, Montclair, Rancho Cucamonga and Upland. Route 84 is direct north-south service on Mountain Avenue connecting Chino, Ontario, and Upland. Bus service frequency is every 60 minutes Monday through Sunday.
- Route 85 - Route 85 provides service between Chino Transit Center, Montclair, Upland, and Chaffey College in Rancho Cucamonga. Bus service frequency is every 60 minutes Monday through Sunday.

Recommendation:

During the 2019-2023 planning period, the City will monitor any residential and commercial developments north of the 210 Freeway that may impact ridership potential for expanded fixed route service north of the 210 Freeway. If any new developments in this area have the potential to generate ridership, share this information with Omnitrans for consideration in the future transit planning.

Impediment No. 2 - Discrimination against Persons with Disabilities

Consistent with findings in the 2013-2018 A.I., two-thirds of the discrimination complaints in Upland over the last five years were attributed to a physical or mental disability. In total, there were 138 fair housing complaints surfaced through the work of Inland Fair Housing and Mediation Board in Upland over the last five years, with 104 (two-thirds) of discrimination reported attributed to a physical or mental disability. Table VI-1 illustrates the number of disability discrimination cases over the five-year period of study.

**Table VI-1
Fair Housing Discrimination Cases in Upland**

Basis	2013-2014	2014-2015	2015-2016	2016-2017	2017-2018	2018-2019	Total
Number of Disability Discrimination Cases	15	23	17	21	16	12	104

The high proportion of disability complaints to IFHMB in Upland is consistent with other communities in the area and is also consistent with data at the state and federal level. Fair housing discrimination on the basis of disability demonstrates a lack of understanding in the housing industry of the housing rights of persons with disabilities. Disabled persons are particularly experiencing difficulties when requesting reasonable accommodations or modifications from their housing providers. In particular, persons with cognitive disabilities experience significantly more problems with these accommodations.

2018 status: This impediment was addressed during the 2013-2018 planning period through fair housing outreach and education; however, given that two-thirds of all fair housing complaints received locally are on the basis of disability, this impediment is considered to have been addressed but remains a priority and will continue to be addressed in the new planning period.

Recommendations:

The Upland Development Services Department and IFHMB should continue providing educational opportunities for property owners, property managers, and residents in Upland to provide information concerning the law as it pertains to reasonable accommodations and reasonable modifications. This may be addressed through workshops, public services announcements, literature distribution and the provision of landlord-tenant mediation services. To that end, it is recommended that the City contract with IFHMB to provide two (2) workshops per year for the next five (5) years in the City, with one (1) workshop per year serving as a general introduction to fair housing laws and possible discrimination, and one (1) workshop each year being specifically focused on housing issues faced by persons with disabilities and on the reasonable accommodation and modification process. As matched pair testing, conducted in accordance with federal standards, is the most effective way of determining if discrimination is occurring, it is also recommended that the City contract with IFHMB at least once during the planning period to fund matched pair testing in Upland to address issues of possible discrimination based on disability as well as race, familial status, national origin, disability and other protected categories.

The number of fair housing cases have increased, 277 disability complaints while the disability cases have decreased, 87 disability cases from the 2013-2018 study. Table VI-2 illustrates the number of disability cases from 2019-2023.

**Table VI-2
Fair Housing Discrimination Cases in Upland**

Basis	2019-20	2020-21	2021-22	2022-23	Total
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Number of Disability Discrimination Cases	15	35	15	22	87
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Inland Fair Housing Mediation Board (IFHMB) held virtual workshops available to Upland residents during FY 2022-23. The global pandemic impacted the agency’s operations and continues to solely operate virtually. Brochures and educational pamphlets were disseminated and posted when available to the public and emails communicated to City staff were passed along to partnering community-based organizations.

Impediment No. 3 - Lack of Rental Housing Opportunities in Northern Upland

Examination of the General Plan Land Use Map and Zoning Map updates from 2015 and comparison to Affirmatively Furthering Fair Housing Data and Mapping Tool (AFFH-T) maps from 2017 illustrating the tenure of occupied housing units geographically reveals that tenure is consistent with land use and zoning in Upland. In the Census Tracts north of Foothill Boulevard, between 68.4 and 81.43 percent and 100 percent of housing units are owner occupied. South of Foothill Boulevard, only 33.51 percent of the housing units are owner-occupied in most Census Tracts.

Recommendation:

HUD Affirmatively Furthering Fair Housing (AFFH) data suggests that northern Upland is characterized by higher performing schools and relatively less exposure to poverty. To foster and increase a balanced community that provides access to a diverse array of housing opportunities for all Upland residents including members of protected classes, consider addressing the lack of affordable rental housing opportunities north of Foothill Boulevard by exploring ways to incorporate multi-family affordable rental housing developments as part of infill projects or as part of Specific Plans where mixed use and flexible residential uses are currently allowable.

To encourage the construction of Accessory Dwelling Unit (ADU) program, the Planning Division hosted an in-person workshop to all Upland homeowners interested in learning about the development process of ADUs on April 13, 2023 and followed up with a webinar on April 27, 2023. ADUs are seen as an affordable type of home to construct in California because they do not require paying for land, major new infrastructure structured parking or elevators.

The recommendations included in Table VI-2 outline the City’s action plan to eliminate the three current impediments to fair housing choice identified above. The recommendations include a designated agency or agencies that should be involved in the implementation of a particular recommendation, as well as a target date for completion or implementation.

**Table VI-2
Fair Housing Plan Recommendations**

Impediment	Recommendations	Lead Agency	Timeframe
1. Transit Access	During the 2019-2023 planning period, monitor any residential and commercial developments north of the 210 Freeway that may impact ridership potential for expanded fixed route service north of the 210 Freeway. If any new developments in this area have the potential to generate ridership, share this information with Omnitrans for consideration in future transit planning.	Development Services Department	January 2019- June 2023
2. Discrimination against Persons with Disabilities	The Upland Development Services Department and IFHMB should continue providing educational opportunities for property owners, property managers, and residents in Upland to provide information concerning the law as it pertains to reasonable accommodations and reasonable modifications. It is recommended that the City contract with IFHMB to provide two (2) workshops per year for the next five (5) years in the City, with one (1) workshop per year serving as a general introduction to fair housing laws and possible discrimination, and one (1) workshop each year being specifically focused on housing issues faced by persons with disabilities and on the reasonable accommodation and modification process. It is also recommended that the City contract with IFHMB at least once during the planning period to fund matched pair testing in Upland to address issues of possible discrimination based on disability as well as race, familial status, national origin, disability and other protected categories.	Development Services Department and IFHMB	Ongoing
3. Lack of Rental Housing Opportunities in Northern Upland	HUD Affirmatively Furthering Fair Housing (AFFH) data suggests that northern Upland is characterized by higher performing schools and relatively less exposure to poverty. To foster and increase a balanced community that provides access to a diverse array of housing opportunities for all Upland residents including members of protected classes, consider addressing the lack of affordable rental housing opportunities north of Foothill Boulevard by exploring ways to incorporate multi-family affordable rental housing developments as part of infill projects or as part of Specific Plans where mixed use and flexible residential uses are currently allowable.	Development Services Department	June 2020

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 of Upland's Development Services Department is responsible for the administration of its CDBG program. Its primary mission is to ensure that its subrecipients comply with all applicable regulations governing the administrative, financial, and programmatic operations of the CDBG Program and that the city achieves its performance objectives.

To aid in this process the City has established a monitoring process that emphasizes positive feedback to feedback to subrecipients about what they have done well, in addition to identifying areas for improvement. The City's monitoring process consists of four components: 1) Procurement Process; 2) Contract Management; 3) Monitoring Compliance; 4) Audit Review.

Procurement Process

The city receives a new allocation of CDBG funding each year. To plan for the use of these funds, the City implements and Notice of Funding Opportunity (NOFO) or application process to secure experienced subrecipients who can assist the City in meeting their Consolidated Plan goals and objectives. Availability of the city's CDBG application is announced in a paper of general circulation and the CDBG application is made available to all on the City's website. New subrecipients are provided training by staff where they learn about the federal regulations and required reporting and City contracting requirements.

Contract Management

Each CDBG subrecipient is issued either a CDBG agreement or Memorandum of Understanding (MOU). Each document includes the federal terms, conditions and attachments that cover the purpose, location, income eligibility guidelines, eligibility of the activity, budget, the scope of work/services, performance standards, required activity reports, and any additional requirements. Throughout the term of the CDBG agreement or MOU, Housing Division staff is responsible for contract compliance and project management. Ongoing technical assistance is provided by the Housing Division staff throughout the contract period and takes effective corrective and remedial actions toward subrecipients who do not comply.

Sub-Recipient Monitoring

Monitoring is an effective method of ensuring compliance with the federal requirements and the terms and conditions of the written agreement or MOU. The monitoring process involves desk audits of reports and supporting documentation, risk assessments, on-site monitoring reviews, frequent telephone contacts, written communications, and meetings. Through regular monitoring of its subrecipients, staff ensures they abide by all applicable federal, state and local standards and work with subrecipients to increase efficiencies and augment their performance.

As part of this process, City staff watches for the potential of fraud, waste, mismanagement, and/or other opportunities for potential abuse. Contract provisions are in place that provide for the suspension of funds, termination of the contract, and disallowance of reimbursement requests at any time during the program year based on performance deficiencies. On an individual basis, staff works with sub-recipients to correct identified deficiencies through discussion and/or technical assistance, prior to imposing any sanctions.

Audit Review

As part of the year-end requirements, sub-recipients were required to submit fiscal reports based on contract terms. Governmental units and non-profit organizations expending more than \$750,000 in federal funds during FY 2021-22 were required to submit a copy of a Single Audit to the City to adhere to OMB Circular A-133 requirements. A Single Audit was required to be submitted for desk review by the CDBG program, regardless of whether there were findings noted in the audit pertaining to CDBG funds, since it served as an additional monitoring tool used to evaluate the fiscal accountability of sub-recipients. As part of the closeout process, subrecipients expending FY 2021-22 CDBG funds were required to submit an Audited Financial Statement for desk review, if submission of a Single Audit was not applicable.

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 City is committed to providing its citizens with reasonable notice and opportunity to comment on its HUD plans and performance reports. In accordance with the City's Citizen Participation Plan, the CAPER was made available for public viewing at the following locations:

- City Clerk Office, 460 N. Euclid Ave, Upland, CA, 91786, (909) 931-4120
- Upland Public Library, 450 Euclid Ave, Upland, CA 91786, (909) 931-4200
- Development Services Dept. 460 N. Euclid Ave, Upland, CA, 91786, (909) 931-4300
- City's Website: www.UplandCa.gov

In addition, a public notice was published in the Inland Valley Daily Bulletin in English and in Spanish on September 1, 2023, notifying the public of the availability of the Consolidated Annual Performance and Evaluation Report (CAPER) for a 15-day public review and comment period. A copy of the public notice is included in Attachment Section-Public Notice and a summary of any written or oral comments received during the 15-day public comment period are included in Attachment Section-Public Notice.

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.

The City made progress toward its five-year and one-year goals for this reporting period and did not change its program objectives or the projects and activities that utilized CDBG funds.

CDBG and CDBG-CV funded activities contributed significantly to the City's progress toward meeting the high priority needs identified in the Consolidated Plan. As shown in Table 1 of this document, CDBG funds are contributing to all eight Strategic Plan goals.

The City of Upland approved substantial amendment, Community Development Block Grant CARES (CDBG-CV) Program to its FY 2020-2024 Consolidated Plan. Annual Action Plans will be impacted through June 30, 2026.

The City and its subrecipients continue to work toward effective programming that generates safe and effective results for its residents.

With the advancements of technology and work functions that allow for remote accessibility, the city and its CBOs are able to deliver services that are well needed for its residents.

This continuation of upgrading through the “new norm” is anticipated to continue through the next several annual action plans as the global COVID-19 pandemic continues to be addressed.

The City’s residents faced new challenges during the COVID-19 pandemic including job loss, food insecurity, housing insecurity, and disruption to normal in-person public services.

City staff adapted to a its work environment and continued delivering high quality services to residents throughout the duration of the stay-at-home orders.

Nonprofit subrecipients and City Departments altered their program delivery models to promote social distancing while continuing to provide essential services to low- and moderate-income residents.

There were some activities that were not able to convert to a socially distanced delivery model, the after-school classroom enrichment activity, and nearly all of the capital improvement projects that would require construction workers in close proximity to one another causing a program not to continue or delays in construction.

The city has plans in place with each implementing agency to ensure these capital improvement projects and its CDBG subrecipients programs are completed.

The addition of \$873,743 of CDBG-CV funds fueled a significant increase in the City’s capacity to address the challenges our residents faced. HUD’s decision to allocate these funds on top of the regular entitlement grant programs this year allowed the Housing Division to develop additional systems and integrate new procedures into the service delivery model to better address the needs of low- and moderate-income residents.

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.