



2019-2020

CDBG Consolidated Annual Performance and Evaluation Report

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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)

The 2019-20 program year constitutes the City of Lodi's first year implementing the 2019-23 Community Development Block Grant (CDBG) Consolidated Plan, as amended on January 15, 2020. During this program year, CDBG-funded projects and programs were executed within the City with the intention of achieving the goals outlined in the Strategic Plan section of the Consolidated Plan. These projects and programs were carried out by City staff, contractors, and subrecipients of CDBG funds.

This year's activities resulted in addressing seven of the ten goals outlined in the Strategic Plan section of the 2019-23 Consolidated Plan. The goals addressed during the program year are as follows:

- Goal #1: Promote Safer Neighborhoods
- Goal #2: Improve Community Parks and Green Space in CDBG target area
- Goal #3: Infrastructure and Facility Improvements
- Goal #5: Build Capacity in CDBG Target Area
- Goal #6: Support Public Service Programs for Priority Populations
- Goal #7: Affirmatively Further Fair Housing
- Goal #10: Create and Promote Housing for Homeless Populations

While the City's efforts during the 2019-20 program year did not target Strategic Plan goals 4, 8 or 9 (Goal #4 - Increase and Maintain Supply of Affordable Housing, Goal #8 - Improve Housing Affordability, or Goal #9 - Support Programs and Projects that Reduce and Prevent Homelessness), the City intends to address these goals in future program years during the 2019-23 Consolidated Plan program period.

Please see the following summary of the City's 2019-20 CDBG-funded activities and how they aligned with the priority needs and goals identified in the 2019-23 Consolidated Plan:

Priority Need – Safer Neighborhoods and More Resident Pride

Goal #1 – Promote Safer Neighborhoods

Graffiti Abatement Program

The City's **Graffiti Abatement** program has helped reduce blight by cleaning up tagged properties in the low-income CDBG target areas. The City's program cleans up these sites within a day or two, or on the same day in some instances, which benefits not only the property but prevents secondary tags. The program runs year-round and has helped preserve neighborhood property values and maintain housing stock in the City. The Graffiti Abatement program removed 1,492 instances of graffiti in the CDBG target area throughout the program year, benefitting the approximately 18,000 individuals living in the CDBG target area.

Priority Need – Improvements to Community Parks and Green Spaces

Goal #2 – Improve Community Parks and Green Space

Blakely Park Restroom Improvements Project

The **Blakely Park Restroom Improvements** project consisted of the construction of a new restroom facility at Blakely Park, which is located in the City's CDBG target area. The work included construction of the restroom facility, including improvements compliant with Americans with Disabilities Act (ADA) accessibility requirements. This project is anticipated to benefit approximately 31,660 individuals living in the surrounding neighborhoods.

Priority Need – Improvements to Infrastructure and Facilities Access

Goal #3 – Infrastructure and Facility Improvements

Salvation Army: HVAC and Refrigerator Repairs

The Hope Harbor Shelter, which is operated by the **Salvation Army**, needed repairs to the heating, ventilation, and air conditioning system (HVAC) to accommodate the shelter's beneficiaries over the summer and winter months. In addition, the refrigerator at the Lodi Corps facility, used for food storage for donated meals, needed repairs. During the program year, this project experienced multiple delays in its execution due to changes in staff at the Salvation Army as well as due to the COVID-19 pandemic. As of June 30, 2020, this project has repaired two HVAC units,

with the remaining repairs anticipated to be completed by December 2020. Upon completion, this project is estimated to serve approximately 5,410 individuals.

Priority Need– More Local Leaders

Goal #5 – Build Capacity in CDBG Target Area

ABCD (Asset Based Community Development): Love Your Block program

The **ABCD: Love Your Block** program continued to build capacity and leadership in its lower-income neighborhoods during the 2019-20 CDBG program year. During the 2019-20 period, the City partnered with the Lodi Chamber of Commerce to facilitate cycle three of the ABCD: Love Your Block program. This program creates opportunities for residents to learn how to lead their own mini community-improvement projects from the initial planning, through implementation, and finally to evaluation phase after the project is completed. Residents attended a series of workshops and received one-on-one project mentoring where they were encouraged to use their talents to implement the activities. They learned to write grants, identify community assets, build a network of resources, create marketing material, manage their projects, and review their project impacts. In February 2020, ABCD held a year-end celebration to acknowledge the accomplishments of the program participants and their projects. Due to the Covid-19 pandemic, the start of the fourth cycle was put on hold, and staff anticipates the program beginning again in fall. Nonetheless, Block by block, this program has a ripple effect that slowly builds a safer and healthier community.

Priority Need – Services for very low-income adults, seniors, disabled (priority populations)

Goal #6 – Support Public Service Programs for Priority Populations

LOEL Center: Meals on Wheels Program

The **LOEL Senior Center** served 95 seniors, thus completing 95 percent of its anticipated accomplishments (LOEL had projected serving 100 unduplicated seniors). This meal program provides a hot nutritious meal five days a week to homebound seniors; all 95 recipients reported being disabled in some way. The recipient receives daily nutrition, socialization, and a welfare checkup to make sure they are well enough to answer the door.

Second Harvest Food Bank: Food Assistance Program

The **Second Harvest Food Bank** exceeded its goal to serve 2,000 persons and instead served a total of 2,795 unduplicated individuals and their family members with food through Second Harvest's program. Additionally, many families visited the food bank and its nonprofit partners repeatedly throughout the year. Second Harvest served 2,795 new and 31,926 returning participants, ultimately serving 550,873 pounds of supplemental food in the City of Lodi. This food distribution is accomplished through a three-part program, which provides 1) food to low-income families; 2) groceries to youth who participate in Boys and Girls Club; and 3) supplemental groceries for seniors at the Lodi Community Center. During the fourth quarter, in response to COVID-19, Second Harvest Food Bank modified operations to adapt to social distancing requirements.

Salvation Army: Hope Harbor Shelter

In the 2019-20 program year, the Salvation Army used CDBG funds to operate the **Hope Harbor Shelter Operations Support Program**, offering overnight emergency shelter and a morning meal to homeless individuals. Hope Harbor served a total of 976 unduplicated individuals over the program year, exceeding the goal of 709 individuals. Hope Harbor also provided services such as referrals, case management, and access to other supportive service organizations to homeless individuals staying at the shelter.

Community Partnership for Families: Family Resource Center and Youth Program

The **Community Partnership for Families** provided services through the Family Resource Center and Youth Program. These services were aimed at addressing youth financial self-sufficiency, employment, gang involvement, academic struggles, mental health issues, substance abuse issues, and more. During the 2019-20 program year, the partnership exceeded the number of projected individuals (85) served by providing 151 unduplicated individuals with intake assessments and mentoring activities and events.

California Human Development: Immigration Expansion Program

California Human Development provided direct immigration services to individuals through consultations and application processing in an effort to determine their legal rights and possible options for obtaining a path to U.S. citizenship. California Human Development served a total of 101 individuals with immigration and consultation services, which amounts to 72 percent of its anticipated accomplishments. Additionally, it held a Citizenship Celebration Day in September 2019 which had approximately 50 individuals in attendance. This event gave individuals a platform to share their experiences in becoming a U.S. citizen and also worked as an opportunity for California Human Development to reach out to more community members that could benefit from immigration services. Unfortunately, the COVID-19 pandemic negatively affected California Human Development's ability to deliver services in the third and fourth quarters, which explains the inability to meet its anticipated annual goal.

Priority Need – Support Fair Housing Services

Goal #7 – Affirmatively Further Fair Housing

Fair Housing – San Joaquin Fair Housing

San Joaquin Fair Housing (SJFH) provided fair housing assistance, including education, counseling, and mediation services, to the residents of San Joaquin County. SJFH assisted 538 Lodi households in the 2019-20 program year, exceeding its projected total number of households by 54 percent. The program goals are to ensure fair housing, and to teach and advocate tenant and landlord rights and responsibilities regarding providing and maintaining adequate and safe housing. SJFH helped mediate conflicts between tenants and landlords and provided educational opportunities. By educating both tenants and landlords, the program worked to assist in the process of mitigating housing discrimination in Lodi and promoting fair housing opportunities regardless of a person’s disability, religion, race/ethnicity, color, country of origin or ancestry, age, sex, gender identification/expression, familial status, source of income, marital status, or sexual orientation.

Fair Housing – California Rural Legal Assistance

California Rural Legal Assistance (CRLA) conducted fair housing testing and recommended actions to prevent discrimination. During the 2019-20 program year, CRLA provided fair housing testing services for the City to ensure quality, systematic, and complete review of how residents may be experiencing discrimination in their housing choice. CRLA conducted six tests of the five anticipated. Two tests showed unfair treatment based on national origin. CRLA was not able to conduct follow up Fair Housing outreach at this location due to the COVID-19 Pandemic and County/State-wide stay-at-home orders. CRLA will continue to monitor this housing complex for future testing and fair housing outreach. CRLA conducted two housing complex surveys, exceeding the requirement of surveying one complex. CRLA did not find any unfair treatment at either of these housing complexes, but provided fair housing outreach at both sites.

Priority Need – Create Housing for Homeless and At-Risk Homeless

Goal #10 – Create and Promote Housing for Homeless Populations

HEAP Grant: Tiny Homes Project

2019-20 CDBG funds were originally awarded to fund land acquisition for the **HEAP: Tiny Homes Project**. Due to the administrative burden associated with allocating CDBG funds to this project, City staff decided that it would be more cost-effective to not use CDBG funds for this activity. Though this CDBG activity was canceled, the Tiny Homes project still saw progress in the 2019-20 program year. Twenty sites were

vetted as potential project locations, from which, two sites were selected for environmental assessments. Assessments were completed on both sites; however, both contained noise levels that exceeded allowable limits. City staff is working to find mitigation measures and considering alternative sites. Once complete, the project will receive tenant referrals from local organizations including Salvation Army, Lodi House, and Women’s Center, although more agencies may be added.

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)

Project/Activity	Agency/Operator	Strategic Plan Goal	Estimated Funding	Indicator	Unit of Measure	Goal 5 yr Plan	Act. 5 yr Plan	% Comp.	2019 Goal	2019 Actual	% Comp.
Planning and Administration	City Staff and Contractors	Efficient Administration and Oversight	\$102,444	Successfully administered the CDBG program according to HUD regulations	Efficient Administration				NA	NA	100%
Promote Safer Neighborhood						18,000	18,000	18,000	18,000	18,000	100%
Graffiti Abatement	City Staff and Contractors	Promote Safer Neighborhood	\$29,706	Public facility or infrastructure activities other than Low/Moderate Income Housing Benefit	Persons Assisted						
Improve Community Parks and Green Space in CDBG Target Area						45,000	31,600	70%	31,660	0	75%
Blakely Restroom Project	City staff and Contractors	Improve Community Parks and Green Space in CDBG target area	\$270,498	Public facility or infrastructure activities other than Low/Moderate Income Housing Benefit	Infrastructure Project				31,660	0	0%
Infrastructure and Facility Improvements						50,000	5,410	11%	5,410	75%	75%

Salvation Army: HVAC and Refrigerator Repairs	Salvation Army	Infrastructure and Facility Improvements	\$47,297	Public facility or infrastructure activities other than Low/Moderate Income Housing Benefit	Infrastructure Project				5,410	0	0%
Support Public Service Programs for Priority Populations						5,000	4,118	82%	3,384	4,118	122%
Meals on Wheels	LOEL Senior Center	Support Public Service Programs for Priority Populations	\$7,433	Public Services other than Low/Mod Housing Benefit	Persons Assisted				100	95	95%
Food Bank	Second Harvest	Support Public Service Programs for Priority Populations	\$8,923	Public Services other than Low/Mod Housing Benefit	Persons Assisted				2,000	2,795	140%
Hope Harbor Shelter	Salvation Army	Support Public Service Programs for Priority Populations	\$11,902	Public Services other than Low/Mod Housing Benefit	Persons Assisted				709	976	137%
Family Resource Center & Youth Programs	Community Partnership for Families	Support Public Service Programs for Priority Populations	\$27,765	Public Services other than Low/Mod Housing Benefit	Persons Assisted				85	151	177%
Immigration Expansion Program	California Human Development	Support Public Service Programs for Priority Populations	\$7,967	Public Services other than Low/Mod Housing Benefit	Persons Assisted				140	101	72%
Affirmatively Furthering Fair Housing						750	538	72%	350	538	
San Joaquin Fair Housing (SJFH)	San Joaquin Fair Housing (SJFH)	Affirmatively Furthering Fair Housing	\$12,976	Public service activities for Low/Moderate	Persons Assisted				350	538	153%

				Income Housing Benefit							
Fair Housing Testing Program	California Rural Legal Assistance (CRLA)	Preserve Existing Affordable Housing	\$7,091	Public service activities for Low/Moderate Income Housing Benefit	Fair Housing Tests						
Create and Promote Housing for Homelessness						10 housing units			10 housing units	N/A	
Lodi Tiny Homes Project	City Staff and Contractors	Create and Promote Housing for Homelessness	\$0	Low/Moderate Income Housing Benefit	Public Facilities project and Public Improvements				Canceled	N/A	N/A

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

The City’s 2019-23 Consolidated Plan identifies eleven priorities and ten main goals that align with these priorities. As discussed above, this year’s program activities resulted in meeting seven of the ten main goals, which work to support the priority needs identified. To demonstrate, a list of each goal and the activity that supported each goal is outlined below:

- Goal #1: Promote Safer Neighborhoods
- Goal #2: Improve Community Parks and Green Space in CDBG target area
- Goal #3: Infrastructure and Facility Improvements
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Goal #1: Promote Safer Neighborhoods

- Lodi’s Graffiti Abatement program cleaned up graffiti throughout the City, particularly focusing on areas within the CDBG target area, and helped to prevent future occurrences of vandalism. This year’s program met its goal by removing graffiti throughout the City that promoted gang activity, profanity, desecration of public and private facilities, and language that promoted racism and intolerance toward different groups of people.

Goal #2: Improve Community Parks and Green Space

- The Blakely Park Restroom Improvement project started construction in the 2019-20 program year; however, the project was not completed until early September 2020. This project was aimed at serving the CDBG target area populations in the surrounding neighborhoods by constructing a new restroom building, inclusive of ADA improvements, to serve park patrons.

Goal #3: Infrastructure and Facility Improvements

- The Salvation Army rehabilitation projects supported the Salvation Army’s ability to serve the City’s homeless individuals and those at risk of becoming homeless. The CDBG allocation supported two rehabilitation projects: replacing the HVAC system at the Hope Harbor Shelter and repairing the refrigeration unit used for food storage at the Lodi Corps facility. The Hope Harbor Shelter provides 709 beds for those seeking emergency shelter, and the air conditioning repairs help create a safe environment for individuals staying at the shelter during the winter and summer months. The Lodi Corps Facility provides meals

to approximately 4,701 individuals. The repairs to the refrigeration unit ensured the Lodi Corp was able to store and distribute approximately 250 food boxes per week.

Goal #5: Build Capacity in CDBG Target Area

- The ABCD: Love Your Block program participants completed two community improvement projects, with a third delayed due to the COVID-19 pandemic. The projects included financial literacy training for youth and a school supplies/parenting support event.

Goal #6: Support Public Service Programs for Priority Populations

- LOEL Serves Meals on Wheels program nearly met its goal of providing 100 seniors with health-food classes and healthy food alternatives by serving a total of 95 individuals.
- Second Harvest Food Bank provides residents with access to food resources and often partners with nonprofits to supplement its services with additional nutrition education and food. It exceeded its goal by increasing the number of Lodi agencies served and increasing the amount of food provided to each agency.
- The Community Partnership for Families program exceeded its goals as well. Youth workshops are offered with an open invitation for youth to bring friends, which resulted in a much larger number of youth than anticipated. These programs screen for and identify different needs for youth participants, along with the needs of that individual's family. The individual and their family are then connected with additional services; this prioritizes an approach that focuses on the family's role in the success of the youth's development. Youth participants are encouraged to develop a plan to take ownership of their family's circumstances and to develop their own plan as to how these circumstances could change. With their goals and the support of the agency staff, youth and family members work toward getting the assistance they need.

Goal #7: Affirmatively Further Fair Housing

- CRLA worked to prevent housing discrimination through six audit-based tests, complaint-based testing on an as-needed basis, one tenant survey, and a report with recommended follow-up activities for the prevention of housing discrimination.
- SJFH provided social services through fair housing testing, fair housing counseling, a housing discrimination and tenant/landlord law hotline, complaint investigation, two landlord/tenant seminars, and outreach and education at community events.

Goal #10: Create and Promote Housing for Homeless Populations

- As mentioned above, CDBG funds were not used to fund this activity in the 2019-20 program year; however, the Tiny Homes Project still made progress in its completion during the 2019-20 program year by vetting site locations, completing two environmental assessments, engaging in public discourse for site selection, preparing preliminary site lay-out plans, updating project schedule and budget, and drafting agreement with program operator.

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	2,092
Black or African American	187
Asian	93
American Indian or American Native	26
Native Hawaiian or Other Pacific Islander	20
American Indian or American Native and White	4
Asian and White	6
Black or African American and White	22
American Indian or American Native and Black/African American	3
Other Multi-Racial	1,495
Total	3,948
Hispanic	1,018
Not Hispanic	2,930

Table 1 – Table of assistance to racial and ethnic populations by source of funds

Narrative

Lodi's CDBG-funded activities serve residents of many races and ethnicities within Lodi. The table below compares the percentage served under Lodi's 2019-20 CDBG public service programs versus the 2016 5-year American Community Survey (ACS) statistics, which provides demographic data for the entire City of Lodi. Projects that benefit a public area are not required to collect specific race/ethnicity data and are not included here in the table.

	2019 CDBG Actual	2019 CDBG Actual % of total	2016 ACS Data	2016 % of Total
White	2,092	53.0%	40,616	62.5%
Black or African American	187	4.7%	1,197	1.8%
Asian	93	2.4%	347	0.5%
American Indian or American Native	26	0.7%	6,118	9.4%
Native Hawaiian or Other Pacific Islander	20	0.5%	401	0.6%

More than One Race	1,530	38.8%	10,099	15.5%
Other	0	0%	6,228	0%
Total	3,948	100%	65,006	100%
Hispanic	1,018	26%	24,273	37.3%
Not Hispanic	2,930	74%	40,733	62.7%

In the 2019-2020 program year, Hispanic individuals continue to represent nearly a third of those served by CDBG-funded public services in the City of Lodi. In the previous program year, recipients that identified as Hispanic represented over a third of those receiving public services (32.5 percent). These numbers are representative of the percent of Hispanics in the community, and the CDBG target population. Demographic data from the 2016 ACS shows that 37.3 percent of the City’s residents are Hispanic, whereas 62.7 percent of the population is not Hispanic. The table also shows that recipients that identified as Hispanic received approximately 26% of services in the 2019-20 program year, whereas individuals that identified as non-Hispanic received approximately 74 percent of services.

CR-15 - Resources and Investments 91.520(a) CR-15 - Resources and Investments 91.520(a)

Identify the resources made available

Source of Funds	2019-2020 Funds	Resources Made Available	Estimated Amount Expended During Program Year
CDBG	\$624,641	\$624,641	\$416,162.68

Table 2 – Resources Made Available

Narrative

During the 2019-20 program year, an estimated \$416,162.68 in CDBG funds was expended across all projects. Please refer to the appendix at the end of this report for a detailed financial summary report for the 2019-20 CDBG program year (To be included with final CAPER).

Identify the geographic distribution and location of investments

Target Area	Planned Percentage of Allocation	Actual Percentage of Allocation	Narrative Description
CDBG Target Area	86%	81%	Incomplete projects - HEAP: Tiny Homes, Salvation Army repairs, and Blakely Restroom projects did not complete and spend down all funds before the end of the program year, which offset the anticipated geographic distribution. These projects will be completed by the end of 2020.
City-Wide Activity	14%	19%	All projects were completed. A higher percentage of investments is represented here due to the decrease in funds expended in the CDBG target area.

Table 3 – Identify the geographic distribution and location of investments

Narrative

While Lodi has used a needs-based strategy to select projects and activities, the greatest need has historically been identified to be within the low-income CDBG target area. When possible, specific attention will be focused on one census tract (45.02) in the target area that was identified as a Racially Concentrated Area of Poverty (RCAP) and an Economically Concentrated Area of Poverty (ECAP). While in previous years projects have targeted this RCAP/ECAP area, none of this year’s proposed projects are located in that specific census tract.

The social projects serve at least 70 percent low- to moderate-income persons. Most social service organizations offer their services citywide. Due to Lodi’s concentrated low-moderate income area, it is believed that the majority of recipients reside in the CDBG target area; however, for purposes of this calculation, the projects are considered citywide activity and are not included in the CDBG target area.

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.

Federal funds require additional regulation, labor compliance standards, and administration that can add a significant cost burden to a new capital improvement project. For new construction and large-scale rehabilitation of affordable housing, the City prefers to pursue funding that does not significantly increase the building cost, unless there are sufficient federal funds to benefit the project's bottom line. The CDBG allocation to the City does not add sufficient value to offset the increased costs for most of the City's affordable housing development efforts. Therefore, the City focuses CDBG funding either on projects that are already burdened with the federal reporting requirements or on projects where there is no other viable funding source and the project can be funded entirely with CDBG funding.

With respect to public service projects funded with CDBG funds, many of Lodi's social service subrecipients have additional resources to support their CDBG-funded programs. These additional resources include not only other grant funds, but in-kind volunteers and donations. To best leverage the City's available resources, the City will continue to look for opportunities to layer private and non-federal resources with federal resources and to require that CDBG subrecipients demonstrate sufficient committed non-CDBG funding, so that projects and services will have the best results for the community and the low- and very low-income residents they are intended to serve. Additionally, SJFH receives CDBG funding from all of the other jurisdictions in San Joaquin County.

The construction projects that used CDBG funds during the 2019-20 program year were the Blakely Park Restroom Improvements Project and the Salvation Army: HVAC and Refrigerator Repairs project. Both projects were completed solely using 2019-20 CDBG funds and did not leverage funds from other sources.

Though the CDBG program does not have a matching requirement, the City of Lodi considers match funds as a factor in determining recommended actions while evaluating the subrecipient applications and project proposals submitted to the City for CDBG funding.

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	603	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	603	0

Table 4- 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	5	0
Number of households supported through the rehab of existing units	598 (Staff is verifying this number)	0
Number of households supported through the acquisition of existing units	0	0
Total	603	0

Table 5 - Number of Households Supported

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

The City has prioritized supporting projects and programs that address affordable housing in the 2019–23 Consolidated Plan. This prioritization is an effort to capture HUD’s initiative for implementing affordable housing programs, while also providing realistic and crucial support to individuals and families who struggle to maintain housing due to various cost burdens and financial disadvantages. Often times, when implementing the projects associated with supporting affordable housing, delays and changes in planning do occur.

The City had originally funded the Salvation Army HVAC and Refrigerator Repairs project, which was meant to be completed before the end of the 2019-20 program year. Unfortunately, this project was delayed and was unable to be completed by the end of the program year. This has resulted in the 598 anticipated households not being represented as accomplishments under the “Number of households supported through the rehab of existing units” category above.

The City continuously works to streamline project management, and part of that process includes identifying projects that are not ready for funding or not a good fit for CDBG. In the 2019-20 program year, the City had originally allocated CDBG funds to assist in the acquisition of land for the HEAP: Tiny

Homes project. After further analysis of CDBG guidelines and tying CDBG dollars to the project, it was determined that it would be more cost-effective to not allocate CDBG funds to the project in an effort to reduce excessive administrative burden associated with CDBG federal requirements. This project was originally meant to account for five of the households identified under the “Number of households supported through the production of new units” category in the table above; however, because CDBG funds were not used for this project, we were unable to obtain those accomplishments for the 2019-20 program year.

Another instance of a difference between the City’s goal and the actual outcome can be explained through the CDBG-funded Housing Repair program. The City allocated 2016-17 CDBG program funds to a housing rehabilitation program which has continuously been delayed. This program was scheduled to be completed, once again, in the 2019-20 program year; however, after continued staff capacity changes and the recent COVID-19 pandemic, the housing rehabilitation program is now planned to be completed before the end of the 2020-21 program year.

Discuss how these outcomes will impact future annual action plans.

The City plans to address housing needs, but without significant additional resources, the City will continue to focus CDBG dollars where they will do the most good for low- and moderate-income households through better access to economic opportunities, services, and public infrastructure.

In the 2019-20 program year, the City took actions to mitigate the negative effects of problems faced when administering the CDBG program, as mentioned in the paragraphs above. The substantial amendments and reallocations of funds from canceled or problematic projects allowed projects with more appropriate timing to move forward, while carefully determining that other projects were not ready to be administered.

Moreover, of the projects mentioned above, the Salvation Army Repairs project, Housing Rehabilitation project, and much of the HEAP: Tiny Homes project are scheduled to be completed by the end of the 2020-21 program year.

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 Persons Served	CDBG Actual	% of Actual
Extremely Low-income	3,269	83%
Low-income	330	8%
Moderate	180	5%
Above Moderate-income	169	4%
Total	3,948	100%

Table 6 – Number of Persons Served by Income

Narrative Information

As per HUD requirements, Lodi tries to focus CDBG funding toward low- and moderate-income households and neighborhoods. A total of 3,948 persons were served by CDBG-funded public service and fair housing programs. Of those, 3,269, or 83 percent, were extremely low income, or earned less than 30 percent of the HUD Adjusted Median Family Income (HAMFI) for San Joaquin County; 330 of those individuals, or 8 percent, were low income or earned less than 50 percent of HAMFI; 5 percent, or 180, reported having a moderate income, meaning that they earned less than 80 percent of HAMFI; and 169, or 4 percent, of those served were over the low-moderate income level. The City used an area benefit to determine population demographics for the public infrastructure projects that were intended to benefit low-income neighborhoods. For example, the Graffiti Abatement program served neighborhoods that were approximately 55 percent low-income and the Blakely Park Restroom Improvement project served neighborhoods with approximately 57 percent low-income individuals.

The City does not have sufficient funds to construct new affordable housing units. In such a climate, the City looks for alternative ways to support affordable housing, such as helping preserve existing affordable housing through rehabilitation projects and renter's assistance programs, and creating transitional housing units for individuals in emergency or transitional circumstances.

In the 2018-19 program year, the City successfully secured \$1,250,000 in Homeless Emergency Aid Program (HEAP) funds from the Continuum of Care (CoC). These funds will be used to create eight supportive housing units. This project is in its initial stages, but has seen progress in its development during the 2019-20 program year. Once complete, these housing units will provide approximately eight households with supportive housing each year and will work as a stabilizer for individuals that are in emergency housing situations. With a place to stay, individuals will be able to find stability that allows them to attain a job and eventually improve their financial standing in society.

In addition to this effort, the City continued to fund two fair housing programs in the 2019-20 program year—San Joaquin Fair Housing (SJFH) and California Rural Legal Assistance (CRLA). These programs assist individuals facing housing discrimination and landlord disputes to find solutions to these issues in a comprehensive and professional manner. SJFH operates a renter's helpline that provides counselors and legal advice for individuals who are suspected of being unfairly discriminated against in terms of their housing choice. Concurrently, but through a separate entity, CRLA administers rental unit housing testing and surveys that work to identify and scout for any instances of housing discrimination in the City.

The City continues to look for projects which would support affordable housing for low-income Lodi residents, some of whom may be homeless, at risk of homelessness, and/or disabled. Currently, the City is in the process of rolling out the Housing Rehabilitation program to be completed by the end of the 2020-21 program year. This program will provide approximately 10 low-income households with housing reparations and critical maintenance to improve their quality of life and the affordability of their homes.

Additionally, the City works with its homeless committee to find more strategies to address needs of homeless individuals. The City created a Homeless Liaison Officer position within the local Police Department in 2017. The officer conducts street outreach and connects individuals with resources and

local social service providers. The officer has reported success in helping individuals get housing and resources they need to be healthier.

COVID-19 Response:

In response to the COVID-19 pandemic, the City of Lodi is in the process of requesting grant assistance for providing housing assistance and services for people experiencing homelessness, who are at higher risk of severe health consequences from COVID-19, specifically elderly and immune compromised.

As of July 1, 2020, City staff is in the process of pursuing various grant funding opportunities that have been made available for jurisdictions across the State and Nation. Specifically, the City is applying for the following grants to fund various housing assistance and services:

- Emergency Solutions Grant Coronavirus Response (ESG-CV)
- Local Early Action Planning (LEAP)
- Permanent Local Housing Allocation (PLHA)
- CDBG Coronavirus Response (CDBG-CV)
- Homeless, Housing Assistance, and Prevention Program (HHAP)

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

The City has continued to be a participant in the Committee on Homelessness, made up of key City staff, representatives from the Salvation Army, local faith-based organizations, and the Lodi Community Foundation, a local philanthropic organization. Led by the Lodi Community Foundation, this task force has built consensus and support to explore several short- and long- range solutions to reduce homelessness and mitigate its effect on the community. This culminated in the creation of a "Report on Homelessness in Lodi" which was presented to the Lodi City Council in September 2015. The City Council adopted that report and its long- and short- term strategies. The City has remained actively involved in the monthly committee and subcommittee meetings and has consolidated the other homeless outreach efforts into these meetings.

Lodi has also played a large role in the involvement with the CoC in the planning and execution of the countywide point-in-time homeless count that took place in January 2019. Additionally, the City remains involved with the County Emergency Food and Shelter Program Board.

The City values its relationships with homeless service providers and reaches out to those providers for input on needs. Many of these service providers also attend City Council meetings to provide feedback

on the homeless population.

In 2017, a Homeless Liaison Officer position was created in the Lodi Police Department. The officer works directly with the local unsheltered homeless to offer assistance, connect them with available services, and find placement in shelters and more permanent housing.

The City supported the Board of Supervisors in its creation of a lead position at the County level during the 2018-19 program year. The County now has a program administrator for homeless services; this position is aimed at bringing about new homeless and affordable housing resources to the county, as well as increasing coordination among local jurisdictions. Additionally, this position helps coordinate the point-in-time counts for the County.

The Lodi Improvement Committee, a City board and commission with members appointed by the City Council, continues to serve as a forum for discussing, gathering information, and promoting actions regarding homeless issues, among other resident-driven topics in the City. The committee had the goal of supporting the 2019 homeless point-in-time count. Homeless providers stated that the count accuracy in 2019 improved since 2017. City staff continues to provide support to help this group meet its goals.

Addressing the emergency shelter and transitional housing needs of homeless persons

Residents of emergency shelters and transitional housing often need additional services, such as rehabilitation programs, case management, medical evaluations, and living environments that allow for stability in the time it takes to get permanent, supportive housing. Additionally, these facilities are often in need of repairs due to steady and intensive use. The City has been adamant in recognizing the need for both more transitional housing and for providing additional resources for the preexisting facilities, both of which have been voiced by service providers in prior years.

For the 2019-20 program year, the City agreed to fund a capital improvement project for the Salvation Army to repair a walk-in refrigerator at its Lodi Corps facility, which is used to store nutritious meals that are then distributed to individuals in need; concurrently, the Salvation Army Hope Harbor shelter would be receiving replacements of eight HVAC units. These projects will help the Salvation Army's everyday provision of services and will help provide a better quality of life to the individuals that request services. The projects were not complete by the end of the program year; however, both are anticipated to be completed by the end of the calendar year.

The City submitted a HEAP application during the 2018-19 program year, in which \$1,250,000 funding was secured to be put toward constructing permanent supportive housing units. The total estimated cost of the project is \$1,800,000. The Lodi Tiny House project will create approximately eight units of permanent supportive housing for homeless individuals and families or those at risk of homelessness. This supportive housing will help homeless individuals/families move from emergency shelters, motel voucher and transitional housing programs, or off the streets into long-term, affordable housing where they can continue their progress toward stable and independent living. The project also helps those facing a housing crisis and at risk of becoming homeless, such as people experiencing job loss or domestic violence. The project will receive tenant referrals from local organizations including Salvation Army, Lodi House, and Women's Center, although more agencies may be added. HEAP funds will be

used to purchase property, develop the site, and purchase and install manufactured tiny homes. While the Lodi Tiny House project was included in the 2019-20 Annual Action Plan, ultimately the project was cancelled as a part of the CDBG project. The Lodi Tiny Homes project is still being pursued by the City without using CDBG allocation as a funding source.

The City supported basic human needs by continuously providing funds to Second Harvest Food Bank, which provides bulk food goods to local shelters. The City also continued to support the LOEL Senior Center by providing food and nutrition for seniors who might otherwise not have the funds. Both programs provide food to extremely low- and very low-income residents across the City. Providing this food can help residents free up funds for other necessities, such as health and housing.

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

The City uses several strategies to assist chronically homeless individuals. The following activities have occurred or are in process.

- HEAP grant funds have been obtained by the City to begin a project focused on supplying permanent supportive housing to chronically sheltered and unsheltered individuals. This project, the construction of tiny homes for homeless individuals who qualify, will provide a supportive environment to end the cycle of chronic homelessness and need for transitional housing. The City will be researching additional funding sources to cover the total costs of the projects and to look for funding opportunities to replicate the project in other locations.
- The City and the Committee on Homelessness have supported Ready to Work in providing its services to individuals who may be chronically homeless because they are unable to receive general assistance (welfare) due to a record of criminal conduct. This program provides employment and an income when these individuals would otherwise not qualify for assistance or pass a background check for a job and it will be funded by CDBG in the 2020-21 program year.
- The City supported the Salvation Army in its provision of services. With the use of CDBG funds, the Salvation Army Hope Harbor Shelter will be able to fix its eight air conditioning units, replace its refrigerator, and fund administrative purposes to allow for a smooth operation of the shelter.
- The Committee on Homelessness coordinates with the Homeless Liaison Officer, a position in the Lodi Police Department that connects homeless people, on an individual basis, with needed programs, resources, and shelter. One member of the committee sits on the Emergency Food and Shelter Board and members frequently participate in CoC board activities to address homelessness (such as point-in-time counts).
- The City and Lodi Improvement Committee worked with local hotel/motel owners to create affordable housing opportunities. The committee also took an active role in planning and

participating in the homeless point-in-time count, applying for HEAP funds, and otherwise supporting the Committee on Homelessness's efforts.

- The City continued to support Second Harvest Food Bank, which provides food to many local Lodi service providers that then distribute this food to homeless and at-risk homeless individuals and families. Healthy food contributes to better health, which in turn can reduce associated medical costs and financial stress, which can be a factor in homelessness.
- Similarly, the City supports the LOEL Center and Salvation Army, which provide food to extremely low- and very low-income residents across the City. Food provision can help some residents save funds to use on other necessities such as health and housing.
- The City has continued to support the CoC's efforts to create additional beds for chronically homeless persons through two primary strategies: (1) having the CoC apply for additional new Shelter Plus Care funding that will target chronically homeless individuals, and (2) increasing the number of beds for chronically homeless individuals by modifying existing Shelter Plus Care programs that do not specifically target chronically homeless persons. This second strategy would be achieved by prioritizing chronically homeless persons when filling vacancies in non-targeted Shelter Plus Care programs as they occur.
- The City collaborated with San Joaquin County to create a new lead position for better coordination of homeless resources and services across the county.
- Cranes Landing (previously Tienda Drive Senior Housing), an 80-unit affordable senior housing project, was completed in the summer of 2017. It provides permanent housing to homeless seniors and seniors at risk of homelessness.

In response to the COVID-19 pandemic, the City of Lodi is in the process of requesting grant assistance from multiple funding sources in providing a non-congregate, low-bar, temporary, 24/7 emergency shelter for persons and families experiencing homelessness. Additionally, a more permanent Navigation Center is also in the process of being planned. Please refer to section 91.520(b) for more information on these projects.

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

To assist families in avoiding homelessness, the City has supported the Community Partnership for Families youth program, which promotes the mental, emotional, social, and educational well-being of Lodi's youth. This in turn helps them to make positive choices about their future, including efforts at schools and with career opportunities. Some youth come from families that have experienced multi-generational poverty, and this program contributes to ending that cycle through opportunities for educational mentoring, interpersonal communication, skill training, and mapping goals for the individual's future, including their family's future. The Community Partnership program takes a holistic look at family

health as part of its programming and to help improve core factors facing at-risk youth in the City.

The City also supports Second Harvest Food Bank, which helps families teetering on the edge of homelessness. Additionally, some of Lodi's seniors are on fixed incomes and face medical care expenses, often frequently. To assist these residents in meeting everyday living costs, the City assisted LOEL Senior Center with its Meals on Wheels Program. This program serves both hot and cold meals that are tailored to the nutritional and dietary needs of the elderly residents. Meals are delivered directly to seniors, who in turn receive a daily check-in to see if they have any additional needs.

The City's Committee on Homelessness is collaborating with partner organizations to establish a construction trades training program that would be targeted to assist homeless and/or unemployed persons, at-risk youth, those working in low-paying jobs, and any person seeking to obtain the skills necessary to seek gainful employment.

The City continued to work with and provide resources for the Lodi Gang Reduction, Intervention and Prevention (GRIP) program. The GRIP program offers many local services that form a support network for Lodi's at-risk youth. The program leans on Stockton services to provide safe housing for runaway and homeless youth. The GRIP program refers homeless teens to a safe house (teen shelter) that provides housing and transportation services. These services help to steer at-risk youth away from homelessness, while also working to mend family difficulties that may contribute to a higher risk of homelessness.

The City continues to have a strong relationship with the Salvation Army Lodi Corps. Their programs in Lodi offer financial assistance for low income families, food boxes, culinary arts training, job skills, and Hope Harbor Shelter which provides overnight care for men, women, and families with children, transitional living, as well as a cold-weather shelter. Salvation Army offers homeless services, support, and resources such as case management, hot meals offered 365 days a year, showers, clothing exchange, and "pre-program" supportive services to prepare individuals for one of their 6 month rehabilitation programs.

The City works with CA Human Development to help better serve low-income and minority communities in the jurisdiction. CHD's mission is to create opportunities for people to rise above barriers in pursuit of better lives. CHD has been serving under-served farm workers through workforce development and job training for over 50 years. In addition, CHD provides services to low income, disabled, substance abuse recovery clients, individuals with need for citizenship and immigration services, job training, and persons with need for low cost housing. In Lodi, CHD operates the Lodi WorkNet Center and has been providing immigration services from this office for six years in addition to the workforce development programming that is also offered at this location.

Lastly, foster care programs in San Joaquin County are overseen by the Human Services Agency. In California, state law requires public foster care programs to provide an independent living program and that a transition plan be formulated for all youth preparing for emancipation. The City has continued to work with the Human Services Agency and the CoC members to assist youth exiting the foster care system. The City contributed in identifying best practices for keeping youth exiting foster care from becoming homelessness.

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

Actions taken to address the needs of public housing

The Housing Authority of the County of San Joaquin (HACSJ) continued to be the public housing agency serving the City of Lodi. HACSJ is independent of the City of Lodi, and the City retains no control over its funding or implementation of programs.

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

HACSJ encouraged public housing residents to participate in policy, procedure, and program implementation and development through its Resident Advisory Board. HACSJ also distributed newsletters to all residents, which contains relevant news, information on training and employment opportunities, and other community resources available to public housing residents. Public housing residents also participate in the development of the HACSJ five-year and annual plans. The Resident Services Division distributes a survey to prioritize residents' needs and schedule short- and long-term improvements.

Actions taken to provide assistance to troubled PHAs

HACSJ is designated as a "High Performer."

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

Actions taken to remove or ameliorate the negative effects of public policies that serve as barriers to affordable housing such as land use controls, tax policies affecting land, zoning ordinances, building codes, fees and charges, growth limitations, and policies affecting the return on residential investment. 91.220 (j); 91.320 (i)

In the 2019-20 program year, the City funded the following programs and projects to address the need for actions against affordable housing barriers:

- San Joaquin Fair Housing Services
- California Rural Legal Assistance

A detailed summary of actions taken to address barriers to affordable housing, as outlined by the Analysis of Impediments to Fair Housing Choice, can be found below in section 91.520(a).

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

In the 2019-20 CDBG program year, the City supported the following programs to address underserved needs:

- San Joaquin Fair Housing's housing counseling services, outreach, and seminars.
- California Rural Legal Assistance's fair housing testing and recommended actions to prevent discrimination.
- Second Harvest Food Bank's services to disabled, elderly, youth, and homeless populations and their families.
- Community Partnership for Families of San Joaquin's services, which predominantly serves at-risk youth populations and their families that are at risk of gang influence and activities. Many of the partnership's efforts help to serve Hispanic youth and their families.
- LOEL Senior Center's Meals on Wheels Program for elderly, many of which are disabled and have little ability to have social interaction or access to nutrition on their own.
- CA Human Development's immigration services to low-income minority populations in need of legal and immigration services.
- Salvation Army's Hope Harbor Shelter services to homeless and very low-income individuals in need of overnight shelter, referrals, case management, and access to other supportive service organizations.

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

In 2019-20, the City offered the following programs to reduce lead-based paint hazards:

- The City will provide lead-based paint testing as a component of its housing repair and rehabilitation programs when required by HUD regulations. Given the age and condition of Lodi's housing stock, lead-based paint testing is needed in a significant number of homes.
- Lodi had lead-based paint hazards flyers and information at City Hall for those seeking more information or for those who might be affected.

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

The City strives to insure the CDBG program serves as many poverty-level families as possible. In the 2019-20 program year the City used CDBG funds to fund projects associated with preserving affordable housing, expanding housing and services for the homeless, providing legal and immigration services for minority populations, and providing various social services to low-income families and youth. The City plans to continue to fund activities that closely relate to the 2019-23 Consolidated Plan's Strategic Plan goals, which are largely focused on reducing poverty and supporting low-income areas with various community development activities.

In the 2019-20 program year, the following nonprofits provided these instances of service to Lodi residents:

- Second Harvest Food Bank: Served 2,795 new participants, ultimately serving 550,873 pounds of supplemental food in the City of Lodi
- LOEL Senior Center: Provided 95 homebound seniors nutritious meals five days a week. This program largely helps to assist disabled elderly, many of whom are in need of financial and medical assistance.
- Community Partnership for Families San Joaquin: Provided 151 youth through their support and counseling program. The benefit from their program also goes on to benefit the household of the recipient.
- San Joaquin Fair Housing: Served 566 individuals with housing-related services; their program is a great resource for low-income families that are facing various rental housing issues.
- CA Human Development: Provided immigration services to 101 resident immigrants, along with outreach to over 500 Lodi immigrants and a Citizenship Day celebration in September 2019. CHD also increased services to the Pakistani and Indian population by 12.8%.
- Salvation Army's Hope Harbor Shelter: Served a total of 976 unduplicated individuals over the program year, by providing services such as overnight shelter, referrals, case management, and access to other supportive service organizations

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

The City's CDBG-funded programs are administered by the City's Community Development Department, Neighborhood Services Division. This division works collaboratively with other departments/subdivisions, such as Planning, Code Enforcement, and Public Works. Also, City staff is the liaison to the Lodi Improvement Committee and stays updated on Lodi's Committee on Homelessness and the County

Emergency Food and Shelter Program Board. Participation in these committees helps the City's CDBG program stay current and aware of the most pressing community needs, as well as allowing networking and problem-solving with local and regional social service providers, some of which bring in additional resources to the City.

A significant gap in access to social services for Lodi residents is due to a lack of social services in the City. Many services are located outside of Lodi, usually in Stockton. The City's GrapeLine bus system connects to San Joaquin Regional Transit, which goes to Stockton. Residents, however, are often deterred by the cost, number of transfers, and length of trips. Since 2014, the City has encouraged and pursued opportunities for out-of-town service providers to have satellite facilities/offices in Lodi.

In 2015, the City updated its Housing Element, which discusses issues such as multi-family and affordable housing, reviewed existing HUD-funded housing programs, and evaluated their effectiveness.

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

The City continues to participate in regional coordination of services through the Lodi Committee on Homelessness and other networking opportunities.

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

San Joaquin Fair Housing was able to mediate/counsel 566 families in the City of Lodi with a total household size of 1,983 during the 2019 – 2020 program year, which exceeded their initial projections. SJFH hosted one Tenant/Landlord workshop instead of the two that were originally projected. SJFH also participated in two Lodi community events. SJFH had planned another Tenant/Landlord workshop in April, however, due to the COVID-19 pandemic they were unable to hold this event.

San Joaquin Fair Housing remained open during the COVID-19 pandemic. SJFH was able to answer questions from tenants and landlords about housing issues impacted by COVID-19, including the moratorium on evictions and general questions about rights & responsibilities from both tenants and landlords. SJFH shared documents for tenants to give to landlords regarding tenant's loss or reduced income due to the pandemic and advised landlords on how they could work with their tenants during this pandemic. SJFH implemented additional public information on their website, as well as an informational table outside of their office, which worked to provide community members with resources.

Overall, SJFH was able to mediate and counsel 6,447 families with a total household of 21,752 in San Joaquin County during the 2019 -2020 fiscal year.

Additionally, the City procured services with CRLA to provide systematic and thorough discrimination testing. CRLA conducted six tests of the five required. Two tests showed unfair treatment based on

national origin. CRLA was not able to conduct follow up Fair Housing outreach at this location due to the COVID-19 Pandemic and County/State-wide stay-at-home orders. CRLA will continue to monitor this housing complex for future testing and fair housing outreach. CRLA conducted two housing complex surveys, exceeding the requirement of surveying one complex. CRLA did not find any unfair treatment at either of these housing complexes, but provided fair housing outreach at both sites.

CRLA made the following recommendations:

- Continue using tests and surveys to investigate barriers to housing choice;
- Consider conducting fair housing outreach at local community events in Lodi
- Continue identification of, and testing at, new rental housing developments;
- Continue conducting outreach to any sites testing positive for discriminatory conduct and surrounding areas to ensure diverse community groups are given an opportunity to participate in the development process; and
- Consider using any test or survey results indicating discrimination to inform educational opportunities for housing consumers, housing providers, housing developers, community-based organizations, and City staff.

SJFH and CRLA met on a quarterly basis during the 2019-20 program year to discuss various issues related to fair housing in San Joaquin County and Lodi. Both agencies work with the same clientele and discuss new ordinances that will affect the clientele they serve in order to ensure they are providing corresponding information.

The City will take actions as recommended from the completed and approved Analysis of Impediments. Actions taken during 2019-20 plan year to overcome the identified impediments are as follows:

1. Lack of sufficient subsidized and unsubsidized affordable housing supply, particularly for low-income special needs households:

- Action: The City made progress in the initial planning and acquisition portions of the HEAP: Tiny Homes project during the 2019-20 program year. This project is set to be complete by June 2021, and will supply approximately four supportive housing units to qualified individuals upon completion.
- Action: The City began to roll out the Housing Rehabilitation and Repairs project during the 2019-20 program year. This project will supply approximately ten qualifying households with critical repairs to their home. This project is expected to be completed by the end of the 2020-21 program year.

2. Lack of available rental housing subsidy for lower-income households.

- Action: The City continues to support HACSJ in its administration of the Housing Choice Voucher rental assistance program, which may include distribution of program information at the Community Development public counter; distribution of program information to rental property owners as part of the City's code enforcement activities; consultations with representatives of

HACSI to discuss actions the City can take to encourage greater participation in the voucher program by rental property owners; and updating the City's new CDBG website to include a link to the HACSI website, found here: <https://www.hacsionline.org>. During 2019-20, the City of Lodi began to work with the Housing Authority to pursue HOME funding for acquisition and rehabilitation of an existing apartment complex; however, due to change in project schedule, the grant application will be postponed.

3. Different origination and denial rates based on neighborhood.

- Action: The City of Lodi has continued to track fair housing complaints and cases lodged in the City to ensure that lenders are not violating fair housing law with discriminatory lending practices.
- Action: During 2019-20, the City continued outreach to residents about their fair housing rights and how to seek assistance. This was largely done through the specified fair housing programs that are carried out by CRLA and SJFH.
- Action: The City of Lodi continues to support home purchase programs targeted to low/moderate-income households, such as down payment assistance and homeownership mortgage counseling, as long as funding is available. The City may elect to pursue additional funding for down payment assistance at a future time if funding becomes available. The City has identified supporting first-time home buyers as a top priority in upcoming CDBG program years.

4. Lack of information on the nature and basis of housing discrimination and the resources available to seek assistance.

- Action: The City of Lodi has continued to monitor the incidence of housing discrimination complaints and report trends annually in conjunction with the CAPER. Additionally, the City has updated formal policies and procedures for persons with disabilities to request reasonable accommodations to local planning and development standards. Information on the accommodations that a resident can request has been made available online and an ADA compliance officer has been identified as well. Information can be found here: <http://www.lodi.gov/675/Website-Accessibility>.
- Action: The City of Lodi has continued to include a review of prior year performance regarding affirmatively furthering fair housing in the annual planning for the use of CDBG funds. The City will identify funding support that addresses the removal of impediments or advancing specific fair housing goals. During 2019-20, the City procured services from CRLA to provide housing discrimination testing and surveys at multiple sites throughout the City.
- Action: The City has continued to work with local agencies to improve the collection and reporting of information on discrimination, particularly based on religion, race and ethnicity, age, gender, marital status, presence/absence of children, and household size. These agencies include the apartment associations as well as SJFH and other nonprofit groups that regularly come into contact with groups at risk of housing discrimination.
- Action: The City required that CRLA gather information and report on the types of discrimination that it finds through various methods in their specified activities listed for the 2019-20 program

year. This reporting included research, tenant interviews, and first-hand testing, which is then relayed to the City once the program year has come to a close.

- Action: The City funded CRLA to complete their fair housing testing program. This program conducted fair housing testing to identify the presence of discrimination. Testing included at least five properties each time. As mentioned above, City procured services from CRLA to provide housing discrimination testing at six sites and to conduct two resident surveys.
- Action: The City has continued to work with SJFH to improve outreach to residents at risk of discrimination, using marketing, educational efforts, and partnerships with other agencies (schools, utilities, etc.) to disperse fair housing informational materials. During the 2019-20 program year, the City supported SJFH's project to provide training to landlords in Lodi on fair housing practices, among other best housing discrimination mitigation practices. The organization provided one training and attended two resource fairs in Lodi.

5. Concentration of lower-income households and minority households in less desirable neighborhoods.

- Action: The City encourages a mixture of household incomes in new developments. As part of the Annual Action Plan, the City has continued to track changes in geographic concentrations for lower-income and minority households. Through CDBG funding, the City continues to support projects that target the geographic concentrations of lower-income and minority households. These concentrations continue to be located on the eastern sides of the City. Additionally, the development of an 80-unit affordable senior housing project has been a huge step toward the creation and distribution of affordable housing for low-income disabled elderly households. City staff worked with the developer/management company to ensure that the project has appropriate marketing to Lodi's current low-income and minority communities.

6. Fair housing education:

- Action: The City has continued to display fair housing flyers to educate people about fair housing. During the 2019-20 program year, SJFH conducted outreach on fair housing and attended community events.
- Action: The City published information online about available housing services and programs in the City. Once a year, the City publishes information in Spanish to inform persons fluent in Spanish but with limited English language proficiency about the availability of housing services and programs in the City. The City also has bilingual staff available daily during business hours to assist. During 2019-20, the City posted marketing material in both Spanish and English for fair housing services.

CR-40 - Monitoring 91.220 and 91.230

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

The City's CDBG program is currently run by two CDBG program specialists, both of whom carry out the responsibilities associated with the CDBG program. The program specialists oversee reporting requirements, monitor the budget, conduct procurement activities, enforce labor compliance standards, and attend to other tasks. They are available to offer assistance and answer questions from subrecipients and are in contact with each subrecipient, at least quarterly, regarding quarterly reports or other matters. The program specialists are contractors that are part of a team of experienced professionals that the City draws upon for expertise and assistance, as needed. The program specialists have over 11 years of experience in comprehensive implementation of the Consolidated Plan, Housing Element, Analysis of Impediments to Fair Housing, and other planning documents.

The City has developed a monitoring system to ensure that the activities carried out in furtherance of the Consolidated Plan are done so in a timely manner in accordance with the federal monitoring requirements of 24 CFR 570.501(V) and 24 CFR 85.40 and all other applicable laws, regulations, policies, and sound management and accounting practices. The objectives of monitoring are to:

- Determine if a subrecipient is carrying out its community development program, and its individual activities, as described in the application for CDBG assistance and the Subrecipient Agreement.
- Determine if a subrecipient is carrying out its activities in a timely manner, in accordance with the schedule included in the Agreement.
- Determine if a subrecipient is charging costs to the project that are eligible under applicable laws and CDBG regulations, and reasonable in light of the services or products delivered.
- Determine if a subrecipient is conducting its activities with adequate control over program and financial performance, and in a way that minimizes opportunities for waste, mismanagement, fraud, and abuse.
- Assess if the subrecipient has a continuing capacity to carry out the approved project, as well as future grants for which it may apply.
- Identify potential problem areas and assist the subrecipient in complying with applicable laws and regulations.
- Assist subrecipients in resolving compliance problems through discussion, negotiation, and the provision of technical assistance and training.
- Provide adequate follow-up measures to ensure that performance and compliance deficiencies are corrected by subrecipients, and not repeated.
- Comply with the federal monitoring requirements of 24 CFR 570.501(b) and with 24 CFR 84.51 and 85.40, as applicable.

- Determine if any conflicts of interest exist in the operation of the CDBG program, per 24 CFR 570.611.
- Ensure that required records are maintained to demonstrate compliance with applicable regulations.

The City has continued to track and report on its progress toward meeting its housing and community development goals throughout the 2019-20 program year. Pertinent information has been incorporated into this CAPER.

In recent years, the City has updated its monitoring procedures with the following improvements, per HUD's recommendation. The policy lays out staff goals for both desk monitoring and on-site monitoring practices. When desk monitoring, the City reviews each subrecipient's grant performance and financial documentation on a quarterly basis, at minimum. Subrecipients are selected for more in-depth on-site monitoring based on certain criteria, which are listed in the table below. When the City conducts its on-site desk monitoring, staff follows up with the subrecipients as needed to resolve any outstanding items. More specifically, the City's policy was revised to state that 25 percent of subrecipients will be formally monitored (on-site) each program year, and that the following criteria will be used to select them.

Criteria	Rating			Selection
	0	1	2	
The amount of the applicable award	0 Less than \$2,500	1 \$2,500 to \$10,000	2 More than \$10,000	
Completeness and accuracy of quarterly reports and invoices	0 Complete	1 Incomplete but timely to fix	2 Incomplete and long delay in fixing	
Administrative capacity with emphasis on staff turnover	0 Adequate	1 Minimal gaps in capacity	2 Significant gaps in capacity	
Length of time as CDBG subrecipient	0 Less than 1 year	1 At least 1 year	2 2 or more years	
Outcome of any previous monitoring visit	0 No findings	1 Findings resolved within 60 days	2 Findings not resolved within 60 days	
Other factor _____.	0	1	2	
For reasons stated in the "formal monitoring" section	On-site monitoring	On-site monitoring	On-site monitoring	
Total Score:				

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

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

The City will provide a draft of this CAPER to the public for comment 15 days prior to the City Council public hearing on September 16, 2020. The City posted and published a notice regarding the City Council hearing on the draft CAPER.

As a public agency, the City strives to accomplish effective transparency through three methods, which are identified in the written documents: how staff solicits public comment for use of the funding, what the City has proposed to do with the grant funding, and what the City has accomplished with the use of those funds.

This CAPER will be made available to the public for 15 days starting September 2, 2020, and ending September 16, 2020. All comments will be incorporated into the report once they have been received.

The 2019-20 CAPER is set to be reviewed and approved by City Council on September 16, 2020. Upon approval, the CAPER will be submitted to HUD no later than September 30, 2020.

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 2019-20 program year was the first year of implementing the City of Lodi's 2019-23 five-year Consolidated Plan. This Consolidated Plan set forth the priority needs and goals for the CDBG program over a five-year period which spans from July 1, 2019, to June 30, 2023.

In October 2019, HUD approved this plan with a recommendation that the City amend its 2019-23 Consolidated Plan to improve impact and reduce administrative burden. The City completed the recommended amendment in January 2020. During the Consolidated Plan Amendment process, City staff reached out to local residents, community stakeholders, Lodi Improvement Committee members, and Lodi City Council to gather feedback on the prioritization of needs and goals to be revised and selected for the 2019-23 Consolidated Plan. The following is a list of the newly created Strategic Plan priority needs based on the feedback received from the amendment outreach project:

2019-23 Priority Needs:

1. Safer Neighborhoods and More Resident Pride:
 - a. Neighborhood watch groups or neighborhood policing
 - b. Streetlights (Note: more information to be gathered on issue of lighting)
 - c. Garbage clean ups
 - d. Graffiti Abatement
 - e. Locally empowered leaders
2. Improvements to Community Parks and Green Spaces:
 - a. Park cleanup
 - b. Park improvements for youth recreational activities
 - c. Community gardens
3. Improvements to Infrastructure and Facilities Access:
 - a. Alley improvements in CDBG target area
 - b. ADA improvements
 - c. Sidewalk infill in CDBG target area
4. Fewer Barriers to Affordable Housing:
 - a. Create new affordable housing units
 - b. Improve affordability of rental units
 - c. Improve homeownership
 - d. Farmworker housing
5. Improve Housing Conditions:
 - a. Critical repair program
 - b. Code enforcement

- c. Housing rehabilitation
 - d. Rehabilitate affordable housing units
- 6. Housing for Homeless and At-Risk Homeless:
 - a. Transitional/supportive housing units
 - b. Emergency units
 - c. Housing/rental assistance vouchers
- 7. Services for Children/Youth:
 - a. Childcare
 - b. After-school programs
 - c. Gang prevention
 - d. Homework help
 - e. Mental health
- 8. Services for very-low income adults, seniors, disabled (priority populations):
 - a. Meal and emergency food services
 - b. Mental health
 - c. General supportive services
- 9. Services for Homeless/At-Risk Homeless Individuals:
 - a. Mental Health Services
 - b. General assistance
 - c. Job training and employment opportunities
 - d. Domestic violence and emergency health services
- 10. Support Fair Housing Services (HUD requires this through AFFH rule)
- 11. More Local Leaders:
 - a. ABCD Program
 - b. Youth leadership

Additionally, the following goals represent the new amended goals of the 2019-23 CDBG Consolidated Plan, in which each goal was created to address each priority need. These goals are outlined by the Strategic Plan section of the 2019-23 Consolidated Plan:

2019-23 Goals:

- 1. Promote Safer Neighborhoods
- 2. Improve Community Parks and Green Space in CDBG target area
- 3. Infrastructure and Facility Improvements
- 4. Increase and Maintain Supply of Affordable Housing
- 5. Build Capacity in CDBG Target Area

6. Support Public Service Programs for Priority Populations
7. Affirmatively Further Fair Housing
8. Improve Housing Affordability
9. Support Programs and Projects that Reduce and Prevent Homelessness
10. Create and Promote Housing for Homeless Populations

The City of Lodi used a needs-based approach and a place-based approach to develop its strategies for selecting priority activities over the course of the next five-year planning period. The needs-based approach sought to find and examine where deficiencies or gaps existed and then directed grant resources toward filling those gaps. The place-based approach focused on prioritizing particular geographies or physical locations in the City. Additionally, the City used an assets-based strategy. While CDBG regulations and methodology principally rely on a needs-based approach, the City recognizes and values the assets-based approach as an effective way to make lasting improvements in the community and a method that better engages and empowers community members who may have been unengaged in previous processes or passive beneficiaries of such activities. Through the City's recent involvement with the Asset-Based Community Development (ABCD) program (called ABCD: Love Your Block), the City will look for opportunities to grow existing assets and involve residents in the creation and design of priority activities, in partnership with the City and other community stakeholders and resources.

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