



CITY OF RANCHO CUCAMONGA

Draft 2019-2020 Consolidated Annual Performance and Evaluation Report

DRAFT FOR PUBLIC COMMENT PERIOD
December 1 – December 16, 2020

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CR-05 - Goals and Outcomes

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

The City of Rancho Cucamonga has prepared the 2019-2020 Consolidated Annual Performance and Evaluation Report (CAPER) as required by the U.S. Department of Housing and Urban Development (HUD) which describes the use of federal Community Development Block Grant (CDBG) funds during the fifth and final program year of the 2015-2019 Consolidated Plan period covering July 1, 2019 to June 30, 2020.

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

For the 2019-2020 program year, the City received \$993,159 of CDBG funds from HUD, which was combined in the Action Plan with \$31,226 of unallocated CDBG funds from prior years as well as \$45,101 of Program Income for a total investment of \$1,069,486. This investment of CDBG funds was a catalyst for positive change in the community. Together with other federal, state and local investments, HUD resources allowed the City and its partners to:

- Provide fair housing services to 399 residents
- Provide healthy meals to 888 residents, 577 of which were seniors
- Provide transportation services to 317 seniors
- Provide assistance to 256 homeless or at-risk of becoming homeless individuals
- Provide domestic violence services to 48 residents
- Provide after school activities to 44 youth
- Provide a variety of senior programs to 474 residents
- Provide family stabilization services to 263 residents
- Rehabilitate housing of 25 residents
- Complete construction of Wheelchair Ramps
- Complete grinding and repair of sidewalks

Table 1 provides a summary of the five-year and one-year accomplishments for the period ending June 30, 2020, arranged by each of the Strategic Plan Goals included in the 2015-2019 Strategic Plan of the Consolidated Plan.

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

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

Goal	Category	2019-2020 Amount	Indicator	Unit of Measure	5-Year Strategic Plan			2019-2020 Program Year 5		
					Expected	Actual	Percent Complete	Expected	Actual	Percent Complete
Affirmatively Further Fair Housing Choice	Fair Housing	CDBG: \$17,900	Public service activities other than Low/Moderate Income Housing Benefit	Persons Assisted	150	677	451.33%	375	399	106.40%
Historic Preservation	Non-Housing Community Development	CDBG: \$0	Other	Other	1	0	0.00%	0	0	0.00%
Homelessness and At-Risk of Homelessness	Homeless Non-Housing Community Development	CDBG: \$15,500	Public service activities other than Low/Moderate Income Housing Benefit	Persons Assisted	50	2,900	5,800.00%	195	304	155.90%
Improve Public Facilities and Infrastructure	Non-Homeless Special Needs	CDBG: \$45,700	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit	Persons Assisted	0	35,380	0.00%	20,650	56,495	273.58%
Public Services	Non-Housing Community Development	CDBG: \$114,500	Public service activities other than Low/Moderate Income Housing Benefit	Persons Assisted	20,750	45,336	218.49%	1,986	1,986	100.00%
Rehabilitation of Existing Housing	Affordable Housing Non-Homeless Special Needs	CDBG: \$503,964	Homeowner Housing Rehabilitated	Household Housing Unit	125	93	74.40%	40	25	62.50%

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

During the program year, the City and local nonprofit organizations made progress on several 2019-2020 activities as well as some multi-year activities that continued over from the previous program year. All CDBG funded activities addressed specific high priority objectives identified in the 2015-2019 Consolidated Plan.

The majority of CDBG funds available in the 2019-2020 Action Plan were allocated to the Home Improvement program. As of June 30, 25 homes have been rehabilitated, and 83 percent of the allocated funds were spent. Additionally, CDBG public service activities carried out by nonprofit organizations were completed during the Program Year including fair housing services, homelessness prevention services, senior services and other public services benefitting low- and moderate-income residents.

Final billings of the 2018-2019 Home Improvement Program, Wheelchair Ramps, Sidewalk Grinding and Upper Cucamonga Storm Drain Improvements projects were processed in the 2019-2020 program year. Therefore, both projects are being reported as "complete" in the 2019-2020 CAPER.

All of the activities funded during the program year are listed in Figure 1, including the amount of CDBG funds allocated to the activity and the amount spent as of June 30, 2020. Figure 2 provides the numeric accomplishment goal and the accomplishments as of June 30, 2020.

Figure 1 - Use of CDBG Funds

Strategic Plan Goal / Activity	Source	Allocation	Spent through 6/30/20	Percent Spent
1. Affirmatively Further Fair Housing Choice				
IFHMB - Fair Housing Services	CDBG	\$17,900.00	\$17,900.00	100.00%
	Subtotal	\$17,900.00	\$17,900.00	100.00%
2. Homelessness and At-risk of Homelessness				
House of Ruth	CDBG	\$5,500.00	\$4,213.32	76.60%
Foothill Family Shelter - Housing	CDBG	\$5,000.00	\$5,000.00	100.00%
Foothill Family Shelter – Food Pantry	CDBG	\$5,000.00	\$5,000.00	100.00%
	Subtotal	\$15,500.00	\$14,213.32	91.70%
3. Improve Public Facilities and Infrastructure				
Wheelchair Ramps	CDBG	\$22,850.00	\$18,417.38	80.60%
Sidewalk Grinding	CDBG	\$22,850.00	\$19,701.53	86.22%
	Subtotal	\$45,700.00	\$38,118.91	4.85%
4. Public Services				
Graffiti Removal	CDBG	\$15,000.00	\$15,000.00	100.00%
Inland Valley Hope Partners - SOVA	CDBG	\$12,500.00	\$12,500.00	100.00%
Senior Services	CDBG	\$12,500.00	\$11,059.20	88.47%
Family Service Association – Senior Nutrition	CDBG	\$10,000.00	\$10,000.00	100.00%
RC Library – Back to Basics	CDBG	\$8,000.00	\$0.00	0.00%
Camp Fire ISCC	CDBG	\$5,000.00	\$0.00	0.00%
Northtown Collaborative	CDBG	\$9,300.00	\$8,798.08	94.60%
Senior Transportation	CDBG	\$16,400.00	\$16,400.00	100.00%
CASA	CDBG	\$9,000.00	\$8,917.80	99.08%
Bringing Health Home	CDBG	\$13,000.00	\$12,944.08	99.57%
National CORE – After School and Beyond	CDBG	\$3,800.00	\$3,800.00	100.00%
	Subtotal	\$114,500.00	\$99,419.16	86.83%
5. Rehabilitation of Existing Housing				
Home Improvement Program	CDBG	\$503,964.00	\$422,467.50	83.83%
	Subtotal	\$503,964.00	\$422,467.50	83.83%
6. Planning and Administration				
CDBG Program Administration	CDBG	\$180,100.00	\$179,548.64	99.69%
	Subtotal	\$180,100.00	\$179,548.64	99.69%
	Total	\$877,664.00	\$771,667.53	87.92%

Figure 2 - Program Year Accomplishments by Strategic Plan Goal

Strategic Plan Goal / Activity	Unit of Measure	Expected	Actual
1. Affirmatively Further Fair Housing Choice			
IFHMB – Fair Housing Services	People	375	399
2. Homelessness and At-risk of Homelessness			
House of Ruth	People	100	48
Foothill Family Shelter - Housing	People	20	70
Foothill Family Shelter – Food Pantry	People	75	186
3. Improve Public Facilities and Infrastructure			
Wheelchair Ramps	People	10,325	16,330
Sidewalk Grinding	People	10,325	40,165
4. Public Services			
Graffiti Removal	People	10,325	35,620
Inland Valley Hope Partners - SOVA	People	310	263
Senior Services	People	150	474
Family Service Association – Senior Nutrition	People	515	577
RC Library – Back to Basics	People	125	0
Camp Fire ISCC	People	425	0
Northtown Collaborative	People	100	194
Senior Transportation	People	115	317
CASA	People	150	60
Bringing Health Home	People	66	57
National CORE – After School and Beyond	People	30	44
5. Rehabilitation of Existing Housing			
Home Improvement Program	Housing Units	40	25
6. Planning and Administration			
CDBG Program Administration	N/A	N/A	N/A

NOTE: The actual goals figure represents the number of unduplicated persons assisted. Some received multiple or ongoing services throughout the year, such as the seniors involved with the Senior Services and Senior Transportation programs. Construction of the PY18-19 Wheelchair Ramps, PY 18-19 Sidewalk Grinding, and PY18-19 Upper Cucamonga Storm Drain was completed during this program year. Therefore, those projects will be reported as “complete” in the 2019-2020 CAPER. In addition, final payments for the PY18-19 Home Improvement Program were completed during this program year and as such this activity is also being marked complete in the 2019-2020 CAPER.

CR-10 - Racial and Ethnic composition of families assisted

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

Table 2 - Assistance to Racial and Ethnic Population by Source of Funds

	CDBG
White	1,312
Black or African American	304
Asian	286
American Indian or Alaskan Native	9
Native Hawaiian or Other Pacific Islander	14
American Indian/Alaskan Native & White	7
Asian & White	25
Black or African American & White	22
American Indian/Alaskan Native & Black/African American	4
Other Multi-Racial	263
Total	2,246
Hispanic	507
Non-Hispanic	1,739

**Note:* The data in this table is supplied by HUD's database and reports from the Inland Fair Housing and Mediation Board. The figures in this table represent the sum of the reported number of people, families, households, or housing units reported during the fiscal year, without regard to the number of people in each family, household or housing unit. In addition, the data in this table reflects 100 percent completed activities only.

Narrative

Table 2 provides an aggregate of race and ethnicity data for the combined number of people, families, households, or housing units served during the program year based on accomplishment data from all CDBG activities reported in HUD's Integrated Disbursement and Information System (IDIS).

CR-15 - Resources and Investments 91.520(a)

Identify the resources made available

Table 3 - Resources Made Available

Source of Funds	Resources Made Available	Amount Expended During Program Year
CDBG	\$1,069,486	\$1,578,682.59

Narrative

The CDBG resources made available included \$993,159 of CDBG formula grant funds and \$31,226 of unallocated CDBG funds from prior years as well as \$45,101 of Program Income for a total investment of \$1,069,486. The total amount expended during this program year was \$1,578,682.59.

Construction of the 2018-2019 Wheelchair Ramps, Sidewalk Grinding, and Upper Cucamonga Storm Drain Improvements projects was completed during the program year. Therefore, both activities will be reported as complete in the 2019-2020 CAPER. In addition, final payments for the 2018-2019 Home Improvement program were completed during this program year and as such this activity is also being marked complete in the 2019-2020 CAPER.

Identify the geographic distribution and location of investments

Table 4 - Identify the geographic distribution and location of investments

Target Area	Planned Percentage of Allocation	Actual Percentage of Allocation	Narrative Description
Citywide	49%	49%	Citywide Area Activities: Fair Housing, Public Services, Homelessness Prevention activities, and the Home Improvement Program.
Low- and Moderate-Income Target Areas	51%	51%	LMA Activities: Public Facilities and Infrastructure Improvements

Narrative

During the 2019-2020 program year, the City expended CDBG funds in a manner consistent with the National Objectives of the program. 100 percent of the CDBG funds expended were for activities that benefited low-

to moderate-income persons. The percentage includes Administration and Planning activities.

The City's investment in Fair Housing services, Public Services, and Homelessness Prevention services are based on a citywide geography because individuals in need of these services may live anywhere within the jurisdiction, particularly services for homeless and elderly populations.

Additionally, the City allocated CDBG funds for use in the City's three (3) target Areas that were qualified on a low- and moderate-income area basis where a specific proportion of the residents within the service area must be low- and moderate-income residents, such as the Graffiti Removal, Sidewalk Grinding, Upper Cucamonga Storm Drain and Etiwanda East Side Widening projects.

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

The City used CDBG funds to leverage appropriate state, local and private resources secured by each nonprofit organization providing public services. In addition, the City will seek to leverage other sources including but not limited to those listed below and as outlined in the Consolidated Plan.

During the program year, the City did not identify and did not use any publicly owned land or property located within the jurisdiction to address the needs identified in the Consolidated Plan. The City does not currently own land or property that is suitable for use in addressing the needs identified in the Consolidated Plan. Additional leveraging opportunities include, but are not limited to, those listed below.

Federal Resources

- Continuum of Care (CoC) Program
- HUD Veterans Affairs Supportive Housing (HUD-VASH)
- Housing Opportunities for Persons with AIDS (HOPWA)

State Resources

- Building Equity and Growth in Neighborhoods Program (BEGIN)
- Multifamily Housing Program (MHP)
- CalHFA Single and Multi-Family Program

Local Resources

- Housing Authority of the County of San Bernardino (HACSB)
- Southern California Home Financing Authority (SCHFA) Funding

Private Resources

- Federal Home Loan Bank Affordable Housing Program (AHP)
- Private Contributions

Matching Requirements

The CDBG program does not require matching funds.

CR-20 - Affordable Housing 91.520(b)

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

Table 5 - Number of Households

	One-Year Goal	Actual
Number of Homeless households to be provided affordable housing units	0	0
Number of Non-Homeless households to be provided affordable housing units	40	25
Number of Special-Needs households to be provided affordable housing units	0	0
Total	40	25

Table 6 - Number of Households Supported

	One-Year Goal	Actual
Number of households supported through Rental Assistance	0	0
Number of households supported through The Production of New Units	0	0
Number of households supported through Rehab of Existing Units	40	25
Number of households supported through Acquisition of Existing Units	0	0
Total	40	25

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

Affordable housing was identified as a high priority need in the 2015-2019 Consolidated Plan and Strategic Plan goals were established to provide the framework necessary to invest CDBG funds to address affordable housing needs which includes the rehabilitation of existing homes. Affordable housing renovations are typically multi-year projects and are subject to the ability to secure funding from various sources. Often, the ability to meet the anticipated goals is dictated by various factors that can create disparities between goals and actual outcomes such as: funding availability, timing and project schedules. Often, unexpected challenges are encountered during the repair phase of the project which causes delays that impact project delivery.

As the City's housing stock ages, a growing percentage of housing units may need rehabilitation to allow them to remain safe and habitable. The situation is of particular concern for low- and moderate-income homeowners who are generally not in a financial position to properly maintain their homes.

The age and condition of Rancho Cucamonga's housing stock is an important indicator of potential rehabilitation needs. Preservation of the physical and functional integrity of existing housing units occupied by low- and moderate-income households is a cost-effective way to invest limited resources to retain housing units that are already affordable to low- and moderate-income households in the community. Addressing

substandard housing conditions through housing preservation activities provide that all economic segments of the community have the means to ensure that their property meets local standards and that all Rancho Cucamonga residents have the opportunity to live in decent housing.

This year, 25 new housing rehabilitations were completed utilizing CDBG funds. The current design of the City's Home Improvement Program encountered some limitations with respect to the award amounts originally outlined in the program guidelines. As such, the City has redesigned the program to consider the current market value of home repairs and contractor rates.

In addition, the City continues to address affordable housing needs via its participation in the County Consortium and through fair housing services to ensure equal access to housing opportunities for low- and moderate-income people.

Discuss how these outcomes will impact future annual action plans.

The 2015-2019 Consolidated Plan identified a high priority need for affordable housing. During the 2019-2020 program year, the City of Rancho Cucamonga invested CDBG funds towards the Home Improvement Program for the rehabilitation of existing housing.

In future Action Plans, the City anticipates continuing to invest CDBG funds to address the rehabilitation of existing substandard housing. As noted above, the scope of the Home Improvement Program has been redesigned to accommodate various home repairs. As community needs change the City may need to undertake additional activities to best achieve the City's ability to meet its affordable housing goals. All future Annual Action Plans will need to provide additional information on any on-going affordable housing activities and the City will continue to assess and determine affordable housing needs that best utilize available funding sources.

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

Table 7 - Number of Households Served

Number of Households Served	CDBG Actual
Extremely Low-income	4
Low-income	10
Moderate-income	11
Total	25

Narrative Information

Affordable housing was identified as a high priority need in the 2015-2019 Consolidated Plan and Strategic Plan goals were established to provide the framework necessary to invest CDBG funds to address affordable housing needs which includes the rehabilitation of existing homes. During the 2019-2020 program year, the City home improvement program completed 25 housing units in the reporting period.

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

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

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

To address incidences of homelessness in Rancho Cucamonga and to prevent extremely low-income Rancho Cucamonga families from becoming homeless, the City places a high priority on programs that work to prevent homelessness or rapidly connect homeless individuals with housing and supportive services. To address this need, the City has supported a continuum of services in the City of Rancho Cucamonga through the San Bernardino County Continuum of Care (CoC) to prevent and eliminate homelessness; including, but not limited to, homelessness prevention programs, emergency shelter programs and transitional housing.

On January 23, 2020, the San Bernardino Homeless Partnership conducted its 2020 Point-in-Time Homeless Count (PIT Count) and found that there were 3,125 homeless persons in the County. This represented a 19.9 percent increase County wide in the number of homeless persons over the previous year. Of that amount, the number of homeless in Rancho Cucamonga was 58 persons. This represents a 9.4 percent decrease over the prior year of 64 homeless persons. These figures do not include the homeless who have been displaced due to the COVID-19 pandemic and economic downturn.

The City continues referring clients to SBCHP for support and uses the agency's resource guides to direct homeless residents to services in the area. In addition, the City continues to provide and partner with public service providers to provide a variety of programs to those who are homeless or at-risk of becoming homeless.

Addressing the emergency shelter and transitional housing needs of homeless persons

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

As part of the City's 2013-2021 Housing Element, the City adopted zoning provisions to facilitate the development of transitional and emergency housing consistent with State law. Within the City of Rancho Cucamonga transitional housing is permitted in all residential land use districts and emergency shelters are permitted in the General Commercial (GC) land use district and conditionally permitted in the General Industrial (GI) land use district. Although the City does not operate transitional housing or emergency shelters directly, the City's CDBG program supports various public service agencies that provide emergency shelter and transitional housing needs for the community.

Helping low-income individuals and families avoid becoming homeless, especially extremely low-income individuals and families and those who are: likely to become homeless after being discharged from publicly funded institutions and systems of care (such as health care facilities, mental health facilities, foster care and other youth facilities, and corrections programs and institutions); and, receiving assistance from public or private agencies that address housing, health, social services, employment, education, or youth needs

An individual or family is considered to be at-risk of becoming homeless if it experiences extreme difficulty maintaining their housing and has no reasonable alternatives for obtaining subsequent housing. Homelessness often results from a complex set of circumstances that require people to choose between food, shelter, and

other basic needs. Examples of common circumstances that can cause homelessness include eviction, loss of income, insufficient income, disability, increase in the cost of housing, discharge from an institution, irreparable damage or deterioration to housing, and fleeing from family violence.

During Program Year 2019-2020, the City connected chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth with available resources through the San Bernardino County CoC, which is comprised of a network of public, private, faith-based, for-profit, and non-profit service providers who utilize several federal, state and local resources to provide services for homeless people. The goal was to help unsheltered homeless persons make the transition to permanent housing and independent living, including shortening the period that individuals and families experience homelessness, facilitating access for homeless individuals and families to affordable housing units.

Additionally, the City of Rancho Cucamonga funds the Inland Fair Housing and Mediation Board to provide fair housing, tenant/landlord mediation and legal services for residents through attorney consultations and preparation of legal documents for the residents to represent themselves in family law and landlord/tenant actions. Some of these services are provided to prevent undue evictions that could lead to homelessness.

The Housing Authority of the County of San Bernardino provides Section 8 rental assistance to extremely low- and very low-income households located within the City limits. The Section 8 program gives priority to households that are at risk of becoming homeless or currently residing in inadequate 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 San Bernardino County CoC Ten-Year Plan to End Homelessness included a goal to more rapidly identify and assess people experiencing homelessness. The CoC is working with 2-1-1 to create a Coordinated Entry Systems (CES) for persons at risk or experiencing homelessness within the CoC. The activities include street outreach, a universal assessment, intake, referrals and transportation to resources. The CES will include a database, housed in the Homeless Management Information System (HMIS), using real time data entry to match clients to appropriate service providers. Collectively these strategies minimize duplication of effort and better connect the most vulnerable individuals and families, chronically homeless, and people at risk of becoming homeless to appropriate resources.

In addition, the City has a Mobile Home Rental Assistance Program to assist persons who are low-income and at risk of becoming homeless.

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

Actions taken to address the needs of public housing

The City of Rancho Cucamonga is within the service area of the Housing Authority of the County of San Bernardino (HACSB) for the purposes of Section 8 and Public Housing. In recognition that the U.S. Census Bureau projects that the elderly in California will have an overall increase of 112 percent from 1990 to 2020, the HACSB is working on making changes to address the need for the growing senior population.

The data presented below is for HACSB and the narrative questions address the needs for the entire county, with specific references to the City of Rancho Cucamonga. Countywide, HACSB currently manages and operates 99 public housing units. HACSB owns 2,105 additional units, is in a limited liability partnership for 778 units and has 1,371 units in its portfolio with Housing Partners I, Inc. The HACSB manages 10,821 Section 8 vouchers, the majority of which are tenant-based vouchers. According to HACSB's 2018 Annual Report, there are 315 Section 8 vouchers currently in use in Rancho Cucamonga. In addition, there are six units that are part of the Housing Partners I, Inc.'s portfolio. There is still a great need in Rancho Cucamonga for additional subsidized housing with various applications from Rancho Cucamonga families on the waiting list. In the upcoming five years, HACSB plans to focus efforts on rehabilitating and preserving existing housing units and continuing existing programs and activities.

Additionally, private development with funding assistance from the Rancho Cucamonga Housing Successor Agency and tax credit financing through the California Tax Allocation Committee provided for Villa Pacifica II expansion of 60 senior apartments in May of 2019 and the Day Creek Villas of 140 senior apartments which have been completed in October of 2020.

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

The HACSB supports resident councils and actively seeks input from Public Housing Authority (PHA) residents on the management and implementation of HACSB policies and procedures. HACSB and the City of Rancho Cucamonga also continue to actively encourage and promote public housing residents to explore homeownership opportunities and programs through HACSB's Homeownership Assistance Program targeted at current PHA residents. HACSB also encourages and supports residents in participating in homebuyer counseling programs and recommends residents use the family self-sufficiency escrow account to save money towards homeownership.

As of December 2017, HACSB's Homeownership program is the second largest in the state by the number of families participating in the program and is 31st nationwide among nearly 700 agencies with homeownership programs.

Actions taken to provide assistance to troubled PHAs

Not applicable. The HACSB is designated as a High Performing Public Housing Agency.

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)

A barrier to affordable housing is a public policy or nongovernmental condition that constrains the development or rehabilitation of affordable housing, such as land use controls, property taxes, state prevailing wage requirements, environmental protection, cost of land and availability of monetary resources. Barriers to affordable housing are distinguished from impediments to fair housing choice in the sense that barriers are lawful and impediments to fair housing choice are usually unlawful.

Based on the City's 2013-2021 Housing Element, the primary barriers to affordable housing in Rancho Cucamonga continue to be housing affordability and the lack of monetary resources necessary to develop and sustain affordable housing. The two barriers are related in the sense that demand for affordable housing exceeds the supply and insufficient resources are available to increase the supply of affordable housing to meet demand.

In the last seven years, the elimination of local Redevelopment Agencies by the State of California resulted in the loss of a crucial resource for the development and preservation of affordable housing. This was the most significant public policy change impacting affordable housing and residential investment. While there are mechanisms whereby certain affordable housing assets tied to the former Redevelopment Agencies may be utilized today, these resources are finite and scarce. Although the City no longer has access to Redevelopment Housing Set-Aside funds, the City will continue to leverage its CDBG funds to attract private and other available public resources.

Additionally, to address housing affordability and the lack of monetary resources for affordable housing, the City has modified its Accessory Dwelling Units (ADU) ordinances to allow for an increase in affordable housing units while simultaneously restricting them from being used as short-term rental properties. To date, this has resulted in 21 new affordable units. Moreover, the City is in the process of updating its General Plan, which will consider the various obstacles and barriers to entry resulting from public policies, to ameliorate those negative effects thereby increasing the supply of affordable housing and preserving existing affordable housing in the City. In the last seven years, the elimination of local redevelopment Agencies by the State of California resulted in the loss of a crucial resource for the development and preservation of affordable housing. This was the most significant public policy change impacting affordable housing and residential investment. While there are mechanisms whereby certain affordable housing assets tied to the former Redevelopment Agencies may be utilized today, these resources are finite and scarce. Although the City no longer has access to Redevelopment Housing Set-Aside funds, the City will continue to leverage its CDBG funds to attract private and other available public resources to facilitate affordable housing development. This strategy will increase the supply of affordable housing and preserve existing affordable housing in the City.

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

The primary obstacles to meeting the underserved needs of low- and moderate-income people include lack of funding from federal, state and other local sources, the high cost of housing that is not affordable to low income people, and the lack of availability of home improvement financing in the private lending industry.

To address these obstacles, the City continued to invest CDBG funds through the 2019-2020 Action Plan in

projects that provide assistance to low- and moderate-income homeowners for home improvements, projects that provide public and neighborhood services to low- and moderate-income people and projects that prevent homelessness. To address underserved needs, the City allocated 100 percent of its non-administrative CDBG investments for Program Year 2019-2020 to projects and activities that benefit low- and moderate-income people.

The City used its CDBG funds to leverage appropriate state, local, and private resources secured by each non-profit organization providing public services. In addition, the City will seek to leverage other sources of federal, state, and local resources to compliment CDBG funds in order to meet the underserved needs in the community.

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 rehabilitation of housing units built prior to January 1, 1978 included a lead-based paint testing and risk assessment process. When lead-based paint was identified, the City ensured that developers and contractors incorporate safe work practices and depending on the level of assistance, abate the lead-based paint as part of the scope of work to effectively reduce lead-based paint hazards to children in accordance with 24 CFR Part 35.

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 2015-2019 Consolidated Plan-Strategic Plan and this Annual Action Plan helped to reduce the number of poverty-level families by:

- Supporting activities that preserve the supply of safe and decent housing that is affordable to low- and moderate-income households such as the Home Improvement Program;
- Supporting a continuum of housing and public service programs to prevent and eliminate homelessness;
- Supporting public services through various nonprofit organizations funded by CDBG that serve the community's youth, seniors, and families.

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

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

The institutional delivery system in Rancho Cucamonga is high-functioning and collaborative—particularly the relationship between local government and the nonprofit sector comprised of a network of capable nonprofit organizations that are delivering a full range of services to residents. Strong City departments anchor the administration of HUD grant programs and the housing, community and economic development activities that

are implemented by the City.

In order to support and enhance the existing institutional structure, the City of Rancho Cucamonga continues to collaborate with nonprofit agencies receiving CDBG funds through the 2019-2020 Action Plan to ensure that the needs of low- and moderate-income residents were met as envisioned within the 2015-2019 Consolidated Plan – Strategic Plan.

The City also participates in the County Inter-agency Council on homelessness which is a group that was created by the County Housing Authority. This coordination provides the City with valuable insight into the homelessness issue as well as the various measures being taken to address the problem. Additionally, in working with the City's Critical Case Task Force, which assesses high-risk and red tagged homes, it has allowed the City to rehabilitate homes that are the most in need. The City will continue to participate with these organizations and look to further enhance cooperation with agencies and local groups.

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

To enhance coordination between public and private housing and social service agencies, the City invested CDBG funds and will continue consulting with and inviting the participation of a wide variety of agencies and organizations involved in the delivery of housing and supportive services to low- and moderate-income residents in Rancho Cucamonga.

Representatives of the City participate in the San Bernardino Consortium. Additionally, City staff regularly participated in neighborhood meetings during the program year to coordinate the efforts of local organizations that are working in neighborhoods to address poverty through direct community engagement.

In years prior the City utilized set-aside Redevelopment funds to develop affordable apartment complex in partnership with National CORE. The National CORE After-School and Beyond activity, which was funded using CDBG dollars, takes place in that same community to ensure public services are made available to low- and moderate-income youth.

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 following impediments to fair housing choice were identified in the City's Analysis of Impediments:

- **DEVELOPMENT CODE CHANGES:** The 2012 Development Code update revised the City's requirements for emergency shelters, transitional housing, and supportive housing. Emergency Shelters are permitted by right in the General Commercial land use district. Transitional and Supportive Housing is permitted as a residential use in all zones that allow residential land uses and only subject to those restrictions that apply to other residential dwellings of the same type in the same zone.
- **REASONABLE ACCOMMODATION:** The 2012 Development Code Update established procedures for reasonable accommodations. The purpose is to provide reasonable accommodations to explicitly allow for changes to land use, building codes, development code requirements (i.e., setback reductions and parking requirements), and permitting processes to accommodate people with disabilities.
- **PERMITTING PROCESSES:** There have been no changes to the permitting process to report.
- **PERMITTING PROCESSES:** There have been no changes to the permitting process to report.
- **SENIOR HOUSING OVERLAY:** The 2012 Development Code update did not change marital status

age restriction.

- **TRANSIT SERVICE:** The City continues to work with Omnitrans to evaluate bus routes within the City so that the route adjustments can be incorporated into the next short-range transportation plan update.
- **FAIR HOUSING COMPLAINTS:** The City continues to partner with Inland Fair Housing and Mediation Board to provide Fair Housing services to the citizens of Rancho Cucamonga and will continue to work with them to adjust their public education programs as needed.
- **FAIR LENDING PRACTICES:** Fair lending practices are reviewed by Inland Fair Housing and Mediation Board and are reported annually to the City.
- **HATE CRIMES:** The San Bernardino County Sheriff's Department maintains hate crime records for the City. We continue to work the Sheriff's Department to ensure that crimes are accurately reported.
- **SCHOOL VIOLENCE:** The City continues to work with the Sheriff's Department to address issues and opportunities relating to school violence.
- **RECORDKEEPING:** The City's CDBG program requires that Subrecipients maintain data for four (4) years following the completion of the program year. All relevant records and data is maintained by each Subrecipient and is available for review following reasonable and appropriate notice.

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

To ensure that CDBG funds are used efficiently and in compliance with applicable regulations, the City provides technical assistance to all subrecipients at the beginning of each program year and monitors subrecipients throughout the program year.

Technical Assistance

To enhance compliance with federal program regulations the City made technical assistance available to prospective applicants for CDBG Notice of Funding Availability (NOFA) upon request to review the Strategic Plan goals, program requirements and made available resources with potential applicants. Subsequent to the approval of the Annual Action Plan, individualized technical assistance was provided on an as-needed basis throughout the program year.

Activity Monitoring

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

Subrecipients are required to submit an audit and other documentation to establish their capacity, and any findings noted in the audit are reviewed with the applicant. Eligible applicants are then considered for funding. Once funded, desk monitoring includes ongoing review of required quarterly performance reports.

For CDBG public service activities, an on-site monitoring is conducted at least once every two years, or more frequently as needed to ensure compliance. These reviews include both a fiscal and programmatic review of the subrecipient's activities. The reviews determine if the subrecipient is complying with the program regulations and City contract. Areas routinely reviewed include overall administration, financial systems, appropriateness of program expenditures, program delivery, client eligibility determination and documentation, reporting systems, and achievement toward achieving contractual goals. Following the monitoring visit, a written report is provided delineating the results of the review and any findings of non-compliance and the required corrective action. Subrecipients normally have 30 days to provide the City with corrective actions taken to address any noted findings. Individualized technical assistance is provided, as noted above, as soon as compliance concerns are identified. For CDBG capital projects, monitoring also includes compliance with regulatory agreement requirements.

Due to the public health concerns related to COVID-19, no on-site monitorings were conducted of any subrecipients. The City will continue to conduct quarterly desk monitorings of all subrecipients and search for alternative avenues that may facilitate the on-site monitoring occurring remotely for the duration of the pandemic.

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

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

In accordance with the City's adopted Citizen Participation Plan, a public notice was published in the Inland Valley Daily Bulletin on November 26, 2020 notifying the public of the availability of the Consolidated Annual Performance and Evaluation Report for a 15-day public review and comment period beginning December 1, 2020 and ending December 16, 2020. A copy of the public notice is included in Appendix A.

Due to the public health concerns related to COVID-19, City Hall is closed to the public and as such the draft CAPER was available on the City website.

City Website

<https://www.cityofrc.us/housingresources>

A public hearing will be conducted before the City Council on Wednesday, December 16, 2020 to solicit comments from residents and interested parties. A summary of any written or oral comments received during the public hearing will be included in Appendix B of the final CAPER document.

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.

To respond to the impacts related to the coronavirus pandemic, The City of Rancho Cucamonga amended its PY2015-2019 Consolidated Plan and PY2019-2020 Annual Action Plan to add COVID-19 Response to its strategic plan. It is anticipated that the Community Development Block Grant-Coronavirus (CDBG-CV) funding will be used to pursue this strategy.

Still, CDBG funds are making a significant impact on strategies to address high priority needs identified in the 2015-2019 Consolidated Plan Strategic Plan. As shown in Figure 1 in section CR-05 of this document, CDBG funds contributed to five of six Strategic Plan goals including Affirmatively Further Fair Housing Choice, Homelessness and At-Risk of Homelessness, Improve Public Facilities and Infrastructure, Public Services and Rehabilitation of Existing Housing.