



CITY OF SAN CLEMENTE

2017-2018 CONSOLIDATED ANNUAL PERFORMANCE & EVALUATION REPORT

Draft August 30, 2018

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Attachments

Attachment 1: Public Notice and summary of public comments

Attachment 2: Map of San Clemente CDBG Target Areas

Attachment 3: Summary of Fair Housing Impediments and Actions to Address Impediments

Attachment 4: IDIS Reports:

- PR03: CDBG Activity Summary Report (GPR) for Program Year 2017
- PR06: Summary of Consolidated Plan Projects for Report Year
- PR26: CDBG Financial Summary Report 2017

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 San Clemente is a recipient of Community Development Block Grant (CDBG) funds from the U.S. Department of Housing and Urban Development (HUD). CDBG funds may be used for a variety of activities provided the majority of beneficiaries meet HUD's definition of a low- and moderate-income individual. To receive CDBG funds, the City is required to prepare a strategic plan that identifies housing and community needs, prioritizes needs, and identifies programs and goals to address priority needs. This strategic plan is known as the Consolidated Plan. The Current Consolidated Plan was approved by the City Council in June 2016 for the four-year period of Fiscal Year (FY) 2016-2017 through FY 2019-2020. On an annual basis, the City prepares an expenditure plan (the Annual Action Plan) that lists specific activities the City will carry out with CDBG funds and that meet the housing and community needs identified in the Consolidated Plan. At the end of each fiscal year, the City is required to prepare an accomplishment report. This report is known as the Consolidated Annual Performance and Evaluation Report or CAPER. In addition to comparing planned versus actual accomplishments for the respective fiscal year, the CAPER also tracks the City's progress toward meeting the four-year goals established in the Consolidated Plan.

The 2017-2018 CAPER provides a summary of the CDBG-funded activities undertaken by the City during the period of July 1, 2017, through June 30, 2018 (FY 2017-18). FY 2017-18 is the second year of the four years covered by the current Consolidated Plan. Accomplishment highlights for the year include the following:

- Rehabilitation assistance was provided to one lower income homeowner.
- Over 3,000 lower income residents were assisted with a variety of safety net social service programs such as reduced cost medical services, youth recreation programs, counseling for victims of domestic violence, case management for homebound seniors, and housing and support services for the homeless.
- Construction of sidewalks benefitting residential neighborhoods (1 project pending during the report period).
- Fair housing counseling and services for tenants, landlords and property owners.
- Upgrading of business signs for commercial ventures serving CDBG target areas.

Finally, the Orange County Housing Authority (OCHA) reports that it assisted 154 San Clemente renter households with a rental assistance voucher or certificate during the report period (as of 4/31/18).

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 lists the goals, categories, funding sources and amounts, goal outcome indicators, and targets/actual outcomes/outputs and percentage completed for the four-year Consolidated Plan period and for FY 20116-17 (Year 1 of the Consolidated Plan).

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

Goal	Category	Source / Amount	Indicator	Unit of Measure	Expected 4 Yr. Strategic Plan	Actual 4 Yr. Strategic Plan	Percent Complete 4 Yr.	Expected Program Yr. 2	Actual Program Yr. 2	Percent Complete Program Yr. 2
Affordable Housing Development	Affordable Housing	CDBG: \$0	Rental units constructed	Household Housing Unit	1	0	0.00%	0	0	NA
Commercial Rehabilitation	Non-Housing Community Development	CDBG: \$1,484	Businesses assisted	Businesses Assisted	20	2	10.00%	7	1	14.29%
Fair Housing Services	Administration	CDBG: \$4,500	Other	Other	400	121	30.25%	80	53	66.25%
Program Administration	Administration	CDBG: \$38,908	Other	Other	4	2	50.00%	1	1	100.00%
Public Facility Improvements	Non-Housing Community Development	CDBG: \$0	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit	Persons Assisted	5,000	1,965	39.30%	0	0	0.00%

Goal	Category	Source / Amount	Indicator	Unit of Measure	Expected 4 Yr. Strategic Plan	Actual 4 Yr. Strategic Plan	Percent Complete 4 Yr.	Expected Program Yr. 2	Actual Program Yr. 2	Percent Complete Program Yr. 2
Public Infrastructure Improvements	Non-Housing Community Development	CDBG: \$164	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit	Persons Assisted	10,000	4,120	41.20%	2,900	0	0.00%
Public Services	Non-Housing Community Development	CDBG: \$41,750 ¹	Public service activities other than Low/Moderate Income Housing Benefit	Persons Assisted	10,000	5,846	58.46%	2,378	2,956	124.31%
Public Services	Non-Housing Community Development	CDBG: \$11,690 ²	Homeless Person Overnight Shelter	Persons Assisted	25	137 ³	548.00%	230	119	51.74%
Rental Housing Rehab	Affordable Housing	CDBG: \$0	Rental units rehabilitated	Household Housing Unit	4	0	0.00%	1	0	0.00%
Single Family Housing Rehab	Affordable Housing	CDBG: \$44,598	Homeowner Housing Rehabilitated	Household Housing Unit	20	3	15.00%	4	1	25.00%

1. Amount includes funds allocated for Camino Health Center, Fun on the Run, and Laura's House.

2. Amount equals funds allocated to Family Assistance Ministries.

3. Figure includes 18 individuals assisted by Laura's House with transitional housing in FY 16/17 – these 18 were also included in FY 16/17 non-Overnight Shelter persons assisted total.

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.

As summarized in Table 1, the City used CDBG funds to address the priority needs identified in the Consolidated Plan including safety net programs for lower income households:

- Camino Health Center provided reduced cost medical and pediatric dental care services for lower income households, including the uninsured and the homeless – 2,595 lower income individuals were served during the report period.
- Fun On The Run, a City-sponsored program, provided after school and summer youth recreation services for low- and moderate-income youth – 155 youths were served during the report period.
- Laura’s House provided a variety of support services for victims of domestic violence including a 24-hour hotline, referrals, and safe house planning including transitional housing – 223 individuals were served during the report period.
- Family Assistance Ministries provided a continuum of housing and service options for households at risk of becoming homeless and those already homeless – 102 individuals were assisted during the report period.
- The Fair Housing Foundation (FHF) provided a variety of services aimed at overcoming impediments to accessing safe and decent housing. FHF provided outreach, education and enforcement service for tenants, landlords and property managers - 53 households were served during the report period.
- Grants to local entrepreneurs were available to update signs and other minor exterior building improvements – one business was assisted during the report period.

To address priority housing needs, the City offered housing rehabilitation assistance to qualified homeowners and rental property owners. The program aims to preserve and improve the City’s existing housing stock. During the report period, housing rehabilitation assistance was provided to one homeowner. Improvements undertaken typically include the installation of new energy efficient windows, termite treatment, installation of new hot water heaters, and other housing health and safety improvements. As indicated above, the Orange County Housing Authority (OCHA) provided rental assistance to 154 San Clemente renter households.

With respect to public infrastructure and facility improvement priorities, CDBG funding was allocated for the construction of sidewalks, curbs and ADA-compliant ramps at the 100 block of West Avenida Palizada. The project was originally funded for \$200,000 as part of a Substantial Amendment to the 2016 Annual Action Plan which was approved by the City Council in November 2016, and submitted to HUD in December 2016. Due to higher than anticipated construction costs, \$240,000 in additional CDBG funding was allocated to the project in the 2017-2018 Annual Action Plan. It is anticipated that design and engineering for the project will be completed by September 2018, with a construction contract awarded in November 2018, and construction completed by May 2019.

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

	CDBG
White	2,907
Black or African American	38
Asian	56
American Indian or American Native	9
Native Hawaiian or Other Pacific Islander	9
Total	3,019
Hispanic	1,464
Not Hispanic	1,555

* This default IDIS table excludes multi-racial program beneficiaries – 57 additional individuals (18 of which were Hispanic) were also assisted during the report period.

Narrative

According to the U.S. Census Bureau, the majority of San Clemente residents are racially White – 80.5% per the *2012-2016 American Community Survey 5-Year Estimates*. This same data source reports that 18.3% of the City’s population is Hispanic/Latino – the City’s largest minority population.

Based on the data from Table 2, approximately 96% of program participants were White, and 49% of these individuals reported to be ethnically Hispanic/Latino. A closer look at the accomplishment data from individual activities provides added insight. Among safety net programs such as medical care and youth services, the majority of clients served were lower income Hispanic/Latino households (50% and 64% respectively). While data from the Consolidated Plan indicates no one San Clemente minority population is disproportionately significantly housing cost burdened (i.e., household paying more than 50% of monthly income for housing), data from Table 2 seems to indicate that some minority households may be economically unstable and seek out services in hopes of stabilizing their economic situation.

CR-15 - Resources and Investments 91.520(a)

Identify the resources made available

Table 3 - Resources Made Available

Source of Funds	Source	Resources Made Available	Amount Expended During Program Year
CDBG	CDBG	\$436,291	\$143,094

Narrative

According to the City's 2017-18 Annual Action Plan, the City anticipated utilizing \$436,291 in CDBG program resources comprised of its 2017 CDBG Annual Allocation of \$356,291, plus \$80,000 in Prior Year Funds. The City did not anticipate receiving CDBG Program Income funds (i.e., Revolving Loan funds generated by the repayment of prior CDBG-funded housing rehabilitation loans) during the report period.

During the report period, the City received its 2017 CDBG grant of \$356,291, and had access to \$80,000 in prior year funds. The City did receive \$20,328 in program income.

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
CDBG Census Tracts	58	0.5	Census Tract Block Groups identified by HUD as eligible for CDBG-funded activities
Citywide	42	95.5	Citywide program or activity

Narrative

Table 4 indicates a very small percentage (0.5%) of available CDBG resources were used in CDBG-eligible Census Tracts during the report period. This is primarily due the lack of spending on the Avenida Palizada sidewalk project. A map of the City's CDBG eligible areas is provided as **Attachment 2**.

All CDBG-funded public service grants were available on a citywide basis. Similarly, housing rehabilitation assistance was available citywide.

Leveraging

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

The City of San Clemente made an effort to leverage CDBG funds to the greatest extent possible. Approximately \$64,000 in other resources was used to leverage federal funds during the 2017-18 report period. These sources included the following:

- Good Neighbor Grants (City funded social service programs): \$64,000

There is no match requirement for the CDBG program.

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	4	1
Number of Special-Needs households to be provided affordable housing units	0	0
Total	4	1

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 the rehab of existing units	4	1
Number of households supported through the acquisition of existing units	0	0
Total	4	1

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

The City did not meet planned housing rehabilitation program goals for the 2017-18 report period. The 2017-2018 Annual Action Plan set a one-year goal to rehabilitate five housing units (four single-family units and one rental units). During the report period, program staff initiated the rehabilitation of one unit. The low accomplishment rate is attributed to several factors including issues such as the lack of a clean property title report, properties encumbered by a reverse mortgage, applications submitted by over-income property owners, and applicants not submitting required documentation for loan underwriting.

Discuss how these outcomes will impact future annual action plans.

During the FY 2016-17 report period, the City undertook a comprehensive re-writing of the City's housing rehabilitation program. While the revised program policies and procedures were necessary to

ensure program participant eligibility and proper underwriting (to protect the public’s investment), some program streamlining remains necessary. Additionally, with additional funding in 2018, program staff will explore new means to market the program in order to increase participation.

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	HOME Actual
Extremely Low-income	0	0
Low-income	1	0
Moderate-income	0	0
Total	1	0

Narrative Information

Table 7 provides information regarding the households that received housing rehabilitation assistance during FY 2017-18. OCHA reports that 154 very low-income and extremely low-income San Clemente households received rental assistance during the 2017-18 report period. The City is not a recipient of HOME funds.

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

No CDBG funds were allocated during the 2017-18 report period for homeless outreach; however, the Orange County Sheriff and regional homeless service providers such as Family Assistance Ministries (FAM), have established outreach programs that engage the homeless in south Orange County. In addition to supporting these efforts by endorsing the coordinated efforts of the regional Continuum of Care and its outreach and assessment strategy, the City provided \$22,000 in general fund resources (Good Neighbor Grant) to support FAM's continuum of homeless services.

Addressing the emergency shelter and transitional housing needs of homeless persons

During the 2017-18 report period, the City allocated CDBG funds to Family Assistance Ministries to provide a continuum of housing opportunities for homeless individuals. During the report period, 31 individuals received emergency shelter and support services. CDBG funding for Laura's House was utilized to provide transitional housing opportunities for 17 victims of domestic violence. Additionally, FAM provided transitional housing for three individuals.

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

The City's homeless strategy delineated in the Consolidated Plan calls for providing safety net services that help prevent individuals and families from becoming homeless. To this end, during the 2017-18 report period, CDBG funding was allocated to Camino Health Center and Fun On The Run. Respectively, these programs provided reduced cost medical/dental and childcare services to lower income households, which allowed these individuals to redirect limited financial resources to stay housed.

FAM utilized CDBG funds to pay for a portion of housing cost to prevent eviction - 65 individuals benefited from this type of assistance. OCHA reports that six homeless households received Continuum of Care Program Permanent Supportive Housing Certificates, and four homeless veterans received Veterans Affairs Supportive Housing (VASH) vouchers.

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

During the 2017-18 report period, no CDBG funding was allocated to specifically fund permanent housing activities for homeless persons; however, FAM provide rapid rehousing assistance to three San Clemente residents. In addition to housing assistance, a variety of supportive services were also made available to program participants in an effort to ensure long-term housing stability.

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

Actions taken to address the needs of public housing

The City of San Clemente does not own or manage public housing.

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

Not applicable

Actions taken to provide assistance to troubled PHAs

Not applicable

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)

The 2017-2018 Annual Action Plan indicated that the City will address barriers to affordable housing by considering the following actions:

- **Housing Resources:** Inclusionary Housing in-lieu fees were available to assist nonprofit agencies purchase land or existing housing units to create long-term affordable housing opportunities.
- **Environmental Review:** City staff was available to assist property owners and developers navigate environmental review regulations to help reduce holding cost associated with the time needed to comply with environmental reviews.
- **Planning and Development Fees:** The City typically does not offer fee waivers; however, the City Council can approve a waiver, offer deferred or reduced fees, or supplement fees with public funds for affordable housing projects.
- **Permit and Processing Procedures:** For affordable housing project, City staff is available to interact with project sponsors early in the process to help determine project feasibility and to guide a developer through the entitlement process.
- **Land Use Controls:** In general, land use controls are necessary to protect the public health, safety and welfare and maintain the quality of life. The City has implemented reasonable controls which are appropriate for the community.
- **Tax Policies:** There is no local tax.

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

The City recognizes that special needs populations face challenges due to low income and the special needs conditions that they face. Such individuals are more likely to become homeless because of these factors. Special needs populations require housing and supportive services. The City considers supportive services and housing for special needs populations as a priority. Supportive services are also considered a high priority in the Continuum of Care of Orange County. During FY 2017-18 the City funded public service agencies that provide a social safety net to help at risk households. Services included access to reduced health care and youth recreation services. Other special needs service funded during the report period include counseling for victims of domestic violence and professional case management for home-bound adults.

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

The Residential Lead-Based Paint (LBP) Hazard Reduction Act of 1992 (Title X) changed the federal approach to addressing LBP by increasing the emphasis on prevention of childhood lead poisoning

through housing based approaches. The City has included lead-based paint hazard reduction as an eligible activity in the City's housing rehabilitation programs.

All application packets for the City's housing rehabilitation programs include a notice to educate residents about the health dangers of lead and encourages screening of children for elevated blood-lead levels. Additionally, prior to the use of federal funds, all existing units are screened for lead-based paint if applicable. Housing units identified as having lead-based paint hazards are treated so the lead-based paint hazards are abated in accordance with federal requirements. The use of lead-based paint is prohibited in newly constructed units. The one housing unit rehabilitated during FY 2017-18 was constructed before 1978 but tested free of lead-based hazards. The City's housing rehabilitation program is designed to ensure safe work practices, as dictated by HUD, are implemented to address the lead-paint hazards.

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

According to the U.S. Census Bureau, approximately 7.1% of San Clemente residents have incomes below the poverty level, this figure includes approximately 5.5% of City residents age 65 and older and 7.9% of children under the age of 18.^[1] The Consolidated Plan and Annual Action Plan indicated that the City will support social services and housing activities for households below the poverty line in recognition that income enhancement services are necessary to increase household incomes.

During the 2017-18 report period, the City provided funding to the Fun On The Run recreation program for low- and moderate-income youth. The program offers professionally supervised, free or reduced cost youth recreation activities that accommodates the schedule of working parents. Recognizing that poverty-level households may need assistance affording health care, the City provided funding for Camino Health Center, which provided reduced cost medical and pediatric dental services for lower income San Clemente residents.

[1.] POVERTY STATUS IN THE PAST 12 MONTHS, 2011-2015 American Community Survey 5-Year Estimates, S1701.

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

During FY 2017-18, the City continued efforts to eliminate institutional gaps and enhance coordination of programs with all segments of the community. For example, the City partnered with nonprofits to deliver public services. City departments also continued to work together to evaluate projects that may be funded in whole or in part with CDBG funds that address priority needs. The City assisted OCHA by participating in the Cities Advisory Committee – a quarterly meeting of cities and OCHA to discuss issues related to federal rental housing assistance and regional housing issues. As a member of the Orange County Continuum of Care Community Forum, the City provided critical information to the regional Continuum of Care (CoC) as it prepared the County's CoC Homeless Assistance grant application for HUD consideration. The City also provided input on the development of the County's Ten-Year Plan to end chronic homelessness and the regional discharge plan.

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

As indicated above, the City participated in regional coordination of services by participating in the quarterly Cities Advisory Committee held by OCHA to discuss issues related to federal rental housing assistance, and as a member of the Orange County CoC Forum. Through its CDBG and general fund grant programs, the City has coordinated the delivery of social services to the community that address a variety of needs.

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

Consolidated Plan regulations requires CDBG recipients to: (1) examine and attempt to alleviate housing discrimination within their jurisdiction; (2) promote fair housing choice for all persons; (3) provide opportunities for all persons to reside in any given housing development, regardless of race, color, religion, sex, disability, familial status, or national origin; (4) promote housing that is accessible to and usable by persons with disabilities; (5) and comply with the non-discrimination requirements of the Fair Housing Act. HUD encourages jurisdictions to consult with one another and initiate metropolitan wide area fair housing planning. The **Analysis of Impediments (AI) to Fair Housing Choice** is the primary document utilized for this purpose.

Consistent with HUD's directive, the City partnered with 15 Orange County jurisdictions to prepare an updated AI in 2015, which provided a summary of fair housing impediments and the actions to be taken by the City to address impediments.

During the 2017-18 report period, the City funded the Fair Housing Foundation (FHF), which provided fair housing services to City residents, including low- and moderate-income and special needs populations. Services provided by FHF included outreach, education, and fair housing enforcement. A total of 53 households were assisted during the report period. The majority of households served were White Non-Latino (85%). Approximately 13% of households served were White-Latinos, and 2% Pacific Islanders. Approximately 70% of households served were low- and moderate-income.

With respect to services provided, six fair housing discrimination allegations were received by FHF. Complaints alleged housing discrimination based on physical disability (4 claims), mental disability (1 claim), and familial status (1 claim). Four of the allegations were resolved through counseling, and two cases were opened for further action. With respect to the latter, no evidence was found to sustain the housing discrimination claim in one case; however, the allegations based on physical disability was sustained in the second case. FHF staff was able to successfully resolve this case. FHF staff also provided services to address 61 housing issues dealing with habitability, notices, and accommodation modifications. With respect to outreach and education, FHF held fair housing workshops for landlords, tenants, property managers. FHF staff also held one fair housing walk-in clinic in the City, attended community events, and distributed over 2,000 pieces of fair housing literature throughout the City. Additional information regarding the AI and 2017-18 action is summarized in **Attachment 3**.

CR-40 - Monitoring 91.220 and 91.230

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

The City's on-site monitoring program has been designed to provide program staff with information to verify the accuracy of data provided by subrecipients, ensure that subrecipients are carrying out individual activities as described in their contracts, and to ensure that appropriate accounting and record keeping methods are used by subrecipients as it relates to the use of CDBG funds. New CDBG program policies drafted during the 2016-17 report period will ensure subrecipients receive training regarding CDBG grant management including the following topics: 1) review the CDBG program goals, objectives and subrecipient obligations; 2) review the content of the subrecipient agreements; and, 3) review regulations related to the CDBG program that impact subrecipients in the implementation of their programs.

On-site monitoring of subrecipients is conducted biennially unless program or administrative issues are identified or the grant recipient is new to CDBG. The City conduct an on-site monitoring of all subrecipients during the 2017-18 report period. There were no significant findings resulting from this monitoring.

During the report period, program staff also worked closely with other City departments to ensure CDBG program regulations and other federal requirements were implemented. City departments and public service grant subrecipients submitted quarterly accomplishment reports. Subrecipients were required to submit documentation to support CDBG reimbursement requests.

The City also made every effort to comply with all CDBG and Consolidated Plan regulations. The City's Citizen Participation Plan ensures that community input is considered prior to the submission of a substantial amendment or an annual update to HUD. It also ensures residents have the opportunity to review and comment on annual performance. Construction, professional service, and subrecipient agreements have been prepared to ensure compliance with applicable federal regulations. Additionally, the City has implemented an open procurement process that encourages bidding from minority and women-owned businesses.

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.

To encourage resident participation in the City's CDBG program, the City published a notice in the *Orange County Register* on September 4, 2018, announcing a 15-day public comment period and public hearing for the 2017-2018 CAPER. The CAPER was made available for public review and comment at San Clemente City Hall (located at 100 Avenida Presidio and 910 Calle Negocio #100). The draft was also posted on the City's website. An additional opportunity for public comments was availed at the September 18, 2018, San Clemente City Council meeting. A copy of this notice and a summary of written comments is provided as **Attachment 1**.

CR-45 - CDBG 91.520(c)

Specify the nature of, and reasons for, any changes in the jurisdiction’s program objectives and indications of how the jurisdiction would change its programs as a result of its experiences.

The City of San Clemente did not undertake any action to change the program objectives identified in the Consolidated Plan and 2017-2018 Annual Action Plan.

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

No

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

Not applicable