



CITY OF SAN CLEMENTE

2016-2017 CONSOLIDATED ANNUAL PERFORMANCE & EVALUATION REPORT

Draft: August 22, 2017

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Attachments

Attachment 1: Public Notice and summary of public comments

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PR06: Summary of Consolidated Plan Projects for Report Year

PR26: CDBG Financial Summary Report 2016

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 2016-2017 CAPER provides a summary of the CDBG-funded activities undertaken by the City during the period of July 1, 2016, through June 30, 2017 (FY 2016-17). FY 2016-17 is the first year of the four years covered by the current Consolidated Plan. Accomplishment highlights for the year include the following:

- Rehabilitation assistance was provided to two lower income homeowners.
- Over 2,800 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, and case management for homebound seniors.
- Construction of sidewalks benefitting residential neighborhoods (1 project completed and one underway during the report period).
- Neighborhood park improvements (installation of new playground equipment and play area surface).
- 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) assisted 129 San Clemente renter households with a rental assistance voucher or certificate (as of 3/31/17).

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).

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. 1	Actual Program Yr. 1	Percent Complete Program Yr. 1
Affordable Housing Development	Affordable Housing	CDBG: \$	Rental units constructed	Household Housing Unit	1	0	0.00%	0	0	NA
Commercial Rehabilitation	Non-Housing Community Development	CDBG: \$	Businesses assisted	Businesses Assisted	20	1	0.05%	9	1	11.11%
Fair Housing Services	Administration	CDBG: \$	Other	Other	400	68	17.00%	100	68	68.00%
Program Administration	Administration	CDBG: \$	Other	Other	4	1	25.00%	1	1	100.00%
Public Facility Improvements	Non-Housing Community Development	CDBG: \$175,000	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit	Persons Assisted	5,000	1,905	38.10%	1,905	1,905	100.00%

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. 1	Actual Program Yr. 1	Percent Complete Program Yr. 1
Public Infrastructure Improvements	Non-Housing Community Development	CDBG: \$	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit	Persons Assisted	10,000	0	0.00%	4,100	2,905	0.00%
Public Services	Non-Housing Community Development	CDBG: \$	Public service activities other than Low/Moderate Income Housing Benefit	Persons Assisted	10,000	2,890	28.90%	2,600	2,890	111.15%
Public Services	Non-Housing Community Development	CDBG: \$	Homeless Person Overnight Shelter	Persons Assisted	25	18	72.00%	0	18	0.00%
Rental Housing Rehab	Affordable Housing	CDBG: \$	Rental units rehabilitated	Household Housing Unit	4	0	0.00%	2	0	0.00%
Single Family Housing Rehab	Affordable Housing	CDBG: \$	Homeowner Housing Rehabilitated	Household Housing Unit	20	2	10.00%	4	2	50.00%

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

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

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:

- Age Well Senior Services provided case management services that assessed the health and living situation of homebound seniors. The goal of the program is to help ensure seniors remain healthy and housed in place in an effort to avoid or delay costly institutionalization in managed care facilities – 33 seniors were served during the report period.
- Camino Health Center provided reduced cost medical and pediatric dental care services for lower income households, including the uninsured and the homeless – 2,472 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 – 218 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 emergency and transitional housing – 167 individuals were served 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 - 68 households were served during the report period.
- Grants to local entrepreneurs were available to update signs and other 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. Housing rehabilitation loans were provided to two homeowners. Improvements undertaken included 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 129 San Clemente renter households.

With respect to public infrastructure and facility improvement priorities, CDBG funding was allocated for the construction of sidewalks in residential neighborhoods within the City's CDBG target area. Projects installed missing sidewalk segments or replaced deteriorated sidewalks. One project was substantially completed during the report period; the second project required additional funding and will be constructed during the 2017-18 report period. CDBG funding was also utilized to install new playground equipment at San Luis Rey Park.

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	6,441
Black or African American	35
Asian	229
American Indian or American Native	40
Native Hawaiian or Other Pacific Islander	5
Total	6,750
Hispanic	1,902
Not Hispanic	4,848

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

Narrative

According to the U.S. Census Bureau, the majority of San Clemente residents are racially White – 82.6% per the *2011-2015 American Community Survey 5-Year Estimates*. This same data source reports that 18.4% of the City’s population is Hispanic/Latino – the City’s largest minority population.

Based on the data from Table 2, approximately 95% of program participants were White, with 39% 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 (51% and 80% 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

Source of Funds	Source	Resources Made Available	Amount Expended During Program Year
CDBG	CDBG	\$748,778	\$508,997

Table 3 - Resources Made Available

Narrative

According to the City's 2016-17 Annual Action Plan, the City anticipated utilizing \$363,089 in CDBG program resources comprised of its 2016 CDBG Annual Allocation of \$345,089, plus \$18,000 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, the City received its 2016 CDBG grant of \$345,089, and had access to \$18,000 in prior year funds; no program income was received; however, in November 2016, the City substantially amended the 2016-2017 Annual Action Plan to allocate an additional \$385,689 in prior year uncommitted CDBG funds for two capital improvement projects. In total, \$748,778 in CDBG resources funding was available for programming during the 2016-17 report period.

Identify the geographic distribution and location of investments

Target Area	Planned Percentage of Allocation	Actual Percentage of Allocation	Narrative Description
CDBG Census Tracts	41	61	Census Tract Block Groups identified by HUD as eligible for CDBG-funded activities
Citywide	59	39	Citywide program or activity

Table 4 – Identify the geographic distribution and location of investments

Narrative

Table 4 demonstrates the expenditure of 61% of CDBG funds in eligible Census Tracts. This percentage is considerably different than the "Planned" allocations. The primary reason for this difference is the Substantial Amendment undertaken by the City in November 2016 to allocate over \$385,000 in uncommitted prior year CDBG funds for two projects originally not listed in in the 2016-2017 Annual Action Plan. Both the W. Palizada Sidewalk and San Luis Rey Park Playground Equipment projects are eligible for CDBG funding due to their location, i.e., Census Tract Block Groups with a significant percentage of low- and moderate-income residents as defined by HUD (see **Attachment 2: Map of CDBG Target Areas**)

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 \$75,800 in other resources was used to leverage federal funds during the 2016-17 report period. These sources included the following:

- Good Neighbor Grants (City funded social service programs): \$57,712
- General Fund (staff time to manage Puente Sidewalk): \$12,000
- Park Asset Replacement Fund: (San Luis Rey Park Playground Equipment): \$6,092

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.

	One-Year Goal	Actual
Number of Homeless households to be provided affordable housing units	0	0
Total	0	0

Table 5 – Number of Households

	One-Year Goal	Actual
Number of households supported through rental assistance ¹	140	129
Number of households supported through the production of new units	0	0
Number of households supported through the rehab of existing units	6	2
Number of households supported through the acquisition of existing units	0	0
Total	146	131

Table 6 – Number of Households Supported

1. Assistance provided by the Orange County Housing Authority (OCHA).

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 2016-17 report period. The 2016-2017 Annual Action Plan set a one-year goal to rehabilitate six housing units (four single-family units and two rental units). During the report period, program staff initiated the rehabilitation of two units – neither project was completed by June 30, 2017. The low accomplishment rate is attributed to a six-month delay in implementing the housing rehabilitation program. Specifically, new contract program staff was engaged by the City at the beginning of the 2016-17 report period. A complete rewrite of program policies and procedures was undertaken by the City's Housing Rehabilitation consultant and City staff.

“Households supported through rental assistance” are San Clemente households assisted by OCHA.

Discuss how these outcomes will impact future annual action plans.

As indicated above, a comprehensive retooling of the City's housing rehabilitation program was completed during the 2016-17 report period. Program staff has indicated additional time will be necessary to assess if program revisions will meet the communities housing needs or if additional modifications may be necessary.

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

Number of Households Served	CDBG Actual	HOME Actual
Extremely Low-income	0	0
Low-income	1	0
Moderate-income	1	0
Total	2	0

Table 7 – Number of Households Served

Narrative Information

Table 7 provides information regarding the households that received housing rehabilitation assistance during FY 2016-17. OCHA reports that 129 very low-income and extremely low-income San Clemente households received rental assistance during the 2016-17 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 2016-17 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 agencies FAM's continuum of homeless services.

Addressing the emergency shelter and transitional housing needs of homeless persons

During the 2016-17 report period, the City did not fund any emergency shelter programs with CDBG funds; however, CDBG funding for Laura's House was utilized to provide transitional housing opportunities for 18 victims of domestic violence. FAM utilized Good Neighbor Grant resources to assist 17 individuals with short-term emergency housing (i.e., motel vouchers).

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 2016-17 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's homelessness prevention program utilized Good Neighbor Grant funds to pay for a portion of housing cost to prevent eviction or to prevent utility shut-off - 75 individuals benefited from this type of assistance. Additionally, FAM utilized funds to provide transportation, medical and food to numerous San Clemente residents.

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 2016-17 report period, no CDBG funding was allocated to specifically fund permanent housing activities for homeless persons; however, FAM utilized Good Neighbor Grant to 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 2016-2017 Annual Action Plan indicated that the City would 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.

During the 2016-17 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 68 households were assisted during the report period. During the report period, six housing discrimination complaints were received by FHF. Complaints alleged fair housing discrimination based on religion (one case) and physical disability (5 cases). After further investigation, three cases were opened for further action – all three were successfully resolved. Fair housing issues addressed by FHF's education staff included habitability, notices and rent increase issues. Fair housing workshops for landlords, property managers and tenants were also held in the City, as was one fair housing walk-in clinic. FHF's outreach team attended community events and also distributed over 2,000 pieces of fair housing literature throughout the City

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, 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 2016-17 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 encourage 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 as appropriate. 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 2016-17 was constructed after 1978 and the other tested free of lead-based hazards. If necessary, safe work practices, as dictated by HUD, would be used to address the lead 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 8% of San Clemente residents have incomes below the poverty level, this figure includes approximately 4.9% of City residents age 65 and older and 9.7% 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 2016-17 report period, seniors were assisted with in-home support and case management services – services were provided free of charge. The City also provided funding to its 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. Finally, 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 2016-17, 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 in general. 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 in the ongoing 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.

In July 2013, HUD published proposed rules that substantially revamped existing AI rules; however, final implementing regulations were not published at the time a new AI needed to be prepared (FY 2015-16). Consistent with HUD’s directive, the City partnered with 15 Orange County jurisdictions to prepare the updated AI, which provided a summary of fair housing impediments and the actions to be taken by the City to address impediments. Impediments and steps taken by the City to address fair housing impediments during FY 2016-17 are 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 did not conduct any on-site visit of subrecipients during the 2016-17 report period; however, HUD CPD staff monitor the City's CDBG program during the report period. This monitoring included review of public service grant subrecipients – 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 ***Sun Post News*** on August 21, 2017, announcing a 15-day public comment period and public hearing for the 2016-2017 CAPER. The CAPER was made available for public review and comment at San Clemente City Hall and the Community Development Department (located at 100 Avenida Presidio and 910 Calle Negocio #100 respectively). The draft was also posted on the City's website. A public hearing to obtain additional public comments was held by the San Clemente City Council on September 5, 2017. 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 2016-2017 Annual Action Plan. The City did substantially amend the Annual Action Plan in order to allocate prior year funds originally not designated for use. Funds were allocated to activities that addressed goals and objectives identified in the Consolidated 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