

CITY OF SAN CLEMENTE

2019-2020

Annual Action Plan

Approved April 2, 2019

CDBG-CV1 Amendment

Approved June 6, 2020

CDBG-CV3 Amendment

Draft December 15, 2020

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December 2020 CDBG-CV Amendment

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Executive Summary

AP-05 Executive Summary - 24 CFR 91.200(c), 91.220(b)

1. Introduction

The 2019-2020 Annual Action Plan for the City of San Clemente satisfies federal requirements to receive Community Development Block Grant (CDBG) funds from the U.S. Department of Housing and Urban Development (HUD).

The primary objective of the CDBG program is to develop viable urban communities by providing decent housing, a suitable living environment, and economic opportunities, principally for low- and moderate-income individuals.

Each activity to be undertaken with CDBG funds must meet one of the three national objectives:

- Benefit low and moderate-income persons,
- Aid in the prevention or elimination of slums and blight, or
- Meet a community need having a particular urgency.

In order to receive CDBG funds the City must prepare a Consolidated Plan. The Consolidated Plan is a multi-year strategic plan that identifies priority housing and community needs. It also identifies the activities the City will implement over a four-year period to address needs. The Action Plan, a component of the Consolidated Plan, is the City's annual expenditure plan for the use of CDBG funds to address the needs identified in the Consolidated Plan.

The 2019 federal budget was approved on February 15, 2019, and HUD has announced funding allocations for 2019. The City will receive \$346,463 in 2019 CDBG funding (\$3,537 less than the City's 2018 grant). The City has also identified \$105,000 in prior year CDBG funds that will be available during FY 2019-20 to fund eligible activities. Program income received during FY 2019-20 will be available to fund eligible housing rehabilitation activities.

The 2019-2020 Action Plan details the specific activities the City will undertake with CDBG funds to address housing and community needs identified in the Consolidated Plan. Planned activities include housing rehabilitation and minor commercial property improvements, public infrastructure improvements, public social services grants, and program administration (including fair housing services).

December 2020 CDBG-CV3 Amendment

On March 27, 2020, the Coronavirus Aid, Relief, and Economic Security Act of 2020 (CARES Act) was signed into law. Pursuant to the CARES Act, HUD has allocated \$209,487 in CDBG-Coronavirus (CDBG-CV) funds to the City of San Clemente to fund activities that prevent, prepare for, or respond to local community impacts of the Coronavirus pandemic. As directed by HUD, the 2016-2019 Consolidated Plan/2019-2020 Annual Action Plan was amended on June 6, 2020, to add Round 1 of CDBG-CV funded activities to the 2019-2020 Annual Action Plan. The City of San Clemente allocated CDBG-CV Round 1 funds to assist nonprofit agencies that provide rental assistance, utility assistance, meals, homeless outreach, and CDBG-CV program administration.

On September 11, 2020, HUD announced the City would receive \$445,109 in CDBG-CV Round 3 funds. These funds must also be used to prevent, prepare for, or respond to the Coronavirus pandemic, and the 2016-2019 Consolidated Plan/2019-2020 Annual Action Plan should be further amended to add Round 3 funds. Round 3 funds will be used to provide services for households and homeless individuals affected by the Coronavirus and provide grants to small businesses impacted by COVID-19 required social distancing, stay-at-home orders, and mandatory closures.

2. Summarize the objectives and outcomes identified in the Plan

The four-year CDBG program objectives and outcomes identified in the 2016-2019 Consolidated Plan are summarized below. Corresponding proposed outcomes for FY 2019-20 are also provided below:

- Public Infrastructure Improvements: 4 Yr. Goal: Projects benefitting 10,000 individuals / FY 19-20 Goal: One new project is planned benefitting 1,810 individuals
- Public Facility Improvements: 4 Yr. Goal: Projects benefitting 5,000 individuals / FY 19-20 Goal: No projects planned
- Single and Multi-Family Housing Rehabilitation: 4 Yr. Goal: 20 owner-occupied and 4 rental units rehabilitated / FY 19-20 Goal: 4 owner-occupied and 1 rental unit rehabbed
- Commercial Rehabilitation: 4 Yr. Goal: Assist 20 business / FY 19-20 Goal: 7 businesses
- Homeless Services: 4 Yr. Goal: 25 homeless individuals will be assisted with shelter and/or support services / FY 19-20 Goal: 238 individuals with homelessness prevention assistance, shelter, and support services
- Public Services: 4 Yr. Goal: 10,000 residents assisted / FY 19-20 Goal: 2,952 individuals assisted
- Fair Housing Services: Services to address impediments to fair housing choice. 4 Yr. Goal: Assist 500 households / FY 19-20 Goal: 80 households
- Program Administration: CDBG program oversight and coordinate. 4 Yr. Goal: 4 Years of program admin / FY 19-20 Goal: 1 Year of program admin

December 2020 CDBG-CV3 Amendment

- **Public Services:**
 - **Mobile Outreach Services: CDBG-CV3 Goal - Assisted 100 individuals with homelessness prevention assistance, shelter, and support services**

- *Homeless Prevention: CDBG-CV3 Goal - Assisted 500 individuals with rental, utility, and food assistance services*
- *Business Grants: CDBG-CV3 Goal - Assisted 50 businesses (50 Jobs) with grants to pay for items such as PPE, unpaid back rent/utilities, and business equipment*
- *Program Administration: CDBG-CV3 Goal - program oversight and coordination*

3. Evaluation of past performance

FY 2018-19 is the third year of the City’s 2016-2019 Consolidated Plan cycle. Activities funded in the 2018-19 Annual Action Plan will be completed by June 30, 2019; therefore, there are only two complete years of past performance data to report at this time. These accomplishments are summarized in **Attachment 1**.

4. Summary of Citizen Participation Process and consultation process

The participation of residents and community stakeholders in prioritizing the use of CDBG funds is an important component of the Consolidated Plan (and Action Plan) planning process. For the 2019-2020 Action Plan, the City obtained public input in a variety of ways:

- On December 6, 2018, the City held a meeting for current and potential CDBG public service grant applicants. In addition to discussing the grant application process, input regarding the service needs of area residents was solicited. This meeting was held in partnership with the cities of Aliso Viejo, Lake Forest, Mission Viejo, and Rancho Santa Margarita.
- The City’s Human Affairs Commission held a meeting on February 12, 2019, to accept public input regarding the allocation of CDBG public service grant funds.
- On March 2, 2019, a notice was published in a *O.C. Register* announcing the required 30-day public comment period for the draft 2019-2020 Annual Action Plan. The notice also announced 2019-2020 public hearing to be held by the City Council.
- On April 2, 2019, the San Clemente City Council held a public hearing to accept additional public input regarding the draft 2019-2020 Annual Action Plan and authorize submission of the plan to HUD.

December 2020 CDBG-CV3 Amendment

- *A 5-day public review and comment period to provide members of the public an opportunity to review the proposed use of CDBG-CV3 funds.*
- *A City Council public hearing to provide an additional opportunity for public input regarding the proposed use of CDBG-CV3 funds.*

5. Summary of public comments

No public comments were received by the City during the 30-day public comment period or during the public hearing. Summary of comments provide in Section AP-12 and **Attachment 2**.

December 2020 CDBG-CV3 Amendment

See Attachment A.

6. Summary of comments or views not accepted and the reasons for not accepting them

All comments and views were accepted – none were rejected.

December 2020 CDBG-CV3 Amendment

See Attachment A.

7. Summary

The 2019-2020 Annual Action Plan is the fourth and final year of the 2016-2019 Consolidated Plan cycle. The Annual Action Plan, is the City’s one-year expenditure plan for CDBG funds. HUD has notified the City that it will receive \$346,463 in CDBG funds for FY 2019-20. An additional \$105,000 in prior year uncommitted CDBG funds, plus program income resources received during the year, will also be available during the year to carry out CDBG-eligible activities. The Action Plan details the activities the City will undertake with CDBG funds in support of the broader goals and objectives of the Consolidated Plan. Activities planned for funding include housing rehabilitation, public infrastructure improvements, commercial sign/minor building façade improvements, public social services, and program administration, including fair housing services.

December 2020 CDBG-CV3 Amendment

HUD allocated \$209,487 in CDBG-CV Round 1 funds to the City. CDBG-CV funds must be used to prevent, prepare for, or respond to local impacts of the Coronavirus. CDBG-CV may not be used to pay costs if another source of financial assistance is available to pay these costs. For the City to receive and use CDBG-CV funds, the City is required to amend its FY 2019-2020 CDBG Annual Action Plan to describe how the funds will be allocated. The City allocated CDBG-CV1 funds to provide rental assistance, utility assistance, senior meals, and medical services for lower-income San Clemente households impacted by the Coronavirus pandemic. Furthermore, funds will be allocated for homeless outreach services and CDBG-CV program administration.

On September 11, HUD notified the City that it would receive \$445,109 in CDBG-CV Round 3 funds. In total, \$654,596 in CDBG-CV funds will be allocated to City. The City will use CDBG-CV3 funds to provide public service grants to assist lower-income households impacted by the Coronavirus, grants for small businesses that have been financially impacted by social distancing, stay-at-home orders, and mandatory closures, and CDBG-CV program administration.

PR-05 Lead & Responsible Agencies – 91.200(b)

1. Agency/entity responsible for preparing/administering the Consolidated Plan

Describe the agency/entity responsible for preparing the Consolidated Plan and those responsible for administration of each grant program and funding source.

Table 1 – Responsible Agencies

Agency Role	Name	Department/Agency
CDBG Administrator	San Clemente, CA	Community Development

Narrative (optional)

The City’s Community Development Department is primarily responsible for the administration of CDBG funds including preparation of the Consolidated Plan, annual action plans, and year-end performance reports.

Consolidated Plan Public Contact Information

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AP-10 Consultation – 91.100, 91.200(b), 91.215(I)

1. Introduction

Pursuant to HUD regulations, the City has taken several action steps to obtain the input of residents and stakeholders to develop the 2019-2020 Annual Action Plan. Consultation efforts included workshops with current and potential applicants for CDBG funding and with the City's Human Affairs Committee. The City also utilized its internet webpage and the newspaper to notify residents of the opportunity to review and comment on the draft 2019-2020 Annual Action Plan.

Provide a concise summary of the jurisdiction's activities to enhance coordination between public and assisted housing providers and private and governmental health, mental health and service agencies (91.215(I))

The City of San Clemente works closely with the County of Orange Housing Authority (OCHA), which administers the federal rental assistance voucher and certificate programs. The City has limited resources to assist with the development of housing opportunities, but as such opportunities evolve, City staff will work with developers to encourage the development of housing for lower income residents.

Through the annual CDBG Public Service Grants and City-funded Good Neighbor Grants funding process, City staff can ascertain the services City residents need and develop partnerships with local agencies to coordinate the delivery of needed services.

Describe coordination with the Continuum of Care and efforts to address the needs of homeless persons (particularly chronically homeless individuals and families, families with children, veterans, and unaccompanied youth) and persons at risk of homelessness.

As a participant in the Orange County Continuum of Care (OC CoC) planning process, the City provides information to the OC CoC regarding the activities it will fund to address local homeless issues. This information is used by the OC CoC to prepare the region's application to HUD for Homeless Assistance Grant funds. As needed, City staff will expedite certifications of consistency with the Consolidated Plan and other forms of support for the OC CoC. The City also participated in the 2017 and 2019 regional homeless Point-In-Time survey.

Describe consultation with the Continuum(s) of Care that serves the jurisdiction's area in determining how to allocate ESG funds, develop performance standards for and evaluate outcomes of projects and activities assisted by ESG funds, and develop funding, policies and procedures for the operation and administration of HMIS

The City is not a recipient of Emergency Solutions Grant (ESG) funds; therefore, it does not assist the OC CoC with the determination of ESG allocations, nor evaluating outcomes, or developing policies and procedures for the administration of the regional Homeless Management Information System (HMIS).

2. Describe Agencies, groups, organizations and others who participated in the process and describe the jurisdiction’s consultations with housing, social service agencies and other entities (see Table 2 below):

Table 2 – Agencies, groups, organizations who participated

1	Agency/Group/Organization	Orange County Housing Authority
	Agency/Group/Organization Type	PHA Other government - County
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Public Housing Needs
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Provided information regarding number and type of households receiving HUD rental assistance.
2	Agency/Group/Organization	211 Orange County
	Agency/Group/Organization Type	Regional organization
	What section of the Plan was addressed by Consultation?	Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Homelessness Strategy Homeless Management Information System (HMIS) Admin
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Regional Continuum of Care coordinator and HMIS administrator. Provided information regarding regional and local homeless populations and shelter resources.
3	Agency/Group/Organization	Fair Housing Foundation
	Agency/Group/Organization Type	Service-Fair Housing
	What section of the Plan was addressed by Consultation?	Impediments to Fair Housing

	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Agency provided data and information that helped identify the needs of lower income families and individuals requiring fair housing services. Also provided input regarding the City's strategy to address impediments to fair housing.
4	Agency/Group/Organization	Age Well Senior Services
	Agency/Group/Organization Type	Services-Elderly Persons
	What section of the Plan was addressed by Consultation?	Non-Homeless Special Needs
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Provided input regarding the service needs of seniors, including home bound seniors.
5	Agency/Group/Organization	Families Forward
	Agency/Group/Organization Type	Services - Housing Services-homeless
	What section of the Plan was addressed by Consultation?	Homeless Needs - Families with children Homelessness Strategy Needs of Low/Mod persons
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Provided input regarding housing and service needs of homeless families and families at risk of becoming homeless.
6	Agency/Group/Organization	Family Assistance Ministries
	Agency/Group/Organization Type	Services - Housing Services-homeless

	What section of the Plan was addressed by Consultation?	Homeless Needs - Families with children Homelessness Strategy Needs of Low/Mod persons
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Provided input regarding housing and service needs of homeless individuals and households at risk of becoming homeless.
7	Agency/Group/Organization	South County Outreach
	Agency/Group/Organization Type	Services-homeless
	What section of the Plan was addressed by Consultation?	Needs of Low/Mod persons
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Provided input regarding the needs of lower income households specifically, individuals/households at risk of becoming homeless.
8	Agency/Group/Organization	Camino Health Center
	Agency/Group/Organization Type	Services-Health
	What section of the Plan was addressed by Consultation?	Anti-poverty Strategy Needs of Low/Mod persons
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Provided input regarding medical/dental service needs of the community including homeless individuals.
9	Agency/Group/Organization	Laura's House
	Agency/Group/Organization Type	Services-Victims of Domestic Violence
	What section of the Plan was addressed by Consultation?	Non-Homeless Special Needs

	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Agency helped identify the needs of homeless women and women with children including victims of domestic violence.
10	Agency/Group/Organization	City of San Clemente
	Agency/Group/Organization Type	Other government – Local
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Homelessness Strategy Non-Homeless Special Needs Economic Development Market Analysis
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Various city departments, committees, and City Council provided data and information. Also played a key role in identifying priorities and recommendations for the allocation of HUD funds.

Identify any Agency Types not consulted and provide rationale for not consulting

The City made an effort to have an open consultation process. No agency was excluded from the consultation process.

Other local/regional/state/federal planning efforts considered when preparing the Plan

Table 3 – Other local / regional / federal planning efforts

Name of Plan	Lead Organization	How do the goals of your Strategic Plan overlap with the goals of each plan?
Continuum of Care	211 Orange County	Helped the City establish program goals to address the needs of the San Clemente homeless. Includes regional and local point in time survey, 10-Year Plan to End Homelessness (including Discharge Plan).
City of San Clemente 2013-2021 Housing Element	City of San Clemente	Provided housing priorities and program goals.

Name of Plan	Lead Organization	How do the goals of your Strategic Plan overlap with the goals of each plan?
City of San Clemente Capital Improvement Plan	City of San Clemente	Helped to identify priority capital projects that may be CDBG-eligible.
5 Yr & 1 Yr PHA Plan	Orange County Housing Authority	Identified OCHA resources to address housing needs of lower income renter householders in the City.
Analysis of Impediments to Fair Housing	16 Orange County HUD Grantee Cities	Multi-jurisdictional document identified fair housing impediments within participating cities and outlined a plan to address issues.

Narrative (optional)

AP-12 Participation – 91.105, 91.200(c)

**1. Summary of citizen participation process/Efforts made to broaden citizen participation
Summarize citizen participation process and how it impacted goal-setting**

The City of San Clemente provided several opportunities for public participation throughout the Annual Action Plan preparation process. These opportunities included public meetings, a 30-day public review of the draft Annual Action Plan, and a City Council public hearing. The notice for the required public comment period and public hearing is provided as **Attachment 2** of this plan. Actions are further summarized below:

December 2020 CV3-Amendment

*Public Hearing: The City Council will hold a hearing on December 15, 2020, to accept public input regarding the second substantial amendment to the City’s 2016-2019 Consolidated Plan/2019-2020 Annual Action Plan for the use of CDBG-CV Round 3 funds. Pursuant to waivers authorized by HUD to expedite the use of CDBG-CV funds, a notice was posted on the City’s website announcing the availability of the proposed second substantial amendment to the 2016-2019 Consolidated Plan/2019-2020 Action Plan regarding the use of CDBG-CV3 funds (See **Attachment A**).*

Citizen Participation Outreach

Table 4 – Citizen Participation Outreach

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
1	Public Meeting	Public Service Agencies	12/6/18: 17 social service providers	Provided input regarding the needs of homeless, homeless families and senior issues	NA	NA

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
2	Public Meeting	Non-targeted/broad community	2/12/19 Human Affairs Commission meeting to accept public input on allocation of CDBG public service grant funds	None	NA	NA
3	Newspaper Ad	Non-targeted/broad community	Notice of 30-day public review period (3/4/19 to 4/2/19)	None	NA	NA
4	Public Hearing	Non-targeted/broad community	4/2/19 public hearing	None	NA	NA
5	Internet Outreach	Non-targeted/broad community	Public notice of 5-day public comment period & public hearing (CDBG-CV1)	See Attachment A	NA	www.san-clemente.org
6	Public Hearing	Non-targeted/broad community	6/2/20 City Council public hearing (CDBG-CV1)	See Attachment A	NA	NA
7	Internet Outreach	Non-targeted/broad community	Public notice of 5-day public comment period and public hearing	TBD	TBD	www.san-clemente.org
8	Public Hearing	Non-targeted/broad community	12/15/20 City Council public hearing	TBD	TBD	NA

Expected Resources

AP-15 Expected Resources – 91.220(c) (1, 2)

Introduction

The 2019 federal budget was approved on February 15, 2019. On April 12, 2019 HUD announced that the City will receive \$346,463 in CDBG funds for FY 2019-20. Additionally, the City identified \$105,000 in prior year CDBG funds that may be available during FY 2019-20. Program income received during FY 2019-20 will also be available to fund eligible housing rehabilitation activities. Housing voucher/certificate resources (via OCHA) and Good Neighbor grants (social service grants from the City's General Fund) will also be available to support activities that address the goals of the Consolidated Plan.

The City has access to In-lieu Affordable Housing Fee resources; however, at this time no project has been identified for the use of these funds.

June 2020 CDBG-CV Amendment

On April 2, 2020, HUD notified the City it would receive \$209,487 in CDBG-CV Round 1 funds under the CARES Act of 2020. On June 6, 2020, the City Council approved a substantial amendment to the 2019-2020 Annual Action Plan to receive and allocate CDBG-CV1 funds to eligible activities. On September 11, 2020, HUD notified the City it will receive an additional \$445,109 in Round 3 CDBG-CV funds. Another substantial amendment is necessary to receive and allocate this additional allocation of CARES Act funds.

Table 5 - Expected Resources – Priority Table

City of San Clemente 2019-2020 Annual Action Plan – CDBG-CV Amendment

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Program	Source of Funds	Uses of Funds	Expected Amount Available Year 4				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
CDBG	public – federal	Acquisition Admin & Planning Economic Development Housing Public Improvements Public Services	346,463	0	105,000	451,463	0	Annual CDBG allocation from HUD, program income and prior year funds.
Section 8	Public-federal	Housing	0	0	0	0	0	Annual CDBG allocation from HUD, program income and prior year funds.
General Fund	public – local	Public Services	0	0	0	0	0	Approximately \$57,700 in General Fund resources for service providers
<i>Other</i>	<i>Public-federal</i>	<i>To prevent, prepare for and respond to the coronavirus</i>	209,487	0	0	209,487	0	<i>CDBG-CV funds to be used to prevent, prepare for, and respond to the Coronavirus – Round 1</i>
<i>Other</i>	<i>Public-federal</i>	<i>To prevent, prepare for and respond to the coronavirus</i>	445,109	0	0	445,109	0	<i>CDBG-CV funds to be used to prevent, prepare for, and respond to the Coronavirus – Round 3</i>

Explain how federal funds will leverage those additional resources (private, state and local funds), including a description of how matching requirements will be satisfied

In past years, the City was able to leverage federal funds with local redevelopment funds. In 2012 the State Legislature and the governor passed legislation to dissolve all redevelopment agencies in the State. As a result, this funding source is no longer available. The City has identified other

resources that will be available to carry out activities that address the goals of the Consolidated Plan:

- OCHA reports that as of January 2019, a total of 151 San Clement households received rental assistance. It is anticipated that a similar number of households will be assisted during FY 2019-20.
- On an annual basis, the City allocates General Fund resources to support a variety of social service programs in the community (Good Neighbor grants). Several types of social service programs are funded with these resources including homelessness prevention, senior services, youth services, and services for the disabled.
- In-lieu Affordable Housing Fund resources generated by the City's Inclusionary Housing Program are available to assist nonprofit agencies purchase land or existing housing units for the provision of affordable housing. The program requires developers of six or more housing units to set aside 4% of units developed for households earning 50% or less of the area median income. The affordable requirement can be provided either on site, off site, or by paying an in lieu fee. Recent housing development has generated approximately \$1,000,000 for the fund. No specific project is presently slated to use this resource; however, these funds are considered one-time funds, as large-scale housing development in the City is complete and the City has approached build out.

CDBG does not require matching funds.

December 2020 CDBG-CV3 Amendment

On March 27, 2020, the CARES Act was signed into law. HUD notified the City that it would receive \$209,487 in CDBG-CV Round 1 funds to undertake activities that prevent, prepare for, or respond to local community impacts of the Coronavirus. On September 11, 2020, HUD notified the City it will receive \$445,109 in CDBG-CV Round 3 funds. These funds must also be used to address the impacts of the Coronavirus on lower-income San Clemente residents.

If appropriate, describe publically owned land or property located within the jurisdiction that may be used to address the needs identified in the plan

As indicated in the Consolidated Plan, San Clemente is nearly "built out" with limited vacant land; nonetheless, the City's Housing Element identifies several vacant and underutilized sites that may be suitable for housing development. Nearly all vacant residential sites are small, infill parcels located west of Interstate 5. Most parcels identified in the Housing Element residential sites inventory are in the City's Affordable

Housing Overlay. The intent of the Overlay Zone is to encourage the development of affordable rental and for sale housing in commercial and mixed-use zones.

Discussion

Funding resources to implement the City’s 2019-20 Annual Action Plan are limited. The City will receive \$346,463 in 2019 CDBG funding from HUD. This amount is \$3,537 less than the City’s 2018 CDBG allocation. An additional \$105,000 in uncommitted prior year CDBG resources is available in FY 2019-20, and CDBG-funded housing rehabilitation loan repayments (i.e., Revolving Loan Funds) will provide the City with additional resource for housing rehabilitation programs.

OCHA has aggressively pursued new rental assistance resources - the City will continue to support OCHA’s efforts to secure these resources. Additionally, for the foreseeable future, the City will continue to support programs serving City residents with Good Neighbor social service grants. Finally, the City has identified vacant and underutilized land that may be suitable housing development - in lieu fees for affordable housing development are available to support affordable housing activities; however, no projects are identified at this time.

Annual Goals and Objectives

AP-20 Annual Goals and Objectives - 91.420, 91.220(c)(3)&(e)

Goals Summary Information

Table 6 – Goals Summary

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
1	Public Infrastructure Improvements	2016	2019	Non-Housing Community Development	CDBG census tracts	Public Improvements	CDBG: \$206,208	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 1,810 Persons Assisted
2	Single Family Housing Rehab	2016	2019	Affordable Housing	Citywide	Housing Rehabilitation	CDBG: \$100,000	Homeowner Housing Rehabilitated: 4 Household Housing Unit
3	Rental Housing Rehab	2016	2019	Affordable Housing	Citywide	Housing Rehabilitation	CDBG: \$10,000	Rental units rehabilitated: 1 Household Housing Unit
4	Commercial Rehabilitation	2016	2019	Non-Housing Community Development	CDBG census tracts <i>Low/Mod Jobs</i>	Commercial Rehabilitation	CDBG: \$14,000 <i>CDBG-CV: (Round 3) \$178,044</i>	Businesses assisted: 5 <i>Businesses assisted: 50 Businesses Assisted</i>

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
5	Public Services	2016	2019	Non-Housing Community Development	Citywide	Public Services	<p>CDBG: \$43,595</p> <p>CDBG-CV: (Round 1) \$73,538</p>	<p>Public service activities other than Low/Moderate Income Housing Benefit: 2,952 Persons Assisted</p> <p><i>Public service activities other than Low/Moderate Income Housing Benefit: 400 Persons Assisted</i></p>
6	Homeless Services	2016	2019	Homeless	Citywide	Public Services	<p>CDBG: \$8,370</p> <p>CDBG-CV: (Round 1) \$115,000</p> <p>CDBG-CV: (Round 3) \$178,044</p>	<p>Homeless Person Overnight Shelter: 63 Persons Assisted Homelessness Prevention: 175 Persons Assisted</p> <p><i>Public service activities other than Low/Moderate Income Housing Benefit: 741 Persons Assisted</i></p> <p><i>Homeless Person Overnight Shelter: 15 Persons Assisted</i></p> <p><i>Homelessness Prevention: 88 Persons Assisted</i></p> <p>Public service activities other than Low/Moderate Income Housing Benefit: 100 Persons Assisted</p> <p>Homelessness Prevention: 500 Persons Assisted</p>

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
7	Fair Housing Services	2016	2019	Administration	Citywide	Administration	CDBG: \$4,465	Other: 80 Other
8	Program Administration	2016	2019	Administration	Citywide	Administration	CDBG: \$64,825 CDBG-CV: (Round 1) \$20,949 CDBG-CV: (Round 3) \$89,021	Other: 1 Other Other: 1 Other

Goal Descriptions

Table 7 – Goal Descriptions

1	Goal Name	Public Infrastructure Improvements
	Goal Description	Improvements to public infrastructure that primarily benefits low- and moderate-income persons
2	Goal Name	Single Family Housing Rehab
	Goal Description	Housing rehabilitation assistance to improve residential properties
3	Goal Name	Rental Housing Rehab
	Goal Description	Housing rehabilitation assistance to improve residential properties

4	Goal Name	Commercial Rehabilitation
	Goal Description	Business signs and other minor façade improvements. <i>On December 11, 2020, added small business assistance grant for businesses impacted by the Coronavirus (CDBG-CV3 funding).</i>
5	Goal Name	Public Services
	Goal Description	Safety net services for lower income households (2,952 planned for 2019). <i>On June 2, 2020, CDBG-CV1 funds added to provide public services to an estimated 400 individuals. On December 15, 2020, added CDBG-CV3 funding to provide public services to provide homelessness prevention assistance.</i>
6	Goal Name	Homeless Services
	Goal Description	Housing and service options for households at risk of homelessness or already homeless (2019 goals are 63 with shelter and 175 for prevention). <i>On June 2, 2020, added CDBG-CV1 funding to provide public services to an estimated 741 individuals, 15 with overnight shelter, and 88 with homelessness prevention assistance. On December 15, 2020, added CDBG-CV3 funding to provide public services for homeless outreach and homelessness prevention assistance.</i>
7	Goal Name	Fair Housing Services
	Goal Description	Fair housing education and enforcement services
8	Goal Name	Program Administration
	Goal Description	CDBG program oversight and coordination. <i>On June 2, 2020, added CDBG-CV1 funding to provide admin services for CARES Act funds. On December 15, 2020, added CDBG-CV3 funding to provide admin services for CARES Act funds.</i>

Estimate the number of extremely low-income, low-income, and moderate-income families to whom the jurisdiction will provide affordable housing as defined by HOME 91.215(b):

The City of San Clemente is not a recipient of HOME funds; however, CDBG resources will be allocated to assist with the rehabilitation of residential housing units. It is projected that four low- and moderate-income homeowners will be assisted with CDBG resources during FY 2019-20. One lower income renter household may also be assisted.

AP-35 Projects – 91.220(d)

Introduction

The following activities have been allocated CDBG funds for FY 2019-20. It is important to note that funding levels for activities listed below were adjusted from estimated funding levels to match the City's actual 2019 allocation once announced by HUD, and as approved by the City Council.

Table 8 – Project Information

#	Project Name
1	Single Family Housing Rehabilitation Program
2	Rental Housing Rehabilitation
3	Commercial Signs and Minor Facade Improvement Grants
4	Camino Health Center
5	Family Assistance Ministries
6	Laura's House
7	Fun On The Run
8	Fair Housing Foundation
9	CDBG Program Administration
10	Capital Project (Avenida Cabrillo Sidewalks)
11	<i>CDBG-CV1 Age Well</i>
12	<i>CDBG-CV1 Camino Health Center</i>
13	<i>CDBG-CV1 - City Net</i>
14	<i>CDBG-CV1 Family Assistance Ministries</i>
15	<i>CDBG-CV1 Administration</i>
16	CDBG-CV3 – Small Business Grants
17	CDBG-CV3 - Public Services
18	CDBG-CV3 - Administration

Describe the reasons for allocation priorities and any obstacles to addressing underserved needs

The City will allocate a portion of its CDBG funds for activities that address the housing and service needs of the elderly and lower income households, especially those at risk of becoming homeless.

According to data from the Consolidated Plan, these households are contributing a significant portion of their income to maintain their housing. Consistent with the City's Homeless Strategy, resources will be allocated to help households remain housed in place rather than fall into homelessness. For those already homeless, resources are allocated to provide a continuum of housing and support services. The City's housing rehabilitation program will also focus its efforts to assist elderly homeowners undertake improvement of respective residences to address specific household needs. Additionally, the City will encourage and support OCHA's efforts to obtain additional rental assistance funding for San Clemente households.

Projects

AP-38 Projects Summary

Project Summary Information

Table 9 – Project Summary

1	Project Name	Home Rehabilitation Program
	Target Area	Citywide
	Goals Supported	Owner-occupied Housing Rehabilitation
	Needs Addressed	Housing Rehabilitation
	Funding	CDBG: \$100,000
	Description	CDBG funded housing rehabilitation loans or grants for eligible homeowners.
	Target Date	6/30/2020
	Estimate the number and type of families that will benefit from the proposed activities	4 owner-occupied housing units
	Location Description	Citywide
	Planned Activities	CDBG funds (\$100,000 in FY 19-20 funds plus program income received during the year) for homeowner housing rehabilitation loans or grants to address housing/building code deficiencies and deferred property improvements.
2	Project Name	Rental Housing Rehabilitation
	Target Area	Citywide
	Goals Supported	Rental Housing Rehab
	Needs Addressed	Housing Rehabilitation

	Funding	CDBG: \$10,000
	Description	CDBG funds for housing rehabilitation loans or grants for eligible rental units.
	Target Date	6/30/2020
	Estimate the number and type of families that will benefit from the proposed activities	1 rental housing unit
	Location Description	Citywide
	Planned Activities	CDBG funds (\$10,000 in FY 19-20 funds plus program income received during the year) for rental housing rehabilitation loans or grants to address housing/building code deficiencies and deferred building improvements.
3	Project Name	Commercial Signs and Minor Facade Improvement Grants
	Target Area	CDBG census tracts
	Goals Supported	Commercial Rehabilitation
	Needs Addressed	Commercial Rehabilitation
	Funding	CDBG: \$14,000
	Description	Grants to update or upgrade business signs or facades
	Target Date	6/30/2020
	Estimate the number and type of families that will benefit from the proposed activities	Up to 5 business to be assisted
	Location Description	To be determined but located within CDBG-eligible Census Tract Block Groups
	Planned Activities	Grants to business owners to update or upgrade business signs and/or other minor building facades improvements.

4	Project Name	Camino Health Center
	Target Area	Citywide
	Goals Supported	Public Services
	Needs Addressed	Public Services
	Funding	CDBG: \$16,865
	Description	Low cost medical and pediatric dental services for low- and moderate-income persons
	Target Date	6/30/2020
	Estimate the number and type of families that will benefit from the proposed activities	2,500 low- and moderate-income persons
	Location Description	1031 Avenida Pico, Ste. 104, San Clemente CA
	Planned Activities	Primary medical care and pediatric dental services at reduced cost for lower income persons and indigents.
5	Project Name	Family Assistance Ministries
	Target Area	Citywide
	Goals Supported	Homeless Services
	Needs Addressed	Public Services
	Funding	CDBG: \$8,370
	Description	Housing, support services, and case management for households that are at risk of homelessness and those that are homeless
	Target Date	6/30/2020

	Estimate the number and type of families that will benefit from the proposed activities	205 low- and moderate-income persons (Homelessness Prevention - 175, Emergency Shelter - 9, Transitional Housing -9, Rapid Rehousing – 9, and Permanent Supportive Housing - 3)
	Location Description	Citywide
	Planned Activities	A continuum of housing and supportive service for households at risk of homelessness and those that are homeless.
6	Project Name	Laura's House
	Target Area	Citywide
	Goals Supported	Public Services
	Needs Addressed	Public Services
	Funding	CDBG: \$9,865
	Description	Shelter, counseling, and support services for victims of domestic violence
	Target Date	6/30/2020
	Estimate the number and type of families that will benefit from the proposed activities	225 individuals that are victims of domestic violence (Emergency Shelter - 8, Transitional Housing -25, and Counseling/Hotline – 192)
	Location Description	Citywide
	Planned Activities	Shelter, counseling and support services for victims of domestic violence.
7	Project Name	Fun On The Run
	Target Area	Citywide
	Goals Supported	Public Services
	Needs Addressed	Public Services
	Funding	CDBG: \$16,865

	Description	Youth recreation program
	Target Date	6/30/2020
	Estimate the number and type of families that will benefit from the proposed activities	An estimated 260 youths
	Location Description	Citywide
	Planned Activities	After school recreation and homework assistance program with a focus on low- and moderate-income children.
8	Project Name	Fair Housing Foundation
	Target Area	Citywide
	Goals Supported	Fair Housing Services
	Needs Addressed	Administration
	Funding	CDBG: \$4,465
	Description	Fair housing outreach, education and enforcement services with the goal to reduce and eliminate impediments to the fair access of housing
	Target Date	6/30/2020
	Estimate the number and type of families that will benefit from the proposed activities	80 households
	Location Description	Citywide
	Planned Activities	Fair housing outreach, education and enforcement services including: landlord, tenant and property management fair housing training; community outreach and education; complaint investigation and enforcement services.

9	Project Name	CDBG Program Administration
	Target Area	Citywide
	Goals Supported	Program Administration
	Needs Addressed	Administration
	Funding	CDBG: \$64,825
	Description	CDBG program oversight and coordination
	Target Date	6/30/2020
	Estimate the number and type of families that will benefit from the proposed activities	Not applicable
	Location Description	910 Calle Negocio Ste. 100, San Clemente CA – City Hall
Planned Activities	Program oversight and coordination including management of public service grants, housing rehabilitation programs, and preparation of required applications and reports.	
10	Project Name	Capital Project: Avenida Cabrillo Sidewalks
	Target Area	CDBG census tracts
	Goals Supported	Public Infrastructure Improvements
	Needs Addressed	Public Improvements
	Funding	CDBG: \$206,208
	Description	Installation of missing and replacement of deteriorated sidewalks.
	Target Date	06/30/2020
	Estimate the number and type of families that will benefit from the proposed activities	Estimated 1,810 individuals, 77.90% of which are low- and moderate-income

	Location Description	Avenida Cabrillo between Ola Vista and El Camino Real
	Planned Activities	Installation of missing or deteriorated sidewalks.
11	Project Name	<i>CDBG-CV1 Age Well</i>
	Target Area	<i>Citywide</i>
	Goals Supported	<i>Public Services</i>
	Needs Addressed	<i>Public Services</i>
	Funding	<i>CDBG-CV: \$40,000</i>
	Description	<i>Senior Meal Programs</i>
	Target Date	<i>6/30/2021</i>
	Estimate the number and type of families that will benefit from the proposed activities	<i>200 lower-income seniors</i>
	Location Description	<i>Citywide</i>
	Planned Activities	<i>Expanded meal programs due to conversion of congregate lunch program to Grab & Go lunches and increased demand for their Meals on Wheels program</i>
12	Project Name	<i>CDBG-CV1 Camino Health Center</i>
	Target Area	<i>Citywide</i>
	Goals Supported	<i>Public Services</i>
	Needs Addressed	<i>Public Services</i>
	Funding	<i>CDBG-CV: \$33,538</i>
	Description	<i>Healthcare services for individuals impacted by COVID-19</i>
	Target Date	<i>6/30/2021</i>

	Estimate the number and type of families that will benefit from the proposed activities	<i>200 lower-income individuals</i>
	Location Description	<i>1031 Avenida Pico, Ste. 104, San Clemente CA</i>
	Planned Activities	<i>Primary care medical services for lower income residents impacted by COVID-19 including COVID-19 testing, production of education materials about infection prevention, and primary care services</i>
13	Project Name	<i>CDBG-CV1 City Net</i>
	Target Area	<i>Citywide</i>
	Goals Supported	<i>Homeless Services</i>
	Needs Addressed	<i>Public Services</i>
	Funding	<i>CDBG-CV: \$75,000</i>
	Description	<i>Bridge housing and case management for chronic homeless</i>
	Target Date	<i>6/30/2021</i>
	Estimate the number and type of families that will benefit from the proposed activities	<i>15 homeless individuals</i>
	Location Description	<i>Citywide</i>
	Planned Activities	<i>Bridge (or temporary) housing for unsheltered homeless to help comply with social distancing and stay-at-home orders, plus support services and case management</i>
14	Project Name	<i>CDBG-CV1 Family Assistance Ministries</i>
	Target Area	<i>Citywide</i>
	Goals Supported	<i>Homeless Services</i>

	Needs Addressed	<i>Public Services</i>
	Funding	<i>CDBG-CV: \$40,000</i>
	Description	<i>Hunger and homelessness prevention assistance</i>
	Target Date	<i>6/30/2021</i>
	Estimate the number and type of families that will benefit from the proposed activities	<i>829 individuals (88 with direct housing/utility assistance and 741 with case management and food pantry services)</i>
	Location Description	<i>Citywide</i>
	Planned Activities	<i>Housing and utility assistance, food pantry services, and case management for households impacted by COVID-19</i>
15	Project Name	<i>CDBG-CV1 Administration</i>
	Target Area	<i>Citywide</i>
	Goals Supported	<i>Program Administration</i>
	Needs Addressed	<i>Administration</i>
	Funding	<i>CDBG-CV: \$20,949</i>
	Description	<i>CDBG-CV program oversight and coordination</i>
	Target Date	<i>6/30/2021</i>
	Estimate the number and type of families that will benefit from the proposed activities	<i>Not applicable</i>
	Location Description	<i>910 Calle Negocio Ste. 100, San Clemente CA – City Hall</i>
	Planned Activities	<i>CDBG-CV program oversight and coordination including management of public service grants and preparation of required applications and reports.</i>

16	Project Name	CDBG-CV3 Small Business Grants
	Target Area	Citywide
	Goals Supported	Business Assistance
	Needs Addressed	Economic Opportunities
	Funding	CDBG-CV3: \$178,044
	Description	Grants for small businesses impacted by the Coronavirus that will preserve jobs for lower-income individuals
	Target Date	6/30/2023
	Estimate the number and type of families that will benefit from the proposed activities	50 Jobs
	Location Description	Citywide
	Planned Activities	Grants to small businesses impacted by social distance, stay at home, and mandatory shut-down orders. Grants can be used to purchase PPE, pay back rent and utilities, and renting certain restaurant materials and supplies
17	Project Name	CDBG-CV3 Public Services
	Target Area	Citywide
	Goals Supported	Homeless Services
	Needs Addressed	Public Services
	Funding	CDBG-CV3: \$178,044
	Description	Hunger and homelessness prevention assistance
	Target Date	6/30/2023

	Estimate the number and type of families that will benefit from the proposed activities	<i>600 individuals (500 with direct housing/utility assistance, case management, and food pantry services, plus 100 homeless individuals)</i>
	Location Description	<i>Citywide</i>
	Planned Activities	<i>Housing and utility assistance, food pantry services, and case management for at-risk households impacted by COVID-19, and mobile outreach services for homeless impacted by COVID-19</i>
18	Project Name	<i>CDBG-CV3 Administration</i>
	Target Area	<i>Citywide</i>
	Goals Supported	<i>Program Administration</i>
	Needs Addressed	<i>Administration</i>
	Funding	<i>CDBG-CV: \$89,021</i>
	Description	<i>CDBG-CV program oversight and coordination</i>
	Target Date	<i>6/30/2023</i>
	Estimate the number and type of families that will benefit from the proposed activities	<i>Not applicable</i>
	Location Description	<i>910 Calle Negocio Ste. 100, San Clemente CA – City Hall</i>
Planned Activities	<i>CDBG-CV program oversight and coordination, including management of public service grants and preparation of required applications and reports</i>	

Describe the reasons for allocation priorities and any obstacles to addressing underserved needs:

The City will allocate a portion of its CDBG funds for activities that address the housing and service needs of the elderly and lower income households, especially those at risk of becoming homeless. According to data from the Consolidated Plan, these households are contributing a significant portion of their income to maintain housing. Consistent with the City’s Homeless Strategy, resources will be allocated to help these

households remain housed in place rather than fall into homelessness. The City’s housing rehabilitation program will assist elderly homeowners undertake improvement of respective residences to address specific household needs, and upgrade the City’s rental housing stock. Additionally, the City will encourage and support OCHA’s efforts to obtain additional rental assistance funding for San Clemente households.

AP-50 Geographic Distribution – 91.220(f)

Description of the geographic areas of the entitlement (including areas of low-income and minority concentration) where assistance will be directed

Almost all activities slated for CDBG-funding during FY 2019-20 will be available on a citywide basis to income eligible individuals and households. These activities include public services and housing rehabilitation. Activities such as commercial sign and façade improvements and sidewalk improvements will be limited to specific areas of the City where a significant percentage of residents meet HUD’s income limits. A map of the City’s CDBG Target Areas is provided as **Attachment 3**.

Geographic Distribution

Table 10 - Geographic Distribution

Target Area	Percentage of Funds
CDBG census tracts	49
Citywide	51

Rationale for the priorities for allocating investments geographically

Funding is principally allocated on a citywide basis as the City’s primary intent is to serve lower income residents that need housing/services regardless of where they live in the City. Area wide activities (e.g., public improvements) are limited to the City’s CDBG-eligible areas.

Discussion

It is the City’s primary intent to use CDBG funds to assist eligible households that need services regardless of where they live in the City. A portion of funds will be focused in specific areas of the City that have a large percentage of low- and moderate-income residents.

Affordable Housing

AP-55 Affordable Housing – 91.220(g)

Introduction

The City will utilize limited CDBG funds and program income to provide housing rehabilitation loans and grants to eligible homeowners and renter-occupied housing units.

Table 11 - One Year Goals for Affordable Housing by Support Requirement

One Year Goals for the Number of Households to be Supported	
Homeless	0
Non-Homeless	5
Special-Needs	0
Total	5

Table 12 - One Year Goals for Affordable Housing by Support Type

One Year Goals for the Number of Households Supported Through	
Rental Assistance	0
The Production of New Units	0
Rehab of Existing Units	5
Acquisition of Existing Units	0
Total	5

Discussion

The City will utilize 2019-20 CDBG funds to assist with the rehabilitation of owner-occupied and renter-occupied housing units. While not the primary focus of the program, some special-needs households (senior and disabled) may be assisted during the year by this program. The City will also continue to support OCHA’s program activities in the community. An estimated 150 households will receive rental assistance vouchers or certificates during FY 2019-20. CDBG funding will also be allocated to provide a variety of housing options and services for households at risk of becoming homeless, and those already homeless (homelessness prevention 175 individuals, emergency shelter 17 individuals, transitional housing 34 individuals, rapid rehousing 9 individuals, and 3 with permanent supportive housing).

AP-60 Public Housing – 91.220(h)

Introduction

San Clemente does not own or manage public housing.

Actions planned during the next year to address the needs to public housing

Not applicable.

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

Not applicable.

If the PHA is designated as troubled, describe the manner in which financial assistance will be provided or other assistance

Not applicable.

Discussion

San Clemente does not own or manage public housing.

AP-65 Homeless and Other Special Needs Activities – 91.220(i)

Introduction

As outlined in the Consolidated Plan, the City's homeless strategy emphasizing preventing homelessness. Based on the proposition that it is less expensive and disruptive to keep a household housed in place, the City will use CDBG resources to fund programs that provide services that help households to maximize the amount of income they can contribute toward housing. Services to be funded with CDBG include reduced cost after-school youth recreation services, reduced cost medical services, counseling/legal services (for victims of domestic violence), and homelessness prevention assistance. To assist those already homeless, CDBG funding will be allocated for programs offering emergency shelter, transitional housing, and rapid rehousing.

Describe the jurisdictions one-year goals and actions for reducing and ending homelessness including:

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

The City of San Clemente does not directly fund homeless outreach services; however, the City does support agencies that work directly with both sheltered and unsheltered homeless populations. Agencies such as Family Assistance Ministries conduct extensive outreach and vulnerability assessments throughout San Clemente and neighboring communities. Other agencies conduct similar outreach and assessment services for specific homeless populations such as victims of domestic violence and transitional age youth.

December 2020 CDBG-CV3 Amendment

CDBG-CV3 funds will be utilized to provide homeless mobile street outreach and engagement services. Program staff will link homeless individuals with housing, referrals, and resources. The program resources may also be used to offer Personal Protective Equipment (PPE), COVID-19 testing and other measures to prevent the spread of COVID-19.

Addressing the emergency shelter and transitional housing needs of homeless persons

As indicated in the Consolidated Plan, there are 40 transitional shelter beds in the community managed by two agencies. These shelter beds are earmarked for special need populations such as homeless families and transitional age youth. Additionally, there are shelter beds for victims of domestic violence. 2019-20 CDBG funding is allocated to support emergency and transitional housing provided by Laura's House and Family Assistance Ministries. It is projected that 17 individuals will be assisted with CDBG-funded emergency shelter and 34 with CDBG-funded transitional 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

As outlined above, the City will focus its CDBG resources on preventing homelessness and assisting those already homeless. For FY 2019-20, CDBG funding is also allocated to support Rapid Rehousing services offered by Family Assistance Ministries. This program will assist families including chronically homeless families and veterans and their families. It is anticipated that nine individuals will be assisted with rapid rehousing and support services. Additionally, as previously indicated, a shelter for transitional age youth is situated in the City. While no CDBG funding is allocated toward this program in FY 2019-20, the shelter and program resources are available to local homeless youth.

Upon request, the City will support agencies that provide homeless housing and supportive services by providing a Certification of Consistency with the Consolidated Plan. (Note that in addition to being consistent with the Consolidated Plan, programs must also comply with applicable federal, state and local regulations). Additionally, the City will continue to support the regional CoC as it seeks resources to address regional homeless issues. The City will also support OCHA's efforts to obtain additional housing assistance vouchers for homeless Veterans (VASH). OCHA reports that as of January 2019 there are three veteran households benefitting from VASH housing assistance in San Clemente.

Helping low-income individuals and families avoid becoming homeless, especially extremely low-income individuals and families and those who are: 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); or, receiving assistance from public or private agencies that address housing, health, social services, employment, education, or youth needs.

It is the City's strategy to help a household at risk of becoming homeless to stay in their home. CDBG funding is allocated to provide financial assistance and case management to prevent homelessness. The City will also continue to participate in regional homeless planning efforts including the OC CoC's Discharge Plan, which aims to prevent individuals leaving institutions, hospitals, etc., from becoming homeless.

December 2020 CDBG-CV3 Amendment

CDBG-CV3 funds will be utilized to prevent homelessness. Funds will provide food and rent and utility assistance to lower-income households financially impacted by COVID-19 due to a job loss, reduction in work hours, or layoff.

Discussion

The City's homeless strategy is to help prevent homelessness and to support local service providers' efforts to seek additional resources. CDBG funds are allocated for safety net services that will help households at risk of homelessness redirect limited income toward housing. If necessary, financial

assistance and case management may be provided. CDBG funds will also be utilized to provide emergency, transitional, and rapid rehousing services.

AP-75 Barriers to affordable housing – 91.220(j)

Introduction

Barriers to affordable housing and actions to overcome barriers are detailed in the Consolidated Plan and the City's Housing Element. Key elements are summarized below.

Actions it planned 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

Housing Resources: The City will encourage developers to seek private and other public funding sources to reduce the development cost of housing units. To the extent that funds are available, resources such as Inclusionary Housing in-lieu fees may be made available to assist nonprofit agencies purchase land or existing housing units to create new long-term affordable housing opportunities.

Environmental Review. The Housing Element identifies exemptions that state and federal laws provide to streamline the environmental review process. City staff will assist property owners and developers navigate the various environmental review regulations to help reduce the holding cost associated with the time needed to comply with these reviews.

Planning and Development Fees. The City does not typically offer fee waivers; however, the City Council may approve a waiver, offer deferred or reduced fees, or supplement fees with funds from the In-lieu Fee Fund, for affordable housing projects.

Permit and Processing Procedures. The City's Housing Element outlines several time and cost savings development processes aimed at reducing the holding time of housing developers. For affordable housing project, City staff will interact with project sponsors early in the process to determine project feasibility and will assist the 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; however, some areas of the City are subject to Mello-Roos assessments.

Discussion

The City's Housing Element outlines a comprehensive plan to address barriers to affordable housing - the Consolidated Plan mirrors this plan.

AP-85 Other Actions – 91.220(k)

Introduction

Outlined below are the actions the City will implement to address the sub-strategies of the Consolidated Plan.

Actions planned to address obstacles to meeting underserved needs

The City will allocate a portion of CDBG funds for activities that address the service needs of the elderly and lower-income households. Additionally, the City will encourage and support OCHA's efforts to obtain additional rental assistance funding especially for senior and low-income households. The City's housing rehabilitation programs will be available to assist elderly and disabled homeowners undertake improvement of respective residences to address specific household needs.

Actions planned to foster and maintain affordable housing

The City of San Clemente has identified the actions it will undertake during FY 2019-2020 to foster and maintain affordable housing. The Consolidated Plan identified programs such as Housing Rehabilitation assistance as the means to maintain and improve housing currently available to low- and moderate-income residents. By providing deferred payment loans or grants, owners are able to rehabilitate their properties to meet basic housing quality standards and incur zero or minimal additional housing costs. Funding is also allocated to rehabilitate rental housing units. It is estimated five housing units will be assisted with CDBG funds during FY 2019-20.

Actions planned to reduce lead-based paint hazards

To ensure compliance with federal regulations, all housing units constructed before 1978, that are rehabbed with CDBG funds, will be tested for lead-paint hazards. If lead is found, additional assistance may be provided to eliminate or mitigate lead hazards in compliance with current regulations.

Actions planned to reduce the number of poverty-level families

Per Census data, approximately 6.4% of the City's population is living below the poverty level including 7.4% of children under the age of 18 and 5.1% of seniors (age 65 and older). During FY 2019-20, the City will fund the following activities with the goal of reducing the number of poverty-level households:

- Housing programs including rehabilitation for lower income, senior, and disabled homeowners, and rental assistance for very low-income renters (via housing rehabilitation assistance and the OCHA rental assistance).
- Public services that provide free or reduced cost services to lower income households that will help to improve their quality of life.
- Commercial property upgrades to improve neighborhood aesthetics and expand economic opportunities for lower income residents.

- *CDBG-CV3 funded grants to assist lower-income households experiencing financial hardships due to the Coronavirus pandemic. Financial support includes rent and utility assistance. Funds will also be used to preserve or create employment opportunities for lower-income individuals.*

Actions planned to develop institutional structure

The City has made an effort to develop an institutional structure that will help identify and access resources to improve the community. The City will continue to work with nonprofit and public entities to deliver public services. As a member of the Orange County Continuum of Care Community Forum, the City will provide critical information to the County of Orange for preparation of the County's Continuum of Care Homeless Assistance grant application to HUD. The City will also continue to assist OCHA implement its Five-year Public Housing Authority (PHA) Plan for the provision of rental assistance vouchers and certificates.

Actions planned to enhance coordination between public and private housing and social service agencies

The City of San Clemente does not operate public housing - OCHA provides rental assistance in the community. Federal legislation requires that OCHA prepare a five-year and one-year plans that highlight its mission, goals and objectives as it relates to public and assisted housing programs. The City will review OCHA's plans and will provide OCHA the opportunity to review and consult with the City regarding its Consolidated Plan/Annual Action Plan. The goal of this cross-consultation is to provide consistent and coordinated housing services for City residents.

San Clemente has also developed positive working relationships with private and nonprofit housing developers. Additionally, ongoing working relationships with local nonprofits social service providers promotes the efficient and effective use of limited private and public resources to address the service needs of the community.

Discussion

HUD regulations require that the City prepare an Analysis of Impediments to Fair Housing choice (AI) every five years. In addition to identifying impediments, a strategy to overcome barriers must be developed and implemented annually. Accomplishments are reported annually. In May 2015, the City of San Clemente and 15 other Orange County jurisdictions entered an agreement to prepare an AI. This multi-jurisdictional AI evaluates existing demographic data, past fair housing enforcement activity for each partner community, region and city-specific mortgage lender data, and existing housing and land use public policies. Based on an extensive analysis of this data, and the input of residents, a list of impediments to fair housing choice for the participating cities was developed. A corresponding set of action steps to ameliorate these barriers was prepared. A summary of identified Impediments is provided as **Attachment 4**. **NOTE: not all impediments identified in the AI may be present in San Clemente.** The specific action steps the City will undertake during FY 2019-20 are also listed in **Attachment 4**.

Program Specific Requirements

AP-90 Program Specific Requirements – 91.220(I)(1,2,4)

Introduction

Each HUD program that is covered by the Consolidated Plan regulations must address certain program specific requirements.

Community Development Block Grant Program (CDBG) Reference 24 CFR 91.220(I)(1)

Projects planned with all CDBG funds expected to be available during the year are identified in the Projects Table. The following identifies program income that is available for use that is included in projects to be carried out.

1. The total amount of program income that will have been received before the start of the next program year and that has not yet been reprogrammed	0
2. The amount of proceeds from section 108 loan guarantees that will be used during the year to address the priority needs and specific objectives identified in the grantee's strategic plan.	0
3. The amount of surplus funds from urban renewal settlements	0
4. The amount of any grant funds returned to the line of credit for which the planned use has not been included in a prior statement or plan	0
5. The amount of income from float-funded activities	0
Total Program Income:	0

Other CDBG Requirements

1. The amount of urgent need activities	0
2. The estimated percentage of CDBG funds that will be used for activities that benefit persons of low and moderate income. Overall Benefit - A consecutive period of one, two or three years may be used to determine that a minimum overall benefit of 70% of CDBG funds is used to benefit persons of low and moderate income. Specify the years covered that include this Annual Action Plan.	100.00%

Discussion

The City will meet the overall 70% benefit for low and moderate-income requirement during the one-year 2019 Program Year.

PUBLIC NOTICE
(Posted on www.san-clemente.org)

**Second Substantial Amendment to the
2016-2019 Consolidated Plan/2019-2020 Annual Action Plan**

Per federal regulations [24 CFR 91], and applicable waivers made available through the Coronavirus Aid, Relief, and Economic Security Act of 2020 (CARES Act), notice is given that the City of Clemente is making a second amendment to its 2016-2019 Consolidated Plan/2019-2020 Annual Action Plan to accept and allocate Community Development Block Grant-Coronavirus Round Three funds (CDBG-CV3).

Amendment

The second amendment to the 2016-2019 Consolidated Plan/2019-2020 Annual Action Plan will enable the City of San Clemente to receive and administer \$445,109 in CDBG-CV3 funding allocated to the City by the U.S. Department of Housing and Urban Development (HUD). CDBG-CV3 funds must be used to prevent, prepare for, or respond to the Coronavirus pandemic. CDBG-CV3 funds will be allocated for the following activities:

	CDBG-CV3 FUNDS	SERVICE TO BE PROVIDED
Public Services	\$178,044	<ul style="list-style-type: none">• Funds to expand homeless mobile outreach to assist homeless individuals impacted by COVID-19• Rent, utility, and food assistance for lower-income households affected by COVID-19
Economic Development – Business Grants	\$178,044	<ul style="list-style-type: none">• Grants to businesses, that employ lower-income persons, that are impacted by social distancing, stay-at-home orders, and mandatory closures
CDBG-CV Administration	\$89,021	<ul style="list-style-type: none">• Funding for staff cost associated with grant oversight and reporting
TOTAL:	\$445,109	

Public Comment Period

The draft second substantial amended 2016-2019 Consolidated Plan/2019-2020 Annual Action Plan is available for review on the City’s website: www.san-clemente.org/departments-services/social-services/housing-services. The 2016-2019 Consolidated Plan/2019-2020 Annual Action Plan amendment is available for a 5-day public review and comment period commencing December 10, 2020, and ending December 14, 2020. Members of the public may submit written comments during the public review and comment period. Comments should be submitted no later than 5 PM on December 14, 2020, to the following:

City of San Clemente
Attention: Janet Batchelor
910 Calle Negocio, Suite 100
San Clemente, CA 92673

Written comments may also be submitted by email to BatchelorJ@san-clemente.org. Email comments must also be received no later than 5 PM on December 14, 2020.

Public Hearing

On December 15, 2020, the San Clemente City Council will hold a public hearing to accept additional public comments regarding the second substantial 2016-2019 Consolidated Plan/2019-2020 Annual Action Plan.

Public Participation in City Council Meeting During the Coronavirus Pandemic

The following practices are being implemented to help prevent the spread of the Coronavirus:

- 1) Members of the public are invited to listen to the meeting via live stream from the City's YouTube channel at www.san-clemente.org/live or live on Cox Communications Local Access Channel 854.*
- 2) Members of the public can submit their comments on agenda items to the Council electronically. Material may be emailed to Campagnol@san-clemente.org Transmittal by 4:00 PM on Council meeting days is recommended. Comments must indicate by item title or number the agenda item to which they apply or indicate that they are to be read during the general "oral communications" portion of the meeting. Emails lacking that indication will be forwarded to the City Council's general email accounts. Depending on the number of comments submitted on a particular item and the total amount of time allocated for the Council meeting, the Council may limit the time allocated for each comment at the beginning of its deliberation of an item.*

SUMMARY OF PUBLIC COMMENTS

Public Comment Period Summary

To be provided at the conclusion of the comment period.

Public Hearing Summary

To be provided at the conclusion of the public hearing.

Certifications

In accordance with the applicable statutes and the regulations governing the Consolidated Plan regulations, the jurisdiction certifies that:

Affirmatively Further Fair Housing -- The jurisdiction will affirmatively further fair housing.

Uniform Relocation Act and Anti-displacement and Relocation Plan -- It will comply with the acquisition and relocation requirements of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended, (42 U.S.C. 4601-4655) and implementing regulations at 49 CFR Part 24. It has in effect and is following a residential anti-displacement and relocation assistance plan required under 24 CFR Part 42 in connection with any activity assisted with funding under the Community Development Block Grant or HOME programs.

Anti-Lobbying -- To the best of the jurisdiction's knowledge and belief:

1. No Federal appropriated funds have been paid or will be paid, by or on behalf of it, to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with the awarding of any Federal contract, the making of any Federal grant, the making of any Federal loan, the entering into of any cooperative agreement, and the extension, continuation, renewal, amendment, or modification of any Federal contract, grant, loan, or cooperative agreement;
2. If any funds other than Federal appropriated funds have been paid or will be paid to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with this Federal contract, grant, loan, or cooperative agreement, it will complete and submit Standard Form-LLL, "Disclosure Form to Report Lobbying," in accordance with its instructions; and
3. It will require that the language of paragraph 1 and 2 of this anti-lobbying certification be included in the award documents for all subawards at all tiers (including subcontracts, subgrants, and contracts under grants, loans, and cooperative agreements) and that all subrecipients shall certify and disclose accordingly.

Authority of Jurisdiction -- The Consolidated Plan is authorized under State and local law (as applicable) and the jurisdiction possesses the legal authority to carry out the programs for which it is seeking funding, in accordance with applicable HUD regulations.

Consistency with plan -- The housing activities to be undertaken with Community Development Block Grant, HOME, Emergency Solutions Grant, and Housing Opportunities for Persons With AIDS funds are consistent with the strategic plan in the jurisdiction's consolidated plan.

Section 3 -- It will comply with section 3 of the Housing and Urban Development Act of 1968 (12 U.S.C. 1701u) and implementing regulations at 24 CFR Part 135.

Signature of Authorized Official

Date

City Manager
Title

Specific CDBG Certifications

The Entitlement Community certifies that:

Citizen Participation -- It is in full compliance and following a detailed Citizen Participation Plan that satisfies the requirements of 24 CFR 91.105.

Community Development Plan -- Its consolidated plan identifies community development and housing needs and specifies both short-term and long-term community development objectives that have been developed in accordance with the primary objective of the CDBG program (i.e., the development of viable urban communities, by providing decent housing and expanding economic opportunities, primarily for persons of low and moderate income) and requirements of 24 CFR Parts 91 and 570.

Following a Plan -- It is following a current Consolidated Plan that has been approved by HUD.

Use of Funds -- It has complied with the following criteria:

1. **Maximum Feasible Priority.** With respect to activities expected to be assisted with CDBG funds, it certifies that it has developed its Action Plan so as to give maximum feasible priority to activities which benefit low and moderate income families or aid in the prevention or elimination of slums or blight. The Action Plan may also include activities which the grantee certifies are designed to meet other community development needs having a particular urgency because existing conditions pose a serious and immediate threat to the health or welfare of the community, and other financial resources are not available).
2. **Overall Benefit.** The aggregate use of CDBG funds including Section 108 guaranteed loans during program year(s) _____ shall principally benefit persons of low and moderate income in a manner that ensures that at least 70 percent of the amount is expended for activities that benefit such persons during the designated period.
3. **Special Assessments.** It will not attempt to recover any capital costs of public improvements assisted with CDBG funds including Section 108 loan guaranteed funds by assessing any amount against properties owned and occupied by persons of low and moderate income, including any fee charged or assessment made as a condition of obtaining access to such public improvements.

However, if CDBG funds are used to pay the proportion of a fee or assessment that relates to the capital costs of public improvements (assisted in part with CDBG funds) financed from other revenue sources, an assessment or charge may be made against the property with respect to the public improvements financed by a source other than CDBG funds.

In addition, in the case of properties owned and occupied by moderate-income (not low-income) families, an assessment or charge may be made against the property for public improvements financed by a source other than CDBG funds if the jurisdiction certifies that it lacks CDBG funds to cover the assessment.

Excessive Force -- It has adopted and is enforcing:

1. A policy prohibiting the use of excessive force by law enforcement agencies within its jurisdiction against any individuals engaged in non-violent civil rights demonstrations; and
2. A policy of enforcing applicable State and local laws against physically barring entrance to or exit from a facility or location which is the subject of such non-violent civil rights demonstrations within its jurisdiction;

Compliance With Anti-discrimination laws -- The grant will be conducted and administered in conformity with title VI of the Civil Rights Act of 1964 (42 USC 2000d), the Fair Housing Act (42 USC 3601-3619), and implementing regulations.

Lead-Based Paint -- Its activities concerning lead-based paint will comply with the requirements of 24 CFR Part 35, subparts A, B, J, K and R;

Compliance with Laws -- It will comply with applicable laws.

Signature of Authorized Official

Date

City Manager
Title

Appendix to Certifications

INSTRUCTIONS CONCERNING LOBBYING CERTIFICATION:

Lobbying Certification

This certification is a material representation of fact upon which reliance was placed when this transaction was made or entered into. Submission of this certification is a prerequisite for making or entering into this transaction imposed by section 1352, title 31, U.S. Code. Any person who fails to file the required certification shall be subject to a civil penalty of not less than \$10,000 and not more than \$100,000 for each such failure.