



CITY OF INDIO'S 2019 CAPER

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CR-05 - Goals and Outcomes

Progress the jurisdiction has made in carrying out its strategic plan and its action plan.

91.520(a)

This could be an overview that includes major initiatives and highlights that were proposed and executed throughout the program year.

The FY 2019-20 Consolidated Annual Performance Evaluation Report (CAPER) is the first submission of accomplishments pertaining to the 2019-2024 Five-Year Consolidated Plan by the City of Indio, which reports accomplishments based on the program year 2017 Annual Action Plan that covers July 1, 2019 through June 30, 2020. State and local governments that directly receive Community Development Block Grant Funds (CDBG) from the Department of Housing and Urban Development (HUD) are required to submit the CAPER ninety days after the end of the program year (due September 28th). The CAPER meets three basic purposes:

- It provides HUD with the information necessary to assess the City's ability to carry out CDBG programs in compliance with all applicable rules and regulations;
- It provides information necessary for HUD's Annual Report to Congress, which is statutorily mandated; and
- It provides the City with the opportunity to describe its progress in assisting neighborhoods and specific populations with a variety of community development issues as stipulated in the City's Five-Year Consolidated Plan.

All social service organizations under the City's Special Needs Services- Goal has accomplished or exceeded annual objectives. The City's Better Neighborhood Program is well on its way. This project is expected to be completed by end of program year 2020.

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)

Categories, priority levels, funding sources and amounts, outcomes/objectives, goal outcome indicators, units of measure, targets, actual outcomes/outputs, and percentage completed for the City of Indio's first program year goals.

	Matrix Code	Accomplishment Type	Open Count	Completed Count	Program Year Totals
Housing	Rehab; Multi-Unit Residential (14B)	Housing Units	0	0	0
	Total Housing		0	0	0
Public Facilities and Improvements	Homeless Facilities (not operating costs) (03C)	Public Facilities	0	75	75
	Street Improvements (03K)	Persons	2,065	7,540	9,605
	Other Public Improvements Not Listed in 03A-03S (03Z)	Public Facilities	0	0	0
	Total Public Facilities and Improvements		2,065	7,615	9,680
Public Services	Operating Costs of Homeless/AIDS Patients Programs (03T)	Persons	0	5,559	5,559

Youth Services (05D)	Persons	0	273	273
Fair Housing Activities (if CDBG, then subject to 15% cap) (05J)	Persons	0	1,343	1,343
Neighborhood Cleanups (05V)	Persons	0	18,370	18,370
Food Banks (05W)	Persons	0	637	637
Other Public Services Not Listed in 05A-05Y, 03T (05Z)	Persons	0	6,797	6,797
Total Public Services		0	32,979	32,979
Grand Total		2,065	40,594	42,659

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.

The City's use of funds directly addresses the four (4) major initiatives that were proposed within the five-year plan (listed by highest priority):

- Maintain and enhance the quality of existing residential neighborhoods;
- Provide support of programs that meet the social services and economic needs of the City’s residents with an emphasis on the homeless, seniors and youth; and
- Promote affordable housing opportunities for all economic segments of the community.
- CDBG Grant Administration

Consistent with the City's first priority, the majority of funding was allocated to the City's Better Neighbor Program (BNP).

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 Beneficiaries by Racial / Ethnic Category

Housing- Non Housing	Race	Total Persons	Total Hispanic Persons
Housing	Other multi-racial	0	0
	Total Housing	0	0
Non Housing	White	13,510	9,882
	Black/African American	768	3
	Asian	63	0
	American Indian/Alaskan Native	117	0
	Native Hawaiian/Other Pacific Islander	13	0
	American Indian/Alaskan Native & White	6	0
	Black/African American & White	3	0
	Amer. Indian/Alaskan Native & Black/African Amer.	56	0
	Other multi-racial	148	0
	Total Non Housing	14,684	9,885

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

Narrative

Hispanics were the largest population served (9,882) while American Indian or American Natives were the smallest during the 2019 CAPER period (based on more than 50 individuals served per group).

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	public - federal	865,050.00	219,836.17
CDBG- CV Round 1	public - federal	512,368	0
CDBG- CV Round 2	public - federal	755,754.	0

Table 3 - Resources Made Available

Narrative

The City will receive an annual funding allocation of approximately \$865,050 during the CAPER period.

On March 27, 2020, the Coronavirus Aid, Relief, and Economic Security Act (CARES Act), Public Law 11-136, was signed, providing \$5 billion for CDBG to prevent, prepare for, and respond to COVID-19 and the economic and housing impacts caused by this unprecedented crisis.

To date, the City of Indio has received two rounds of funding, which brought its cumulative amount for all allocations to \$1,268,122. The first round's allocation of \$512,368 was allocated as amended in the City's 2019-20 Annual Action Plan (AAP). On September 11, 2020, the City was notified of its second CARES Act allocation of \$755,754. Round 1 funding has been programed and which amended the City's 2019 AAP. Round 2 funding and its programming was presented and approved by the City Council on November 18th.

Identify the geographic distribution and location of investments

Target Area	Planned Percentage of Allocation	Actual Percentage of Allocation	Narrative Description
Better Neighborhoods Program	20		
CDBG	30		
City Wide	50		

Table 4 – Identify the geographic distribution and location of investments

Narrative

Indio will use a place-based strategy during the planning period. The geographic distribution of funding is predicated somewhat on the nature of the activity to be funded. It is the City's intent to fund activities in the areas most directly affected by the needs of low-income residents and those with other special needs. The Annual Action Plan directs investment geographically to an area benefit neighborhood. The area benefit category is the most commonly used national objective for activities that benefit a residential neighborhood. An area benefit activity is one that benefits all residents in a particular area, where at least 51% of the residents are low and moderate-income persons. Public infrastructure improvements are an area benefit activity when they are located in a predominately low- and moderate-income neighborhood.

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 will attempt to leverage HOME Consortium Funds, Grants and other funding when appropriate to meet the objective of the Annual Action Plan. The City does add local funds (including unexpended CDBG funds from prior years if available) to further support the organizations and individuals receiving CDBG funding. An example of potential local funds used will be Measure X . The Measure was placed on the ballot to address essential service priorities and needs in the City of Indio identified through community outreach. Measure X provides locally-controlled funding to help the City maintain essential City services including 911 emergency response times, road maintenance and police services including gang and drug enforcement programs.

The City is not a direct recipient of HOME Funds so matching funds are not required.

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
Number of Non-Homeless households to be provided affordable housing units	0	0
Number of Special-Needs households to be provided affordable housing units	0	0
Total	0	0

Table 5 – Number of Households

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

Table 6 – Number of Households Supported

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

The City does not receive HOME funds, so it did not fund any housing directly using federal funds; however, the City has met with affordable housing developers to consider housing sites. Currently, the housing market and lack of available local funds (especially since the loss of California Redevelopment housing funds) have affected affordable housing production.

In partnership with the County of Riverside Housing Authority, the City exceeded its annual goal of providing rental assistance units to residents (Table 7). However, the City did not have the goal of developing new affordable housing.

Like most communities, a major obstacle to meeting the needs of the homeless and developing new affordable units is funding. Over the years, community partnerships with county, state, and federal agencies have been integral to meeting the needs of the underserved community. However, with the dissolution of the Redevelopment Agencies in California under AB X1 26, Low/Moderate Income Housing Funds are no longer available to use for site assembly and other forms of assistance for affordable housing creation.

Discuss how these outcomes will impact future annual action plans.

The City does not receive HOME funds, so did not fund any housing directly; however, the City has met with affordable housing developers to consider housing sites. Currently, the housing market and lack of available local funds (especially since the loss of Redevelopment housing funds) have affected affordable housing production.

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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	0	0
Moderate-income	0	0
Total	0	0

Table 7 – Number of Households Served

Narrative Information

The City’s goal for the use of CDBG funding is to ensure the highest percentage served are low-income or below. In the 2019-20 fiscal year, 100% of the resident’s income category were low-income or

below. In its 2019 AAP, the City did not have the goal of using its CDBG allocation to provide affordable housing. Therefore, the table displaying the number of households assisted at each income level who received housing assistance during the program year should equal zero. However, other actions taken to foster and maintain affordable housing is the jurisdiction included working in close collaboration with the Housing Authority of the County of Riverside (HARC) to provide public housing within the City. Indio will continue to work independently and closely with the HA and local nonprofits to provide assistance to low-income families. As population demographics continue to change, the City will continue to work with the county housing authority and local (and regional) nonprofits to develop public housing projects in Indio. The City and the County of Riverside work together to provide the following Section 8 assistance:

- *Housing Choice Voucher Program*. HCV is the County's Section 8 voucher program, which includes other programs and services available to HCV participants, such as Moving to Work.
- *Moving to Work*. Moving to Work (MTW) is a demonstration program supported by HUD created to accomplish three (3) goals: 1) promote self-sufficiency among assisted families; 2) achieve program efficiency and reduce costs, and 3) increase housing choice for low-income households.

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

During the 2019 fiscal year, the City worked with the FIND Food Bank and Coachella Valley Rescue Mission to reach out and serve homeless persons. The City is also considering using dollars received from CDBG 1 and 2 to enhance services for these organizations as a result of additional clients effected by the Corona Virus.

The Consolidated Plan identified the City's priority needs and allocation priorities are homeless families with children; homeless individuals; and, a homeless subpopulation of chronically homeless. This was partially based on input from the homeless assistance providers that were consulted during the preparation of the Consolidated Plan, who indicated that families with children and individuals were the homeless most in need. The County of Riverside's *10-Year Strategic Plan to End Homelessness* has identified ending chronic and episodic homelessness as a high priority. The City's priority is the children of homeless families.

During the Reporting Period, the City CDBG public service funds to address the needs of homeless persons. These services were provided by the Coachella Valley Rescue Mission and Martha's Village and Kitchen—two prominent homeless shelters/service providers in the Coachella Valley. During the Reporting Period, the City also funded the FIND Food Bank, which provides valuable services to the homeless and near-homeless population.

Additionally, several local agencies provided outreach, referral and supportive services, and/or tenant rental assistance to over individuals during the Reporting Period. Those agencies included the County's Department of Mental Health, the Desert Outreach Program, and the Shelter Plus Care East Program, all supported/funded by the County's Continuum of Care Program.

Addressing the emergency shelter and transitional housing needs of homeless persons

During the Reporting Period, the City participated in monthly Committee and Sub-committee meetings of the Coachella Valley Association of Governments (CVAG) Homelessness Committee. The Committee was instrumental in creating a new homeless shelter in the west-end of the Coachella Valley several years ago. This has served to offset the cost of the east-end to address homelessness issues. This representation helps ensure the CVAG Homelessness Committee addresses homelessness issues in the east-end of the Coachella Valley. Also present in that meeting are County of Riverside's Mental Health and Continuum of Care Members that work collectively to address a variety of underserved needs in the Coachella Valley. Other service providers also serve as Ex-Officios and provide technical and specialized

support and information to the Committee.

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

During the Reporting Period, the City supported the efforts of the County of Riverside to end chronic and episodic homelessness. The City also supported the Coachella Valley Association of Government's (CVAG's) Eastern Coachella Valley Homeless Plan, which sought to address the service needs of the existing homeless shelters (Martha's Village and Kitchen, and the Coachella Valley Rescue Mission). The City also provided CDBG funds from previous program years to assist the Coachella Valley Rescue Mission.

While the City does not directly apply for Continuum of Care (CofC) funds, the City incorporated in the Consolidated Plan the County of Riverside recommendations and objectives for ending chronic homelessness. The objectives included street outreach, emergency shelter and transitional housing bed creation, permanent supportive housing creation, and permanently affordable housing creation.

During the Reporting Period, the City participated in monthly Committee and Sub-committee meetings of the Coachella Valley Association of Governments (CVAG) Homelessness Committee. The Committee was instrumental in creating a new homeless shelter in the west-end of the Coachella Valley several years ago. This has served to offset the cost of the east-end to address homelessness issues. One of the City's City Council Member served as the Chair of the Committee. This representation helped ensure the CVAG Homelessness Committee addresses homelessness issues in the east-end of the Coachella Valley, where Indio is located. Also present in that meeting are County of Riverside's Mental Health and Continuum of Care Members that work collectively to address a variety of underserved needs in the Coachella Valley. Other service providers also serve as Ex-Officios and provide technical and specialized support and information to the Committee.

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

The ABC Recovery Center and the Coachella Valley Rescue Mission provided transitional housing services. Both facilities are located in Indio and received HUD Supportive Housing Program (SHP) Grants Super NOFA Funds through the County of Riverside Continuum of Care, and provided services to families/individuals. As members of the CoC, the City works alongside these two agencies to ensure help to low-income individuals and families of Indio in avoiding becoming homeless, especially extremely low-income individuals and families

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

Actions were taken to address the needs of public housing

The City does not own or manage public housing units. The City cooperates with the County of Riverside Housing Authority to provide Section 8 housing assistance.

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

The City does not own or manage public housing units. The City cooperates with the County of Riverside Housing Authority to provide Section 8 housing assistance.

Actions taken to provide assistance to troubled PHAs

The City does not own or manage public housing units. The City cooperates with the County of Riverside Housing Authority to provide Section 8 housing assistance.

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)

Staff continued to monitor all regulations, ordinances, departmental processing procedures, and residential development fees to ensure these requirements do not excessively constrain affordable residential development. During the program year, density bonus incentives were made available as incentives to affordable housing developers. However, because of the downturn in the housing market, and the negative impact on affordable-housing construction, no development requested density bonus benefits or other concessions.

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

The City also participated in various Committees, Taskforces and Meeting Groups with other Cities and non-profit agencies to coordinate other services. For example, City staff participated in monthly meetings of the Coachella Valley Association of Governments (CVAG) Homelessness Committee Meetings, of which the current City Mayor serves as a Chair of the Committee. This representation in the CVAG Homelessness Committee ensures that homelessness issues are addressed in Indio. Also present in those meetings are County of Riverside's Mental Health and Continuum of Care Members that work collectively to address a variety of underserved needs in the Coachella Valley.

City staff also participates in the Coachella Valley Workforce Housing Trust Taskforce meetings as a way to work with other agencies and businesses (through a public/private partnership) to address the affordable and workforce housing needs on a regional basis. Staff also participated in Riverside County's Housing Program Network Meetings held in Riverside to discuss regional housing issues.

The City's Housing Programs Manager has been designated as the City's designated representative on the Continuum of Care Steering Committee with the County and participates in a multitude of related committees/subcommittees.

The City also spearheaded a sub-committee to conduct the Homeless Count and Survey of the sheltered and unsheltered homeless population every two years, with the last one occurring in January 2019. This was a requirement of the County of Riverside Continuum of Care. The City met multiple times with local stakeholders that would assist with the Count. The stakeholders included the County, local churches, the local homeless shelters, ABC Recovery Center and other volunteers. The County and Survey was a success.

Altogether, the City of Indio staff participated in a variety of programs and efforts to overcome possible gaps in institutional structure and enhance coordination. Staff also participated in HUD-sponsored workshops and training and worked with the County of Riverside and other Entitlement Communities in hopes of developing an informal peer-networking group.

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

To reduce lead in existing housing, and in order to prevent possible exposure to lead in City rehabilitation projects, Indio adhered to HUD guidelines for lead-safe work practices in all housing rehabilitation projects funded with Federal or non-Federal funds.

During the Reporting Period, Indio continued to implement and enforce the National-Lead Based Paint regulations, which require any type of home rehabilitation programs—regardless of funding source—to be tested for Lead-Based Paint (LBP). In order for the property to trigger the LBP test requirement threshold, it must be built pre-1978. This threshold also triggers a requirement that licensed contractors be certified by a federally-approved testing agency after taking an eight (8) hour class.

The LBP regulations require specific methods to be utilized to avoid disturbing surfaces that may contain LBP, and methods on how to properly contain an area that is under construction/rehabilitation.

Although the City does not utilize CDBG funds to complete residential rehabilitation, the City requires contractors that are participating in City programs to be certified and must provide a copy of their certificates.

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

The City's anti-poverty strategy includes continued support of the County's Section 8 rental assistance program and Family Self-Sufficiency Program. Referral services to these services were also included as the City's actions to reduce the number of persons living below the poverty level.

The Section 8 Program helped to reduce poverty by supplementing the income of lower-income families and making rental housing more affordable.

The City also continued to support the Housing Authority's Family Self-Sufficiency (FSS) Program. The FSS Program is designed to help Housing Authority tenants become self-sufficient in a five-year period. A primary benefit of the FSS is asset accumulation. The outcome evaluation of this service is ongoing, as participants participate in a long term process to become self-sufficient.

The City also provided support to the Riverside County Continuum of Care (CoC) to conduct its Homeless Count of veterans.

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

During the planning period, the City's Economic Development Department maintained primary management as well as the coordination of the various organizations involved in these processes. The staff within the Department worked closely with other City departments and the community to develop programs and activities to improve low- and moderate-income neighborhoods throughout Indio. The administration of program activities includes housing, public facility and infrastructure improvements, public and social service activities and economic development activities. The City collaborated with public agencies, for-profit agencies, and non-profit organizations in order to provide the aforementioned programming and services.

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

During the Reporting Period, the City of Indio partnered with Inland Fair Housing and Mediation Board to provide specialized fair housing-related services to residents. By partnering with Inland Fair Housing and Mediation Board, and providing the services out of the City's new Housing Resource Center, the City was able to increase/enhance community access to these services and, thus, provide adequate service delivery. Tenant/landlord mediation and other Fair Housing Services were previously provided by the Fair Housing Council of Riverside County (a different agency), which provided services out of an office in Palm Springs—approximately 25 miles away from Indio. This continued access to services has served to streamline the service delivery process and help Indio residents attain the necessary services with ease and convenience. City CDBG staff and staff from Inland Fair Housing and Mediation Board are infrequent communications regarding referrals and administration/operation issues that may arise. The City is confident of Inland Fair Housing's abilities and knowledge, as they are a reputable partner with at least 14 other southern California Cities, of which most utilize CDBG funds to pay for their services.

The City also participated in various Committees, Taskforces and Meeting Groups with other Cities and non-profit agencies to coordinate other services. For example, City staff participated in monthly meetings of the Coachella Valley Association of Governments (CVAG) Homelessness Committee Meetings, of which the previous City Mayor served as a Chair of the Committee. This representation in the CVAG Homelessness Committee ensures that homelessness issues are addressed in Indio. Also present in those meetings are County of Riverside's Mental Health and Continuum of Care Members

that work collectively to address a variety of underserved needs in the Coachella Valley.

Altogether, the City of Indio staff participated in a variety of programs and efforts to overcome possible gaps in institutional structure and enhance coordination. Staff also participated in HUD-sponsored workshops and training and worked with the County of Riverside and other Entitlement Communities in hopes of developing an informal peer-networking group.

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

Housing Choice for Special Populations

Actions taken: The City continued to promote the construction of affordable for-sale and/or rental housing units with three or more bedroom units affordable to very low- and low-income families. The City shall publicize financial and regulatory incentive opportunities to developers for these unit types including promoting the need for three or more bedroom units during pre-application meetings, contacting affordable housing developers, and creating informational fliers at the Community Development Department and in all general application packets.

Education and Resources

Actions taken: Through the Inland Fair Housing and Mediation Board, the City worked with other fair housing advocates to conduct additional fair housing workshops in Indio to educate about fair housing rights.

Unfair Lending and Insurance Practices

Action Taken: Through the Inland Fair Housing and Mediation Board, the City monitored complaints regarding unfair/predatory lending and assessed lending patterns using the data collected under the Home Mortgage Disclosure Act (HMDA), the Community Reinvestment Act (CRA) and other data sources.

Apartment Owners/Managers Fair Housing Education

Actions taken: Through the Inland Fair Housing and Mediation Board, the City worked in conjunction with apartment owner/manager associations to outreach to owners of small rental properties regarding fair housing laws.

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 Housing & Neighborhood Services Division is responsible for ensuring that the receipt and expenditure of HUD funds comply with program requirements through the monitoring of program performance. Careful evaluation of the housing and public service delivery system can be the most effective tool in detecting gaps and making appropriate modifications. Indio will follow monitoring procedures identified in the City's Sub-recipient Monitoring Plan created in 2013. Other procedures will include in-house review of progress reports and expenditures, and on-site visits to ensure compliance with federal regulations. The monitoring system will encourage uniform reporting to achieve consistent information on beneficiaries. Monitoring will also aim at resolving any program or accounting findings or other problems that may keep an organization from meeting its contractual obligations. Technical assistance will be provided where necessary.

Furthermore, project and financial data on CDBG-funded activities will be maintained using HUD's IDIS (Integrated Disbursement Information System) software. The use of this system allows HUD staff easy access to local data for review and progress evaluation.

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.

As a prerequisite to submitting its CAPER, the City must adhere to the citizen/community participation requirements as specified in the City's adopted Citizen Participation Plan. Accordingly, the draft CAPER was made available to the general public for a period of not less than 15 days in order to provide them with an opportunity to review the document and/or express their views/concerns regarding the City's performance in the use of CDBG Funds. A reasonable number of free copies of the CAPER were made available to citizens and groups upon request. The City considered any comments or views of citizens received. No comments or views were provided.

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.

There are no changes in the City's program objectives.

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

No

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

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.

There are no changes in the City's program objectives.

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

No

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