



**Draft
Consolidated Annual
Performance &
Evaluation Report**

FY 2022-2023



Public Review & Comment
September 12, 2023



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Version History

No.	Summary of Changes			
1	Published Draft for Public Comment:	8/24/23	Sent to HUD for Approval:	9/28/23
	Conducted Public Hearing:	9/12/23	Approved by HUD:	TBD
	Original 2022-2023 Consolidated Annual Performance and Evaluation Report (CAPER)			

Progress Report

CR-05 - Goals and Outcomes

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

This 2022-2023 Consolidated Annual Performance and Evaluation Report (CAPER) is the City of Hawthorne's report to the U.S. Department of Housing and Urban Development (HUD) describing the use of federal Community Development Block Grant (CDBG) and Home Investment Partnership (HOME) funds. The CDBG program provides a wide range of eligible activities that provide decent housing, suitable living environments and expanded economic opportunities for low- and moderate-income persons. The HOME program expands the supply of affordable housing for low- and moderate-income households through a variety of affordable housing activities, including building, buying, and/or rehabilitating rental and ownership housing or providing direct rental assistance to low- and moderate-income households.

The five-year Consolidated Plan establishes priorities and goals used to guide decisions about the specific projects and activities that receive CDBG and HOME funding every year in the Annual Action Plan. The City of Hawthorne implements some projects and activities directly and awards funds to non-profit or public organizations that implement programs in furtherance of the Consolidated Plan goals.

This CAPER provides the City's progress report for the third Program Year of the 2020-2024 Consolidated Plan, covering the period from July 1, 2022, to June 30, 2023. For the 2022-2023 Program Year, the City received \$1,222,487 of CDBG funds and \$684,231 of HOME funds from HUD. When combined with program income and available prior year resources, the 2022-2023 Action Plan allocated \$1,437,472 of CDBG funds and \$4,624,958.47 of HOME funds to local projects. Together with other federal, state and local investments, HUD resources allowed the City and its partners to address the high priority needs identified in the 2020-2024 Consolidated Plan.

Table 1 provides a summary of the five-year goals, one-year goals, and one-year accomplishments for the period ending June 30, 2023, arranged by each of the Strategic Plan Goals included in the 2020-2024 Strategic Plan of the Consolidated Plan.

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

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

Goal	Category	22-23 Amount	Indicator	Unit of Measure	5-Year Strategic Plan			2022-2023 Program Year 3		
					Expected	Actual	Percent Complete	Expected	Actual	Percent Complete
Affordable Housing Preservation	Affordable housing	CDBG: \$630,766.00	Homeowner housing rehabilitation	Household housing unit	30	9	30%	8	4	50%
		HOME: \$2,500,000.00	Rental housing rehabilitation	Household housing unit	18	0	0%	18	0	0%
Affordable Housing Development	Affordable housing	HOME: \$1,774,872.47	Affordable housing development	Household housing unit	4	0	0%	2	0	0%
Fair Housing Services	Affordable housing	CDBG: \$30,000.00	Public service activities other than low/mod-income housing benefit	Other	1,750	596	34.1%	250	232	92.8%
Public Services	Non-housing community development	CDBG: \$183,373.00	Public service activities other than low/mod-income housing benefit	Persons assisted	1,500	913	60.9%	295	336	113.9%

Public Facilities and Infrastructure Improvements	Non-housing community development	CDBG: \$378,836.00	Public facility or infrastructure activities other than low/mod-income housing benefit	Other: Section 108 Loan Repayment	4	3	75%	1	1	100%
Economic Development Opportunities	Non-housing community development	CDBG: \$870,000.00	Façade treatment / business building rehabilitation	Businesses assisted	5	0	0%	5	0	0%
		CDBG: \$421,093.00	Jobs created / retained	Persons assisted	11	0	0%	11	0	0%
COVID-19 Response	Non-housing community development	CDBG-CV: \$1,712,974.00	COVID-19 Impact	Persons assisted	30	12	40%	10	12	120%
				Temporary non-congregate shelter units	15	12	80%	15	12	80%
				Households assisted	105	123	87.62%	105	123	4.76%

				Businesses assisted	11	6	54.5%	11	6	54.5%
				Jobs created/retained	6	2	33.3%	6	2	33.3%
Program Planning and Administration	N/A	CDBG: \$214,497.00 HOME: \$68,423.00	N/A	Other	5	3	60%	1	1	100%

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.

Each of the housing, public service, and capital improvement activities receiving CDBG and HOME funds in the City’s Action Plan address specific high priority needs identified in the 2020-2024 Consolidated Plan. Table 1 on the previous page provides a summary of the City’s accomplishments and the one- and five-year goals of the 2022-2023 Action Plan and the 2020-2024 Consolidated Plan, respectively, as of June 30, 2023. Based on the information in Table 1, the City and its housing and community development partners made progress towards five of seven goals included in the 2020-2024 Consolidated Plan. . The program accomplishments for each category are discussed below:

- **Affordable Housing Preservation:** The City of Hawthorne Housing Rehabilitation Program completed four (4) housing rehabilitation projects to address deficient housing conditions and preserve the existing housing stock that is affordable to low- and moderate-income homeowners.
- **Fair Housing Services:** The Fair Housing Foundation provided 232 Hawthorne residents with fair housing and landlord-tenant mediation services.
- **Public Services:** Three (3) non-profit organizations provided a range of services to Hawthorne residents including but not limited to providing after-school enrichment activities for 137 low- and moderate-income school children, case management and emergency assistance to 164 extremely low- and low-income residents, and domestic violence services for 35 Hawthorne residents.
- **Public Facilities and Infrastructure Improvements:** The City of Hawthorne completed the second to last repayment of its Section 108 Loan. The final repayment of \$369,517.50 will be issued during the 2023-2024 program year.
- **COVID-19 Response:** CDBG-CV funds were used to address housing and economic development needs of Hawthorne residents. The housing component of these activities included short-term rental and utility assistance to 123 income eligible households. The economic development components included financial assistance in the form of grants to 2 small business and 6 microenterprises. Lastly, the City included a homelessness component to provide transitional housing for 12 homeless residents.

Each of the activities that were underway during the 2022-2023 Program Year are listed in Figure 1 on the following page, including the amount of funds allocated to the activity and the amount spent as of June 30, 2023. Figure 2 provides the numeric accomplishment goal for each activity and the level of accomplishment as of June 30, 2023.

Figure 1 - Use of CDBG& HOME Funds

Strategic Plan Goal / Activity	Source	Allocation	Spent through 6/30/23	Percent Spent
1. Affordable Housing Preservation				
^Housing Rehabilitation Program	CDBG	\$630,766.00	\$212,089.01	33.6%
^Rental Rehabilitation Program	HOME	\$2,500,000.00	\$0.00	0.0%
	Subtotal	\$3,130,766.00	\$212,089.01	6.8%%
2. Affordable Housing Development				
^Acquisition, Rehabilitation, Resale	HOME	\$1,774,872.47	\$0.00	0%
^CHDO: Set-Aside	HOME	\$281,663.00	\$0.00	0%
	Subtotal	\$2,056,535.47	\$0.00	0%
3. Fair Housing Services				
FHF: Fair Housing Services	CDBG	\$30,000.00	\$30,000.00	100.0%
	Subtotal	\$30,000.00	\$30,000.00	100.0%
4. Public Services				
SBWIB: Teen Center	CDBG	\$96,741.00	\$89,027.05	92.0%
NSFC: Domestic Violence Services	CDBG	\$29,022.00	\$28,087.42	96.8%
CCLA: Emergency Assistance	CDBG	\$22,440.00	\$22,400.01	99.8%
	Subtotal	\$148,203.00	\$1139,514.48	94.1%
5. Public Facilities and Infrastructure Improvements				
Section 108 Loan Repayment	CDBG	\$378,836.25	\$378,836.25	100.0%
^Commercial Façade Improvements	CDBG	\$1,291,093.00	\$35,007.25	2.7%
	Subtotal	\$1,669,929.25	\$413,843.50	24.8%
6. Planning and Administration				
HOME Program Administration	HOME	\$68,423.00	\$26,948.29	39.4%
CDBG Program Administration	CDBG	\$214,497.00	\$175,197.73	81.7%
	Subtotal	\$282,920.00	\$202,146.02	71.4%
	Total	\$6,027,260.72	\$997,593.01	16.6%
NOTES:				
^ Projects will continue in 2023-2024 and will be reported in the next CAPER.				
<i>Expenditures are subject to increase as the City accrues expenses for 2022-2023. This table will be updated prior to submission to HUD.</i>				

Figure 2 - Program Year Accomplishments by Strategic Plan Goal

Strategic Plan Goal / Activity	Unit of Measure	Expected	Actual
1. Affordable Housing Preservation			
^Housing Rehabilitation Program	Housing Unit	8	4
^Rental Rehabilitation Program	Housing Unit	18	0
2. Affordable Housing Development			
^Acquisition, Rehabilitation, Resale	Housing Unit	2	0
3. Fair Housing Services			
FHF: Fair Housing Services	Other	250	232
4. Public Services			
SBWIB: Teen Center	People	90	137
NSFC: Domestic Violence Program	People	35	35
CCLA: Emergency Assistance	People	145	164
5. Public Facilities and Infrastructure Improvements			
Section 108 Loan Repayment	Other	1	1
6. Economic Development Opportunities			
^Commercial Façade Improvements	Businesses	12	0
7. Planning and Administration			
HOME Program Administration	Other	1	1
CDBG Program Administration	Other	1	1
NOTES:			
^ Projects will continue in 2023-2024 and will be reported in the next CAPER.			
<i>Accomplishments are subject to change as the City reconciles subrecipient performance reports for 2022-2023. This table will be updated prior to submission to HUD.</i>			

COVID-19 Allocation

In response to the COVID-19 pandemic, Congress passed the Coronavirus Aid, Relief, and Economic Securities (CARES) Act and it was signed into law on March 27, 2020 authorizing \$2.2 trillion for a variety of measures to prevent, prepare for, and respond to the COVID-19 pandemic. Under the CARES Act, HUD provided special allocations of CDBG funds to the City of Hawthorne. In total, the City received \$1,712,974 of CDBG-CV funds to prevent, prepare for, and respond to the COVID-19 pandemic.

CDBG-CV funds must be fully spent by December 7, 2026. The City has made significant progress towards its expenditure and accomplishment goals. Each of the CDBG-CV activities approved by the City Council are summarized in Figure 3 below, including the amount of funds allocated to the activity and the amount spent as of June 30, 2023. Figure 4 provides the numeric accomplishment goal for each activity and the level of accomplishment as of June 30, 2023.

Figure 3 - Use of CDBG-CV Funds

Strategic Plan Goal / Activity	Source	Allocation	Spent through 6/30/23	Percent Spent
1. COVID-19 Response				
FPOSB: Homelessness Prevention	CDBG-CV	\$30,000.00	\$8,593.03	28.6%
Emergency Housing Assistance	CDBG-CV	\$535,955.00	\$535,955.00	100.0%
Homeless Center	CDBG-CV	\$617,262.00	\$599,262.00	97.1%
Small Business Assistance	CDBG-CV	\$117,163.00	\$49,326.00	42.1%
Microenterprise Assistance	CDBG-CV	\$70,000.00	\$60,000.00	85.7%
	Subtotal	\$1,370,380.00	\$1,253,136.03	91.4%
2. Planning and Administration				
CDBG-CV Administration	CDBG-CV	\$342,594.00	\$181,235.94	52.9%
	Subtotal	\$342,594.00	\$181,235.94	52.9%
	Total	\$1,712,974.00	\$1,434,371.97	83.7%
NOTES: <i>Expenditures are subject to increase as the City accrues expenses for 2022-2023. This table will be updated prior to submission to HUD.</i>				

Figure 4 - Program Year Accomplishments by Strategic Plan Goal

Strategic Plan Goal / Activity	Unit of Measure	Expected	Actual
1. COVID-19 Response			
FPOSB: Homelessness Prevention	People	10	24
Emergency Housing Assistance	Households	105	123
Homeless Center	Housing Units	15	12
Small Business Assistance	Jobs	6	2
Microenterprise Assistance	Businesses	11	6
NOTES: <i>Accomplishments are subject to change as the City reconciles performance reports for 2022-2023. This table will be updated prior to submission to HUD.</i>			

HOME-ARP Allocations

The City of Hawthorne received \$2,166,698.00 of HOME American Rescue Plan (HOME-ARP) funds from HUD under the 2021 Action Plan. The City's substantial amendment to the 2021 Action Plan to incorporate the HOME-ARP allocation was approved on May 24, 2022. At this time, the City is developing procedures and identifying next steps for HOME-ARP implementation.

CR-10 - Racial and Ethnic composition of families assisted

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

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

	CDBG
White	63
Black or African American	151
Asian	9
American Indian/Alaskan Native	78
American Indian or Alaskan Native & White	0
Asian & White	1
Amer. Indian/Alaskan Native & Black/African Amer.	0
Other multi-racial	38
Total	340
Hispanic	165
Non-Hispanic	175
NOTES: The data in this table is supplied by HUD's database. The figures in this table represent the sum of the reported number of people, families, households, or housing units reported during the Program Year, without regard to the number of people in each family, household or housing unit. Additionally, the data in this table is only inclusive of activities that have been completed.	

Narrative

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

CR-15 - Resources and Investments 91.520(a)

Identify the resources made available

Table 3 - Resources Made Available

Source of Funds	Resources Made Available	Amount Expended During Program Year
CDBG	\$1,437,472.00	\$942,611.22
HOME	\$4,624,958.47	\$26,948.29
CDBG-CV	\$1,712,974.00	\$767,532.12
NOTES: This table generated by HUD's database provides the resources made available in the 2022-2023 Action Plan and the total CDBG, HOME, and CDBG-CV expenditures during the 2022-2023 Program Year. The amount expended includes prior year activities that were completed during the 2022-2023 Program Year.		

Narrative

The 2022-2023 HUD formula grant resources allocated in the Action Plan for the implementation of projects are identified in Table 3. The total resources allocated in the 2022-2023 Action Plan includes \$1,437,472.00 of CDBG funds and \$4,626,958.47 of HOME funds. A grand total of \$6,064,430.47 of CDBG and HOME funds were allocated to projects in the 2022-2023 Action Plan. Together with other federal, state, and local investments, these resources allowed the City and its partners to address the high priority needs identified in the 2020-2024 Consolidated Plan.

Identify the geographic distribution and location of investments

Table 4 – Identify the geographic distribution and location of investments

Target Area	Planned Percentage of Allocation	Actual Percentage of Allocation	Narrative Description
Citywide	100%	100%	All projects were Citywide
NOTES: The data in this table is generated by HUD's database. The City did not designate specific CDBG or HOME target areas in the 2020-2024 Consolidated Plan; therefore, 100 percent of all CDBG and HOME funds are represented under the "Citywide Area" designation.			

Narrative

During the 2022-2023 Program Year, the City allocated 100 percent of its non-administrative CDBG and HOME funds to projects and activities that benefit low- and moderate-income persons throughout the City of Hawthorne.

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.

To address housing and community development needs in Hawthorne, CDBG and HOME entitlement grants are used to leverage a variety of funding resources to maximize the effectiveness of available funds. The CDBG public service activities leveraged private, state, and other federal funds to deliver services for low- and moderate-income people.

During the program year, the City identified five (5) city-owned apartment complexes containing 38 units at various locations in the City of Hawthorne to address the need to preserve the supply of affordable housing. More specifically, the 2022-2023 Action Plan invested HOME funds to rehabilitate three (3) of these properties comprised of 18 units that are occupied by very low- and low-income tenants. To ensure the feasibility of the project, the City leveraged additional resources from the State's Permanent Local Housing Allocation (PLHA)_program as well as HUD's Economic Development Initiative (EDI) Community Project Fund (CPF) program. Additional leveraging opportunities include, but are not limited to, those listed below.

Federal Resources

- Continuum of Care (CoC) Program
- HUD Veterans Affairs Supportive Housing (HUD-VASH)
- Housing Opportunities for Persons with AIDS (HOPWA)
- Youthbuild
- HUD Economic Development Initiative (HUD-EDI)
- Supportive Housing for the Elderly (Section 202)
- Supportive Housing for Persons with Disabilities (Section 811)
- Federal Low-Income Housing Tax Credit Program
- Department of Transportation Grants
- Department of Energy Grants
- Federal Highway Administration
- Project Roomkey

State Resources

- Building Equity and Growth in Neighborhoods Program (BEGIN)
- Multifamily Housing Program (MHP)
- CalHFA Single and Multi-Family Program
- California HCD Permanent Local Housing Allocation (PLHA)
- State Low-Income Housing Tax Credit Program
- CalHOME Program
- Housing Related Parks Grant
- Mental Health Service Act (MHSA) Funding
- Prop 47 – Board of State & Community Corrections
- Justice Assistance Grant (JAG) Program
- Homeless Emergency Aid Program (HEAP)
- Project Roomkey

Local Resources

- Los Angeles Homeless Services Authority (LAHSA)
- Los Angeles Community Development Agency (LACDA)
- Southern California Home Financing Authority (SCHFA)
- General Fund

Private Resources

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

Matching Requirements

HUD requires HOME Participating Jurisdictions (PJ's) to match 25 percent of their HOME annual allocation on a Federal Fiscal Year (FFY) basis. The City of Hawthorne requested a match reduction under the COVID-19 waiver which was approved by HUD. As a result, the City received a 100 percent reduction of its match liabilities for fiscal years 2020, 2021, and 2022.

Table 5 – Fiscal Year Summary - HOME Match Report

Fiscal Year Summary – HOME Match	
1. Excess match from prior Federal Fiscal Year	\$0.00
2. Match contributed during current Federal Fiscal Year	\$0.00
3. Total match available for current Federal Fiscal Year (Line 1 plus Line 2)	\$0.00
4. Match liability for current Federal Fiscal Year	\$0.00
5. Excess match carried over to next Federal Fiscal Year (Line 3 minus Line 4)	\$0.00

Table 6 – Match Contribution for the Federal Fiscal Year

Match Contribution for the Federal Fiscal Year								
Project No. or Other ID	Date of Contrib.	Cash (non-Federal sources)	Foregone Taxes, Fees, Charges	Appraised Land/Real Property	Required Infrastructure	Site Prep., Const. Materials, Donated labor	Bond Financing	Total Match
-	-	\$0	\$0	\$0	\$0	\$0	\$0	\$0

Table 7 – HOME Program Income

HOME Program Income – Enter the program amounts for the reporting period				
Balance on hand at beginning of reporting period	Amount received during reporting period	Total amount expended during reporting period	Amount expended for TBRA	Balance on hand at end of reporting period
\$490,493.12	\$0.00	\$0	\$0	\$490,493.12

HOME MBE/WBE report

Minority Business Enterprises and Women Business Enterprises – Indicate the number and dollar value of contracts for HOME projects completed during the reporting period

Table 8 – Minority Business and Women Business Enterprises

	Total	Minority Business Enterprises				White Non-Hispanic
		Alaskan Native or American Indian	Asian or Pacific Islander	Black Non-Hispanic	Hispanic	
Contracts						
Number	0	0	0	0	0	0
Dollar Amount	\$0	\$0	\$0	\$0	\$0	\$0
Sub-Contracts						
Number	0	0	0	0	0	0
Dollar Amount	\$0	\$0	\$0	\$0	\$0	\$0
	Total	Women Business Enterprises		Male		
Contracts						
Number	0	0		0		
Dollar Amount	\$0	\$0		\$0		
Sub-Contracts						
Number	0	0		0		
Dollar Amount	\$0	\$0		\$0		

Minority Owners of Rental Property – Indicate the number of HOME assisted rental property owners and the total amount of HOME funds in these rental properties assisted

Table 9 – Minority Owners of Rental Property

	Total	Minority Owners				White Non-Hispanic
		Alaskan Native or American Indian	Asian or Pacific Islander	Black Non-Hispanic	Hispanic	
Number	0	0	0	0	0	0
Dollar Amount	\$0	\$0	\$0	\$0	\$0	\$0

Relocation and Real Property Acquisition – Indicate the number of persons displaced, the cost of relocation payments, the number of parcels acquired and the cost of acquisition

Table 10 – Relocation and Real Property Acquisition

Parcels Acquired	0	\$0
Businesses Displaced	0	\$0
Nonprofit Organizations Displaced	0	\$0
Households Temporarily Relocated, not Displaced	0	\$0

Households Displaced	Total	Minority Property Enterprises				White Non-Hispanic
		Alaskan Native or American Indian	Asian or Pacific Islander	Black Non-Hispanic	Hispanic	
Number	0	0	0	0	0	0
Cost	\$0	\$0	\$0	\$0	\$0	\$0

CR-20 - Affordable Housing 91.520(b)

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

Table 11 - Number of Households

	One-Year Goal	Actual
Number of Homeless households to be provided affordable housing units	15	12
Number of Non-Homeless households to be provided affordable housing units	173	168
Number of Special-Needs households to be provided affordable housing units	0	0
Total	188	180

Table 12 - Number of Households Supported

	One-Year Goal	Actual
Number of households supported through Rental Assistance	145	164
Number of households supported through The Production of New Units	15	12
Number of households supported through Rehab of Existing Units	26	4
Number of households supported through Acquisition of Existing Units	2	0
Total	188	180

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

Two high priority affordable housing goals were identified in the 2020-2024 Consolidated Plan to provide the framework necessary to invest CDBG and HOME funds to address affordable housing needs. These include Affordable Housing Preservation and Affordable Housing Development. Tables 11 and 12 indicate the number of households supported with affordable housing assistance through the CDBG and HOME programs during the 2022-2023 Program Year.

As the City's housing stock ages, a growing percentage of housing units may need rehabilitation to allow them to remain safe and habitable. The situation is of particular concern for low- and moderate-income homeowners who are generally not in a financial position to properly maintain their homes. During the program year, the City completed four (4) homeowner housing rehabilitation projects. Affordable housing renovations are typically multi-year projects and are subject to the ability to secure funding from various sources. Often, the ability to meet the anticipated goals is dictated by various factors that can create

disparities between goals and actual outcomes such as: funding availability, costs of raw materials, timing, and project schedules. Unexpected challenges are commonly encountered during the repair phase of the project which causes delays that impact project delivery.

To increase the supply of affordable housing, the 2022-2023 Action Plan allocated \$1,774,872.47 of HOME funds towards an acquisition, rehabilitation, resale activity. Of the federal resources available, HOME funding provides the most viable resource due to the amount of funding available, however is burdened with considerable regulatory compliance requirements. This is further exacerbated by the current real estate market that provides a limited inventory of properties that meet the pricing requirements of the HOME program. As a result, the City was unable to reach its intended goal of acquiring, rehabilitating, and reselling two (2) units to income-qualified residents.

In addition, the 2022-2023 Action Plan identified a project that would invest \$2,500,000 in HOME funds to rehabilitate three (3) city-owned properties comprised of 18-units occupied by very low- and low-income residents. Since the start of the program year, the City attempted to solicit bids from qualified contractors on three (3) separate occasions. In response to the first Notice Inviting Bids (NIB), the City did not receive any bids. In response to the second NIB, the City received two (2) bids that were nearly twice as much as the City's independent cost estimate. As such, the City decided to split the project into two phases. The first half will focus on the exterior façade improvements, whereas the second half will focus on the interior rehabilitation work. Thereafter, the City published and advertised the third NIB. While there were 12 interested contractors present at the pre-bid job walk, only one (1) contractor submitted a bid. After reviewing the submitted bid, the City deemed the proposed price to be reasonable and the contractor to be qualified. Through its procurement process, the City showed that after solicitation of a number of sources, competition was determined inadequate. In this instance, HUD approved the City's request for a noncompetitive procurement for this specific instance to facilitate the project moving forward.

Discuss how these outcomes will impact future annual action plans.

The 2020-2024 Consolidated Plan identified a high priority need to preserve the supply to affordable housing. During the 2022-2023 Program Year, the City of Hawthorne invested CDBG funds in the rehabilitation of owner-occupied housing units. Four (4) projects are being counted in FY 2022-2023. In future Action Plans, the City anticipates continuing to invest in affordable housing preservation and in projects that will create new affordable housing opportunities for low-and moderate-income residents.

In addition, during the 2022-2023 program year, the City awarded CDBG funds to Catholic Charities of Los Angeles who was able to provide emergency assistance services to 164 unduplicated residents by providing financial assistance in the form of rental, rental arrear, and utility payments.

As community needs change the City may need to undertake additional activities to best achieve the City's ability to meet its affordable housing goals. All future Annual Action Plans will provide additional information on any on-going affordable housing activities and the City will continue to assess and determine affordable housing needs that best utilize available funding sources.

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

Table 13 - Number of Households Served

Number of Households Served	CDBG Actual
Extremely Low-income	155
Low-income	24
Moderate-income	1
Total	180

Narrative Information

The 2020-2024 Consolidated Plan identified high priority affordable housing needs including developing new affordable housing units and preserving the supply of affordable owner-occupied housing. To preserve housing that is already affordable to low- and moderate-income homeowners, the City’s Housing Rehabilitation Program provided 4 grants and 1 loan to 3 households during the Program Year. The 3 households served were low-income households.

To address what HUD defines as “worst case housing need” the City provided funds in the 2022-2023 Action Plan for the preservation of the physical and functional integrity of existing housing units occupied by low- and extremely low-income residents who would otherwise continue to live in substandard housing because they were not in the financial position to properly maintain their home. This includes attempts to meet the needs of persons with disabilities by making necessary improvements which aid the mobility of the elderly and physically disabled such as shower units with seats, handrails, ramping and reconstructing doorways.

Addressing substandard housing conditions through housing preservation activities is a cost-effective way to invest limited resources to retain housing units that are already affordable to low- and moderate-income residents and ensure all economic segments of the community have the opportunity to live in decent housing.

In future Action Plans, the City anticipates continuing to invest CDBG and HOME funds to address both the preservation and development of affordable housing. As community needs change, the City may need to undertake additional activities to facilitate the City’s ability to meet its affordable housing goals. All future Annual Action Plan will provide additional information on any ongoing affordable housing activities and the City will continue to assess and determine affordable housing needs that best utilize available funding sources.

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

The Los Angeles County Point-In-Time Homeless Count (PIT Count) conducted in 2023 revealed that on any given night in Los Angeles County, approximately 75,518 people are homeless, up from 69,144 counted in a prior effort undertaken in 2022. This includes 20,363 people in shelters and 55,155 people without shelter. In Service Provision Area 8 (SPA 8), of which Hawthorne is a part of, 6,476 homeless residents were counted, comprising approximately 8.6 percent of Los Angeles County's homeless population.

To reach out to unsheltered homeless persons and assess their individual needs for the purpose of connecting them with available emergency shelter and transitional housing resources, the City of Hawthorne, through its Housing Department provided information and referrals – primarily to the Los Angeles County Continuum of Care (CoC) led by the Los Angeles Homeless Services Authority (LAHSA), United Way 2-1-1, and the organizations receiving CDBG funds for homelessness prevention activities.

The Los Angeles CoC has continued to implement a public-facing online system called the Los Angeles Homeless Outreach Portal (LA-HOP) for community stakeholders to inform the outreach system of persons experiencing unsheltered homelessness in need of services. Requests go to a centralized platform and are then routed to the regional Coordinated Entry System (CES). CoC coordinators then triage the requests and ensure that outreach teams are deployed to contact the individual experiencing homelessness within 72 hours of the request.

During the 2022-2023 Program Year, the City awarded two (2) contracts to non-profit organization using CDBG funds totaling \$51,462.00 to meet its respective objectives to provide public services that prevent and eliminate homelessness.

- New Star Family Center: Domestic Violence Services (35 residents served)
- Catholic Charities of Los Angeles: St. Margaret's Emergency Assistance (164 residents served)

Additionally, the City's Recreation and Community Services Department continues to partner with public service providers that offer a variety of programs to those who are homeless or at-risk of becoming homeless.

Addressing the emergency shelter and transitional housing needs of homeless persons

To address the emergency shelter and transitional housing needs of homeless persons, the City continues to support the New Star Family Center which provides emergency shelter and transitional housing assistance, counseling, and case management for survivors of domestic violence and their children who have are homeless or at-risk of homelessness after fleeing violent homes. During the Program Year, New Star Family Justice Center served 35 unduplicated persons via its Domestic Violence Services and Prevention program.

Additionally, the City supports the Family Promise of South Bay with CDBG-CV funds which provides emergency shelter and supportive services for Hawthorne residents who have become homeless or are at-risk homelessness. During the Program Year, Family Promise of the South Bay assisted 12 unduplicated families.

Lastly, as part of its CDBG-CV program, the City invested \$617,262 to develop the Bridge of Hope community comprised of 12 pallet shelters to be utilized as transitional housing for homeless Hawthorne residents.

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

The COVID-19 pandemic resulted in significant business closures and other disruptions that put the City's residents at risk of losing their housing. To help low-income individuals and families avoid becoming homeless, the e City partnered with Catholic Charities of Los Angeles to connect residents at risk of becoming homeless to existing short-term housing and utility assistance programs based on their eligibility and need. As a result of these efforts, Catholic Charities of Los Angeles was able to assist 164 people, of which 143 were extremely low-income individuals and families who represent the highest risk of becoming homeless.

SB 1152 requires hospitals to develop written homeless patient discharging planning policy that coordinates services and referrals with regional social service agencies, medical care, and county behavioral health services.

Inadequate discharge planning and coordination contributes to homelessness in situations where people are released from public institutions or public systems of care without having an appropriate mainstream or supportive housing option available upon discharge from an institutional setting. Public institutions such as jails, hospitals, treatment facilities, mental health facilities, youth facilities, and foster care homes are central to limiting the creation of newly homeless persons upon discharge.

In California, discharge coordination and planning is largely unregulated unless county or municipal ordinances provide rules preventing public institutions from discharging people into homelessness. One of the goals included in the Los Angeles Ten Year Strategy to End Homelessness is to formalize protocols and improve the coordination of discharge planning among key institutional systems of care and supervision. The goal calls for the CoC to close the “revolving door” to homelessness so that new persons do not find themselves living in the community without the social and economic support necessary to access and maintain themselves in a safe environment.

The City coordinated with the CoC and other subrecipients receiving CDBG funds to ensure that its HUD-funded programs are targeted, to the greatest extent feasible, to address the discharge of persons from publicly funded institutions or systems of care so that these individuals and families have access to public services and affordable housing opportunities necessary to prevent homelessness. The City will continue to explore additional ways to prevent and address homelessness caused by discharge from public institutions.

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

To address the needs of homeless families, families with children, veterans and their families, the City provided \$51,462.00 of CDBG funds for public service programs through two (2) contracts with non-profit organizations. These programs help individuals and families achieve stability by connecting them to the appropriate resources based on their needs.

Each of these programs provide tailored counseling and case management services to people experiencing homelessness or at-risk of homelessness. During the program year, New Star Family Center served 35 unduplicated persons through its domestic violence prevention services program. Additionally, Catholic Charities of Los Angeles assisted 164 unduplicated people through its emergency assistance program. When paired with financial counseling, career coaching, and other available case management services, Hawthorne’s non-profit partners make certain that individuals and families have the tools necessary to succeed.

Additionally, the City’s partnership with LAHSA provides intensive, field-based engagement services and support that meets clients and their families where they live. As a result, the City has been able to leverage its partnerships with the County agencies to bolster its homeless outreach.

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

Actions taken to address the needs of public housing

There are no public housing developments in Hawthorne. The City of Hawthorne Housing Authority is responsible for administering the Section 8 Housing Choice Voucher program. Currently, the Housing Authority is assisting 1,160 families who are low-income and do not earn enough to keep pace with rising rental housing costs.

All other public housing programs consist of Housing Choice and Project-Based Housing Choice Vouchers administered by the Los Angeles Community Development Agency (LACDA). The City of Hawthorne Housing Authority has continued to support LACDA in effective administration of its limited affordable housing resources. More specifically, the City worked with LACDA to include residents with Section 8 Housing Choice Vouchers in the federally-funded programs administered by the City.

As of June 30, 2021, LACDA administered a total of 97,152 Housing Choice Vouchers throughout Los Angeles County. Of those, approximately 711 or 0.7 percent of all vouchers in Los Angeles County were utilized by low-income Hawthorne residents. LACDA monitors all units to ensure they are in adequate condition, meeting the Section 8 Housing Quality Standards.

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

The Hawthorne Housing Authority and LACDA support resident councils and actively seeks input from Public Housing Authority (PHA) residents concerning the management and implementation. Housing prices in Los Angeles County are so high that homeownership opportunities are limited for residents. LACDA continues to actively promote programs such as the First-Time Homebuyer Assistance programs and actively encourage public housing residents to explore homeownership opportunities.

Both the City and LACDA encourage residents to be actively involved in the community and in the management of public housing developments through resident councils and numerous opportunities for feedback such as community meetings and surveys. LACDA and the City also actively encourage and promote public housing residents to participate in homebuyer counseling programs and recommends residents use the family self-sufficiency escrow account to save money towards homeownership. Under the Family Self-Sufficiency (FSS) program, participants develop a five-year training and service plan that outlines the steps to become employed, increase their earnings, and become independent of government assistance. Upon graduation of the FFS program, graduates are allowed to use the escrow account funds towards homeownership.

Actions taken to provide assistance to troubled PHAs

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

CR-35 - Other Actions 91.220(j)-(k); 91.320(i)-(j)

Actions taken to remove or ameliorate the negative effects of public policies that serve as barriers to affordable housing such as land use controls, tax policies affecting land, zoning ordinances, building codes, fees and charges, growth limitations, and policies affecting the return on residential investment. 91.220 (j); 91.320 (i)

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

Based on information gathered during community meetings, the Consolidated Plan Needs Assessment Survey, the 2021-2029 Housing Element, and market analysis, the primary barriers to affordable housing in Hawthorne continue to be housing affordability and the lack of monetary resources necessary to develop and sustain affordable housing. The two barriers are related in the sense that demand for affordable housing exceeds the supply and insufficient resources are available to increase the supply of affordable housing to meet demand.

To address these barriers, the City has adopted a policy to allow by-right approval of housing developments proposed on non-vacant sites included in the previous Housing Element inventory (5th Cycle) and on vacant sites included in the two previous Housing Element inventories (4th and 5th Cycles), provided that the proposed housing development includes at least 20 percent lower income affordable housing units.

The City is also exploring options to utilize their regulatory powers including density bonuses and financial incentives to promote and facilitate the development of affordable housing. In addition, the City anticipates conducting a review of residential development standards, regulations, ordinances, departmental processing procedures, and permit fees related to construction and rehabilitation to determine any constraints on housing development and modify accordingly.

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

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

To overcome these obstacles, the City continued to invest CDBG and HOME funds through the 2022-2023 Action Plan in projects that provided assistance to low- and moderate-income homeowners for home improvements, projects that provide public and neighborhood services to low- and moderate-income people and projects that prevent homelessness.

To address underserved needs, the City allocated 100 percent of its non-administrative CDBG and HOME investments for Program Year 2022-2023 to projects and activities that benefit low- and moderate-income people.

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

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

The Residential Lead-Based Paint Hazard Reduction Act of 1992 (Title X) emphasizes prevention of childhood lead poisoning through housing-based approaches. To reduce lead-based paint hazards, the rehabilitation of housing units built prior to January 1, 1978 included a lead-based paint testing and risk assessment process. When lead-based paint was identified, the City ensured that developers and contractors incorporated safe work practices and depending on the level of assistance, abate the lead-based paint as part of the scope of work to effectively reduce lead-based paint hazards to children in accordance with federal regulations. There were no instances of lead-based paint identified during the rehabilitation of housing units under the Housing Rehabilitation program during the 2022-2023 program year.

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

During the Program Year, the City supported the following strategies and actions to reduce the number of poverty-level families:

- Supported housing preservation programs that ensure low- and moderate-income households have a safe, decent, and appropriate place to live;
- Supported public services through various non-profits funded by CDBG that serve the community's youth, families, and residents with special needs
- Supported a continuum of housing and public service program to prevent and eliminate homelessness

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

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

The institutional delivery system in Hawthorne is best represented through the collaboration between local government and an outstanding set of non-profit organizations that carry out a diverse array of public service programs to enrich the lives of residents. These relationships are collaborative-each organization partnering with the next to ensure that all Hawthorne residents have the support necessary to lead fulfilling lives.

Affordable housing preservation activities are carried out by the Housing Department in partnership with the housing contractors. Guided by the Strategic Plan, public service activities are carried out by non-profit organizations and City Departments to serve low- and moderate-income residents. The Housing Department works with the Public Works Department on city-owned public facilities and infrastructure improvements to ensure their projects are delivered on time, within budget, and in compliance with all federal, state, and local regulations.

Through technical assistance and the annual Notice of Funding Availability process last winter, the City continued to develop and expand local institutional structure by strengthening existing partnerships and leveraging the experience of organizations that previously have not participated in locally-administered federal programs to expand the number of program offerings available to residents.

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

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

Representatives of the City participated in regularly scheduled regional Homeless Coalition meetings by the lead agency of the Continuum of Care, LAHSA. Additionally, City staff partook in neighborhood meetings during the program year to coordinate the efforts of local organizations that are working in neighborhoods to address poverty through direct community engagement.

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

Activities implemented during the 2022-2023 Program Year followed the recommendations of the Analysis of Impediments to Fair Housing Choice that was adopted by the City Council on May 12, 2020. For the 2020-2024 planning period, there is one (1) impediment to fair housing choice summarized below.

Discrimination Against Persons with Disabilities: According to data provided by the local Fair Housing service provider, the number of fair housing discrimination complaints on the basis of disability accounted for 82 percent of all complaints by Hawthorne residents. Throughout the region, the state, and nationally, disability-related complaints are the leading basis of discrimination cited by residents, accounting for approximately two-thirds of all complaints in some jurisdictions, demonstrating a lack of understanding and sensitivity of the fair housing rights of persons with disabilities who experience difficulties when requesting reasonable

accommodations or modifications. In particular, persons with cognitive disabilities experience significantly more problems with these accommodations.

The Analysis of Impediments to Fair Housing Choice included the following recommendation specific to the City of Hawthorne:

- Work with the City's fair housing services provider, continue to invest in landlord and tenant counseling and mediation services, facilitate educational opportunities for landlords and tenants to provide information concerning the law as it pertains to reasonable accommodations and modifications.
 - For the 2022-2023 Program Year, the City contracted with the Fair Housing Foundation (FHF) to provide fair housing education and general housing services to Hawthorne residents to prevent incidences of housing discrimination. Implementation of the 2020-2024 Fair Housing Plan recommendations during the Program Year was principally undertaken by FHF, with the participation of the City of Hawthorne Housing Department.
 - During the program year, FHF assisted 232 Hawthorne residents with general fair housing education services throughout Hawthorne. Outreach included two informational booths at community events; four fair housing presentations to community-based organizations, resident associations, and government agencies, and two walk-in clinics tailored to specific audiences. Topics included federal and state fair housing laws, including protected classes, prohibited practices, and disability accommodations.

CR-40 - Monitoring 91.220 and 91.230

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

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

Technical Assistance

To enhance compliance with federal program regulations, the City made technical assistance available to prospective applicants to review the Consolidated Plan goals, program requirements, and available resources with potential applicants. Subsequent to the approval of the Annual Action Plan, a mandatory subrecipient workshop was held in June 2022 to review program regulations in detail, to provide useful forms and resources for documenting compliance, and to review the City's compliance procedures and requirements. Additionally, individualized technical assistance was provided on an as-needed basis during the Program Year.

Activity Monitoring

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

Subrecipients were required to submit an audit and other documentation to establish their capacity, and any findings noted in the audit are reviewed with the applicant. Eligible applicants were then considered for funding. The City reviewed quarterly performance reports and invoices throughout the year as part of its desk monitoring.

For CDBG public service activities, remote monitoring was conducted during the program year to verify compliance. These reviews included both a fiscal and programmatic review of the subrecipient's activities. The reviews determined if each subrecipient complied with the program regulations and City contract. Areas of review included overall administration, financial systems, appropriateness of program expenditures, program delivery, client eligibility determination and documentation, reporting systems, and achievement toward achieving contractual goals. Following the remote monitoring visit, a written report was prepared, delineating the result of the review and any findings of non-compliance and the required corrective action. Subrecipients were given 30 days to provide the City with corrective actions taken to address any noted

findings. For CDBG capital projects, monitoring also included compliance with labor standards and regulatory agreement requirements.

For HOME funded activities, the annual monitoring is scheduled to occur in October of 2023 and will be performed on renter occupied units to ensure that household income, rents, and utility allowances were in compliance with applicable limits pursuant to the affordability covenant.

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

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

In accordance with the City's adopted Citizen Participation Plan, a public notice was published in the *Hawthorne Press Tribune* on August 24, 2023, notifying the public of the availability of the Consolidated Annual Performance and Evaluation Report (CAPER) for a 15-day public review and comment period. A copy of the public notice is included in Appendix A.

The draft CAPER was available from August 25, 2023, to September 12, 2023 on the City's website. Physical copies were also available at City Hall and the public library. Residents were encouraged to review the CAPER and provide any written comments by mail to Kimberly Mack, Housing Director, or via email to kmack@cityofhawthorne.org. A summary of any written comments received during the public review and comment period are included in the CAPER submission to HUD as Appendix A.

A public hearing was conducted before the City Council on Tuesday, September 12, 2023 to solicit comments from residents and interested parties. A summary of any written or oral comments received during the public hearing are included in Appendix A of the final approved CAPER.

CR-45 - CDBG 91.520(c)

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

The 2022-2023 Program Year was the third year of the 2020-2024 Consolidated Plan. The City made progress towards its five-year and one-year goals for this reporting period and did not change its program objectives or the projects and activities that utilized CDBG funds. The 2022-2023 projects were successful, and therefore, no changes are anticipated to be made for the City's future objectives.

CDBG funded activities contributed significantly to the City's progress toward meeting the high priority needs identified in the Consolidated Plan. As shown in Table 1 on page 2 of this document, CDBG funds are contributing to four Strategic Plan goals including Fair Housing Services, Public Services, Affordable Housing Preservation, as well as Public Facilities and Infrastructure Improvements.

CR-50 - HOME 91.520(d)

Include the results of on-site inspections of affordable rental housing assisted under the program to determine compliance with housing codes and other applicable regulations

Maintaining HOME-assisted affordable housing is a high priority. During the Program Year, and as a result of the COVID-19 pandemic, the Housing Department did not conduct physical inspections of any HOME-assisted properties currently in their affordability period as required to determine compliance with the housing codes and other applicable regulations. Inspections will resume on their regular schedule during the 2023-2024 Program Year. When any deficiencies exist, the property owner and property management will be notified to make repairs and Housing Department staff will follow up to ensure completion of the required repairs. The following HOME-assisted projects are subject to on-site inspection:

- 12501 Kornblum Avenue – 3 units

Provide an assessment of the jurisdiction's affirmative marketing actions for HOME units. 92.351(b)

Each of the HOME-assisted properties with more than five units maintains an Affirmative Fair Housing Marketing Plan. During annual monitoring, the annual Affirmative Fair Housing Marketing Report and waitlist are reviewed to ensure compliance with HUD requirements to affirmatively further fair housing choice.

Refer to IDIS reports to describe the amount and use of program income for projects, including the number of projects and owner and tenant characteristics

A total of \$0.00 of HOME program income was receipted during the Program Year. A balance of \$490,493.12 of program income was on hand at the end of the reporting period. This program income will be applied to upcoming HOME funded activities in the next FY.

Describe other actions taken to foster and maintain affordable housing. 91.220(k)

In the implementation of the 2022-2023 Action Plan, the City utilized HOME funds to preserve and maintain affordable housing by rehabilitating the existing housing stock of the City through its Housing Rehabilitation program. In addition, the City continued the process of updating its Housing Element to ensure it is prepared to meet the future housing needs of Hawthorne for the 2021-2029 planning period. A revised final draft was made available for public review during the month of August 2022. This policy document will identify goals, policies, and programs that the City will use to direct and guide actions related to housing.



APPENDIX A

Citizen Participation



APPENDIX B

Grantee Unique Appendices