



2021-2022

CDBG Consolidated Annual Performance and Evaluation Report

September 2022

Community Development Department
Neighborhood Services Division

Table of Contents

CR-05 - Goals and Outcomes	2
CR-10 - Racial and Ethnic Composition of Families Assisted	13
CR-15 - Resources and Investments 91.520(a)	15
CR-20 - Affordable Housing 91.520(b)	17
CR-25 - Homeless and Other Special Needs 91.220(d, e); 91.320(d, e); 91.520(c)	20
CR-30 - Public Housing 91.220(h); 91.320(j)	24
CR-35 - Other Actions 91.220(j)-(k); 91.320(i)-(j).....	25
CR-40 - Monitoring 91.220 and 91.230.....	30
CR-45 - CDBG 91.520(c)	33

CR-05 - Goals and Outcomes

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

The 2021-22 program year constitutes the City of Lodi's third year implementing the 2019-23 Community Development Block Grant (CDBG) Consolidated Plan, as amended on December 22, 2020. During this program year, CDBG-funded projects and programs were executed within the City with the intention of achieving the goals outlined in the Strategic Plan section of the Consolidated Plan and addressing the impacts of the COVID-19 pandemic. These projects and programs were carried out by City staff, contractors, and subrecipients of CDBG funds.

This year's activities resulted in addressing nine of the eleven goals outlined in the Strategic Plan section of the 2019-23 Consolidated Plan, as follows:

- Goal #1: Promote Safer Neighborhoods
- Goal #3: Infrastructure and Facility Improvements
- Goal #4: Increase and Maintain Supply of Affordable Housing
- Goal #6: Support Public Service Programs for Priority Populations
- Goal #7: Affirmatively Further Fair Housing
- Goal #10: Create and Promote Housing for Homeless Populations
- Goal #11: COVID-19 Preparation, Prevention, and Response

While the City's efforts during the 2021-22 program year did not target Goal #2, Goal #5, Goal #8, or Goal #9, the City intends to address these goals in future program years during the 2019-23 Consolidated Plan program period.

The following summarizes the City's 2021-22 CDBG-funded activities and how they aligned with the priority needs and goals in the 2019-23 Consolidated Plan.

Priority Need – Safer Neighborhoods and More Resident Pride

Graffiti Abatement

The **City of Lodi's** Graffiti Abatement program has helped reduce blight by cleaning up tagged properties in the low- and moderate-income CDBG target areas. Within the last four program years, over 99 percent of abatements were completed the same day they were reported, which benefits not only the property but prevents secondary tags. The program runs year-round and has helped preserve neighborhood property values and maintain housing

stock in the City. The Graffiti Abatement program removed 1,536 instances of graffiti in the CDBG target area throughout the program year, benefitting the approximately 20,000 individuals living in the CDBG target area.

Priority Need – Improvements to Infrastructure and Facilities Access

Steam Table Replacement

The Salvation Army serves persons experiencing homelessness through the Hope Harbor Shelter and Lodi Corps Facility, the latter which stores food donations. CDBG funds were utilized for replacement of the Hope Harbor Shelter steam table, used for serving meals at the shelter 365 days a year. The steam table ensures the shelter can keep food safety temperatures at appropriate health department levels. The facility's current unit has been running every day, year round, for more than 13 years and is in need of replacement.

Refrigerator and Freezer Replacement

Lodi House purchased a commercial refrigerator and freezer to support the facility's five-day-a-week structured nutrition program.

Alley Improvements Project

The **City of Lodi's** Alley Improvements Project has continued despite delays from the COVID-19 pandemic. Construction has begun on Central Avenue, between Walnut Street and Oak Street to lay a 12" diameter storm drain line.

Priority Need – Services for Priority Populations

Meals on Wheels

The **LOEL Senior Center** served 128 seniors, thus exceeding its initial goal of 100 unduplicated seniors; all 128 recipients reported having a disability. This meal program provides a hot nutritious meal five days a week to homebound seniors. As the meals are brought to each door, the recipient receives daily nutrition, socialization, and a welfare checkup to make sure they are not in need of some urgent or serious assistance. In some instances, in 2020, the meal delivery person aided the senior in a medical emergency.

Food Assistance Program

The **Second Harvest Food Bank** served a total of 2,456 unduplicated individuals and their family members, falling short of its goal of 3,500 persons. Additionally, many families visited the food bank and its nonprofit partners repeatedly throughout the year. About 99 percent of participants in the program were identified as "extremely low income," indicating an annual income of less than 30 percent of area median income (AMI). This food

distribution is accomplished through a three-part program, which provides 1) food to low-income families; 2) groceries to youth who participate in the Boys and Girls Club; and 3) supplemental groceries for seniors at the LOEL Senior Center.

Priority Need – Services for Children/Youth

Family Resource Center and Youth Program

The **Community Partnership for Families of San Joaquin** (CPFSJ) provided services through the Family Resource Center and Youth Program. These services were aimed at addressing youth financial self-sufficiency, employment, gang involvement, academic struggles, mental health issues, substance abuse issues, and more. During the program year, the organization exceeded the number of projected individuals (176) served by providing 310 unduplicated individuals with intake assessments and mentoring activities and events. CPFSJ was able to exceed its goal by 80 percent due to its partnership and colocation with Lodi Adopt-A-Family, which allowed CPFSJ to assess and offer services to many more families.

Priority Need – Improvements to Housing Conditions

Residential Repair Program

The **City of Lodi** provided grants to seven single-family homeowners who needed financial assistance to make minor interior and exterior repairs. Contractors have been selected and repairs are scheduled to be completed within the calendar year. Repairs will include exterior paint, window replacement, concrete pathway replacement, installation of smoke alarms and carbon monoxide detectors, HVAC replacement, termite remediation, and lead abatement. The City intended to assist 10 households; however, six of the participating homes required significant lead abatement, which increased costs and resulted in only seven homes being assisted.

Priority Need – Support Fair Housing Services

Fair Housing Services

Fair housing is the right to choose housing free from unlawful discrimination. **SJFH** provided fair housing assistance, including education, counseling, and mediation services, to the residents of San Joaquin County. SJFH assisted 1,197 Lodi residents in the program year. The program goals are to assist in the event of potential fair housing violations, and to teach and advocate tenant and landlord rights and responsibilities regarding providing and maintaining adequate and safe housing. SJFH helped mediate conflicts between tenants and landlords and provided educational opportunities, including outreach at an LIC meeting. By educating both tenants and landlords, the program worked to mitigate housing discrimination in Lodi and to promote fair housing choice regardless of a person’s disability, religion, race/ethnicity, color, country of origin or ancestry, age, sex, gender identification/expression, familial

status, source of income, marital status, or sexual orientation. SJFH was able to exceed its goal due to the increased demand for services caused by the COVID-19 pandemic and with the additional assistance of CDBG-CV funding.

Priority Need – COVID-19 Preparation, Prevention, and Response

Small Business Assistance (Urgent Need)

The **City of Lodi** provided 18 small businesses with emergency grant funding to assist with business losses they incurred due to COVID-19 public health order shutdowns. These funds were used to pay commercial rent or mortgage, utilities, and for supplies to prevent the spread of COVID-19. In total, approximately \$155,000 was distributed to businesses in need of assistance.

Small Business Assistance (LMI)

The **City of Lodi** provided six small businesses that serve low- and moderate-income (LMI) households in Lodi with emergency grant funding to assist with business losses incurred as a result of the COVID-19 public health order shutdowns. These funds were used to pay commercial rent or mortgage, utilities, and for supplies to prevent the spread of COVID-19. In total, approximately \$55,000 was distributed to businesses in need of assistance.

Rental Assistance

The **Central Valley Low Income Housing Corp. (CVLIHC)** provided rental assistance to nine persons from January 1, 2021, to June 30, 2021, who were unable to pay all or part of their monthly rent. This was only 12 percent of CVLIHC's goal of providing rental assistance to 100 persons. CVLIHC noted that it has not received many qualifying applications for the program and as such has not been able to serve the projected number of people. This activity has been extended to September 30, 2021, and CVLIHC and the City of Lodi are working to make the program known to Lodi residents in need of assistance.

The Salvation Army provided rental assistance from January 1, 2021, to June 30, 2021, to 149 persons who were unable to pay all or part of their monthly rent. This is 248 percent of its goal of serving 60 persons. This program has also been extended to September 30, 2021, to allow for the continued expenditure of rental assistance funds. This program performed better than CVLIHC's program, due to the established presence of The Salvation Army in the City of Lodi. The Salvation Army exceeded its goal due to establishing a conservative estimate of the number of people it could serve at the beginning of the program year. There are many variables in the rental assistance process that may change the number of people ultimately served, including household size, monthly rental price, and the number of months that households are assisted.

Food Insecurity

To address the increased number of households needing food during the COVID-19 pandemic, **The Salvation Army** utilized CDBG-CV dollars to fund the delivery costs of their weekly food box program. Ultimately, The Salvation Army provided 10,553 food boxes to 1,068 Lodi residents from January 1, 2021, to June 30, 2021. The program exceeded its goals and CDBG-CV funds allowed the program to meet the increased needs of the community.

Overnight Shelter

The Salvation Army utilized \$5,250 in CDBG-CV grant funds to offset the cost of lost Emergency Food and Shelter Program (EFSP) grant funding due to the temporary closure of its overnight shelter beds and public meal service. On January 7, 2021, The Salvation Army was forced to suspend overnight shelter beds for 18 individuals and cease public meal service to approximately 100 clients for a period of two weeks due to five key staff members from the shelter needing to be quarantined due to COVID-19 concerns. The inability to provide 252 bed nights (18 clients x 14 nights) and 1,400 hot meals (100 clients average per night/100 meals per night x 14 nights) caused the shelter to be ineligible for \$5,250 worth of EFSP grant per diem funds that are applied to the overall shelter budget. These CDBG-CV funds were used toward the current operational expenses to continue to serve overnight clients and public dinners. Through this assistance, The Salvation Army was able to exceed its goal (60) and served 263 individuals with food and/or emergency shelter assistance.

Fair Housing Services

Through the CDBG-CV grant, **SJFH** was able to hire additional staff to provide program assistance. Due to increased demand for services caused by the COVID-19 pandemic, SJFH was able to hire a part-time receptionist to provide clerical and call support to the Housing Counselor staff. The Housing Counselors have seen an increase in calls and inquiries, particularly with tenants inquiring about their rights and responsibilities during the COVID-19 pandemic. SJFH was able to serve 320 Lodi residents between January 1 and June 30, 2021. Having the additional office assistance helped staff members deal with the increase in intakes.

Homeless Youth Outreach

The **Women's Center – Youth and Family Services (WCYFS)** provided street outreach, gateway services, and emergency shelter to youth experiencing homelessness. WCYFS used the funding to connect vulnerable youth in the community to resources in the community. While these services are always vital, the COVID-19 pandemic exacerbated the need for safe and secure housing, due to public health concerns that come with housing instability. WCYFS focused on providing basic needs to the youth experiencing homelessness, which included housing, personal hygiene, and personal protective equipment

(PPE). Staff members were able to reach 21 out of the projected goal of 25 youth. Although slightly lower than anticipated, WCYFS still deems this program a success, considering the limitations on the kind of physical outreach they could conduct during the COVID-19 pandemic.

During every outreach event, the outreach team provided bagged lunches, hygiene packs, first aid kits, PPE, sunscreen, fanny packs, and/or self-care kits. The outreach team discussed agency services and other community resources with youth as well as connecting them to service providers as appropriate. Some outreach locations included, but were not limited to, Turner Road, Victor Road, The Salvation Army, and other areas in Lodi.

Distance Learning Center

The **Lodi Boys and Girls Club** Distance Learning Center exceeded its goal of assisting an additional 48 youth and was able to provide 207 youth with new access to its services. Those who participated in the program were able to access computers and the internet while being supervised and assisted by staff. The Distance Learning Center provided access to virtual learning in a safe, supervised environment, which was particularly beneficial to those households with working adults at home who could not take time off work or were unable to work from home. The grant of \$27,000 allowed the Lodi Boys and Girls Club to respond to the increase in need from COVID-19. Through the CDBG-CV funds, the Lodi Boys and Girls Club was able to purchase 6 new Chromebooks and add two additional full-time staff members to assist the youth who come to the center.

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)

Project/Activity	Agency/Operator	Strategic Plan Goal	Funding	Indicator	Unit of Measure	2022 Goal	2022 Actual	% Comp.
Planning and Administration	City Staff and Contractors	All	\$115,783	N/A	N/A	NA	NA	N/A
Promote Safer Neighborhoods						20,000	0	0
Graffiti Abatement	City Staff and Contractors	Promote Safer Neighborhoods	\$30,000	Public facility or infrastructure activities other than Low/Moderate Income Housing Benefit	Persons Assisted	20,000	0	0
Increase and Maintain Supply of Affordable Housing						10	7	70%
Residential Repair Program	City Staff and Contractors	Increase and Maintain Supply of Affordable Housing	\$135,000	Homeowner housing rehabilitated	Households Assisted	10	7	70%
Infrastructure and Facility Improvements						41,450	27,492	66%

Project/ Activity	Agency/ Operator	Strategic Plan Goal	Funding	Indicator	Unit of Measure	2022 Goal	2022 Actual	% Comp.
Alley Improvements Project	City Staff and Contractors	Infrastructure and Facility Improvements	\$413,147	Public facility or infrastructure activities other than Low/Moderate Income Housing Benefit	Persons Assisted	7,450	0	0%
Steam Table	The Salvation Army	Infrastructure and Facility Improvements	\$5,436	Hot Meals Provided	Persons Assisted	34,000	27,492	81%
Support Public Service Programs for Priority Populations						3,776	2,893	77%
Meals on Wheels	LOEL Senior Center	Support Public Service Programs for Priority Populations	\$10,000	Public Services other than Low/Mod Housing Benefit	Persons Assisted	100	120	120%
Second Harvest Food Bank	Second Harvest	Support Public Service Programs for Priority Populations	\$10,000	Public Services other than Low/Mod Housing Benefit	Persons Assisted	3,500	2456	72%
Family Resource Center & Youth Programs	Community Partnership for Families	Support Public Service Programs for Priority Populations	\$25,000	Public Services other than Low/Mod Housing Benefit	Persons Assisted	176	317	180%
Affirmatively Further Fair Housing						843	1,197	142%
San Joaquin Fair Housing (SJFH)	San Joaquin Fair Housing (SJFH)	Affirmatively Furthering Fair Housing	\$18,000	Public service activities for Low/Moderate Income Housing Benefit	Persons Assisted	843	1,197	142%
COVID-19 Preparation, Prevention, and Response						1,469	2,069	71%
Planning and Administration - CV	City Staff and Contractors	COVID-19 Preparation, Prevention, and Response	\$159,282	N/A	N/A	NA	NA	N/A
Small Business Assistance – Urgent Need	City Staff and Contractors	COVID-19 Preparation, Prevention, and Response	\$191,138	Businesses Assisted	Businesses Assisted	15	18	120%

Project/ Activity	Agency/ Operator	Strategic Plan Goal	Funding	Indicator	Unit of Measure	2022 Goal	2022 Actual	% Comp.
Small Business Assistance – LMI Benefit	City Staff and Contractors	COVID-19 Preparation, Prevention, and Response	\$75,000	Businesses Assisted	Businesses Assisted	6	6	100%
Rental Assistance	The Salvation Army	COVID-19 Preparation, Prevention, and Response	\$165,000	Homelessness Prevention	Persons Assisted	60	263	438%
Rental Assistance	Central Valley Low Income Housing Corp.	COVID-19 Preparation, Prevention, and Response	\$128,812	Homelessness Prevention	Persons Assisted	100	12	12%
Food Insecurity	The Salvation Army	COVID-19 Preparation, Prevention, and Response	\$16,500	Public Services other than Low/Mod Housing Benefit	Persons Assisted	600	1,068	178%
Overnight Shelter	The Salvation Army	COVID-19 Preparation, Prevention, and Response	\$5,250	Homeless Person Overnight Shelter	Persons Assisted	115	154	134%
Fair Housing Services	San Joaquin Fair Housing	COVID-19 Preparation, Prevention, and Response	\$8,200	Public Services other than Low/Mod Housing Benefit	Persons Assisted	500	320	64%
Homeless Youth and Outreach	Women’s Center	COVID-19 Preparation, Prevention, and Response	\$8,000	Public Services other than Low/Mod Housing Benefit	Persons Assisted	25	21	84%
Distance Learning Center	Lodi Boys & Girls Club	COVID-19 Preparation, Prevention, and Response	\$27,000	Public Services other than Low/Mod Housing Benefit	Persons Assisted	48	207	431%

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 2019-23 Consolidated Plan identifies twelve priorities and eleven main goals that align with these priorities. As discussed above, this year’s program activities resulted in meeting nine of the eleven main goals, which work to support the priority needs identified. To demonstrate, a list of each goal and the activity that supported each goal is outlined below:

- Goal #1: Promote Safer Neighborhoods
- Goal #3: Infrastructure and Facility Improvements
- Goal #4: Increase and Maintain Supply of Affordable Housing
- Goal #6: Support Public Service Programs for Priority Populations
- Goal #7: Affirmatively Further Fair Housing
- Goal #10: Create and Promote Housing for Homeless Populations
- Goal #11: COVID-19 Preparation, Prevention, and Response

Goal #1: Promote Safer Neighborhoods

- Lodi’s Graffiti Abatement program cleaned up graffiti throughout the City, particularly focusing on areas within the CDBG target area, and helped to prevent future occurrences of vandalism. This year’s program met its goal by removing graffiti throughout the City that promoted gang activity, profanity, desecration of public and private facilities, and language that promoted racism and intolerance toward different groups of people.

Goal #3: Infrastructure and Facility Improvements

- The Salvation Army Steam Table project supported The Salvation Army’s ability to serve persons experiencing homelessness and persons at risk of becoming homeless. The Lodi Corps Facility provides meals to approximately 4,701 individuals annually. CDBG funds were utilized for replacement of the Hope Harbor Shelter steam table, used for serving meals at the shelter 365 days a year. The steam table ensures the shelter can keep food safety temperatures at appropriate health department levels. The facility’s previous unit had been running every day, year round, for more than 13 years and needed replacing.

Goal #4: Increase and Maintain Supply of Affordable Housing

- The City of Lodi is providing financial assistance through a grant to homeowners that need to make minor interior and exterior repairs but are unable to afford them. The Residential Repair program keeps families in their homes through safety improvements.

Goal #6: Support Public Service Programs for Priority Populations

- The LOEL Senior Center Meals on Wheels program exceeded its goal of providing 100 seniors with health-food classes and healthy food alternatives by serving a total of 128 individuals. Senior populations were in particularly high need during the pandemic due to increased isolation

imposed by the public health order shutdowns; therefore, the increase in the number served is welcomed by the City.

- The Second Harvest Food Bank provides residents with access to food resources and often partners with nonprofits to supplement its services with additional nutrition education and food. It exceeded its goal by increasing the number of Lodi agencies served and increasing the amount of food provided to each agency.
- CPFSJ Lodi Family Resource Center and Youth Program's youth workshops are offered with an open invitation for youth to bring friends, which resulted in a much larger number of youth than anticipated, without increasing many program costs. These programs screen for and identify different needs for youth participants, along with the needs of that individual's family. The individual and their family are then connected with additional services; this prioritizes an approach that focuses on the family's role in the success of the youth's development. Youth participants are encouraged to develop a plan to take ownership of their family's circumstances and to develop their own plan as to how these circumstances could change. With their customized goals and the support of the agency staff, youth and family members work toward getting the assistance they need.

Goal #7: Affirmatively Further Fair Housing

- SJFH provided social services through fair housing mediation and counseling. SJFH also offers fair housing information on its website at <http://www.sjfairhousing.com/>.

Goal #10: Create and Promote Housing for Homeless Populations

- The City of Lodi is coordinating the acquisition and installation of four permanent supportive housing “tiny home” units for homeless individuals and/or families at 301 East Lodi Avenue. This adds four affordable housing units to the City’s existing stock. Site improvements and installation are scheduled to be completed within the calendar year.

Goal #11: COVID-19 Preparation, Prevention, and Response

- Businesses in Lodi were experiencing extreme losses due to California Executive Order N-33-20 and subsequent public health order shutdowns. The City’s Small Business Assistance program was able to assist 24 impacted businesses by paying up to six months of commercial rent or mortgage, utilities, supplies to prevent the spread COVID-19 among employees and customers, and costs associated with complying with public health orders.
- The Salvation Army provided emergency rental assistance to 263 persons who were unable to make their monthly rent payments as a consequence of COVID-19. This allowed households to stay in their home to observe social distancing protocol during the stay-at-home order. CVLIHC provided emergency rental assistance to nine persons who were also unable to pay rent due to COVID-19.
- The Salvation Army Overnight Shelter program provided 154 individuals with services. Individuals were able to receive emergency overnight housing via the Hope Harbor Shelter. Hot meals were also provided via Hope Harbor Shelter. The Hope Harbor Shelter was able to sustain operations despite COVID-19 spacing and occupancy precautions.
- The Salvation Army Food Insecurity program served 1,068 individuals. The program provided weekly food boxes to families. Throughout the two quarters of operation of the program, 10,553 boxes were provided to Lodi residents.
- The Lodi Boys and Girls Club Distance Learning Center program exceeded its goal of assisting an additional 48 youth and was able to provide 207 youth with new access to their services. Those who participated in the program were able to access computers and the internet while being supervised and assisted by staff. The Distance Learning Center provided access to virtual learning in a safe, supervised environment, which was particularly beneficial to those households with working adults at home who could not take time off work or were unable to work from home.
- WCYFS provided street outreach, gateway services, and emergency shelter to youth experiencing homelessness. WCYFS used the funding to connect vulnerable youth in the community to resources in the community. While these services are always vital, the COVID-19 pandemic exacerbated the need for safe and secure housing, due to public health concerns that come with housing instability. WCYFS focused on providing basic needs to the youth experiencing homelessness, which included housing, personal hygiene, and safety concerns.

CR-10 - Racial and Ethnic Composition of Families Assisted

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

91.520(a)

	CDBG
White	4,697
Black or African American	236
Asian	175
American Indian or American Native	61
Native Hawaiian or Other Pacific Islander	21
American Indian or American Native and White	4
Asian and White	7
Black or African American and White	5
Other Multi-Racial	3,220
Total	8,426
Hispanic	2,350

Table 1 – Table of assistance to racial and ethnic populations by source of funds

Narrative

Lodi's CDBG-funded activities serve residents of many races and ethnicities within Lodi. The table below compares the percentage served under Lodi's 2021-22 CDBG public service programs versus the total City population according to the 2019 5-year American Community Survey (ACS). Projects that benefit a public area are not required to collect specific race/ethnicity data and are not included here in the table. CDBG funds potentially underserved White, Asian, Native Hawaiian/Pacific Islander, Hispanic, and persons identifying as more than one race. Of this group, persons of more than one race were the most underserved, as only 0.2 percent of those served were Hispanic (18 percent for CDBG-CV funded programs), compared to making up 17.2 percent of the City's population. The City will work with its subrecipients to identify potential cultural, language, or other barriers to access for Hispanic residents. Black or African American and persons identifying as another race were potentially overrepresented. The City of Lodi continually aims to equitably serve its residents and will continue to work with subrecipients to reach underserved populations.

Race/Ethnicity	2021 CDBG % of total served	2019 ACS % of Total Lodi Population
White	55.7%	62.1%
Black or African American	2.8%	1.8%
Asian	2.1%	9.7%
American Indian or American Native	0.7%	0.5%
Native Hawaiian or Other Pacific Islander	0.2%	0.4%
More than One Race	0.2%	17.2%
Other	38.2%	8.4%
Total	100%	10%
Hispanic	27.9%	37.8%

CR-15 - Resources and Investments 91.520(a)

Identify the resources made available

Source of Funds	2021-2022 Funds	Resources Made Available	Amount Expended During Program Year
CDBG	\$668,918	\$668,918	\$326,452.31
CDBG-CV	\$796,408	\$796,408	\$579,922.14

Table 2 – Resources Made Available

Narrative

During the 2021-22 program year, \$326,452.31 in CDBG funds was expended across all projects. For the CDBG-CV program, approximately \$579,922.14 has been expended as of June 30, 2022.

Please refer to the appendix for a detailed financial summary report for the 2021-22 CDBG program year.

Identify the geographic distribution and location of investments

Target Area	Planned Percentage of Allocation	Actual Percentage of Allocation	Narrative Description
CDBG Target Area	60%	81%	81 percent of CDBG funding was allocated to activities in the CDBG target area, including the Graffiti Abatement program and the Alley Improvements project.
Citywide Activity	40%	19%	19 percent of CDBG funding was allocated to citywide activities, including the social services projects.

Table 3 – Identify the geographic distribution and location of investments

Narrative

While Lodi has used a needs-based strategy to select projects and activities, the greatest need has historically been identified to be within the low-income CDBG target area. When possible, specific attention will be focused on one census tract (45.02) in the target area that was identified as a Racially/Ethnically Concentrated Area of Poverty (R/ECAP). During the 2021-22 program year, the Alley Improvements project was located in census tract 45.02 for Central Avenue, between Walnut Street and Oak Street to lay a 12” diameter storm drain line.

The social services projects serve at least 70 percent low- to moderate-income persons. Most social service organizations offer their services citywide. Due to Lodi’s concentrated low-moderate income area,

it is believed that the majority of recipients reside in the CDBG target area; however, for purposes of this calculation, the projects are considered citywide activities and are not included in the CDBG target area.

For CDBG-CV activities, all activities were citywide as they were available to all low- and moderate-income residents regardless of location.

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.

Federal funds require additional regulation, labor compliance standards, and administration that may not work efficiently to fund new capital improvement projects. For new construction and large-scale rehabilitation of affordable housing, the City is looking to pursue funding that is compatible with other grant resources to maximize the potential of a project and ensure financial feasibility. Therefore, the City focuses CDBG funding either on projects that are already required to comply with federal reporting requirements or on projects where there is no other viable funding source, and the project can be funded entirely with CDBG funding.

With respect to public service projects funded with CDBG funds, many of Lodi's social service subrecipients have additional resources to support their CDBG-funded programs. These additional resources include not only other grant funds, but in-kind volunteers and donations. To best leverage the City's available resources, the City will continue to look for opportunities to layer private and non-federal resources with federal resources and to require that CDBG subrecipients demonstrate sufficient committed non-CDBG funding, so that projects and services will have the best results for the community and the low- and very low-income residents they are intended to serve. Additionally, SJFH is primarily funded with CDBG funding from all of the other jurisdictions in San Joaquin County.

The construction project that used CDBG funds during the 2021-22 program year was the Alley Improvements project and being funded solely using 2021-22 CDBG funds and did not leverage funds from other sources.

Though the CDBG program does not have a matching requirement, the City of Lodi considers match funds as a factor in determining recommended actions while evaluating the subrecipient applications and project proposals submitted to the City for CDBG funding.

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	6	282
Number of special-needs households to be provided affordable housing units	4	0
Total	10	282

Table 4- Number of Households

	One-Year Goal	Actual
Number of households supported through rental assistance	0	275
Number of households supported through the production of new units	0	0
Number of households supported through the rehab of existing units	10	7
Number of households supported through the acquisition of existing units	0	0
Total	10	282

Table 5 - Number of Households Supported

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

During the 2021-22 program year, the City implemented the Residential Repair Program, which was initially funded in the 2016-17 program year. The City was able to begin the repair process for seven low-income households, which is expected to be complete by the end of the calendar year. The City was originally expecting to fund the repair of 10 homes but was unable to procure a sufficient number of applications from residents and/or residents who did apply were not qualified. Additionally, the cost of lead abatement and rising lumber prices have reduced the number of homes that can be repaired.

The CDBG-CV program has assisted 275 persons with its Rental Assistance program through CVLIHC and The Salvation Army. These programs have provided rental assistance for households at risk of homelessness.

Discuss how these outcomes will impact future annual action plans.

The City plans to address housing needs, but without significant additional resources, the City will continue to focus CDBG dollars where they will provide the most benefit for low- and moderate-income households through better access to economic opportunities, services, and public infrastructure.

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 Persons Served	CDBG Actual	% of Actual
Extremely Low-income	3,130	93%
Low-income	169	5%
Moderate	38	1.1%
Above Moderate-income	22	0.7%
Total	3,359	100%

Table 6 – Number of Persons Served by Income

Narrative Information

As per HUD requirements, Lodi tries to focus CDBG funding toward low- and moderate-income households and neighborhoods. A total of 3,359 persons were served by CDBG-funded public service and fair housing programs. Of those, 3,130 individuals, or 93 percent, were extremely low income, or earned less than 30 percent of the AMI for San Joaquin County; 169 individuals, or 5 percent, were low income or earned less than 50 percent of AMI; 38 individuals, or 1.1 percent, reported having a moderate income, meaning that they earned less than 80 percent of AMI; and 22 individuals, or 0.7 percent, were over the low/moderate-income level. The City used an area benefit to determine population demographics for the public infrastructure projects that were intended to benefit low-income neighborhoods. The Graffiti Abatement program served neighborhoods that were approximately 73 percent low/moderate-income, and the Alley Improvements project served neighborhoods with approximately 76 percent low/moderate-income individuals. The City is continually looking for new resources to construct new affordable, transitional, and/or permanent supportive housing units. Moreover, the City looks for alternative ways to support affordable housing, such as helping preserve existing affordable housing through rehabilitation projects and renter’s assistance programs and creating transitional housing units for individuals in emergency or transitional circumstances.

The City continued to fund fair housing programs in the 2021-22 program year through SJFH. These programs assist individuals facing housing discrimination and landlord disputes to find solutions to these issues in a comprehensive and professional manner. SJFH operates a renter’s helpline that provides counselors and legal advice for individuals who are potentially being unfairly discriminated against in terms of their housing choice.

Additionally, the City works with its homeless committee to find more strategies to address the needs of persons experiencing homelessness. The City created a Homeless Liaison Officer position in the local

police department in 2017. The officer conducts street outreach and connects individuals with resources and local social service providers. In collaboration with the Lodi Committee on Homelessness (LCOH) volunteers, the officer has reported success in helping individuals access resources and in some cases housing.

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 City created two new staff positions in 2020: Community Development Director and Neighborhood Services Manager. These new staff positions have given the City additional capacity to participate in the many homeless housing/services efforts across the City and as described below.

The City has continued to be a participant in the LCOH, which comprises City staff from a cross section of departments (including police), City Council members, San Joaquin County agencies, local residents, business owners, and representatives from local and regional social services organizations (including CDBG subrecipients), faith-based organizations, philanthropic organizations, health organizations, and housing agencies. Led by the resident volunteers and supported by the LIC, this task force has built consensus and support to explore several short- and long-range solutions to reduce homelessness and mitigate its effect on the community. This culminated in the creation of a Report on Homelessness in Lodi, which was presented to the Lodi City Council in September 2015. The City Council adopted that report and its long- and short-term strategies. On November 4, 2020, the City Council adopted the San Joaquin Community Response to Homelessness: 2020 San Joaquin Strategic Plan ("Strategic Plan"), a strategic plan developed by the CoC that provide a road map to address homelessness based on local needs and strategies. The City has remained actively involved in the monthly committee and subcommittee meetings and has consolidated the other homelessness outreach efforts into these meetings.

Lodi has previously been involved with the CoC in the planning and execution of the countywide point-in-time homeless count, which typically takes place in January every other year. However, due to the COVID-19 pandemic, the 2021 point-in-time (PIT) count was canceled and rescheduled to 2022. On January 26, 2022 the City of Lodi PIT count was completed and resulted in a 50% increase from 2019 for a total of 208 unsheltered in the Lodi Community. It was noted by the CoC the City of Lodi by far had the most accurate PIT count within San Joaquin County

The City values its relationships with homeless service providers and reaches out to those providers for input on needs. Many of these service providers also attend City Council meetings to provide feedback on the homeless population.

In 2017, a Homeless Liaison Officer position was created in the Lodi Police Department. The officer works directly with the local unsheltered homeless to offer assistance, connect them with available services, and find placement in shelters and more permanent housing.

The City supported the Board of Supervisors in its creation of a lead position at the County level during the 2018-19 program year. The County now has a program administrator for homeless services. This

position is directed to bring about new homeless and affordable housing resources to the county, increase coordination among local jurisdictions, and help coordinate the point-in-time counts for the County.

The LIC, a City board and commission with members appointed by the City Council, continues to serve as a forum for discussing, gathering information, and promoting actions regarding homeless issues, among other resident-driven topics in the City. Due to the COVID-19 pandemic, the committee was unable to participate in a homeless point-in-time count scheduled for January 2022 however, it was able to engage the community regarding the Harmony Homes project, assist in City advocacy and education on homeless issues and solutions, and provide support to the LCOH.

Addressing the emergency shelter and transitional housing needs of homeless persons

Residents of emergency shelters and transitional housing often need additional services, such as rehabilitation programs, case management, medical evaluations, and living environments that allow for stability in the time it takes to get permanent, supportive housing. Additionally, these facilities are often in need of repairs due to steady and intensive use. The City has been adamant in recognizing the need for both more transitional housing and for providing additional resources for the preexisting facilities, both of which have been voiced by service providers in prior years.

For the 2021-22 program year, the City funded capital improvements for The Salvation Army. A walk-in refrigerator was repaired at the Lodi Corps facility, which is used to store nutritious meals that are then distributed to individuals in need. Additionally, The Salvation Army Hope Harbor Shelter's steam table was replaced. These projects helped The Salvation Army's everyday provision of services and has helped provide a better quality of life to the individuals that request services.

The City Council adopted the Strategic Plan on November 4, 2020. The Strategic Plan includes goals and strategies developed from community feedback, which includes increasing access and reducing barriers to homeless crisis response services.

The City has made great strides toward meeting the goals identified in the Strategic Plan by securing multiple revenue sources to help establish an Access Center low-barrier emergency shelter in Lodi. The City Council accepted the Permanent Local Housing Allocation (PLHA) grant on April 7, 2021. The PLHA grant is a five-year allocation from the State of California to be used for the provision of permanent local housing. Funding for years two through five have been allocated toward the City's Access Center project, which will provide robust services and a low-barrier emergency shelter to persons experiencing homelessness. In addition to the PLHA, the City Council has allocated to the project \$5.5 million of American Rescue Plan Act funds and the San Joaquin County Board of Supervisors has allocated \$2.8 million of capital outlay funds.

The City also applied for numerous grant funds, most of which were available to address COVID-19 concerns for persons experiencing homelessness. In a previous program year, the City applied for and received HEAP funds for the development of four permanent supportive housing units, which are slated to be completed later this calendar year. The City also received Local Early Action Planning funds for predevelopment support of the City's Access Center Project and Regional Early Action Planning funds to support affordable housing feasibility studies. The City applied for and received SB 89 funds for temporary outdoor restrooms and hand-washing stations. On behalf of the LOEL Senior Center, the City applied for

and received CARES Acts funds for a senior meals-on-wheels program. Lastly, the City applied for and received Great Plates funds that pay for local restaurants to prepare meals for lower income families. The City applied for and did not receive Homeless Housing, Assistance, and Prevention Program (HHAP) round 1 funds and Emergency Solution Grant – COVID-19 (ESG-CV) funds.

The CDBG-CV program funded The Salvation Army's food and overnight shelter programs as well as the Women's Center Homeless Youth and Outreach program. The programs provide needed services to persons experiencing homelessness whose conditions have been exacerbated by the COVID-19 pandemic.

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 City uses several strategies to assist chronically homeless individuals. The following activities have occurred or are in process.

- With the use of CDBG funds, The Salvation Army Hope Harbor Shelter was able to replace its steam table and additional resources to individuals seeking overnight shelter
- The LCOH collaborates with the Homeless Liaison Officer, a position in the Lodi Police Department that connects persons experiencing homelessness, on an individual basis, with needed programs, resources, and shelter. One member of the committee sits on the Emergency Food and Shelter Board, and another sits on the CoC board. Additionally, the City's Neighborhood Services Manager sits on the CoC Strategic Planning Committee. Committee members frequently participate in CoC board activities to address homelessness (such as point-in-time counts).
- The City continued to support the Second Harvest Food Bank, which provides food to many local Lodi service providers that then distribute this food to persons experiencing homelessness and persons and families at risk of homelessness. Healthy food contributes to better health, which in turn can reduce associated medical costs and financial stress, which can be a factor in homelessness.
- Similarly, the City supports the LOEL Center and The Salvation Army, which provide food to extremely low- and very low-income residents across the City. Food provision can help some residents save funds to use on other necessities such as health and housing.

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

To assist families in avoiding homelessness, the City has supported the CPFSJ youth program, which promotes the mental, emotional, social, and educational well-being of Lodi's youth. This in turn helps them to make positive choices about their future, including efforts at schools and with career opportunities. Some youth come from families that have experienced multi-generational poverty, and this program contributes to ending that cycle through opportunities for educational mentoring, interpersonal communication, skill training, and mapping goals for the individual's future, including their family's future. The CPFSJ program takes a holistic look at family health as part of its programming and to help improve core factors facing at-risk youth in the City.

The City also supports the Second Harvest Food Bank, which helps families teetering on the edge of homelessness. Additionally, some of Lodi's seniors are on fixed incomes and face medical care expenses, often frequently. To assist these residents in meeting everyday living costs, the City assisted LOEL Senior Center with its Meals on Wheels Program. This program serves both hot and cold meals that are tailored to the nutritional and dietary needs of the elderly residents. Meals are delivered directly to seniors, who in turn receive a daily check-in to see if they have any additional needs.

The City continues to have a strong relationship with The Salvation Army Lodi Corps. Their programs in Lodi offer financial assistance for low-income families, food boxes, culinary arts training, job skills, and Hope Harbor Shelter, which provides overnight care for men, women, and families with children, transitional living, and a cold-weather shelter. The Salvation Army offers homeless services, support, and resources such as case management, hot meals offered 365 days a year, showers, clothing exchange, and "pre-program" supportive services to prepare individuals for one of their six-month rehabilitation programs.

The City supported basic human needs by providing funds to the Second Harvest Food Bank, which provides bulk food goods to local shelters. The City also continued to support the LOEL Senior Center, which provides food and nutrition for seniors who might otherwise not have the funds. Both programs provide food to extremely low- and very low-income residents across the City. Providing this food can help residents free up funds for other necessities, such as health and housing.

The CDBG-CV program also addressed the impacts of COVID-19 by funding two rental assistance programs. These included programs from The Salvation Army and CVLIHC, which helped families remain in housing and avoid becoming homeless.

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

Actions taken to address the needs of public housing

The Housing Authority of the County of San Joaquin (HACSJ) continued to be the public housing agency serving the City of Lodi. HACSJ is independent of the City of Lodi, and the City retains no control over its funding or implementation of programs.

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

HACSJ encouraged public housing residents to participate in policy, procedure, and program implementation and development through its Resident Advisory Board. HACSJ also distributed newsletters to all residents, which contains relevant news, information on training and employment opportunities, and other community resources available to public housing residents. Public housing residents also participate in the development of the HACSJ five-year and annual plans. The Resident Services Division distributes a survey to prioritize residents' needs and schedule short- and long-term improvements.

Actions taken to provide assistance to troubled PHAs

HACSJ is designated as a "High Performer."

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)

In the 2021-22 program year, the City funded SJFH to address the need for actions against affordable housing barriers. A detailed summary of actions taken to address barriers to affordable housing, as outlined by the Analysis of Impediments to Fair Housing Choice, can be found below in section 91.520(a).

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

In the 2021-22 CDBG program year, the City supported the following programs to address underserved needs:

- SJFH’s housing counseling services, outreach, and seminars.
- Second Harvest Food Bank’s services to disabled, elderly, youth, and persons experiencing homelessness and their families.
- CPFSJ’s services, which predominantly serves at-risk youth populations and their families that are at risk of gang influence and activities. Many of the partnership’s efforts help to serve Hispanic youth and their families.
- LOEL Senior Center’s Meals on Wheels Program for elderly, many of which are disabled and have little ability to have social interaction or access to nutrition on their own. .
- The Salvation Army and Central Valley Low Income Housing Corp. have been providing rental assistance to households at risk of eviction with CDBG-CV funds.

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

In 2021-22, the City offered the following programs to reduce lead-based paint hazards:

- The City will provide lead-based paint testing as a component of its residential repair and rehabilitation program when required by HUD regulations. Given the age and condition of Lodi’s housing stock, lead-based paint testing is needed in a significant number of homes.
- Lodi has lead-based paint hazards flyers and information at City Hall for those seeking more information or for those who might be affected.
- The City has begun repairs on seven homes through the Residential Repair Program. The project is required to abate any lead-based paint hazards on site.

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

The City strives to ensure the CDBG program serves as many poverty-level families as possible. In the 2021-22 program year the City used CDBG funds to fund projects to provide various social services to low-income families and youth. The City plans to continue to fund activities that closely relate to the 2019-23 Consolidated Plan's Strategic Plan goals, which are largely focused on reducing poverty and supporting low-income areas with various community development activities.

In the 2021-22 program year, the following nonprofits provided these instances of service to Lodi residents:

- Second Harvest Food Bank: Served 2,456 participants, 99 percent were low-income.
- LOEL Senior Center: Provided 128 homebound seniors nutritious meals five days a week. This program largely helps to assist disabled elderly, many of whom are in need of financial and medical assistance.
- CPFSJ: Provided 529 youth through their support and counseling program. The benefit from their program also goes on to benefit the household of the recipient.
- SJFH: Served 1,197 households with housing-related services; their program is a great resource for low-income families that are facing various rental housing issues.
- The Lodi Boys & Girls Club operated a distance learning center when schools were utilizing virtual learning to allow parents to continue working.

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

The City's CDBG-funded programs are administered by the City's Community Development Department, Neighborhood Services Division. This division works collaboratively with other departments/subdivisions, such as Planning, Code Enforcement, Economic Development, and Public Works. In addition, City staff is the liaison to the LIC and stays updated on LCOH, CoC Shelter Committee, CoC Strategic Planning Committee, and the County Emergency Food and Shelter Program Board. Participation in these committees helps the City's CDBG program stay current and aware of the most pressing community needs, as well as allowing networking and problem-solving with local and regional social service providers, some of which bring in additional resources to the City.

A significant gap in access to social services for Lodi residents is due to a lack of social services in the City. Many services are located outside of Lodi, usually in Stockton. The City's GrapeLine bus system connects to San Joaquin Regional Transit, which goes to Stockton. Residents, however, are often deterred by the cost, number of transfers, and length of trips. Since 2014, the City has encouraged and pursued opportunities for out-of-town service providers to have satellite facilities/offices in Lodi.

In 2015, the City updated its Housing Element, which discusses issues such as multi-family and affordable housing, reviewed existing HUD-funded housing programs, and evaluated their effectiveness.

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

The City continues to participate in regional coordination of services through the LCOH, LIC, and other networking opportunities.

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

SJFH remained open during the COVID-19 pandemic. SJFH was able to answer questions from tenants and landlords about housing issues impacted by COVID-19, including the moratorium on evictions and general questions about rights and responsibilities from both tenants and landlords. SJFH shared documents for tenants to give to landlords regarding a tenant's loss or reduced income due to the pandemic and advised landlords on how they could work with their tenants during this pandemic. SJFH implemented additional public information on its website, as well as an informational table outside of its office, which worked to provide community members with resources.

Overall, SJFH was able to mediate and counsel 1,197 families in Lodi during the 2021-22 fiscal year.

Additionally, the City took action as recommended from the completed and approved 2016 Analysis of Impediments. Actions taken during 2021-22 plan year to overcome the identified impediments are as follows:

1. Lack of sufficient subsidized and unsubsidized affordable housing supply, particularly for low-income special needs households:

- Action: The City accepted applications and executed agreements with seven households for the Residential Repair Program project during the 2020-21 program year. Repairs will be completed by the end of the calendar year.

2. Lack of available rental housing subsidy for lower-income households.

- Action: The City continues to support HACSJ in its administration of the Housing Choice Voucher rental assistance program, which may include distribution of program information at the Community Development public counter; distribution of program information to rental property owners as part of the City's code enforcement activities; consultations with representatives of HACSJ to discuss actions the City can take to encourage greater participation in the voucher program by rental property owners.
- The City has been in discussions with HACSJ regarding rehabilitation of an existing complex through support of HOME grant funds. The City has also been talking with various local and regional homeless shelter providers regarding the purchase of existing structures for conversion to affordable units for lower income households, especially households experiencing homelessness.

3. Different origination and denial rates based on neighborhood.

- Action: The City of Lodi has continued to track fair housing complaints and cases lodged in the City to ensure that lenders are not violating fair housing law with discriminatory lending practices.
- Action: During the program year, the City continued outreach to residents about their fair housing rights and how to seek assistance. This was largely done through the specified fair housing programs that are carried out by SJFH.
- Action: The City of Lodi continues to support home purchase programs targeted to low/moderate-income households, such as down payment assistance and homeownership mortgage counseling, as long as funding is available. The City may elect to pursue additional funding for down payment assistance at a future time if funding becomes available. The City has identified supporting first-time home buyers as a priority in upcoming CDBG program years.

4. Lack of information on the nature and basis of housing discrimination and the resources available to seek assistance.

- Action: The City of Lodi has continued to monitor the incidence of housing discrimination complaints and report trends annually in conjunction with the CAPER. Additionally, the City has updated formal policies and procedures for persons with disabilities to request reasonable accommodations to local planning and development standards. Information on the accommodations that a resident can request has been made available online and an ADA compliance officer has been identified as well. Information can be found here: <http://www.lodi.gov/665/Americans-with-Disabilities>.
- Action: The City of Lodi has continued to include a review of prior year performance regarding affirmatively furthering fair housing in the annual planning for the use of CDBG funds. The City will identify funding support that addresses the removal of impediments or advancing specific fair housing goals.
- Action: The City has continued to work with local agencies to improve the collection and reporting of information on discrimination, particularly based on religion, race and ethnicity, age, gender, marital status, presence/absence of children, and household size. These agencies include the apartment associations as well as SJFH and other nonprofit groups that regularly come into contact with groups at risk of housing discrimination.
- Action: The City has continued to work with SJFH to improve outreach to residents at risk of discrimination, using marketing, educational efforts, and partnerships with other agencies (schools, utilities, etc.) to disperse fair housing informational materials.

5. Concentration of lower-income households and minority households in less desirable neighborhoods.

- Action: The City encourages a mixture of household incomes in new developments. As part of the Annual Action Plan, the City has continued to track changes in geographic concentrations for lower-income and minority households. Additionally, the City has been working with the San Joaquin Council of Governments on understanding what factors are driving displacement risk within local communities. Through CDBG funding, the City continues to support projects that target the geographic concentrations of lower-income and minority households. These concentrations continue to be located on the eastern sides of the City.

6. Fair housing education:

- Action: The City published information online in Spanish and English about available housing services and programs in the City, specifically the Residential Repair Program, Harmony Homes project, Access Center project, CDBG program activities, rental assistance, and LIC meetings. The City also posted flyers in the resource area of City Hall regarding fair housing services and information on lead hazards in the home; this information was also provided in English and Spanish. The City has also created an online page for fair housing services information at <http://www.lodi.gov/182/Rental-Foreclosure-Assistance>. The City publishes information in Spanish to inform persons fluent in Spanish but with limited English language proficiency about the availability of housing services and programs in the City. The City also has bilingual staff available daily during business hours to assist.

CR-40 - Monitoring 91.220 and 91.230

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

The City's CDBG program is currently run by one CDBG program specialists with oversight by the Neighborhood Services Manager, who carries out the responsibilities associated with the CDBG program. The program specialist oversees reporting requirements, monitor the budget, conduct procurement activities, enforce labor compliance standards, and attend to other tasks. He is available to offer assistance and answer questions from subrecipients and are in contact with each subrecipient, at least quarterly, regarding quarterly reports or other matters. The program specialist is a contractor that is part of a team of experienced professionals that the City draws upon for expertise and assistance, as needed. The program specialist has over 3 years of experience in comprehensive implementation of the Consolidated Plan, Housing Element, Analysis of Impediments to Fair Housing, and other planning documents.

The City has developed a monitoring system to ensure that the activities carried out in furtherance of the Consolidated Plan are done so in a timely manner in accordance with the federal monitoring requirements of 24 CFR 570.501(V) and 24 CFR 85.40 and all other applicable laws, regulations, policies, and sound management and accounting practices. The objectives of monitoring are to:

- Determine if a subrecipient is carrying out its community development program, and its individual activities, as described in the application for CDBG assistance and the Subrecipient Agreement.
- Determine if a subrecipient is carrying out its activities in a timely manner, in accordance with the schedule included in the Agreement.
- Determine if a subrecipient is charging costs to the project that are eligible under applicable laws and CDBG regulations, and reasonable in light of the services or products delivered.
- Determine if a subrecipient is conducting its activities with adequate control over program and financial performance, and in a way that minimizes opportunities for waste, mismanagement, fraud, and abuse.
- Assess if the subrecipient has a continuing capacity to carry out the approved project, as well as future grants for which it may apply.
- Identify potential problem areas and assist the subrecipient in complying with applicable laws and regulations.
- Assist subrecipients in resolving compliance problems through discussion, negotiation, and the provision of technical assistance and training.
- Provide adequate follow-up measures to ensure that performance and compliance deficiencies are corrected by subrecipients, and not repeated.
- Comply with the federal monitoring requirements of 24 CFR 570.501(b) and with 24 CFR 84.51 and 85.40, as applicable.
- Determine if any conflicts of interest exist in the operation of the CDBG program, per 24 CFR 570.611.

- Ensure that required records are maintained to demonstrate compliance with applicable regulations.

The City has continued to track and report on its progress toward meeting its housing and community development goals throughout the 2021-22 program year. Pertinent information has been incorporated into this CAPER.

In recent years, the City has updated its monitoring procedures with the following improvements, per HUD’s recommendation. The policy lays out staff goals for both desk monitoring and on-site monitoring practices. When desk monitoring, the City reviews each subrecipient’s grant performance and financial documentation on a quarterly basis, at minimum. Subrecipients are selected for more in-depth on-site monitoring based on certain criteria, which are listed in the table below. When the City conducts its on-site desk monitoring, staff follows up with the subrecipients as needed to resolve any outstanding items. More specifically, the City’s policy was revised to state that 25 percent of subrecipients will be formally monitored (on-site) each program year, and that the following criteria will be used to select them.

Criteria	Rating			Selection
	0	1	2	
The amount of the applicable award	Less than \$2,500	\$2,500 to \$10,000	More than \$10,000	
Completeness and accuracy of quarterly reports and invoices	Complete	Incomplete but timely to fix	Incomplete and long delay in fixing	
Administrative capacity with emphasis on staff turnover	Adequate	Minimal gaps in capacity	Significant gaps in capacity	
Length of time as CDBG subrecipient	Less than 1 year	At least 1 year	2 or more years	
Outcome of any previous monitoring visit	No findings	Findings resolved within 60 days	Findings not resolved within 60 days	
Another factor _____.	0	1	2	
For reasons stated in the “formal monitoring” section	On-site monitoring	On-site monitoring	On-site monitoring	
Total Score:				

The City did not perform on-site monitoring for any subrecipients during the 2021-22 program year. Desk monitoring was completed during the program year.

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

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

The City provided a draft of this CAPER to the public for comment 15 days prior to the City Council public hearing on September 21, 2022. The City posted and published a notice regarding the City Council hearing on the draft CAPER.

As a public agency, the City strives to accomplish effective transparency through three methods, which are identified in the written documents: how staff solicits public comment for use of the funding, what the City has proposed to do with the grant funding, and what the City has accomplished with the use of those funds.

This CAPER was made available to the public for 15 days starting September 6, 2022 and ending September 21, 2022. [There were no public comments received regarding this CAPER.]

The 2021-22 CAPER was reviewed and approved by City Council on September 21, 2022. Upon approval, the CAPER was submitted to HUD. Please refer to the appendix at the end of this document to view the presentation for this CAPER's approval, as well as a resolution by City Council to approve of the 2021-22 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 2021-22 program year was the third year of implementing the City of Lodi's 2019-23 five-year Consolidated Plan. This Consolidated Plan set forth the priority needs and goals for the CDBG program over a five-year period, which spans from July 1, 2019, to June 30, 2023.

The 2021-22 Annual Action Plan was adopted by the City on May 5, 2021.

Due to the COVID-19 pandemic and subsequent release of CDBG-CV funding from the CARES Act, the City amended its 2019-23 Consolidated Plan to address new priority needs. The Consolidated Plan amendment included the COVID-19 Preparation, Prevention, and Response goal (Goal #11) and the Annual Action Plan amendment identified programs to meet this goal, including:

- Emergency Rental Assistance
- Basic Needs Assistance

Beginning in 2018, the City has used an assets-based strategy, instead of needs-based. While CDBG regulations and methodology principally rely on a needs-based approach, the City recognizes and values the assets-based approach as an effective way to make lasting improvements in the community and a method that better engages and empowers community members who may have been unengaged in previous processes or passive beneficiaries of such activities. Through the City's involvement with the ABCD: Love Your Block program, the City will look for opportunities to grow existing assets and involve residents in the creation and design of priority activities, in partnership with the City and other community stakeholders and resources.

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

No; however, the City of Lodi, through its Economic Development Department, received a \$300,000 brownfield assessment grant from the U.S. Environmental Protection Agency (EPA). This grant, awarded in 2020, has a three-year term and will be used to contribute to the successful revitalization and reuse of 'brownfield' sites (vacant, blighted, or otherwise underutilized properties). The grant provides funding for environmental site assessments, regulated building materials surveys (asbestos and lead paint), site cleanup and reuse planning, and related activities at publicly and privately owned sites. Use of grant funding will build on success-stories achieved by the City during its previous (fiscal year 2015) EPA brownfields assessment grant and continue to drive revitalization and beneficial reuse of underutilized brownfield sites. Although funding is available for priority projects throughout the City, specific target areas include downtown Lodi, the Union Pacific Railroad (UPRR) rail corridor that bisects the City north to south, and the federally designated Opportunity Zone. These target areas consist of approximately 230 acres bounded by the UPRR rail corridor to the west, Lodi Avenue to the north, Central Avenue to the

east, and Kettleman Lane to the south. An overarching goal is to leverage grant funding to develop a sustainable brownfields revitalization program to continue supporting site redevelopment projects that benefit all citizens of Lodi.

During the 2020-21 program year, the assessment grant funded the development of the new Lodi brownfields website, which allows Lodi property owners to nominate their parcels for assessment funds (<https://lodibrownfields.com/>). There are several potential projects in the pipeline for the 2022-23 program year that the City is hoping will come to fruition and will be reported in a future CAPER.

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

N/A