

2020-2024 Consolidated Plan DRAFT

City of Lompoc
Community Development Department
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Lompoc, CA 93436

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Executive Summary

ES-05 Executive Summary - 91.200(c), 91.220(b)

1. Introduction

The CONSOLIDATED PLAN for the City of Lompoc has been developed through analysis of data, consultations with governmental and non-profit agencies and consideration of the needs expressed by the community through the citizen participation process. The plan addresses the basic national goals of providing decent, affordable housing, a suitable living environment and expanded economic opportunities, especially for low and moderate-income persons. It sets forth a specific course of action and establishes a unified vision for the City and its residents to work together and achieve successful revitalization of the community and its neighborhoods. Specifically, the plan describes the overall housing and community development needs of the City of Lompoc and outlines a five-year strategy that establishes priorities for addressing those needs.

2. Summary of the objectives and outcomes identified in the Plan

The priorities adopted for the five-year period of July 1, 2020 through June 30, 2024 are as follows:

- Public Improvement / Parks / Infrastructure
- Emergency Repair Grants
- Assist Homeless and At-Risk of Homelessness
- Assist Non-Homeless Special Needs Populations

3. Evaluation of past performance

The City prepares the Consolidated Annual Performance Evaluation and Report (CAPER) annually, which captures progress toward meeting needs and achieving strategies established in the Consolidated Plan and the Annual Action Plan. Through monitoring of performance measures and sub-recipients, staff is able to identify operational improvements, resource allocation issues, and policy questions to be addressed in the upcoming year. Overall, the City and its partners have been successful in implementing its public services, programs and capital improvement projects.

4. Summary of citizen participation process and consultation process

The City of Lompoc has developed and implemented a Citizen Participation Plan as required by HUD. The Citizen Participation Plan sets forth the City's policies and procedures for citizen participation in the development of the Consolidated Plan documents and any subsequent amendments. The Citizen Participation Plan provides an opportunity for nonprofit service agencies and the community to work in partnership with the City to identify needs and allocate funding for affordable housing, community development and public/human services. While this plan encourages the participation of all citizens,

special assurances were made to ensure the participation of extremely-low-, low-, and moderate-income persons; persons living in areas where funds are proposed to be used; residents of assisted housing; minorities; non-English speaking persons; and persons with physical disabilities.

Community involvement is an important factor in identifying projects for funding. To meet that objective, the City held two Needs Assessment Workshops, one which was noticed on the local news and held at the public Anderson Recreation Center located at 125 West Walnut Avenue on Thursday, November 21, 2020, at 10:00 a.m., and another during a publicly noticed pre-application workshop held by the City on Monday, December 2, 2020, at City Hall. Notifications were published in the Lompoc Record.

Additional Community Outreach

Community Development Division staff outreached with an online survey by way of the City Website, social media and direct emails to city stakeholders in order to provide the community's perception of public service activity funding priorities to the Human Services Commission. 98 surveys were submitted.

Public Comment Period

The City of Lompoc held a 30-day public comment period for the 2020-21 Action Plan from March 22, 2020, through April 21, 2020, and then for an additional 7 business day public comment period from June 8, 2020, through June 16, 2020. The City held a 7 business day comment period for the 5 Year Consolidated Plan from July 13, 2020, through July 21, 2020. Notices were published in both English and Spanish in the local newspaper (The Lompoc Record) and on the City's website (www.cityoflompoc.com).

An email announcing the public review period was also distributed to a list of approximately 50 interested parties, and included a link to the City's website where the document was posted.

The draft Consolidated Plan and Annual Action Plan were posted on the City of Lompoc website located at cityoflompoc.com.

The public notices, widely distributed email, and website encouraged citizens to provide their verbal or written comments about the proposed funding goals for housing, homelessness, economic development, and community development needs, and its funding priorities, objectives, proposed actions, and projects identified in the Annual Action Plan. The website also provided citizens an opportunity to easily submit comments electronically to City staff.

Consultations

In compiling the data and information needed for the Consolidated Plan and the Annual Action Plan, it was necessary to consult with many groups and agencies in the Lompoc area. Among them were social service agencies that provided information concerning housing and community development needs, particularly of children, the elderly, the disabled, and persons who are homeless or at risk of homelessness.

5. Summary of public comments

No written comments were received during the 7 business-day public review period from July 13, 2020, through July 21, 2020, for the complete Consolidated Plan nor for the 2020 Annual Action Plan from March 22, 2020, through April 21, 2020, and June 8, 2020, through June 16, 2020.

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

The City did not receive any comments or views that were not accepted; therefore this section is not applicable.

7. Summary

Community needs expressed by the public through both written and oral communications (in no particular order).

- Economic Development (Job Creation & Retention)
- Park Improvements
- Public Facilities Improvements
- Public Infrastructure
- Youth Serving Programs
- Affordable Housing
- Homeless Services
- Code Enforcement
- Mental Health Services
- Minor Home Repair
- Childcare
- Food Distribution
- Senior Services
- Substance Abuse and Treatment
- Adult Education
- Affordable Rental Housing
- Affordable Homeownership
- Veteran Services
- Code Enforcement

The Process

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

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

The following are the agencies/entities responsible for preparing the Consolidated Plan and those responsible for administration of each grant program and funding source.

Agency Role	Name	Department/Agency
CDBG Administrator	LOMPOC	Community Development Department

Table 1- Responsible Agencies

Narrative

The City of Lompoc's Community Development Department is the lead department for the administration of the City's CDBG funds. The County of Santa Barbara is the lead agency for Santa Barbara County HOME Consortium, in which Lompoc participates.

Consolidated Plan Public Contact Information

City of Lompoc Community Development Department

PR-10 Consultation - 91.100, 91.110, 91.200(b), 91.300(b), 91.215(l) and 91.315(l)

1. Introduction

This section reviews the stakeholder consultation process conducted for the City of Lompoc 2020-2024 Consolidated Plan.

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

The City of Lompoc is within the Santa Maria/Santa Barbara County CoC. Homeless persons or those at risk of becoming homeless are also served by Good Samaritan Shelters, Inc. and the South Coast Homeless Prevention and Rapid Re-Housing Program (HPRP).

The Homeless Prevention and Rapid Re-housing Program (HPRP) is a collaboration between Home for Good Santa Barbara County, PATH (People Assisting the Homeless), Catholic Charities, Legal Aid Foundation, Transition House, Rental Housing Mediation Task Force, Family Service Agency, and the City and County of Santa Barbara. The services offered include help locating housing; financial assistance for rent due, security deposits, utilities and moving costs; legal aid to inform people of their rights; and mediation to help prevent evictions. The services are available to people who have an income of 50% or less than the Area Median Income, and are at risk of becoming homeless, or are currently homeless.

The City of Lompoc also includes funding from CDBG in its Strategic Plan.

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

As mentioned in the previous section, the City works closely with Home for Good Santa Barbara County, along with local homeless providers in addressing the needs of the homeless and those at-risk of homelessness.

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

The City does not receive ESG funds.

Describe Agencies, groups, organizations and others who participated in the process 2. and describe the jurisdictions consultations with housing, social service agencies and other entities

Table 2- Agencies, groups, organizations who participated

1	Agency/Group/Organization	COUNTY OF SANTA BARBARA
	Agency/Group/Organization Agency/Group/Organization Type What section of the Plan was addressed by Consultation?	Housing Services - Housing Services-Children Services-Elderly Persons Services-Persons with Disabilities Services-Persons with HIV/AIDS Services-Victims of Domestic Violence Services-homeless Services-Health Services - Victims Health Agency Child Welfare Agency Publicly Funded Institution/System of Care Other government - County Regional organization Planning organization Private Sector Banking / Financing Housing Need Assessment Lead-based Paint Strategy
		Homelessness Strategy Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Non-Homeless Special Needs HOPWA Strategy Anti-poverty Strategy
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Santa Barbara County, Housing and Community Development Division is the lead agency for the preparation of the HOME Consortium Consolidated Plan. In addition, the departments of Planning and Development and General Services were interviewed.
2	Agency/Group/Organization	Housing Authority of the County of Santa Barbara
	Agency/Group/Organization Type	РНА
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Public Housing Needs

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	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	The director of housing development was interviewed and representatives attended a community focus group. Information was requested on the housing authority's self-sufficiency programs for residents, the perceived needs of public housing residents and voucher holders, and the status of the general public housing and Section 8 waiting lists. The Housing Authority is one of the County's primary affordable housing developers and is an active participant in the Continuum of Care coordinating efforts.
3	Agency/Group/Organization	INDEPENDENT LIVING RESOURCE CENTER
	Agency/Group/Organization Type	Services-Persons with Disabilities
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Non-Homeless Special Needs
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Organization assisted in the recruitment of participants for the individuals with disabilities focus group. Organization representatives also participated in the stakeholder focus group. More detail is provided in the Consultation and Citizen Participation appendix.
4	Agency/Group/Organization	Peoples Self-Help Housing Corporation
	Agency/Group/Organization Type	Services - Housing
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Non-Homeless Special Needs
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	The organization assisted in the recruitment of participants for the Hispanic focus group. Representatives of People's Self-Help Housing also participated in the stakeholder focus group. More detail is provided in the Consultation and Citizen Participation appendix. PSHHC is one of the County's primary affordable housing developers, developing housing for families, seniors, and farmworkers and their families.
5	Agency/Group/Organization	DOMESTIC VIOLENCE SOLUTIONS FOR SANTA BARBARA COUNTY
	Agency/Group/Organization Type	Services - Housing Services-Children Services-Victims of Domestic Violence Services-homeless Services - Victims

	What section of the Plan was addressed by Consultation?	Housing Need Assessment Non-Homeless Special Needs
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Interviewed organization executive director. Information was requested on the housing and supportive service needs of victims of domestic violence. More detail is provided in the Consultation and Citizen Participation appendix.
6	Agency/Group/Organization	GOOD SAMARITAN SHELTER
	Agency/Group/Organization Type	Services - Housing Services-Children Services-Victims of Domestic Violence Services-homeless Services-Trafficking
	What section of the Plan was addressed by Consultation?	Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Organization attended a community focus group. Organization is the largest homeless services provider in the area, serving families and individuals experiencing homelessness in the northern end of the county. Information was requested on the housing and supportive service needs of individuals and families experiencing homelessness. More detail is provided in the Consultation and Citizen Participation appendix. Good Sam acquires and operates shelters and group homes for persons with special needs, including homeless, homeless veterans, domestic violence victims and their children, and victims of human trafficking. Good Sam is an active participant in the Continuum of Care coordinating efforts.
7	Agency/Group/Organization	Jodi House Brain Injury Support Center
	Agency/Group/Organization Type	Services-Persons with Disabilities
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Non-Homeless Special Needs

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	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Representatives of Jodi House participated in the stakeholder focus group. More detail is provided in the Consultation and Citizen Participation appendix.
8	Agency/Group/Organization	PEOPLE ASSISTING THE HOMELESS (PATH)
	Agency/Group/Organization Type	Services - Housing Services-homeless
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Organization attended a community focus group. Information was requested on the housing and supportive service needs of individuals experiencing homelessness in the southern part of the county. More detail is provided in the Consultation and Citizen Participation appendix. PATH is a primary operator of homeless services and shelter in south Santa Barbara County and is an active participant in the Continuum of Care coordinating efforts.
9	Agency/Group/Organization	LEGAL AID FOUNDATION OF SANTA BARBARA COUNTY
	Agency/Group/Organization Type	Services - Housing Service-Fair Housing
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Interviewed organization. Information was requested on issues of fair housing and services provided to the community in support of fair housing rights. More detail is provided in the Consultation and Citizen Participation appendix. County HCD contracts with a qualified agency, currently, Legal Aid to provide fair housing services for the residents of the County to assist the County in furthering fair housing and combatting housing discrimination.

10	Agency/Group/Organization	COMMUNITY ACTION COMMISSION OF SANTA BARBARA COUNTY
	Agency/Group/Organization Type	Services - Housing Services-Children Services-Elderly Persons Economic Development
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Market Analysis
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Organization attended a community focus group. Information was requested on the housing and supportive service needs of individuals vulnerable populations. More detail is provided in the Consultation and Citizen Participation appendix.
11	Agency/Group/Organization	Planned Parenthood of Central Coast
	Agency/Group/Organization Type	Services-Health Services-Families
	What section of the Plan was addressed by Consultation?	Housing Need Assessment
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Organization attended a community focus group. Information was requested on health needs of women. More detail is provided in the Consultation and Citizen Participation appendix.
12	Agency/Group/Organization	HABITAT FOR HUMANITY
	Agency/Group/Organization Type	Services - Housing
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Market Analysis
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Organization attended a community focus group. Information was requested on low income housing needs especially homeownership housing opportunities. More detail is provided in the Consultation and Citizen Participation appendix.

13	Agency/Group/Organization	YMCA
	Agency/Group/Organization Type	Services-Children
		Services-Education
		Services-Families
	What section of the Plan was addressed by Consultation?	Non-housing Needs Assessment
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the	Organization attended a community focus group. Information was requested on needs families and children. More detail is provided in the Consultation and Citizen Participation appendix.
	consultation or areas for improved coordination?	
14	Agency/Group/Organization	COMMUNITY PARTNERS IN CARING
	Agency/Group/Organization Type	Services-Elderly Persons
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Non-Housing Needs Assessment
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Organization attended a community focus group. Information was requested on needs of seniors. More detail is provided in the Consultation and Citizen Participation appendix.
15	Agency/Group/Organization	Santa Barbara Community Housing Corporation
	Agency/Group/Organization Type	Services - Housing Services-Special Needs Populations
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Market Analysis
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Organization attended a community focus group. Information was requested on housing needs of low income families and vulnerable populations. More detail is provided in the Consultation and Citizen Participation appendix.
16	Agency/Group/Organization	Women's Economic Ventures
	Agency/Group/Organization Type	Services-Employment Economic Development

	What section of the Plan was addressed by Consultation?	Non-Homeless Special Needs Market Analysis
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Organization attended a community focus group. Information was requested on job training, business development, and needs of small business owners. More detail is provided in the Consultation and Citizen Participation appendix.
17	Agency/Group/Organization	NEW BEGINNINGS COUNSELING CENTER
	Agency/Group/Organization Type	Services - Housing Services-homeless
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Organization attended a community focus group. Information was requested on needs of people experiencing homelessness, in particularly needs of the homeless living in their vehicles. More detail is provided in the Consultation and Citizen Participation appendix.
18	Agency/Group/Organization	Band of Brothers
	Agency/Group/Organization Type	Services-homeless Services-Veterans
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Homeless Needs - Chronically homeless Homelessness Needs - Veterans Non-Housing Needs Assessment
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Organization attended a community focus group. Information was requested on needs of veterans including those experiencing homelessness. More detail is provided in the Consultation and Citizen Participation appendix.
19	Agency/Group/Organization	Lompoc Valley Chamber of Commerce
	Agency/Group/Organization Type	Economic Development

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	What section of the Plan was	Housing Need Assessment
	addressed by Consultation?	Market Analysis
	How was the	Organization attended a community focus group.
	Agency/Group/Organization	Information was requested on economic development
	consulted and what are the	needs of Lompoc. More detail is provided in the
	anticipated outcomes of the	Consultation and Citizen Participation appendix.
	consultation or areas for improved	
	coordination?	
20	Agency/Group/Organization	Good Samaritan Mark's House (Transitional Housing)
	Agency/Group/Organization Type	Housing
		Services - Housing
		Services-Children
		Services-homeless
		Services-Education
		Services-Employment
		Regional organization
	What section of the Plan was	Housing Need Assessment
	addressed by Consultation?	Homeless Needs - Families with children
	How was the	This organization was invited to submit comments related
	Agency/Group/Organization	to housing, homeless services and other issues relevant to
	consulted and what are the	the Action Plan.
	anticipated outcomes of the	
	consultation or areas for improved	
	coordination?	
21	Agency/Group/Organization	FOODBANK OF SANTA BARBARA COUNTY
	Agency/Group/Organization Type	Services-Children
		Services-Elderly Persons
		Publicly Funded Institution/System of Care
		Regional organization
	What section of the Plan was	Non-Homeless Special Needs
	addressed by Consultation?	Anti-poverty Strategy
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	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	This organization was invited to submit comments related to services for low-income people including seniors, children, special needs populations and others regarding anti-poverty strategy and other issues relevant to the Action Plan. The anticipated outcome of the consultation was to improve coordination with a regional organization whose mission is to eliminate hunger by providing food, education and other resources to a network of hunger-relief charities and their communities. The mission of the Foodbank is to provide nourishment to those in need by acquiring and distributing safe nutritious foods via local agencies and providing education to solve hunger and nutrition problems in Santa Barbara County.
22	Agency/Group/Organization	PEOPLES SELF-HELP HOUSING
	Agency/Group/Organization Type	Housing Services - Housing Services-Elderly Persons Services-Persons with Disabilities Services-homeless Services-Health Services-Education Service-Fair Housing Regional organization
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Homelessness Strategy Homeless Needs - Families with children Non-Homeless Special Needs
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	This organization was contacted to request comments on housing and other services for low-income people. The anticipated outcomes of the consultation were to improve coordination with this regional organization whose mission is to provide affordable housing and programs leading to self-sufficiency for low-income families, seniors, and other special needs groups on California's Central Coast, including Lompoc. The organization also provides clinical case management and social services including a health clinic and educational services for low-income people.

23	Agency/Group/Organization	Santa Barbara County Association of Governments			
	Agency/Group/Organization Type	Housing Other government - County Regional organization Planning organization			
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Market Analysis			
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	The Santa Barbara County Association of Governments (SBCAG) is an association of city and county governments in Santa Barbara County. Many of the issues that face local governments and the people they serve such as traffic, housing, air quality, and growth extend beyond jurisdictional boundaries. This agency was contacted to request comments on housing, particularly affordable housing, for low-income people. The anticipated outcome of the consultation was to improve coordination with this agency whose mission is to assist local governments in solving common problems and addressing public policy issues that are regional or multi-jurisdictional. SBCAG exists to provide a forum for regional collaboration and cooperation between agencies.			
24	Agency/Group/Organization	United Way of Santa Barbara County			
	Agency/Group/Organization Type	Housing Services-Children Services-Health Services-Education			
	What section of the Plan was addressed by Consultation?	Homelessness Strategy Anti-poverty Strategy			
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	This agency was contacted to request comments on housing, education, health and anti-poverty strategies for low-income people. The anticipated outcome of the consultation was to improve coordination with this agency whose mission is to provide programs in education, financial empowerment and health for low-income people. Specifically, the organization seeks to help children, youth and seniors achieve their potential through educational programs; help families achieve financial stability and independence; and to improve people's health through preventative care and health care.			

25	Agency/Group/Organization	Valley Haven Adult Day Care Center			
	Agency/Group/Organization Type	Services-Elderly Persons			
		Services-Persons with Disabilities			
	What section of the Plan was	Non-Homeless Special Needs			
	addressed by Consultation?				
	How was the	This agency was contacted to request comments on			
	Agency/Group/Organization	services for seniors. The anticipated outcome of the			
	consulted and what are the	consultation was to improve coordination with this agency			
	anticipated outcomes of the	whose mission is to preserve and enrich the quality of life			
	consultation or areas for improved	for aging and dependent adults (including those with			
	coordination?	dementia) through innovative programs.			
26	Agency/Group/Organization	UNITED BOYS & GIRLS CLUB OF SANTA BARBARA COUNTY			
	Agency/Group/Organization Type	Services-Children			
		Services-Education			
	What section of the Plan was	Anti-poverty Strategy			
	addressed by Consultation?				
	How was the	This agency was contacted to request comments on			
	Agency/Group/Organization	services for youth. The anticipated outcome of the consultation was to improve coordination with this agency whose mission is to enable all young people, especially,			
	consulted and what are the				
	anticipated outcomes of the				
	consultation or areas for improved	those at-risk, to reach their full potential as productive,			
	coordination?	caring, and responsible citizens.			
27	Agency/Group/Organization	Channel Islands YMCA			
	Agency/Group/Organization Type	Housing			
		Services-Children			
		Services-Health			
		Services-Education			
		Regional organization			
	What section of the Plan was	Homelessness Needs - Unaccompanied youth			
	addressed by Consultation?	Anti-poverty Strategy			
	How was the	This agency was contacted to request comments on			
	Agency/Group/Organization	services for youth. The anticipated outcome of the			
	consulted and what are the	consultation was to improve coordination with this agend			
	anticipated outcomes of the	whose mission is to build healthy, confident, connected			
	consultation or areas for improved	and secure children, adults, families and communities.			
	coordination?				

28	Agency/Group/Organization	Santa Barbara County Rape Crisis and Child Protection Center			
	Agency/Group/Organization Type	Services-Victims of Domestic Violence Services-Health Services - Victims			
	What section of the Plan was addressed by Consultation?	Non-Homeless Special Needs Anti-poverty Strategy			
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	This organization was invited to submit comments. The anticipated outcome of the consultation was to improve coordination with this agency whose mission is to empower people through healing and social change to eliminate all forms of sexual violence.			
29	Agency/Group/Organization	CHILD ABUSE LISTENING & MEDIATION (CALM)			
	Agency/Group/Organization Type	Services-Children Services-Victims of Domestic Violence Services - Victims Child Welfare Agency Regional organization			
	What section of the Plan was addressed by Consultation?	Non-Homeless Special Needs Anti-poverty Strategy			
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	This organization was invited to submit comments. The anticipated outcome of the consultation was to improve coordination with this agency whose mission is to prevent, assess, and treat child abuse by providing comprehensive, culturally competent services for children, families and adults.			
30	Agency/Group/Organization	Home for Good Santa Barbara County Funders Collaborative			
	Agency/Group/Organization Type	Services-homeless Regional organization			
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Homelessness Strategy Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth			

	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	This organization was invited to submit comments. The anticipated outcome was to improve coordination with this agency whose mission is to prevent and reduce homelessness.
31	Agency/Group/Organization	North County Rape Crisis Center
	Agency/Group/Organization Type	Regional organization
	What section of the Plan was	Non-homeless Special Needs
	addressed by Consultation?	Services – Victims
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	This organization attended a public meeting and was invited to submit comments.
32	Agency/Group/Organization	Lompoc Tsunami Aquatics
	Agency/Group/Organization Type	Regional organization
	What section of the Plan was addressed by Consultation?	Services – Children
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	This organization attended a public meeting and was invited to submit comments.
33	Agency/Group/Organization	Stages Rehearsal Studio
	Agency/Group/Organization Type	Regional organization
	What section of the Plan was addressed by Consultation?	Services – Children

	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	This organization attended a public meeting and was invited to submit comments.
34	Agency/Group/Organization	Transitions Mental Health Association
	Agency/Group/Organization Type	Regional organization
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Homelessness Strategy Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Non-homeless Special Needs Services - Victims Services-Children Services-Victims of Domestic Violence
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	This organization attended a public meeting and was invited to submit comments.

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

N/A; The Consolidated Plan process provided an opportunity and invited participation and comments from all relevant organizations and agencies.

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

Name of Plan	Lead Organization	How do the goals of your Strategic Plan overlap with the		
		goals of each plan?		
Continuum of	Santa Barbara	Santa Barbara County HCD identifies gaps in homeless		
Care	County Housing and	program funding and applies to HUD for CoC funds		
	Community	annually for new and renewing projects based on local		
	Development	needs and priorities. The City of Lompoc also includes		
		funding for homeless programs as a priority in its Strategic		
		Plan.		
General Plan	City of Lompoc	The Housing Element includes many goals that are		
Housing Element		consistent with the Strategic Plan's including promotion of		
		fair housing for all; provision of special needs housing;		
		preservation of existing housing; and production of new		
		affordable housing.		
Regional AI to	Santa Barbara	Affirmatively further fair housing		
Fair Housing	County Housing and			
Choice	Community			
	Development			

Table 3- Other local / regional / federal planning efforts

Describe cooperation and coordination with other public entities, including the State and any adjacent units of general local government, in the implementation of the Consolidated Plan (91.215(I))

The City consulted with the Continuum of Care, the HOME Consortium and Urban County member jurisdictions, and the Santa Barbara County Housing Authority.

Narrative

Please note that all relevant housing and supportive service providers in Santa Barbara County were invited to participate in the Consolidated Plan process, including the Housing Authority of the County of Santa Barbara, stakeholders from nonprofit entities (organizations serving low and moderate income persons, housing and service providers, and local fair housing organizations) as well as private sector entities such as banks and other financial institutions, developers, rental companies, landlords, and realtors.

PR-15 Citizen Participation - 91.105, 91.115, 91.200(c) and 91.300(c)

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

Annually the City conducts a minimum of one public hearing to allow the public an opportunity to comment on the Consolidated Plan and/or Annual Action Plan as well as the Consolidated Annual Performance Evaluation and Report. All public hearing meetings are advertised in the Lompoc Record and on the City's website. An initial pre-application public meeting was held on December 2, 2019, where the public was invited to attend and agencies were given an opportunity to discuss community needs.

A 7-day public comment period, from July 13, 2020, to July 21, 2020, was then provided to give the public the opportunity to review the City's stated priorities for its 2020-2021 CDBG program and submit comments. This public comment period was advertised in the Lompoc Record and on the City's website.

As the lead for the County's HOME Consortium, the County's Consolidated Plan includes strategies for use of HOME funds. The County's Consolidated Plan was available for public comment from April 3 through May 5, 2020. A public hearing was held on May 5, 2020. Notices for the comment period and public hearing were placed in local newspapers.

Further, community focus groups, an online survey, and stakeholder interviews were conducted to ensure a broader outreach for citizen participation.

Annual Action Plan

Annually the City conducts a minimum of one public hearing to allow the public an opportunity to comment on the Consolidated Plan and/or Annual Action Plan as well as the CAPER. All public hearing meetings are advertised in the Lompoc Record and on the City's website. Two public hearings were held for the 2020-2021 Action Plan. One hearing was held on April 21, 2020, and another on June 16, 2020. A 7-day public comment period, from July 13, 2020, to July 21, 2020, was then provided to give the public the opportunity to review the City's stated priorities for its 2020-2021 CDBG program and submit comments. That public comment period was advertised in the Lompoc Record and on the City's website.

Citizen Participation Outreach

Sort	Mode of Outreach	Target of Outreach	Summary of	Summary of	Summary of comments	URL
Order			response/attendance	comments received	not accepted	
					and reasons	
1	Focus Group -	Minorities	Please see	Please see Consultation	Please see Consultation	
	Lompoc		Consultation and	and Citizen Participation	and Citizen	
		Non-English Speaking -	Citizen Participation	appendix.	Participation appendix.	
		Specify other language:	appendix.			
		Spanish				
		Persons with disabilities				
		Non-targeted/broad				
		community				
		,				
		Residents of Public and				
		Assisted Housing				
		Social Services Advocacy and				
		Non-Profit services providers				

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL
2	Focus Group -	Minorities	Please see	Please see Consultation	Please see Consultation	
	Lompoc		Consultation and	and Citizen Participation	and Citizen	
		Non-English Speaking -	Citizen Participation	appendix.	Participation appendix.	
		Specify other language:	appendix.			
		Spanish				
		Persons with disabilities				
		Non-targeted/broad				
		community				
		Residents of Public and				
		Assisted Housing				
		Affordable Housing				
		Developers and other				
		Stakeholders				
3	Focus Group -	Non-targeted/broad	An online community	The survey explored	All comments were	
	Lompoc	community	survey was	issues related to housing	accepted.	
			conducted in both	choice, barriers and		
			English and Spanish.	challenges facing		
				respondents related to		
				housing, and explored		
				the ways in which		
				people had experienced		
				discrimination.		

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted	URL
4	Facus Croup	Targeted outrooch	The City contacted	The interviews evalured	and reasons	
4	Focus Group -	Targeted outreach	The City contacted	The interviews explored	All comments were	
	Lompoc		stakeholders for their	issues related to	accepted.	
			local perspective on	housing, public services,		
			issues address in the	economic development,		
			Consolidated Plan.	infrastructure,		
				community		
				revitalization, fair		
				housing, and fair		
				housing choice.		
5	Public Hearing	Non-targeted/broad	INSERT SUMMARY	INSERT SUMMARY	Not applicable	
		community				
6	Newspaper Ad	Minorities	Not applicable	None	Not applicable	
		Non-English Speaking -				
		Specify other language:				
		Spanish				
		Non-targeted/broad				
		community				
		Noticing was in English and				
		Spanish				
7	Internet Outreach	Non-targeted/broad	Not applicable	None	Not applicable	
		community				

Table 4– Citizen Participation Outreach

Needs Assessment

NA-05 Overview

Needs Assessment Overview

During the Consolidated Planning process the City of Lompoc identified a number of needs that grant funds will be used to address. Those needs were identified through numerous methods including consultation with key stakeholders, public forums, quantitative research, and institutional knowledge of previous successful programs. The needs of the City fall into three categories: public facilities, public improvements, and public services. Activity details for each of those categories are provided in NA-50 Non-Housing Community Development Needs.

Community Development Needs - 91.415, 91.215 (f)

Describe the jurisdiction's need for Public Facilities:

The City of Lompoc has identified the need for improved access to public facilities and has included a goal in the Strategic Plan:

Goal No 2— Public Improvement / Parks / Infrastructure: Revitalize existing neighborhoods in low- and moderate-income areas by upgrading public facilities, such as parks and recreation facilities including ADA Improvements. That goal strives to improve neighborhood infrastructure and access to basic services for low income and special needs populations.

How were these needs determined?

These needs were determined through meetings with various public officials and citizens, statistical analysis, and reviews of previous successes and areas of improvement in the City.

Describe the jurisdiction's need for Public Improvements:

The City of Lompoc has identified the need for the expansion and improvements of public infrastructure and has included a goal in the Strategic Plan:

Goal No 2— Public Improvement / Parks / Infrastructure: Revitalize existing neighborhoods in low- and moderate-income areas by upgrading public facilities, such as parks and recreation facilities including ADA Improvements. This goal strives to improve neighborhood infrastructure and access to basic services for low income and special needs populations.

How were these needs determined?

These needs were determined through meetings with various public officials and citizens, statistical analysis, and reviews of previous successes and areas of improvement in the City.

Describe the jurisdiction's need for Public Services:

The City of Lompoc has identified the need for public services for the LMI and special needs population and has included a goal in the Strategic Plan:

Goal No 2— Emergency Repair Grants: Emergency Repair Grants for seniors and other low-income households facilitating emergency repairs to the property and safeguarding against imminent danger to human life health, safety, and to protect the property from further structural damage due to natural disaster, fire, or structural collapse.

Goal No -3— Assist Homeless and At-Risk of Homelessness: This goal includes activities targeted to persons and families experiencing and at-risk of homelessness.

Goal No 4— Assist Non-Homeless Special Needs Populations: This goal consists of activities to help non-homeless persons with special needs access needed supportive services and facilities, as well as to provide affordable and accessible housing.

How were these needs determined?

These needs were determined through meetings with various public officials and citizens, statistical analysis, and reviews of previous successes and areas of improvement in the City.

Housing Market Analysis

MA-05 Overview

Housing Market Analysis Overview:

This Market Analysis includes an analysis of the workforce and economic factors in Lompoc. This section also looks at the concentrations of housing problems and where minority populations might be affected. Non-housing community development resources and strategies are also discussed. The analysis in this section is supplemented by GIS maps to provide geographical visualization of the data.

It should be noted that in 1992, the City of Lompoc adopted a policy that requires all residential development of ten units or more to provide 10 % of the units affordable to very low-, low-, and median-income households. In 1997, that policy was amended to require that projects located within the City's Old Town Redevelopment Project, Amendment No. 2 area provide 15% of new housing affordable to low-and moderate-income households with at least 40% of those units to be reserved for very low-income households. This action was followed in 2003 with the codification of a formal Housing In-Lieu Fee Program by adoption of Ordinance No. 1492(03). Currently, several developments are underway in Lompoc that will increase the supply of affordable housing. These developments are listed below:

Project Name / No. / Location / Contact / Project Planner	Description	Notes
Summit View Homes 44 new residential units DR 12-04, LOM 594, Annex No 78, GP 12-01, ZC 12-01 Northeast corner of Harris Grade Rd & Purisima Rd	44 unit residential development for Summit View Homes 5 of 44 Completed	Housing with 5-10% Affordable Housing as required by the City's Inclusionary Housing Ordinance Model homes are complete.
HACSB 15-unit Affordable Housing CUP 18-04 1401 East Cypress Avenue	Proposed 15 affordable one- bedroom apartments with parking and landscaping	100% Affordable Housing funded with HOME funds

Castillo de Rosas DR 19-04, LOM 616 109 South Third Street	Proposed 24 residential condominiums	Housing with 10% Affordable Housing as required by the City's Inclusionary Housing Ordinance
Burton Ranch – Martin Tentative Tract Map LOM 571 APN's: 097-250-013 & -040	64 SF Parcels & 1 Apartment Lot Parcel	Housing with 10% Affordable Housing as required by the City's Inclusionary Housing Ordinance
Burton Ranch – Jensen 55 residential units, new construction DR 07-02, LOM 567	55 residential units	Housing with 10% Affordable Housing as required by the City's Inclusionary Housing Ordinance
Burton Ranch – Towbes 210 residential units, new construction DR 07-01, LOM 570	210 residential units	Housing with 10% Affordable Housing as required by the City's Inclusionary Housing Ordinance
River Terrace / Coastal Vision 308 residential dwelling units with approx. 17,650 sq. ft. of commercial space, new construction DR 04-03, EIR 04-01, LOM 533 Laurel Avenue and Twelfth Street APN: 099-141-021	224 residential dwelling units, approx. 17,666 sq. ft. commercial	Housing with 10% Affordable Housing as required by the City's Inclusionary Housing Ordinance

MA-45 Non-Housing Community Development Assets - 91.410, 91.210(f) Introduction

There are many factors that are not directly related to housing that have an impact on the supply and demand for housing. The availability of jobs in the City, the education levels of the labor force, and commuting data all have an indirect impact on housing. In this section, these factors will be identified and discussed to identify any components that may have a significant impact on how grant funds will be used by the City.

Economic Development Market Analysis

Business Activity

Business by Sector	Number of Workers	Number of Jobs	Share of Workers %	Share of Jobs %	Jobs less workers %
Agriculture, Mining, Oil & Gas Extraction	1,314	163	8	2	-6
Arts, Entertainment, Accommodations	2,371	2,093	14	27	13
Construction	1,135	2	7	0	-7
Education and Health Care Services	3,653	1,482	21	19	-2
Finance, Insurance, and Real Estate	783	112	5	1	-4
Information	102	56	1	1	0
Manufacturing	1,658	337	10	4	-6
Other Services	956	1,082	5	14	9
Professional, Scientific, Management Services	1,337	433	8	6	-2
Public Administration	1,232	300	7	4	-3
Retail Trade	2,248	57	13	1	-12
Transportation & Warehousing	479	1,097	3	14	11
Wholesale Trade	123	584	1	7	6
Grand Total	17,391	7,798			

Table 5 - Business Activity

Data Source: 2013-2017 ACS (Workers), 2017 Longitudinal Employer-Household Dynamics (All Jobs)

Data Source Comments: The most recent LEHD data for job was 2017. To maintain time period consistency, the 2013-2017 ACS was used for comparison.

Share of Workers

In the City of Lompoc, there is a significant disconnect between the number of jobs and the number of workers. There are over 17,000 workers, but less than 8,000 jobs available. Even if every person in the labor force in the City is employed, there is still a need for over 9,000 more jobs in the City.

All but three business sectors (Other Services, Transportation & Warehousing, and Wholesale Trade), consist of more workers than the number of available jobs. The supply of workers is not met with a strong

demand of jobs. The business sector that has the largest disconnect in workers and jobs is the Retail Trade sector. In this sector, there are 2,248 workers, but only 57 jobs available. The Education and Health Care Services sector has the second largest gap, with 3,653 available workers and only 1,482 jobs. When there are not enough jobs to support the supply of workers, those workers are forced to earn their living in a different city than they live in, which may substantially increase commuting time and expenses such as fuel and childcare.

Labor Force

Total Population in the Civilian Labor Force	19,451
Civilian Employed Population 16 years and over	17,254
Unemployment Rate	5.2%
Unemployment Rate for Ages 16-24	23.7%
Unemployment Rate for Ages 25-65	9.0%

Table 6 - Labor Force

Data Source: 2014-2018 ACS

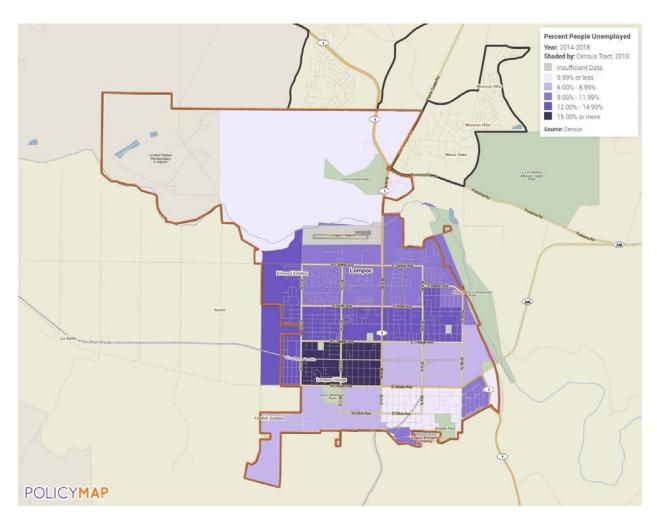
Unemployment Rate Over Time

A major factor in a household's ability to afford housing is the availability of jobs within the jurisdiction. There are two primary sources used to analyze the unemployment rate in the City for this report. They each have pros and cons, but when considered together they can provide a clearer view of unemployment in the City.

The first source is the US Census Bureau's American Community Survey (ACS) 5-Estimates. In the ACS, unemployment data is only taken annually, and the most recent data is from 2018. It is also an average of the five years included, which does not necessarily provide an accurate view of recent employment trends. However, the ACS data is available at a census tract level and can help identify any areas that have disproportionately high unemployment.

The second source is the Bureau of Labor Statistics. This measurement of unemployment is updated monthly and provides insight into any trends at the city-level. It is not available at the census tract level and therefore provides a look at employment as it relates to time, while the ACS looks at employment as it relates to space.

In the City, there is a wide variance in employment rates between different tracts shown in the map below. The tracts in the southcentral part of the City have the highest unemployment rates, some tracts with over 15% unemployment. The unemployment rate generally shrinks lower as you move away from southcentral Lompoc, where the unemployment is less than 6% in some tracts.



Unemployment Rate Over Time

The unemployment rate in the City dropped significantly from 2010 to 2019, going from 12.5% down to 5.0%. However, according to the Bureau of Labor Statistics, the unemployment rate fluctuated back up to 7.4% in January 2019 and then decreased to 3.8 in September 2019. There was another significant increase from March 2020 to April 2020, which is likely due to the COVID-19 pandemic that forced an overwhelming portion of businesses to temporarily close. Overall and with all things equal, Lompoc has seen a consistent decease in unemployment since 2010. The City will need to implement new strategies to recover its unemployment rate back down to a healthy rate as it recovers from the impacts of COVID-19.

2010	2011	2012	2013	2014	2015	2016	2017	2018	2019
12.5	12.1	10.8	9.4	8.0	6.9	6.9	6.0	5.2	5.0

Table 7 - Unemployment Rate Over Time

Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sept	Oct	Nov	Dec	Jan	Feb	Mar	Apr
2019												2020			
7.4	6.5	6.1	4.7	4.2	4.7	4.9	4.4	3.8	3.8	4.5	5.0	6.3	6.0	7.8	18.8

Table 2 - Unemployment Rate from January 2019 to April 2020

Occupations by Sector	Number of People
Management, business and financial	4,002
Farming, fisheries and forestry occupations	910
Service	4,943
Sales and office	3,632
Construction, extraction, maintenance and repair	1,402
Production, transportation and material moving	2,365

Table 8 – Occupations by Sector

Data Source: 2014-2018 ACS

Occupations by Sector

In the above table the occupations by sector is analyzed. Instead of showing which sectors are most common in the City, as the table at the beginning of this section did, this shows what type of jobs are available in each sector. For example, this table would include a manger of a fast food restaurant and the manager of a logging company in the same category (Management, Business, and Financial) while in the earlier table they would be in separate categories.

Within the City, the most prominent sector is the Service sector, however the Management, business, and financial sector has only about 900 less people in it. Together these two sectors, approximately 27% each, make up 52% of all jobs in the City. The Sales and office sector makes up another 21% of the jobs in the City. The remaining sectors combined, Farming, fisheries, and forestry occupants, Construction, extraction, maintenance, and repair, and Production, transportation and material moving, include 4,677 workers and make up 27% of the jobs in the City of Lompoc.

Travel Time

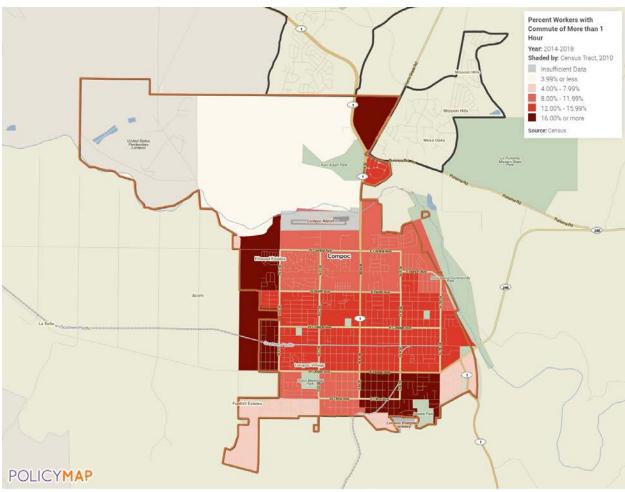
Travel Time	Number	Percentage
< 30 Minutes	9,592	58%
30-59 Minutes	4,779	29%
60 or More Minutes	2,069	13%
Total	16,440	100%

Table 9 - Travel Time

Data Source: 2014-2018 ACS

Commute Travel Time

All other things being equal, residents would rather live in the same city as their job. Relative to short commutes and long commute times are associated with lower life satisfaction, increased stress, obesity, anxiety, depression, and increased exposure to pollutants. Residents with shorter commute times have a higher quality of life and more time to be active. In the City, long commute times are a significant issue as shown in the map below. From the business section, there are significantly more workers in the City, than available jobs. This shortage of jobs is the driving force behind the commute time for Lompoc locals. While the majority, 58%, of workers are commuting less than 30 minutes, 42% of Lompoc locals are commuting more than 30 minutes. This includes the 13% that are commuting an hour or longer. The map below shows how commuting households are distributed throughout the City.



Commute More than One Hour

Inflow and Outflow of Jobs in Lompoc

The table and map below illustrate in inflow and outflow of jobs through the City. The table looks at those who are employed in the City and those who are residents of the City. Out of the 8,361 people who are employed inside the City of Lompoc, there is almost an equal number of employed people who living outside of the City (4,118) as those who live inside the City (4,243). On the other hand, more than seventy-five percent (75%) of Lompoc residents, or 13,927 people, leave the City to go to work.

Inflow/Outflow Job Counts (All Jobs) in 2017			
	Count	Share	
Employed in the Selection Area	8,361	100.0%	
Employed in the Selection Area but Living Outside	4,118	49.3%	
Employed and Living in the Selection Area	4,243	50.7%	
Living in the Selection Area	18,170	100.0%	
Living in the Selection Area but Employed Outside	13,927	76.6%	
Living and Employed in the Selection Area	4,243	23.4%	

Table 3 - Inflow/Outflow Job Counts, 2017 LEHD



Inflow/Outflow Job Counts

Education:

Educational Attainment by Employment Status (Population 16 and Older)

Educational Attainment	In Labo		
	Civilian Employed	Unemployed	Not in Labor Force
Less than high school graduate	2,630	734	1,832
High school graduate (includes equivalency)	3,767	538	2,060
Some college or Associate's degree	5,522	685	2,590
Bachelor's degree or higher	1,911	136	394

Table 10 - Educational Attainment by Employment Status

Data Source: 2014-2018 ACS

Educational Attainment by Employment Status

Educational attainment is one of the best indicators of future economic success, both in attaining a job and receiving a higher wage. In the City, the unemployment rate for a person without a high school diploma is 21.8% while the rate for a resident with a bachelor's degree or higher is 6.6%. The labor participation rate is also higher for those with higher educational attainment. Approximately 64.7% of residents without a high school diploma are in the workforce, which is lower than the workforce participation rate of 83.8% for those with bachelor's degrees.

Educational Attainment by Age

		Age				
	18-24 yrs	25-34 yrs	35-44 yrs	45-65 yrs	65+ yrs	
Less than 9th grade	68	434	730	1,542	619	
9th to 12th grade, no diploma	736	673	629	917	367	
High school graduate, GED, or alternative	1,266	2,236	1,580	2,370	1,294	
Some college, no degree	1,948	1,964	1,611	2,818	1,087	
Associate's degree	119	740	552	1,094	503	
Bachelor's degree	282	487	326	929	600	
Graduate or professional degree	7	261	150	322	393	

Table 11 - Educational Attainment by Age

Data Source: 2014-2018 ACS

Educational Attainment by Age

In general, higher education is associated with older age but not always. In Lompoc, more advanced degrees are generally more common in older populations. While only three percent (3%) of people have

a Graduate or professional degree, thirty-four percent (34%) of those are 65 years old or older. Fifty-eight percent of those with a Bachelor's degree are at least 45 years old or older.

Educational Attainment – Median Earnings in the Past 12 Months

Educational Attainment	Median Earnings in the Past 12 Months
Less than high school graduate	\$23,857
High school graduate (includes equivalency)	\$26,386
Some college or Associate's degree	\$34,412
Bachelor's degree	\$51,524
Graduate or professional degree	\$73,098

Table 12 - Median Earnings in the Past 12 Months

Data Source: 2014-2018 ACS

Median Earnings by Educational Attainment

The annual wage difference based on education can lead to substantial wealth differences over time. A person who graduates high school and works from the age 18 to 65 will earn approximately \$1,240,142in their lifetime. A person with a bachelor's degree who works from age 23 to 65 will earn \$2,164,008. That added wage earned does not take into account the benefits that are often associated with higher paying jobs, like health insurance and retirement accounts. The additional income can also be used to purchase a home instead of renting, which can increase wealth substantially.

In Lompoc, each educational attainment increases the median earnings quite substantially. A person with some college or an Associate's degree earns, on average, 49.7% less than someone with a Bachelor's degree. Further, those with a Graduate degree or professional degree earn 41.8% more, on average, than someone with a Bachelor's degree.

Based on the Business Activity table above, what are the major employment sectors within your jurisdiction?

Based on the Business Activity table above, the Arts, Entertainment, and Accommodations sector is the leading business sector within Lompoc. There are 2,093 jobs available in the sector and 2,371 workers available. This makes up 27% of the jobs and 14% of the workers. The second largest sector is Education and Health Care Services with 1,482 jobs and 3,653 available workers, or 19% of available jobs and 21% of workers within the City. The Other Services sector and Transportation & Warehousing sector both make up another 14% of jobs, or a combined 28%. However, these sectors, respectively, only have 5% and 3% of the share of workers within Lompoc. As previously mentioned, these are two of the three sectors where there are less workers than there are jobs available. The remaining sectors each provide 7% or less share of jobs in the City.

Describe the workforce and infrastructure needs of the business community:

According to the business activity table, there are much more workers than jobs in the City, however a few industries still have a noticeable need of workers. These industries are: Transportation and Warehousing and Wholesale Trade industries. Despite the need for workers in these fields, stakeholders report that many residents travel outside of the City to find employment.

Improving public infrastructure and facilities has remained a challenge and the City has prioritized public improvements in the Strategic Plan.

Describe any major changes that may have an economic impact, such as planned local or regional public or private sector investments or initiatives that have affected or may affect job and business growth opportunities during the planning period. Describe any needs for workforce development, business support or infrastructure these changes may create.

The Santa Barbara County Association of Governments (SBCAG) reports several projects that may have an impact on the economy of the region. According to the SBCAG report, "Federally Obligated Projects in Santa Barbara County Federal Fiscal Year 2019" there are 47 projects in five categories that are ongoing in the County. The majority of the funds fall into two categories: Bridge with 41% of funding and Transit Capital and Operations with 49% of funding. In total, these projects account for over \$26 million in funding in order to improve the infrastructure of the County, allowing for greater economic opportunities. In Lompoc, the City Council passed resolutions in 2017 allowing commercial cannabis activities within the City. Since the passage of these laws, the cannabis industry is growing rapidly in Lompoc. As of January 2020, the City has received 23 license applications for new businesses. In connection with the applications received are the following that will create jobs in Lompoc:

- 2 Labs
- 3 Processing Centers
- 10 Manufacturing Sites
- 10 Disbursement Sites
- 1 indoor cultivating Site

How do the skills and education of the current workforce correspond to employment opportunities in the jurisdiction?

According to the 2014-2018 ACS data in the Educational Attainment by Employment Status table, the labor participation rate is higher for those with higher educational attainment. Approximately 64.7% of residents without a high school diploma are in the workforce, which is lower than the workforce participation rate of 83.8% for those with bachelor's degrees.

Describe any current workforce training initiatives, including those supported by Workforce Investment Boards, community colleges and other organizations. Describe how these efforts will support the jurisdiction's Consolidated Plan.

The Santa Barbara County Workforce Development Board (WBD) works to develop "innovative workforce strategies that help businesses, individuals, and industries achieve and sustain economic vitality across all communities in Santa Barbara County region." The WBD oversees a number of programs to address this mission.

- Recruitment Services: Maintains a database of local job seekers to assist job providers in finding workers
- Rapid Response: Assists employers and workers who are facing a layoff or closure
- Workforce Training and Development: Partner training with vocational, educational, and technical institutions.

These services provide an opportunity for financial support from grant funds. Partnership with these organizations can allow for a more efficient use of resources and greater benefits for the community.

Does your jurisdiction participate in a Comprehensive Economic Development Strategy (CEDS)?

No.

If so, what economic development initiatives are you undertaking that may be coordinated with the Consolidated Plan? If not, describe other local/regional plans or initiatives that impact economic growth.

The City is currently not undertaking any major economic development initiatives, but continues to explore strategies for bolstering Lompoc's economy. MA-50 Needs and Market Analysis Discussion

Are there areas where households with multiple housing problems are concentrated? (Include a definition of "concentration")

HUD identifies four specific data points that constitute "housing problems": cost burden, overcrowding, lack of complete plumbing facilities and lack of complete kitchen facilities. In Lompoc, housing problems are rare except for being cost burdened. In order for an area to be concentrated it must include two or more housing problems that are substantially higher than the Citywide average. For this analysis, HUD's definition of "disproportionate" will be used to identify areas substantially higher: 10 percentage points higher than the jurisdiction as a whole.

Lack of Complete Plumbing Facilities: 1.28%

Lack of complete Kitchen Facilities: 1.64%

o Overcrowding: 12.8%

Cost Burden (Homeowners): 27.6%

o Cost Burden (Renters): 55.15%

For an area to be concentrated it must include two or more housing problems that are substantially higher than the Citywide average. In Lompoc that means the threshold for concentration is:

Lack of Complete Plumbing Facilities: 11.28%

Lack of complete Kitchen Facilities: 11.64%

o Overcrowding: 22.8%

Cost Burden (Homeowners): 37.6%

o Cost Burden (Renters): 65.15%

In Lompoc, there is one tract that shows a concentration of multiple housing problems. Tract 27.02 has substantially higher cost burden for both renters, as well as overcrowding. This tract is located in the southcentral portion of the City with W College Avenue to the north, NH Street to the east, W Ocean Avenue to the south, and NV Street to the west.

Are there any areas in the jurisdiction where racial or ethnic minorities or low-income families are concentrated? (Include a definition of "concentration")

For the purposes of this analysis a "racial or ethnic concentration" will be any census tract where a racial or ethnic minority group makes up 10 percent or more of the population than the City as a whole. According to the 2014-2018 American Community Survey 5-Year estimates the areas with racial or ethnic minority concentration are limited to the following in Lompoc:

Some Other Race:

o Citywide: 15.41%

o Concentration: 25.41%

Tract(s) with Racial Concentration: 27.02 (26.22%)

Hispanic

o Citywide: 56.25%

o Concentration: 66.25%

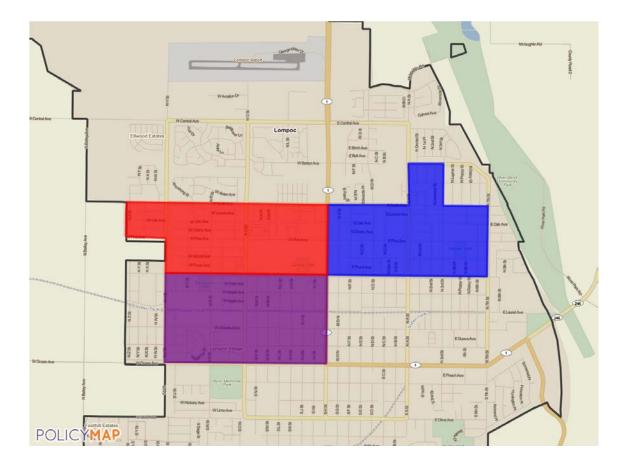
o Tract(s) with Ethnic Concentration: 27.02 (73.08%) and 27.06 (73.43%)

A "low-income concentration" is any census tract where the median household income for the tract is 80% or less than the median household income for the City of Lompoc. According to the 2014-2018 American Community Survey 5-Year Estimates, the Median Household Income in Lompoc is \$52,543. A tract is considered to have a low-income concentration if the MHI is \$42,543 or less. There are two tracts with a low-income concentration.

o Tract 27.05 - \$36,976

o Tract 27.02 - \$31,680

Census tract 27.02 is the only tract where both an ethnic concentration and low-income concentration overlap. This tract is located in the southcentral portion of the City with W College Avenue to the north, NH Street to the east, W Ocean Avenue to the south, and NV Street to the west. In the following map Blue tracts are those with a racial or ethnic concentration, red tracts have a concentration of LMI households, and the purple tract has both.



What are the characteristics of the market in these areas/neighborhoods?

In Lompoc, there is one Census tracts with low-income and cost burden concentration (27.02). Of those, housing problems do, generally, impact a household's quality of life, so the City should not ignore these challenges especially since they do exist together in a tract.

Are there any community assets in these areas/neighborhoods?

The neighborhood includes many churches from a wide variety of faiths. There are also several parks, the Lompoc City Airport-LPC, Lompoc Valley Medical Center, and multiple commercial areas near the community.

Are there other strategic opportunities in any of these areas?

This area has a number of major roads offering transportation options for residents. The relatively low cost of housing and rents may allow for grant funding to assist more households than elsewhere in the City. There are also a number of local businesses that could be partnered with for economic opportunities.

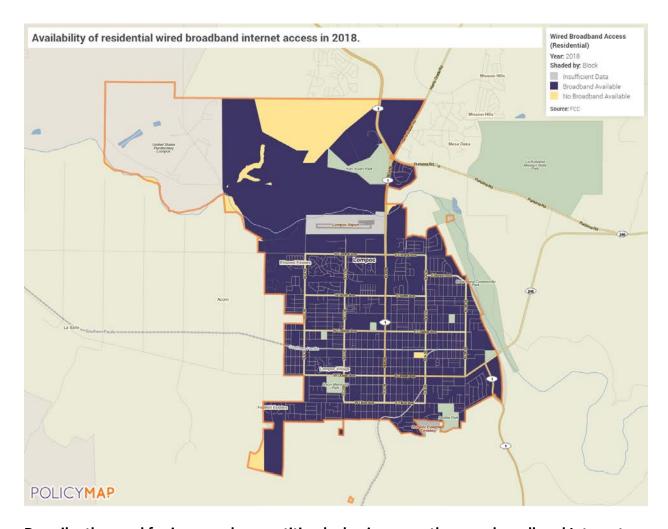
MA-60 Broadband Needs of Housing occupied by Low- and Moderate-Income Households - 91.210(a)(4), 91.310(a)(2)

Describe the need for broadband wiring and connections for households, including low- and moderate-income households and neighborhoods.

Internet is an essential communications and information platform that allows users to take advantage of the increased interconnectedness of business, education, commerce, and day to day utility. Reliable access to the internet is becoming a necessity to thrive in the modern economic environment. Communities that lack broadband access struggle to keep pace with the country. Locations without broadband access impedes its population's ability to take advantage of the educational and entrepreneurial opportunities available online. This is particularly problematic for LMI areas where economic opportunities are already often lacking. Studies suggest a strong correlation between increased high-speed internet access and increased education and employment opportunities, especially in small cities and rural areas.

Lompoc does not have significant gaps in broadband coverage. Broadband coverage is available in most of the residential areas of the City. However, very little of the City has multiple options of internet providers, to include LMI areas. The average Lompoc household has two (2) options for broadband-quality Internet service and may have to rely on low-grade wireless.

The following map shows broadband access throughout the City. Broadband access is defined as advertised internet speeds of 768 kilobits per second or higher. FCC data shows two major infrastructure options within Lompoc: cable and DSL.



Describe the need for increased competition by having more than one broadband Internet service provider serve the jurisdiction.

Once broadband access has been obtained, it is important to ensure there is competition among service providers. Any resource that has a de facto monopoly on an area may not be incentivized to provide standard and consistent services. Lompoc has a total of five (5) Internet providers offering residential service. Xfinity is the strongest provider in Lompoc so far as coverage. The average Lompoc household has one (1) option for broadband-quality Internet service. These providers frequently overlap around the city:

Xfinity (Cable)

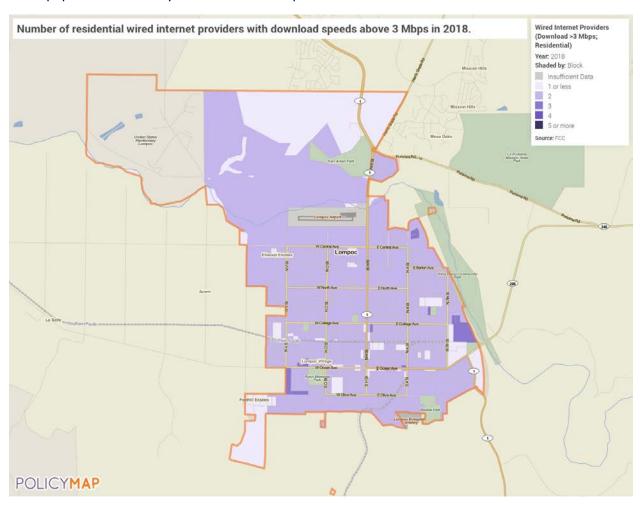
Frontier (DSL)

Viasat Internet (formerly Exede)(Satellite)

HughesNet (Satellite)

Verizon (Cable/Copper wire)

The following map shows the number of broadband service providers by census tract. Most of the City has one option of high-speed internet with competitive providers, though there are some tracts with lower populations that only have access to one provider.



MA-65 Hazard Mitigation - 91.210(a)(5), 91.310(a)(3)

Describe the jurisdiction's increased natural hazard risks associated with climate change.

Lompoc has historically been prone to various natural hazard events including earthquakes, flooding, hail, thunderstorm winds, and others. The potential impacts of climate change—including an increase in prolonged periods of excessively high temperatures, more heavy precipitation, more severe storms or droughts—are often most significant for vulnerable communities. The City is located near the coast and is impacted by primary effects. By the middle of the century the average summer temperature is expected to rise four degrees. This rise in temperature could lead to altered weather and precipitation patterns, a rise in severe storms, an increased risk of catastrophic floods, increased electricity costs, and ruined crops. Additionally, any increase in the ocean levels or increased storm activity will lead to people moving from the coast. These environmental changes may eventually lead people away from the coast. However, coastal populations have historically continued to see an increase in population from year to year. An increase of people may drive up housing costs, reduce the availability of jobs, and tax resources, while a decrease in population could cause labor shortages, decrease in competition for services, driving up costs and reducing quality, and reduced resources for locals. Coastal areas must continue to address their geographic challenges by anticipating, planning, and adapting to risks from flooding, sea level rise, and storm surge.

Describe the vulnerability to these risks of housing occupied by low- and moderate-income households based on an analysis of data, findings, and methods.

Low- and moderate-income residents are at particular risk due to having less available resources to combat the impacts of natural disasters. A dramatic rise in electricity or housing costs could put them at imminent risk of homelessness or living in substandard conditions. Residents in rural communities will have less access to public support in case of emergencies and will have fewer resources to repair or prevent damage to their homes.

The City of Lompoc strives to inform and prepare the general public for multi-hazard mitigation. There are online venues including the Lompoc Emergency Preparedness website, City social media pages, Santa Barbara County Emergency Management webpage, Ready Santa Barbara County website and Twitter page, and the Santa Barbara County VOAD website that disseminate numerous informational guidebooks, videos, and emergency resources to build disaster resiliency.

Strategic Plan

SP-05 Overview

Strategic Plan Overview

The City of Lompoc's five-year strategic plan in focused on the use of funds under certain housing and community development programs. Community Development Block Grant Program and the HOME Investment Partnership Program, as well as Community Development Block Grant Program Income, 1992 State HOME Program Income, and City Human Service Funds that come from donations by Lompoc City utility customers and City General Fund contribution are some of those funds. They provide for the development and support of programs, facilities, services and opportunities that best build a stable economic environment, maintain suitable living conditions, expand the supply of decent, affordable housing and enhance the overall quality of life for all Lompoc residents, particularly lower income families in need, youth, homeless, elderly, victims of domestic violence and disabled in the community.

SP-10 Geographic Priorities - 91.415, 91.215(a)(1)

Geographic Area

Table 13 - Geographic Priority Areas

1	Area Name:	Lompoc Citywide
	Area Type:	Local Target area
	Other Target Area Description:	
	HUD Approval Date:	
	% of Low/ Mod:	
	Revital Type:	Comprehensive
	·	Comprehensive
	Other Revital Description:	
	Identify the neighborhood boundaries	This area includes all properties within the
	for this target area.	incorporated area of Lompoc.
	Include specific housing and commercial characteristics of this target area.	
	How did your consultation and citizen participation process help you to identify this neighborhood as a target area?	
	Identify the needs in this target area.	Per the 2010 U.S. Census, 21.9% of the population in Lompoc are living in poverty compared to 23.5% statewide and 15.3% nationwide. The overall percentage of households that are below 80% of the median income in Lompoc is 49.7%. Nearly half of households in Lompoc are low and moderate income with incomes below 80% of the median income.
	What are the opportunities for improvement in this target area?	
	Are there barriers to improvement in this target area?	
2	Area Name:	Lompoc Low/Mod Census Tracts
	Area Type:	Local Target area
	Other Target Area Description:	
	HUD Approval Date:	

% of Low/ Mod:		
Revital Type:	Comprehensive	
Other Revital Description:		
Identify the neighborhood boundaries for this target area.	This target area consists of the following census tracts whose percentage of low/moderate income households are at least 51%. Based on the 2010 U.S. Census the following census tract and block groups are at least 51%: 2702.1, 2702.2, 2702.3, 2702.4, 2702.5, 2703.2, 2703.3, 2705.1, 2705.2, 2706.2, 2706.3, 2706.4, 2706.5, 2707.1, 2707.2, 2707.3, 2708.1, 2708.2, 2806.1.	
Include specific housing and commercial characteristics of this target area.		
How did your consultation and citizen participation process help you to identify this neighborhood as a target area?		
Identify the needs in this target area.		
What are the opportunities for improvement in this target area?		
Are there barriers to improvement in this target area?		

General Allocation Priorities

Describe the basis for allocating investments geographically within the state

The City of Lompoc primarily focuses its resources in the low-income census tracts of the City. Per the 2010 U.S. Census, 21.9% of the population in Lompoc are living in poverty compared to 23.5% statewide and 15.3% nationwide. The overall percentage of households that are below 80% of the median income in Lompoc is 49.7%. Nearly half of households in Lompoc are low- and moderate-income with incomes below 80% of the median income.

The census tracts identified as low/moderate census tracts are heavily impacted with high percentages of low-income populations. These areas have been identified as having higher incidence of crime, calls for emergency services, code violations and deteriorated, overcrowded housing conditions. Those conditions

are coupled with increase in population, unemployment and poverty create overwhelming needs in the community.

The public and non-profit, social service agencies continue to report increased needs for new facilities, facility expansions, renovations, and services, although there is a lack of funding sources for such improvements. The general public continues to express need for services, particularly for homeless, atrisk youth, elderly, victims of domestic violence, and low-income persons in the community.

Other problems identified by the community are inadequate household income, overcrowded housing conditions, lack of available affordable housing and lack of higher-paying jobs.

SP-25 Priority Needs - 91.415, 91.215(a)(2)

Priority Needs

Table 14 - Priority Needs Summary

Priority Need Name	Affordable Housing Opportunities			
Priority Level	High			
Population	Extremely Low Low Moderate Large Families Families with Children Elderly Public Housing Residents Chronic Homelessness Individuals Families with Children Mentally III veterans Persons with HIV/AIDS Victims of Domestic Violence Elderly			
Geographic Areas Affected	Lompoc Citywide			
Associated Goals	Residential Rehabilitation Program Emergency Repair Grants Homebuyer Assistance Assist Non-Homeless Special Needs Populations Administration			
Description	The City of Lompoc provides a variety of affordable housing resources including: • homeowner rehabilitation loans to low- and moderate-income homeowners • affordable rental property rehabilitation loans • security deposit assistance grants • homebuyer assistance loans and/or grants • emergency repair grants			

	Basis for Relative Priority	According to the 2013 Census American Community Survey 5-year Estimates, approximately 64.5% of the City's housing stock was built prior to 1970. Although regular maintenance can prolong the life of the older homes beyond 30 years, the passage of time will increase the cost and magnitude of needed housing repairs. Approximately 21% (3,040 units) of the City's housing unit stock was built prior to 1950.
2	Priority Need Name	Homeless & Non-Homeless Persons with Special Needs
	Priority Level	High
	Population	Extremely Low Low Moderate Large Families Families with Children Elderly Public Housing Residents Chronic Homelessness Individuals Families with Children Mentally III Chronic Substance Abuse veterans Persons with HIV/AIDS Victims of Domestic Violence Unaccompanied Youth Elderly Frail Elderly Persons with Mental Disabilities Persons with Physical Disabilities Persons with Developmental Disabilities Persons with Alcohol or Other Addictions Persons with HIV/AIDS and their Families Victims of Domestic Violence Non-housing Community Development
	Geographic Areas Affected	Lompoc Citywide
	Associated Goals	Assist Non-Homeless Special Needs Populations Assist Homeless and At-Risk of Homelessness Administration

	Description	Promote and provide services that assist homeless and non-homeless persons with special needs.
	Basis for Relative Priority	The City of Lompoc participated in the Countywide Point-in-Time count of homeless populations in the City of Lompoc on January 29, 2020. The "Point-in-Time" (PIT) Count is:
		 A physical count "snap shot" of the homeless people encountered county-wide during a pre-determined set of days, or "point in time";
		 Required every two years by U.S. Department of Housing & Urban Development (HUD); and
		Timeframe is determined by HUD.
		In Lompoc, 211 persons were surveyed, Countywide there were 1,897 persons encountered on the streets, shelters, hotels and living in cars or other places not meant for human habitation.
		Family Homelessness is a crisis in the County. Combined point-in-time data reported for the entire County reported:
		90 families were identified;
		185 children were identified;
3	Priority Need Name	Human Service Program for Low & Mod Income Persons
	Priority Level	High

Population	Extremely Low				
	Low				
	Moderate				
	Large Families				
	Families with Children				
	Elderly				
	Public Housing Residents				
	Chronic Homelessness				
	Individuals				
	Families with Children				
	Mentally III				
	Chronic Substance Abuse				
	veterans Persons with HIV/AIDS Victims of Domestic Violence Unaccompanied Youth				
	Elderly				
	Frail Elderly				
	Persons with Mental Disabilities				
	Persons with Physical Disabilities				
	Persons with Developmental Disabilities				
	Persons with Alcohol or Other Addictions				
	Persons with HIV/AIDS and their Families				
	Victims of Domestic Violence				
	Non-housing Community Development				
Geographic Areas Lompoc Citywide Affected					
Associated Goals	Assist Non-Homeless Special Needs Populations				
	Assist Homeless and At-Risk of Homelessness				
	Administration				

Description	Support public service activities for low- and moderate-income persons including:		
	youth serving programs		
	homeless service programs		
	mental health service programs		
	job training programs		
	child care programs		
	food distribution programs		
	senior services programs		
	substance abuse and treatment programs		
	family strengthening program		
	adult education programs		
	 violence prevention and intervention / victims advocacy programs 		
	veteran services programs		
Basis for Relative Priority	Needs Assessment Workshops and Needs Assessment Survey resulted in the following activities being identified as priorities in the community:		
	youth serving programs		
	homeless service programs		
	mental health service programs		
	job training programs		
	child care programs		
	food distribution programs		
	senior services programs		
	substance abuse and treatment programs		
	family strengthening program		
	adult education programs		
	 violence prevention and intervention / victims advocacy programs 		
	veteran services		
Priority Need Name	Public Improvements-Facilities/Parks/Infrastructure		

4	Priority Level	High
	Population	Extremely Low
		Low
		Moderate
		Large Families
		Families with Children
		Elderly
		Public Housing Residents
		Chronic Homelessness
		Individuals
		Families with Children
		Mentally III
		Chronic Substance Abuse
		Veterans
		Persons with HIV/AIDS
		Victims of Domestic Violence
		Unaccompanied Youth
		Elderly
		Frail Elderly
		Persons with Mental Disabilities
		Persons with Physical Disabilities
		Persons with Developmental Disabilities
		Persons with Alcohol or Other Addictions
		Persons with HIV/AIDS and their Families
		Victims of Domestic Violence
		Non-housing Community Development
Geographic Areas Affected Lompoc Citywide Lompoc Low/Mod Census Tracts		Lompoc Citywide
		Lompoc Low/Mod Census Tracts
	Associated Goals	Public Improvement / Parks / Infrastructure
		Assist Non-Homeless Special Needs Populations
		Administration

Description	Under the CDBG Program, funds may be used to undertake a variety of public facilities and public improvements that are publicly owned, or that are owned by a non-profit and open to the general public. Eligible activities include:		
	The acquisition, construction, reconstruction, rehabilitation, or installation of public facilities and improvements.		
	 Infrastructure improvements (construction or installation) including, but not limited to streets, curbs, and water and sewer lines. 		
	 Neighborhood facilities including, but not limited to public schools, libraries, recreational facilities, parks, and playgrounds. 		
	 Facilities for persons with special needs such as facilities for the homeless or domestic violence shelters, nursing homes, or group homes for the disabled. 		
Basis for Relative	During the 2020-21 - Needs Assessment Survey, Park Improvements,		
Priority	Public Facility Improvements, and Public Infrastructure were medium- high priorities for neighborhood improvement activities ranked as needs in the community by survey respondents.		

Narrative (Optional)

See discussion in tables above.

SP-35 Anticipated Resources - 91.420(b), 91.215(a)(4), 91.220(c)(1,2)

Introduction

This section discusses the resources that will be used to meet the goals of the 2020-2024 Consolidated Plan. Those resources are financial, involve partnership opportunities, and include ability to leverage additional funds.

The Department of Housing and Urban Development (HUD) notified CDBG Entitlement Communities of 2020-21 allocation amount February 20, 2020. The City of Lompoc CDBG grant amount for 2020-21 is \$529,165. Funding is allocated as follows and has been multiplied times 5 to estimate expected funding for the full five years of the plan in SP-45:

Program Administration \$ 105,833 (20% cap)

Human Services Program \$ 79,374 (15% cap)

CDBG Capital Projects \$343,958

In addition to FY 2020-21 CDBG funds, the City projects the following additional funding:

CDBG Program Income \$ 192,104 (estimated)

Human Service Donations \$ 14,000 (estimated)

The primary objective of the CDBG Program is the development of viable communities. This is achieved by providing the following, principally

for persons of low- and moderate-income:

- Decent housing
- A suitable living environment
- Expand economic opportunities

Additional funding criteria:

- CDBG funds may not replace any City or State-funded functions;
- Human service donations from Lompoc utility customers are restricted for human service activities and are not used for administrative costs;
- All funds must be used for activities that benefit low-income persons; and
- Expenditures that do not comply with HUD regulations must be paid back from the City's General Fund.

Anticipated Resources

Program	Source	Uses of Funds	Exped	ted Amoun	t Available Ye	ar 1	Expected	Narrative Description
	of Funds		Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$	Amount Available Reminder of ConPlan \$	
CDBG	public - federal	Acquisition Admin and Planning Economic Development Housing Public Improvements						Federal funds prioritized to address capital improvements of public facilities, fund public services to low- and moderate-income residents and improve affordable housing.
		Public Services	529,165	192,104	0	721,269	2,116,660	

Table 15 - Anticipated Resources

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

The City's federal fund allocations will complement a number of other resources that impact community development (e.g. capital improvement budgets, transportation funding, low-income housing tax credits, bank funding, community contributions, general funds and commercial lending funds). Through its competitive fund round for CDBG Human Service activity funding, the City seeks to use federal funds to leverage additional resources by encouraging applicants to pursue other funding and in-kind contributions from private and public sources to supplement City funding. City staff also provides technical assistance and professional expertise to grantees/subrecipients to increase capacity and efficiency among institutional delivery partners.

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

The City owns land and buildings that are used for public purpose. The City will continue to evaluate the best uses of City-owned property to meet community needs.

Discussion

See above.

SP-40 Institutional Delivery Structure - 91.415, 91.215(k)

Explain the institutional structure through which the jurisdiction will carry out its consolidated plan including private industry, non-profit organizations, and public institutions.

Responsible Entity	Responsible Entity Type	Role	Geographic Area Served
City of Lompoc	Government	Economic	Jurisdiction
		Development	
		Homelessness	
		Non-homeless special	
		needs	
		Ownership	
		Planning	
		Rental	
		neighborhood	
		improvements	
		public facilities	
		public services	
Lompoc Police	Government	public services	Jurisdiction
Department			
Lompoc Fire	Government	public services	Jurisdiction
Department			
City of Lompoc	Departments and	neighborhood	Jurisdiction
Recreation Division	agencies	improvements	
		public facilities	
		public services	
City of Lompoc Parks	Departments and	neighborhood	Jurisdiction
Division	agencies	improvements	
		public facilities	
		public services	
County of Santa Barbara	PHA	Ownership	Region
Housing and		Public Housing	
Community		Rental	
Development			
Department			

Responsible Entity	Responsible Entity Type	Role	Geographic Area Served
City of Lompoc	Government	Economic	Jurisdiction
Community		Development	
Development		Homelessness	
Department		Non-homeless special	
		needs	
		Ownership	
		Planning	
		Rental	
		neighborhood	
		improvements	
		public facilities	
		public services	
Central Coast	Non-profit	Homelessness	Region
Collaborative on	organizations	public services	
Homelessness			
Child Abuse Listening	Subrecipient	public services	Jurisdiction
Meditation (CALM)			
Community Action	Subrecipient	public services	Region
Commission			
Good Samaritan Shelter	Subrecipient	Homelessness	Jurisdiction
		Non-homeless special	
		needs	
		Rental	
		public services	
North County Rape	Subrecipient	public services	Jurisdiction
Crisis and Child			
Protection Center			
Transitions Mental	Subrecipient	Rental	Region
Health Association		public services	
Legal Aid Foundation of	Subrecipient	public services	Region
Santa Barbara County			
Catholic Charities	Subrecipient	public services	Jurisdiction
County of Santa Barbara	Government	public services	Region
Public Health Care			
Services			
Habitat for Humanity	Non-profit	Ownership	Region
Northern Santa Barbara	organizations		
County			

Responsible Entity	Responsible Entity Type	Role	Geographic Area Served
Housing Authority of	PHA	Public Housing	Region
Santa Barbara County		Rental	

Table 16 - Institutional Delivery Structure

Assess of Strengths and Gaps in the Institutional Delivery System

Stakeholders believe that the City has the right institutional structure in place to provide needed services. The greatest challenge in the City is declining funding to provide housing and services.

Availability of services targeted to homeless persons and persons with HIV and mainstream services

Homelessness Prevention	Available in the	Targeted to	Targeted to People
Services	Community	Homeless	with HIV
	Homelessness Prevent	ion Services	
Counseling/Advocacy	Χ	Χ	X
Legal Assistance	X	Х	
Mortgage Assistance	Χ		
Rental Assistance	Х	Х	
Utilities Assistance	X	Х	
	Street Outreach S	ervices	
Law Enforcement	X	Х	
Mobile Clinics	X	Х	
Other Street Outreach Services	X	Х	
	Supportive Serv	vices	
Alcohol & Drug Abuse	X	Х	Х
Child Care	X		
Education	X	Х	
Employment and Employment			
Training	X	Χ	
Healthcare	X	Х	Х
HIV/AIDS	X		Х
Life Skills	X	Х	
Mental Health Counseling	X	Х	X
Transportation	X	Х	Х
	Other		_

Table 17 - Homeless Prevention Services Summary

Describe how the service delivery system including, but not limited to, the services listed above meet the needs of homeless persons (particularly chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth).

In addition to being a member of the Santa Maria/Santa Barbara County CoC and being an active participant in C3H, the City's Community Development Division continues to work with the County contributing to the development of the Santa Barbara Countywide 10-Year Plan to End Chronic Homelessness (TYP), which outlines the countywide strategy to end homelessness. The TYP approach includes the following:

- Enhancing prevention efforts through early interventions and outreach to individuals in institutions.
- Reaching out to individuals on the streets and providing them with the services and treatment they need and want to support their transition from homelessness to permanent supportive housing.
- Developing enough supportive housing for every chronically homeless Lompoc resident to have a permanent home in a stable environment.
- Building a strong system of income reinforcing supports so that each chronically homeless person has enough income to subsist upon.
- Devising a financing plan that will fund the programs, staff, teams, and centers that will engage in this work.
- Creating an implementation structure to ensure that the Plan gains the political support, financing, and oversight it needs to succeed.

One of the key components of addressing the housing needs of Lompoc's homeless population is continuing to fund programs that provide shelter beds including Bridgehouse Emergency Shelter.

The City places high priority on assisting homeless residents with emergency and permanent housing resources, including funding for shelters and promoting projects that provide housing and services to those experiencing homelessness or at risk of homelessness.

The first component of the approach outlined in the TYP is "enhancing prevention efforts through early interventions and outreach to individuals in institutions." Prevention efforts focus on providing services to those at risk of homelessness, early intervention when they are in danger of losing their housing, and transition teams to help those being discharged from institutions access housing and services necessary to be successful.

Describe the strengths and gaps of the service delivery system for special needs population and persons experiencing homelessness, including, but not limited to, the services listed above

As noted above, stakeholders feel that the City has few service gaps and that decreased federal funding to serve residents with service needs is a bigger challenge than systemic gaps.

Provide a summary of the strategy for overcoming gaps in the institutional structure and service delivery system for carrying out a strategy to address priority needs

Continued funding of needed services and increased funding for supportive services as budget allows.

SP-45 Goals - 91.415, 91.215(a)(4)

Goals Summary Information

Sort	Goal Name	Start	End	Category	Geographic	Needs Addressed	Funding	Goal Outcome Indicator
Order		Year	Year		Area			
1	Public	2020	2024	Non-Housing Community	Lompoc	Public Improvements-	CDBG:	Public Facility or
	Improvement /			Development	Low/Mod	Facilities/Parks/Infrastructure		Infrastructure Activities
	Parks /				Census		\$	other than
	Infrastructure				Tracts		2,029,342	Low/Moderate Income
								Housing Benefit: 19160
								Persons Assisted
2	Emergency	2020	2024	Affordable Housing	Lompoc	Affordable Housing	CDBG:	Homeowner Housing
	Repair Grants				Citywide	Opportunities	\$312,500	Rehabilitated:
								50Household Housing
								Unit
3	Assist Homeless	2020	2024	Homeless	Lompoc	Homeless & Non-Homeless	CDBG:	Homeless Person
	and At-Risk of				Citywide	Persons with Special Needs	\$93,750	Overnight Shelter: 1000
	Homelessness							Persons Assisted
4	Assist Non-	2020	2024	Non-Homeless Special	Lompoc	Human Service Program for Low	CDBG:	Public service activities
	Homeless			Needs	Citywide	& Mod Income Persons	\$402,337	other than
	Special Needs							Low/Moderate Income
	Populations							Housing Benefit: 4375
								Persons Assisted

Table 18 – Goals Summary

Goal Descriptions

1	Goal Name	Public Improvement / Parks / Infrastructure
	Goal Description	Revitalize existing neighborhoods in low- and moderate-income areas by upgrading public facilities, such as parks and recreation facilities including ADA Improvements.
2	Goal Name	Emergency Repair Grants
	Goal Description	Emergency Repair Grants for seniors and other low-income households facilitating emergency repairs to the property and safeguarding against imminent danger to human life health, safety, and to protect the property from further structural damage due to natural disaster, fire, or structural collapse.
3	Goal Name	Assist Homeless and At-Risk of Homelessness
	Goal Description	This goal includes activities targeted to persons and families experiencing and at-risk of homelessness.
4	Goal Name	Assist Non-Homeless Special Needs Populations
	Goal Description	This goal consists of activities to help non-homeless persons with special needs access needed supportive services and facilities, as well as to provide affordable and accessible housing.

Estimate the number of extremely low-income, low-income, and moderate-income families to whom the jurisdiction will provide affordable housing as defined by HOME 91.315(b)(2)

The City of Lompoc is participating Jurisdiction of the County of Santa Barbara HOME Consortium. The City has allocated its portion of the total funding toward new construction in Lompoc: The Cypress and 7th Street Project, for affordable housing to assist in providing affordable housing for extremely low-, low- and moderate-income families and more specifically also persons who have suffered from homelessness and veterans.

SP-65 Lead-based Paint Hazards - 91.415, 91.215(i)

Actions to address LBP hazards and increase access to housing without LBP hazards

The City has complied and continues to comply with lead-based paint regulations since the enactment of Title X of the Housing and Community Development Act of 1992. The Act requires all State and local jurisdictions that receive funding from the Community Development Block Grant Program and HOME Program to adhere to the applicable federal lead-based paint regulations. Other organizations which receive funds are also required to adhere to these regulations.

How are the actions listed above integrated into housing policies and procedures?

Policies and procedures to ensure compliance include the following:

- Requiring Phase I environmental reports to include an analysis of lead-based paint if a project involves acquisition of pre-1978 residential structures.
- Rehabilitation projects that involve identified issues with lead-based paint are required to include mitigation activities in the work specification write-up.
- Educating the community on the dangers of lead poisoning (through distribution of brochures).
- The City also sends key staff to HUD-sponsored training sessions, which may include information about lead regulations.

SP-70 Anti-Poverty Strategy - 91.415, 91.215(j)

Jurisdiction Goals, Programs and Policies for reducing the number of Poverty-Level Families

The City will continue to help reduce the number of poverty-level families with assistance to shelter operations, supportive housing services, access to nutritional meals, case management, low to no cost child care services, health service programs, youth development programs and free legal aid and encourage economic development, job opportunity activities and occupational training programs.

How are the Jurisdiction poverty reducing goals, programs, and policies coordinated with this affordable housing plan

The City's anti-poverty efforts during the next five years will include the following:

- Support public services that assist persons with special needs.
- Support public service programs for low- and moderate-income households including programs for housing and other community development needs.
- Provide funding for operation of principal emergency shelters that serve Lompoc.
- Provide funding for essential services and programs that provide needed resources for homeless persons.
- Support programs that assist with basic necessities, such as food, clothing, healthcare and shelter.

SP-80 Monitoring - 91.230

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

Monitoring is an ongoing process and encompasses the evaluation of administrative, financial, program and project regulatory consistency, as well as agency capital review.

<u>Sub-recipient Agency & Activity Monitoring</u> consists of site visits to the location where the funded public service activity is conducted. Monitoring site visits are conducted during the month of October for agencies funded with Community Development Block Grant and Human Services Funds. In addition to Community Development Division staff attending, Human Services Commissioners strongly encouraged to attend the site visits as well. The site visit has two components, one is the agency's fiscal management, and the second is the program compliance with the Federal, State and local requirements as described in the Funding Agreement.

<u>Multi-Family Affordable Housing Monitoring</u> begins in the third quarter of each fiscal year typically, but depends of the release of the Department of Housing and Urban Development's (HUD) annual Income Limits. Notices of upcoming inspections are sent to Property Management Companies and Property Owners requesting rent rolls, occupancy summary reports and other documentation necessary to conduct the monitoring. Site inspections began shortly after where Community Development Division Staff select at random a minimum of twenty-five percent of the occupied units and all of the vacant units from the occupancy summary report to conduct HQS inspections on and notified the Property Manager and Property Owner a minimum of 72-hours in advance of the inspection date. If the results of the review of the vacant units or of the 25% of project units indicated there were repeated violations of housing quality standards, 100% of the units are inspected.

<u>Single-Family Affordable Housing Monitoring</u> consists of annual confirmation and verification of the owner-occupancy requirements described in the regulatory agreements recorded against Single Family homes either through Inclusionary policy requirements, Redevelopment Agency, Community Development Block Grant, HOME Investment Partnership or Lompoc Affordable Housing Trust Fund assistance provided to the developer or homeowner.

<u>Commercial Loan Monitoring</u> regulatory agreements have maintenance requirements. Typically, the regulatory agreement requires the borrower "Maintain the Property in a manner reasonably satisfactory to Agency."

When "Job Creation and/or Retention" is a component of the regulatory agreement, annual reports from the business owner with regards to the status of such job created or retained is required to be submitted.

Expected Resources

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

Introduction

This section discusses the resources that will be used to meet the goals of the 2020-2024 Consolidated Plan. Those resources are financial, involve partnership opportunities, and include ability to leverage additional funds.

The Department of Housing and Urban Development (HUD) notified CDBG Entitlement Communities of 2020-21 allocation amount February 20, 2020. The City of Lompoc CDBG grant amount for 2020-21 is \$529,165. Funding is allocated as follows:

Program Administration \$ 105,833 (20% cap)

Human Services Program \$ 79,374 (15% cap)

CDBG Capital Projects \$343,958

In addition to FY 2020-21 CDBG funds, the City projects the following additional funding:

CDBG Program Income \$ 192,104 (estimated)

Human Service Donations \$ 14,000 (estimated)

The primary objective of the CDBG Program is the development of viable communities. This is achieved by providing the following, principally

for persons of low- and moderate-income:

- Decent housing
- A suitable living environment
- Expand economic opportunities

Additional funding criteria:

- CDBG funds may not replace any City or State-funded functions;
- Human service donations from Lompoc utility customers are restricted for human service activities and are not used for administrative costs;
- All funds must be used for activities that benefit low-income persons; and
- Expenditures that do not comply with HUD regulations must be paid back from the City's General Fund.

Anticipated Resources

Program	Source of	Uses of Funds	Exped	ted Amoun	t Available Ye	ar 1	Expected	Narrative Description
	Funds		Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$	Amount Available Remainder of ConPlan \$	
CDBG	public - federal	Acquisition Admin and Planning Economic Development Housing Public Improvements Public Services	529,165	192,104	0	721,269		Federal funds prioritized to address capital improvements of public facilities, fund public services to low- and moderate-income residents, and improve affordable housing.

Table 19 - Expected Resources - Priority Table

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

The City's federal fund allocations will complement a number of other resources that impact community development (e.g., Capital Improvement Plan budgets, transportation funding, local, state, private and bank funding). The City seeks to use federal funds to leverage additional resources by encouraging applicants to pursue other funding and in-kind contributions from private and public sources to supplement City funding. The City also makes strategic investments to generate program income from CDBG annual allocations when feasible. Community Development Division staff also provides technical assistance and professional expertise to grantees/sub-recipients to increase capacity and efficiency among institutional delivery partners.

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

The City owns land and buildings that are used for public purposes. Examples include City-administered recreation facilities, which house non-

profit administered public services.

Discussion

See above.

Annual Goals and Objectives

AP-20 Annual Goals and Objectives

Goals Summary Information

Sort	Goal Name	Start	End	Category	Geographic	Needs Addressed	Funding	Goal Outcome Indicator
Order		Year	Year		Area			
1	Public	2020	2024	Non-Housing	Lompoc	Public Improvements-	CDBG:	Public Facility or
	Improvement /			Community	Low/Mod	Facilities/Parks/Infrastructure	\$559,552	Infrastructure Activities
	Parks /			Development	Census			other than Low/Moderate
	Infrastructure				Tracts			Income Housing Benefit:
								3832 Persons Assisted
2	Emergency Repair	2020	2024	Affordable	Lompoc	Affordable Housing	CDBG:	Homeowner Housing
	Grants			Housing	Low/Mod	Opportunities	\$62,500	Rehabilitated: 10
					Census			Household Housing Unit
					Tracts			
3	Assist Homeless	2020	2024	Homeless	Lompoc	Homeless & Non-Homeless	CDBG:	Homeless Person
	and At-Risk of				Citywide	Persons with Special Needs	\$18,750	Overnight Shelter: 200
	Homelessness							Persons Assisted
4	Assist Non-	2020	2024	Non-Homeless	Lompoc	Human Service Program for Low	CDBG:	Public service activities
	Homeless Special			Special Needs	Citywide	& Mod Income Persons	\$80,467	other than Low/Moderate
	Needs							Income Housing Benefit:
	Populations							875 Persons Assisted

Table 20 - Goals Summary

Goal Descriptions

1	Goal Name	Public Improvement / Parks / Infrastructure
	Goal Description	ADA Improvements to Public Park Facilities (Phase 4) in the total amount of \$447,642 (2020-21 CDBG Entitlement Grant Funds \$293,958 & 2019-20 CDBG Program Income of \$153,684) have been allocated to replace existing non-ADA compliant restroom facilities with ADA-compliant restroom facilities identified through the Phase I Feasibility Study and Conceptual Design which was funded with FY 2016-17 CDBG funds.
2	Goal Name	Emergency Repair Grants
	Goal Description	Catholic Charities operates the Mobile Home Emergency Repair Grant / Emergency Repair Grant (MERG/ERG) Program. The City has allocated \$50,000 of the 2020-21 CDBG Entitlement Grant Funds to this program. The program will provide Emergency Repair Grants for seniors and other low-income households facilitating emergency repairs to the property and safeguarding against imminent danger to human life health, safety, and to protect the property from further structural damage due to natural disaster, fire, or structural collapse.
3	Goal Name	Assist Homeless and At-Risk of Homelessness
	Goal Description	The City will utilized public service activity funding in the amount of \$15,000 (2020-21 CDBG Entitlement Grant Funds) for homeless service provider, Good Samaritan Shelter, to provide service to homeless individuals and families. The funding used by Good Samaritan will go toward their Emergency Shelter services at the Bridgehouse Shelter and will assist persons who are homeless and/or at-risk of homelessness in Lompoc.
4	Goal Name	Assist Non-Homeless Special Needs Populations
	Goal Description	Funding in the amount of \$75,000 (2020-21 CDBG Entitlement Grant Funds of \$64,374 and utility donations of \$10,626) has been allocated to 5 public service activities that assist non-homeless special needs populations as listed as follows: Child Abuse Listening Mediation, City of Lompoc Recreation Community Programs, Community Action Commission, North
		Rape Crisis and Child Protection Center and Transitional-Mental Health Association.

Projects

AP-35 Projects – 91.220(d)

Introduction

The following projects have been identified for funding through the annual process.

Projects

#	Project Name
1	Administration
2	Public Facilities
3	Housing
4	Human Services

Table 21 - Project Information

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

The greatest obstacle the City faces in meeting needs of the underserved in Lompoc is limited resources in comparison to the needs. Funding received from City utility customers annually, at an estimated \$14,000, is provided towards public service activities on an annual basis. That funding helps bridge the gap between the non-profit communities ask for human service funding (\$110,000) and the CDBG funding available for public service activities \$79,374.

AP-50 Geographic Distribution – 91.220(f)

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

The City spans 11.68 square miles with a population of 42,730.

The 2010 Census reported that the City's population is 61.2 percent White (not Hispanic), 50.8% of the population is represented by Hispanic or Latino, while the Black or African American population comprises 5.7% and Asian comprises 3.8%.

Census data confirms that the majority of the city is heavily impacted with high percentages of low-income persons (49.1%).

Unemployment and poverty have created overwhelming needs in the community. The public and non-profit, social service agencies continue to report increased needs for expansion of services although there is a lack of funding resources. The general public continues to express the need for services particularly for homeless, at-risk youth, disabled, elderly and low-income families in the community.

Geographic Distribution

Target Area	Percentage of Funds
Lompoc Citywide	100
Lompoc Low/Mod Census Tracts	100

Table 22 - Geographic Distribution

Rationale for the priorities for allocating investments geographically

All funding is invested in the City's low- to moderate- census tract areas. While some activities funded operate Citywide, their participants are low- to moderate- income clientele or presumed beneficiaries.

Discussion

See discussion above.

AP-85 Other Actions – 91.220(k)

Introduction:

This section reports additional efforts the City will undertake during the 2020-21 program year to address the residents' housing and community development needs.

Actions planned to address obstacles to meeting underserved needs

Despite the City's targeted use of federal and local resources to meet the underserved needs of the community, obstacles to meeting the need persist. The goals set forth in this plan position the City to continue its focus on meeting needs in the areas of rental housing, supportive services, accessibility, homelessness assistance, homeownership, community infrastructure, and access to community assets. The City will continue to allocate federal and local resources to meet these needs and work with partners to identify and address underserved needs.

Actions planned to foster and maintain affordable housing

The City is a member of the County HOME Consortium and will utilize local affordable housing trust funds to assist with affordable housing development, tenant based rental assistance and homebuyer assistance programs.

Actions planned to reduce lead-based paint hazards

The City will include lead testing and abatement procedure in all applicable rehabilitation activities and require an analysis of lead based paint it a project involves acquisition of pre-1978 housing. The City also provides educational brochures published by the Environmental Protection Agency to residents on the health hazard of lead-based paint.

Actions planned to reduce the number of poverty-level families

Proposed projects for the 2020-21 program year intended to help reduce the number of poverty-level families include assistance to shelter operations, supportive housing services, access to nutritional meals, case management, low to no cost child care services, health service programs, youth development programs and free legal aid. Specific projects are listed in AP-20 under Goal Descriptions.

Actions planned to develop institutional structure

The City will contribute to capacity building in the institutional structure to encourage coordination among service agencies, participating in cooperative efforts such as the CoC and Home for Good, and by providing technical assistance and guidance to grantees.

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

The City will promote and emphasize the need for coordination and collaboration between all agencies active in the City's programs, so as to minimize the duplication of efforts. The City will continue to participate in cooperative efforts such as the CoC and Home for Good. Efforts to enhance coordination between public and private sector will ensure that needs are being properly addressed and that resources are being maximized.

Discussion:

Please see above.

Program Specific Requirements

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

Introduction:

This section addresses the program-specific requirements of the Annual Action Plan. The Consolidated Plan Final Rule contains requirements regarding program-specific narratives in the Action Plan for CDBG and HOME.

The City of Lompoc has been allocated \$529,165 in CDBG funds for the 2020-21 Program Year, and prior year CDBG Program Income totaling \$192,104. The City will have Human Service Fund Donations from residents in the amount of \$14,000, to assist with public service activities funded through the Human Service Program.

Total funding including CDBG, CDBG Program Income, and Human Services Funds total \$735,269 will be used towards the primary objective of the CDBG program, which is the development of viable urban communities, by providing decent housing, and suitable living environments, which will benefit low- and moderate- income persons and households in Lompoc.

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

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

1. The total amount of program income that will have been received before the start of the	
next program year and that has not yet been reprogrammed	192,104
2. The amount of proceeds from section 108 loan guarantees that will be used during the	
year to address the priority needs and specific objectives identified in the grantee's	
strategic plan.	0
3. The amount of surplus funds from urban renewal settlements	0
4. The amount of any grant funds returned to the line of credit for which the planned use	
has not been included in a prior statement or plan	0
5. The amount of income from float-funded activities	0
Total Program Income:	192,104

Other CDBG Requirements

- 1. The amount of urgent need activities
- 2. The estimated percentage of CDBG funds that will be used for activities that benefit persons of low and moderate income. Overall Benefit A consecutive period of one, two, three, four or five years may be used to determine that a minimum overall benefit of 70% of CDBG funds is used to benefit persons of low and moderate income.

100.00%

See above.