
City of Montebello

Los Angeles County, California

2020-2021 Annual Action Plan Amendment

Draft November 2020

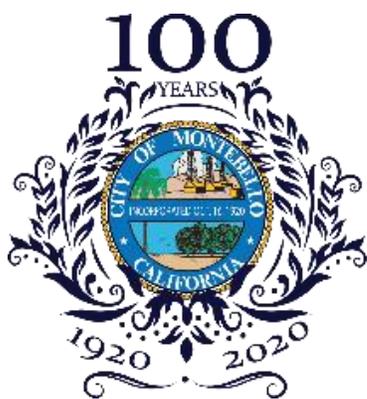


TABLE OF CONTENTS

2020 ANNUAL ACTION PLAN	2
AP-15 Expected Resources – 91.220(c)(1,2)	3
AP-20 Annual Goals and Objectives	6
AP-35 Projects – 91.220(d)	7
AP-38 Project Summary	8
AP-50 Geographic Distribution – 91.220(f)	15
Affordable Housing.....	16
AP-55 Affordable Housing – 91.220(g)	16
AP-60 Public Housing – 91.220(h)	20
AP-65 Homeless and Other Special Needs Activities – 91.220(i)	21
AP-75 Barriers to affordable housing – 91.220(j).....	25
AP-85 Other Actions – 91.220(k)	27
Program Specific Requirements.....	29
Appendix.....	31

2020-2021 Annual Action Plan

2020 ANNUAL ACTION PLAN

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

Introduction

Due to a nationwide calculation error, the City's Community Development Block Grant (CDBG) and HOME Investment Partnership Program (HOME) allocations were adjusted for Fiscal Year (FY) 2020-2021. The City also received additional CDBG-CV funding in response to the COVID-19 pandemic. The city anticipates utilizing the following resources during FY 2020-2021 to meet Consolidated Plan Goals:

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan: \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
CDBG	Public federal	Admin and Planning, Public Improvements, Public Services	\$665,245	\$493,785	\$400,411	\$1,559,441	\$2,611,384	The City expects to receive \$3,250,000 over the next 5 years CDBG entitlement funds; \$665,245 in Year 1. Any unencumbered funds from prior year (s) resources will be allocated to public facilities improvements.
HOME	Public federal	Acquisition Homeowner rehab Multifamily rental new and rehab TBRA	\$258,255	\$143,853	\$0	\$402,108	\$1,303,268	The City expects to receive \$1,500,000 over the next 5 years in HOME entitlement funds; \$258,255 in Year 1.
CDBG-CV	Public federal	Public Service	\$910,152	\$0	\$0	\$910,152	\$0	The city Expects to receive \$910,152 in CDBG-CV funds in response to COVID.

Table 52 - 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 will continue to use state and local funds to leverage federal entitlement dollars, including but not limited to:

- City General Funds (Affordable housing projects)
- Preserve the City's existing affordable housing stock for low- to moderate-income households (i.e. State CalHome Fund Owner-Occupied Rehabilitation Loan Program)

Montebello implements the goals, objectives, and policies of the AI and ConPlan by using funds to bolster public services that will lead to housing benefits for low-to-moderate income residents.

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 of Montebello is planning on using a portion of CDBG funds to update the functionality and improve the infrastructure of the City owned Senior Center and a City owned Fire Station in an LMI Census Tract area. The Montebello Senior Center provides recreational activities, meals, and other programs for seniors throughout the City.

Discussion

ANNUAL GOALS AND OBJECTIVES

AP-20 Annual Goals and Objectives

Goals Summary Information

1	Goal Name	Increase affordable housing opportunities.
	Goal Description	Provide funding for the development of new affordable housing, homebuyer assistance programs and or utility or rent reduction programs for low and moderate income families. Fund housing solutions that may include: programs that increase homeownership, housing improvements for special needs populations, support integrated housing solutions and plans, and reduce barriers to affordable housing consistent with the City's Analysis for Impediment to Fair Housing Choice.
2	Goal Name	Maintain decent and energy efficient housing stock.
	Goal Description	Provide funding for programs for owner-occupied housing rehabilitation including activities related to home improvements, energy efficiency, structural improvements, and/or other home sustainability projects.
3	Goal Name	Create sustainable neighborhoods.
	Goal Description	Activities that improve the quality of life for residents including improving parks, creating green streets, improving accessibility, water and sewer system improvements, and road reconstruction and pedestrian safety.
4	Goal Name	Expand fair housing choice and access.
	Goal Description	The City will continue to collaborate with entities that provide assistance for families and individuals seeking counseling and or legal solutions to fair housing, discrimination problems, and impacts due to the COVID-19 pandemic.
5	Goal Name	Provide vital public services.
	Goal Description	Provide needed public services that assist individuals and families in the following ways: crisis intervention, crime prevention, homeless prevention, services for at-risk families, shelter in-take services, senior and special needs services, nutrition and preventative health services, supplemental food/clothing/counseling and job search assistance to those who are homeless or at-risk of homelessness, and other vital social services including services in response to COVID-19 pandemic.
6	Goal Name	Increase the earning capacity for LMI families.
	Goal Description	Pursue opportunities that will connect LMI families with job training, career guidance, and part-time and full time work. The City also wishes to fund business recruitment, attraction and or expansion initiatives that generate jobs and respond to the impacts of the COVID-19 pandemic.
7	Goal Name	Expanding economic opportunities
	Goal Description	Needed infrastructure improvements.
8	Goal Name	Planning and administration
	Goal Description	Planning and Administration provides funds for program and project delivery, general operation and administration of CDBG and HOME funds as well as planning and support for CHDO.

Table 53 – Goals Summary

PROJECTS

AP-35 Projects –91.220(d)

Introduction

Projects

#	Project Name
1	Southern California Housing rights Center (HRC)
2	Section 108 Loan Payment
3	Public Facilities Improvements
4	Street Improvements
5	Montebello Senior Center Improvements
6	Planning and Administration CDBG
7	Housing Rehabilitation and Preservation Program (HRPP)
8	Acquisition and New Construction
9	Planning and Administration HOME
10	Montebello Community Assistance Program (MCAP)
11	Rental/Utility Assistance (MCAP)
12	Mortgage Relief Counseling (MCAP)
13	YMCA Montebello/Commerce
14	Mexican American Opportunity Foundation (MAOF)
15	Hearts of Compassion (HOC)
16	Senior Food Distribution (Parks and Rec)
17	Business Assistance - CCEDA
18	CDBG-CV Program Administration

Table 54 – Project Information

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

The City recognizes that special needs populations encounter challenges due to low income and the special conditions that they face. Special needs populations are more likely to become homeless because of these factors. Special needs populations require housing and supportive services. The City considers supportive services and housing for special needs populations a high priority. Supportive services are also considered a high priority in the CoC. In 2020-2021, the City will fund a new public service homeless program, improvement to public facilities and streets in eligible low-moderate areas.

In making project recommendations, consideration was given to a variety of thresholds that projects must meet to comply with CDBG objectives, including meeting one of the national objectives and addressing one of the community priorities set out in the Consolidated Plan. Staff also considered all engagement activities, housing and homeless data, established priority needs, cost reasonableness and effectiveness, activity management and implementation, experience with similar activities, past performance, leveraged funds, and completeness of the application. Project recommendations are for those projects determined most likely to be successful and maintain compliance with CDBG and HOME regulations.

AP-38 Project Summary

Project Summary Information

1	Project Name	Southern California Housing Rights Center (HRC)
	Target Area	Citywide
	Goals Supported	Expand fair housing choice and access
	Needs Addressed	Support land use policies further affordable and equitable housing opportunities
	Funding	CDBG (Admin): \$20,000
	Description	HRC will provide fair housing services, handle fair housing cases and education.
	Target Date	6/30/2021
	Estimate the number and type of families that will benefit from the proposed activities	100 households assisted. Two housing rights workshops provided.
	Location Description	3255 Wilshire Blvd. Los Angeles, CA
	Planned Activities	CDBG funds will be used to provide fair housing services to residents to prevent discrimination, provide referrals, investigations, case management, and litigation, and resolve landlord tenant disputes.
2	Project Name	Section 108 Loan Payment
	Target Area	Whittier Revitalization Area
	Goals Supported	Expanding economic opportunities
	Needs Addressed	needed infrastructure improvements
	Funding	CDBG: \$462,221
	Description	Completed improvements include the replacement of sidewalks, curbs and gutter, street irrigation, lighting, water and sewer lines, sidewalk improvements compliant with the Americans with Disabilities Act, landscaping, and street furniture.
	Target Date	6/30/2021
	Estimate the number and type of families that will benefit from the proposed activities	Loan repayment - not applicable
	Location Description	1600 West Beverly Blvd., Montebello, CA
Planned Activities	Section 108 Loan Payment	
3	Project Name	Public Facility Improvements
	Target Area	Citywide

	Goals Supported	Public facility infrastructure
	Needs Addressed	Construct or upgrade public facilities or infrastructure
	Funding	CDBG: \$465,084
	Description	Funds will be used to undertake facility improvements to City Fire Stations.
	Target Date	6/30/2021
	Estimate the number and type of families that will benefit from the proposed activities	500 people
	Location Description	1166 S. Greenwood Ave., Montebello, CA 600 N. Beverly Blvd., Montebello, CA 2950 W. Via Acosta, Montebello, CA
	Planned Activities	Update and improve fire stations.
4	Project Name	Street Improvements
	Target Area	Citywide
	Goals Supported	Create sustainable neighborhoods
	Needs Addressed	Infrastructure improvements
	Funding	CDBG: \$77,988
	Description	Street improvements including sidewalks, curbs, gutters, and street lighting.
	Target Date	6/30/2021
	Estimate the number and type of families that will benefit from the proposed activities	20 families/households
	Location Description	Citywide
	Planned Activities	Replacement of sidewalks, curbs, gutters, and street lighting
5	Project Name	Montebello Senior Center Improvements
	Target Area	Montebello Senior Center
	Goals Supported	Construct or upgrade public facilities or infrastructure
	Needs Addressed	Infrastructure improvements
	Funding	\$342,443
	Description	Funds will be used to undertake facility improvements.
	Target Date	6/30/2021
	Estimate the number and type of families that will benefit from the proposed activities	100 seniors
	Location Description	115 S. Taylor Ave., Montebello, CA
	Planned Activities	Update facility
6	Project Name	Program Administration CDBG

	Target Area	Citywide
	Goals Supported	Planning and Administration
	Needs Addressed	Planning and Administration
	Funding	CDBG: \$191,705
	Description	The City will continue to provide planning and administration services required to manage and operate the City's CDBG program. Such funds will assist in managing community development, housing, and economic development programs.
	Target Date	6/30/2021
	Estimate the number and type of families that will benefit from the proposed activities	Planning and Administration
	Location Description	1600 West Beverly Blvd., Montebello, CA
	Planned Activities	Program administration
7	Project Name	Housing Rehabilitation and Preservation Program (HRPP)
	Target Area	Citywide
	Goals Supported	Maintain decent and energy efficient housing stock
	Needs Addressed	Homeowner rehabilitation program
	Funding	HOME: \$100,000
	Description	Rehabilitation and preservation
	Target Date	6/30/2021
	Estimate the number and type of families that will benefit from the proposed activities	3 Families/households
	Location Description	Citywide
Planned Activities	Eligible home repairs	
8	Project Name	Acquisition & New Construction
	Target Area	Citywide
	Goals Supported	Increase affordable housing opportunities
	Needs Addressed	Affordable housing
	Funding	HOME: \$201,628
	Description	Acquisition/rehabilitation of property for low income housing
	Target Date	6/30/2021
	Estimate the number and type of families that will benefit from the proposed activities	NA
	Location Description	Citywide
Planned Activities	Acquisition/Rehabilitation for low income housing	

9	Project Name	Program Administration HOME
	Target Area	Citywide
	Goals Supported	Planning and Administration
	Needs Addressed	Planning and Administration
	Funding	HOME: 100,480
	Description	The City will continue to provide planning and administration services required to manage and operate the City's HOME program. Such funds will assist in managing community development, housing, and economic development programs.
	Target Date	6/30/2021
	Estimate the number and type of families that will benefit from the proposed activities	Planning and Administration
	Location Description	1600 West Beverly Blvd., Montebello, CA
	Planned Activities	Planning and Administration
10	Project Name	Montebello Community Assistance Program (MCAP)
	Target Area	Citywide
	Goals Supported	Provide vital public services
	Needs Addressed	Homeless prevention services and shelters
	Funding	CDBG-CV: \$313,122
	Description	Provide a variety of services for homeless persons and low income persons in the community.
	Target Date	6/30/2021
	Estimate the number and type of families that will benefit from the proposed activities	75-100 homeless persons
	Location Description	1600 West Beverly Blvd., Montebello, CA
	Planned Activities	The City will provide outreach services, motel vouchers, food, and showers for homeless persons in the community.
11	Project Name	Rental/Utility Assistance - MCAP
	Target Area	Citywide
	Goals Supported	Expand fair housing choice and access
	Needs Addressed	Allow tenants to pay bills and stay in their homes
	Funding	CDBG-CV: \$290,000
	Description	Provide rental and utility assistance to low/mode income residents

	Target Date	6/30/2021
	Estimate the number and type of families that will benefit from the proposed activities	80 households
	Location Description	1600 West Beverly Blvd., Montebello, CA
	Planned Activities	Provide rental and utility assistance
12	Project Name	Mortgage Relief Counseling - MCAP
	Target Area	Citywide
	Goals Supported	Expand fair housing choice and access
	Needs Addressed	Provide homeowners assistance with education on loans and programs
	Funding	CDBG-CV: \$20,000
	Description	Provide counseling and legal services for households in danger of foreclosure
	Target Date	6/30/2021
	Estimate the number and type of families that will benefit from the proposed activities	10 households
	Location Description	1600 West Beverly Blvd., Montebello, CA
	Planned Activities	Provide counseling and legal services for households in danger of foreclosure
13	Project Name	YMCA Montebello/Commerce
	Target Area	Citywide
	Goals Supported	Vital Public Service
	Needs Addressed	Emergency food assistance
	Funding	CDBG-CV: \$25,000
	Description	Food distribution
	Target Date	6/30/2021
	Estimate the number and type of families that will benefit from the proposed activities	100 persons with special needs
	Location Description	200 West Beverly Blvd, Montebello, CA
	Planned Activities	Food distribution
14	Project Name	Mexican American Opportunity Foundation (MAOF)
	Target Area	Citywide
	Goals Supported	Vital Public Service
	Needs Addressed	Emergency food assistance
	Funding	CDBG-CV: \$25,000
	Description	Food distribution
	Target Date	6/30/2021
	Estimate the number and type of families that will benefit from the proposed activities	100 persons with special needs
	Location Description	401 N. Garfield Avenue, Montebello, CA

	Planned Activities	Food distribution
15	Project Name	Hearts of Compassion (HOC)
	Target Area	Citywide
	Goals Supported	Vital Public Service
	Needs Addressed	Homeless/Special need populations
	Funding	CDBG-CV: \$25,000
	Description	Food distribution
	Target Date	6/30/2021
	Estimate the number and type of families that will benefit from the proposed activities	100 persons with special needs
	Location Description	600 South Maple Ave., Montebello, CA
	Planned Activities	Food distribution
16	Project Name	Senior Food Distribution(Parks & Rec)
	Target Area	Citywide
	Goals Supported	Vital Public Service
	Needs Addressed	Emergency food assistance
	Funding	CDBG-CV: \$10,000
	Description	Provide food to LMI seniors
	Target Date	6/30/2021
	Estimate the number and type of families that will benefit from the proposed activities	250 Seniors
	Location Description	1600 West Beverly Blvd., Montebello, CA
	Planned Activities	Food distribution
17	Project Name	Business Assistance - CCEDA
	Target Area	LMI Census Tract
	Goals Supported	Increase earning capacity for LMI families
	Needs Addressed	Technical assistance
	Funding	CDBG-CV: \$40,000
	Description	Business Recovery
	Target Date	6/30/2021
	Estimate the number and type of families that will benefit from the proposed activities	8 businesses in LMI Census Tract
	Location Description	LMI Census Tract
	Planned Activities	Business Recovery/Technical Assistance
18	Project Name	Program Administration CDBG-CV
	Target Area	Citywide
	Goals Supported	Planning and Administration
	Needs Addressed	Planning and Administration
	Funding	CDBG-CV: \$162,030

	Description	The City will continue to provide planning and administration services required to manage and operate the City's CDBG-CV program. Such funds will assist in managing activities in response to the COVID-19 pandemic.
	Target Date	6/30/2021
	Estimate the number and type of families that will benefit from the proposed activities	Planning and Administration
	Location Description	1600 West Beverly Blvd., Montebello, CA
	Planned Activities	Program administration costs for CDBG-CV operations.

Table 55 – Project Information

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 anticipates spending at least 70 percent of its entitlement funds in target areas, including areas that have low- and moderate-income concentrations or minority concentrations.

HUD's funded activities are limited to the city's low- and moderate-income areas, which encompass the majority of the city's residential areas. Areas of the city outside of the CDBG target areas will benefit from activities that are limited clientele in nature, i.e., a person/household can benefit from a federally assisted program provided they meet the program's eligibility criteria. Eligibility is typically established by household income and household size.

CDBG program funds will be expended based on program criteria. For example, public services are available on a citywide basis for qualified beneficiaries; fair housing and program administration activities will also be carried out on a citywide basis. Community development projects (e.g., street and park improvement projects) will be carried out in the city's low- and moderate- income areas, i.e., areas where most residents meet HUD's low- and moderate-income definition.

Geographic Distribution

Target Area	Percentage of Funds
Citywide	70%

Table 56 - Geographic Distribution

Rationale for the priorities for allocating investments geographically

The City generally does not allocate funds on a geographic basis. On an annual basis, the City prioritizes the use of its CDBG funding for citywide housing and community development activities including housing, public services, fair housing, and public facilities. Activities identified under the public services category and targeted to special needs populations are offered on a citywide basis and/or where resources can be coordinated with existing facilities or services. Public improvements and public facilities are qualified as benefitting low- and moderate-income persons.

Discussion

See above discussion.

AFFORDABLE HOUSING

AP-55 Affordable Housing – 91.220(g)

Introduction

One Year Goals for the Number of Households to be Supported	
Homeless	75-100
Non-Homeless	300
Special-Needs (youth)	
Total	375

Table 57 - One Year Goals for Affordable Housing by Support Requirement

One Year Goals for the Number of Households Supported Through	
Rental Assistance	80
The Production of New Units	0
Rehab of Existing Units	3
Acquisition of Existing Units	1
Total	84

Table 58 - One Year Goals for Affordable Housing by Support Type

Discussion

The City’s strategies relating to affordable housing efforts include maintaining the affordable housing stock through the Housing Rehabilitation and Preservation Program; acquisition of property for low income housing; and support for rental assistance programs through the County, such as the Section 8 Housing Choice Voucher. The City’s proposed homeless program (MCAP) is proposing providing rental and utility assistance to households affected by the COVID-19 pandemic. The City’s AI recommends amending portions of its zoning code that better supports affordable housing. The valued services help prevent homelessness and aim to assist at-risk youth and teenagers.

The City’s housing policies support a Rental Rehabilitation Program by providing loans to investor owned properties to assist in the ability to improve the City’s rental housing stock in need of rehabilitation, to provide safe, decent, and sanitary housing for lower income families. The City also puts funding toward the preservation of existing at-risk affordable housing for technical assistance to property owners and by monitoring Section 8 legislation. To facilitate the development of affordable units, the City uses the State’s density bonus law by offering a density bonus of between 20 and 35%.

Typically, the City uses its HOME funds for low income housing development and rehabilitation of owner-occupied single-family properties. The City must use the HOME affordable homeownership limits provided by HUD when setting price limits for affordable home sales and when using HOME funds for home rehabilitation. Also, the use of funds for HOME assisted activities requires that the value of the property after rehabilitation must not exceed 95% of the median purchase price for the area. The HOME Final Rule offers two options for determining the 95% of median purchase price limit for owner-occupied single-family housing, as noted below:

- (1) HUD will provide limits for affordable housing based on 95 percent of the median purchase price for the area; OR
- (2) Perform a local market survey to determine the 95 percent of median purchase price limit.

After review of the published 2019 HOME affordable homeownership limits provided by HUD, for Los Angeles County for determining 95 percent of the median purchase price limit, it was determined that the median price for Montebello homes is \$451,250. For a newly constructed unit, the limit is \$491,345. Based on FHA standard practice, the following multipliers are used for 2-, 3-, and 4-unit properties: 1.28, 1.55, and 1.92 times the 1-unit limit respectively. Based on a comparison of local housing market listing prices and sales information, it was determined that the FHA limits do not accurately reflect current actual home purchase prices for the area. Therefore, a local market survey was conducted for Montebello home sales for a three-month period using HdL data. This survey shows a median price of \$535,590 in the City of Montebello and a 95% median value price of \$508,810 (see home sales data table below).

FHA – Market Median Price	\$451,250
FHA – Market Median Price for newly constructed	\$491,000
Montebello Local Market Survey Median Price	\$535,590
95% of Montebello Local Market Survey Median Price	\$508,810

As a result of this conclusion, it is our recommendation that the City of Montebello use the local market survey price as the determinant of the 95 percent median purchase price limit as it is higher than the FHA-Market Median Price.

3-Month Home Sales Data, Montebello, CA			
December 2019 to February 2020			
#	Sale Date	Address	Price (median sales price)
1	2-18-2020	630 13 S Maple # 13 Ave	\$65,000
2	1/16/2020	8509 Beverly Blvd #87	\$105,000
3	1/17/2020	1620 Neil Armstrong St #209	\$230,000
4	12/27/2019	730 Frankel Ave Unit B1	\$310,000
5	2/21/2020	1661 Neil Armstrong St #253	\$338,000
6	2/21/2020	1791 Neil Armstrong St #206	\$355,000
7	12/18/2019	248 E Beverly Blvd Unit A	\$385,000
8	1/8/2020	203 Ridge Terrace Ln	\$385,000
9	12/11/2019	1635 Firvale Ave	\$390,000
10	12/27/2019	1701 Firvale Ave #58	\$390,000
11	2/19/2020	1610 Neil Armstrong St #104	\$395,000
12	2/3/2020	1133 Maxwell St	\$400,000
13	2/22/2020	1032 Carob Way #4	\$405,000
14	2/13/2020	336 N 1 st St	\$410,000
15	1/2/2020	1640 Neil Armstrong St #206	\$411,400
16	12/17/2019	1630 Neil Armstrong St #303	\$420,000
17	Not Listed	405 N Taylor Ave	\$450,000

18	12/27/2019	821 S 5 th St	\$485,000
19	12/23/2019	6700 Ferguson Dr	\$487,000
20	12/19/2019	416 Brady Ave	\$490,000
21	2/10/2020	1018 Roble Pl #6	\$490,000
22	2/12/2020	909 W Oakwood St #4	\$499,000
23	1/29/2020	909 W Oakwood St #2	\$499,000
24	2/3/2020	909 W Oakwood St #6	\$499,000
25	2/5/2020	909 W Oakwood St #3	\$499,000
26	2/6/2020	909 W Oakwood St #5	\$499,000
27	2/14/2020	909 W Oakwood St #7	\$499,000
28	1/23/2020	859 S Greenwood Ave	\$500,000
29	12/11/2019	605 Davis Ave	\$515,000
30	12/10/2019	4629 Grape St	\$520,000
31	12/13/2019	825 S 4 th St	\$520,000
32	Not Listed	716 Carmelita Pl	\$520,000
33	1/31/2020	2405 Findlay Ave	\$522,888
34	12/16/2019	392 S Gerhart Ave	\$524,000
35	1/13/2020	716 W Oakwood St	\$525,000
36	12/21/2019	348 S Pickering Way	\$530,000
37	1/21/2020	749 Via Del Oro St	\$530,000
38	Not Listed	796 W Fernfield Dr	\$530,000
39	1/28/2020	114 N 6 th St Unit B	\$530,000
40	1/17/2020	3005 Via Cerro	\$530,000
41	1/17/2020	709 Keenan St	\$535,000
42	1/23/2020	129 N 5 th St Unit E	\$535,590
43	1/13/2020	836 W Cleveland Ave	\$540,000
44	Not Listed	316 W Gleason St	\$548,000
45	1/9/2020	333 S Bluff Rd	\$553,000
46	1/22/2020	632 Carmelita Pl	\$560,000
47	2/10/2020	157 Ellingbrook Dr	\$570,000
48	2/5/2020	217 E Madison Ave	\$575,000
49	12/31/2019	5801 Repetto Ave	\$579,000
50	1/31/2020	125 N 5 th St Unit D	\$589,015
51	Not Listed	125 N 5 th St Unit A	\$589,500
52	Not Listed	540 N 7 th St	\$590,000
53	1/28/2020	506 N 18 th St	\$600,000
54	1/6/2020	620 Hendricks St	\$600,000
55	12/11/2019	2420 Foxglove Dr	\$600,000
56	2/14/2020	637 S Taylor Ave	\$625,000
57	Not Listed	1017 N 4 th St	\$630,000
58	1/10/2020	832 S 3 rd St	\$639,900
59	12/15/2019	448 E Los Amigos Ave	\$640,000
60	12/3/2019	816 E Avenida De La Merced	\$640,000
61	1/31/2020	620 N 4 th St	\$640,000
62	12/19/2019	1513 Masser Pl	\$645,000
63	12/6/2019	116 S 18 th St	\$655,000

64	12/5/2019	813 W Hughes Ave	\$660,000
65	1/31/2020	737 Agajanian Way	\$665,000
66	1/31/2020	113 N 21 st St	\$670,000
67	Not Listed	1008 W Madison Ave	\$683,500
68	1/28/2020	417 E Los Amigos Ave	\$690,000
69	12/11/2019	920 W Liberty Ave	\$715,000
70	12/30/2019	912 W Ashiya Rd	\$715,000
71	2/19/2020	1328 Carob Way	\$729,500
72	1/23/2020	1001 Rose Glen Ave	\$730,000
73	2/20/2020	203 Encanto Ln	\$730,000
74	2/3/2020	409 Taylor Ave	\$750,000
75	12/19/2019	1613 Appian Way	\$763,888
76	1/31/2020	2652 W Lincoln Ave	\$769,000
77	1/3/2020	716 Wilber Pl	\$770,000
78	12/10/2019	1521 Appian Way	\$815,000
79	1/17/2020	932 Lexington Ave	\$850,000
80	2/26/2020	252 S 7 th St	\$905,000
81	1/14/2020	113 S 10 th St	\$1,075,000
82	12/19/2019	2120 W Victoria Ave	\$1,200,000
83	12/30/2019	341 N 1 st St	\$2,150,000
84	Not Listed	2220 W Via Corona	\$2,400,000

AP-60 Public Housing – 91.220(h)

Introduction

The City of Montebello does not own or manage public housing.

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

The City of Montebello does not own or manage public housing.

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

LACDA offers the Family Self-Sufficiency Program to assist residents toward greater independence and homeownership opportunities.

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

LACDA is not designated as troubled.

Discussion

The City supports the efforts of LACDA in making rental assistance available to low-income households through the Section 8 program, but the City has no direct involvement in the ownership or management of public housing.

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

Introduction

To address the needs of homeless individuals and families, the City continues its efforts to identify efficient and effective means to distribute limited resources for homeless needs. The City has designated emergency and transitional housing as high priorities for addressing homelessness. Other efforts undertaken by the City are identified below:

1. Homeless Shelters

To accommodate its share of the region's homeless, the City utilized numerous nonprofit organizations to offer shelter and services to homeless persons. The City plans on establishing a homeless program to help the homeless population in the City with emergency motel and food vouchers. The City also participates in the Los Angeles County Continuum of Care Community Forum. The City works within this collaborative to help identify needs and gaps in the housing/service needs of the region's homeless.

2. Transitional and Supportive Housing

Supportive housing, as defined by Section 50675.14 of the California Health and Safety Code, is housing with no limit on the length of stay and that is occupied by a target population. The target population for supportive housing includes low-income persons having one or more disabilities. These disabilities may include mental illness, HIV or AIDS, substance abuse, or other chronic health conditions. Such housing is also linked to on-site or off-site services that assist residents in retaining their housing, improving their health status, and maximizing their ability to live and, when possible, work in the community. On- and off-site services may include, but are not limited to, tutoring, childcare, and career counseling.

Transitional housing, as defined by Section 50675.2 of the California Health and Safety Code, is housing configured as rental housing developments, which may include multifamily housing, single-family housing, or group homes. Such housing is operated under state or Federal program requirements that call for termination of assistance and recirculation of the housing unit to another eligible program recipient at some predetermined future point in time, which shall be no less than six months. Additional services that help individuals gain necessary life skills that support independent living are also allowed but not mandated.

State law allows a distinction in the permitting requirements for certain residential uses in single-family homes based on whether there are six or fewer, or seven or more, people served by the housing type. This size distinction currently exists in the City's Zoning Code for residential and group care facilities. Residential and group care facilities provide 24-hour per day residential living accommodations in exchange for the payment of money or other consideration, where the duration of tenancy is determined, in whole or in part, by the individual resident's participation in group or individual activities, such as counseling, recovery planning, or medical or therapeutic assistance. Residential or group care facilities include, but are not limited to, residential care facilities for persons with chronic, life-threatening illnesses, and alcoholism or drug abuse recovery or treatment facilities. Residential care facilities provide living accommodations for six or fewer persons and group care facilities provide living accommodations for seven or more persons.

This size distinction currently exists in the City's Zoning Code for residential and group care facilities. Residential and group care facilities provide 24-hour per day residential living accommodations in exchange for the payment of money or other consideration, where the duration of tenancy is determined, in whole or in part, by the individual resident's participation in group or individual activities, such as counseling, recovery planning, or medical or therapeutic assistance. Residential or group care facilities include, but are not limited to, residential care facilities for persons with chronic, life-threatening illnesses, and alcoholism or drug abuse recovery or treatment facilities. Residential care facilities provide living accommodations for six or fewer persons and group care facilities provide living accommodations for seven or more persons.

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

The City plans on establishing a homeless outreach program to help the homeless population in the City with emergency motel vouchers. The City of Montebello also contracts with local service providers to assist in reducing homelessness.

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

Los Angeles County is divided into eight Service Planning Areas (SPAs), 1 through 8. The division of the County makes it easier for the Department of Public Health to target and track the needs of each area. Montebello is located in SPA 7.

Every year, the Los Angeles Continuum of Care coordinates a Shelter/Housing Inventory Count (HIC), which is a point-in-time (PIT) inventory of service projects, and a record of utilization of services. HIC records how many beds and units are dedicated to serving people experiencing homelessness (e.g., emergency shelter, transitional housing, and safe haven) or people who have experienced homelessness and are now in permanent housing. The homeless count for the City of Montebello in 2020 was 170 unsheltered and 0 sheltered. The City will fund projects within the City in the 2020-2021 program year.

The CoC offers housing and supportive services to address the needs of homeless persons. Within SPA 7:

Emergency Shelter:

- 541 beds serving individuals and families with children

Transitional Housing

- 615 beds serving individuals with families with children
Permanent

Supportive housing

- 615 beds serving individuals with families with children

For the 2021-2021 program year, the City will allocate CDBG-CV fund to the help establish the Montebello Community Assistance Program (MCAP) which will outreach and engage the City's homeless population to support with emergency motel vouchers, PPE's, and hygiene kits. The City will also be a participant of the region's CoC.

Several programs, detailed below, offered in SPA 7 target different homeless client groups. The program presented below focuses on assessing the individual needs of homeless persons:

Coordinated Entry System (CES) – The CES is a framework that unites regional providers working collaboratively to house chronically homeless individuals. Using a common assessment tool, individuals are prioritized into the most appropriate housing based on their needs. The CES also coordinates County and Federal resources from agencies such as the Department of Mental Health, the Department of Health Services, housing authorities, and the U.S. Department of Veterans Affairs.

Addressing the emergency shelter and transitional housing needs of homeless persons

SPA 7 offers a variety of homeless housing facilities serving different client groups, and includes emergency shelters, transitional housing and permanent supportive housing (See above information).

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

The City has the goal of assisting homeless persons, especially chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth, make the transition to permanent housing and independent living include shortening the period of time that individuals and families experience homelessness, facilitating access for homeless individuals and families to affordable housing units, and preventing individuals and families who were recently homeless from becoming homeless again.

Homeless Family Solutions System – This program is a network of family homeless service providers that address the needs of homeless families or those at imminent risk of losing their housing. It works cooperatively with system partners to help families complete housing and service plans.

First 5 LA Supportive Housing Program (First 5 LA) – This program is a needs-based assistance program aimed at serving homeless or at-risk families with children from birth to age 5, some with current or past involvement with the County Department of Children and Family Services.

Supportive Services for Veteran Families (SSVF) – This program is a community-based, competitive grant program that rapidly rehuses homeless veteran families and prevents homelessness for those at imminent risk due to a housing crisis. The program’s objective is to achieve housing stability through a short-term, focused intervention. The SSVF employs a housing-first model, which focuses on helping individuals and families access and sustain permanent rental housing as quickly as possible and without precondition, while facilitating access to those services that will help the veteran’s family keep their housing.

HUD-VASH Vouchers (VASH) – The HUD-VASH program combines Housing Choice Voucher rental assistance for homeless veterans with case management and clinical services provided by the US Department of Veterans Affairs. The department provides these services for participating veterans at Veterans Affairs medical centers and community-based outreach clinics.

Unaccompanied Youth – Several programs serve this target group, including 1736 Family Crisis Center, Hathaway-Sycamores: Independent Living Program, Divinity Prophet: Independent Living Program, and Richstone Family Center: Transitional Housing Program and Transitional Living.

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

Agencies involved with persons discharged from institutions and systems of care, including the Los Angeles County Department of Children and Family Services, Department of Health Services, Department of Mental Health, and Los Angeles County Sheriff's Department, all have requirements stipulated by state law or county regulations requiring effective discharge planning and a specific transition plan to ensure that individuals and families are not discharged into homelessness.

In addition, the City of Montebello is planning on establishing a homeless outreach program known as MCAP. The program will focus on engaging the City's homeless population to support with emergency motel vouchers, PPE's, and hygiene kits, as well as help with accessing social service needs.

Discussion

The programs identified above, which address the needs of homeless persons and subpopulations of homeless, indicate that serving the homeless is a complex issue requiring a network of agencies, departments, and nonprofit community services agencies. It is fortunate that the City can utilize this network of agencies to provide housing and supportive services in addition to using limited CDBG funding.

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

Introduction:

City staff, stakeholders and the community at-large identified and prioritized fair housing issues and contributing factors to fair housing. Barriers to affordable housing as well as other housing information can be found in the City's draft 2020-2025 AI. A summary of the high priority barriers to affordable housing include:

- High cost of housing
- Housing values are increasing faster than household incomes
- Low number of affordable homes vs. market rate or higher cost homes
- Low number of housing opportunities for larger families
- Low ability to become a homeowner
- Lack of household financial stability
- Lack of funds to subsidize economic development projects
- Undereducated residents
- Aging housing and infrastructure
- Homeless prevention services
- Current land use policies do not support the development of affordable housing

Actions it planned to remove or ameliorate the negative effects of public policies that serve as barriers to affordable housing such as land use controls, tax policies affecting land, zoning ordinances, building codes, fees and charges, growth limitations, and policies affecting the return on residential investment

The AI provided goals and action steps developed as a result of specific data captured and existing programs and policies. Agency consultation, community outreach activities data review and analysis process were needed to develop the plan's goals and associated action steps. (Refer to the AI, Table):

Goal 1: Increase affordable housing opportunities.

Goal 2: Increase home ownership.

Goal 3: Create public awareness of fair housing laws and affordable housing advocacy.

Goal 4: Increase training, education and employment opportunities.

Table 47 in the AI presents the Goals and Action Steps, if put in place could further fair housing and affordable housing. As part of the engagement process, ideas and recommended action steps were documented to help provide clearer direction for Council, City staff and partnering agencies.

In the 2020-2021 AAP, the projects and programs that reduce the barriers to affordable housing include:

- Acquisition for Affordable Housing, Housing Rehabilitation Grants/Loans
- Montebello Community Assistance Program (MCAP)
- Fair Housing (HRC):
- Rental//Utility Assistance Program
- Mortgage Relief Counseling

To remove or ameliorate the barriers to affordable housing, the City has adopted the following goals in the 2016–2021 Housing Element:

- To minimize governmental constraints, market constraints, and environmental constraints that may impede the development of new housing;
- To ensure that fair and equal housing laws are enforced;
- To address future housing needs by expanding housing opportunities in the City;
- To increase the supply of affordable housing stock through new housing construction and the conservation of existing housing stock; and,
- To review the development standards for residential development as a means to improve site design, architectural quality, and the livability of multi-family housing for all segments of the community.

Discussion:

AP-85 Other Actions – 91.220(k)

Introduction:

One of the primary constraints to meeting the needs of low-income residents is a lack of funding to fully address all the needs. Economic challenges and cuts in grant funding have resulted in budgetary constraints not only with the City but with nonprofit service providers as well.

Actions planned to address obstacles to meeting underserved needs

The City of Montebello recognizes that special needs populations encounter challenges due to low income and the special conditions that they face. Special needs populations are more likely to become homeless as a result of these challenges. Special needs populations require housing and supportive services. The City considers supportive services and housing for special needs populations a high priority. Supportive services are also considered a high priority in the Continuum of Care. In 2020-2021, the City will fund a new public service that will aid with housing and supportive services. The City also plans on funding multiple non-profit agencies throughout Montebello to address the needs of households affected by the COVID-19 pandemic.

Actions planned to foster and maintain affordable housing

The City's strategies relating to CDBG-funded affordable housing efforts include maintaining the affordable housing stock through the Housing Rehabilitation and Preservation Program; maintaining rental assistance programs such as the Section 8 Housing Voucher program; and providing assistance to households before they lose their housing. The City will utilize a combination of Federal and non-Federal funds to maintain existing affordable housing units and foster the creation of new affordable housing opportunities. The City is proposing providing rental, utility, and mortgage relief counseling through the MCAP program.

Actions planned to reduce lead-based paint hazards

The City's HOME-funded Housing Rehabilitation and Preservation Program follows the requirements of Lead Safe Housing Regulation 24 CFR Part 35 effective September 15, 2000, and the subsequent September 2000 HUD transition assistance policy. The City will use, when required, state of California-certified lead-based paint inspectors/risk assessors to test for lead paint and perform risk assessments on houses testing positive, and certified lead-based paint contractors to remove and/or abate lead paint.

Actions planned to reduce the number of poverty-level families

The City of Montebello continues to look for ways to expand economic activities to include all people and provide programs to those people who are less fortunate. The City has focused on the creation of jobs for low- and moderate-income persons through capital improvement projects, Section 108 loan funds. Programs related to housing improvement, homeless shelters, supporting the County's rental assistance program, and funding affordable housing creation have resulted in housing the homeless and improving the living conditions of the elderly and low-income families.

Many factors can contribute to persons living at or below the poverty level. Lack of higher education opportunities, lack of marketable skills, unemployment or underemployment, lack of affordable childcare, lack of effective transportation, and lack of affordable housing all contribute to homelessness or persons

living in poverty. These factors must be addressed to reduce the number of persons living in poverty. While the City has no control over most of these factors, the City regularly provides referrals to those living below the poverty line. The City also provides a listing of public services agencies and homeless resources, and links to social service agencies. In addition, the City supports other government agencies, private developers, and nonprofit agencies that are involved in creating affordable housing and economic opportunities for low- and moderate-income residents.

The City is also proposing allocating funds to a Business Assistance program that will provide technical assistance to LMI Census Tract businesses in the City of Montebello.

Actions planned to develop institutional structure

CDBG funds received by the City are administered by the Finance Department. The City relies on a number of governmental departments and agencies, for-profit developers, and private, nonprofit organizations to carry out homelessness programs, affordable housing projects, seniors, at-risk youth, and other community development programs.

- The City's Planning and Community Development Department's functions directly impact and facilitate the development of housing.
- The Public Works Department is responsible for the design, construction, maintenance, and operation of public facilities as well as for administering infrastructure projects.
- LACDA administers the HUD Section 8 Housing Choice Voucher Program and public housing, which benefits the city's low-income population with publicly assisted rental housing.
- The City will provide emergency motel vouchers and services to the homeless population and to low- and moderate-income households.
- Housing developers are an important partner and essential for the development of market-rate and affordable housing. Private developers are unable to build affordable units without government or other subsidies because of the high cost of land in the city.

Gaps or weaknesses in the institutional structure may exist including: the loss of a redevelopment program is a significant challenge to fund future affordable housing projects. The primary funding source for affordable housing and its administrative costs is HOME. Also, CDBG funding reductions over the years has reduced funding that went to other community development programs. Essentially, these cutbacks resulted in staff and budgets reductions.

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

The City's Planning and Community Development Department maintains primary management and coordination of the various organizations involved in these processes. The staff within the Department works closely with other City departments and the community to develop programs and activities that improve low-and-moderate-income neighborhoods throughout Montebello. The administration of the program activities includes housing, public facility and infrastructure improvements, public and social service activities, and economic development activities. The City collaborates with public agencies, for-profit agencies, and non-profit organizations in order to provide the aforementioned programming and services.

Discussion:

PROGRAM SPECIFIC REQUIREMENTS

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

Introduction:

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	\$493,785
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.	\$400,411
5. The amount of income from float-funded activities	\$0
Total Program Income	\$894,196

Other CDBG Requirements

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

**HOME Investment Partnership Program (HOME)
Reference 24 CFR 91.220(I)(2)**

1. A description of other forms of investment being used beyond those identified in Section 92.205 is as follows:

The City does not receive any atypical loans, grant instruments, nonconforming loan guarantees, or other forms of investments.

2. A description of the guidelines that will be used for resale or recapture of HOME funds when used for homebuyer activities as required in 92.254, is as follows:

The City has general recapture and resale provisions in its HOME program guidelines which apply only to CHDOs. The City will impose HOME recapture provisions on any property sold by a CHDO to a homebuyer when the City provides a direct subsidy for down payment and or closing costs to the homebuyer.

3. A description of the guidelines for resale or recapture that ensures the affordability of units acquired with HOME funds? See 24 CFR 92.254(a)(4) are as follows:

In instances where the homebuyer's home is sold to a qualified low-income buyer at an affordable price, the HOME loan balance shall be transferred to the subsequent qualified buyer and the affordability period shall remain in force. The resale provision shall remain in force from that date the legal documents are executed at loan closing until the expiration of the affordability period.

4. Plans for using HOME funds to refinance existing debt secured by multifamily housing that is rehabilitated with HOME funds along with a description of the refinancing guidelines required that will be used under 24 CFR 92.206(b), are as follows:

The City has no current plans to use HOME funds to refinance existing debt secured by multifamily housing that is rehabilitated with HOME funds.

Discussion

The City relies on its HOME Policies and Procedures Manual to follow compliance requirements of the HOME program.

APPENDIX

Appendix A - Public Notifications

**CALIFORNIA NEWSPAPER SERVICE BUREAU
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CITY OF MONTEBELLO/CITY CLERK
1600 W. BEVERLY BLVD
MONTEBELLO, CA 90640

COPY OF NOTICE

Notice Type: HRG NOTICE OF HEARING
Ad Description
NOTICE OF PUBLIC HEARING DECEMBER 16 2020

To the right is a copy of the notice you sent to us for publication in the MONTEBELLO NEWS. Please read this notice carefully and call us with any corrections. The Proof of Publication will be filed with the County Clerk, if required, and mailed to you after the last date below. Publication date(s) for this notice is (are):

11/19/2020

The charge(s) for this order is as follows. An invoice will be sent after the last date of publication. If you prepaid this order in full, you will not receive an invoice.

Publication	\$515.00
Total	\$515.00

EWA# 3416596

**NOTICE OF PUBLIC HEARING
CITY OF MONTEBELLO CITY COUNCIL**

**NOTICE REGARDING SUBMISSION OF THE
2019-2020 CONSOLIDATED ANNUAL
PERFORMANCE AND EVALUATION REPORT
AND CONSIDER SUBSTANTIAL AMENDMENT
OF THE FISCAL YEAR 2020-2021 ANNUAL
ACTION PLAN**

NOTICE IS HEREBY GIVEN that the City Council of the City of Montebello ("City") will conduct a public hearing and public comment period regarding the approval and submission of the City's 2019-2020 draft Consolidated Annual Performance And Evaluation Report (CAPER) and consider a Substantial Amendment of the Fiscal Year (FY) 2020-2021 Annual Action Plan.

It is noticed that from November 30, 2020 to December 16, 2020 the draft CAPER and draft Substantial Amendment of the FY 2020-2021 Annual Action Plan may be reviewed at the following locations:

Montebello City Hall – Lobby
1600 W. Beverly Blvd.
Montebello, CA 90640

City of Montebello Website – Homepage
<https://www.CityOfMontebello.com>

PUBLIC HEARING INFORMATION:

Date: Wednesday, December 16, 2020

Time: 6:30 p.m. or as soon thereafter as the matter may be heard

Place: City Hall Council Chambers, 1600 W. Beverly Blvd., Montebello, CA 90640

PROJECT DESCRIPTION: The City of Montebello is a recipient of Community Development Block Grant (CDBG) and Home Investment Partnership Program (HOME) funds. These funds are awarded to the City by the U.S. Department of Housing and Urban Development (HUD). In order for the City to receive these funds, the City is required to prepare a Five Year Consolidated Plan as well as an Annual Action Plan outlining the planned use of CDBG and HOME funds. At the conclusion of the fiscal year, the City must prepare a year-end performance report known as the CAPER. The 2019-2020 CAPER covers the period of July 1, 2019 through June 30, 2020, and provides a summary of activities undertaken within CDBG and HOME funds during the report period.

The City also received additional Community Development Block Grant Coronavirus (CDBG-CV) funds, referred to as CDBG-CV3. HUD requires the City to prepare a Substantial Amendment to the current Annual Action Plan before the City may access CDBG-CV3 funds.

Public Review and Comment Period: The draft CAPER and the FY 2020-2021 Substantial Amendment will be available for public review and comment beginning on November 30, 2020 and ending on December 16, 2020. This document will be available for public review on the City of Montebello's website at [Error! Hyperlink reference not valid.](#) During the comment period, comments and/or questions may be submitted to:

Planning and Community Development Department



Attn: Aknesa Ananikyan, Senior Management Analyst
1600 W. Beverly Boulevard, Montebello, CA 90640
Office telephone: (323) 887-1200 ext. 402
Monday through Thursday, 7:30 A.M. to 5:30 P.M.

GENERAL INFORMATION: As authorized by the Governor's Executive Order No. N- 29-20, those interested in making public comments at the City Council meeting, may call on Wednesday, December 16, 2020 between 9:00 a.m. – 3:00 p.m. at (323) 887-1437. Staff will complete public comment cards in the order received. The public will be called during the City Council meeting. The exact call back time is not predictable due to the nature of the City Council agenda. As a result, you must be available until the end of the meeting to receive a live call from staff during the meeting. In addition, the City has created the following email address where the public can submit public comments from 4:30 p.m. – 5:30 p.m. on Wednesday, December 16, 2020: ccpubliccomment@cityofmontebello.com. These questions will be read out loud and submitted for the record. Written comments may also be mailed or delivered to the City Clerk's office address identified below. If you challenge the matter in court, you may be limited to raising those issues you or someone else raised at the public hearing, or in written correspondence delivered to the City of Montebello at, or prior to, the public hearing. This notice is provided in accordance with Government Code Sections 65867, 65090 and 65091. Public comments or questions about the subject matter may be submitted to the City Clerk's Office by mail, at 1600 W. Beverly Blvd., City of Montebello, or email at: lguzman@cityofmontebello.com. All communications to the City Clerk or the City Council regarding this matter are public records and will become part of the City's files and records.

11/19/20

EWA-3416596#

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