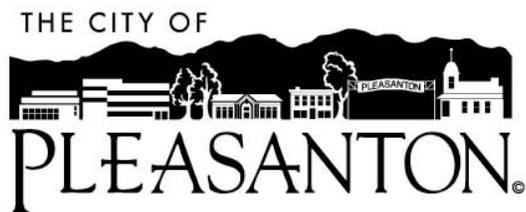


Action Plan

FY 2013

July 1, 2013 – June 30, 2014



**Alameda County
HOME Consortium
May 2013**



SF 424

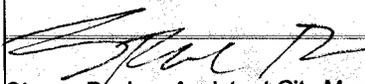
The SF 424 is part of the CPMP Annual Action Plan. SF 424 form fields are included in this document. Grantee information is linked from the 1CPMP.xls document of the CPMP tool.

SF 424

Complete the fillable fields (blue cells) in the table below. The other items are pre-filled with values from the Grantee Information Worksheet.

5/1/2013	B-05-MC-13-0050	Type of Submission	
Date Received by State	State Identifier	Application	Pre-application
Date Received by HUD	Federal Identifier	<input type="checkbox"/> Construction	<input type="checkbox"/> Construction
		<input checked="" type="checkbox"/> Non Construction	<input type="checkbox"/> Non Construction
Applicant Information			
Jurisdiction		CA62826 PLEASANTON CITY	
123 Main Street		4939724	
P.O. Box 520		Municipal Government	
Pleasanton	California	City Manager's Office	
94566	U.S.A.	Housing Division	
Employer Identification Number (EIN):		Alameda	
94-6000397		7/1	
Applicant Type:		Specify Other Type if necessary:	
Local Government: City		0	
Program Funding		U.S. Department of Housing and Urban Development	
Catalogue of Federal Domestic Assistance Numbers; Descriptive Title of Applicant Project(s); Areas Affected by Project(s) (cities, Counties, localities etc.); Estimated Funding			
Community Development Block Grant		14.218 Entitlement Grant	
CDBG application for FY 2013 for the City of Pleasanton		City of Pleasanton, County of Alameda, California	
\$272,444.00	\$Additional HUD Grant(s) Leveraged	Describe	
\$Additional Federal Funds Leveraged		\$Additional State Funds Leveraged	
\$275,000.00 Locally Leveraged Funds		\$Grantee Funds Leveraged	
\$547,444.00			
Home Investment Partnerships Program		14.239 HOME	
(by County of Alameda)		Description of Areas Affected by HOME Project(s)	
\$Additional Federal Funds Leveraged		\$Additional State Funds Leveraged	
\$Locally Leveraged Funds		\$Grantee Funds Leveraged	

Housing Opportunities for People with AIDS		14.241 HOPWA	
(NOT ELIGIBLE)		Description of Areas Affected by HOPWA Project(s)	
\$HOPWA Grant Amount	\$Additional HUD Grant(s) Leveraged	\$HOPWA Grant Amount	
\$Additional Federal Funds Leveraged		\$Additional State Funds Leveraged	
\$Locally Leveraged Funds		\$Grantee Funds Leveraged	
\$Anticipated Program Income		Other (Describe)	
Total Funds Leveraged for HOPWA-based Project(s)			
Emergency Shelter Grants Program		14.231 ESG	
(NOT ELIGIBLE)			
		\$Additional HUD Grant(s) Leveraged	
\$Additional Federal Funds Leveraged		\$Additional State Funds Leveraged	
\$Locally Leveraged Funds		\$Grantee Funds Leveraged	
\$Anticipated Program Income		Other (Describe)	
Congressional Districts of:		Is application subject to review by state Executive Order 12372 Process?	
10	10		
Is the applicant delinquent on any federal debt? If "Yes" please include an additional document explaining the situation.		<input type="checkbox"/> Yes	This application was made available to the state EO 12372 process for review on DATE
		<input checked="" type="checkbox"/> No	Program is not covered by EO 12372
<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	<input type="checkbox"/> N/A	Program has not been selected by the state for review

Person to be contacted regarding this application		
Scott	F.	Erickson
Housing Specialist	925-931-5007	925-931-5485
serickson@cityofpleasantonca.gov	http://www.ci.pleasanton.ca.us/community/0grants/cdbg-grants.html	
Signature of Authorized Representative		6/4/2013
		6/4/2013
Steven Bocian, Assistant City Manager		

Executive Summary

ES-05 Executive Summary

1. Introduction

In FY 2013, the City will receive \$272,444 in CDBG funds. In addition, the City will allocate \$115,000 in local Lower Income Housing Funds and \$160,000 in local General Funds to supplement funding for several housing projects and services which sought funds under the CDBG program funding allocation process (referred to in the aggregate as the City's Housing and Human Services Grant, or HHS Grant, Program). The FY 2013 composite funding for the HHS Grant program is shown in the table in this section.

The City recently committed land valued at \$3.5 million for the new Parkview assisted living facility that opened in 2008 at 100 Valley Avenue. The City also provided \$2.49 million in predevelopment and permanent loans and paid \$271,300 in City fees for a total of over \$3.77 million in City assistance. The City may, on a case by case basis, waive (or pay on the behalf of developers) City development fees for projects which include the construction of lower income units, either rental or ownership. In 2005, the City allocated approximately \$1.5 million to pay City fees for the 172-unit senior apartment project (The Gardens at Ironwood). This project includes 138 units for rental by low and very low income senior households. The affordability requirement will apply in perpetuity.

Activities undertaken with federal HOME Investment Partnership Program (HOME) funds are described separately in the Alameda County HOME Consortium Action Plan. In order to implement its Housing and Community Development Strategic Plan during the next fiscal year, the City of Pleasanton will allocate CDBG funds to non-profit agencies serving low income persons for the implementation of approximately 30 different projects (including projects that are wholly locally funded). \$177,090 in CDBG funds (plus approximately \$23,000 in unused funds from prior years) will go toward capital and rehabilitation projects, benefiting formerly homeless families, domestic violence victims, elderly, and indigent persons without access to health care. \$40,866 will go to fund public services in the community which are needed by low income persons, including housing counseling. As stated above, the CDBG budget for FY 2013 will be supplemented by \$275,000 in local funds. All FY 2013 activities are targeted to serve eligible households which reside within the City of Pleasanton, although several projects are located in the adjacent cities of Livermore and Dublin but serve Pleasanton residents.

The Alameda County Housing and Community Development (HCD) Program administers the HOPWA program for Alameda County, under contract from the City of Oakland. The HOPWA entitlement is received by Oakland as the largest city in the eligible Metropolitan Area. HOPWA funds can be used for a variety of housing and service activities for persons living with HIV and AIDS and are intended to serve all of Alameda County.

TABLE A:
FY 2013-14 Housing and Human Services Grant (HHS) Funding Allocation (Approved by City Council 5/7/2013; with Final CDBG Alloc. 5/29/2013)

No.	Agency Name	Project Description	Funds Requested	Total Rec.	% of Req	FUNDING SOURCE:							
						CDBG Cap/Reh	CDBG Pub Svc	CDBG Admin	CDBG Carryover	City Gen Fund	HOME	LIHF	
1) CAPITAL / REHAB													
3	Axis Community Health	Pre-Development for Capital Project (1st priority)	\$100,000	\$100,000	100%	\$100,000							
5	City of Pleasanton	City Section 108 Loan Repayment (last: 11 of 11)	\$21,408	\$21,408	100%	\$21,408							
13	Neighborhood Solutions	Housing Rehabilitation Program for City of Pleasanton	\$200,000	\$150,803	75%	\$55,682			\$25,121		\$70,000		
25	ValleyCare Health System (1)	Meals On Wheels Program (blast chiller)	\$12,000	\$0	0%								
			\$333,408	\$272,211		\$177,090	\$0	\$0	\$25,121	\$0	\$70,000	\$0	
2) SERVICES - HOUSING													
1	Abode Services	Tri-Valley Housing Scholarship Program case management	\$33,925	\$30,000	88%							\$30,000	
6	Community Resources for Independent Living	Housing and Indep Living Services for People with Disabilities	\$15,000	\$12,000	80%							\$12,000	
9	Eden Council for Hope and Opportunity	Housing Counseling Services (1st priority)	\$50,000	\$48,000	96%							\$48,000	
10	Eden Council for Hope and Opportunity	Reverse Mortgage Counseling (2nd priority)	\$5,000	\$0	0%								
23	Tri-Valley Housing Opportunity Center	Community Stabilization Program	\$30,000	\$25,000	83%							\$25,000	
			\$133,925	\$115,000		\$0	\$0	\$0	\$0	\$0	\$0	\$115,000	
3) SERVICES - MEDICAL / HEALTH													
2	Axis Community Health	Access to Care for Uninsured Low-inc Residents (2nd priority)	\$15,000	\$15,000	100%		\$2,000			\$13,000			
18	Tri-City Health Center	HIV Advocacy and Case Management	\$5,000	\$5,000	100%					\$5,000			
			\$20,000	\$20,000		\$0	\$2,000	\$0	\$0	\$18,000	\$0	\$0	
4) SERVICES - FOOD													
14	Open Heart Kitchen	Pleasanton Meal Program Trinity (2nd priority)	\$10,000	\$9,000	90%					\$9,000			
15	Open Heart Kitchen	Pleasanton Senior Meal Program (1st priority)	\$25,000	\$22,866	91%		\$12,866			\$10,000			
16	Spectrum Community Services	Congregate Senior Meal Program (1st priority)	\$21,139	\$19,000	90%		\$19,000			\$19,000			
17	Spectrum Community Services	Meals On Wheels for Homebound Elders (2nd priority)	\$5,387	\$5,000	93%		\$5,000						
22	Tri-Valley Haven	Tri-Valley Haven's Food Pantry (4th priority)	\$20,000	\$8,000	40%					\$8,000			
			\$81,526	\$63,866		\$0	\$36,866	\$0	\$0	\$27,000	\$0	\$0	
5) SERVICES - HOMELESS													
20	Tri-Valley Haven	Shloh Domestic Violence Shelter and Services (2nd priority)	\$20,000	\$18,000	90%					\$18,000			
21	Tri-Valley Haven	Sqourner House Homeless Shelter (1st priority)	\$20,000	\$22,000	110%					\$22,000			
			\$40,000	\$40,000		\$0	\$0	\$0	\$0	\$40,000	\$0	\$0	
6) SERVICES - FINANCIAL / LEGAL													
12	Legal Assistance for Seniors	Free Legal Services for Low-income Seniors	\$15,000	\$13,000	87%					\$13,000			
19	Tri-Valley Haven	Counseling and Temp Restraining Order Clinic (3rd priority)	\$20,000	\$12,000	60%					\$12,000			
			\$35,000	\$25,000		\$0	\$0	\$0	\$0	\$25,000	\$0	\$0	
7) SERVICES - DISABLED / SPECIAL NEEDS													
4	Bay Area Community Services	Valley Wellness Center	\$10,000	\$7,000	70%		\$2,000			\$5,000			
7	East Bay Innovations	Ramping Up for Independence (1)	\$7,500	\$5,000	67%					\$5,000			
8	Easter Seals Bay Area	Kaleidoscope Community Integration Program	\$10,000	\$5,000	50%					\$5,000			
			\$27,500	\$17,000		\$0	\$2,000	\$0	\$0	\$15,000	\$0	\$0	
8) SERVICES - OTHER													
11	Eden I&R, Inc	2-1-1 Alameda County	\$20,000	\$16,000	80%					\$16,000			
24	Tri-Valley YMCA (1)	Case Management Services for Children and Families	\$48,000	\$19,000	40%					\$19,000			
			\$68,000	\$35,000		\$0	\$0	\$0	\$0	\$35,000	\$0	\$0	
9) ADMINISTRATION (CDBG)													
	City of Pleasanton	Administration of CDBG Program	\$54,488	\$54,488	100%			\$54,488					
			\$54,488	\$54,488		\$0	\$0	\$54,488	\$0	\$0	\$0	\$0	
TOTAL:			\$793,847	\$642,565	81%	\$177,090	\$40,866	\$54,488	\$25,121	\$160,000	\$70,000	\$115,000	
						Esid. Funding Available:	\$177,090	\$40,866	\$54,488	\$25,121	\$160,000	\$70,000	\$115,000

FY 2013 Housing and Human Services Grant (HHS) Funding

2. Summary of the objectives and outcomes identified in the Plan Needs Assessment Overview

The Action Plan includes a detailed table that describes this year's priorities and objectives along with goals and objectives from the five-year Consolidated Plan for fiscal years 2010 through 2014.

3. Evaluation of past performance

The City's performance relative to its annual objectives can be reviewed in detail in the most recent Consolidated Annual Performance & Evaluation Report (CAPER) for FY 2010 that was produced by the Alameda County HOME Consortium. This document is available for review at the City of Pleasanton offices or on-line at www.cityofpleasantonca.gov.

A continuing impediment to affordable housing development is the occasional negative perception of affordable housing held by many members of the public. The City of Pleasanton provides local funding to East Bay Housing Organizations (EBHO) to implement an ongoing program which aimed at improving people's perceptions and understanding of affordable housing. In conjunction with other Tri-Valley cities, the City of Pleasanton will collaborate with EBHO in FY 2013 to sponsor activities related to Affordable Housing Week, held annually in May.

The City's Housing Authority now receives approximately \$50,000 annually through the Capital Fund Program for modernization improvements at Kottinger Place (a 50-unit Public Housing complex for seniors). The City has been working since the mid-1990's with small nonprofit agencies such as East Bay Innovations, Bay Area Community Services (BACS), and REACH (formerly HOUSE, Inc.) to secure housing for persons with special needs. The City recently developed a housing resource packet targeted specifically at housing needs for persons with disabilities. Pleasanton initiated a Tri-Valley Housing Scholarship Program in 1999 in collaboration with the City of Livermore using HOME funds for rental subsidies and local funds for case management services. The City will utilize CDBG and local funds in FY 2013 to provide counseling and case management services for households with special needs.

The Section 8 certificate and voucher program is currently coordinated through the Housing Authority of the County of Alameda. The City established an Economic Vitality Committee in 1995 to promote economic development in Pleasanton. The City enjoyed strong economic growth in the late 1990's and early 2000's, although the economic sector has slowed throughout the region in recent years.

The City of Pleasanton recently completed a comprehensive update to its General Plan. In addition, a major update to the Housing Element was completed in late 2011 and was certified by State HCD in 2012. The update included the rezoning of approximately 80 acres of land for high residential use which will significantly increase opportunities for affordable housing development. With these revisions, up-to-date housing policies will be in place in FY 2013 and subsequent years to guide City programs for affordability, preservation, discrimination, and other housing and community development issues.

4. Summary of citizen participation process and consultation process

The City held two joint HHSG grant application workshops in collaboration with the cities of Livermore and Dublin in early December 2011. Notices regarding the workshops were mailed directly to over agencies and persons in an "interest list" data base, and notices were also published in the key local newspapers and on city web sites prior to the workshops. HHSG grant applications were reviewed in three public meetings held in March and April 2013. All meetings were noticed in a newspaper of general circulation as well as a local paper that is delivered to all Pleasanton residents. Alameda County also published notices regarding the overall Action Plan (which includes all entitlement cities and the urban county) in ANG newspapers throughout the County. Copies of the draft Action Plan were provided to the main Library and City Hall in Pleasanton for public review. A 30-day public review period, coordinated by Alameda County HOME Consortium, was held from late March through the end of April 2013.

5. Summary of public comments

As noted above, the FY 2013 Action Plan was reviewed at three public hearings in March (the City's Human Services and Housing Commissions) and April 2013 (the City Council). The two Commissions heard brief presentations from subrecipient agencies and entertained comments from interested members of the public. In the past, subrecipient agencies have generally commented that the CDBG funds which they received enabled projects to be implemented and services to be provided which otherwise could not have been accomplished. In the past, agencies have expressed frustration with the difficulty in making progress on capital and construction projects due to the current economy and the impact of the prevailing wage requirement relative to the local construction market (i.e., contractors often choose not to bid on small jobs that involve the use of federal funds due to increased project costs and higher administrative burden). However, the recent weak construction economy has reversed this trend in some cases. The more common concern is the impact of significant rent increases which is making it difficult for low-income households, particularly those who rely on Section 8 rental assistance. In general, the lack of affordable housing is perceived as an issue that is intermingled with many other human service needs.

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

There were none.

7. Summary

[None]

PR-05 Lead & Responsible Agencies

1. Agency/entity responsible for preparing/administering the Consolidated Plan

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
Lead Agency	PLEASANTON	

Table 1 – Responsible Agencies

Narrative

The City of Pleasanton is a member of the Alameda County HOME Consortium. The Consolidated Plan is submitted for the entire Consortium under the coordination of the Alameda County Community Development Agency, with each member jurisdiction contributing its own section of the Plan.

Consolidated Plan Public Contact Information

Scott Erickson, Housing Specialist
City of Pleasanton
123 Main St., P.O. Box 520
Pleasanton, CA 94566-0802
Tel. 925-931-5007

AP-10 Consultation

1. Introduction

The City of Pleasanton recently completed several key planning activities:

- Comprehensive General Plan update (2009)
- Tri-Valley Human Services Needs Assessment update (2011)
- Housing Element revision (2012)

These revisions have produced up-to-date policies for housing and human services that will be in place in FY 2013 and subsequent years to guide City programs for affordability, preservation, discrimination, and other housing and community development issues.

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

The City of Pleasanton completed a comprehensive update to its General Plan in 2009 resulting in up-to-date policies for housing and human services. A comprehensive update to the Housing Element was completed in 2011 and certified by State HCD in 2012. The update included the rezoning of 70 acres of land for future high-density housing development. A workshop was held in February 2013 for nonprofit housing agencies to provide information on the rezonings including development potential, property owner information, and City assistance programs.

The City's Human Services Commission meets monthly to coordinate the delivery of services (including housing) to lower income residents and special needs groups in the area in cooperation with "Interact," a body comprised of representatives of each of the social service agencies in the Tri Valley area. Approximately twice yearly, the Commission holds a special, joint meeting with the City of Livermore Human Services Commission. The purpose of these joint meetings is to coordinate the delivery of services in the greater Tri Valley area.

In 2011, the cities completed a comprehensive update to the Tri-Valley Human Services Needs Assessment originally completed in 2003. The update incorporates data from the 2010 Census and will provide an updated and more accurate picture of services gaps in the Tri-Valley.

The Human Services Commission also collaborates yearly with the City's Housing Commission to conduct a joint review as part of the annual process of allocating CDBG funds. This collaborative effort, begun in 1996, has helped to improve the coordination of assistance to housing and services in the area and has helped to simplify the process of allocating funds to local non-profits, thereby improving service delivery.

The City recently redesigned its grant programs into a single consolidated grant program called the Housing and Human Services Grant (HHSO). The HHSO program was developed in 2009 as a refinement and consolidation of four separate grant programs:

1. Federal Community Development Block Grant (CDBG) Funds
2. Federal HOME Investment Partnership Program (HOME) Funds
3. City Lower Income Housing Funds for Housing
4. City General Funds for Human Services (formerly "City Grant")

The consolidation of these four funding sources into a single streamlined grant program has created greater efficiencies in the allocation of limited funding sources as well as the coordination and delivery of human services. While each source has specific priorities and requirements, there is an overarching priority for funding programs and services that benefit low income residents and for addressing gaps in housing and services.

The City of Pleasanton has continued to take a lead role in the activities of the Tri-Valley Affordable Housing Committee (TVAHC), which is made up of representatives of cities in the Livermore Amador Valley area (Pleasanton, Livermore, Dublin, San Ramon, and Danville). The TVAHC has actively participated in annual outreach activities promoting public awareness of affordable housing in the Tri-Valley area, working with the East Bay Housing Organizations (EBHO). In addition, the TVAHC initiated the successful establishment of the Tri-Valley Housing Opportunity Center (TVHOC) which opened in 2005. The TVHOC serves as a "clearing house," initially for ownership programs and ultimately for a continuum of housing assistance of different types in the Tri-Valley.

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

[by Alameda County]

Describe consultation with the Continuum(s) of Care that serves the State in determining how to allocate ESG funds, develop performance standards for and evaluate outcomes of projects and activities assisted by ESG funds, and develop funding, policies and procedures for the operation and administration of HMIS

[by Alameda County]

2. Agencies, groups, organizations and others who participated in the process and consultations

Agency/Group/Organization	Agency/Group/Organization Type	What section of the Plan was addressed by Consultation?
TRI-VALLEY HAVEN FOR WOMEN	Services-Victims of Domestic Violence	Homeless Needs - Families with children
LEGAL ASSISTANCE FOR SENIORS	Services-Elderly Persons	Non-Homeless Special Needs
EDEN COUNCIL FOR HOPE AND OPPORTUNITY	Housing Services-homeless Service-Fair Housing	Housing Need Assessment Homeless Needs - Chronically homeless Homeless Needs - Families with children
COMMUNITY RESOURCES FOR INDEPENDENT LIVING	Housing Services-Persons with Disabilities	Housing Need Assessment Non-Homeless Special Needs
OPEN HEART KITCHEN	Services-homeless	Non-Homeless Special Needs
AXIS COMMUNITY HEALTH	Services-Health Health Agency	Non-Homeless Special Needs Health care
ABODE SERVICES	Housing Services-homeless	Housing Need Assessment Homelessness Strategy Non-Homeless Special Needs
NEIGHBORHOOD SOLUTIONS	Housing	Non-Homeless Special Needs
SPECTRUM COMMUNITY SERVICES	Services-Elderly Persons	Non-Homeless Special Needs
TRI-CITY HEALTH CENTER	Services-Health	Non-Homeless Special Needs
EASTER SEALS BAY AREA	Services-Persons with Disabilities	Non-Homeless Special Needs
EDEN INFORMATION AND REFERRAL	Services-Children Services-Elderly Persons Services-Persons with Disabilities Services-Persons with HIV/AIDS Services-Victims of Domestic Violence Services-homeless Services-Health Services-Education	Non-Homeless Special Needs

Agency/Group/Organization	Agency/Group/Organization Type	What section of the Plan was addressed by Consultation?
	Services-Employment Service-Fair Housing	
EAST BAY INNOVATIONS	Services-Persons with Disabilities	Non-Homeless Special Needs
HUMAN SERVICES COMMISSION	Other government - Local	Non-Homeless Special Needs
HOUSING COMMISSION	Housing Other government - Local	Housing Need Assessment

Table 2 – Agencies, groups, organizations who participated

How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination

Provided input in the development of the Tri-Valley Human Services Needs Assessment.

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

[None]

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 CARE	Alameda County Community Development Agency	They are incorporated.

Table 3 – Other local / regional / federal planning efforts

Narrative

AP-12 Participation

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

Citizen Participation Outreach

Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
Public Meeting	Non-targeted/broad community	Representatives from approximately 30 agencies that applied for HHSG funding attended public meetings of the Pleasanton Human Services Commission (3/6/2013) and Housing Commission (3/21/2013).	Minutes from the public meetings are on file at the City of Pleasanton. In general, applicant agencies expressed appreciation for the availability of HHSG funds to support	[None]	

Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
			important local housing and services for low-income residents and noted ongoing funding challenges.		
Newspaper Ad	Minorities Non-English Speaking - Specify other language: Spanish Persons with disabilities Non-targeted/broad community	Representatives from approximately 60 agencies (and other interested parties) attended two application workshops in early December 2012).	Information was provided by City representatives regarding the local grant programs offered by the cities of Pleasanton, Livermore, and Dublin.	[None]	

Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
	Residents of Public and Assisted Housing				
Other	Agencies Serving Low-Income Persons	Representatives from approximately 60 agencies (and other interested parties) attended two application workshops in early December 2012).	Information was provided by City representatives regarding the local grant programs offered by the cities of Pleasanton, Livermore, and Dublin.	[None]	http://www.ci.pleasanton.ca.us/community/grants/cdbg-grants.html

Table 4 – Citizen Participation Outreach

Expected Resources

AP-15 Expected Resources

Introduction

This section identifies Federal, State, local, and private resources which may be used to meet the City of Pleasanton's housing and community development goals. Resources can be sources of funds or technical assistance and can be available to private and non-profit entities as well as to local government agencies. The resources are categorized within each jurisdictional level by eligible activity. The list includes resources the City has on-hand or expects to receive.

Anticipated Resources

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Reminder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
CDBG	public - federal	Acquisition Admin and Planning Economic Development Housing Public Improvements Public Services	272,444	0	23,000	295,444	0	The City of Pleasanton is an entitlement jurisdiction and applies directly to HUD on an annual basis for funding from the CDBG program. CDBG funds can be used for a variety of housing and community development activities which benefit lower income people.
General Fund	public - local	Housing Public Services	275,000	0	0	275,000	0	The City of Pleasanton will provide approximately \$115,000 in Lower Income Housing Funds to support housing-related

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Reminder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
								projects and services in FY 2013. The City will also provide \$160,000 in General Funds to supplement limited CDBG funds for important human services.
Other	public - federal	Housing	70,000	0	0	70,000	0	The City of Pleasanton receives HOME funds via a formula allocation through the Alameda County HOME Consortium. HOME provides flexible funding to states and local governments for affordable housing programs for low income households. HOME funds can be used to acquire, rehabilitate, finance, and construct affordable housing, as well as to provide tenant-based assistance.

Table 1 - 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

For all housing and community development activities, the City of Pleasanton will support applications by other entities to all public and private sources of financing. In the case of matching requirements for a funding source, the City will use for a match such sources as City Lower Income Housing Funds, other local agency funds, publicly owned land, and private donations. To maximize leveraging of its own funds and to increase the funds available for housing, the City plans to undertake the following activities:

- Support the purchase and rehabilitation and construction of units by non-profit housing developers.

- Continue participation in the Mortgage Credit Certificate (MCC) program operated by the County of Alameda.
- Continue to provide support to non-profit, community-based housing developers and service providers.
- Promote joint development with other governmental or quasi-governmental agencies to implement community development programs (as exemplified in the recent collaborative acquisition and rehabilitation of the Sojourner House shelter facility, the establishment of the Tri-Valley Housing Opportunity Center, and the future relocation of the Axis Community Health community clinic facility).

The matching requirements of HUD programs will be satisfied primarily through the use of City Lower Income Housing Funds, where needed, or through funds provided by non-profit agencies which are the sub-recipients of HUD funds allocated to the City. The matching requirement is included in City application forms for federal funding used for sub-recipients and the requirement is ensured throughout the project review and approval process.

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

The 7.4-acre parcel of land on Case Avenue where "The Promenade" apartment project was built was provided by the City through a long-term ground lease. The property had an appraised value of approximately \$2.2 million at the time of construction. In 2006, the City contributed (through a similar ground lease) an additional 3.6-acre site on Sunol Boulevard valued at over \$3.5 million for the construction of the Parkview assisted care facility for seniors. The City recently completed a comprehensive update to its Housing Element that involved the rezoning of 70 acres of land throughout Pleasanton for high density residential use. These parcels, some of which may eventually come under the City's ownership, are expected to yield significant new opportunities for affordable housing development over the next decade. The updated Housing Element was certified by State HCD in 2012.

Discussion

Recent developments in Congress indicate that the nature and level of federal housing, homeless, and community development funding programs will change and potentially be reduced during the next several years. The City, through its involvement as part of the Alameda County HOME Consortium, will monitor these developments closely and will continue to promote the Consortium's housing and community development objectives through active policy development and use of available federal and non-federal funding sources.

Annual Goals and Objectives

AP-20 Annual Goals and Objectives

Goals Summary Information

Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
Preserve Existing Low-Income Housing	2013	2014	Affordable Housing	Citywide	Preserve Existing Low-Income Housing	CDBG: \$71,200 HOME: \$100,000	Rental units rehabilitated: 1 Household Housing Unit Homeowner Housing Rehabilitated: 15 Household Housing Unit
Assist Low/Mod Home Buyers	2013	2014	Affordable Housing	Citywide	Assist Low/Mod Home Buyers	CDBG: \$0 General Fund: \$0 HOME: \$0	Direct Financial Assistance to Homebuyers: 0 Households Assisted
Reduce Housing Discrimination	2013	2014	Affordable Housing	Citywide	Reduce Housing Discrimination	General Fund: \$48,000	Other: 300 Other
Maintain / Expand / Improve Shelter Services	2013	2014	Homeless	Citywide	Maintain / Expand / Improve Shelter Services	General Fund: \$52,000	Homeless Person Overnight Shelter: 50 Persons Assisted
Homelessness Prevention Activities	2013	2014	Homeless	Citywide	Homeless Prevention Activities	General Fund: \$54,000	Homelessness Prevention: 100 Persons Assisted
Inter-Jurisdictional Cooperation for Housing	2013	2014	Homeless	Citywide	Inter-Jurisdictional Cooperation for Housing	General Fund: \$25,000	Homelessness Prevention: 100 Persons Assisted

Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
Special Needs Housing	2013	2014	Non-Homeless Special Needs	Citywide	Special Needs Housing	CDBG: \$0 General Fund: \$0 HOME: \$0	Rental units constructed: 0 Household Housing Unit
Improve Community Health Care Access	2013	2014	Non-Housing Community Development	Citywide	Improve Community Health Care Access	General Fund: \$18,000	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 300 Persons Assisted
Improved Youth Wellness and Development	2013	2014	Non-Housing Community Development	Citywide	Improved Youth Wellness and Development	General Fund: \$19,000	Public service activities other than Low/Moderate Income Housing Benefit: 50 Persons Assisted
Senior Programs	2013	2014	Non-Housing Community Development	Citywide	Senior Programs	CDBG: \$34,200 General Fund: \$13,000	Public service activities other than Low/Moderate Income Housing Benefit: 100 Persons Assisted
Address Emerging Community Needs	2013	2014	Non-Housing Community Development	Citywide	Address Emerging Community Needs	General Fund: \$13,000	Public service activities other than Low/Moderate Income Housing Benefit: 50 Persons Assisted
Public Service Support	2013	2014	Non-Housing Community Development	Citywide	Public Service Support	General Fund: \$22,000	Public service activities other than Low/Moderate Income Housing Benefit: 50 Persons Assisted
Capital Improvement Projects	2013	2014	Affordable Housing Homeless Non-Homeless Special Needs	Citywide	Capital Improvement Projects	CDBG: \$100,000	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 12000 Persons Assisted

Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
			Non-Housing Community Development				
Downtown Economic Development	2013	2014	Non-Housing Community Development	Citywide	Downtown Economic Development	CDBG: \$0 General Fund: \$0 HOME: \$0	Facade treatment/business building rehabilitation: 0 Business

Table 2 – Goals Summary

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 91.215(b)

Because of the small amount of CDBG funding received by Pleasanton, most of the City's housing production activities are funded through other sources not covered in this plan. Information on the number of extremely low-income, low-income, and moderate-income families that will be provided with affordable housing assistance (rental assistance, production of new units, rehabilitation of existing units, and acquisition of existing units) directly related to the use of the City's limited CDBG allocation (supplemented by local funds) is found in Section AP-55.

Projects

AP-38 Project Summary

Project Summary Information

Project Name	Target Area	Goals Supported	Needs Addressed	Funding
City of Pleasanton - Administration of CDBG Program	Citywide	Preserve Existing Low-Income Housing Assist Low/Mod Home Buyers Reduce Housing Discrimination Maintain / Expand / Improve Shelter Services Homelessness Prevention Activities Inter-Jurisdictional Cooperation for Housing Special Needs Housing Improve Community Health Care Access Improved Youth Wellness and Development Senior Programs Address Emerging Community Needs Public Service Support Capital Improvement Projects	Preserve Existing Low-Income Housing Assist Low/Mod Home Buyers Reduce Housing Discrimination Maintain / Expand / Improve Shelter Services Homeless Prevention Activities Inter-Jurisdictional Cooperation for Housing Special Needs Housing Improve Community Health Care Access Improved Youth Wellness and Development Senior Programs Address Emerging Community Needs Public Service Support Capital Improvement Projects	CDBG: \$54,488

		Downtown Economic Development	Downtown Economic Development	
City of Pleasanton - Section 108 Loan Repayment	Citywide	Preserve Existing Low-Income Housing Homelessness Prevention Activities	Preserve Existing Low-Income Housing Maintain / Expand / Improve Shelter Services Homeless Prevention Activities	CDBG: \$21,408
Axis Community Health - Pre-Development for Capital Project	Citywide	Improve Community Health Care Access Capital Improvement Projects	Improve Community Health Care Access Capital Improvement Projects	CDBG: \$100,000
Axis Community Health - Health Care Access for Low-Income	Citywide	Improve Community Health Care Access	Improve Community Health Care Access	CDBG: \$2,000
Neighborhood Solutions - Housing Rehabilitation Program	Citywide	Preserve Existing Low-Income Housing	Preserve Existing Low-Income Housing	CDBG: \$55,682
Spectrum Community Services - Meals-on-Wheels Program	Citywide	Senior Programs	Senior Programs	CDBG: \$5,000
Spectrum Community Services - Congregate Senior Meal Program	Citywide	Senior Programs	Senior Programs	CDBG: \$19,000
Open Heart Kitchen - Senior Meal Program	Citywide	Senior Programs	Senior Programs	CDBG: \$12,866
Bay Area Community Services - Valley Wellness Center	Citywide	Public Service Support	Public Service Support	CDBG: \$2,000

Table 3 – Project Summary

AP-35 Projects

Introduction

This section includes a description of individual activities to be funded with FY 2013 Community Development Block Grant (CDBG) funding. It does not include activities in the City's overall Housing and Human Services Grant (HHSG) Program that are funded through other sources as a supplement to CDBG funds (e.g., local Lower Income Housing Funds and General Funds for human services). This section also includes a description of how the City will ensure geographic distribution of its resources, the process by which assistance will be distributed in the case that an activity location is currently unknown (e.g., residential rehabilitation programs), activities benefiting homeless and other special needs populations, and other local or state programs being used to further the jurisdiction's housing and community development goals. Activities undertaken with federal HOME Investment Partnership Program (HOME) funds are described separately in the Alameda County HOME Consortium Action Plan.

#	Project Name
1	City of Pleasanton - Administration of CDBG Program
2	City of Pleasanton - Section 108 Loan Repayment
3	Axis Community Health - Pre-Development for Capital Project
4	Axis Community Health - Health Care Access for Low-Income
5	Neighborhood Solutions - Housing Rehabilitation Program
6	Spectrum Community Services - Meals-on-Wheels Program
7	Spectrum Community Services - Congregate Senior Meal Program
8	Open Heart Kitchen - Senior Meal Program
9	Bay Area Community Services - Valley Wellness Center

Table 4 – Project Information

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

The City's Human Services Commission and Housing Commission reviewed all applications received for HHSG funding and attempted to allocate HHSG funds (including CDBG funds) to as many eligible agencies as possible given the limitation of funding. Most applications were deemed to meet at least one of the City's established priorities. No applications were received in response to the City's stated priority for providing primary dental services. It was noted that this was due primarily to a lack of funding availability for primary dental care as compared to primary health care.

AP-50 Geographic Distribution

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

Funding for the activities listed in this section will generally be distributed within the City of Pleasanton. However, certain projects receiving funding may be located within other jurisdictions, such as the adjacent cities of Livermore and Dublin, in cases where the agencies serve Pleasanton residents as part of services provided within the greater Tri-Valley area. All activities listed in this section are targeted to serve eligible households that reside within the City of Pleasanton. Certain programs are not tracked to a particular geographic locale before specific sites are funded.

Geographic Distribution

Target Area	Percentage of Funds
Citywide	100

Table 5 - Geographic Distribution

Rationale for the priorities for allocating investments geographically

[Not applicable]

Discussion

For many programs using CDBG funds, such as residential or business rehabilitation, the exact location of the activity is not determined prior to funding the program as a whole. Pursuant to the Final Rule for the CDBG Program, the Action Plan must identify who may apply for assistance, the process by which the grantee will select those to receive assistance, and how much and under what terms the assistance will be given.

Alameda County HCD administers a Rehabilitation Program using CDBG funds for most jurisdictions in the HOME Consortium, although the level of rehabilitation services varies among cities. [The City of Pleasanton will utilize a different contractor, Neighborhood Solutions, to administer its Housing Rehabilitation Program in FY 2013.] The goal of the program is to conserve, preserve, and improve the housing and neighborhoods of low and moderate income people living in the County. To that end, the program provides grants or low interest loans to qualifying properties and owners to provide a variety of rehabilitation services, such as rental housing rehabilitation, minor and major home repairs, mobile home repairs, exterior paint or clean-up assistance, seismic retrofitting, and accessibility repairs.

The owner rehabilitation program is targeted to owner-occupied households that qualify as low income by earning less than 80 percent of the PMSA median income. Depending on the level and cost of rehabilitation, grants or low- or no-interest loans are offered. For the owner programs, income, the applicant's address, and the type and extent of rehabilitation work are checked to determine the applicant's eligibility, the type of financing, and whether the rehabilitation program is offered in the applicant's jurisdiction.

The rental rehabilitation program is available to those properties in which at least 51 percent of the units are occupied by low and very low income households, or in which 51 percent of the units will be rent-restricted through a rental agreement to qualified low income households after rehabilitation. This program provides below market interest rate loans to property owners to complete the rehabilitation. Tenants' incomes are verified to determine whether at least half of the units are occupied by lower income households. The property's operating budget is also examined to determine the property's long-term financial feasibility.

Affordable Housing

AP-55 Affordable Housing

Introduction

Because of the small amount of CDBG funding received by Pleasanton, most of the City's housing production activities are funded through other sources not covered in this plan. This sections addresses affordable housing assistance (rental assistance, production of new units, rehabilitation of existing units, and acquisition of existing units) that is directly related to the use of the City's limited CDBG allocation as supplemented by local funds through the Housing and Human Services Grant (HHSG) program.

One Year Goals for the Number of Households to be Supported	
Homeless	10
Non-Homeless	50
Special-Needs	50
Total	110

Table 6 - One Year Goals for Affordable Housing by Support Requirement

One Year Goals for the Number of Households Supported Through	
Rental Assistance	6
The Production of New Units	0
Rehab of Existing Units	15
Acquisition of Existing Units	0
Total	21

Table 7 - One Year Goals for Affordable Housing by Support Type

Discussion

The affordable housing statistics presented in this section are related to the following projects:

- Neighborhood Solutions - Housing Rehabilitation Program
- Abode Services - Tri-Valley Housing Scholarship Case Management Program
- Tri-Valley Housing Opportunity Center - Community Stabilization Program
- Tri-Valley Haven - Shiloh and Sojourner Shelter Facilities

As noted previously, the City of Pleasanton funds housing production through other funding sources not related to CDBG.

AP-60 Public Housing

Introduction

The City currently administers two below-market rent senior housing projects: 1) Ridge View Commons (200 units; owned by a private non-profit affiliated with Eden Housing), and 2) Kottinger Place (50 units of HUD-subsidized Public Housing; owned by the Pleasanton Housing Authority). Kottinger Place is the only property owned by the Pleasanton Housing Authority, and the PHA does not have a Section 8 program (all Section 8 assistance in Pleasanton is administered by the Housing Authority of the County of Alameda).

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

As part of an on-going program, the City has allocated CDBG and City Lower Income Housing Funds for several years to make facility improvements at Kottinger Place, which is almost 40 years old. Past improvement projects include reroofing, repainting, installation of new doors, and landscape rehabilitation to decrease maintenance costs. This program will continue in FY 2012 with an emphasis on interior and exterior rehabilitation improvements, including a major project to replace old single-pane windows with new, energy-efficient dual pane windows. A \$260,000 federal CIAP grant was awarded to the project in 1996 and construction was recently completed on modernization improvements at Kottinger Place. The complex now receives an annual allocation of Capital Funds from HUD (approximately \$50,000 per year) which is enabling improvements to the physical aspects of the project. In 2006, the complex began receiving HUD Operating Subsidy funds of approximately \$90,000 which has greatly improved the operational aspects of the project.

The Housing Authority is currently collaborating with the City of Pleasanton and with the Pleasanton Gardens Board of Directors on a potential project to redevelopment Kottinger Place to create a new, larger housing complex for extremely low income seniors. This action is discussed in greater detail below.

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

No resident initiatives are deemed necessary in the five-year period. However, the City continues to work with the Pleasanton Housing Authority on the preparation of annual Housing Authority Agency Plan update required by HUD. The City will continue to coordinate with the Housing Authority during the coming five-year period.

The single property owned by the Housing Authority, Kottinger Place (50 units), has traditionally served as housing for extremely low income elderly persons. Therefore, no homeownership strategies have been promoted in the past and none are planned for the future. Representatives from the City and Housing Authority meet bi-monthly with residents and management to discuss issues of interest. In addition, the Housing Authority Board of Commissioners includes two resident representatives who attend periodic meetings to discuss issues of general interest and matters specific to the property (e.g., Annual Agency Plan, Operating Budget, etc.). These actions are planned to continue in the coming year.

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

[Not applicable; the Pleasanton Housing Authority was recently designated as a high-performing housing authority.]

Discussion

In 2003, the Pleasanton City Council approved an 11-member task force to study the potential for redeveloping Kottinger Place, a 50-unit Public Housing complex for elderly persons located at 240 Kottinger Drive in Pleasanton. This is part of a long-term effort to plan for the eventual replacement of these units, which comprise the only housing units administered by the Pleasanton Housing Authority. The project may also involve an adjacent senior development, Pleasanton Gardens (40 units located across the street at 251 Kottinger Drive).

The task force includes representatives from the City Council, Housing Commission, and the Parks and Recreation Commission as well as eight at-large members (including residents of the two senior complexes). The group met regularly since 2004 and obtained consultant services (with Christian Church Homes) to analyze processing and financing issues for the project. In early 2010, the City Council reviewed information collected by the task force and confirmed its interest in moving forward with the project. The task force is considering replacing one or both of the existing developments with a larger number of units, using the current affordability levels as a minimum for any future project. MidPen Housing was recently selected as the developer for the project. In 2011, the City took advantage of an opportunity to purchase a 0.5 acre site directly adjacent to the existing development which will be available to facilitate the redevelopment. Due to the scope of this project, it will likely extend beyond the term of the five-year Consolidated Plan.

AP-65 Homeless and Other Special Needs Activities

Introduction

The City's activities around homeless and other special needs activities are related primarily to participation in the EveryOne Home County-wide Homeless and Special Needs Housing Plan. This Plan is coordinated by the Alameda County Community Development Agency as the lead agency.

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

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

[by Alameda County CDA]

Addressing the emergency shelter and transitional housing needs of homeless persons

[by Alameda County CDA]

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

[by Alameda County CDA]

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.

[by Alameda County CDA]

Discussion

[by Alameda County CDA]

AP-75 Barriers to affordable housing

Introduction

This section includes the actions planned by the City of Pleasanton during the next year to reduce barriers to 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 City of Pleasanton is an active member of the Alameda County HOME Consortium. In 2010, the Consortium completed an updated Analysis of Impediments to Fair Housing as part of its fair housing planning program. The HOME Consortium Analysis of Impediments includes demographic information for each jurisdiction, an evaluation of each jurisdiction's fair housing status, a description of public and private impediments to fair housing choice, and an assessment of current public and private fair housing programs.

The City provides fair housing and housing counseling services to area residents through a contract with ECHO Housing. The City's funding is high on a per-capita basis relative to other communities, and the majority of this service is paid for with local rather than HUD funds. ECHO's services include investigation of housing discrimination complaints as well as educational seminars for housing managers, owners, realtors, and tenants. City staff works with ECHO to address identified impediments. In addition to the general services provide through the City's contract with ECHO Housing, the City has been active in the following areas:

- The City has supported a variety of grass-roots efforts over the past decade that have resulted in the construction of new, affordable housing for a wide spectrum of housing needs in the community (family rental, senior, first-time home buyer, disabled, and other special needs). The majority of these efforts have involved local funds.
- The City sponsors, through an annual contribution of local funds, the efforts of the East Bay Housing Organization (EBHO) public education campaign to address local opposition to and misperceptions of affordable housing.
- The City has collaborated extensively with its neighbor city, Livermore, on housing programs and issues of shared concern (e.g., Bluebell transitional housing, Sojourner House emergency shelter). The cities are currently working on a potential new Section 108 loan which would provide financing for the future relocation of the Axis Community Clinic to a new site in north Pleasanton.
- The City has supported an extensive Housing Rehabilitation Program through partnership with Neighborhood Solutions (NS). Our contract with NS has ensured outreach to minority and women contractors as well as local business enterprises.
- The City also offers rehabilitation grants and loans through the Housing Rehabilitation Program to assist landlords in removing accessibility barriers to expand rental opportunities for persons

with physical disabilities. In addition, the City has used local, State, and HOME funds to construct and or acquire and rehabilitate housing units for rental by persons with physical, mental, and developmental disabilities.

- In 1999, Pleasanton helped establish the Tri-Valley Housing Scholarship Program which offers tenant-based rental assistance to households that are homeless or at risk of being homeless. Subsidies are provided while the head of household is undergoing job training. Over 90% of households served are headed by female heads of households, and the majority of clients have been minority households.
- The City collaborated with other Tri-Valley jurisdictions to establish the Tri-Valley Housing Opportunity Center (TVHOC) which opened in 2005. The TVHOC functions as a “clearing house,” initially for ownership programs and ultimately for a continuum of housing assistance of different types. Now in its seventh year of operation, the TVHOC recently started providing important resources in response to the increased frequency of loan defaults and foreclosures.

Discussion

Funding. One of the significant barriers to affordable housing in Pleasanton and the surrounding region is the high cost of developing and maintaining affordable housing. The City of Pleasanton will apply CDBG, HOME, and City Lower Income Housing Funds toward affordable housing projects and programs in FY 2013. The City has also monitored the availability of specialized grants for housing development (e.g., State DDS-R and HELP). The City will also continue to utilize its Lower Income Housing Fund (supported through payment of the Lower Income Housing Fee by developers) to finance activities promoting affordable housing.

Land Costs. The City does not have ownership of any significant parcels of land at the present time. Therefore, the market cost of land is posing an ongoing constraint to new affordable housing development in which the City has direct involvement. However, the City has worked and will continue to work with individual developers and with the owners of large land holdings to attempt to reserve additional sites for affordable housing development during the five-year Strategic Plan period. The City was recently successful in negotiating 15 percent set-asides of affordable housing units in several new rental apartment developments. The adoption of an Inclusionary Zoning Ordinance in late 2000 has yielded positive results in the form of discussions of possible land dedication in lieu of builders providing affordable housing units, although the strength of inclusionary requirements has been challenged by recent legal actions. The completion of the updated Housing Element in 2011 may provide additional land ownership opportunities that can be utilized to create new affordable housing.

Housing Development Costs. The City will continue to work to offset the costs of housing development by waiving certain City fees for affordable rental and ownership housing units and by providing various types of subsidies through the use of its Lower Income Housing Fund. The example was cited earlier in this report of extensive fee waivers that have been granted in the past to defray development costs and promote affordable housing construction.

Community Perceptions of Affordable Housing. A continuing impediment to affordable housing development is the negative perception of affordable housing held by many members of the public. The City provides local funds annually to East Bay Housing Organizations (EBHO) to implement an ongoing program aimed at improving residents’ perceptions and understanding of affordable housing.

Pleasanton collaborated with its neighbor cities in the Tri-Valley to hold a tour of affordable housing developments and issues in 2009 (a similar tour is planned for July 2013). The recent Housing Element update process provided an additional forum for discussion of affordable housing issues.

In conjunction with other Tri-Valley cities, the City of Pleasanton will work with EBHO in FY 2013 in activities related to Affordable Housing Week, held annually in May. This will include media presentations, affordable housing tours, and other activities focusing specifically on affordable housing efforts past, present, and future in the Tri-Valley area. In May 2012, the cities sponsored an event entitled “The Benefit of Meeting Employee Housing Needs” at the Firehouse Arts Center in Pleasanton to promote interest among the business community in supporting the development of affordable housing.

The City collaborated with BayEast Association of Realtors in its sponsorship of a “real estate town hall meeting” in April 2011. In May 2009, a similar event also highlighted the National Association of Realtors (NAR) “Ambassadors for Cities” award to BayEast and the City of Pleasanton relative to their support of the Tri-Valley Housing Opportunity Center (one of only five awards NAR throughout the nation).

AP-85 Other Actions

Introduction

This section describes the City of Pleasanton's planned actions to carry out the following strategies outlined in the Consolidated Plan:

- Foster and maintain affordable housing;
- Evaluate and reduce lead-based paint hazards;
- Reduce the number of poverty-level families;
- Develop institutional structure; and
- Enhance coordination.

The sections also identifies obstacles to meeting underserved needs and propose actions to overcome those obstacles.

Actions planned to address obstacles to meeting underserved needs

The City of Pleasanton's Human Services Commission meets monthly to coordinate the delivery of services (including housing) to lower income residents and special needs groups in the area in cooperation with "Interact," a body comprised of representatives of each of the social service agencies in the Tri Valley area. Approximately twice yearly, the Commission holds a special, joint meeting with the City of Livermore Human Services Commission to coordinate the delivery of services in the greater Tri Valley area. The cities recently completed a comprehensive to the Tri-Valley Human Services Needs Assessment that was originally completed in 2003. The update incorporates data from the 2010 Census and will provide an updated and more accurate picture of services gaps in the Tri-Valley.

Actions planned to foster and maintain affordable housing

The specific actions planned by the City of foster and maintain affordable housing are described in detail in section AP-75 (Barriers to Affordable Housing) of this Plan.

Actions planned to reduce lead-based paint hazards

The Alameda County Lead Poisoning Prevention Program (ACLPPP), a department of the Alameda County Community Development Agency, plays a primary role in addressing prevention and treatment of lead poisoning county-wide. Its lead hazard reduction program is focused within the County Services Area (CSA), the special district which funds lead poisoning prevention efforts in the Cities of Alameda, Berkeley, Emeryville, and Oakland. Pleasanton is not currently a member of the CSA.

ACLPPP provides technical assistance to local agencies to encourage the incorporation of lead-safe practices into existing and planned programs affecting health, housing and environmental health. In order to achieve the Federal and State 2010 goal for the elimination of childhood lead poisoning, significant resources will be needed to educate property owners of their responsibilities, develop a trained construction workforce, provide financial assistance for low-income privately-owned housing

and develop a compliance infrastructure of local agencies. ACLPPP applied under the FY 2005 SuperNOFA for funds to continue the Lead Hazard Control Grant Program and Healthy Homes Demonstration Project and is seeking out additional resources, opportunities and partnerships to support the 2010 goal.

The Housing and Community Development Department conducts lead-based paint inspections on tenant-based rental assistance for HOME and HOPWA units built before 1978 on an annual basis. Units that are managed by the Alameda County Housing Authority also conduct lead inspections as a part of the Housing Quality Standard (HQS) Inspections for all Shelter Plus Care participants. Lead-based paint inspections would also take place for any homeownership programs administered by HOME, CDBG, Alameda County Housing Trust Fund and Redevelopment funding. Each HOME jurisdiction also has its own lead-based paint inspection program and requirement that are in compliance with HUD regulations.

Starting in 2010, the City of Pleasanton began to routinely compile lead paint data for each new residential rehabilitation project processed through the Housing Rehabilitation Program (administered by Neighborhood Solutions), including assumed lead present, lead safe work practices followed, testing, abatement, and clearance test performed.

Actions planned to reduce the number of poverty-level families

The majority of programs that are aimed at addressing poverty are coordinated at the County level. For example, the Section 8 housing subsidy voucher program is coordinated in Pleasanton through the Housing Authority of Alameda County (HACA) and is an essential piece of the anti-poverty strategy countywide. In FY 2013, the City will continue to consider supporting requests by residents of subsidized housing complexes serving families, seniors, and the disabled to receive additional rent subsidies.

As described earlier, the City of Pleasanton, in collaboration with the City of Livermore and Abode Services (formerly Tri City Homeless Coalition), implemented a Housing Scholarship Program for Tri-Valley residents in FY 1999. The program was modeled on the City of Fremont's successful program. Administration of the program by Abode Services is being funded through City of Pleasanton funds and by other sources mobilized by Abode. Rent subsidies are being funded by each local jurisdiction using federal HOME funds. As noted in the preceding table, the City will apply City General Funds and Lower Income Housing Funds to provide case management services to program clients in FY 2013. Tenant rent subsidies will be provided using HOME funds.

In 1996, the City of Pleasanton established an Economic Vitality Committee (formerly known as the Economic Development Advisory Commission), or EVC, to promote economic development in Pleasanton. A new staff position of Economic Vitality Manager was created in 1994. This individual currently works to coordinate the efforts of the EVC, which works closely with the Pleasanton Chamber of Commerce and the Pleasanton Convention and Visitors Bureau to promote increased economic development and community job retention.

The City of Pleasanton has had a high degree of success in recent years attracting new retail commercial, office, and industrial development. Oracle recently completed a major five-story building as an addition to its existing campus in Hacienda Business Park. Kaiser Permanente plans a significant expansion to its Pleasanton campus in the near future. Southbay Development has begun the development of 500,000

sq. ft. of retail and office space at I-680 and Bernal Avenue, including a new Safeway store and ancillary retail space. Workday, a “software-as-a-service” company, recently located its corporate offices near the Stoneridge Mall. ValleyCare Medical Center has expanded its services and recently entered into agreements with UCSF and UC Davis for enhance pediatric and oncology care. The Walmart, Home Depot, and Rose Pavilion centers have drawn new businesses and created new employment opportunities for residents. The new West Dublin / Pleasanton BART station opened in early 2011. In general, the conditions for commercial, office, and industrial development in Pleasanton have been favorable relative to other areas. Due to its broad diversity and desirable location, the City has weathered the recent economic downturn better than other areas.

Actions planned to develop institutional structure

The City of Pleasanton created a Housing Specialist position in 1995. This staff position has the responsibility for coordinating a variety of housing related efforts that were formerly distributed among various City departments and contract agencies, including administration of the CDBG and HOME programs as well as local housing programs. This staffing change has significantly improved the City's ability to coordinate and deliver housing services during the past five years. A half-time intern position was added in 2003 (but has remained vacant since 2009 due to budget considerations).

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

The Human Services Commission also collaborates yearly with the City’s Housing Commission to conduct a joint review as part of the annual process of allocating CDBG funds. This collaborative effort, begun in 1996, has helped to improve the coordination of assistance to housing and services in the area and has helped to simplify the process of allocating funds to local non-profits, thereby improving service delivery.

In 2011, the cities of Pleasanton and Livermore collaborated to introduce a new electronic application system called ZoomGrants, and the City of Dublin joined the collaborative in 2012. Agencies submitted applications online, and the applications were also reviewed online by members of city commissions. Staff developed a survey to solicit feedback from agencies that had applied for HHSG funds. Reaction to the new online submission and review system was overwhelmingly positive and appears to be increasing administrative efficiency and optimizing the use of limited resources. The online system will also be used throughout the program year for reporting and monitoring purposes. The City will continue to monitor and refine the HHSG program to ensure that it fulfills the goal of fostering innovation in the design and delivery of services that meet the needs of low income and underserved populations.

In 1998, the City of Pleasanton joined with the City of Livermore and with Allied Housing (a nonprofit housing developer now known as “Abode Services”) to implement the Tri-Valley Housing Scholarship Program discussed earlier. This program, which is now administered by Abode Services, is part of a series of collaborative efforts that have improved the delivery of housing and services to Tri Valley residents.

The City of Pleasanton has continued to take a lead role in the activities of the Tri-Valley Affordable Housing Committee (TVAHC), which is made up of representatives of cities in the Livermore Amador

Valley area (Pleasanton, Livermore, Dublin, San Ramon, and Danville). The TVAHC has actively participated in annual outreach activities promoting public awareness of affordable housing in the Tri-Valley area, working with the East Bay Housing Organizations (EBHO). In addition, the TVAHC initiated the successful establishment of the Tri-Valley Housing Opportunity Center (TVHOC) which opened in 2005. The TVHOC serves as a “clearing house,” initially for ownership programs and ultimately for a continuum of housing assistance of different types in the Tri-Valley.

Discussion

The City of Pleasanton completed a comprehensive update to its General Plan in 2009. A revision to the Housing Element was completed in 2011 and certified by State HCD in 2012. With the revisions included in the most recent update (including a number of rezonings providing 70 acres of land for future high-density housing development), up-to-date housing policies will be in place in FY 2013 and subsequent years to guide City programs for affordability, preservation, discrimination, and other housing and community development issues. The City was an active participant with the Association of Bay Area Governments (ABAG) in the most recent establishment of updated housing affordability targets for the Bay Area region. These targets are incorporated into the current Housing Element and will be carried forward in the current update.

The City of Pleasanton will coordinate CDBG, HOME, and City funding sources, such as Lower Income Housing Funds and General Funds, to provide housing programs, public service assistance, capital improvement assistance, and economic development opportunities to the community during the next five years.

The City recently redesigned its grant programs into a single consolidated grant program called the Housing and Human Services Grant (HHSG). The HHSG program was developed in 2009 as a refinement and consolidation of four separate grant programs:

1. Federal Community Development Block Grant (CDBG) Funds
2. Federal HOME Investment Partnership Program (HOME) Funds
3. City Lower Income Housing Funds for Housing
4. City General Funds for Human Services (formerly “City Grant”)

The new HHSG program was introduced with the 2010 fiscal year. Based on the first year of implementation, the consolidation of these four funding sources into a single streamlined grant program has created greater efficiencies in the allocation of limited funding sources as well as the coordination and delivery of human services. While each source has specific priorities and requirements, there is an overarching priority for funding programs and services that benefit low income residents and for addressing gaps in housing and services.

CERTIFICATIONS

In accordance with the applicable statutes and the regulations governing the consolidated plan regulations, the jurisdiction certifies that:

Affirmatively Further Fair Housing -- The jurisdiction will affirmatively further fair housing, which means it will conduct an analysis of impediments to fair housing choice within the jurisdiction, take appropriate actions to overcome the effects of any impediments identified through that analysis, and maintain records reflecting that analysis and actions in this regard.

Anti-displacement and Relocation Plan -- It will comply with the acquisition and relocation requirements of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended, and implementing regulations at 49 CFR 24; and it has in effect and is following a residential anti-displacement and relocation assistance plan required under section 104(d) of the Housing and Community Development Act of 1974, as amended, in connection with any activity assisted with funding under the CDBG or HOME programs.

Drug Free Workplace -- It will or will continue to provide a drug-free workplace by:

1. Publishing a statement notifying employees that the unlawful manufacture, distribution, dispensing, possession, or use of a controlled substance is prohibited in the grantee's workplace and specifying the actions that will be taken against employees for violation of such prohibition;
2. Establishing an ongoing drug-free awareness program to inform employees about –
 - a) The dangers of drug abuse in the workplace;
 - b) The grantee's policy of maintaining a drug-free workplace;
 - c) Any available drug counseling, rehabilitation, and employee assistance programs; and
 - d) The penalties that may be imposed upon employees for drug abuse violations occurring in the workplace;
3. Making it a requirement that each employee to be engaged in the performance of the grant be given a copy of the statement required by paragraph 1;
4. Notifying the employee in the statement required by paragraph 1 that, as a condition of employment under the grant, the employee will –
 - a) Abide by the terms of the statement; and
 - b) Notify the employer in writing of his or her conviction for a violation of a criminal drug statute occurring in the workplace no later than five calendar days after such conviction;
5. Notifying the agency in writing, within ten calendar days after receiving notice under subparagraph 4(b) from an employee or otherwise receiving actual notice of such conviction. Employers of convicted employees must provide notice, including position title, to every grant officer or other designee on whose grant activity the convicted employee was working, unless the Federal agency has designated a central point for the receipt of such notices. Notice shall include the identification number(s) of each affected grant;
6. Taking one of the following actions, within 30 calendar days of receiving notice under subparagraph 4(b), with respect to any employee who is so convicted:
 - a) Taking appropriate personnel action against such an employee, up to and including termination, consistent with the requirements of the Rehabilitation Act of 1973, as amended; or

- b) Requiring such employee to participate satisfactorily in a drug abuse assistance or rehabilitation program approved for such purposes by a Federal, State, or local health, law enforcement, or other appropriate agency;
- 7. Making a good faith effort to continue to maintain a drug-free workplace through implementation of paragraphs 1, 2, 3, 4, 5 and 6.

Anti-Lobbying -- To the best of the jurisdiction's knowledge and belief:

- 1. No Federal appropriated funds have been paid or will be paid, by or on behalf of it, to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with the awarding of any Federal contract, the making of any Federal grant, the making of any Federal loan, the entering into of any cooperative agreement, and the extension, continuation, renewal, amendment, or modification of any Federal contract, grant, loan, or cooperative agreement;
- 2. If any funds other than Federal appropriated funds have been paid or will be paid to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with this Federal contract, grant, loan, or cooperative agreement, it will complete and submit Standard Form-LLL, "Disclosure Form to Report Lobbying," in accordance with its instructions; and
- 3. It will require that the language of paragraph 1 and 2 of this anti-lobbying certification be included in the award documents for all subawards at all tiers (including subcontracts, subgrants, and contracts under grants, loans, and cooperative agreements) and that all subrecipients shall certify and disclose accordingly.

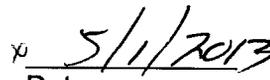
Authority of Jurisdiction -- The consolidated plan is authorized under State and local law (as applicable) and the jurisdiction possesses the legal authority to carry out the programs for which it is seeking funding, in accordance with applicable HUD regulations.

Consistency with Plan -- The housing activities to be undertaken with CDBG, HOME, ESG, and HOPWA funds are consistent with the strategic plan.

Section 3 -- It will comply with section 3 of the Housing and Urban Development Act of 1968, and implementing regulations at 24 CFR Part 135.



Signature/Authorized Official
Steven Bocian



Date

Assistant City Manager
Title

Specific CDBG Certifications

The Entitlement Community certifies that:

Citizen Participation -- It is in full compliance and following a detailed citizen participation plan that satisfies the requirements of 24 CFR 91.105.

Community Development Plan -- Its consolidated housing and community development plan identifies community development and housing needs and specifies both short-term and long-term community development objectives that provide decent housing, expand economic opportunities primarily for persons of low and moderate income. (See CFR 24 570.2 and CFR 24 part 570)

Following a Plan -- It is following a current consolidated plan (or Comprehensive Housing Affordability Strategy) that has been approved by HUD.

Use of Funds -- It has complied with the following criteria:

1. **Maximum Feasible Priority.** With respect to activities expected to be assisted with CDBG funds, it certifies that it has developed its Action Plan so as to give maximum feasible priority to activities which benefit low and moderate income families or aid in the prevention or elimination of slums or blight. The Action Plan may also include activities which the grantee certifies are designed to meet other community development needs having a particular urgency because existing conditions pose a serious and immediate threat to the health or welfare of the community, and other financial resources are not available);

2. **Overall Benefit.** The aggregate use of CDBG funds including section 108 guaranteed loans during program years **2011, 2012, 2013** shall principally benefit persons of low and moderate income in a manner that ensures that at least 70 percent of the amount is expended for activities that benefit such persons during the designated period;

3. **Special Assessments.** It will not attempt to recover any capital costs of public improvements assisted with CDBG funds including Section 108 loan guaranteed funds by assessing any amount against properties owned and occupied by persons of low and moderate income, including any fee charged or assessment made as a condition of obtaining access to such public improvements. However, if CDBG funds are used to pay the proportion of a fee or assessment that relates to the capital costs of public improvements (assisted in part with CDBG funds) financed from other revenue sources, an assessment or charge may be made against the property with respect to the public improvements financed by a source other than CDBG funds.

The jurisdiction will not attempt to recover any capital costs of public improvements assisted with CDBG funds, including Section 108, unless CDBG funds are used to pay the proportion of fee or assessment attributable to the capital costs of public improvements financed from other revenue sources. In this case, an assessment or charge may be made against the property with respect to the public improvements financed by a source other than CDBG funds. Also, in the case of properties owned and occupied by moderate-income (not low-income) families, an assessment or charge may be made against the property for public improvements financed by a source other than CDBG funds if the jurisdiction certifies that it lacks CDBG funds to cover the assessment.

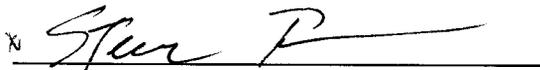
Excessive Force -- It has adopted and is enforcing:

1. A policy prohibiting the use of excessive force by law enforcement agencies within its jurisdiction against any individuals engaged in non-violent civil rights demonstrations; and
2. A policy of enforcing applicable State and local laws against physically barring entrance to or exit from a facility or location which is the subject of such non-violent civil rights demonstrations within its jurisdiction;

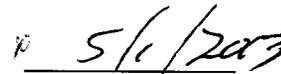
Compliance With Anti-discrimination laws -- The grant will be conducted and administered in conformity with title VI of the Civil Rights Act of 1964 (42 USC 2000d), the Fair Housing Act (42 USC 3601-3619), and implementing regulations.

Lead-Based Paint -- Its activities concerning lead-based paint will comply with the requirements of 24 CFR Part 35, subparts A, B, J, K and R;

Compliance with Laws -- It will comply with applicable laws.



Signature/Authorized Official
Steven Bocian



Date

Assistant City Manager
Title

Specific HOME Certifications

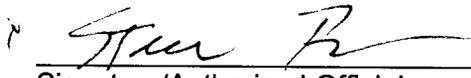
The HOME participating jurisdiction certifies that:

Tenant Based Rental Assistance -- If the participating jurisdiction intends to provide tenant-based rental assistance:

The use of HOME funds for tenant-based rental assistance is an essential element of the participating jurisdiction's consolidated plan for expanding the supply, affordability, and availability of decent, safe, sanitary, and affordable housing.

Eligible Activities and Costs -- it is using and will use HOME funds for eligible activities and costs, as described in 24 CFR § 92.205 through 92.209 and that it is not using and will not use HOME funds for prohibited activities, as described in § 92.214.

Appropriate Financial Assistance -- before committing any funds to a project, it will evaluate the project in accordance with the guidelines that it adopts for this purpose and will not invest any more HOME funds in combination with other Federal assistance than is necessary to provide affordable housing.



Signature/Authorized Official
Steven Bocian



Date

Assistant City Manager
Title

APPENDIX TO CERTIFICATIONS

INSTRUCTIONS CONCERNING LOBBYING AND DRUG-FREE WORKPLACE REQUIREMENTS:

A. Lobbying Certification

This certification is a material representation of fact upon which reliance was placed when this transaction was made or entered into. Submission of this certification is a prerequisite for making or entering into this transaction imposed by section 1352, title 31, U.S. Code. Any person who fails to file the required certification shall be subject to a civil penalty of not less than \$10,000 and not more than \$100,000 for each such failure.

B. Drug-Free Workplace Certification

1. By signing and/or submitting this application or grant agreement, the grantee is providing the certification.
2. The certification is a material representation of fact upon which reliance is placed when the agency awards the grant. If it is later determined that the grantee knowingly rendered a false certification, or otherwise violates the requirements of the Drug-Free Workplace Act, HUD, in addition to any other remedies available to the Federal Government, may take action authorized under the Drug-Free Workplace Act.
3. Workplaces under grants, for grantees other than individuals, need not be identified on the certification. If known, they may be identified in the grant application. If the grantee does not identify the workplaces at the time of application, or upon award, if there is no application, the grantee must keep the identity of the workplace(s) on file in its office and make the information available for Federal inspection. Failure to identify all known workplaces constitutes a violation of the grantee's drug-free workplace requirements.
4. Workplace identifications must include the actual address of buildings (or parts of buildings) or other sites where work under the grant takes place. Categorical descriptions may be used (e.g., all vehicles of a mass transit authority or State highway department while in operation, State employees in each local unemployment office, performers in concert halls or radio stations).
5. If the workplace identified to the agency changes during the performance of the grant, the grantee shall inform the agency of the change(s), if it previously identified the workplaces in question (see paragraph three).
6. The grantee may insert in the space provided below the site(s) for the performance of work done in connection with the specific grant: Place of Performance (Street address, city, county, state, zip code):

City of Pleasanton Offices
123 Main Street / 200 Old Bernal Ave.
Pleasanton, Alameda County, CA 94566

Check ___ if there are workplaces on file that are not identified here.

The certification with regard to the drug-free workplace is required by 24 CFR part 24, subpart F.

7. Definitions of terms in the Nonprocurement Suspension and Debarment common rule and Drug-Free Workplace common rule apply to this certification. Grantees' attention is called, in particular, to the following definitions from these rules:

"Controlled substance" means a controlled substance in Schedules I through V of the Controlled Substances Act (21 U.S.C. 812) and as further defined by regulation (21 CFR 1308.11 through 1308.15);

"Conviction" means a finding of guilt (including a plea of nolo contendere) or imposition of sentence, or both, by any judicial body charged with the responsibility to determine violations of the Federal or State criminal drug statutes; "Criminal drug statute" means a Federal or non-Federal criminal statute involving the manufacture, distribution, dispensing, use, or possession of any controlled substance;

"Employee" means the employee of a grantee directly engaged in the performance of work under a grant, including: (i) All "direct charge" employees; (ii) all "indirect charge" employees unless their impact or involvement is insignificant to the performance of the grant; and (iii) temporary personnel and consultants who are directly engaged in the performance of work under the grant and who are on the grantee's payroll. This definition does not include workers not on the payroll of the grantee (e.g., volunteers, even if used to meet a matching requirement; consultants or independent contractors not on the grantee's payroll; or employees of subrecipients or subcontractors in covered workplaces).

Program Specific Requirements

AP-90 Program Specific Requirements

Introduction

The allocation of CDBG funds received by the City of Pleasanton is relatively small. Only one activity (the Housing Rehabilitation Program) generates program income. The City does not anticipate any income from Section 108 loan proceeds or urban renewal settlements and does not plan to return any grant funds to the line of credit for uses not included in a prior statement or plan.

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	1,000
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:	1,000

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.	95.00%

Discussion

Program income, which comes from repayment of past / deferred homeowner rehab loans, is sporadic and unpredictable and is estimated at approximately \$20,000 per year. However, this year (FY 2012), actual program income has been less than \$1,000.