



MEMORANDUM

Date: September 10, 2025

To: Mayor and City Council

From: Gerry Beaudin, City Manager 

Subject: **Technical Amendments to the FY2025-2029 Consolidated Plan and FY2025-2026 Action Plan**

On August 15, 2025, as required by the U.S. Department of Housing and Urban Development (HUD), the City submitted its FY2025-2029 Consolidated Plan, which includes the FY2025-2026 Action Plan. The Consolidated Plan, which is a five-year planning document, describes the City's goals and objectives related to housing and community development while the Action Plan formalizes how Pleasanton will be utilizing its federal Community Development Block Grant (CDBG) and HOME Investment Partnerships Program (HOME) allocation funds to address the City's community development needs for its low-income residents in FY2025/26.

Following HUD's review, the City received notice on September 5, 2025, identifying language in the Consolidated Plan/Action Plan that HUD determined may be inconsistent with recent Executive Orders (EOs 14151 and 14713) relating to diversity, equity, and inclusion. However, HUD did also confirm that Pleasanton's FY 2025 Consolidated Plan/Action Plan will continue to be processed under a Third Preliminary Injunction Order in *Martin Luther King, Jr. County v. Turner, et al.*, 2:25-cv-814-BJR (W.D. Wash.), ECF No. 338 (August 12, 2025) issued by the U.S. District Court for the Western District of Washington.

Still, HUD has directed Pleasanton to amend references in the Consolidated Plan/Action Plan that are potentially inconsistent with the Executive Orders. The affected language in the narrative sections of the Consolidated Plan, which do not affect funding levels, priorities, or program activities, that has been identified is below:

- **Page 7:** The 5-year strategic initiative Home Together 2026 Community Plan centers on racial equity and identifies the strategies, activities, and resources needed to dramatically reduce homelessness in Alameda County. The Plan identifies what is needed to operate a homeless response system that has the capacity to address the needs of people experiencing homelessness and to reduce racial disparities. A companion to the Home Together Community Plan is the Alameda County's Homelessness Prevention Framework which outlines the actions and resources needed to significantly prevent homelessness in Alameda County.

To address HUD's comments, staff will make the following technical revisions that will remove reference to "racial equity" or "racial disparities".

- **Page 7:** The 5-year strategic initiative Home Together 2026 Community Plan ~~centers on racial equity and~~ identifies the strategies, activities, and resources needed to dramatically reduce homelessness in Alameda County. The Plan identifies what is needed to operate a homeless response system that has the capacity to address the needs of people experiencing homelessness ~~and to reduce racial disparities~~. A companion to the Home Together Community Plan is the Alameda County's Homelessness Prevention Framework which outlines the actions and resources needed to significantly prevent homelessness in Alameda County.

These revisions do not change program objectives, funding, or priorities for the City. These revisions are also considered technical amendments under HUD regulations 24 CFR Part 91 and in accordance with the City of Pleasanton's HUD-approved Citizen Participation Plan. Consequently, they do not constitute a substantial amendment to the Consolidated Plan/Action Plan and do not require additional City Council action. The omission is limited to the federally submitted Consolidated Plan narrative and does not alter the City's partnerships, data collection practices, or service delivery. Additionally, the City Attorney confirmed that the revisions are acceptable since there is no added language for additional restrictions or conditions.

City staff have made the requested revisions and now await HUD to complete its review of the Consolidated Plan/Action Plan. City staff anticipate HUD will complete its review by the end of September. Upon approval of the City's Consolidated Plan/Action Plan, City staff anticipate receiving the Grant Agreement for funding for its \$381,455 CDBG allocation for FY 2025/26 at the end of October. While there exist valid concerns about the current administration, HUD's FY2025 budget has been enacted, and HUD has already announced the approved funding allocation for CDBG-entitlement jurisdictions, including Pleasanton, for fiscal year 2025-2026.

Please contact me if you have any questions.