

DRAFT Action Plan FY 2024-2025



Alameda County HOME Consortium

Public Review Period: April 1 – May 1, 2024

Executive Summary

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

1. Introduction

The Annual Action Plan includes a listing of projects and activities to be funded with CDBG funds during FY 2024/25 as well as an annual assessment of the City's progress toward meeting its goals for housing and community development. Pleasanton is anticipated to receive approximately \$380,348 in federal CDBG funds for federal Fiscal Year 2024. This CDBG funding amount is a projection as the U.S. Department of Housing & Urban Development (HUD) has yet to provide the City with its CDBG funding allocation for FY 2024/25. The projected funding amount is a conservative estimate based on last year's funding allocation due to delays at the federal budget level. The CDBG funding available for FY 2024/25 also includes \$130,564 of Program Income that the City received from CDBG-funded housing rehabilitation loans that have been repaid. The City will also allocate \$366,374 in local Lower Income Housing Funds (LIHF) and \$257,864 in local General Funds to supplement funding for several housing projects and services which sought funds under the CDBG program funding allocation process.

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 the FY 2024/25 Housing and Human Services Grants Program (see Table A on next page) which will fund 28 different programs and projects.

The City is re-programming \$195,483 CDBG funds that was previously allocated in FY 2022/23 to the Axis Community Health dental site project, which has been canceled. These funds will instead be put towards the \$250,000 CDBG funds for the Tri-Valley Haven Emergency Shelter Rebuild project. \$23,804 in CDBG funds will be allocated to the City's annual Section 108 Loan Repayment in accordance with HUD's 20-year repayment plan. \$76,636 in CDBG funds will fund two public service programs providing meals to low income seniors (Open Heart Kitchen Senior Meals Program and Spectrum Community Services Meals on Wheels Program).

All FY 2024/25 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.

2. Summarize the objectives and outcomes identified in the Plan

This could be a restatement of items or a table listed elsewhere in the plan or a reference to another location. It may also contain any essential items from the housing and homeless needs assessment, the housing market analysis or the strategic plan.

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 2020 through 2024 (FY 2020-24 Consolidated Plan).

The City of Pleasanton's Five-Year Strategic Plan includes the following priorities:

Priority 1: Housing Needs

Goal 1: Promote the production, rehabilitation and preservation of affordable housing (rental and ownership) through acquisition, rehabilitation, new construction and minor home repair.

Goal 2: Reduction of Housing Discrimination through provision of fair housing and landlord/tenant services.

Priority 2: Homeless Needs

Goal 1: Use resources to end homelessness by funding and supporting homeless services programs.

Priority 3: Supportive Housing Needs

Goal 1: Increase the availability of service enriched housing for persons with special needs by supporting the acquisition and new construction of housing units.

Priority 4: Community Development Needs

Goal 1: Make improvements, including ADA accessibility, to public facilities, such as curbs and sidewalks, neighborhood parks and recreational improvements, homeless facilities and other public facilities/community centers.

Goal 2: Fund economic development, micro-enterprise and on-the-job training.

Goal 3: Support public service programs for low income residents, preserving safety net services for families and individuals who are vulnerable or "in-crisis".

Pleasanton has provided tenant-based rental assistance since 1999 using HOME funds for rental subsidies and local funds for case management services. In FY 2024/25, Abode Services will continue to assist households who are homeless or at risk through the Tri-Valley Rapid Rehousing Program. The City will be allocating its HOME allocation for FY 2024/25 to the rental subsidies provided by the Rapid Rehousing Program. The City will utilize local HHSG funds in FY 2024/25 to provide counseling and case management services provided by CRIL for households with special needs.

The Section 8 certificate and voucher program is currently coordinated through the Housing Authority of the County of Alameda (HACA). The City coordinates with HACA to promote the inclusion of Section 8

vouchers holders by local landlords through annual outreach and an educational workshop. There are 50 Project-Based Section 8 vouchers at Kottinger Gardens Phase II.

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 2022/23 that was produced by the Alameda County HOME Consortium. This document is available for review at the City of Pleasanton offices or its website at <https://www.cityofpleasantonca.gov/our-government/housing/community-development-block-grant/>.

3. Evaluation of past performance

This is an evaluation of past performance that helped lead the grantee to choose its goals or projects.

An evaluation of FY 2022/23 activities was developed for public comment in August 2023. The CAPER for FY 2023/24 will be completed in September 2024.

4. Summary of Citizen Participation Process and consultation process

Summary from citizen participation section of plan.

The City held a joint HHSO grant application virtual workshop via Zoom in collaboration with the cities of Livermore and Dublin on December 6, 2023. Notices regarding the virtual workshop were sent via email directly to the agencies and persons in an "interest list" database, and notices were also published in the key local newspapers and on city web sites prior to the workshop. HHSO grant applications were reviewed in two public meetings held at the March 6th, 2024 Human Services Commission meeting and at the March 21st, 2024 Housing Commission meeting.

The April 16th, 2024 City Council was noticed in a newspaper of general circulation (*The Valley Times*) 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 was posted on the City's website for public review and upon request. A 30-day public review period, which is being coordinated by Alameda County HOME Consortium, commenced on April 1st and will end on May 1st, 2024.

5. Summary of public comments

This could be a brief narrative summary or reference an attached document from the Citizen Participation section of the Con Plan.

The City will be soliciting public comments on the Draft FY 2024/2025 Action Plan for 30 days from April 1, 2024 through May 1, 2024.

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

Not applicable.

7. Summary

The City has proposed allocating its available CDBG funds, as well as City General Funds and Low Income Housing Funds, to activities and projects, described above, in order to address the City's housing and community development needs.

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

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	
CDBG Administrator	PLEASANTON	City Manager / Housing Division
HOPWA Administrator		
HOME Administrator		
HOPWA-C Administrator		

Table 1 – Responsible Agencies

Narrative

The Consolidated Plan is prepared by the City's Housing Manager who reports directly to Director of the Community Development Department. The Housing Manager is also responsible for administering the CDBG program and is the liaison to the County of Alameda for matters related to the HOME program as the City of Pleasanton is a member of the Alameda County HOME Consortium.

Consolidated Plan Public Contact Information

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AP-10 Consultation - 91.100, 91.200(b), 91.215(l)

1. Introduction

The Consolidated Plan and Action Plan is an important document for the HOME Consortium. Built on interagency coordination, consultation, and public participation, the Consolidated Plan focuses attention on housing and community development needs and resources available to meet these needs.

The DRAFT FY 2024/25 Action Plan was prepared through consultation with other public and private entities. At the countywide level, the HOME Consortium Technical Advisory Committee (HOMETAC), composed of staff from all jurisdictions in the HOME Consortium, meet bi-monthly to provide policy input into the Action Plan planning process. Additional countywide consultation efforts are discussed in detail in the Alameda County section of the Consolidated Plan, which is an important document for the HOME Consortium. This Action Plan implements the Consolidated Plan priorities.

Funding priorities are reviewed through two City commissions in addition to publication throughout the community and public hearing by City Council. The City commissions review process for the application review, funding recommendation and award are summarized as follows:

- The City's Human Services Commission (HSC) is appointed by the City Council and holds public meetings monthly on the first Wednesday of the month. The HSC provides the main public forum for discussion of a range of issues related to public services in Pleasanton and the Tri-Valley region. Of specific relevance to the FY 2024/25 Housing and Human Services Grants (HHSO) Program, various meetings were held. In collaboration and coordination with the cities of Dublin and Livermore, City staff held a virtual meeting on December 6, 2023 to discuss the priorities for the upcoming Housing and Human Services Grant (HHSO) process. The HSC held an in-person meeting on February 7, 2024 to discuss the process for reviewing and evaluating applications for HHSO funding. The HSC then held another in-person meeting on March 6, 2024 to recommend HHSO funding for projects that would be included in the next Action Plan.
- The City's Housing Commission (HC) is also appointed by the City Council and holds public meetings monthly on the third Thursday of the month. The HC is similar to the HSC but focuses on housing-related projects and issues. At its March 21, 2024 in-person public meeting, the HC developed a recommendation for HHSO funding for housing-related projects and programs to be included in the next Action Plan.
- The City Council serves as the highest level decision making body for all matters related to the Consolidated Plan. The Council holds public meetings twice a month on the first and third Tuesday of the month. On April 16, 2024, City Council will hold an in-person public hearing and approve recommendations for HHSO funding from the HSC and HC for projects to be included in the next Action Plan. At the same meeting, the Council will take action to approve the proposed Action Plan for FY 2024/2025 for submittal to HUD.

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

EveryOne Home is a collective impact initiative founded in 2007 to facilitate the implementation of Alameda County, California’s plan to end homelessness, known as the EveryOne Home Plan. In 2018, EveryOne Home updated that Plan now known as the Strategic Plan Update: Ending Homelessness in Alameda County. The Strategic Update recommends actions aimed at reducing homelessness by 1) preventing homelessness; 2) ensuring safer and more dignified conditions for those experiencing homelessness; and 3) increasing permanent homes.

The EveryOne Home Governance Charter memorializes how stakeholders govern the collective impact initiative to end homelessness and meet the federally-defined responsibilities of operating a HUD Continuum of Care as found in the Continuum of Care Program Rule at §578. In fulfillment of those agreements EveryOne Home convenes stakeholders, develops policies for the housing crisis response system, and tracks outcomes through the following committees: EveryOne Home Membership, Leadership Board, Results Based Accountability, HUD CoC Committee, HMIS Oversight Committee, System Coordination Committee, and Youth Action Board. Stakeholders include people with lived experience of homelessness, elected officials, advocacy groups, and service providers as well as county and city government administrators.

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

Stakeholders in Alameda County have been assessing the needs of persons experiencing homelessness and working to improve our response across the county since the founding of Alameda County-wide Homeless Continuum of Care Council in 1997. The collaboration includes cities and Alameda County government agencies representing multiple systems of care that share overlapping client populations, including but not limited to homelessness services, HIV/AIDS services, behavioral health services, foster care, veteran’s services, health care services, and probation/parole.

Alameda Countywide Homeless and Special Needs Housing Plan, now known as the EveryOne Home plan, helped to form EveryOne Home into a community-based organization to implement the Plan and was previously serving as the County’s Continuum of Care. The EveryOne Home plan is structured around three major goals: 1) preventing homelessness; 2) ensuring safer and more dignified conditions for those experiencing homelessness; and 3) increasing permanent homes.

In 2019-2020, the CoC conducted a systemwide needs analysis with a racial equity focus, then used that analysis in 2021 to develop the Home Together Community Plan (Plan). The Plan, relying on the extensive needs analysis (system modeling) to predict changes in homelessness over time, calls for

significant increases in homelessness prevention, subsidized housing, interim housing (shelter) and direct services over five years to meet the needs of people experiencing or at risk of homelessness in Alameda County. Building from the Centering Racial Equity in Homeless System Design report (released in 2021), the Plan calls for centering racial equity through focused work to reduce the racial disparities that shape homelessness in Alameda County and across the nation, including adding housing resources that more equitably address the conditions leading to disproportionate rates of homelessness among Black, Indigenous, and other people of color (or BIPOC).

For each year of the Plan, data will be collected in the following areas in order to analyze progress towards the Home Together goals and to inform strategic planning for Alameda County's homelessness response system:

- Funding and investments
- System Inventory
- Home Together strategies and activities
- Key service and outcome measures

The CoC coordinates local efforts to address homelessness, seeking to maintain the existing service capacity, establish inter-jurisdictional cooperation, and build new partnerships that generate greater resources for the continuum of housing and support services. EveryOne Home leverages substantial federal, state, and local resources for homeless housing and services, standardize data collection, and facilitate a year-round process of collaboration. EveryOne Home includes representation from HOME Consortium jurisdictions and CDBG entitlement jurisdictions in the County, service providers and advocates, homeless or formerly homeless persons, representatives of the faith community, business representatives, and education and health care professionals.

Describe consultation 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

The CoC Results Based Accountability (RBA) Committee developed system level and program level performance measures in 2017, and in 2018 the RBA Committee benchmarked those outcomes and set performance targets. These measures and targets appear in county and city contracts for homeless services and are also available as a CoC Practitioner Scorecard on the EveryOne Home website. This scorecard is updated every quarter on the Federal Fiscal year cycle to support system monitoring of projects supported with ESG funds. Alameda County Housing and Community Development Department supports CoC initiatives to measure and evaluate performance by administering the HMIS and as a founding member of the CoC Results Based Accountability Committee.

In 2022, to better center race equity, utilize additional data sources besides HMIS data, and cover indicators of most importance and interest the scorecard was revised. The new scorecard has 13 indicators that will now be disaggregated by race/ethnicity (whereas in the past there were none), has added measures to monitor coordinated entry, and includes additional data from 211 and census data.

The CoC utilizes the HUD system wide performance outcome measures for evaluating ESG funded projects. The Results Based Accountability committee developed system performance outcomes into measures for each component of the Housing Crisis Response System, including those funded by ESG such as outreach, shelter and RRH. The Committee also developed measures for data quality and service quality as well as outcomes. All jurisdictions within Alameda County administering local and federal funds including ESG incorporate these new measures into funding contracts. For more information see: <http://www.everyonehome.org/measuring-success.html>. All providers receiving ESG funds will be contractually expected to meet or exceed performance standards.

The CoC will seat a new committee this year, the System Impact Committee, that will take the place of the RBA Committee. The aim is to develop more in depth and comprehensive system-wide data monitoring tools that track outcomes in the Home Together Plan and other new committees that will be seated soon including the Housing Capacity Committee and the Youth Committee.

CoC partners developed county-wide system standards to be implemented with related program funding including Emergency Solutions Grant funds. The standards for assistance have been updated to incorporate the use of the new assessment scoring tool and continuous prioritization. In addition, Alameda County adopted standards for the operation of emergency shelters and all shelters funded with County general funds and ESG funds are expected to comply with those standards. Those standards include accepting persons referred by coordinated entry with no sobriety or income requirements for receiving ESG assistance.

The CoC's HMIS Committee and Workgroup works closely with the Homeless Management Information System (HMIS) Lead. The Committee collaborates with the HMIS Lead to update policies and procedures related to HMIS operations, including a Privacy Plan, Security Plan, and Data Quality Plan. On an annual basis, the HMIS Committee completes a monitoring process of the HMIS Lead to support ongoing quality improvements. The work of the Committee includes developing recommendations for changes to the HMIS database, reviewing system-level data reports, and implementing the Data Quality Plan.

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

Table 2 – Agencies, groups, organizations who participated

1	Agency/Group/Organization	Abode Services, Inc.
	Agency/Group/Organization Type	Housing Services - Housing
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Homelessness Strategy Non-Homeless Special Needs
	Briefly describe how the Agency/Group/Organization was consulted. 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.
2	Agency/Group/Organization	Axis Community Health
	Agency/Group/Organization Type	Services-Health Health Agency
	What section of the Plan was addressed by Consultation?	Non-Homeless Special Needs
	Briefly describe how the Agency/Group/Organization was consulted. 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.
3	Agency/Group/Organization	Community Resources for Independent Living
	Agency/Group/Organization Type	Housing Services-Persons with Disabilities
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Non-Homeless Special Needs
	Briefly describe how the Agency/Group/Organization was consulted. 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.

4	Agency/Group/Organization	EDEN COUNCIL FOR HOPE AND OPPORTUNITY
	Agency/Group/Organization Type	Housing Services - Housing Services-homeless Service-Fair Housing
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Homeless Needs - Chronically homeless Homeless Needs - Families with children
	Briefly describe how the Agency/Group/Organization was consulted. 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.
5	Agency/Group/Organization	EDEN I&R
	Agency/Group/Organization Type	Housing Services-homeless Information and Referral
	What section of the Plan was addressed by Consultation?	Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Non-Homeless Special Needs
	Briefly describe how the Agency/Group/Organization was consulted. 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.

6	Agency/Group/Organization	LEGAL ASSISTANCE FOR SENIORS
	Agency/Group/Organization Type	Services-Elderly Persons
	What section of the Plan was addressed by Consultation?	Non-Homeless Special Needs
	Briefly describe how the Agency/Group/Organization was consulted. 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.
7	Agency/Group/Organization	OPEN HEART KITCHEN
	Agency/Group/Organization Type	Meals for children and seniors
	What section of the Plan was addressed by Consultation?	Anti-poverty Strategy
	Briefly describe how the Agency/Group/Organization was consulted. 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.
8	Agency/Group/Organization	SPECTRUM COMMUNITY SERVICES
	Agency/Group/Organization Type	Services-Elderly Persons Meals for homebound seniors
	What section of the Plan was addressed by Consultation?	Anti-poverty Strategy
	Briefly describe how the Agency/Group/Organization was consulted. 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.

9	Agency/Group/Organization	Tri-Valley Haven for Women
	Agency/Group/Organization Type	Housing Services - Housing Services-Children Services-Victims of Domestic Violence Services-homeless
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Homeless Needs - Families with children Non-Homeless Special Needs
	Briefly describe how the Agency/Group/Organization was consulted. 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.
10	Agency/Group/Organization	City of Pleasanton Human Services Commission
	Agency/Group/Organization Type	Other government - Local
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Non-Homeless Special Needs
	Briefly describe how the Agency/Group/Organization was consulted. 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. Provided funding recommendations to Pleasanton City Council.

11	Agency/Group/Organization	Housing Commission, City of Pleasanton
	Agency/Group/Organization Type	Other government - Local
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Non-Homeless Special Needs
	Briefly describe how the Agency/Group/Organization was consulted. 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. Provided funding recommendations to Pleasanton City Council.

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

No agency types were excluded from consultation as efforts were made to reach out and include as a broad a group of community stakeholders as much as possible.

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

City staff meet regularly with city staff from Dublin and Livermore to collaborate on how best to assist service providers in the Tri-Valley.

AP-12 Participation - 91.401, 91.105, 91.200(c)

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

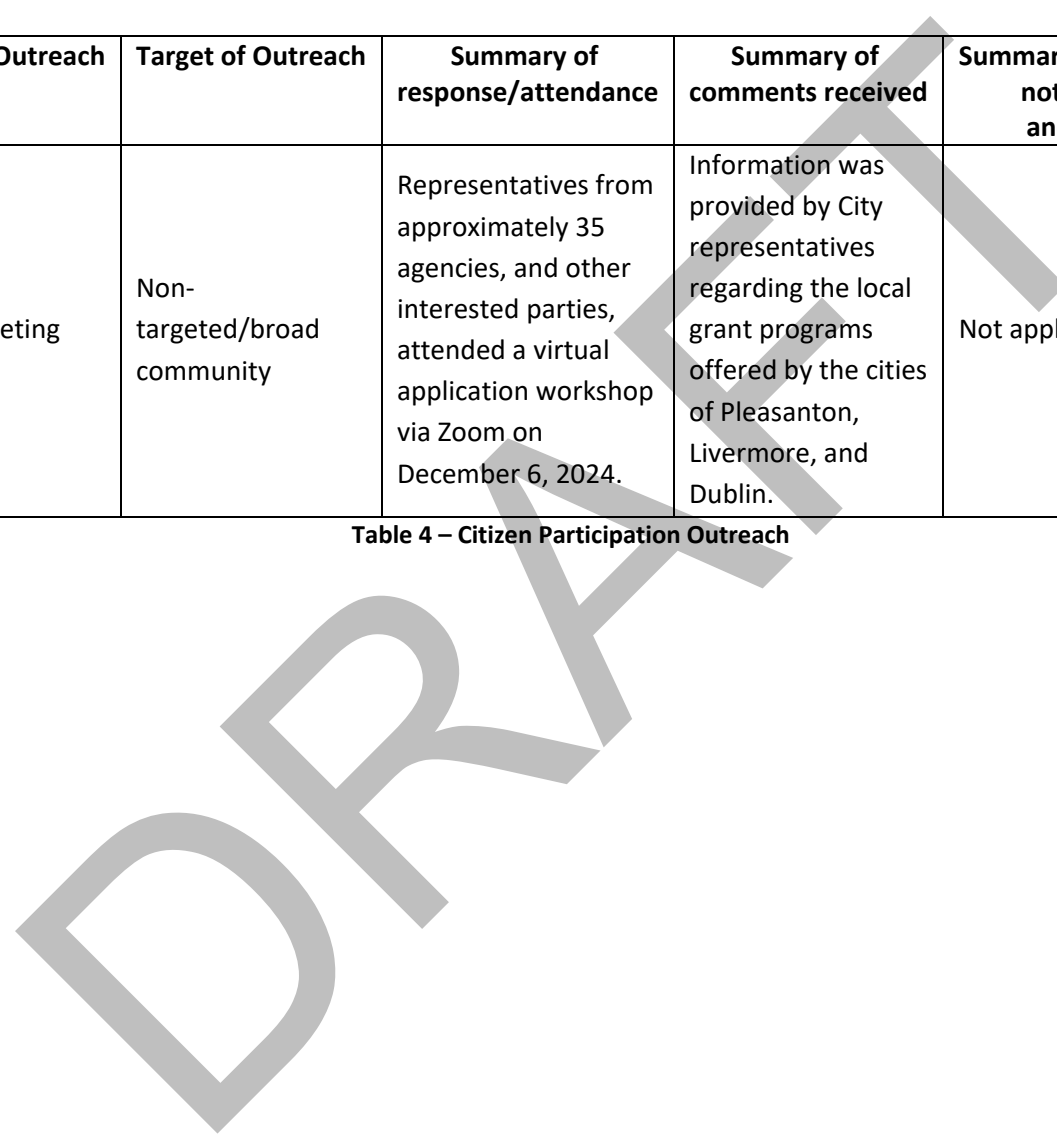
The City maintains (in collaboration with our neighbor cities of Livermore and Dublin) an on-going data base of approximately 250 nonprofit agencies and other parties that have expressed an interest in the Housing and Human Services Grant (HHSG) program (which serves as the local umbrella program for allocating federal CDBG and HOME funds). The City held one joint virtual application workshop via Zoom in collaboration with the cities of Livermore and Dublin on December 6, 2023. Notices regarding the workshops were emailed directly to agencies and persons in the aforementioned database, and notices were also published in the key local newspapers and on city websites prior to the workshop. At the virtual workshop, staff from each city discussed all aspects of the HHSG program, including city-specific policies and procedures.

HHSG applicants attended in-person public meetings, which were also livestreamed on YouTube, before either the Pleasanton Human Services Commission (March 6, 2024) or the Pleasanton Housing Commission (March 21, 2024) for funding consideration and recommendation. The Commissions considered the applications and formulated funding recommendations for consideration by the Pleasanton City Council. The funding recommendations will be reviewed for approval by the Pleasanton City Council in a public hearing on April 16, 2024, at which time the FY 2024/2025 Action Plan would also be approved for submittal to HUD. All City Council meeting was noticed in the *The Valley Times*, a newspaper of general circulation. 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 as well as on the City's website for public review. A 30-day public review period to solicit public comments on the Draft FY 2024/2025 Action Plan, coordinated by Alameda County HOME Consortium, commenced on April 1st, 2024 and will end on May 1st, 2024.

Citizen Participation Outreach

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (if applicable)
1	Public Meeting	Non-targeted/broad community	Representatives from approximately 35 agencies, and other interested parties, attended a virtual application workshop via Zoom on December 6, 2024.	Information was provided by City representatives regarding the local grant programs offered by the cities of Pleasanton, Livermore, and Dublin.	Not applicable.	

Table 4 – Citizen Participation Outreach



Expected Resources

AP-15 Expected Resources - 91.420(b), 91.220(c)(1,2)

Introduction

This section provides a brief description of the federal CDBG and HOME funds available to implement the City's FY 2024/2025 Annual Action

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Plan, which outlines the fifth and final year of the FY 2020-2024 Consolidated Plan.

Anticipated Resources

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 5				Expected Amount Available Remainder 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	380,348	130,564	380,367	891,550	0	<p>Pleasanton is anticipating to receive \$380,348 in CDBG funds for FY 2024/25.</p> <p>The City received \$130,564 in Program Income from CDBG-funded housing rehabilitation loans that have been repaid.</p> <p>The City has \$380,367 CDBG funds available to commit to CDBG-eligible activities. These are funds from prior fiscal years (\$212,716 in FY 2021/22 and \$167,920 in FY 2022/23), which includes \$195,483 allocated in FY 2022/23 to the Axis Community Health New Dental Site project. This project has been canceled, and CDBG funds will be reprogrammed to other CDBG-eligible capital improvement projects.</p>

Table 5 - 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

To maximize leveraging of its own funds and increase the funds available for housing and community development activities, the City of Pleasanton plans to undertake the following activities:

- Support applications by organizations or agencies for other public and private sources of financing to leverage City funds.
- Include leveraging as a goal to the maximum extent possible in the City's HHS funding application review process.
- Support the acquisition and rehabilitation of existing and new construction of units by nonprofit housing developers.
- Promote private sector rehabilitation through the City's Housing Rehabilitation Program in collaboration with Habitat for Humanity.
- Continue to provide support to affordable housing developers and non-profit service providers in obtaining other sources of financing.
- Promote joint development with other governmental/quasi-governmental agencies to implement housing community development programs and combine multiple sources of financing.

Matching requirements must be satisfied in the following federal entitlement housing programs: the HOME Program and the Emergency Solutions Grant Program. A variety of non-federal sources may be used for the HOME match requirements, which requires that \$0.25 be "permanently contributed" to the HOME Program or to HOME-assisted projects for every HOME dollar spent. This requirement applies to the program as a whole, not to individual projects. The liability for matching funds occurs when the HOME Consortium actually draws down HOME funds from HUD. Sources of HOME match include cash or cash equivalents from a non-federal source, value of waived taxes or fees, value of donated land or real property, a portion of housing bond proceeds, and the cost of infrastructure improvements, among others.

As a member jurisdiction, the City must comply with the HOME match requirements that have been established by the County. The County will evaluate match requirements for HOME and determine potential match sources. Some match sources may come from local affordable housing trust funds, housing bond proceeds, the value of waived local fees or permits, foregone property tax revenue, local road funds, private donations, services funded by service providers, the State, County, or foundations, other local agency funds, and publicly owned land.

The City does not receive a direct allocation of Emergency Solutions Grant Program (ESG) funds.

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

There are several “Below Market Rate (BMR)” rental housing properties that the City of Pleasanton has ground leases for:

- Ridgeview Commons – 200-unit senior affordable rental housing community.
- Promenade Apartments – 146-unit mixed-income rental housing.
- Parkview – 105-unit senior assisted living community.
- Kottinger Gardens Phase 1 – 131-unit senior affordable rental housing community.
- Sunflower Hill – 31-unit affordable rental housing community for clients with developmental disabilities.

Discussion

None.

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Annual Goals and Objectives

AP-20 Annual Goals and Objectives - 91.420, 91.220(c)(3)&(e)

Goals Summary Information

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
1	Housing Needs - <i>Affordable Rental Housing</i>	2020	2024	Affordable Housing	Citywide	Housing Needs	CDBG: \$0	Rental units constructed: <i>5 Household Housing Unit</i> Rental units rehabilitated: <i>5 Household Housing Units</i>
2	Housing Needs - <i>Preservation - Owner</i>	2020	2024	Affordable Housing	Citywide	Housing Needs	CDBG: \$0	Homeowner Housing Rehabilitated: <i>2 Household Housing Units</i>
3	Housing Needs - <i>Preservation - Rental</i>	2020	2024	Affordable Housing	Citywide	Housing Needs	CDBG: \$0	Rental units rehabilitated: <i>2 Household Housing Units</i>
4	Housing Needs – <i>First Time Homebuyer</i>	2020	2024	Affordable Housing	Citywide	Housing Needs	CDBG: \$0	Direct Financial Assistance to Homebuyers: <i>2 Households Assisted</i>
5	Housing Needs – <i>Reduction of Housing Discrimination</i>	2020	2024	Affordable Housing	Citywide	Housing Needs	CDBG: \$0	Public service activities for Low/Moderate Income Housing Benefit: <i>10 Households Assisted</i>

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
6	Homeless Needs	2020	2024	Affordable Housing Homeless	Citywide	Homeless Needs	CDBG: \$0	Homelessness Prevention: 2 Persons Assisted
7	Supportive Housing Needs	2020	2024	Affordable Housing	Citywide	Supportive Housing Needs	CDBG: \$0	Other: 2 Other
8	Community Development Needs - Capital Improvements	2020	2024	Non-Housing Community Development	Citywide	Community Development Needs	CDBG: \$442,709	Other: 2 Other
9	Community Development Needs - Economic Development	2020	2024	Non-Housing Community Development	Citywide	Community Development Needs	CDBG: \$0	Other: 1 Other
10	Community Development Needs - Public Services	2020	2024	Non-Housing Community Development	Citywide	Community Development Needs	CDBG: \$57,052	Public service activities other than Low/Moderate Income Housing Benefit: 100 Persons Assisted

Table 6 – Goals Summary

Goal Descriptions

1	Goal Name	Housing Needs - Affordable Rental Housing
	Goal Description	Promote the construction and preservation of affordable rental housing.
2	Goal Name	Housing Needs - Preservation - Owner
	Goal Description	Promote the preservation of single-family homes through rehabilitation or minor home repair.
3	Goal Name	Housing Needs - Preservation - Rental
	Goal Description	Promote the preservation of rental housing through minor home repair.
4	Goal Name	Housing Needs - First Time Homebuyer
	Goal Description	Provide direct financial assistance to income-eligible first time homebuyers.
5	Goal Name	Housing Needs - Reduction of Housing Discrimination
	Goal Description	Reduce Housing Discrimination through provision of fair housing and landlord/tenant services.
6	Goal Name	Homeless Needs
	Goal Description	Funding and supporting homeless services programs to end homelessness.
7	Goal Name	Supportive Housing Needs
	Goal Description	Increase the availability of service enriched housing for persons with special needs by supporting the acquisition and new construction of housing units.
8	Goal Name	Community Development Needs - Capital Improvements
	Goal Description	Make improvements, including ADA accessibility, to public facilities, such as curbs and sidewalks, neighborhood parks and recreational improvements, and to non-profit agency facilities. Make annual principal and interest HUD Section 108 Loan repayments.
9	Goal Name	Community Development Needs - Economic Development
	Goal Description	Fund economic development, micro-enterprise, and on-the-job training.
10	Goal Name	Community Development Needs - Public Services
	Goal Description	Support public service programs for low income residents, preserving safety net services for families and individuals who are vulnerable or "in-crisis".

AP-35 Projects - 91.420, 91.220(d)

Introduction

This section of the Action Plan includes the programs and activities which the City of Pleasanton will carry out to implement its Housing and Community Development Strategic Plan during FY 2024/2025.

This section describes individual activities to be funded with FY 2024/2025 Community Development Block Grant (CDBG) funding. The City's use of HOME funding is addressed separately under the County's section of the Consolidated Plan.

There are four (4) types of projects eligible for CDBG funds: capital improvement projects, economic development, housing, and public services. To be eligible for CDBG funding, projects must meet at least one (1) of HUD's national objectives: 1) to benefit low/moderate-income people; 2) to prevent or eliminate slums and blight; and 3) to meet an urgent community development need.

CDBG-funded projects must also pass the low- and moderate-income benefit test. A project meets this standard if at least 51% of the beneficiaries have low-moderate incomes (i.e., incomes at or below 80% of Area Median Income) or if the project benefits an area (e.g., census tracts, service area, neighborhood, etc.) with a majority of low-moderate income people. Funded projects are required to document the income levels of persons and households receiving these services.

For FY 2024/2025, the City is proposing to allocate its FY 2024/2025 CDBG funds in the following eligible funding categories: Public Services, Public Facilities, and General Administration.

#	Project Name
1	Open Heart Kitchen - Senior Meals Program
2	Spectrum Community Services - Meals on Wheels
3	City of Pleasanton Axis Section 108 Loan Repayment
4	Tri-Valley Haven Emergency Shelter Rebuild Project
5	City of Pleasanton Administration

Table 7 – Project Information

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

As recommended by the City's Human Services Commission and Housing Commission and to be approved by the Pleasanton City Council, Open Heart Kitchen's Senior Meals Program and Spectrum Community Services Meals on Wheels Program will be funded with CDBG public services funds in FY 2024/2025.

The City will continue to repay its HUD Section 108 Loan, in accordance with the 20-year repayment schedule for the \$950,000 HUD Section 108 Loan, which is shared with the cities of Dublin and

Livermore, used to complete the Axis Community Health Clinic.

The City will also allocate CDBG capital improvements funds to Tri-Valley Haven to assist them in demolition and rebuilding of its Emergency Shelter at a confidential location.

The main obstacles to addressing the City's underserved needs are: 1) the continued funding reductions to the CDBG and HOME programs, and 2) the available funding is far below what is necessary to address all the needs.

Allocation priorities are based on the Consolidated Plan. There are a number of barriers to providing affordable housing in Pleasanton, based on real estate market and non-market factors. Affordable housing projects are difficult to build due to the high cost of building materials. The cost and limited availability of land in Pleasanton contribute to high development costs. Affordable housing developments generally require multiple funding sources from public and private sources. HUD's cap of 15% of the allocation for public services is an obstacle for providing supportive services to homeless population, especially in smaller cities like Pleasanton which does not receive a significant allocation of CDBG funds.

DRAFT

AP-38 Project Summary

Project Summary Information

1	Project Name	Open Heart Kitchen - Senior Meals Program
	Target Area	Citywide
	Goals Supported	Community Development Needs - Public Services
	Needs Addressed	Community Development Needs
	Funding	CDBG: \$24,000
	Description	Open Heart Kitchen proposed to provide all free and reduced cost, nutritious senior meals at the Pleasanton Senior Center for lunch in FY 2024/25.
	Target Date	6/30/2025
	Estimate the number and type of families that will benefit from the proposed activities	Open Heart Kitchen is estimating to providing nutritional meals to 350 seniors in FY 2024/25.
	Location Description	Meals are served five days a week. Lunch is served at the Pleasanton Senior Center located at 5353 Sunol Blvd. in Pleasanton.
	Planned Activities	Open Heart Kitchen will be serving nutritional meals at the Pleasanton Senior Center during lunch.

2	Project Name	Spectrum Community Services - Meals on Wheels
	Target Area	Citywide
	Goals Supported	Community Development Needs - Public Services
	Needs Addressed	Community Development Needs
	Funding	CDBG: \$51,636
	Description	Spectrum plans to deliver 22,000 meals to 135 unduplicated and homebound, low-income seniors and disabled adults in Pleasanton in FY 2024/25.
	Target Date	6/30/2025
	Estimate the number and type of families that will benefit from the proposed activities	Spectrum will be delivering 22,000 meals to 135 unduplicated homebound, low-income Pleasanton seniors over 60 years old and disabled adults who lack reliable food access/are isolated.
	Location Description	Spectrum will be delivering meals to homebound seniors throughout the City.
Planned Activities	Spectrum will deliver 22,000 nutritional meals to 135 frail homebound, low-income seniors over 60 years old and disabled adults residing in Pleasanton.	

3	Project Name	City of Pleasanton Axis Section 108 Loan Repayment
	Target Area	Citywide
	Goals Supported	Community Development Needs - Capital Improvements
	Needs Addressed	Community Development Needs
	Funding	CDBG: \$23,804
	Description	Annual installment for repayment in FY 2024/25 (City of Pleasanton portion) of the \$950,000 Section 108 Loan from HUD for assisting in the acquisition of the Axis Community Health Clinic, in accordance to HUD's 20-year repayment schedule.
	Target Date	6/30/2025
	Estimate the number and type of families that will benefit from the proposed activities	The Section 108 loan repayment does not directly benefit Pleasanton and Tri-Valley residents, but Axis Community Health offers services from five sites, including the new clinic in the Tri-Valley area and serves more than 14,000 members of the community.
	Location Description	Axis Community Health Clinic is located at 5925 West Las Positas Blvd., Suite 100, Pleasanton, CA 94588.
	Planned Activities	The Section 108 loan repayment is in accordance with HUD's 20-Year Repayment Plan with a full term in FY 2033/2034.

4	Project Name	Tri-Valley Haven Emergency Shelter Rebuild
	Target Area	Citywide
	Goals Supported	Community Development Needs - Capital Improvements
	Needs Addressed	Community Development Needs
	Funding	CDBG: \$250,000
	Description	Tri-Valley Haven will demolish its existing emergency shelter due to structural problems and other uninhabitable conditions. Then it will rebuild the shelter that will provide 45 beds, which is 50% more capacity than the 30 beds provided by original shelter. The City is providing another \$250,000 CDBG funds to this project in addition to the \$250,000 allocated last fiscal year 2023/24.
	Target Date	6/30/2025
	Estimate the number and type of families that will benefit from the proposed activities	Tri-Valley Haven will have 45 beds once the emergency shelter is constructed.
	Location Description	Confidential location.
Planned Activities	Tri-Valley Haven plans to demolish an existing 30-bed emergency shelter and rebuild a new shelter that will have 45 beds. CDBG funds will be used for foundation preparation, ground breaking, excavation, and trenching costs.	

5	Project Name	City of Pleasanton Administration
	Target Area	Citywide
	Goals Supported	Housing Needs - Affordable Rental Housing Housing Needs - Preservation - Owner Housing Needs - Preservation - Rental Housing Needs - First Time Homebuyer Housing Needs - Reduce Housing Discrimination Homeless Needs Supportive Housing Needs Community Development Needs - Capital Improvements Community Development Needs - Economic Development Community Development Needs - Public Services
	Needs Addressed	Housing Needs Homeless Needs Supportive Housing Needs Community Development Needs
	Funding	CDBG: \$76,069
	Description	General administration and oversight of the City of Pleasanton's CDBG program in FY 2024/25.
	Target Date	6/30/2025
	Estimate the number and type of families that will benefit from the proposed activities	
	Location Description	The City's Housing Division is located at 200 Old Bernal Avenue, Pleasanton, CA 94566.
	Planned Activities	City staff will administer the CDBG Program in accordance to HUD CDBG regulations.

AP-50 Geographic Distribution - 91.420, 91.220(f)

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

The City of Pleasanton receives an allocation of Community Development Block Grant (CDBG) funds, which may be used for eligible activities, eligible households, and/or eligible areas within its jurisdiction. The CDBG funds are allocated according to a formula based on population data from the 2010 Census and the number of substandard units in each jurisdiction. All projects listed in the “Proposed Projects” tables are intended and open to serve eligible households within the City of Pleasanton. Census tracts that are located completely or partially within the current Pleasanton city limits are as follows: 4506.01, 4506.02, 4506.03, 4506.04, 4506.05, 4506.06, 4506.07, 4506.43, 4506.46, 4507.01, 4507.41, 4507.42, 4507.44, and 4507.45.

Geographic Distribution

Target Area	Percentage of Funds
Citywide	100

Table 8 - Geographic Distribution

Rationale for the priorities for allocating investments geographically

Geography was not used to determine funding allocation priorities.

Discussion

None.

AP-75 Barriers to affordable housing -91.420, 91.220(j)

Introduction

This section includes the actions planned by the City of Pleasanton during the FY 202/24 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 HOME Consortium will be updating the AI in accordance to HUD's new regulations.

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 Housing'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 Housing 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., Sojourner House emergency shelter). The cities, as well as the City of Dublin, collaborated to secure a Section 108 Loan to assist in financing the construction of the Axis Community Health Clinic in Pleasanton.
- The City has supported an extensive Housing Rehabilitation Program. The City and its program administrator Habitat for Humanity will continue to outreach to minority and women

contractors as well as local business enterprises.

- 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. This program was recently revamped into the Tri-Valley Rapid Rehousing Program to assist all income-eligible households.

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 2024/25. The City will continue to monitor the availability of specialized grants for housing development and will utilize its Lower Income Housing Fund 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's Inclusionary Zoning Ordinance provides the option of land dedication in lieu of providing affordable housing units. The City's certified Housing Element Update 2024-2031 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.

AP-85 Other Actions - 91.420, 91.220(k)

Introduction

The City will pursue the following planned actions in order to undertake the strategies outlined in Pleasanton's FY 2020-2024 Consolidated Plan.

Actions planned to address obstacles to meeting underserved needs

The primary obstacle to meeting the underserved needs in Pleasanton is securing adequate funding resources. The priority needs highlighted in its FY 2020-2024 Consolidated Plan are designed to address the underserved needs within the Pleasanton jurisdictional boundaries.

Actions planned to foster and maintain affordable housing

The primary gaps facing Pleasanton, as well as its neighbor cities, in delivering affordable and supportive housing are primarily the lack of financial resources (including land) for development, operations, and support services combined with a location that has the highest costs in the region. The City will continue to coordinate and collaborate with the Alameda County HOME Consortium, with Alameda County as the lead agency, to utilize federal HOME funds for acquisition, rehabilitation, and/or new construction of affordable rental housing; tenant-based rental assistance; and single-family and multi rental housing rehabilitation or minor repairs.

The City will continue to contract with the "housing services" non-profit agencies that have been recipients of Housing & Human Services Grant (HHS) program funds. These agencies provide housing services that help maintain people in housing and prevent homelessness.

The City's Housing Rehabilitation Program provide rehabilitation and minor home repair grants or loans for income-eligible homeowners. The program have historically preserved and improved the City's existing stock for extremely low- and very low-income homeowners. The City is also assessing extending the Housing Rehabilitation Program to income-eligible renters with disabilities to make accessibility improvements in their rental housing units.

Lastly, the City will continue to monitor its affordable housing portfolio that include more than 1,000 rental housing units and more than 100 homeownership units.

Actions planned to reduce lead-based paint hazards

Lead poisoning is a serious issue in some parts of Alameda County where there are significant numbers of older homes occupied by low income families with children (older homes are most likely to contain lead hazards). Lead hazards are defined as any condition that causes exposure to lead from lead-contaminated dust, soil, or paint that is deteriorated or present in accessible surfaces, friction surfaces,

or impact surfaces that would result in adverse human health effects. Common sources of lead poisoning are lead-based paint hazards from dust, deteriorated paint, and contaminated soil.

No new programs are being considered for the five-year period to reduce lead-based paint hazards in as much as the City's housing stock is generally young (post-1978) and in good condition and unlike to be exposed to the lead. Mitigations are currently implemented on an as needed basis in conjunction with County administered Housing Rehabilitation and Minor Home Repair Program activities. The City is not currently a party to the joint powers agreement which established Alameda County's existing lead abatement program. However, Pleasanton is likely to increase its involvement in lead based paint hazard reduction as involvement in housing rehabilitation programs increases in the future. The City will continue its collaboration with the Alameda County Lead Hazard Prevention Program on marketing and outreach efforts in the Tri-Valley area.

Through its subrecipients of federal funds, the City conducts lead-based paint inspections on tenant-based rental assistance for HOME units built before 1978 as required as part of the Uniform Physical Condition Standards (UPCS) inspections which replaced the Housing Quality Standard (HQS) Inspections. Lead inspections are also conducted as a part of any grants or loans for owner-occupied or rental units funded through the City's Housing Rehabilitation Program.

Actions planned to reduce the number of poverty-level families

A primary strength of the housing and community development delivery systems is the coordination of efforts between the jurisdictions and the groups that oversee these efforts on an inter-jurisdictional basis. An additional strength is the level of coordination between service providers, particularly those addressing housing needs of the homeless, special needs populations, and housing providers. Pleasanton participates on the Alameda County HOME Consortium Technical Advisory Committee (HOME TAC) which is comprised of staff from the member jurisdictions and the County. The HOME TAC meets bi-monthly to discuss programmatic and policy matters relating to the HOME program as well as broader federal housing and community development funding sources.

Many collaboration efforts are coordinated at the County level. The Shelter Plus Care and the Supportive Housing Program serve the homeless through housing rental assistance and supportive services and aim to reduce the number of people living in poverty in the County. Consortium jurisdictions are working to implement the EveryOne Home Plan, which includes representatives from local jurisdictions, service providers and advocates, homeless or formerly homeless persons, representatives of the faith community, business and labor representatives, education and health care professionals.

The Workforce Investment Board emphasizes private sector, employer-driven job training programs. The Alameda County Self-Sufficiency Program is designed to operate as a single, integrated system for the delivery of work-first, employment focused services. It complies with federal Temporary Assistance to Needy Families (TANF) and Food Stamp Employment and Training requirements and

incorporates CalWORKs program services and activities. The Self-Sufficiency Centers provide employment services, transportation, child care, drug and alcohol abuse treatment and mental health services to help individuals comply with their welfare-to-work plans. The program encourages community partnerships to leverage and maximize funds, prevent duplication of service delivery, and develop the capacity of the community to sustain a safety-net for an expanding population.

The HOME Program provides rental housing projects to assist households earning 60% or less of area median income. Priority considerations are given to proposals that include income targeting to households earning less than 30% of area median income, a target group that includes households living in poverty. Housing developments targeted to families and individuals in this income group often have a social services component to assist the households with other needs such as job training, skill building, case management, and subsidized child care.

Compliance with Section 3 of the Housing Act of 1968 is required as a condition of most City of Pleasanton funding contracts. The purpose of Section 3 is to ensure that employment and other economic opportunities generated by HUD assistance or HUD-assisted projects will be directed to low and very low-income persons, particularly persons who are recipients of HUD assistance for housing. The City has developed materials to distribute to contractors to ensure their good faith efforts in complying with Section 3 requirements.

Actions planned to develop institutional structure

The primary gaps facing Pleasanton and its neighbor cities in delivering affordable and supportive housing are primarily the lack of financial resources (including land) for development, operations, and support services combined with a location that has the highest costs in the region. Community development efforts are frequently limited due to a lack of financial resources. In some cases, there is need for stronger coordination between agencies and organizations although it is generally felt that the region enjoys a high level of coordination and simply needs to continue to foster and expand existing collaborative relationships.

Addressing gaps will continue to be a high priority for Pleasanton. The City will continue its efforts to identify and utilize new sources of financing for affordable housing, supportive housing, and community development programs; and enhance coordination efforts among housing providers, service providers, and governmental agencies. The City has streamlined and improved the process for selecting and funding housing and community development projects for its HOME and CDBG programs. In addition, the City has participated in the larger homeless and special needs housing initiatives (the EveryOne Home Plan and the annual Continuum of Care funding process) to select priorities and projects for homeless and special needs funding.

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

See above.

Discussion

None.

DRAFT

Program Specific Requirements

AP-90 Program Specific Requirements - 91.420, 91.220(I)(1,2,4)

Introduction

The program-specific requirements governed by the Community Development Block Grant (CDBG) Program and HOME Investment Partnership Program (HOME) are described below.

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 | 0 |
| 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: | 0 |

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. | 100.00% |

Attachments

Grantee SF-424's and Certification(s)

DRAFT

Application for Federal Assistance SF-424

* 1. Type of Submission: <input type="checkbox"/> Preapplication <input checked="" type="checkbox"/> Application <input type="checkbox"/> Changed/Corrected Application	* 2. Type of Application: <input checked="" type="checkbox"/> New <input type="checkbox"/> Continuation <input type="checkbox"/> Revision	* If Revision, select appropriate letter(s): <input type="text"/> * Other (Specify): <input type="text"/>
---	---	--

* 3. Date Received: <input type="text"/>	4. Applicant Identifier: CA62826 Pleasanton City
--	--

5a. Federal Entity Identifier: <input type="text"/>	5b. Federal Award Identifier: B24MC060050
---	---

State Use Only:

6. Date Received by State: <input type="text"/>	7. State Application Identifier: <input type="text"/>
--	--

8. APPLICANT INFORMATION:

*** a. Legal Name:** CA62826 Pleasanton City

* b. Employer/Taxpayer Identification Number (EIN/TIN): 94-6000397	* c. Organizational DUNS: ZQLCND5KBU99
--	--

d. Address:

* Street1:	P.O. Box 520
Street2:	(123 Main Street)
* City:	Pleasanton
County/Parish:	Alameda
* State:	CA: California
Province:	
* Country:	USA: UNITED STATES
* Zip / Postal Code:	94566-0802

e. Organizational Unit:

Department Name: City Manager	Division Name: Housing Division
---	---

f. Name and contact information of person to be contacted on matters involving this application:

Prefix: Mr.	* First Name: Steve
Middle Name:	
* Last Name: Hernandez	
Suffix:	
Title: Housing Manager	

Organizational Affiliation:
City of Pleasanton

* Telephone Number: 925-931-5007	Fax Number:
---	--------------------

*** Email:** shernandez@cityofpleasantonca.gov

Application for Federal Assistance SF-424

*** 9. Type of Applicant 1: Select Applicant Type:**

C: City or Township Government

Type of Applicant 2: Select Applicant Type:

Type of Applicant 3: Select Applicant Type:

* Other (specify):

*** 10. Name of Federal Agency:**

U.S. Department of Housing and Urban Development (HUD)

11. Catalog of Federal Domestic Assistance Number:

14.218

CFDA Title:

Community Development Block Grant (CDBG)

*** 12. Funding Opportunity Number:**

14.218

* Title:

Community Development Block Grant (CDBG)

13. Competition Identification Number:

Title:

14. Areas Affected by Project (Cities, Counties, States, etc.):

Add Attachment

Delete Attachment

View Attachment

*** 15. Descriptive Title of Applicant's Project:**

CDBG Application for FY 2024/2025 for the City of Pleasanton, California.

Attach supporting documents as specified in agency instructions.

Add Attachments

Delete Attachments

View Attachments

Application for Federal Assistance SF-424

16. Congressional Districts Of:

* a. Applicant

* b. Program/Project

Attach an additional list of Program/Project Congressional Districts if needed.

Add Attachment

Delete Attachment

View Attachment

17. Proposed Project:

* a. Start Date:

* b. End Date:

18. Estimated Funding (\$):

* a. Federal	<input type="text" value="380,348.00"/>
* b. Applicant	<input type="text" value="0.00"/>
* c. State	<input type="text" value="0.00"/>
* d. Local	<input type="text" value="0.00"/>
* e. Other	<input type="text" value="0.00"/>
* f. Program Income	<input type="text" value="0.00"/>
* g. TOTAL	<input type="text" value="380,348.00"/>

*** 19. Is Application Subject to Review By State Under Executive Order 12372 Process?**

a. This application was made available to the State under the Executive Order 12372 Process for review on

b. Program is subject to E.O. 12372 but has not been selected by the State for review.

c. Program is not covered by E.O. 12372.

*** 20. Is the Applicant Delinquent On Any Federal Debt? (If "Yes," provide explanation in attachment.)**

Yes No

If "Yes", provide explanation and attach

Add Attachment

Delete Attachment

View Attachment

21. *By signing this application, I certify (1) to the statements contained in the list of certifications and (2) that the statements herein are true, complete and accurate to the best of my knowledge. I also provide the required assurances** and agree to comply with any resulting terms if I accept an award. I am aware that any false, fictitious, or fraudulent statements or claims may subject me to criminal, civil, or administrative penalties. (U.S. Code, Title 218, Section 1001)**

** I AGREE

** The list of certifications and assurances, or an internet site where you may obtain this list, is contained in the announcement or agency specific instructions.

Authorized Representative:

Prefix: * First Name:

Middle Name:

* Last Name:

Suffix:

* Title:

* Telephone Number: Fax Number:

* Email:

* Signature of Authorized Representative:

* Date Signed:

DRAFT

ASSURANCES - CONSTRUCTION PROGRAMS

OMB Number: 4040-0009
Expiration Date: 01/31/2019

Public reporting burden for this collection of information is estimated to average 15 minutes per response, including time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden, to the Office of Management and Budget, Paperwork Reduction Project (0348-0042), Washington, DC 20503.

PLEASE DO NOT RETURN YOUR COMPLETED FORM TO THE OFFICE OF MANAGEMENT AND BUDGET. SEND IT TO THE ADDRESS PROVIDED BY THE SPONSORING AGENCY.

NOTE: Certain of these assurances may not be applicable to your project or program. If you have questions, please contact the Awarding Agency. Further, certain Federal assistance awarding agencies may require applicants to certify to additional assurances. If such is the case, you will be notified.

As the duly authorized representative of the applicant, I certify that the applicant:

1. Has the legal authority to apply for Federal assistance, and the institutional, managerial and financial capability (including funds sufficient to pay the non-Federal share of project costs) to ensure proper planning, management and completion of project described in this application.
2. Will give the awarding agency, the Comptroller General of the United States and, if appropriate, the State, the right to examine all records, books, papers, or documents related to the assistance; and will establish a proper accounting system in accordance with generally accepted accounting standards or agency directives.
3. Will not dispose of, modify the use of, or change the terms of the real property title or other interest in the site and facilities without permission and instructions from the awarding agency. Will record the Federal awarding agency directives and will include a covenant in the title of real property acquired in whole or in part with Federal assistance funds to assure non-discrimination during the useful life of the project.
4. Will comply with the requirements of the assistance awarding agency with regard to the drafting, review and approval of construction plans and specifications.
5. Will provide and maintain competent and adequate engineering supervision at the construction site to ensure that the complete work conforms with the approved plans and specifications and will furnish progressive reports and such other information as may be required by the assistance awarding agency or State.
6. Will initiate and complete the work within the applicable time frame after receipt of approval of the awarding agency.
7. Will establish safeguards to prohibit employees from using their positions for a purpose that constitutes or presents the appearance of personal or organizational conflict of interest, or personal gain.
8. Will comply with the Intergovernmental Personnel Act of 1970 (42 U.S.C. §§4728-4763) relating to prescribed standards of merit systems for programs funded under one of the 19 statutes or regulations specified in Appendix A of OPM's Standards for a Merit System of Personnel Administration (5 C.F.R. 900, Subpart F).
9. Will comply with the Lead-Based Paint Poisoning Prevention Act (42 U.S.C. §§4801 et seq.) which prohibits the use of lead-based paint in construction or rehabilitation of residence structures.
10. Will comply with all Federal statutes relating to non-discrimination. These include but are not limited to: (a) Title VI of the Civil Rights Act of 1964 (P.L. 88-352) which prohibits discrimination on the basis of race, color or national origin; (b) Title IX of the Education Amendments of 1972, as amended (20 U.S.C. §§1681 1683, and 1685-1686), which prohibits discrimination on the basis of sex; (c) Section 504 of the Rehabilitation Act of 1973, as amended (29 U.S.C. §794), which prohibits discrimination on the basis of handicaps; (d) the Age Discrimination Act of 1975, as amended (42 U.S.C. §§6101-6107), which prohibits discrimination on the basis of age; (e) the Drug Abuse Office and Treatment Act of 1972 (P.L. 92-255), as amended relating to nondiscrimination on the basis of drug abuse; (f) the Comprehensive Alcohol Abuse and Alcoholism Prevention, Treatment and Rehabilitation Act of 1970 (P.L. 91-616), as amended, relating to nondiscrimination on the basis of alcohol abuse or alcoholism; (g) §§523 and 527 of the Public Health Service Act of 1912 (42 U.S.C. §§290 dd-3 and 290 ee 3), as amended, relating to confidentiality of alcohol and drug abuse patient records; (h) Title VIII of the Civil Rights Act of 1968 (42 U.S.C. §§3601 et seq.), as amended, relating to nondiscrimination in the sale, rental or financing of housing; (i) any other nondiscrimination provisions in the specific statute(s) under which application for Federal assistance is being made; and (j) the requirements of any other nondiscrimination statute(s) which may apply to the application.

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.

Uniform Relocation Act and 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, (42 U.S.C. 4601-4655) and implementing regulations at 49 CFR 24. It has in effect and is following a residential anti-displacement and relocation assistance plan required under 24 CFR Part 42 in connection with any activity assisted with funding under the Community Development Block Grant or HOME programs.

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 Community Development Block Grant, HOME, Emergency Solutions Grant, and Housing Opportunity for Person with AIDS funds are consistent with the strategic plan in the jurisdiction's consolidated plan.

Section 3 -- It will comply with section 3 of the Housing and Urban Development Act of 1968 (12 U.S. C. 1701u) and implementing regulations at 24 CFR Part 75.

Signature/Authorized Official
Gerry Beaudin

Date

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 **2024** 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.

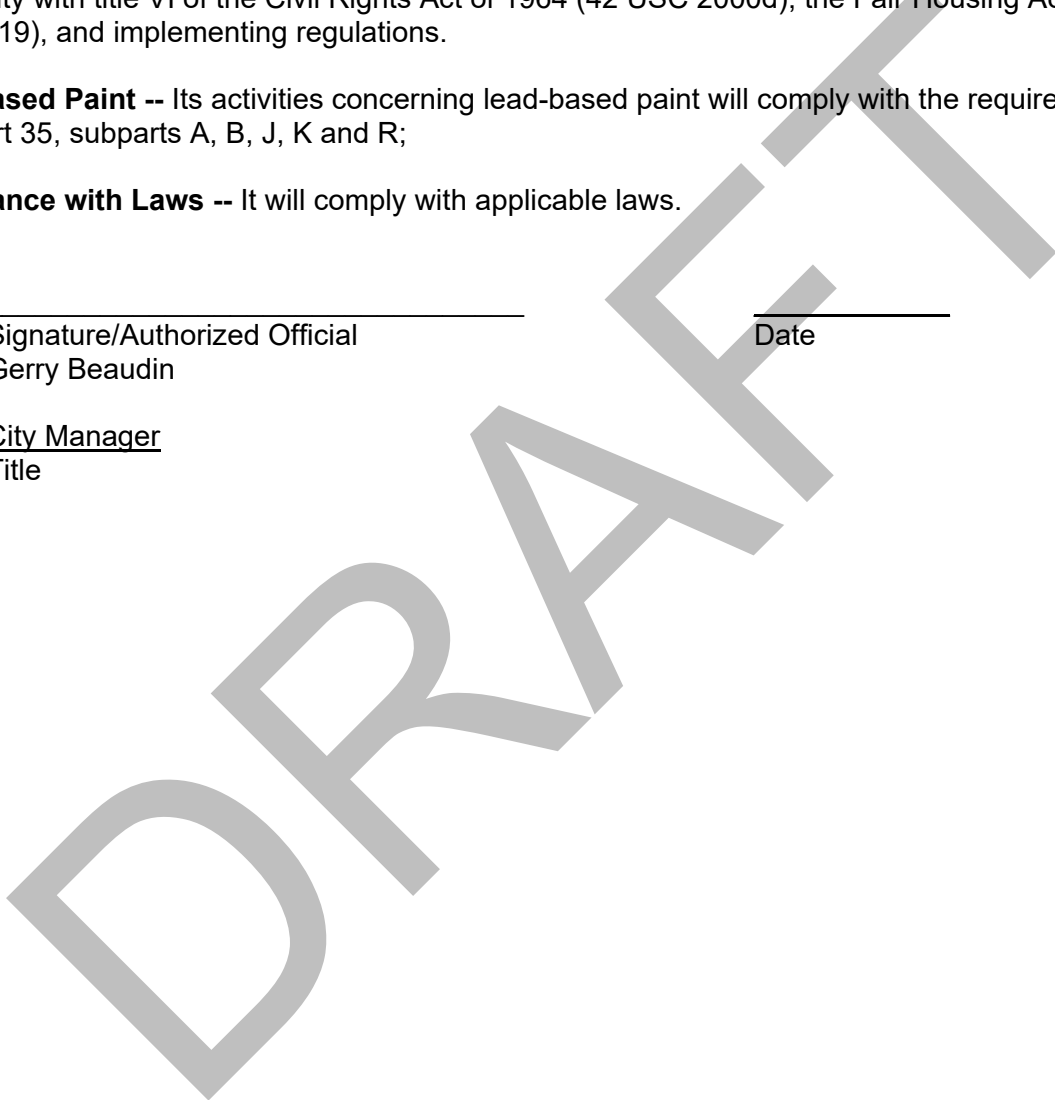
Lead-Based Paint -- Its activities concerning lead-based paint will comply with the requirements of 24 CFR Part 35, subparts A, B, J, K and R;

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

Signature/Authorized Official
Gerry Beaudin

Date

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
Gerry Beaudin

Date

City Manager
Title

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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).

Signature/Authorized Official
Gerry Beaudin

Date

City Manager
Title

11. Will comply, or has already complied, with the requirements of Titles II and III of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (P.L. 91-646) which provide for fair and equitable treatment of persons displaced or whose property is acquired as a result of Federal and federally-assisted programs. These requirements apply to all interests in real property acquired for project purposes regardless of Federal participation in purchases.
12. Will comply with the provisions of the Hatch Act (5 U.S.C. §§1501-1508 and 7324-7328) which limit the political activities of employees whose principal employment activities are funded in whole or in part with Federal funds.
13. Will comply, as applicable, with the provisions of the Davis-Bacon Act (40 U.S.C. §§276a to 276a-7), the Copeland Act (40 U.S.C. §276c and 18 U.S.C. §874), and the Contract Work Hours and Safety Standards Act (40 U.S.C. §§327-333) regarding labor standards for federally-assisted construction subagreements.
14. Will comply with flood insurance purchase requirements of Section 102(a) of the Flood Disaster Protection Act of 1973 (P.L. 93-234) which requires recipients in a special flood hazard area to participate in the program and to purchase flood insurance if the total cost of insurable construction and acquisition is \$10,000 or more.
15. Will comply with environmental standards which may be prescribed pursuant to the following: (a) institution of environmental quality control measures under the National Environmental Policy Act of 1969 (P.L. 91-190) and Executive Order (EO) 11514; (b) notification of violating facilities pursuant to EO 11738; (c) protection of wetlands pursuant to EO 11990; (d) evaluation of flood hazards in floodplains in accordance with EO 11988; (e) assurance of project consistency with the approved State management program developed under the Coastal Zone Management Act of 1972 (16 U.S.C. §§1451 et seq.); (f) conformity of Federal actions to State (Clean Air) implementation Plans under Section 176(c) of the Clean Air Act of 1955, as amended (42 U.S.C. §§7401 et seq.); (g) protection of underground sources of drinking water under the Safe Drinking Water Act of 1974, as amended (P.L. 93-523); and, (h) protection of endangered species under the Endangered Species Act of 1973, as amended (P.L. 93-205).
16. Will comply with the Wild and Scenic Rivers Act of 1968 (16 U.S.C. §§1271 et seq.) related to protecting components or potential components of the national wild and scenic rivers system.
17. Will assist the awarding agency in assuring compliance with Section 106 of the National Historic Preservation Act of 1966, as amended (16 U.S.C. §470), EO 11593 (identification and protection of historic properties), and the Archaeological and Historic Preservation Act of 1974 (16 U.S.C. §§469a-1 et seq).
18. Will cause to be performed the required financial and compliance audits in accordance with the Single Audit Act Amendments of 1996 and OMB Circular No. A-133, "Audits of States, Local Governments, and Non-Profit Organizations."
19. Will comply with all applicable requirements of all other Federal laws, executive orders, regulations, and policies governing this program.
20. Will comply with the requirements of Section 106(g) of the Trafficking Victims Protection Act (TVPA) of 2000, as amended (22 U.S.C. 7104) which prohibits grant award recipients or a sub-recipient from (1) Engaging in severe forms of trafficking in persons during the period of time that the award is in effect (2) Procuring a commercial sex act during the period of time that the award is in effect or (3) Using forced labor in the performance of the award or subawards under the award.

SIGNATURE OF AUTHORIZED CERTIFYING OFFICIAL 	TITLE <input type="text" value="City Manager"/>
APPLICANT ORGANIZATION <input type="text" value="City of Pleasanton"/>	DATE SUBMITTED 