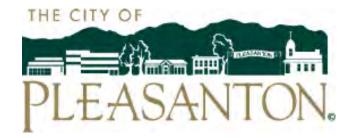
Consolidated Plan

Housing and Community Development Strategic Plan

FY 2015 – FY 2019



Alameda County HOME Consortium May 2015

OMB Number: 4040-0004

Application for	Federal Assista	nce SF-424			
* 1. Type of Submis	sion:	* 2. Type of Application:	* if Re	evision, select appropriate letter(s):	
Preapplication	ו	New New			
Application		Continuation	* Othe	ter (Specify):	
Changed/Con	rected Application	Revision			
* 3. Date Received:		4. Applicant Identifier:			
05/01/2015		CA62826 PLEASANTON C	ITY		
5a. Federal Entity Id	lentifier:		5b.	b. Federal Award Identifier:	
			в-	-05-MC-15-0050	
State Use Only:			•		
6. Date Received by	y State:	7. State Application	Identii	tifier:	
8. APPLICANT INF	FORMATION:				
* a. Legal Name: [CA62826 PLEASAN	TON CITY			
* b. Employer/Taxpa	ayer Identification Nur	mber (EIN/TIN):	* c.	c. Organizational DUNS:	
94-6000397			00	049397240000	
d. Address:					
* Street1:	123 Main Stre	et			
Street2:	P.O. Box 520	·			
* City:	Pleasanton				
County/Parish:	Alameda				
* State:				CA: California]
Province:					
* Country:			1	USA: UNITED STATES]
* Zip / Postal Code:	94566-0802				
e. Organizational	Unit:				
Department Name:			Div	ivision Name:	
	·····	,			
f. Name and conta	act information of p	erson to be contacted on m	atters	rs involving this application:	
Prefix:		* First Name	e:	Scott	
Middle Name:]	
* Last Name: Er	ickson				
Suffix:					
Title: Housing S	Specialist				
Organizational Affili	ation:				-
City of Please	anton				
* Telephone Numbe	er. 925-931-5007			Fax Number.	
*Email: sericks	son@cityofpleas	antonca.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
* 12. Funding Opportunity Number:
14.218
* Title:
Community Development Block Grant
13. Competition Identification Number:
Title:
14. Areas Affected by Project (Cities, Countles, States, etc.):
Add Attachment Delete Attachment View Attachment
* 15. Descriptive Title of Applicant's Project:
CDBG application for FY 2015 for the City of Pleasanton, CA
Attach supporting documents as specified in agency instructions.
Add Attachments Delete Attachments View Attachments

Application	for Fed	eral Assistance	e SF-424				
16. Congress	ional Dist	ricts Of:					
* a. Applicant	10				* b. Prog	gram/Project 10	
Attach an addit	ional list of	Program/Project C	ongressional Distric	ts if needed.			
				Add Attachment	Delete /	Attachment Vie	w Attachment
17. Proposed	Project:						
* a Start Date:	07/01/	2015			•	b. End Date: 06/30	0/2016
18. Estimated	Funding	(\$):					
* a. Federal			268,922.00				
* b. Applicant			0.00				
* c. State			0.00				
* d. Local			0.00				
* e. Other			0.00				
* f. Program In			0.00				
*g. TOTAL			268,922.00				
b. Program	n is subje		out has not been so	er the Executive Or elected by the State		cess for review on	
Yes			Federal Debt? (I	"Yes," provide ex Add Attachment			w Attachment
herein are tru comply with a subject me to	ue, compl iny result criminal, E ertification	ete and accurate ing terms if I acce civil, or administ	e to the best of n opt an award. I am rative penalties. (I	ny knowledge. I al aware that any fal U.S. Code, Title 211	so provide th se, fictitious, c 3, Section 100'	le required assurar or fraudulent statem 1)	that the statements ices** and agree to ents or claims may ouncement or agency
Authorized Re	epresenta	tive:					
Prefix:			+ Fin	st Name: Steven			
Middle Name:							
* Last Name:	Bocian			· · · · · · · · · · · · · · · · · · ·			
Suffix:	L						
* Title: A:	ssistant	: City Manager	5				
* Telephone Nu	umber: 92	5-931-5002			Fax Number:		
* Email: sboc	ian@cit	yofpleasanton	ca.gov				
		Representative:	1	up			* Date Signed:

CERTIFICATIONS

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

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

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

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

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

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

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

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

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

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

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

Signature/Authorized Official Steven Bocian

<u>May 13, 2015</u> Date

Assistant City Manager Title

Specific CDBG Certifications

The Entitlement Community certifies that:

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

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

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

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

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

2. **Overall Benefit**. The aggregate use of CDBG funds including section 108 guaranteed loans during program year **2015** 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. Also, if the property for public improvements financed by a source other than CDBG funds if the jurisdiction certifies that it lacks CDBG funds to cover the assessment.

Excessive Force -- It has adopted and is enforcing:

1. A policy prohibiting the use of excessive force by law enforcement agencies within its jurisdiction against any individuals engaged in non-violent civil rights demonstrations; and

2. A policy of enforcing applicable State and local laws against physically barring entrance to or exit from a facility or location which is the subject of such non-violent civil rights demonstrations within its jurisdiction;

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

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

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

Signature/Authorized Official Steven Bocian

<u>May 13, 2015</u> Date

Assistant City Manager Title

Specific HOME Certifications

The HOME participating jurisdiction certifies that:

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

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

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

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

Signature/Authorized Official Steven Bocian

<u>May 13, 2015</u> Date

Assistant City Manager Title

APPENDIX TO CERTIFICATIONS

INSTRUCTIONS CONCERNING LOBBYING AND DRUG-FREE WORKPLACE REQUIREMENTS:

A. Lobbying Certification

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

B. Drug-Free Workplace Certification

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

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

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).

Executive Summary

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

1. Introduction

Alameda County Housing and Community Development Department (HCD) of the Alameda County Community Development Agency is the lead agency for the Alameda County HOME Consortium, which includes the cities of Alameda, Fremont, Hayward, Livermore, Pleasanton, San Leandro, and Union City, and the Urban County, which includes the cities of Albany, Dublin, Emeryville, Newark, and Piedmont, and the unincorporated areas of the County.

The HOME Consortium (referred to as the Consortium in this document) has adopted a five-year consolidated planning cycle starting July 1, 2015, through June 30, 2020, and has produced this Action Plan for the first year of that cycle (July 1, 2015 – June 30, 2016) (FY15). This Consolidated Plan and Action Plan have been prepared for all jurisdictions in the Consortium. HCD coordinated the process with the assistance of community development and planning staff from each of the Consortium's jurisdictions.

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

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

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

PRIORITY HOUSING NEEDS

- Rental Housing Production
- Housing Preservation
- First Time Homebuyer
- Fair Housing

PRIORITY HOMELESS NEEDS

PRIORITY SUPPORTIVE HOUSING NEEDS

COMMUNITY DEVELOPMENT NEEDS

Health Care Access

Consolidated Plan

- Youth Opportunities
- Seniors
- Emerging Community Needs
- Infrastructure Development
- Economic Development

3. Evaluation of past performance

An evaluation of FY13 activities was developed for public comment in August 2014. Accomplishments for FY13 activities were included in the FY13 CAPER that was released for public comment in September 2014. Please refer to prior year CAPERs for an evaluation of past performance. The CAPER for FY14/15 will be completed in September 2015.

4. Summary of citizen participation process and consultation process

Community participation is a very important part of the Consolidated Plan and Action Plan development process. The City maintains an active database of potential interested parties and uses it to send out notification of grant funding opportunities at the beginning of every application cycle (early December) which is also the beginning of the annual Action Plan (and Consolidated Plan) process. The list currently includes approximately 250 nonprofit agencies, individuals, and other interested parties. In addition, ads are placed in local newspapers (including the Pleasanton Weekly which is distributed to every household in Pleasanton) and on the City's web site. Interested parties have multiple opportunities to participate and provide input on the process starting with annual grant workshops in early December through the annual CAPER hearing held annually in August.

A pre-draft public hearing on the Consolidated Plan and Analyisis of Impediments to Fair Housing Choice (AI) took place on January 13, 2015, at the Housing and Community Development Advisory Committee meeting. The purpose of the meeting was to present an overview of the Consolidated Plan and AI, and review and solicit input on the housing and community development needs in the HOME Consortium. No public comments were received.

The 30-day public comment period for the Consolidated Plan will take place from April 9 - May 8, 2015. A public hearing will be held on April 16, 2015, to take comments on the draft HOME Consortium Consolidated Plan. Public Notices are placed in the following newspapers: Alameda Times Star, Oakland Tribune, Hayward Daily Review, Fremont Argus and the Tri-Valley Herald. The notice includes provisions for how the disabled can access the meeting along with a detailed description of what is included in the Consolidated Plan. At the public hearing, the hearing is listed and noticed as a hearing in the agenda. A sign-in sheet is circulated for attendance. HCD staff present the staff report regarding the Consolidated Plan. Committee members ask questions of staff, the public is then asked to make comments. Any comments are recorded in the meeting. The draft Consolidated Plan will be distributed to all cities and main library branches in Alameda County, HUD, and any interested citizens, organizations, or agencies. The City will also post the draft and final plans on its web site. Once the Consolidated Plan is adopted, it will be made available along with any substantial amendments (if necessary) and the annual performance reports made to the general public.

5. Summary of public comments

To-date no comments have been received.

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

Not applicable.

7. Summary

Not applicable.

The Process

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

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

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

Agency Role	Name	Department/Agency
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 Specialist who reports directly to the Assistant City Manager in the City Manager's office. The Housing Specialist is also responsible for administering the CDBG program and is the liaison to County of Alameda for matters related to the HOME program (the City of Pleasanton is a member of the Alameda County HOME Consortium).

Consolidated Plan Public Contact Information

City of Pleasanton Attn: Scott Erickson, Housing Specialist 200 Old Bernal Ave., P.O. Box 520 Pleasanton, CA 94566-0802 Tel. 925-931-5007 Email: serickson@cityofpleasantonca.gov

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

1. Introduction

The Consolidated 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 FY15-FY19 Consolidated Plan was prepared through consultation with other public and private entities. At the countywide level, the HOME Consortium Technical Advisory Committee (TAC), composed of staff from all jurisdictions in the HOME Consortium, met 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 is an important document for the HOME Consortium

Locally, information for Pleasanton's section of the Consolidated Plan was collected through consultation with a variety of entities:

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 Consolidated Plan were meetings held in August 2014 (for the annual CAPER review), October 2014 (discussion of Consolidated Plan goals), November 2014 (discussion of priorities for the upcoming Housing and Human Services Grant, or HHSG, process), February 2015 (discussion of the process for reviewing and evaluating applications for HHSG funding), and April 2015 (recommendation for HHSG funding for projects to 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. The HC provided a representative to a multi-jurisdictional subcommittee in October 2014 to develop updated policies and priorities for the new Consolidated Plan. In March 2015, the HC developed a recommendation for HHSG funding for housing-related projects and programs to be included in the next Action Plan.

The City Council served as the highest level decision making body for all matters related to the Consolidated Plan. The Council holds public meetings twice monthly on the first and third Tuesday of the month. The Council met on April 21, 2015, to review recommendations for HHSG funding from the HSC and HC for projects to be included in the next Action Plan. At the same meeting, the Council heard public comments and, on May 5, 2015, formally approved the Consolidated Plan for FY 2015-19 and the Action Plan for FY 2015-16 for submission 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(I)).

In October 2014, the cities of Pleasanton and Livermore formed a multi-jurisdictional subcommittee specifically to discuss policies and priorities for incorporation into the FY 2015-19 Consolidated Plan. The subcommittee, comprised of commission and staff representatives from both cities, held two open public meetings which resulted in an updated set of common regional priorities for incorporation into the Con Plan.

In addition to the Tri-Valley Human Services Needs Assessment referenced earlier, the recent Housing Element update process provided another significant opportunity for public input regarding goals, policies, and programs for the City's future housing development. The Housing Element process (which started in early 2014 and culminated in early 2015 with certification by the State) was conducted in collaboration with PMC, a consultant specializing in the preparation of local housing elements. The process involved two public community workshops, stakeholder consultations, and focus group meetings that took place throughout 2014. Stakeholder meetings involved participation from both non-profit and for-profit groups, including Community Resources for Independent Living (CRIL), Neighborhood Solutions, Community Housing Developers, Citizens for a Caring Community, Sunflower Hill, the JRB Group, Tri-Valley REACH, Satellite Affordable Housing, MidPen Housing, ROEM Development Corporation, Ponderosa Homes, Habitat for Humanity, and local real estate representatives.

The City of Pleasanton collaborates with Livermore and Dublin to hold two annual grant kickoff meetings in early December. The City maintains an active database of potential interested parties and uses it to send out notification of grant funding opportunities at the beginning of every application cycle (early December). The list currently includes approximately 250 nonprofit agencies, individuals, and other interested parties. In addition, ads are placed in local newspapers (including the Pleasanton Weekly which is distributed to every household in Pleasanton) and on the City's web site. Representatives from approximately 60 agencies (primarily non-profit) and other interested parties attended the annual meetings held in December 2014 and were able to use these opportunities to learn and provide feedback regarding policies and programs of relevance to the Consolidated Plan.

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

The EveryOne Home Plan has been adopted by the Alameda County Board of Supervisors and all 14 cities, and endorsed by numerous community organizations.

Implementation of the Plan is coordinated by a community-based organization of the same name. It is guided by a Leadership Board comprised of jurisdictional appointed members and key community constituencies such as consumers, cities, nonprofit service providers and housing developers, businesses, law enforcement, housing authorities, and faith-based organizations.

EveryOne Home envisions a system of housing and services in Alameda County that, by 2020, ensures all extremely low-income residents have a safe, supportive and permanent place to call home, with services available to help them stay housed and improve the quality of their lives. EveryOne Home partners are working on five core strategies: 1) Prevent homelessness and other housing crises; 2) Increase housing opportunities for homeless and extremely low-income households; 3) Deliver flexible services to support stability and independence; 4) Measure success and report outcomes; and 5)Develop long-term leadership and build political will.

Alameda County will continue to implement a program using State funds at the County level that uses rapid rehousing strategies to assist homeless individuals leaving State correctional facilities to avoid homelessness. The THP+ program provides transitional housing for youth aging out of foster care. In addition, the Social Services Agency in the County, in collaboration with local providers, is development an 'Emancipation Village' with housing and services for emancipating foster youth. While the Village is located in Oakland, it will serve youth coming from the entire County.

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 three separate care systems — homeless services, HIV/AIDS services and mental health services — that share overlapping client populations. 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 now serves as the County's Continuum of Care.

EveryOne Home coordinates local efforts to address homelessness, seeks to maintain the existing service capacity, build new partnerships that generate greater resources for the continuum of housing, services, and employment, and establish inter-jurisdictional cooperation. 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. EveryOne Home receives administrative funding through Alameda County's General Fund as well as contributions from each of Alameda County's jurisdictions.

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

Consultation with EveryOne Home, the Alameda Countywide Continuum of Care, on the use of Emergency Solutions Grant (ESG) funds, began in early 2012, when representatives from the City of Berkeley, the City of Oakland, Alameda County Housing and Community Development Department (Urban County grantee), and EveryOne Home worked together to implement the new ESG requirements in a way that would be consistent county-wide and would continue a collaboration which began in 2009 with American Recovery and Reinvestment Act (ARRA) Homelessness Prevention and Rapid Re-housing (HPRP) funds. This collaboration resulted in the creation of Priority Home Partnership (PHP), which was a single county-wide program to implement HPRP. EveryOne Home held a community-wide meeting at which additional consultation and public input into the use of ESG funds was solicited. A series of meetings with EveryOne Home and the ESG grantees continues through the year and a coordinated ESG program was established and began implementation in early 2013. This coordinated program will use this same structure for FY15-FY19 ESG funding.

- Alameda County HCD, City of Berkeley and City of Oakland met to discuss regional issues affecting all three entitlement jurisdictions and to coordinate HOPWA and Continuum of Care consultations.
- Presentation of the draft Community Development Block Grant Unincorporated County Strategy 2015-2019 before the Unincorporated Services Committee of the Alameda County Board of Supervisors. Received Citizen input on Strategy to date.
- Meeting between Healthy Homes and Urban County to develop strategies for ways the Healthy Homes program could meet the needs of the Urban County jurisdictions for the next five years.
- Email and telephone conversations regarding needs and activities for next five years. Also consulted with City of Alameda Housing Authority and City of Livermore Housing Authority. City of Pleasanton Housing Authority is a part of the Housing Authority of Alameda County.
- Stakeholders survey for the Analysis of Impediments to Fair Housing Choice telephone and email survey.
- Survey sent out to HOME Consortium jurisdictions Citizen's Advisory Committees (or equivalent) to get their perceptions on what the priority needs are for the HOME Consortium over the next five years. 143 responses received. Information used to help shape priority areas.
- Joint meeting with the Cities of Berkeley and Oakland, HCD and Everyone Home to develop five year strategies for ending homelessness.
- Meeting with the Cities of Oakland, Berkeley, HCD and Contra Costa County to discuss regional HOPWA needs for the next five years.

Efforts were made to include as broad a group of community stakeholders as possible. No agency types were excluded from participation.

Efforts were made to include as broad a group of community stakeholders as possible. No agency types were excluded from participation.

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

1	ble 2– Agencies, groups, organizations who participat Agency/Group/Organization	ALAMEDA COUNTY HOUSING & COMMUNITY
		DEVELOPMENT
	Agency/Group/Organization Type	Other government - County
	What section of the Plan was addressed by	Housing Need Assessment
	Consultation?	Lead-based Paint Strategy
		Homelessness Strategy
		Homeless Needs - Chronically homeless
		Homeless Needs - Families with children
		Homelessness Needs - Veterans
		Homelessness Needs - Unaccompanied youth
		Non-Homeless Special Needs
		Market Analysis
		Anti-poverty Strategy
	How was the Agency/Group/Organization	Alameda County is the lead agency in the Alameda
	consulted and what are the anticipated	County HOME Consortium and coordinates much
	outcomes of the consultation or areas for	of the information collection for the preparation of
	improved coordination?	the Consolidated Plan.
2	Agency/Group/Organization	Housing Authority of Alameda County
	Agency/Group/Organization Type	РНА
	What section of the Plan was addressed by	Housing Need Assessment
	Consultation?	Public Housing Needs
	How was the Agency/Group/Organization	HACA administers the Section 8 voucher program
	consulted and what are the anticipated	in Pleasanton and provided info on the number of
	outcomes of the consultation or areas for	current voucher holders as well as general
	improved coordination?	information on the demand for Public Housing and
		rental assistance in Pleasanton and the
		surrounding region.
3	Agency/Group/Organization	Neighborhood Solutions
	Agency/Group/Organization Type	Housing
	What section of the Plan was addressed by	Housing Need Assessment
	Consultation?	Housing rehabilitation needs
	How was the Agency/Group/Organization	The City has a contract with Neighborhood
	consulted and what are the anticipated	Solutions (NS) to administer the Housing
	outcomes of the consultation or areas for	Rehabilitation Program. NS provided data on past,
	improved coordination?	current, and projected demand for housing
		rehabilitation services in Pleasanton.
4	Agency/Group/Organization	City of Livermore
	Agency/Group/Organization Type	Other government - Local

Table 2– Agencies, groups, organizations who participated

What section of the Plan was addressed by	Housing Need Assessment
Consultation?	Economic Development
	Human Services Needs Assessment
How was the Agency/Group/Organization	The cities of Pleasanton and Livermore
consulted and what are the anticipated	collaborated to conduct the Tri-Valley Human
outcomes of the consultation or areas for	Services Needs Assessment in 2011. In 2013, the
improved coordination?	City of Pleasanton used the results of the needs
	assessment to produce a strategic plan for
	implementation.

Identify any Agency Types not consulted and provide rationale for not consulting Not applicable.

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		

Table 3– Other local / regional / federal planning efforts

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

See above.

Narrative

In 2011, Resource Development Associations (RDA), a local consulting firm specializing in strategic planning and evaluation for local government and nonprofit entities, facilitated a broad-based community-driven assessment of human service needs in Eastern Alameda County (commissioned jointly by the Tri-Valley cities of Pleasanton, Livermore, and Dublin). The effort resulted in the adoption in late 2011 of the Tri-Valley Human Services Needs Assessment which identified strengths as well as gaps in human services in the Tri-Valley region (the full study is available on the City's web site at http://www.cityofpleasantonca.gov/civicax/filebank/blobdload.aspx?BlobID=24607). In addition to multi-jurisdictional collaboration, the study involved several community surveys as well as direct consultation with a large number of nonprofit agencies, individuals, and other interested parties in a variety of settings and formats (e.g., key informant interviews, focus discussion groups, etc.). Agencies consulted included Child Care Links, Alameda County Public Health, WHEELS (local transit company), YMCA, County Welfare / Food Stamp Program, ECHO Housing, Senior Support of the Tri-Valley, County Behavioral Health, Abode Services, Easter Seals, Community Resources for Independent Living (CRIL),

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DCARA (Deaf Counseling, Advocacy, and Referral Agency), East Bay Innovations, Shepherd's Gate homeless shelter, Open Heart Kitchen, Axis Community Health, Tri-Valley Haven, Hayward, Day Labor Center, National Association on Mental Illness, Horizons Family Counseling, CAPE (Community Association for Preschool Education), Tri-Valley Housing Opportunity Center, local churches and faithbased groups, and others. In 2014, the Pleasanton HSC adopted a Strategic Plan to provide an implementation strategy for addressing the needs identified in the study (http://www.cityofpleasantonca.gov/pdf/HS-Strategic-Plan-2014.pdf).

PR-15 Citizen 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

All aspects of programs administered by the City are conducted with freedom of access for all interested persons. Citizens are encouraged to be involved in the development of programs offered by the City including recommending program policies and funding, the five year Consolidated Plan, Annual Action Plan, Substantial Amendments to the Consolidated/Action Plans, Consolidated Annual Performance and Evaluation Report (CAPER), and the Citizen Participation Plan. Community participation is a very important part of the Consolidated Plan development process. As noted in the preceding section, many organizations were contacted during the development period both locally and at the County level.

As described earlier, the City maintains an active database of potential interested parties and uses it to send out notification of grant funding opportunities at the beginning of every application cycle (early December) which is also the beginning of the annual Action Plan (and Consolidated Plan) process. The list currently includes approximately 250 nonprofit agencies, individuals, and other interested parties. In addition, ads are placed in local newspapers (including the Pleasanton Weekly which is distributed to every household in Pleasanton) and on the City's web site. Interested parties have multiple opportunities to participate and provide input on the process starting with annual grant workshops in early December through the annual CAPER hearing held annually in August.

A pre-draft public hearing on the Consolidated Plan and Analyisis of Impediments to Fair Housing Choice (AI) took place on January 13, 2015 at the Housing and Community Development Advisory Committee meeting. The purpose of the meeting was to present an overview of the Consolidated Plan and AI, and review and solicit input on the housing and community development needs in the HOME Consortium. No public comments were received.

The 30-day public comment period for the Consolidated Plan will take place from April 9 - May 8, 2015. A public hearing will be held on April 16, 2015, to take comments on the draft HOME Consortium Consolidated Plan. Public Notices are placed in the following newspapers: Alameda Times Star, Oakland Tribune, Hayward Daily Review, Fremont Argus and the Tri-Valley Herald. Any comments are recorded in the meeting.

The draft Consolidated Plan will be distributed to all cities and main library branches in Alameda County, HUD, and any interested citizens, organizations, or agencies. The City will also post the draft and final plans on its web site. Once the Consolidated Plan is adopted, it will be made available along with any substantial amendments (if necessary) and the annual performance reports made to the general public.

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Additional local citizen participation and outreach efforts are described below.

Citizen Participation Outreach

So	rt 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)

Table 4– Citizen Participation Outreach

Needs Assessment

NA-05 Overview

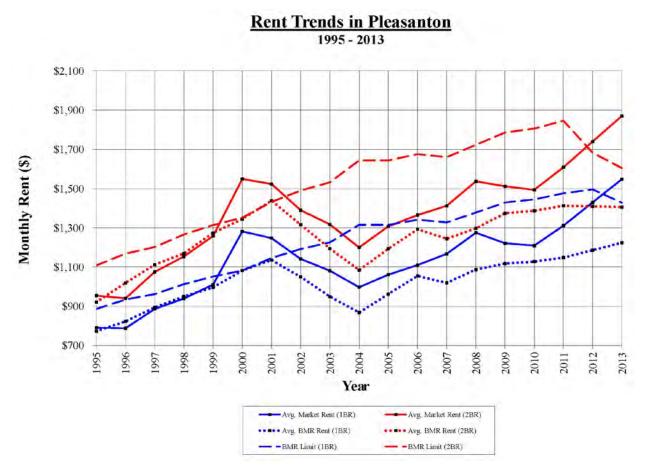
Needs Assessment Overview

According to the 2010 U.S. Census, Pleasanton experienced population growth of approximately 11% from 2000 (63,645) to 2010 (70,711). Overall increases in population require planning for new housing, as well as rehabilitation of existing housing stock and efforts to keep the existing housing stock affordable. The Alameda County HOME Consortium has conducted a Housing Needs Assessment, Housing Market Analysis and Homelessness Analysis to provide an overview of the current state of housing and homelessness within the HOME Consortium. The results are provided in the County's section of the Consolidated Plan.

As noted countywide, the recent economic recession substantially increased the number of households with cost burdens and other housing problems both nationally and statewide. While economic conditions have improved throughout Alameda County, the housing market recovery has been slow, resulting in continued housing need. Pleasanton has fared relatively well in terms of a lower rate of foreclosures and property value decline as compared to other cities in Alameda County. At the same time, Pleasanton's position at or near the top of housing costs (for both for-sale and rental housing) enhances challenges for its residents.

As with the County and greater Bay Area region, rental rates have increased significantly and rapidly in Pleasanton since 2010 based on the City's annual survey efforts as well as market data. Statistics available from the Bay East Association of Realtors (www.bayeast.org) support a similar trend for ownership housing in Pleasanton as compared to other areas of the county and region.

The Consortium's housing needs center on cost burdening, affordability, and changing demographics. The Consortium's homeless needs center on identifying homeless populations and the resources currently available. Non-homeless special needs are included in the housing needs and non-housing community development needs. Additionally special needs populations are identified and current resources categorized.



Rent Trends in Pleasanton, 1995-2013

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NA-50 Non-Housing Community Development Needs - 91.415, 91.215 (f)

Describe the jurisdiction's need for Public Facilities:

The collective results of a community survey and performance measures (discussed below) offer an informative perspective on how city resources are allocated and measured organizationally. The survey reflects the community's qualitative attitudes surrounding City services while the performance metrics issue a quantitative glimpse of the organization. These results feed into the City's Capital Improvement Program (CIP), which is a four-year financial plan for capital improvement projects identifying the capital needs required to maintain and expand public facilities and infrastructure such as streets, parks, and water and sewer systems. Most projects in the CIP are funded with local sources.

How were these needs determined?

In 2013 the City established a priority to initiate performance measures that would be assessed annually to measure progress and set meaningful targets for key service areas to the public such as public safety, dependable infrastructure, economic development, and library and recreation services. Ongoing, the goal is to measure against data from previous years and to set meaningful targets for key service areas. Targets are generally derived from approved general plans, master plans, as well as internal and external benchmarks and established industry standards. By measuring programs using a variety of data, the City can see how Pleasanton's present state relates to its past indicators and future goals and objectives.

Concurrently, a community survey was conducted to determine the top concerns of Pleasanton residents, their attitudes toward city government, and how much they use city services and interface with city staff. Using the new metric platform in tandem with the results of the community survey, we were able to set a benchmark in which to gauge performance. The methodology used for the community survey was a telephone survey of 600 randomly selected Pleasanton voters, with a margin of sampling error of +/-3.7 % at the 95% confidence level. The key findings of the telephone survey revealed that Pleasanton residents have exceptionally high levels of satisfaction with the local quality of life and city services, with seven in ten residents identifying the city as an excellent place to live. Polled residents also gave the City high marks on public safety services and its protection of water quality. Interestingly, the longer residents live here, the higher they rate the city. We also found that 97% of those polled considered Pleasanton an excellent or good place to raise children.

Describe the jurisdiction's need for Public Improvements:

See above.

How were these needs determined?

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See above.

Describe the jurisdiction's need for Public Services:

The detailed results from the 2011 Tri-Valley Human Services Needs Assessment (discussed below) are available on the City's web site at http://www.cityofpleasantonca.gov/civicax/filebank/blobdload.aspx?BlobID=24607.

How were these needs determined?

In 2011, Resource Development Associations (RDA), a local consulting firm specializing in strategic planning and evaluation for local government and nonprofit entities, facilitated a broad-based community-driven assessment of human service needs in Eastern Alameda County (commissioned jointly by the Tri-Valley cities of Pleasanton, Livermore, and Dublin). The effort resulted in the adoption in late 2011 of the Tri-Valley Human Services Needs Assessment which identified strengths as well as gaps in human services in the Tri-Valley region (the full study is available on the City's web site at http://www.cityofpleasantonca.gov/civicax/filebank/blobdload.aspx?BlobID=24607). In addition to multi-jurisdictional collaboration, the study involved several community surveys as well as direct consultation with a large number of nonprofit agencies, individuals, and other interested parties in a variety of settings and formats (e.g., key informant interviews, focus discussion groups, etc.). Agencies consulted included Child Care Links, Alameda County Public Health, WHEELS (local transit company), YMCA, County Welfare / Food Stamp Program, ECHO Housing, Senior Support of the Tri-Valley, County Behavioral Health, Abode Services, Easter Seals, Community Resources for Independent Living (CRIL), DCARA (Deaf Counseling, Advocacy, and Referral Agency), East Bay Innovations, Shepherd's Gate homeless shelter, Open Heart Kitchen, Axis Community Health, Tri-Valley Haven, Hayward, Day Labor Center, National Association on Mental Illness, Horizons Family Counseling, CAPE (Community Association for Preschool Education), Tri-Valley Housing Opportunity Center, local churches and faithbased groups, and others. In 2014, the Pleasanton HSC adopted a Strategic Plan to provide an implementation strategy for addressing the needs identified in the study (http://www.cityofpleasantonca.gov/pdf/HS-Strategic-Plan-2014.pdf).

Housing Market Analysis

MA-05 Overview

Housing Market Analysis Overview:

The Housing Market Analysis examines current and projected population figures, income levels, ethnic composition, and age composition to obtain a profile of the residents who make up the Consortium's housing market. It also describes characteristics of the housing stock, including general supply, condition, and housing available to people with special needs. The Housing Market Analysis also includes a profile of public and other assisted housing available, and the supportive housing, services, and facilities available for special needs populations.

The Alameda County 2015 Analysis of Impediments to Fair Housing found that the lack of affordable housing results in significant hardships for low-income households, preventing them from meeting other basic needs. Moderate income households are also increasingly being affected by the raising costs of housing and associated costs (taxes, insurance, homeowners' association fees, and home maintenance and repairs). Because home ownership is out of reach for many residents, low- and moderate-income households generally rent their homes as opposed to purchasing one. Of the 362,604 occupied housing units located in the Consortium, 60.5% are owner-occupied and the other 39.5% of homes are occupied by tenants.

Household incomes vary greatly across Consortium jurisdictions. Pleasanton is the highest-income entitlement jurisdiction with a median household income of \$111,200 in 2014. It also has the newest housing stock with a median year built of 1983, just over 20 years old. Pleasanton is among the five Consortium jurisdictions with the highest volume of all single-family home sales in the first half of 2014. These cities (Pleasanton, Fremont, Hayward, Livermore, and San Leandro) account for half of all sales in the County, and nearly two-thirds of sales in the Consortium, during that period. The median sales price in Pleasanton in 2014 was \$874,500 for single family units and \$463,500 for condominiums which was significantly above the county-wide averages of \$605,000 and \$405,000, respectively.

As of July 2014, the average monthly rent across all Consortium jurisdictions is \$1,819, up from \$1,360 in 2009. Average rents are highest in Pleasanton, Dublin, and Emeryville, where rents range from \$2,030 to \$2,410. During the same period, the highest vacancy rate in the Consortium was found to be in Pleasanton (4.2 percent). However, this rate is significantly lower than the rate of 5.0 percent, which is generally viewed by housing economists as the level sufficient to provide adequate choice and mobility for households in the rental market. More recent anecdotal data indicate that the vacancy rate has likely decreased further during the past year. The extremely low vacancy rates throughout the Consortium indicate a tight rental housing market in Alameda County, where options for renter households are highly constrained.

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

Introduction

Economic Development Market Analysis

Business Activity

Business by Sector	Number of Workers	Number of Jobs	Share of Workers %	Share of Jobs %	Jobs less workers %
Agriculture, Mining, Oil & Gas Extraction	180	31	1	0	-1
Arts, Entertainment, Accommodations	2,323	4,118	9	9	0
Construction	1,258	2,150	5	5	0
Education and Health Care Services	3,401	5,182	14	12	-2
Finance, Insurance, and Real Estate	1,688	2,956	7	7	0
Information	1,311	2,754	5	6	1
Manufacturing	3,679	2,699	15	6	-9
Other Services	1,062	1,202	4	3	-1
Professional, Scientific, Management Services	5,074	13,156	21	29	8
Public Administration	0	0	0	0	0
Retail Trade	2,516	6,728	10	15	5
Transportation and Warehousing	664	928	3	2	-1
Wholesale Trade	1,583	2,741	6	6	0
Total	24,739	44,645			

Table 5 - Business Activity

Data Source: 2007-2011 ACS (Workers), 2011 Longitudinal Employer-Household Dynamics (Jobs)

Labor Force

Total Population in the Civilian Labor Force	36,372
Civilian Employed Population 16 years and over	33,765
Unemployment Rate	7.17

Unemployment Rate for Ages 16-24	14.70
Unemployment Rate for Ages 25-65	5.20
Table 6	- Labor Force

Data Source: 2007-2011 ACS

Occupations by Sector	
Management, business and financial	14,490
Farming, fisheries and forestry occupations	955
Service	2,214
Sales and office	7,619
Construction, extraction, maintenance and	
repair	1,542
Production, transportation and material moving	1,016

Table 7 – Occupations by Sector

Data Source: 2007-2011 ACS

Travel Time

Travel Time	Number	Percentage
< 30 Minutes	17,077	55%
30-59 Minutes	10,048	32%
60 or More Minutes	3,979	13%
Total	31,104	100%

Data Source: 2007-2011 ACS

Table 8 - Travel Time

Education:

Educational Attainment by Employment Status (Population 16 and Older)

Educational Attainment	In Labor Force		
	Civilian Employed	Unemployed	Not in Labor Force
Less than high school graduate	1,067	105	302
High school graduate (includes equivalency)	2,777	280	968

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Educational Attainment	In Labor Force		
	Civilian Employed	Unemployed	Not in Labor Force
Some college or Associate's degree	7,177	605	2,169
Bachelor's degree or higher	18,049	1,009	3,933

Data Source: 2007-2011 ACS

Table 9 - Educational Attainment by Employment Status

Educational Attainment by Age

	Age				
	18–24 yrs	25–34 yrs	35–44 yrs	45–65 yrs	65+ yrs
Less than 9th grade	234	88	193	206	362
9th to 12th grade, no diploma	382	175	363	449	489
High school graduate, GED, or alternative	1,729	856	825	2,344	2,068
Some college, no degree	1,383	1,401	1,841	3,270	1,459
Associate's degree	306	704	706	2,040	511
Bachelor's degree	843	2,718	4,357	6,919	1,458
Graduate or professional degree	112	1,384	3,059	4,567	940

Data Source: 2007-2011 ACS

Table 10 - Educational Attainment by Age

Educational Attainment – Median Earnings in the Past 12 Months

Educational Attainment	Median Earnings in the Past 12 Months
Less than high school graduate	21,200
High school graduate (includes equivalency)	38,494
Some college or Associate's degree	51,590
Bachelor's degree	80,140
Graduate or professional degree	107,231

Table 11 – Median Earnings in the Past 12 Months

Data Source: 2007-2011 ACS

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

Based on the City's Economic Development Strategic Plan adopted in October 2013, Pleasanton's largest industry sectors are Information; Professional, Scientific, and Technical Services; Retail Trade; Manufacturing; and Finance and Insurance. Of these, the Information and Professional, Scientific, and Technical sectors have experienced rapid employment growth in Pleasanton relative to the Tri-Valley and East Bay, and the Information and Finance and Insurance industries are heavily concentrated in Pleasanton compared to the Tri-Valley. However, the Finance and Insurance sector has experienced slow growth relative to the Tri-Valley overall as Pleasanton has further specialized in technical fields compared to places like Dublin and San Ramon.

Describe the workforce and infrastructure needs of the business community:

- Pleasanton's population historically grew very rapidly relative to the larger region, but this growth is now likely to slow, especially compared to Tri-Valley peer cities.
- The city remains a family-focused community that features highly-educated and high-income residents drawn to its excellent schools and general quality of life.
- There is a need to ensure that the city's housing stock accommodates Pleasanton's diverse household types including smaller households, renters, and aging seniors. Recently approved and proposed multi-family housing developments will help meet the need for additional and more diverse types of housing.
- Pleasanton is a jobs-rich community with a high rate of workers commuting into the city for work; nearly one-quarter of those workers commute via alternatives to driving alone thanks to BART and other access options, but local businesses desire improved local transit options. Alternatives to driving will become increasingly important as freeway congestion grows.
- Pleasanton's high in-commute rates and high ratios of jobs to employed residents and housing suggest that the city has a shortage of workforce housing. This may pose a challenge for future competitiveness if traffic congestion increases and job growth continues to outpace housing growth.
- The newer business park areas in Pleasanton do not generate significant cost to the city, due to the fact that they contribute their own resources toward public safety and maintenance of facilities and infrastructure internal to the area (e.g., Hacienda Owners Association has its own security patrols and maintains the landscaping, lighting, traffic signals, sidewalks, street furniture, and other public amenities and infrastructure per an agreement with the City of Pleasanton that expires in 2039). Older business areas, such as Valley and Stanley Business Parks, have infrastructure needs and place greater demands on the City.

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

Pleasanton faces increased competition for retail sales, and many of its existing unanchored centers may require reinvestment or repositioning. Competing retail offerings at Dublin and Livermore are an ongoing threat to Pleasanton's retail dominance. These centers offer "big box" stores and lifestyle center formats not found in Pleasanton. In addition, many of the City's older, unanchored shopping centers generate relatively low taxable revenues per square foot – approximately half of that generated by anchored, larger centers. To stay competitive, smaller unanchored shopping centers and Downtown Pleasanton may require strategic reinvestment and possible expansion or redevelopment (most of these efforts will involve private sector investment). Pleasanton's attractions and amenities may not be well known to leisure visitors. While Pleasanton and the Tri-Valley have successfully attracted business travelers, there is a need to raise awareness about the unique assets in the City, including the Alameda County Fairgrounds, Downtown Pleasanton, arts, and other amenities to increase leisure visitation to Pleasanton. The City's Economic Development Strategic Plan includes a specific policy to collaborate with the Pleasanton Downtown Association and downtown business/property owners to create and implement a retail recruitment and retention strategy specifically targeted to downtown.

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

Within the Tri-Valley, office/flex locations near the I-580/I-680 interchange and BART stations are most appealing to businesses. Locations near the I-580/I-680 interchange and BART tend to be most desirable for office/flex users due to their excellent access to the regional workforce and other destinations. Data indicate that there is a relatively high workforce population in the region that is suited to the number and type of higher wage jobs available in Pleasanton. However, as noted earlier, there appears to be a gap in housing (both quantity and affordability) to accommodate lower wage workers.

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

Most workforce training initiatives are market driven and do not involve direct City support or administration. The City's efforts are primarily focused on addressing employment issues as they relate to housing and income. To address this, the City has operated the Tri-Valley Housing Scholarship Program (TVHSP) since the 1990's in partnership with Abode Services. The TVHSP provides temporary (up to two years) housing

subsidies for residents who are in educational and job training programs with a goal of achieving a higher living wage to enable self-sufficiency. Las Positas Community College is one of the partners in the program. The TVHSP supports Pleasanton's Consolidated Plan priorities to increase the availability of affordable rental housing and to prevent homelessness.

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

No

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

Discussion

MA-50 Needs and Market Analysis Discussion

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

As with the Consortium at large, the most common housing problem for low to moderate-income households in Pleasanton is cost burden. Renters struggle to afford rental rates and low-income homeowners (particularly single-parent households and seniors on fixed incomes) struggle to afford the cost of household maintenance and repairs. In the latter case, poorly-maintained homes lead to additional repair problems, higher utility costs, etc., further restricting household funds and contributing to the deterioration of housing units. While the number and percentage of cost burdened households in Pleasanton is less than the average throughout the Consortium, the affordability gap is larger because Pleasanton has the highest rents and ownership housing costs within the entire region as noted earlier.

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

The Consortium overall has a diverse population with no one race comprising a majority in 2014. The population of Pleasanton is less diverse although the past decade has seen a trend toward greater diversity. White (non-Hispanic) persons account for 57.2% of the population (32.4% Consortium-wide), while Asians represent 25.6% (31.2% Consortium-wide). Hispanics and Latinos represent 11.6% of the population (23.9% Consortium-wide). Black or African American persons represent 2% (6.8% Consortium-wide), followed by smaller percentages of other races (e.g., Native American, Native Hawaiian / Pacific Islander), mixed race or other.

There are several methods recognized by HUD for defining areas of minority concentration. One method defines areas of minority concentration as census tracts where more than 50% of the population is comprised of a single ethnic or racial group. Another way to define minority concentration is an area where the percentage of all minorities is at least 20% above the overall percentage for the Consortium-wide minority population percentage. Pleasanton does not have any areas of racial or ethnic minority concentration under either definition. Similarly, Pleasanton does not have any concentrations with regard to household income.

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

Not applicable.

Are there any community assets in these areas/neighborhoods?

Not applicable.

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Are there other strategic opportunities in any of these areas?

Not applicable.

Strategic Plan

SP-05 Overview

Strategic Plan Overview

Pleasanton's section of the HOME Consortium's Strategic Plan will identify the City's own priority needs and describe strategies that the City will undertake to serve the priority needs. The priorities were developed from the analysis in the Needs Assessment and Market Analysis, in addition to community input.

The Consortium updated its Analysis of Impediments to Fair Housing Choice (AI) in January 2015. The AI identified strategies for removing or ameliorating negative effects of public policies that serve as barriers to affordable housing. Policies include tax policy affecting land and other property, land use controls, zoning ordinances, building codes, fees and charges, growth limits, and policies that affect the return on residential investment.

The housing needs strategy was developed by analyzing the characteristics of the housing market; particularly how the Consortium could use HOME and CDBG funds for rental assistance, production of new units, rehabilitation of existing units, and acquisition of existing units. The three Public Housing Agencies in the Consortium (Alameda County, City of Alameda and City of Livermore Housing Authorities) were consulted to develop the plan to meet the needs of public housing residents and public housing developments. The Alameda County Healthy Homes Department was consulted for strategies to evaluate and reduce lead-based paint hazards. EveryOne Home, Alameda County's Continuum of Care, was consulted for assistance in developing the plan for reducing and ending homelessness. These activities will primarily be funded with Emergency Solutions Grant, HOME Tenant-Based Rental Assistance and CDBG Funds.

The Consortium's Strategic Plan will estimate the HOME, CDBG and ESG resources that will be available to address the Consortium's priority needs. Pleasanton will report on its direct use of CDBG resources, while HOME and ESG resources are reported on a Consortium level.

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

Geographic Area

General Allocation Priorities

Describe the basis for allocating investments geographically within the state

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

The City of Pleasanton contracts with Neighborhood Solutions to administer a Housing Rehabilitation Program (HRP) using primarily CDBG funds for eligible low-income home owners and renters in Pleasanton. The goal of the program is to conserve, preserve, and improve the housing and neighborhoods by addressing the needs of low income Pleasanton residents. To that end, the program provides grants or low interest loans to qualifying properties and owners to provide a variety of rehabilitation services, such as rental housing rehabilitation, minor and major home repairs, mobile home repairs, exterior paint or clean-up assistance, seismic retrofitting, and accessibility improvements. Based on past experience, units benefitting from the HRP have been spread throughout the community although mobile home grants are by definition focused in the two largest mobile home parks at 3231 and 3263 Vineyard Avenue in east Pleasanton. These two parks are primarily occupied by low-income seniors.

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

HOME Investment Partnership funding is allocated to the jurisdictions within the Alameda County HOME Consortium on a formula basis. HOME funds are distributed throughout all parts of the HOME Consortium. All activities to be undertaken are intended and open to serve eligible households living in the Consortium.

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

Priority Needs

Tab	able 12 – Priority Needs Summary					
1	Priority Need	Rental Housing Production				
	Name					
	Priority Level	High				
	Population	Extremely Low				
		Low				
		Large Families				
		Families with Children				
		Elderly				
		Public Housing Residents				
		Chronic Homelessness				
		Individuals				
		Families with Children				
		Mentally III				
	veterans					
	Victims of Domestic Violence					
		Elderly				
		Frail Elderly				
		Persons with Mental Disabilities				
		Persons with Physical Disabilities				
		Persons with Developmental Disabilities				
		Victims of Domestic Violence				
	Geographic	[Not Applicable]				
	Areas					
	Affected					
	Associated	Preservation - Rental				
	Goals	Affordable Rental Housing				
	Description	Increase the availability of affordable rental housing for extremely low income				
		(30%), very low (50%), and low income (80%) households.				

Table 12 – Priority Needs Summary

	Basis for	
	Relative	The need for affordable rental housing in Alameda County has increased
	Priority	dramatically in the past ten years. The need for truly affordable units targeted to low, very low, and extremely low income households far exceeds the supply of affordable rental housing in the Alameda County HOME Consortium. The Alameda County HOME Consortium Housing Needs Analysis indicates that the majority of low income rental households (earning 80 percent or less of the Area Median Income, or AMI) spend more than 30% of their incomes on housing costs.
		Affordable housing is in short supply throughout the county. Very high cost housing markets reduce the supply of affordable housing even further. During the past several years, the effect has been exacerbated by increased competition in the rental market due from former homeowners who have been displaced due to foreclosure. As rents increase, subsidies in rental assistance programs also increase, which results in a reduction in the number of persons that can be served in these programs.
2	Priority Need	Housing Preservation
	Name	
	Priority Level	High
	Population	Extremely Low
		Low
		Large Families
		Families with Children
		Elderly
		Public Housing Residents
		Chronic Homelessness
		Individuals
		Families with Children
		Victims of Domestic Violence
		Elderly
		Frail Elderly
		Persons with Mental Disabilities
		Persons with Physical Disabilities
		Persons with Developmental Disabilities
		Victims of Domestic Violence
	Geographic	[Not Applicable]
	Areas	
	Affected	
	Associated	Preservation - Rental
	Goals	Preservation - Owner

	Description	Preserve existing affordable rental and ownership housing households at or below
	Description	80% of Area Median Income (AMI).
	Basis for	N/A
	Relative	
	Priority	
3	Priority Need	First Time Homebuyer
	Name	
	Priority Level	Low
	Population	Low
	-	Moderate
		Large Families
		Families with Children
	Geographic	[Not Applicable]
	Areas	
	Affected	
	Associated	First Time Homebuyer
	Goals	
	Description	Assist low and moderate income first time homebuyers.
	Basis for	N/A
	Relative	
	Priority	
4	Priority Need	Fair Housing
	Name	
	Priority Level	High
	Population	Extremely Low
		Low
		Moderate
		Middle
		Large Families
		Families with Children
		Elderly
		Public Housing Residents
		Elderly
		Frail Elderly
		Persons with Mental Disabilities
		Persons with Physical Disabilities
		Persons with Developmental Disabilities
		Persons with Alcohol or Other Addictions
		Persons with HIV/AIDS and their Families
		Victims of Domestic Violence
		Non-housing Community Development

	Geographic	[Not Applicable]		
	Areas			
	Affected			
	Associated	Reduction of Housing Discrimination		
	Goals			
	Description	Reduce housing discrimination		
	Basis for	N/A		
	Relative			
	Priority			
5	Priority Need	Homelessness		
	Name			
	Priority Level	High		
	Population	Extremely Low		
		Low		
		Moderate		
		Middle		
		Large Families		
		Families with Children		
		Elderly		
		Public Housing Residents		
		Rural		
		Chronic Homelessness		
		Individuals		
	Families with Children			
	Mentally III			
		Chronic Substance Abuse		
		veterans		
		Persons with HIV/AIDS		
		Victims of Domestic Violence		
		Unaccompanied Youth		
	Geographic	[Not Applicable]		
	Areas			
	Affected			
Associated Homelessness Prevention		Homelessness Prevention		
	Goals			
	Description			
		Maintain, improve and expand (as needed) the capacity of housing, shelter and		
1		services for homeless individuals and families including integrated healthcare,		
		employment services and other supportive services.		

	Basis for	N/A
	Relative	
	Priority	
6	Priority Need	Supportive Housing
	Name	
	Priority Level	High
	Population	Extremely Low
		Low
		Moderate
		Middle
		Large Families
		Families with Children
		Elderly
		Public Housing Residents
		Elderly
		Frail Elderly
		Persons with Mental Disabilities
		Persons with Physical Disabilities
		Persons with Developmental Disabilities
Persons with HIV/AIDS and their Families		Persons with HIV/AIDS and their Families
		Victims of Domestic Violence
	Geographic	[Not Applicable]
	Areas	
	Affected	
	Associated	Service Enriched Housing
	Goals	
	Description	Increase the availability of service-enriched housing for persons with special
		needs.
	Basis for	N/A
	Relative	
	Priority	
7	Priority Need	Community Development - Health Care Access
	Name	
	Priority Level	High

	Population	Extremely Low
	-	Low
		Large Families
		Families with Children
		Elderly
		Public Housing Residents
		Chronic Homelessness
		Individuals
	Families with Children	
	Mentally III	
		Chronic Substance Abuse
		veterans
		Persons with HIV/AIDS
		Victims of Domestic Violence
		Unaccompanied Youth
		Elderly
		Frail Elderly
		Persons with Mental Disabilities
		Persons with Physical Disabilities
		Persons with Developmental Disabilities
		Persons with Alcohol or Other Addictions
		Persons with HIV/AIDS and their Families
		Victims of Domestic Violence
		Non-housing Community Development
	Geographic	[Not Applicable]
	Areas	
	Affected	
	Associated	Improved Health Care Access
	Goals	
	Description	Improve community health and access to basic and specialty care including dental
		and optometry care, behavioral and mental health care services particularly for
		low income, uninsured and under-insured residents with emphasis on activities
		that 1) support the maintenance and expansion of services and programs aimed at
		wellness and preventative care services; and 2) increase outreach and access for
		underserved populations including limited English speaking persons, youth,
		disabled, seniors and homeless persons.
	Basis for	N/A
	Relative	
	Priority	
8	Priority Need	Community Development - Youth Opportunities
	Name	

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	Priority Level	Low
	Population	Extremely Low
		Low
		Moderate
		Middle
		Large Families
		Families with Children
		Unaccompanied Youth
Geographic [Not Applicable]		[Not Applicable]
	Areas	
	Affected	
	Associated	Improve Opportunities for Youth
	Goals	
	Description	
		Increase and maintain affordable and accessible wellness and development
		opportunities for youth that are age-appropriate.
	Basis for	N/A
	Relative	
	Priority	
9	Priority Need	Community Development - Seniors
	Name	
	Name Priority Level	High
		High Extremely Low
	Priority Level	Extremely Low Low
	Priority Level	Extremely Low Low Moderate
	Priority Level	Extremely Low Low Moderate Middle
	Priority Level	Extremely Low Low Moderate Middle Elderly
	Priority Level	Extremely Low Low Moderate Middle Elderly Elderly
	Priority Level Population	Extremely Low Low Moderate Middle Elderly Elderly Frail Elderly
	Priority Level Population Geographic	Extremely Low Low Moderate Middle Elderly Elderly
	Priority Level Population Geographic Areas	Extremely Low Low Moderate Middle Elderly Elderly Frail Elderly
	Priority Level Population Geographic Areas Affected	Extremely Low Low Moderate Middle Elderly Elderly Frail Elderly [Not Applicable]
	Priority Level Population Geographic Areas Affected Associated	Extremely Low Low Moderate Middle Elderly Elderly Frail Elderly
	Priority Level Population Geographic Areas Affected Associated Goals	Extremely Low Low Moderate Middle Elderly Elderly Frail Elderly [Not Applicable] Improve Opportunities for Seniors
	Priority Level Population Geographic Areas Affected Associated	Extremely Low Low Moderate Middle Elderly Elderly Frail Elderly [Not Applicable] Improve Opportunities for Seniors Support and expand programs and opportunities that keep seniors engaged and
	Priority Level Population Geographic Areas Affected Associated Goals Description	Extremely Low Low Moderate Middle Elderly Elderly Frail Elderly [Not Applicable] Improve Opportunities for Seniors Support and expand programs and opportunities that keep seniors engaged and involved in their community.
	Priority Level Population Geographic Areas Affected Associated Goals Description Basis for	Extremely Low Low Moderate Middle Elderly Elderly Frail Elderly [Not Applicable] Improve Opportunities for Seniors Support and expand programs and opportunities that keep seniors engaged and
	Priority Level Population Geographic Areas Affected Associated Goals Description	Extremely Low Low Moderate Middle Elderly Elderly Frail Elderly [Not Applicable] Improve Opportunities for Seniors Support and expand programs and opportunities that keep seniors engaged and involved in their community.

10	Priority Need	Community Development - Emerging Community Needs						
	Name							
	Priority Level	High						
	Population	Extremely Low						
		Low						
		Moderate						
		Middle						
Large Families		Large Families						
		Families with Children						
		Elderly						
		Public Housing Residents						
		Chronic Homelessness						
		Individuals						
		Families with Children						
		Mentally III						
		veterans						
		Persons with HIV/AIDS						
		Victims of Domestic Violence						
		Elderly						
		Frail Elderly						
Persons with Mental Disabilities Persons with Physical Disabilities Persons with Developmental Disabilities		Persons with Mental Disabilities						
		·						
		Persons with Alcohol or Other Addictions						
		Persons with HIV/AIDS and their Families						
		Victims of Domestic Violence						
	Geographic	[Not Applicable]						
	Areas							
	Affected							
	Associated	Address Emerging Community Needs						
	Goals							
	Description	Foster and encourage innovative programs that meet emerging community needs						
		with emphasis on low income and underserved populations.						
	Basis for	N/A						
	Relative							
	Priority							
11	Priority Need	Community Development - Infrastructure Improvement						
	Name							
	Priority Level	Low						

	Population	Extremely Low					
		Low					
		Moderate					
		Middle					
		Non-housing Community Development					
	Geographic	[Not Applicable]					
	Areas						
	Affected						
	Associated	Improve Public Service Support					
	Goals						
	Description	Capital improvement projects					
	Basis for	N/A					
	Relative						
	Priority						
12 Priority Need Comm		Community Development - Economic Development					
Name							
Priority Level Low		Low					
	Population	Non-housing Community Development					
	Geographic	[Not Applicable]					
	Areas						
	Affected						
	Associated	Promote Economic Development Opportunities					
	Goals						
	Description	Downtown economic development					
	Basis for	N/A					
	Relative						
	Priority						

Narrative (Optional)

N/A

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

Anticipated Resources

Program	Source of	Uses of Funds	Expe	cted Amoun	t Available Yea	ar 1	Expected	Narrative Description
	Funds		Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$	Amount Available Reminder of ConPlan \$	
CDBG	public - federal	Acquisition Admin and Planning Economic Development Housing Public Improvements Public Services	268,922	30,000	0	298,922	1,180,000	Program income is an estimate based on projected repayment of past CDBG- funded loans issued through the City's Housing Rehabilitation Program.

Table 13 - Anticipated Resources

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

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 HHSG funding application review process.
- Support the purchase and rehabilitation and new construction of units by nonprofit housing developers.
- Promote private sector rehabilitation through the City's Housing Rehabilitation Program (HRP).

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- Continue participation in programs to support affordable homeownership.
- Continue to provide support to nonprofit, community-based housing developers and service providers in obtaining other sources of financing.
- Promote joint development with other governmental or 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 state that may be used to address the needs identified in the plan

The City will utilize publically owned land (approximately 5 acres) for the Kottinger Gardens project which involves the redevelopment of two aging senior housing facilities (240 / 251 Kottinger Drive) with a total of 90 existing units. The new project, when complete, will have a total of 185 units.

Discussion

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

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

Responsible Entity	Responsible Entity Type	Role	Geographic Area Served
PLEASANTON	Government	Economic	Region
		Development	
		Homelessness	
		Non-homeless special	
		needs	
		Ownership	
		Planning	
		Public Housing	
		Rental	
		neighborhood	
		improvements	
		public facilities	
		public services	
Alameda County HCD	Government	Economic	Region
	Coveninent	Development	
		Homelessness	
		Non-homeless special	
		needs	
		Ownership	
		Planning	
		Rental	
		neighborhood	
		improvements	
		public facilities	
		public services	
Neighborhood Solutions	Subrecipient	Ownership	Region
Neighborhood Solutions	Subrecipient	Rental	Region
EveryOne Home		Homelessness	Region
Everyone nome			Region
ECHO HOUSING	Other	Planning Ownership	Region
		Public Housing	REGION
		Rental	
	Non profit		Degion
EDEN I&R	Non-profit	Homelessness	Region
	organizations	Public Housing	
		Rental	

Table 14 - Institutional Delivery Structure

Consolidated Plan

Assess of Strengths and Gaps in the Institutional Delivery System

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 (TAC) which is comprised of staff from the member jurisdictions and the County. The 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.

The Tri-Valley cities of Pleasanton, Livermore, and Dublin have a long-standing history of collaboration around housing and community issues as exemplified in the following joint efforts:

- The cities collaborate annually around the federal grant process, holding joint meetings for NOFA / application distribution, contract submission, subrecipient monitoring, and reporting. Staff have worked together to develop standard applications, contracts, and monitoring tools which have improved standardization and resulted in time and cost savings for cities as well as subrecipients. All three cities utilize the same on-line application system (ZoomGrants) which provides a further benefit and convenience to subrecipients.
- As noted earlier, the three cities collaborated on the completion of the Tri-Valley Human Services Needs Assessment in 2011. This multi-jurisdictional effort contributed toward the consistency of policies and programs throughout the subregion while still allowing a degree of independence to include local needs and priorities.
- The cities have collaborated on two Section 108 loans in order to secure federal funds in an amount larger than any one jurisdiction could support on its own. These funds were obtained in 2002 to acquire and rehabilitate a family crisis shelter and more recently in 2015 to construct a community medical clinic. Although one city had to serve as the lead agency (Livermore in 2002; Pleasanton in 2015), in both cases the cities entered into an agreement to share repayment of the loans.
- The cities collaborated in 2005 to open the Tri-Valley Housing Opportunity Center (TVHOC) as a clearing house to provide home buyer education and coordinate the delivery of housing services on a regional basis. The TVHOC started out initially with a focus on first-time home buyer programs but its mission has expanded to address emerging priorities such as foreclosure prevention and income tax preparation assistance.

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.

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

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

Table 15 - Homeless Prevention Services Summary

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

The County's section of the Consolidated Plan includes a detailed description of county-level stakeholders and services. Many of these provide direct services in Pleasanton and other East County jurisdictions.

Key stakeholders in Pleasanton include Axis Community Health (community clinics, public benefits coordination), Pleasanton Unified School District (student health programs), Tri-City Health Center (East County AIDS Advocacy), Tri-Valley Haven (food bank; domestic violence and family shelters), Open Heart Kitchen (family and senior food programs), Spectrum Community Services (meal delivery programs), ECHO Housing (housing counseling and tenant-landlord services), Abode Services (homelessness prevention), Legal Assistance for Seniors (free legal aid for seniors), Community Resources for Independent Living (disabled advocacy and support), East Bay Innovations (disabled advocacy and support), CALICO (child abuse intervention), Bay Area Community Services (mental and disabled services), and Eden Information and Referral (2-1-1 Alameda County information line).

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

The service delivery system for persons experiencing homelessness is primarily coordinated at the County level. A detailed description of the network is included in the County's section of the Consolidated Plan.

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

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 housing providers and service providers, particularly those addressing housing needs of the homeless and special needs populations. As described earlier, the cities of Pleasanton, Livermore, and Dublin have a long-standing history of collaboration on a variety of housing and community development matters, and the cities continue to build on this 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 through the implementation in 2010 of its new Housing and Human Services Grant (HHSG) program which also uses a web-based grant management system (ZoomGrants). 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, and may participate in more focused subregional efforts in the near future.

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

Goals Summary Information

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
1	Affordable Rental	2015	2019	Affordable		Rental Housing		Rental units constructed:
	Housing			Housing		Production		50 Household Housing Unit
2	Preservation - Owner	2015	2019	Affordable		Housing Preservation	CDBG:	Rental units rehabilitated:
				Housing			\$524,800	50 Household Housing Unit
3	Preservation - Rental	2015	2019	Affordable		Rental Housing	CDBG: \$0	Rental units rehabilitated:
				Housing		Production		50 Household Housing Unit
						Housing Preservation		
4	First Time	2015	2019	Affordable		First Time Homebuyer	CDBG: \$0	Direct Financial Assistance
	Homebuyer			Housing				to Homebuyers:
								20 Households Assisted
5	Reduction of Housing	2015	2019	Fair housing		Fair Housing		Public service activities for
	Discrimination							Low/Moderate Income
								Housing Benefit:
								100 Households Assisted
6	Homelessness	2015	2019	Homeless		Homelessness		Public service activities for
	Prevention							Low/Moderate Income
								Housing Benefit:
								50 Households Assisted
7	Service Enriched	2015	2019	Affordable		Supportive Housing		Rental units constructed:
	Housing			Housing				20 Household Housing Unit

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
8	Improved Health	2015	2019	Non-Homeless		Community	CDBG:	Public service activities
	Care Access			Special Needs		Development - Health	\$500,000	other than Low/Moderate
						Care Access		Income Housing Benefit:
								10000 Persons Assisted
9	Improve	2015	2019	Youth Services		Community		Public service activities
	Opportunities for					Development - Youth		other than Low/Moderate
	Youth					Opportunities		Income Housing Benefit:
								100 Persons Assisted
10	Improve	2015	2019	Senior Services		Community	CDBG:	Public service activities
	Opportunities for					Development - Seniors	\$130,000	other than Low/Moderate
	Seniors							Income Housing Benefit:
								500 Persons Assisted
11	Address Emerging	2015	2019	Public Services		Community	CDBG:	Public service activities
	Community Needs					Development -	\$59,922	other than Low/Moderate
						Emerging Community		Income Housing Benefit:
						Needs		500 Persons Assisted
12	Improve Public	2015	2019	Non-Homeless		Community	CDBG:	Public service activities
	Service Support			Special Needs		Development -	\$265,000	other than Low/Moderate
						Infrastructure		Income Housing Benefit:
						Improvement		500 Persons Assisted
13	Promote Economic	2015	2019	Non-Housing		Community	CDBG: \$0	Businesses assisted:
	Development			Community		Development -		5 Businesses Assisted
	Opportunities			Development		Economic		
						Development		

Table 16 – Goals Summary

Goal Descriptions

2 Go De 2 Go De 3 Go Go	ioal Name ioal escription ioal Name ioal escription ioal Name ioal escription	Affordable Rental Housing Encourage the inclusion of affordable rental housing by the private sector in new housing developments. Preservation - Owner Provide Minor Home Repair assistance to low and moderate income homeowners in order to maintain and preserve their housing. Preservation - Rental Identify existing rental properties that might benefit from rehabilitation. Enter into regulatory agreements with owners to
2 Go Go De 3 Go Go	escription oal Name oal escription oal Name oal escription	Preservation - Owner Provide Minor Home Repair assistance to low and moderate income homeowners in order to maintain and preserve their housing. Preservation - Rental Identify existing rental properties that might benefit from rehabilitation. Enter into regulatory agreements with owners to
2 Go Go De 3 Go Go	oal Name oal escription oal Name oal escription	Provide Minor Home Repair assistance to low and moderate income homeowners in order to maintain and preserve their housing. Preservation - Rental Identify existing rental properties that might benefit from rehabilitation. Enter into regulatory agreements with owners to
Go De 3 Go Go	ioal escription ioal Name ioal escription	Provide Minor Home Repair assistance to low and moderate income homeowners in order to maintain and preserve their housing. Preservation - Rental Identify existing rental properties that might benefit from rehabilitation. Enter into regulatory agreements with owners to
De 3 Go Go	escription oal Name oal escription	housing. Preservation - Rental Identify existing rental properties that might benefit from rehabilitation. Enter into regulatory agreements with owners to
3 Go Go	oal Name oal escription	Preservation - Rental Identify existing rental properties that might benefit from rehabilitation. Enter into regulatory agreements with owners to
Go	oal escription	Identify existing rental properties that might benefit from rehabilitation. Enter into regulatory agreements with owners to
	escription	
De	-	
		ensure long-term affordability (using CDBG and City Housing Funds).
4 Go	ioal Name	First Time Homebuyer
Go	ioal	Assist moderate and middle income, first-time homebuyers through provision of City-assisted down payment assistance and
De	escription	second mortgage loans.
5 Go	ioal Name	Reduction of Housing Discrimination
Go	ioal	Continue to support programs to reduce housing discrimination by investigating complaints, counseling tenants and
De	escription	landlords, and educating the owners and managers of rental housing in Pleasanton through fair housing and complaint
		investigation services
6 Go	ioal Name	Homelessness Prevention
Go	ioal	Pursue continued funding and renewal of subsidized rental assistance programs such as Supportive Housing Program (SHP),
De	escription	Shelter Plus Care (S+C), Project Independence and Section 8.
7 Go	ioal Name	Service Enriched Housing
Go	ioal	Promote the production of affordable housing both transitional and permanent with supportive services by supporting the
De	escription	acquisition and rehabilitation and new construction of units by non-profit developers.
8 Go	ioal Name	Improved Health Care Access
Go	ioal	Increase the availability and access to basic and specialty care including dental and optometry care, behavioral and mental
De	escription	health care services particularly for low income, uninsured and under-insured residents.

9	Goal Name	Improve Opportunities for Youth
	Goal	Support the provision of adequate child care and supervised youth activities
	Description	
10	Goal Name	Improve Opportunities for Seniors
	Goal	Improve access to senior programs for homebound seniors
	Description	
11	Goal Name	Address Emerging Community Needs
	Goal	Foster and encourage innovative programs that meet emerging community needs with emphasis on low income and
	Description	underserved populations; continue implementation and refinement of the Housing and Humans Services Grant (HHSG)
		program as a resource for fostering innovative programs and services.
12	Goal Name	Improve Public Service Support
	Goal	Provide HHSG funds to approximately 10 to 15 local non-profit agencies each year in the following areas: child care services;
	Description	services for persons with developmental disabilities; shelter, counseling, and related services for domestic violence victims;
		pediatric medical services; services for victims of HIV/AIDS; services to Pleasanton school-age at-risk youth; meal delivery
		service to homebound elderly persons; Alzheimers counseling and referral services and senior day care; bereavement
		counseling for low income seniors.
13	Goal Name	Promote Economic Development Opportunities
	Goal	Continue to support the Downtown Design Assistance loan program using City funds; assist businesses based on demand; if
	Description	increased need is perceived, consider expanding the program and adjusting according to level and types of need.

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

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

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

No new programs are being considered for the five-year period to reduce lead-based paint hazards inasmuch as the City's housing stock is generally young (post-1978) and in good condition. 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.

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

Actions to address lead poisoning and lead-based paint hazards are addressed routinely through ongoing application of the Uniform Building Code and by specific policies and procedures within the City's Housing Rehabilitation Program (HRP). The agency that administers the HRP is lead-certified and includes lead inspection for any properties where lead poisoning is a potential hazard.

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

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

Low income families have difficulty securing housing without income supports and/or housing assistance. Many times they also do not have additional income to pay for other needs such as food, child care, health care and dependable transportation. Living from paycheck to paycheck causes families to be in constant danger of becoming or returning to homelessness. According to the 2010 Census, 13.2% (3,243) of Pleasanton's households were low income; 8.7% (2,147) were very low income (50% or below median household income) and 5.7% (1,396) were extremely low income (at or below 30% of median household income). The 2000 Alameda County median family income was \$67,600. In 2015, it is \$92,900. This is a 37% increase in 15 years. Many lower income families are not keeping pace when incomes rise.

The most commonly available anti-poverty strategies are implemented at the county level and are addressed in the County's section of the Consolidated Plan. The Section 8 certificate and voucher program for Pleasanton residents is currently coordinated through the Housing Authority of the County of Alameda (HACA). The City will consider supporting requests by residents of local senior apartment complexes to receive additional rent subsidies for seniors as opportunities arise. [HACA recently approved a formal award of 50 Project-based Section 8 Vouchers for the first phase of the Kottinger Gardens senior housing development.]

Several years ago, the City established an Economic Vitality Committee to promote economic development in Pleasanton. At the time, a new staff position of Economic Vitality Manager was created. This individual helps to coordinate the efforts of the Committee, which works closely with the Pleasanton Chamber of Commerce and the Pleasanton Convention and Visitors Bureau to promote increased economic development and community job retention. Due to a strong local economy in recent years, Pleasanton has had significant success in attracting new retail commercial, office, and industrial development to the City. Existing business and retail complexes have drawn significant new commercial development and have created new employment opportunities for residents and non-residents.

The City of Pleasanton's Housing Commission, with support from the City Council and Planning Commission, has aggressively pursued new affordable housing both for rental and ownership during the past several years through its Inclusionary Zoning Ordinance. Although inclusionary policies have been hindered by recent statewide legislation, the City has continued to negotiate affordability agreements that have resulted in the approval of over 300 new below-market rent units (many at the very low income level) that are expected to be built out over the next several years as part of over 2,000 new apartments in Pleasanton.

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

A strength of the housing and community development delivery systems is the coordination of efforts between the jurisdictions and groups overseeing these efforts on an inter-jurisdictional basis, particularly at the broader county level. These groups, including the HOME Consortium Technical Advisory Committee (TAC), the Alameda County Housing and Community Development Advisory Committee and EveryOne Home, allow the jurisdictions to ensure that projects compliment rather than duplicate efforts, and that policies and programs have some consistency throughout the HOME Consortium. Non-housing community development programs within the Consortium have focused coordination on community development including infrastructure improvements, economic development, accessibility improvements or child care.

Locally, the Tri-Valley Housing Scholarship Program provides assistance on a small scale to promote selfsufficiency for persons who are in job training on the path to attaining living wage employment and stability. Additional county-level programs are addressed in detail in the County's section of the Consolidated Plan.

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 in connection with many City of Pleasanton 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.

SP-80 Monitoring - 91.230

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

The City of Pleasanton will monitor progress on activities undertaken with HUD funds as part of its ongoing performance monitoring procedures. This includes: bi-monthly meetings of the HOME Consortium Technical Advisory Committee where project progress is updated; monthly meetings of the City of Pleasanton Housing and Human Services Commissions, which provide citizen input on housing and public service policy and implementation in the City; and a semi-annual review of the progress of each subrecipient of federal (and local) funds, including the annual CAPER review. The City is committed to ensuring that the funds it administers are used for the intended beneficiaries as specified by local, state and federal regulations.

Pleasanton has adopted and put into operation procedures to monitor the operations of its programs. These procedures include: Public and City Council monitoring through public hearings and periodic reports to City Council; regular progress review meetings; staff evaluation; annual evaluation of priorities; submission of progress reports; periodic site visits and program evaluations; financial monitoring, record keeping, and reporting requirements; review of periodic project reports and invoicing and payment requests from outside agencies; and notification of non-compliance.

As noted earlier, all subrecipients of Pleasanton HHSG funds utilize a web-based system for applying, reporting, and invoicing. This relatively new tool has enhanced the City's ability to effectively and proactively monitor its grant recipients. In addition, staff from the cities of Pleasanton and Livermore conduct many monitoring visits jointly in cases where funding is provided to the same subrecipient for the same activity. This collaboration not only provides a significant benefit to the subrecipient (by requiring one instead of two separate monitoring visits), but enhances staff efficiency and effectiveness inasmuch as staff persons are able to support one another to ensure that the monitoring is comprehensive and thorough.

As a member of the Alameda County HOME Consortium, the City of Pleasanton will comply with statutory requirements required by the Community Development Block Grant Program, the HOME Program, and other federal funding programs (as applicable). These include but are not limited to: the National Environmental Policy Act, Fair Housing and Equal Opportunity, Affirmative Marketing, Accessibility, Section 3 of the Housing and Urban Development Act of 1968, Minority/Women's Business Enterprise outreach, labor requirements, contracting and procurement practices, the Lead-Based Paint Poisoning Prevention Act, and the Uniform Relocation Act. The City maintains standards and procedures to ensure long-term compliance with these requirements.

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Expected Resources

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

Introduction

Anticipated Resources

Program	Source of	Uses of Funds	Exped	ted Amoun	t Available Yea	ar 1	Expected	Narrative Description
	Funds		Annual	Program	Prior Year	Total:	Amount	
			Allocation:	Income:	Resources:	\$	Available	
			Ş	Ş	Ş		Reminder of ConPlan	
							\$	
CDBG	public -	Acquisition	268,922	30,000	0	298,922	1,180,000	Program income is an estimate based on
	federal	Admin and						projected repayment of past CDBG-
		Planning						funded loans issued through the City's
		Economic						Housing Rehabilitation Program.
		Development						
		Housing						
		Public						
		Improvements						
		Public Services						

Table 17 - 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 HHSG funding application review process.
- Support the purchase and rehabilitation and new construction of units by nonprofit housing developers.
- Promote private sector rehabilitation through the City's Housing Rehabilitation Program (HRP).
- Continue participation in programs to support affordable homeownership.
- Continue to provide support to nonprofit, community-based housing developers and service providers in obtaining other sources of financing.
- Promote joint development with other governmental or 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.

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

The City will utilize publically owned land (approximately 5 acres) for the Kottinger Gardens project which involves the redevelopment of two aging senior housing facilities (240 / 251 Kottinger Drive) with a total of 90 existing units. The new project, when complete, will have a total of 185 units.

Discussion

N/A

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	Affordable Rental	2015	2019	Affordable		Rental Housing		Rental units constructed: 20
	Housing			Housing		Production		Household Housing Unit
2	Preservation -	2015	2019	Affordable		Housing Preservation	CDBG:	Homeowner Housing
	Owner			Housing			\$74,800	Rehabilitated: 10 Household
								Housing Unit
3	Preservation -	2015	2019	Affordable		Housing Preservation		Rental units rehabilitated: 10
	Rental			Housing				Household Housing Unit
4	First Time	2015	2019	Affordable		First Time Homebuyer	CDBG: \$0	Direct Financial Assistance to
	Homebuyer			Housing				Homebuyers: 5 Households
								Assisted
5	Reduction of	2015	2019	Fair housing		Fair Housing	CDBG: \$0	Public service activities for
	Housing							Low/Moderate Income Housing
	Discrimination							Benefit: 20 Households Assisted
6	Homelessness	2015	2019	Homeless		Homelessness	CDBG: \$0	Homelessness Prevention: 20
	Prevention							Persons Assisted
7	Service Enriched	2015	2019	Affordable		Supportive Housing	CDBG: \$0	Public Facility or Infrastructure
	Housing			Housing				Activities for Low/Moderate
								Income Housing Benefit: 10
								Households Assisted

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
8	Improved Health	2015	2019	Non-Homeless		Community	CDBG:	Public service activities other
	Care Access			Special Needs		Development - Health	\$100,000	than Low/Moderate Income
						Care Access		Housing Benefit: 2000 Persons
								Assisted
9	Improve	2015	2019	Youth Services		Community	CDBG: \$0	Public service activities other
	Opportunities for					Development - Youth		than Low/Moderate Income
	Youth					Opportunities		Housing Benefit: 50 Persons
								Assisted
10	Improve	2015	2019	Senior Services		Community	CDBG:	Public service activities other
	Opportunities for					Development -	\$27,000	than Low/Moderate Income
	Seniors					Seniors		Housing Benefit: 100 Persons
								Assisted
11	Address Emerging	2015	2019	Public Services		Community	CDBG: \$0	Public service activities other
	Community Needs					Development -		than Low/Moderate Income
						Emerging Community		Housing Benefit: 50 Persons
						Needs		Assisted
12	Improve Public	2015	2019	Non-Homeless		Community	CDBG:	Public service activities other
	Service Support			Special Needs		Development -	\$13,338	than Low/Moderate Income
						Infrastructure		Housing Benefit: 20 Persons
						Improvement		Assisted
13	Promote Economic	2015	2019	Non-Housing		Community	CDBG: \$0	Businesses assisted: 1 Businesses
	Development			Community		Development -		Assisted
	Opportunities			Development		Economic		
						Development		

Table 18 – Goals Summary

Goal Descriptions

1	Goal Name	Affordable Rental Housing
	Goal	Support the efforts of private developers seeking to develop affordable rental housing in Pleasanton (City financial
	Description	assistance and fee waivers; tax credits secured by project developers); approve 20 new units with rents affordable to low
		and very low income households.
2	Goal Name	Preservation - Owner
	Goal	Provide Housing Rehabilitation Program (HRP) services to 10 low and very low income households.
	Description	
3	Goal Name	Preservation - Rental
	Goal	Identify existing rental properties that might benefit from rehabilitation. When possible, enter into regulatory agreements
	Description	with owners to ensure long-term affordability (using CDBG and City Housing Funds).
4	Goal Name	First Time Homebuyer
	Goal	Continue to offer down payment assistance loans through the Down Payment Assistance program to help bridge the gap
	Description	between a minimum down payment and first mortgage and increase buying capacity.
5	Goal Name	Reduction of Housing Discrimination
	Goal	Contract annually with ECHO Housing or a similar agency for fair housing and complaint investigations services throughout
	Description	the City. This service is funded through a combination of City Housing Funds and CDBG funding and includes information
		and outreach to owners, renters, and buyers concerning their rights and obligations and the support services available in
		the community.
6	Goal Name	Homelessness Prevention
	Goal	Continue to work with EveryOne Home, Abode Services, ECHO Housing, the City of Livermore, and other parties involved in
	Description	the coordination and delivery of homelessness services to reduce the incidence of homelessness in Pleasanton and the Tri-
		Valley area.
7	Goal Name	Service Enriched Housing
	Goal	Work with Alameda County and other partners to create new transitional and permanent housing units county-wide for
	Description	special needs individuals and families who are extremely low and low income households.

8	Goal Name	Improved Health Care Access		
	Goal	Continue to provide technical and material support to Axis Community Health with an emphasis on assisting the		
	Description	construction of the new clinic located at 5925 West Las Positas Blvd. in Pleasanton (and its satellite facilities).		
9	Goal Name	Improve Opportunities for Youth		
	Goal	Continue to implement the recommendations in the City's adopted Youth Master Plan.		
	Description			
10	Goal Name	Improve Opportunities for Seniors		
	Goal	Work with the City of Pleasanton Paratransit Program and agencies that deliver services to seniors (e.g., Spectrum, Open		
	Description	Heart Kitchen, Senior Support Program, etc.) to improve outreach and access.		
11	Goal Name	Address Emerging Community Needs		
	Goal	Strive to approve one new program or service for low income and/or underserved populations during the fiscal year.		
	Description			
12	Goal Name	Improve Public Service Support		
	Goal	Provide services in the following areas: child care services; services for persons with developmental disabilities; shelter,		
	Description	counseling, and related services for domestic violence victims; pediatric medical services; services for victims of HIV/AIDS;		
		services to Pleasanton school-age at-risk youth; meal delivery service to homebound elderly persons; Alzheimers counseling		
		and referral services and senior day care; bereavement counseling for low income seniors.		
13	Goal Name	Promote Economic Development Opportunities		
	Goal	Assist one to two businesses during the fiscal year according to demand.		
	Description			

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 FY2015/2016.

This section describes individual activities to be funded with FY2015/2016 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. This section also includes a description of how Pleasanton will ensure geographic distribution of its resources, the process by which assistance will be distributed in the case that an activity location is currently unknown (e.g., the City's Housing Rehabilitation Program), activities benefiting homeless and other special needs populations, and other local or state programs being used to further the jurisdiction's housing and community development goals.

No.	Agency Name	Project Title	Cap/Reh	Pub Svc	Admin
15000	City of	Administration of CDBG / HHSG			\$ 53,784
13000	Pleasanton	Program			Ş 33,704
15004A	Axis Community	Construction of New Clinic to Serve Low-	\$ 100,000		
13004A	Health	Income Residents	\$ 100,000		
15005	Neighborhood	Housing Rehabilitation Program for City	\$ 104,800		
13003	Solutions	of Pleasanton (*)	\$ 104,800		
	Spectrum				
15006	Community	Meals On Wheels for Homebound Elders		\$ 7,000	
	Services				
15011A	Open Heart	Senior Meal Program at Ridge View		\$ 10,000	
120114	Kitchen	Commons		\$ 10,000	
15011B	Open Heart	Pleasanton Hot Meal and Weekend Box		¢ 10.000	
120110	Kitchen	Lunch Program		\$ 13,338	
15011C	Open Heart	Pleasanton Senior Center Congregate		\$ 10,000	
130110	Kitchen	Meal Program		\$ 10,000	
(*) Includes \$74,800 CDBG and \$30,000 estimated Program Income		\$ 204,800	\$ 40,338	\$ 53,784	

Table 19 – Project Information

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

AP-38 Project Summary

Project Summary Information

¹ Project Name	City of Pleasanton
Target Area	Citywide
Goals Supported	Affordable Rental Housing
	Preservation - Owner
	Preservation - Rental
	First Time Homebuyer
	Reduction of Housing Discrimination
	Homelessness Prevention
	Service Enriched Housing
	Improved Health Care Access
	Improve Opportunities for Youth
	Improve Opportunities for Seniors
	Address Emerging Community Needs
	Improve Public Service Support
	Promote Economic Development Opportunities

	Needs Addressed	Rental Housing Production
		Housing Preservation
		First Time Homebuyer
		Fair Housing
		Homelessness
		Supportive Housing
		Community Development - Health Care Access
		Community Development - Youth Opportunities
		Community Development - Seniors
		Community Development - Emerging Community Needs
		Community Development - Economic Development
	Funding	CDBG: \$53,784
	Description	Administration of CDBG program by City of Pleasanton staff.
	Target Date	6/30/2016
	Estimate the number and type of families that will	Not applicable.
	benefit from the proposed activities	
	Location Description	200 Old Bernal Avenue, Pleasanton, CA 94566-0802
		123 Main Street, Pleasanton, CA 94566-0802
	Planned Activities	Administration of CDBG program by City of Pleasanton staff.
2	Project Name	Axis Community Health - Construction of New Clinic
	Target Area	Citywide
	Goals Supported	Improved Health Care Access
	Needs Addressed	Community Development - Health Care Access
	Funding	CDBG: \$100,000
	Description	Construction of new community health clinic at 5925 West Las Positas Blvd.

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	Target Date	6/30/2016
	Estimate the number and type of families that will benefit from the proposed activities	An estimated 2,400 unduplicated individuals will receive medical services during the fiscal year.
	Location Description	5925 West Las Positas Boulevard, Pleasanton, CA 94588
	Planned Activities	Construction of the clinic improvements began 3/30/2015 and will continue through the end of 2015.
3	Project Name	Neighborhood Solutions - Housing Rehabilitation Program
	Target Area	Citywide
	Goals Supported	Preservation - Owner Preservation - Rental
	Needs Addressed	Housing Preservation
	Funding	CDBG: \$104,800
	Description	Provision of grants and loans to low-income Pleasanton home owners and rental housing tenants through the City's Housing Rehabilitation Program.
	Target Date	6/30/2016
	Estimate the number and type of families that will benefit from the proposed activities	10 Pleasanton home owners and/or renters will receive housing rehabilitation services during the fiscal year.
	Location Description	Properties will be located thoughout Pleasanton based on demand and need.
	Planned Activities	
4	Project Name	Spectrum Community Services - Meals on Wheels Program
	Target Area	Citywide
	Goals Supported	Improved Health Care Access Improve Opportunities for Seniors Improve Public Service Support

Needs Addressed	Community Development - Seniors
Funding	CDBG: \$7,000
Description	Provision of home-delivered meals to homebound seniors in Pleasanton.
Target Date	6/30/2016
Estimate the number and type of families that will benefit from the proposed activities	20 unduplicated seniors will received home delivered meals during the fiscal year.
Location Description	Not applicable (services will be provided throughout the City to any client who meets eligibility requirements).
Planned Activities	
Project Name	Open Heart Kitchen - Ridge View Commons Senior Meal Program
Target Area	Citywide
Goals Supported	Improve Opportunities for Seniors Address Emerging Community Needs Improve Public Service Support
Needs Addressed	Community Development - Seniors
Funding	CDBG: \$13,338
Description	Provision of a hot meal program on weekday evenings to Pleasanton seniors. Meals are served at Ridge View Commons senior apartments.
Target Date	6/30/2016
Estimate the number and type of families that will benefit from the proposed activities	I 100 unduplicated senior will receive hot, nutritious meals at an affordable cost during the fiscal year.
Location Description	Ridge View Commons, 5200 Case Avenue, Pleasanton, CA 94566
Planned Activities	

6	Project Name	Open Heart Kitchen - Hot Meal and Weekend Box Lunch Program
	Target Area	Citywide
	Goals Supported	Address Emerging Community Needs Improve Public Service Support
	Needs Addressed	Community Development - Emerging Community Needs
	Funding	CDBG: \$10,000
	Description	Provision of hot meals at Trinity Lutheran Church in Pleasanton with distribution of box lunches for weekend nutrition.
	Target Date	6/30/2016
	Estimate the number and type of families that will benefit from the proposed activities	Approximately 50 unduplicated residents will benefit from the hot meal and weekend box lunch program.
	Location Description	Trinity Lutheran Church, 1225 Hopyard Road, Pleasanton, CA 94566
	Planned Activities	
7	Project Name	Open Heart Kitchen - Pleasanton Senior Center Congregate Meal Program
	Target Area	Citywide
	Goals Supported	Improve Opportunities for Seniors Address Emerging Community Needs Improve Public Service Support
	Needs Addressed	Community Development - Seniors Community Development - Emerging Community Needs
	Funding	CDBG: \$10,000
	Description	Provision of hot weekday lunches to seniors in a congregate setting at the Pleasanton Senior Center.
	Target Date	6/30/2016

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Estimate the number and type of families that will	Approximately 50 unduplicated seniors will benefit from the congregate lunch
benefit from the proposed activities	program at the Pleasanton Senior Center during the fiscal year.
Location Description	Pleasanton Senior Center, 5353 Sunol Boulevard, Pleasanton, CA 94566
Planned Activities	

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	
N/A	N/A	

Table 20 - Geographic Distribution

Rationale for the priorities for allocating investments geographically

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

The City of Pleasanton contracts with Neighborhood Solutions to administer a Housing Rehabilitation Program (HRP) using primarily CDBG funds for eligible low-income home owners and renters in Pleasanton. The goal of the program is to conserve, preserve, and improve the housing and neighborhoods by addressing the needs of low income Pleasanton residents. To that end, the program provides grants or low interest loans to qualifying properties and owners to provide a variety of rehabilitation services, such as rental housing rehabilitation, minor and major home repairs, mobile home repairs, exterior paint or clean-up assistance, seismic retrofitting, and accessibility improvements. Based on past experience, units benefitting from the HRP have been spread throughout the community although mobile home grants are by definition focused in the two largest mobile home parks at 3231 and 3263 Vineyard Avenue in east Pleasanton (census tract 4507.42). These two parks are primarily occupied by low-income seniors.

The rental rehabilitation program is available to those properties in Pleasanton where at least 51% of the units are occupied by low and very low income households, or in which 51% of the units will be rent-

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restricted through a rental agreement to qualified low income households after rehabilitation. This program provides below-market-interest-rate loans to property owners to complete the rehabilitation. Tenant incomes are verified to determine whether at least half of the units are occupied by lower income households. The property's operating budget is also examined to determine the property's long-term financial feasibility and ability to repay the loan.

HOME Investment Partnership funding is allocated to the jurisdictions within the Alameda County HOME Consortium on a formula basis. HOME funds are distributed throughout all parts of the HOME Consortium. All activities to be undertaken are intended and open to serve eligible households living in the Consortium.

Discussion

N/A

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

Introduction

Low income families have difficulty securing housing without income supports and/or housing assistance. Many times they also do not have additional income to pay for other needs such as food, child care, health care and dependable transportation. Living from paycheck to paycheck causes families to be in constant danger of becoming or returning to homelessness. According to the 2010 Census, 13.2% (3,243) of Pleasanton's households were low income; 8.7% (2,147) were very low income (50% or below median household income) and 5.7% (1,396) were extremely low income (at or below 30% of median household income). The 2000 Alameda County median family income was \$67,600. In 2015, it is \$92,900. This is a 37% increase in 15 years. Many lower income families are not keeping pace when incomes rise.

The most commonly available anti-poverty strategies are implemented at the county level and are addressed in the County's section of the Consolidated Plan. The Section 8 certificate and voucher program for Pleasanton residents is currently coordinated through the Housing Authority of the County of Alameda (HACA). The City will consider supporting requests by residents of local senior apartment complexes to receive additional rent subsidies for seniors as opportunities arise. [HACA recently approved a formal award of 50 Project-based Section 8 Vouchers for the first phase of the Kottinger Gardens senior housing development.]

Actions planned to address obstacles to meeting underserved needs

There is significant focus on the provision of affordable housing, supportive social services, and community development programs in Pleasanton among all levels of the public and private sectors. 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. These groups, including the Urban County Technical Advisory Committees, the Alameda County Housing and Community Development Advisory Committee and EveryOne Home, allow the different jurisdictions to ensure that projects compliment rather than duplicate efforts, and that policies and programs have some consistency throughout the Urban County. An additional strength is the growing level of coordination between service providers, particularly those addressing housing needs of the homeless and special needs populations, and affordable housing in collaborations. Non-housing community development programs within the Urban County have involved coordination between the Urban County jurisdictions and the agencies or organizations focused on the particular community development area, which might be infrastructure improvements, economic development, accessibility improvements or child care.

Actions planned to foster and maintain affordable housing

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 through the implementation in 2010 of its new Housing and Human Services Grant (HHSG) program which also uses a web-based grant management system (ZoomGrants). 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, and may participate in more focused subregional efforts in the near future.

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 leadcontaminated 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 inasmuch as the City's housing stock is generally young (post-1978) and in good condition. 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 tenantbased rental assistance for HOME units built before 1978 as required as part of 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 (HRP).

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 (TAC) which is comprised of staff from the member jurisdictions and the County. The 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 in connection with many City of Pleasanton 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.

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

See above.

Discussion

N/A

Program Specific Requirements

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

Introduction

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

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

 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 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 	268,922
plan.	1,250,000
3. The amount of surplus funds from urban renewal settlements	0
4. The amount of any grant funds returned to the line of credit for which the planned use	
has not been included in a prior statement or plan	0
5. The amount of income from float-funded activities	0
Total Program Income:	1,518,922

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%

Discussion

N/A