

CDBG

COMMUNITY DEVELOPMENT BLOCK GRANT



FISCAL YEAR 2022-23 ANNUAL ACTION PLAN DRAFT

PUBLIC COMMENT PERIOD
April 2, 2022 – May 2, 2022

ADMINISTERED BY: PLANNING AND DEVELOPMENT SERVICES

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Executive Summary

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

Introduction

The City of Palo Alto (City) Fiscal Year (FY) 2022-23 One Year Action Plan contains the City's one-year plan to carry out housing and community development activities funded by Federal formula grant funds received from the U.S. Department of Housing and Urban Development (HUD), Community Development Block Grant (CDBG) program. This Action Plan covers the third of five program years covered by the City's 2020-2025 Consolidated Plan which was adopted by the Palo Alto City Council on June 15, 2020.

The Department of Planning and Development Services is the lead agency for the Consolidated Plan and submits the Annual Action Plan for the City's CDBG program.

HUD requires entitlement jurisdictions to submit an annual Action Plan to report the distribution of federal entitlement grant funds over the Consolidated Plan's five-year period identifying how funding allocations help meet the goals covered in the Consolidated Plan.

Since the draft of this Annual Action Plan for FY2022-2023, the CDBG federal appropriations for FY2022-2023 have not yet been determined by HUD. For budgeting purposes, staff estimated the City's HUD Entitlement Grant for FY2022-2023 based on a 10% reduction from the FY2021-2022 entitlement grant. The estimated total amount available for allocation in FY2022-2023 is \$665,459, which includes the entitlement grant, program income, and previous year's resources. A total of \$665,459 is available for funding projects and programs during the 2022 Program Year.

The City's Action Plan covers the time period from July 1, 2022, to June 30, 2023, (HUD Program Year 2022). The City's FY 2022-23 Action Plan reports on the status of needs and outcomes the City expects to achieve in the coming year. All of the activities mentioned in this Action Plan are based on current priorities. By addressing these priorities, the City hopes to meet those objectives stated in the 2020-2025 Consolidated Plan. All the proposed projects and activities are intended to principally benefit residents of the City who have extremely low-, low- and moderate-income, and populations that have special needs, such as the elderly, disabled, and homeless.

Summary of the objectives and outcomes identified in the Plan

The City is part of the San Francisco Metropolitan Bay Area, located 35 miles south of San Francisco and 14 miles north of San José. The City is located within the County of Santa Clara, borders San Mateo County, and encompasses an area of approximately 26 square miles, one-third of which consists of open space¹.

¹ U.S. Census Bureau:
<https://www.census.gov/quickfacts/fact/table/paloaltocity>

According to Quick facts data provided by the U.S. Census Bureau¹, the City's total resident population is 68,572, per the Census on April 1, 2020. The City has the most educated residents in the country and is one of the most expensive cities to live in. In Silicon Valley, the City is considered a central economic focal point and is home to over 9,483 businesses.

The Action Plan provides a summary of how the City will utilize its CDBG allocation to meet the needs of the City's lower income population. According to the U.S. census data, 6.1% of all residents within the City had incomes below the federal poverty level.

Additionally, according to the 2019 Point in Time Homeless Census², there are 299 unsheltered homeless individuals living within the City of Palo Alto. This number represents an increase of 17% from the 256 individuals that were counted in 2017.

As mentioned previously, an estimated total of \$665,459 is available for funding projects and programs during FY2022-23. In FY 2021-22 the City received \$528,961 from the federal CDBG program, approximately \$136,049 in program income and \$73,910 in reallocated funds from previous years. Table 1, "Fiscal Year 2022 CDBG Budget" below summarizes the uses of the funds proposed during FY 2022-23.

Table 1: Fiscal Year 2022 CDBG Budget

Applicant Agency	Allocation
Public Services	
Alta Housing - SRO Resident Supportive Services	\$20,113
Catholic Charities of Santa Clara County – Long Term Care Ombudsman	\$10,000
LifeMoves – Case Management at Opportunity Center	\$23,613
Silicon Valley Independent Living Center – Case Management Services	\$14,021
Project Sentinel – Fair Housing Services	\$23,615
<i>Sub-total</i>	\$91,362
Planning and Administration	
City of Palo Alto Administration	\$121,816
<i>Sub-total</i>	\$121,816
Economic Development	
Downtown Streets – Workforce Development Program	\$160,477
<i>Sub-total</i>	\$160,477

² South County Homeless Census and Survey Comprehensive Report:
<https://www.sccgov.org/sites/osh/ContinuumofCare/ReportsandPublications/Documents/2015%20Santa%20Clara%20County%20Homeless%20Census%20and%20Survey/2019%20SCC%20Homeless%20Census%20and%20Survey%20Report.pdf>

Public Facilities and Improvement	
525 East Charleston Project	\$218,669
<i>Sub-total</i>	\$218,669
Housing Rehabilitation	
Rebuilding Together Peninsula	\$73,135
<i>Sub-total</i>	\$73,135
Grand Total	\$665,459

Evaluation of past performance

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

The City is responsible for ensuring compliance with all rules and regulations associated with the CDBG entitlement grant program. The City’s Annual Action Plans and Consolidated Annual Performance and Evaluation Reports (CAPER) have provided many details about the goals, projects and programs completed by the City. A review of past CAPERs reveals a strong record of performance in the use of CDBG funds. For example, during the 2015-2020 Consolidated Plan period, 244 affordable rental units were rehabilitated, 130 jobs were created or retained, and nearly 2,600 households were assisted through public service activities for low- and moderate-income housing.

The City evaluates the performance of subrecipients on a semiannual basis. Subrecipients are required to submit semiannual progress reports, which include client data, performance objectives, as well as data on outcome measures. Prior to the start of the program year, program objectives are developed collaboratively by the subrecipient and the City, ensuring that they are aligned with the City's overall goals and strategies. The City utilizes the semiannual reports to review progress towards annual goals.

Summary of citizen participation process and consultation process

The City solicited input throughout the development of the FY 2022-23 Annual Action Plan. As required by HUD, the City provides multiple opportunities for public review and comment on the Action Plan and on any substantial amendments to it. Per the City’s adopted Citizen Participation Plan, the City held a 30-day public review comment period for the Action Plan. The City published notifications of upcoming public hearings and the 30-day public review comment period in a local newspaper of general circulation, on the City’s CDBG webpage and via email blasts to stake holders. The City held two advertised public hearings on March 10, 2022, and May 2, 2022. The Action Plan 30-day public review period occurred from April 2, 2022, through May 2, 2022.

Summary of public comments *[To be updated after close of comment period]*

There were no public comments received during the public review period.

Summary of comments or views not accepted and the reasons for not accepting them *[To be updated after close of comment period]*

There were no public comments received during the public review period. The City accepts and responds to all comments that are submitted. As mentioned above, no public comments were received regarding the FY2022-23 Action Plan.

Summary

Please see above.

The Process

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

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.

Table 2: Responsible Agencies

Agency Role	Name	Department/Agency
CDBG Administrator	Palo Alto	City of Palo Alto: Department of Planning and Development Services

Narrative

The City is the Lead and Responsible Agency for the United States Department of Housing and Urban Development's (HUD) entitlement programs in Palo Alto. The Department of Planning and Development Services is responsible for administering the City's CDBG program. The City joined the HOME Consortium in 2015 and receives federal HOME Investment Partnership (HOME) funds through the County.

Entitlement jurisdictions receive entitlement funding (i.e., non-competitive, formula funds) from HUD. HUD requires the City to submit a five-year Consolidated Plan and Annual Action Plan to HUD listing priorities and strategies for the use of its federal funds.

The Consolidated Plan helps local jurisdictions to assess their affordable housing and community development needs and market conditions to meet the housing and community development needs of its populations. As a part of the Consolidated Plan process for 2020-2025, the City collaborated with the County of Santa Clara (County) as the Urban County representing the cities of Campbell, Los Altos, Los Altos Hills, Los Gatos, Monte Sereno, Morgan Hill, and Saratoga; the cities of Cupertino, Gilroy, Mountain View, Sunnyvale, San José, and Santa Clara; and the Santa Clara County Housing Authority (SCCHA) to identify and prioritize housing and community development needs across the region, and to develop strategies to meet those needs. The FY 2022-23 Annual Action Plan represents the third year of CDBG funding of the 2020-2025 Consolidated Plan.

Consolidated Plan Public Contact Information

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AP-10 Consultation - 91.100, 91.110, 91.200(b), 91.300(b), 91.215(I) and 91.315(I)

Introduction

The Action Plan is a one-year plan which describes the eligible programs, projects, and activities to be undertaken with funds expected during FY 2022-23 and their relationship to the priority housing, homeless and community development needs outlined in the 2020-25 Consolidated Plan.

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)).

During Fiscal Year 2022-23, the City will continue to work with non-profit organizations to provide programs and services for low-income households; private industry, including financial and housing development groups, to encourage the development of affordable housing opportunities regionally and within the City; and other local jurisdictions, including the County of Santa Clara, in carrying out and monitoring regional projects in a coordinated and cost-effective manner. The City will provide technical assistance to the public service agencies it funds with CDBG dollars and will continue to attend the biweekly Regional CDBG/Housing Coordinators meetings.

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 Santa Clara County Office of Supportive Housing is the administrator of the regional Continuum of Care (CoC). The City continuously coordinates with the Santa Clara County CoC to end and prevent homelessness in the County. The Santa Clara County CoC is a group comprising of stakeholders throughout the County, including governmental agencies, homeless service and shelter providers, homeless population, housing advocates, affordable housing developers, and various private parties, including businesses and foundations.

The City's representation on the CoC Board is its Human Services Manager. Members of the CoC meet monthly to plan CoC programs, identify gaps in homeless services, establish funding priorities, and pursue a systematic approach to addressing homelessness.

The CoC is governed by the CoC Board, which takes a systems-change approach to preventing and ending homelessness. This same CoC Board is comprised of the same individuals who serve on the Destination: Home (Destination Home) Leadership Board. Destination Home is a public-private partnership that is committed to collective impact strategies to end chronic homelessness. Destination Home is the governing body for the CoC and is responsible for implementing by-laws and operational protocols of the CoC.

Regional efforts of the CoC include the development of The Community Plan to End Homelessness, which identifies strategies to address the needs of people experiencing homelessness in the County, including chronically homeless individuals and families, families with children, veterans, and unaccompanied youth. The plan also addresses the needs of persons at risk of homelessness. The new community plan to end homelessness can be viewed at <https://destinationhomesv.org/community-plan>.

Also, during the development of the 2020-25 Consolidated Plan, the City consulted both the CoC and County Office of Supportive Housing for their expertise and experience for identifying community needs.

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

The City is not an ESG entitlement jurisdiction and therefore does not receive ESG funds. However, the City does administer federal grant programs that help homeless and low-income families in Santa Clara County. The City also helps fund and conduct the Point in Time (PIT) count, the biennial regional collaborative effort to count and survey people experiencing homelessness. The latest count and survey were conducted on February 24, 2022. The data from the 2022 County of Santa Clara PIT count is used to plan, fund, and implement actions for reducing chronic homelessness and circumstances that bring about homelessness.

The Santa Clara County Office of Supportive Services takes the role of Homeless Management Information System (HMIS) administration. The County, and its consultant Bitfocus, work jointly to operate and oversee HMIS. Both software and HMIS system administration are now provided by Bitfocus. Funding for HMIS in Santa Clara County comes from HUD, the County of Santa Clara, and the City of San Jose. The County's HMIS is used by many City service providers across the region to record information and report outcomes.

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

Table 3: Agencies, Groups, Organizations Who Participated

1	Agency/Group/Organization	Boys and Girls Clubs of Silicon Valley
	Agency/Group/Organization Type	Services-Children
	What section of the Plan was addressed by Consultation?	Needs Assessment and Strategic Plan

	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Agency attended Santa Clara focus group meeting on 11/7/19 as part of the 2020-25 Consolidated Plan process.
2	Agency/Group/Organization	Healthier Kids Foundation Santa Clara County
	Agency/Group/Organization Type	Services-Children
	What section of the Plan was addressed by Consultation?	Needs Assessment and Strategic Plan
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Agency attended Santa Clara focus group meeting on 11/7/19 as part of the 2020-25 Consolidated Plan process
3	Agency/Group/Organization	Community Services Agency
	Agency/Group/Organization Type	Services-Elderly Persons
	What section of the Plan was addressed by Consultation?	Needs Assessment and Strategic Plan
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Agency attended stakeholder consultation conference call on 11/15/19 as part of the 2020-25 Consolidated Plan process
4	Agency/Group/Organization	San Jose Conservation Corps Charter
	Agency/Group/Organization Type	Services-Education
	What section of the Plan was addressed by Consultation?	Needs Assessment and Strategic Plan
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Agency attended Gilroy focus group meeting on 11/18/19 as part of the 2020-25 Consolidated Plan process

5	Agency/Group/Organization	CommUniverCity San Jose
	Agency/Group/Organization Type	Services-Education
	What section of the Plan was addressed by Consultation?	Needs assessment and Strategic Plan
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Agency attended stakeholder consultation conference call on 11/25/19 and regional forum meeting in San Jose on 11/20/19 as part of the 2020-25 Consolidated Plan process.
6	Agency/Group/Organization	The Health Trust
	Agency/Group/Organization Type	Services-Persons with Disabilities Services-Persons with HIV/AIDS Services-Health
	What section of the Plan was addressed by Consultation?	Needs Assessment and Strategic Plan
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Agency attended stakeholder consultation on 11/21/19 as part of the 2020-25 Consolidated Plan process
7	Agency/Group/Organization	Rebuilding Together, Silicon Valley
	Agency/Group/Organization Type	Housing
	What section of the Plan was addressed by Consultation?	Strategic plan and needs assessment
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Agency attended stakeholder consultation conference call on 11/21/19 and San Jose regional forum on 11/20/19 as part of the 2020-25 Consolidated Plan process
8	Agency/Group/Organization	City of Cupertino
	Agency/Group/Organization Type	Other government - Local
	What section of the Plan was addressed by Consultation?	Needs assessment and strategic plan
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Agency was contacted for consultation as a partner in addressing the needs of the County as part of the 2020-25 Consolidated Plan process

9	Agency/Group/Organization	City of Gilroy
	Agency/Group/Organization Type	Other government - Local
	What section of the Plan was addressed by Consultation?	Needs assessment and strategic plan
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Agency was consulted and provided emailed feedback as part of the 2020-25 Consolidated Plan process
10	Agency/Group/Organization	City of Mountain View
	Agency/Group/Organization Type	Other government - Local
	What section of the Plan was addressed by Consultation?	Needs assessment and strategic plan
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Agency attended regional forum meeting at Palo Alto on 11/7/19 as part of the 2020-25 Consolidated Plan process
11	Agency/Group/Organization	Bill Wilson Center
	Agency/Group/Organization Type	Services-Children
	What section of the Plan was addressed by Consultation?	Needs Assessment and Strategic Plan
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Agency attended Santa Clara focus group meeting on 11/7/19, community meetings on 11/4/19 at Morgan Hill and 11/20/19 at Roosevelt as part of the 2020-25 Consolidated Plan process
12	Agency/Group/Organization	Heart of the Valley
	Agency/Group/Organization Type	Services-Elderly Persons
	What section of the Plan was addressed by Consultation?	Needs Assessment and Strategic Plan
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Agency was consulted through interview questions. Agency provided emailed feedback as part of the 2020-25 Consolidated Plan process

13	Agency/Group/Organization	City of San Jose
	Agency/Group/Organization Type	Other government - Local
	What section of the Plan was addressed by Consultation?	Needs assessment and strategic plan
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Agency was contacted for consultation as a partner in addressing the needs of the County as part of the 2020-25 Consolidated Plan process
14	Agency/Group/Organization	City of Morgan Hill
	Agency/Group/Organization Type	Other government - Local
	What section of the Plan was addressed by Consultation?	Needs assessment and strategic plan
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Agency attended regional forum meeting at Morgan Hill on 11/4/19 as part of the 2020-25 Consolidated Plan process
15	Agency/Group/Organization	City of Sunnyvale
	Agency/Group/Organization Type	Other government - Local
	What section of the Plan was addressed by Consultation?	Needs assessment and strategic plan
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Agency attended regional forum meeting at Palo Alto on 11/7/19 and provided emailed feedback as part of the 2020-25 Consolidated Plan process
16	Agency/Group/Organization	Servant Partners
	Agency/Group/Organization Type	Neighborhood Organization Neighborhood Organization
	What section of the Plan was addressed by Consultation?	Needs Assessment and Strategic Plan
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Attended community meeting on 11/13/19 at Hillview library as part of the 2020-25 Consolidated Plan process

17	Agency/Group/Organization	Senior Adults Legal Assistance (SALA)
	Agency/Group/Organization Type	Service-Fair Housing Legal
	What section of the Plan was addressed by Consultation?	Needs assessment and strategic plan
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Agency attended Palo Alto and San Jose public engagement meeting on 11/17/19 and 11/19/19, regional forum meeting on 11/4/19 at Morgan Hill and 11/7/19 at Palo Alto as part of the 2020-25 Consolidated Plan process
18	Agency/Group/Organization	HomeFirst
	Agency/Group/Organization Type	Services-homeless
	What section of the Plan was addressed by Consultation?	Needs assessment and Strategic Plan
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Agency attended regional forum meeting at Morgan Hill on 11/4/19 as part of the 2020-25 Consolidated Plan process
19	Agency/Group/Organization	Santa Clara County Office of Supportive Housing
	Agency/Group/Organization Type	Other government - County Continuum of Care
	What section of the Plan was addressed by Consultation?	Needs assessment and Strategic Plan
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Agency attended regional forum meeting at Morgan Hill on 11/4/19 and at Palo Alto on 11/7/19 as part of the 2020-25 Consolidated Plan process
20	Agency/Group/Organization	City of Santa Clara
	Agency/Group/Organization Type	Other government - Local
	What section of the Plan was addressed by Consultation?	Needs assessment and Strategic Plan

	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Agency attended regional forum meeting at Morgan Hill on 11/4/19 and provided emailed feedback as part of the 2020-25 Consolidated Plan process
21	Agency/Group/Organization	Vista Center for the Blind and Visually Impaired
	Agency/Group/Organization Type	Services-Persons with Disabilities
	What section of the Plan was addressed by Consultation?	Needs assessment and Strategic Plan
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Agency attended stakeholder consultation on 12/9/19 as part of the 2020-25 Consolidated Plan process
22	Agency/Group/Organization	Destination: Home
	Agency/Group/Organization Type	Services-homeless
	What section of the Plan was addressed by Consultation?	Needs assessment and Strategic Plan
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Agency attended stakeholder consultation on 11/11/19 as part of the 2020-25 Consolidated Plan process
23	Agency/Group/Organization	Community Solutions
	Agency/Group/Organization Type	Services-Victims of Domestic Violence
	What section of the Plan was addressed by Consultation?	Needs assessment and Strategic Plan
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Agency attended the AFH and ConPlan joint meeting on 12/11/19 at the Gilroy Council Chambers as part of the 2020-25 Consolidated Plan process
24	Agency/Group/Organization	St Mary Parish
	Agency/Group/Organization Type	Neighborhood Organization Neighborhood Organization
	What section of the Plan was addressed by Consultation?	Needs assessment and Strategic Plan

	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Agency attended the AFH and ConPlan joint meeting on 12/11/19 at the Gilroy Council Chambers as part of the 2020-25 Consolidated Plan process
25	Agency/Group/Organization	Community and Neighborhood Revitalization Committee - Gilroy
	Agency/Group/Organization Type	Community Organization
	What section of the Plan was addressed by Consultation?	Needs assessment and Strategic Plan
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Agency co-hosted the AFH and ConPlan joint meeting on 12/11/18 at the Gilroy Council Chambers as part of the 2020-25 Consolidated Plan process

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

Table 4: Other Local / Regional / Federal Planning Efforts

Name of Plan	Lead Organization	How do the goals of your Strategic Plan overlap with the goals of each plan?
Continuum of Care	Regional Continuum of Care Council	Identifies housing inventory count to facilitate the provision of housing services to those experiencing homelessness.
City of Palo Alto Housing Element (2015-2023)	City of Palo Alto	Identifies barriers to affordable housing, such as land-use controls, inefficiencies of the development review process, and strategies to alleviate such barriers.
2012-2014 Comprehensive HIV Prevention and Care Plan	Santa Clara County HIV Planning Council for Prevention and Care	This plan provides a roadmap for the Santa Clara County HIV Planning Council for Prevention and Care to provide a comprehensive and compassionate system of HIV prevention and care services for the County. This effort aligns with the Strategic Plan's goal to support activities that strengthen neighborhoods through the provision of community services and public improvements.

Name of Plan	Lead Organization	How do the goals of your Strategic Plan overlap with the goals of each plan?
SCCHA Moving to Work Annual Plan	Santa Clara County Housing Authority	Addresses housing authority updates and strategies pertaining to public housing and vouchers.
Regional Housing Need Plan for San Francisco Bay Area	Association of Bay Area Governments	This plan analyzes the total regional housing need for the County and all of the Bay Area. This effort aligns with the Strategic Plan's goal to assist in the creation and preservation of affordable housing.
Community Plan to End Homelessness in Santa Clara	Destination: Home	The Community Plan to End Homelessness in the County is a five-year plan to guide governmental actors, nonprofits, and other community members as they make decisions about funding, programs, priorities and needs. This effort aligns with the Strategic Plan's goal to support activities to end homelessness
Palo Alto's Infrastructure: Catching Up, Keeping Up, and Moving Ahead	City of Palo Alto Infrastructure Blue Ribbon Plan	This plan details recommendations for infrastructure maintenance and replace, as well as identifies potential sources of funding. This effort aligns with the Strategic Plan's goal to support activities that strengthen neighborhoods through the provision of community services and public improvements
City of Palo Alto Comprehensive Plan (2030)	City of Palo Alto	This plan is the primary tool for guiding future development in Palo Alto. It provides a guide for long-term choices and goals for the City future. This effort aligns with the Strategic Plan's goal to support activities that strengthen neighborhoods through the provision of community services and public improvements

Narrative

Please see above.

AP-12 Citizen Participation - 91.105, 91.115, 91.200(c) and 91.300(c)

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

The Planning and Development Services Department is the lead agency for overseeing the development of the Consolidated Plan and Action Plan. Per the City’s adopted Citizen Participation Plan, the City is to allow a 30-day public review and comment period for the Action Plan. The City has published notifications of upcoming public hearings and the 30-day public review comment period in the local newspaper of general circulation, on its CDBG webpage and via email blasts. The City held two advertised public hearings on March 10, 2022, and May 2, 2022. The Action Plan 30-day public review period occurred from April 2, 2022, through May 2, 2022. The City has not received any public comments to-date.

Citizen Participation Outreach

Table 5: Citizen Participation Outreach

Mode of Outreach	Target of Outreach	Summary of response	Summary of comments received	Summary of comments not accepted/reason
Public Hearing	Nontargeted/ broad community	The Human Relations Commission met on March 10, 2021 to discuss the FY2022-23 funding allocations and review the draft FY2022-23 Annual Action Plan	One member of the public provided comments on the funding allocation. Three members representing two funding applicants provided comments at the meeting.	All comments were accepted.
Public Hearing	Nontargeted/ broad community	The City Council met on May 2, 2022 to discuss the FY2022-23 funding allocations and adopt the draft FY2022-23 AAP	Update After Meeting	Update After Meeting

Mode of Outreach	Target of Outreach	Summary of response	Summary of comments received	Summary of comments not accepted/reason
Newspaper Ad	Nontargeted/ broad community	Notice of Human Relations Commission Public Hearing and Public Comment Period on the Draft FY2022-23 AAP and FY2022-23 CDBG Funding Allocations was published in the Daily Post on February 24, 2022.	Update if comments received	
Newspaper Ad	Nontargeted/ broad community	Notice of Public Hearing and Public Comment Period on the Draft AAP was published in the Daily Post on April 2, 2022.	Update if comments received	
Website	Nontargeted/ broad community	Draft AAP FY2022-23 posted at: https://www.cityofpaloalto.org/CDBG	Update if comments received	

Email Blast	Nontargeted/ broad community	Notice of Public Hearing and Public Comment Period on the Draft AAP was emailed to approximately () stakeholders	Update if comments received	
Email Blast	Nontargeted/ broad community	Notice of City Council Public Hearing was emailed to approximately ()stakeholders	Update if comments received	

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Expected Resources

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

Introduction

In FY2022-23, the City will allocate \$665,459 to eligible activities that address the needs identified in the Consolidated Plan. It should be noted that while the HUD CDBG allocations are critical, the allocations are not sufficient to overcome barriers and address all needs that low- income individuals and families face in attaining self-sufficiency. The City will continue to leverage additional resources as described below to provide support and services to the populations in need within the community. The following section discusses the anticipated resources available for community development activities during the next remaining three years of the City’s 5-Year Consolidated Plan, .

Anticipated Resources

Table 6: Expected Resources FY2022-23 – Priority Table

Source of Funds	Uses of Funds	Expected Amount Available Year 2				Narrative Description
		Program: CDBG				
		Annual \$	Program Income: \$	Prior Year: \$	Total: \$	
Public - Federal	Admin and Planning Economic Development Housing Public Improvement Public Services	483,080	126,000	56,379	665,459	CDBG funds will be used for the creation and preservation of affordable rental units, improvements in lower income neighborhoods, and public services that benefit low income and special needs households

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

Entitlement Funds

Leverage, in the context of the CDBG and HOME Investment Partnerships Program (HOME), means bringing other local, state, and federal financial resources to maximize the reach and impact of the City's HUD Programs. HUD, like many other federal agencies, encourages the recipients of federal monies to demonstrate that efforts are being made to strategically leverage additional funds in order to achieve greater results.

The City joined the Santa Clara County's HOME Consortium in 2015 and does not receive federal HOME funds on an entitlement basis from HUD. The HOME Consortia consists of the cities of Cupertino, Gilroy, Palo Alto, and the Urban County. HOME funds can be used to fund eligible affordable housing projects for acquisition, construction, and rehabilitation. Starting in FY 2015-16 developers of affordable housing projects were eligible to competitively apply through an annual RFP process directly to the County for HOME funds to help subsidize affordable housing projects in Palo Alto. Applications will be directly submitted through the County's request for proposal process for available HOME funds. Certain nonprofit organizations known as Community Housing Development Organizations (CHDOs) may also apply for funding from State HCD for housing projects located within Palo Alto. The City received one HOME grant from 1992 HOME funding for the Barker Hotel project. Proceeds from HOME loan repayments must be deposited into a HOME Program Income Fund and used in accordance with the HOME program regulations.

In addition, the County will only fund a project that has the local support of the City. If the City receives HOME dollars from its participation in the HOME consortium, the required 25% matching funds will be provided from the City's Affordable Housing Fund, which is comprised of two sub-funds: The Commercial Housing Fund and the Residential Housing Fund. To date, no projects within the City have been funded through the HOME Consortium. Moving forward, the City plans to increase outreach to developers in the City to provide additional information on the HOME Consortium and available funding.

Other State and Federal Grant Programs

In addition to the CDBG entitlement dollars, the federal government has several other funding programs for community development and affordable housing activities. These include Section 8 Housing Choice Voucher Program, Section 202, Section 811, the Federal Home Loan Bank Affordable Housing Program (AHP), and others. It should be noted that in most cases the City would not be the applicant for these funding sources as many of these programs offer assistance to affordable housing developers rather than local jurisdictions.

The State of California has recently passed approximately 20 bills with the intent of increasing or preserving affordable housing with the State. According to the Governor's State of the State

address, bills that help increase housing production, both market-rate and affordable, will be a priority in 2020. The City will continue to track and look for opportunities to leverage State resources for the City.

Local Housing and Community Development Sources

Other local resources that support housing and community development programs include:

- Palo Alto Commercial Housing Fund, which is for the development of below market rate (BMR) housing units and paid by mitigation fees on commercial and industrial projects; and
- Palo Alto Residential Housing Fund, which is for the development of below market rate (BMR) housing units and paid by miscellaneous funding sources.

The City will continue to seek opportunities for projects that meet local bond requirements in order to bring additional resources to help the City's affordable housing shortage.

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

The City has no surplus public land. However, in 2019, the Governor Newsome signed Executive Order N-06-19 that ordered the California Department of General Services (DGS) and the California Department of Housing and Community Development (HCD) to identify and prioritize excess state-owned property and aggressively pursue sustainable, innovative, cost-effective housing projects. There is no excess state property in the City of Palo Alto.

Discussion

Please see information provided in previous sections.

Annual Goals and Objectives

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

Goals Summary Information – FY2022-23

Table 7: Goals Summary

Goal Name	Start	End	Category	Area	Needs Addressed	Fund	Goal Outcome Indicator
Affordable Housing	2020	2025	Affordable Housing	Citywide	Affordable Housing	CDBG: \$73,135	Homeowner Housing Rehabilitated: 6 Household Housing Units
Homelessness	2020	2025	Homeless	Citywide	Homelessness	CDBG: \$67,747	Public service activities other than Low/Moderate Income Housing Benefit: 169 Persons Assisted
Strengthen Neighborhoods	2020	2025	Non-Homeless Special Needs Non-Housing Community Development	Citywide	Community Services and Public Improvements	CDBG: \$218,669	Public service activities other than Low/Moderate Income Housing Benefit: 2077 Persons Assisted
Fair Housing	2020	2025	Non-Housing Community Development	Citywide	Fair Housing	CDBG: \$23,615	Public service activities other than Low/Moderate Income Housing Benefit: 15 Persons Assisted
Economic Development	2020	2025	Non-Housing Community Development	Citywide	Economic Development	CDBG: \$160,477	Jobs created/retained: 14 Jobs

Goal Descriptions

1	Goal Name	Affordable Housing
	Goal Description	Assist in the creation and preservation of affordable housing for low income and special needs households.
2	Goal Name	Homelessness
	Goal Description	Support activities to prevent and end homelessness, such as funding affordable housing opportunities, resource centers for homeless individuals, and support for tenants of single-room occupancy units.
3	Goal Name	Strengthen Neighborhoods
	Goal Description	Provide community services and public improvements to benefit low-income and special needs households. This includes assisting those with disabilities to transition from unstable housing to permanent housing, supporting residents of long-term care facilities, and supporting individuals experiencing domestic violence.
4	Goal Name	Fair Housing
	Goal Description	Promote fair housing choice by funding fair housing organizations to provide fair housing services, such as education, tenant-landlord mediation, and testing.
5	Goal Name	Economic Development
	Goal Description	Support economic development activities that promote employment growth and help lower-income people secure and maintain jobs. This includes funding nonprofits working toward developing the skills of low-income and homeless individuals.

AP-35 Projects - 91.420, 91.220(d)

Introduction

The Consolidated Plan goals below represent high priority needs for the City of Palo Alto (City) and serve as the basis for the strategic actions the City will use to meet these needs. The goals, listed in no particular order, are:

1. Assist in the creation and preservation of affordable housing for low income and special needs households.
2. Support activities to end homelessness.
3. Support activities that strengthen neighborhoods through the provision of community services and public improvements to benefit low income and special needs households.
4. Promote fair housing choice.
5. Expand economic opportunities for low-income households.

Table 8: Project Information

No.	Project Name
1.	Catholic Charities of Santa Clara County - Long Term Care Ombudsman
2.	LifeMoves - Opportunity Services Center and Hotel De Zink (HDZ): Case Management
3.	Alta Housing - Single Room Occupancy (SRO) Support Services
4.	Silicon Valley Independent Living Center- Housing and Emergency Services for Persons with Disabilities
5.	Project Sentinel - Fair Housing Services
6.	City of Palo Alto - Planning and Administration
7.	Downtown Streets Inc. - Workforce Development Program.
8.	Rebuilding Together Peninsula – Safe at Home
9.	525 E. Charleston – 50 Unit Development of Affordable Housing

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

The City awards CDBG funding to projects and programs that will primarily benefit low-income, homeless, and special needs households. The City operates on a two-year grant funding cycle for CDBG public service grants and a one-year cycle for CDBG capital housing rehabilitation and public facilities and improvement projects. Projects are only considered for funding within the Consolidated Plan period if they address the goals discussed above.

AP-38 Project Summary

Project Summary Information

1	Project Name	Catholic Charities of Santa Clara County: Long Term Care Ombudsman
	Target Area	Citywide
	Goals Supported	Strengthen Neighborhoods
	Needs Addressed	Community Services and Public Improvements
	Funding	CDBG: \$10,000
	Description	Long-Term Care Ombudsman Program. Eligible Activity (Matrix Code):05A. CDBG National Objective: 570.208(a)(2). CDBG Citation:570.201(e). Recipient Type: LMC
	Target Date	6/30/2023
	Estimate the number and type of families that will benefit from the proposed activities	The program will provide advocacy and complaint investigation for 50 elderly residents of long-term care facilities in Palo Alto.
	Location Description	Long-term care and skilled nursing facilities throughout the City.
	Planned Activities	Regular contact with Palo Alto Residential Care Facilities to observe and monitor conditions of care.
2	Project Name	LifeMoves - Opportunity Services Center and Hotel De Zink (HDZ): Case Management
	Target Area	Citywide
	Goals Supported	Homelessness
	Needs Addressed	Homelessness
	Funding	CDBG: \$23,613
	Description	Opportunity Services Center Eligible Activity (Matrix Code):03TCDBG National Objective: 570.208(a)(2). CDBG Citation:570.201(e). Recipient Type: LMC
	Target Date	6/30/2023

	Estimate the number and type of families that will benefit from the proposed activities	30 unduplicated individuals (homeless and/or very low-income individuals per year) will receive case management services including assistance with housing/job searches, referrals and mentoring at the Opportunity Services Center and Hotel De Zink.
	Location Description	33 Encina Way, Palo Alto, CA 94301
	Planned Activities	Case management services will be provided to Opportunity Services Center and Hotel De Zink clients in locating housing and/or employment and be connected to benefits.
3	Project Name	Alta Housing
	Target Area	Residents of Barker Hotel (25 units) and Alma Place (106 units)
	Goals Supported	Homelessness
	Needs Addressed	Homelessness
	Funding	CDBG: \$20,113
	Description	SRO Resident Support Program. Eligible Activity (Matrix Code):05OCDBG National Objective:570.208(a)(2). CDBG Citation:570.201(e). Recipient Type: LMC
	Target Date	6/30/2023
	Estimate the number and type of families that will benefit from the proposed activities	Case management and support counseling services will be provided to residents of Barker Hotel and Alma Place
	Location Description	439 Emerson Street, Palo Alto, CA 94301 735 Alma Street Palo Alto, CA 94301
	Planned Activities	Alta Housing engages a service coordinator to provide 40 hours weekly services to provide case management and support counseling services to residents at Alma Place and Barker Hotel to help them maintain housing stability. Activities include financial counseling, health maintenance, information and referral, problem solving, employment assistance, crisis intervention and case management. Both Alma Place and Barker Hotel are single-room occupancy facilities.
4	Project Name	Silicon Valley Independent Living Center: Housing and Emergency Housing Services.
	Target Area	Citywide

	Goals Supported	Strengthen Neighborhoods
	Needs Addressed	Community Services and Public Improvements
	Funding	CDBG: \$14,021
	Description	Housing and Emergency Housing Services. Eligible Activity (Matrix Code):05B. CDBG National Objective:570.208(a)(2). CDBG Citation:570.201(e). Recipient Type: LMC
	Target Date	6/30/2023
	Estimate the number and type of families that will benefit from the proposed activities	27 unduplicated Palo Alto residents will benefit from one-on-one housing assistance.
	Location Description	Citywide
	Planned Activities	Silicon Valley Independent Living Center provides assistance for individuals with disabilities and their families to transition from homelessness, health care facilities, unstable or temporary housing to permanent affordable, accessible, integrated housing with emergency assistance, security deposits, rent, information, and referral, and other basic essentials.
5	Project Name	Project Sentinel - Fair Housing Services
	Target Area	Citywide
	Goals Supported	Fair Housing
	Needs Addressed	Fair Housing
	Funding	CDBG: \$23,615
	Description	Fair Housing Services. Eligible Activity (Matrix Code):21D. CDBG NationalObjective:570.208(a)(2). CDBG Citation: 570.206(c). Recipient Type: LMC
	Target Date	6/30/2023

	Estimate the number and type of families that will benefit from the proposed activities	15 unduplicated individuals will be provided with fair housing services of complaint counseling, investigation, and where appropriate enforcement referral.
	Location Description	Citywide
	Planned Activities	Project Sentinel will provide community education and outreach regarding fair housing law and practices, investigation, counseling, and legal referral for victims of housing discrimination, and analyses for City staff and officials regarding fair housing practices. California and federal fair housing laws assure specific protected classes the right to be treated in terms of their individual merits and qualifications in seeking housing. Unfortunately, some people are not aware of the law or their rights.
6	Project Name	City of Palo Alto - Planning and Administration
	Target Area	Citywide
	Goals Supported	Affordable Housing Homelessness Strengthen Neighborhoods Fair Housing Economic Development
	Needs Addressed	Affordable Housing Homelessness Community Services and Public Improvements Fair Housing Economic Development
	Funding	CDBG: \$121,816
	Description	Planning and Administration: CDBG Citation: 570.206(a)
	Target Date	6/30/2023
	Estimate the number and type of families that will benefit from the proposed activities	The City will provide general administrative support to the CDBG program.
	Location Description	Citywide

	Planned Activities	Administer the Administrative costs for the overall management, coordination, and evaluation of the CDBG program, and the project delivery costs associated with bringing projects to completion.
7	Project Name	Downtown Streets Inc. - Workforce Development Program.
	Target Area	Citywide
	Goals Supported	Economic Development
	Needs Addressed	Economic Development
	Funding	CDBG: \$160,477
	Description	Workforce Development Program. Eligible Activity (Matrix Code): 05H.CDBG National Objective: 570.208(a)(2)(A). CDBG Citation: 570.204(a)(2). Recipient Type: LMC
	Target Date	6/30/2023
	Estimate the number and type of families that will benefit from the proposed activities	14 unduplicated homeless and unemployed persons will be placed in jobs through job training/employment readiness classes and outreach to local employers.
	Location Description	Citywide
	Planned Activities	The Workforce Development Program will provide a transition from unemployment and homelessness to regular employment and housing through case management, job training, mentoring, housing, and transportation assistance. Downtown Streets Team will screen and prepare applicants and will use their community connections to provide training and job opportunities.
8	Project Name	Rebuilding Together Peninsula – Safe at Home
	Target Area	Citywide
	Goals Supported	Affordable Housing
	Needs Addressed	Affordable Housing
	Funding	CDBG: \$73,135
	Description	Preserves affordable housing by transforming homes through critical repairs and accessibility modifications, at no cost to the service recipient. The majority of the low-income homeowners served will be

	elderly seniors and/or people with disabilities, who are physically and financially unable to maintain safe living conditions for themselves and their families
Target Date	6/30/2023
Estimate the number and type of families that will benefit from the proposed activities	4 households
Location Description	Citywide
Planned Activities	Provide home safety repairs, mobility, and accessibility improvements for low-income households in Palo Alto with the primary consideration being the correction of safety hazards.
9	
Project Name	525 E. Charleston Road
Target Area	
Goals Supported	Affordable Housing
Needs Addressed	Affordable Housing
Funding	CDBG: \$218,669
Description	Eden Housing is developing 50 units of affordable housing. Approximately half the units are for persons with disabilities. The parcel is owned by the County and will be a long-term lease with the developer. The City intends to use CDBG funding for predevelopment costs as per HUD regulations.
Target Date	6/30/2023
Estimate the number and type of families that will benefit from the proposed activities	50 Low-Income Households
Location Description	525 E. Charleston Road
Planned Activities	Provide affordable housing for persons with disabilities.

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 allocates CDBG funds to benefit low-moderate income (LMI) households and does not have target areas. Instead, the City focuses its services and capital improvements across the City as a whole.

Geographic Distribution

Table 9: Geographic Distribution

Target Area	Percentage of Funds
Citywide	100%

Rationale for the priorities for allocating investments geographically

Not applicable.

Discussion

Please see discussion above.

DRAFT

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

Introduction

The incorporated and unincorporated jurisdictions within the County face barriers to affordable housing that are common throughout the Bay Area. High on the list of market barriers is the lack of developable land, which increases the cost of available lands and increases housing development costs. Local opposition is another common obstacle as many neighbors have strong reactions to infill and affordable housing developments. Their opposition is often based on misconceptions, such as a perceived increase in crime; erosion of property values; increase in parking and traffic congestion; and overwhelmed schools. However, to ensure a healthy economy the region must focus on strategies and investment that provide housing for much of the region's workforce – for example, sales clerks, secretaries, waiters, baristas, teachers, and health service workers – whose incomes significantly limit their housing choices.

It should be noted that in a constrained housing supply market, when housing developments produce housing that is relatively affordable, higher income buyers and renters generally outbid lower income households. A home's final sale or rental price will typically exceed the projected sales or rental costs. Public subsidies are often needed to guarantee affordable homes for low- and moderate-income households.

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

Palo Alto is addressing the barriers to affordable housing through:

- **Density Bonus Ordinance:** The City recently updated its Density Bonus ordinance which lowered the eligibility requirements to qualify for a higher density bonus percentage up to 80% as well as providing more exceptions to applicable zoning and development standards. One significant update is if a 100% affordable development is located within a half a mile of a major transit stop, the City cannot impose any density limits and entitled to a maximum height increase of three additional stories or 33 feet.
- **Below Market Rate (BMR) Housing Program:** Established in 1974, the City's BMR requires developers to provide a certain percentage of units as BMR in every approved project of three units or more. The program originally required that for developments on sites of less than five acres, the developer must provide 15 percent of the total housing units as BMR housing units. If the site was larger than five acres, the developer was required to provide 20 percent of the units as BMR housing. The City of Palo Alto have historically used in-lieu fees and the use of development impact fees charged on new, market-rate housing and/or commercial development to finance 100% affordable developments. The City updated its Commercial and Residential Impact Fee Nexus Studies

and adopted two ordinances to make changes to its BMR program and adopted a new fee structure. The ordinances became effective on June 19, 2017.

- **Fair Housing:** The City provides funding to Project Sentinel. Project Sentinel provides expertise in fair housing law and tenant-landlord disputes. Services include information, referrals, community outreach and education. In addition, Project Sentinel resolve fair housing complaints via investigation, mediation, education and outreach to both property owners and tenants about fair housing policies.
- **Housing Incentive Program (HIP):** Effective May 2, 2019, this Ordinance adopted changes to the following zoning districts: Citywide – where multifamily uses are permitted, Multifamily Residential Districts (RM), Downtown (CD-C), California Avenue (CC ((2))), and El Camino Real (CS and CN).
- **Affordable Housing (AH) Combining District:** In 2018, The City Council adopted the Affordable Housing Combining District to provide flexible development standards beyond the State Density Bonus Law to allow 100% affordable housing projects located in a commercial zoned area.
- **Workforce Housing (WH) Combining District:** The City Council also adopted in 2018 the Workforce Housing Combining District to encourage the development of housing within half-mile of major fixed rail transit by modifying flexible development standards for the public facilities (PF) zoning district.

Discussion

Please see above.

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

Introduction

This section discusses the City's efforts in addressing the underserved needs, expanding, and preserving affordable housing, reducing lead-based paint hazards, and developing institutional structure for delivering housing and community development activities.

Actions planned to address obstacles to meeting underserved needs

The diminishing amount of funds continues to be the most significant obstacle to addressing the needs of underserved populations. To address this, the City supplements its CDBG funding with other resources and funds, such as:

- In FY2020-21, The City's Human Service Resource Allocation Process (HSRAP) provided \$549,306 from the General Fund in support of human services. The HSRAP funds, in conjunction with the CDBG public service funds, are distributed to local non-profit agencies. Additionally, approximately \$50,000 was provided to nonprofit organizations serving Palo Alto residents with short-term and/or urgent funding to address emergency, critical or emerging human services needs through the Emerging Needs Fund.

- The Palo Alto Commercial Housing Fund is funded with mitigation fees provided under Palo Alto's BMR housing program from developers of commercial and industrial projects and used to assist new housing development or the acquisition, rehabilitation, or the preservation of existing housing for affordable housing

- The Palo Alto Residential Housing Fund is funded with mitigation fees provided under Palo Alto's BMR housing program from residential developers and money from other miscellaneous sources, such as proceeds from the sale or lease of City property. The Residential Housing Fund is used to assist new housing development or the acquisition, rehabilitation, or the preservation of existing housing for affordable housing.

- The City's Below Market Rate Emergency Fund was authorized in 2002 to provide funding on an ongoing basis for loans to BMR owners for special assessment loans and for rehabilitation and preservation of the City's stock of BMR ownership units.

- HOME Program funds are available on an annual competitive basis through the State of California HOME program, and the County's HOME Consortium.

- The Housing Authority of the County of Santa Clara (HACSC) administers the federal Section 8 program countywide. The program provides rental subsidies and develops affordable housing for low-income households, seniors and persons with disabilities living within the County.

Actions planned to foster and maintain affordable housing

The City will foster and maintain affordable housing by continuing the following programs and ordinances:

- The Below Market Rate Emergency Fund which provides funding on an ongoing basis for loans to BMR owners for special assessment loans and for rehabilitation and preservation of the City's stock of BMR ownership units.

- The Commercial Housing Fund and Residential Housing Fund are used to assist new housing development or the acquisition, rehabilitation, or the preservation of existing housing for affordable housing.
- The Density Bonus Ordinance adopted by the City Council in January 2014. The density bonus regulations allow for bonuses of 20 to 35 percent, depending on the amount and type of affordable housing provided.
- The City's participation in the County's HOME Consortium will allow developers of affordable housing projects to be eligible to competitively apply through an annual RFP process directly to the County for HOME funds to help subsidize affordable housing projects in Palo Alto, including acquisition, construction, and rehabilitation.

Actions planned to reduce lead-based paint hazards

The City's housing and CDBG staff provides information and referral to property owners, developers, and non-profit organizations rehabilitating older housing about lead-based paint (LBP) hazards. Any house to be rehabilitated with City financial assistance is required to be inspected for the existence of LBP and LBP hazards. The City will provide financial assistance for the abatement of LBP hazards in units rehabilitated with City funding. The City also requires that contractors are trained and certified in an effort to decrease the risk of potential use of LBP in new units. All development and rehabilitation projects must be evaluated according to HUD's Lead Safe Housing Rule 24CFR Part 35.

Actions planned to reduce the number of poverty-level families

The City, in its continuing effort to reduce poverty, will prioritize funding agencies that provide direct assistance to the homeless and those in danger of becoming homeless. In FY 2022-2023, these programs will include the following:

- LifeMoves provides basic necessities for persons who are homeless or at risk of becoming homeless. The Opportunity Services Center is a comprehensive, one-stop, multi-service, day drop-in center that provides critical services for homeless Palo Alto residents. Specifically, the facility provides showers, laundry, clothing, snacks, case management, and shelter/housing referral services.
- Alta Housing will provide counseling and supportive case management services for low-income residents of single-room occupancy facilities to help them maintain housing stability. Activities include financial counseling, health maintenance, information and referral, problem solving, employment assistance, crisis intervention, and case management.
- Downtown Streets Team works to reduce homelessness through a "work first" model. Downtown Streets Team uses its community connections to provide training and job opportunities to homeless people, specifically in the downtown area.

Actions planned to develop institutional structure

The City is striving to improve intergovernmental and private sector cooperation to synergize efforts and resources and develop new revenues for community service needs and the production of affordable housing. Collaborative efforts include:

- Regular bi-weekly meetings between entitlement jurisdictions at the CDBG Coordinators Meeting and Regional Housing Working Group.
- Joint jurisdiction Request for Proposals and project review committees.
- Coordination on project management for projects funded by multiple jurisdictions.
- HOME Consortium meetings between member jurisdictions for affordable housing projects.

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

The City benefits from a strong jurisdiction and region-wide network of housing and community development partners, such as the County and the Continuum of Care. To improve intergovernmental and private sector cooperation, the City will continue to participate with other local jurisdictions and developers in sharing information and resources.

In addition to the actions listed above, the City will continue to coordinate with the City's human services funding efforts to comprehensively address community needs.

Discussion

Please see discussions above.

DRAFT

Program Specific Requirements

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

Introduction

The following provides additional information about the CDBG program income and program requirements.

Community Development Block Grant Program (CDBG)

Reference 24 CFR 91.220(I)(1)

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

1. The total amount of program income that will have been received before the start of the next program year and that has not yet been reprogrammed	126,000
2. The amount of proceeds from section 108 loan guarantees that will be used during the year to address the priority needs and specific objectives identified in the grantee's strategic plan.	0
3. The amount of surplus funds from urban renewal settlements	0
4. The amount of any grant funds returned to the line of credit for which the planned use has not been included in a prior statement or plan	0
5. The amount of income from float-funded activities	0
Total Program Income:	\$ 126,000

Other CDBG Requirements

1. The amount of urgent need activities	0
2. The estimated percentage of CDBG funds that will be used for activities that benefit persons of low and moderate income. Overall Benefit - A consecutive period of one, two or three years may be used to determine that a minimum overall benefit of 70% of CDBG funds is used to benefit persons of low and moderate income.	100 %

Discussion

Please see discussion above.

APPENDIX A

PUBLIC COMMENTS

**The Draft FY2022-23 Annual Action Plan was circulated for Public
Comments and Review from April 2, 2022, through May 2, 2022.**

**During the 30 days public comment
and review period time, no comments were received**

APPENDIX B

PUBLIC HEARING NOTIFICATIONS

APPENDIX C

CDBG APPLICATION FORMS

Application for Federal Assistance SF-424		
* 1. Type of Submission:	* 2. Type of Application:	* If Revision, select appropriate letter(s):
<input type="checkbox"/> Preapplication	<input type="checkbox"/> New	<input type="text"/>
<input checked="" type="checkbox"/> Application	<input checked="" type="checkbox"/> Continuation	* Other (Specify):
<input type="checkbox"/> Changed/Corrected Application	<input type="checkbox"/> Revision	<input type="text"/>
* 3. Date Received:	4. Applicant Identifier:	
05/13/2022	<input type="text"/>	
5a. Federal Entity Identifier:	5b. Federal Award Identifier:	
<input type="text"/>	B-22-MC-06-0020	
State Use Only:		
6. Date Received by State:	7. State Application Identifier:	
<input type="text"/>	<input type="text"/>	
8. APPLICANT INFORMATION:		
* a. Legal Name: City of Palo Alto		
* b. Employer/Taxpayer Identification Number (EIN/TIN):	* c. UEI:	
94-6000389C	050520782000	
d. Address:		
* Street1:	250 Hamilton Ave	
Street2:	<input type="text"/>	
* City:	Palo Alto	
County/Parish:	<input type="text"/>	
* State:	CA: California	
Province:	<input type="text"/>	
* Country:	USA: UNITED STATES	
* Zip / Postal Code:	94301-42531	
e. Organizational Unit:		
Department Name:	Division Name:	
Planning&Development Services	Long Range Planning	
f. Name and contact information of person to be contacted on matters involving this application:		
Prefix:	Ms.	* First Name:
Middle Name:	Clare	
* Last Name:	Campbell	
Suffix:	<input type="text"/>	
Title: <input type="text"/>		
Organizational Affiliation: <input type="text"/>		
* Telephone Number:	650-617-3191	Fax Number:
* Email:	clare.campbell@cityofpaloalto.org	

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):		
<input type="text"/>		
* 10. Name of Federal Agency:		
U.S. Department of Housing and Urban Development		
* 11. Catalog of Federal Domestic Assistance Number:		
14.218		
CFDA Title:		
<input type="text"/>		
* 12. Funding Opportunity Number:		
<input type="text"/>		
* Title:		
<input type="text"/>		
* 13. Competition Identification Number:		
<input type="text"/>		
Title:		
<input type="text"/>		
* 14. Areas Affected by Project (Cities, Counties, States, etc.):		
<input type="text"/>	<input type="button" value="Add Attachment"/>	<input type="button" value="Delete Attachment"/>
	<input type="button" value="View Attachment"/>	
* 15. Descriptive Title of Applicant's Project:		
The City of Palo Alto Community Development Block Grant (CDBG) program for Fiscal Year 2022.		
Attach supporting documents as specified in agency instructions.		
<input type="button" value="Add Attachments"/>	<input type="button" value="Delete Attachments"/>	<input type="button" value="View Attachments"/>

Application for Federal Assistance SF-424

16. Congressional Districts Of:

* a. Applicant

* b. Program/Project

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

Add Attachment

Delete Attachment

View Attachment

17. Proposed Project:

* a. Start Date:

* b. End Date:

18. Estimated Funding (\$):

* a. Federal	<input type="text" value="483,080.00"/>
* b. Applicant	<input type="text"/>
* c. State	<input type="text"/>
* d. Local	<input type="text"/>
* e. Other	<input type="text" value="56,379.00"/>
* f. Program Income	<input type="text" value="126,000.00"/>
* g. TOTAL	<input type="text" value="665,459.00"/>

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

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

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

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

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

Yes No

If "Yes", provide explanation and attach

Add Attachment

Delete Attachment

View Attachment

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

** I AGREE

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

Authorized Representative:

Prefix: * First Name:

Middle Name:

* Last Name:

Suffix:

* Title:

* Telephone Number: Fax Number:

* Email:

* Signature of Authorized Representative:

* Date Signed:

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


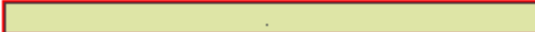
PLEASE DO NOT RETURN YOUR COMPLETED FORM TO THE OFFICE OF MANAGEMENT AND BUDGET. SEND IT TO THE ADDRESS PROVIDED BY THE SPONSORING AGENCY.

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

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

1. Has the legal authority to apply for Federal assistance, and the institutional, managerial and financial capability (including funds sufficient to pay the non-Federal share of project costs) to ensure proper planning, management and completion of project described in this application.
2. Will give the awarding agency, the Comptroller General of the United States and, if appropriate, the State, the right to examine all records, books, papers, or documents related to the assistance; and will establish a proper accounting system in accordance with generally accepted accounting standards or agency directives.
3. Will not dispose of, modify the use of, or change the terms of the real property title or other interest in the site and facilities without permission and instructions from the awarding agency. Will record the Federal awarding agency directives and will include a covenant in the title of real property acquired in whole or in part with Federal assistance funds to assure non-discrimination during the useful life of the project.
4. Will comply with the requirements of the assistance awarding agency with regard to the drafting, review and approval of construction plans and specifications.
5. Will provide and maintain competent and adequate engineering supervision at the construction site to ensure that the complete work conforms with the approved plans and specifications and will furnish progressive reports and such other information as may be required by the assistance awarding agency or State.
6. Will initiate and complete the work within the applicable time frame after receipt of approval of the awarding agency.
7. Will establish safeguards to prohibit employees from using their positions for a purpose that constitutes or presents the appearance of personal or organizational conflict of interest, or personal gain.
8. Will comply with the Intergovernmental Personnel Act of 1970 (42 U.S.C. §§4728-4763) relating to prescribed standards of merit systems for programs funded under one of the 19 statutes or regulations specified in Appendix A of OPM's Standards for a Merit System of Personnel Administration (5 C.F.R. 900, Subpart F).
9. Will comply with the Lead-Based Paint Poisoning Prevention Act (42 U.S.C. §§4801 et seq.) which prohibits the use of lead-based paint in construction or rehabilitation of residence structures.
10. Will comply with all Federal statutes relating to non-discrimination. These include but are not limited to: (a) Title VI of the Civil Rights Act of 1964 (P.L. 88-352) which prohibits discrimination on the basis of race, color or national origin; (b) Title IX of the Education Amendments of 1972, as amended (20 U.S.C. §§1681 1683, and 1685-1688), which prohibits discrimination on the basis of sex; (c) Section 504 of the Rehabilitation Act of 1973, as amended (29 U.S.C. §794), which prohibits discrimination on the basis of handicaps; (d) the Age Discrimination Act of 1975, as amended (42 U.S.C. §§6101-6107), which prohibits discrimination on the basis of age; (e) the Drug Abuse Office and Treatment Act of 1972 (P.L. 92-255), as amended relating to nondiscrimination on the basis of drug abuse; (f) the Comprehensive Alcohol Abuse and Alcoholism Prevention, Treatment and Rehabilitation Act of 1970 (P.L. 91-616), as amended, relating to nondiscrimination on the basis of alcohol abuse or alcoholism; (g) §§523 and 527 of the Public Health Service Act of 1912 (42 U.S.C. §§290 dd-3 and 290 ee 3), as amended, relating to confidentiality of alcohol and drug abuse patient records; (h) Title VIII of the Civil Rights Act of 1968 (42 U.S.C. §§3601 et seq.), as amended, relating to nondiscrimination in the sale, rental or financing of housing; (i) any other nondiscrimination provisions in the specific statute(s) under which application for Federal assistance is being made; and (j) the requirements of any other nondiscrimination statute(s) which may apply to the application.

11. Will comply, or has already complied, with the requirements of Titles II and III of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (P.L. 91-648) which provide for fair and equitable treatment of persons displaced or whose property is acquired as a result of Federal and federally-assisted programs. These requirements apply to all interests in real property acquired for project purposes regardless of Federal participation in purchases.
12. Will comply with the provisions of the Hatch Act (5 U.S.C. §§1501-1508 and 7324-7328) which limit the political activities of employees whose principal employment activities are funded in whole or in part with Federal funds.
13. Will comply, as applicable, with the provisions of the Davis-Bacon Act (40 U.S.C. §§276a to 276a-7), the Copeland Act (40 U.S.C. §276c and 18 U.S.C. §874), and the Contract Work Hours and Safety Standards Act (40 U.S.C. §§327-333) regarding labor standards for federally-assisted construction subagreements.
14. Will comply with flood insurance purchase requirements of Section 102(a) of the Flood Disaster Protection Act of 1973 (P.L. 93-234) which requires recipients in a special flood hazard area to participate in the program and to purchase flood insurance if the total cost of insurable construction and acquisition is \$10,000 or more.
15. Will comply with environmental standards which may be prescribed pursuant to the following: (a) institution of environmental quality control measures under the National Environmental Policy Act of 1969 (P.L. 91-190) and Executive Order (EO) 11514; (b) notification of violating facilities pursuant to EO 11738; (c) protection of wetlands pursuant to EO 11990; (d) evaluation of flood hazards in floodplains in accordance with EO 11988; (e) assurance of project consistency with the approved State management program developed under the Coastal Zone Management Act of 1972 (16 U.S.C. §§1451 et seq.); (f) conformity of Federal actions to State (Clean Air) implementation Plans under Section 176(c) of the Clean Air Act of 1955, as amended (42 U.S.C. §§7401 et seq.); (g) protection of underground sources of drinking water under the Safe Drinking Water Act of 1974, as amended (P.L. 93-523); and, (h) protection of endangered species under the Endangered Species Act of 1973, as amended (P.L. 93-205).
16. Will comply with the Wild and Scenic Rivers Act of 1968 (16 U.S.C. §§1271 et seq.) related to protecting components or potential components of the national wild and scenic rivers system.
17. Will assist the awarding agency in assuring compliance with Section 106 of the National Historic Preservation Act of 1966, as amended (16 U.S.C. §470), EO 11593 (identification and protection of historic properties), and the Archaeological and Historic Preservation Act of 1974 (16 U.S.C. §§469a-1 et seq).
18. Will cause to be performed the required financial and compliance audits in accordance with the Single Audit Act Amendments of 1996 and OMB Circular No. A-133, "Audits of States, Local Governments, and Non-Profit Organizations."
19. Will comply with all applicable requirements of all other Federal laws, executive orders, regulations, and policies governing this program.
20. Will comply with the requirements of Section 106(g) of the Trafficking Victims Protection Act (TVPA) of 2000, as amended (22 U.S.C. 7104) which prohibits grant award recipients or a sub-recipient from (1) Engaging in severe forms of trafficking in persons during the period of time that the award is in effect (2) Procuring a commercial sex act during the period of time that the award is in effect or (3) Using forced labor in the performance of the award or subawards under the award.

SIGNATURE OF AUTHORIZED CERTIFYING OFFICIAL 	TITLE City Manager
APPLICANT ORGANIZATION City of Palo Alto	DATE SUBMITTED 

CERTIFICATIONS

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

Affirmatively Further Fair Housing --The jurisdiction will affirmatively further fair housing.

Uniform Relocation Act and Anti-displacement and Relocation Plan -- It will comply with the acquisition and relocation requirements of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended, (42 U.S.C. 4601-4655) and implementing regulations at 49 CFR Part 24. It has in effect and is following a residential anti-displacement and relocation assistance plan required under 24 CFR Part 42 in connection with any activity assisted with funding under the Community Development Block Grant or HOME programs.

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

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

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

Consistency with plan --The housing activities to be undertaken with Community Development Block Grant, HOME, Emergency Solutions Grant, and Housing Opportunities for Persons With AIDS funds are consistent with the strategic plan in the jurisdiction's consolidated plan.

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

Signature of Authorized Official

Date

Title

Specific Community Development Block Grant 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 plan identifies community development and housing needs and specifies both short-term and long-term community development objectives that have been developed in accordance with the primary objective of the CDBG program (i.e., the development of viable urban communities, by providing decent housing and expanding economic opportunities, primarily for persons of low and moderate income) and requirements of 24 CFR Parts 91 and 570.

Following a Plan -- It is following a current consolidated plan 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 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 CDBG-assisted activities which the grantee certifies are designed to meet other community development needs having 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 (see Optional CDBG Certification).

2. Overall Benefit. The aggregate use of CDBG funds, including Section 108 guaranteed loans, during program year(s) _____ [a period specified by the grantee of one, two, or three specific consecutive program years], 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.

In addition, in the case of properties owned and occupied by moderate-income (not low-income) families, an assessment or charge may be made against the property for public improvements financed by a source other than CDBG funds if the jurisdiction certifies that it lacks CDBG funds to cover the assessment.

Excessive Force -- It has adopted and is enforcing:

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

Compliance with Anti-discrimination laws -- The grant will be conducted and administered in conformity with title VI of the Civil Rights Act of 1964 (42 U.S.C. 2000d) and the Fair Housing Act (42 U.S.C. 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 of Authorized Official

Date

Title

OPTIONAL Community Development Block Grant Certification

Submit the following certification only when one or more of the activities in the action plan are designed to meet other community development needs having particular urgency as specified in 24 CFR 570.208(c):

The grantee hereby certifies that the Annual Plan includes one or more specifically identified CDBG-assisted activities which are designed to meet other community development needs having 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 to meet such needs.

Signature of Authorized Official

Date

Title