

# 2025-2026 Draft Action Plan City of Sunnyvale

Community Development Block Grant Program  
Home Investment Partnership Program

April 2025

[Amended January 2026](#)



Sunnyvale



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## Executive Summary

### AP-05 Executive Summary - 24 CFR 91.200(c), 91.220(b)

#### 1. *Introduction*

This FY 2025/26 Action Plan serves as an application for funds under two formula grant programs administered by the U.S. Department of Housing and Urban Development (HUD). These grants provide the City of Sunnyvale (City) with an average of roughly \$1.1 million annually. For 2025, the City will receive an allocation of Community Development Block Grant (CDBG) in the amount of \$1,038,891 - and a HOME Investment Partnerships (HOME) Program grant of \$383,899 . This Action Plan covers the fiscal year beginning July 1, 2025, and ending June 30, 2026, which is the first year of the City's 2025- 2030 Consolidated Plan (ConPlan) period. The Action Plan describes the eligible activities that the City intends to undertake in FY 2025/26 to address the priority needs and implement the strategies identified in the Plan, using the City's CDBG and HOME grants. The activities described in this Action Plan are intended to primarily benefit the lower-income residents of Sunnyvale, affirmatively further fair housing choice, and meet priority needs. In addition to these grants, the City has a local Housing Mitigation Fund (HMF), which is used to support local affordable housing programs, including some that are not eligible for HUD funding. This fund is derived from fees received occasionally in varying amounts, and there is no guaranteed annual funding amount, therefore less emphasis is placed on these funds as a regular funding source in this Action Plan.

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

The City has organized its priority needs based on the structure presented in HUD regulations (24 CFR 91.215): affordable housing, alleviation of homelessness, economic development, and non-housing community development. Priority is assigned based on the level of need that is demonstrated by the data that has been collected during the preparation of the Plan, specifically in the Needs Assessment and Market Analysis; the information gathered during the consultation and citizen participation process; current City policy, federal laws and regulations related to the HUD grants, and the availability of resources to address these needs. Based on these components, housing needs are considered a high priority, as well as alleviation of homelessness, economic development, and non-housing community development needs. The City's goals and objectives are organized into four categories:

- A. Affordable Housing (including housing for special needs households)
- B. Alleviation of Homelessness

- C. Other Community Development Efforts (Public Services, Community Facilities and Infrastructure)
- D. Expanding Economic Opportunities.

Table 7 on page 19 summarizes the objectives and outcomes that will be addressed in this Action Plan.

### 3. *Evaluation of past performance*

The City is responsible for ensuring compliance with all rules and regulations associated with the CDBG and HOME entitlement grant programs. The City's Annual Action Plans and CAPERs, posted on the City's website, provide details about the goals, projects and programs completed by the City. The City recognizes that the evaluation of past performance is critical to ensure the City and its sub-recipients are implementing activities effectively and that those activities align with the City's overall strategies and goals. The City evaluates the performance of subrecipients on a quarterly basis. Sub-recipients are required to submit quarterly progress reports, which include client data, performance objectives, as well as data on outcome measures. Before the start of the program year, program objectives are developed collaboratively by the sub-recipient and the City, ensuring that they are aligned with the City's overall goals and strategies. The City utilizes the quarterly reports to review progress toward annual goals. During the past year, the City successfully implemented its planned programs and projects. Some projects take several years to complete, so in some cases they may not be completed in the same year in which they were initially funded, such. This is not unusual for projects involving major construction work.

### 4. *Summary of Citizen Participation Process and consultation process*

The City, in collaboration with other local jurisdictions and the consultant team, launched a comprehensive outreach strategy to enhance and broaden citizen participation in the preparation of the Consolidated Plan. The team informed the public that it was in the process of creating the 2025-2030 Consolidated Plan and encouraged public participation in the process by conducting a Regional Needs Survey, hosting regional forums in collaboration with other jurisdictions in the County, and conducting local hearings. In addition to the extensive consultation conducted for the ConPlan the City solicited additional input on this draft Action Plan. The City provides multiple opportunities for public review and comment on the Action Plan and on any substantial amendments to it. Public hearings on this Plan were held on April 15, 2025 and May 6, 2025. A notice of public hearings and an announcement of the 30-day public comment period was published in the Sunnyvale Sun on April 4, 2025. An initial draft of the Action Plan was released on April 4, 2025 on the City's website, and comments were accepted through May 6, 2025. It is the policy of the City of Sunnyvale to encourage and engage residents to participate in planning, implementation, and evaluation of its housing and community development programs.

5. *Summary of public comments*

All comments were accepted. Please refer to Attachment: "Proof of Publication and Citizen Participation Comments."

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

Not Applicable, all comments were accepted.

7. *Summary*

Not Applicable.

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

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

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

Agency Role	Name	Department/Agency
CDBG Administrator	SUNNYVALE	Department of Community Development
HOME Administrator	SUNNYVALE	Department of Community Development

**Table 1 – Responsible Agencies**

The City of Sunnyvale is the Lead and Responsible Agency for HUD entitlement programs in Sunnyvale. The Housing Division (HD), a division of the City’s Community Development Department (CDD), is responsible for administering the City’s HUD entitlement grants, including the Community Development Block Grant (CDBG) and HOME Investment Partnerships Program (HOME) grant. In order to continue receiving these grants, the City must develop and submit to HUD a five-year Consolidated Plan (ConPlan) and Annual Action Plans listing priorities and strategies for the use of these federal funds. The ConPlan describes how the City plans to use its CDBG and HOME funds to meet the housing and community development needs of its residents in the next five years. To update its 2025-2030 ConPlan, the City collaborated with the County of Santa Clara (County) and other entitlement jurisdictions in the County to identify and prioritize housing and community development needs across the region, and to develop strategies to meet those needs. The 2025-26 Action Plan covers the first year of the 2025-2026 ConPlan period.

**Consolidated Plan Public Contact Information**

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## **AP-10 Consultation – 91.100, 91.200(b), 91.215(I)**

### **1. Introduction**

The City has a long history of coordination and partnership with the local public housing provider, which is the Santa Clara County Housing Authority (SCCHA), and various assisted housing providers, such as Charities Housing, MidPen Housing Corp., First Community Housing, and others. The City also has a long history of coordinating with and/or providing funding to various local private and public health, mental health, and human services agencies, such as the County Mental Health Department, the local Valley Medical Center, and a variety of service providers that serve seniors, disabled clients, homeless clients, and other lower-income and at-risk clients.

In addition, in preparing the ConPlan, the City collaborated with eight other entitlement grantee jurisdictions (Entitlement Jurisdictions), including the cities of Cupertino, Gilroy, Mountain View, Milpitas, Palo Alto, San Jose, Santa Clara, and the County of Santa Clara (Urban County).

*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))*

Public participation played a central role in the development of the ConPlan. The Entitlement Jurisdictions launched an in-depth, collaborative regional effort to consult with community stakeholders, many of whom represented public or assisted housing providers, health and service agencies, as well as elected officials, City and County staff, and beneficiaries of entitlement programs, to inform and develop the priorities and strategies contained within the ConPlan. The City, in partnership with Root Policy and the other Entitlement Jurisdictions, facilitated a comprehensive outreach process to enhance coordination with these stakeholders and discuss new approaches to using the HUD entitlement grant funds for eligible activities, projects, and programs throughout the county and/or in specific cities. Multiple community meetings took place in late 2024, and early 2025 and included participation from a variety of stakeholders.

Additionally, Root Policy (the City's consultant), with direction from the Entitlement Jurisdictions, conducted a Regional Needs Survey to solicit input from residents, workers, and stakeholders in the region, which consisted of all of Santa Clara County. Survey respondents were informed that the purpose of this survey was to help the Entitlement Jurisdictions

determine local priorities for use of their HUD entitlement funds, and that these funds must be used to fund projects or programs that primarily serve lower income residents or neighborhoods with a higher percentage of lower-income residents. The Survey polled respondents about the level of need in their respective neighborhoods for various types of improvements, projects or programs that could possibly be funded by the HUD entitlement funds.

In addition to the extensive consultation in 2024 and 2025 noted above, the City solicited additional input for the FY2025-26 Annual Action Plan from community members at public hearings and planning meetings held on March 26, April 15, and May 6, 2025. The City and other community development organizations in the County coordinate frequently on a variety of initiatives. City Housing staff participates in a collaborative of HUD entitlement grantees within the County.

Monthly meetings are held to discuss activities, technical assistance issues, and identify future opportunities for coordination and cooperation. The City also coordinates with other regional agencies, such as the Housing Trust of Silicon Valley, SV@Home, Joint Venture Silicon Valley, NOVA, the County- wide Fair Housing Task Force, and Valley Transportation Authority, among others, to achieve the goals described within this Action 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 City has coordinated with the Santa Clara County Continuum of Care (CoC) for many years on its efforts to end and prevent homelessness in the County. The CoC, a broad group of stakeholders from throughout the County, plans and implements many of these efforts. The CoC is governed by the CoC Board, which takes a systems-change approach to preventing and ending homelessness.

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. City staff, including the Housing Officer and Housing Analyst, as well as staff of other cities, meet and consult with the County's CoC staff during the monthly county-wide "CDBG Coordinators Group" meetings, and communicate more frequently via email and/or phone on joint efforts.

In 2019, Destination: Home, a public-private partnership committed to ending chronic homelessness, in partnership with the County's CoC released the "Community Plan to End Homelessness in Santa Clara County" (Community Plan), which outlines strategies for ending homelessness in the County by 2025. These strategies were informed by those who participated in a series of community summits conducted between April and December 2019, including Sunnyvale HD staff and local stakeholders, among others. The Community Plan addresses the needs of unhoused people in the County, including those who are chronically homeless, families with children, veterans, and youth, as well as those at risk of homelessness. The City's current ConPlan and 2023-2031 Housing Element incorporate many policies and programs that are consistent with the Community Plan.

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

The City is not an ESG entitlement jurisdiction.

The CoC's HMIS is administered by the County Office of Supportive Services and their consultant, BitFocus, using Clarity Human Services software. The project meets and exceeds HUD's requirements for HMIS and complies with HUD HMIS Standards. The County's HMIS is used by many service providers to record information and report outcomes.

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

**Table 2 – Agencies, groups, organizations who participated**

1	Agency/Group/Organization	Abode
	Agency/Group/Organization Type	Affordable housing
	What section of the Plan was addressed by Consultation?	Needs Assessment Market Analysis
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Stakeholder focus group in December 2024
2	Agency/Group/Organization	Affirmed Housing
	Agency/Group/Organization Type	Affordable Housing
	What section of the Plan was addressed by Consultation?	Needs Assessment Market Analysis
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Stakeholder focus group in December 2024
3	Agency/Group/Organization	Alta Housing
	Agency/Group/Organization Type	Affordable housing
	What section of the Plan was addressed by Consultation?	Needs Assessment Market Analysis
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Stakeholder focus group in December 2024
4	Agency/Group/Organization	Bay Area Legal Aid
	Agency/Group/Organization Type	Fair housing and legal services
	What section of the Plan was addressed by Consultation?	Needs Assessment
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Stakeholder focus group in December 2024

5	Agency/Group/Organization	BHSD The Harm Reduction Project
	Agency/Group/Organization Type	County Government
	What section of the Plan was addressed by Consultation?	Needs Assessment
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Stakeholder focus group in December 2024
6	Agency/Group/Organization	Bill Willson Center
	Agency/Group/Organization Type	Services for Families and Children
	What section of the Plan was addressed by Consultation?	Needs Assessment
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Stakeholder focus group in December 2024
7	Agency/Group/Organization	Bridge Housing
	Agency/Group/Organization Type	City Government (San Jose) / Housing
	What section of the Plan was addressed by Consultation?	Needs Assessment Market Analysis
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Stakeholder focus group in December 2024
8	Agency/Group/Organization	Caminar
	Agency/Group/Organization Type	
	What section of the Plan was addressed by Consultation?	
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Stakeholder focus group in December 2024
9	Agency/Group/Organization	CARAS
	Agency/Group/Organization Type	County Government

	What section of the Plan was addressed by Consultation?	Needs Assessment
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Stakeholder focus group in December 2024
10	Agency/Group/Organization	CASA
	Agency/Group/Organization Type	Youth Mentorship
	What section of the Plan was addressed by Consultation?	Needs Assessment
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Stakeholder focus group in December 2024
11	Agency/Group/Organization	Catholic Charities
	Agency/Group/Organization Type	Faith based supportive services
	What section of the Plan was addressed by Consultation?	Needs Assessment
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Stakeholder focus group in December 2024
12	Agency/Group/Organization	City of Los Altos
	Agency/Group/Organization Type	City Government
	What section of the Plan was addressed by Consultation?	Needs Assessment Market Analysis
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Stakeholder focus group in December 2024
13	Agency/Group/Organization	City Team
	Agency/Group/Organization Type	Homelessness Services
	What section of the Plan was addressed by Consultation?	Needs Assessment

	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Stakeholder focus group in December 2024
14	Agency/Group/Organization	County Office of LGBTQ Affairs
	Agency/Group/Organization Type	City Government
	What section of the Plan was addressed by Consultation?	Needs Assessment
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Stakeholder focus group in December 2024
15	Agency/Group/Organization	Destination Home
	Agency/Group/Organization Type	Homeless prevention
	What section of the Plan was addressed by Consultation?	Needs Assessment
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Stakeholder focus group in December 2024
16	Agency/Group/Organization	Downtown Streets Team
	Agency/Group/Organization Type	Homeless prevention
	What section of the Plan was addressed by Consultation?	Needs Assessment
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Stakeholder focus group in December 2024
17	Agency/Group/Organization	Eden Housing
	Agency/Group/Organization Type	Affordable housing
	What section of the Plan was addressed by Consultation?	Needs Assessment Market Analysis
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Stakeholder focus group in December 2024

18	Agency/Group/Organization	Golden State Manufactured Homes Owners League
	Agency/Group/Organization Type	Nonprofit advocacy
	What section of the Plan was addressed by Consultation?	Needs Assessment Market Analysis
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Stakeholder focus group in December 2024
19	Agency/Group/Organization	Housing Trust Silicon Valley
	Agency/Group/Organization Type	CDFI
	What section of the Plan was addressed by Consultation?	Needs Assessment Market Analysis
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Stakeholder focus group in December 2024
20	Agency/Group/Organization	Jamboree Housing
	Agency/Group/Organization Type	Affordable housing
	What section of the Plan was addressed by Consultation?	Needs Assessment
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Stakeholder focus group in December 2024
21	Agency/Group/Organization	Lived Experience Advisory Board
	Agency/Group/Organization Type	Homeless prevention
	What section of the Plan was addressed by Consultation?	Needs Assessment
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Stakeholder focus group in December 2024
22	Agency/Group/Organization	Life Moves

	Agency/Group/Organization Type	Supportive Housing
	What section of the Plan was addressed by Consultation?	Needs Assessment
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Stakeholder focus group in December 2024
23	Agency/Group/Organization	Next Door Solutions to Domestic Violence
	Agency/Group/Organization Type	Domestic Violence Survivor Resources
	What section of the Plan was addressed by Consultation?	Needs Assessment
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Stakeholder focus group in December 2024
24	Agency/Group/Organization	Path Ventures
	Agency/Group/Organization Type	Homelessness services
	What section of the Plan was addressed by Consultation?	Needs Assessment Market Analysis
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Stakeholder focus group in December 2024
25	Agency/Group/Organization	Pride Social
	Agency/Group/Organization Type	Advocacy
	What section of the Plan was addressed by Consultation?	Needs Assessment
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Stakeholder focus group in December 2024
26	Agency/Group/Organization	Project Sentinel
	Agency/Group/Organization Type	Fair Housing Legal Services

	What section of the Plan was addressed by Consultation?	Needs Assessment
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Stakeholder focus group in December 2024
27	Agency/Group/Organization	Rebuilding Together Peninsula & Silicon Valley
	Agency/Group/Organization Type	Home Rehabilitation
	What section of the Plan was addressed by Consultation?	Needs Assessment
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Stakeholder focus group in December 2024
28	Agency/Group/Organization	Resources for Community Development
	Agency/Group/Organization Type	Affordable housing
	What section of the Plan was addressed by Consultation?	Needs Assessment Market Analysis
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Stakeholder focus group in December 2024
29	Agency/Group/Organization	San Andreas Regional Center
	Agency/Group/Organization Type	Supportive Services for Residents with Disabilities
	What section of the Plan was addressed by Consultation?	Needs Assessment
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Stakeholder focus group in December 2024
30	Agency/Group/Organization	Santa Clara County Housing Authority
	Agency/Group/Organization Type	Public housing authority

	What section of the Plan was addressed by Consultation?	Needs Assessment Market Analysis
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Stakeholder focus group in December 2024
31	Agency/Group/Organization	Satellite Affordable Housing Associates
	Agency/Group/Organization Type	Affordable housing
	What section of the Plan was addressed by Consultation?	Needs Assessment Market Analysis
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Stakeholder focus group in December 2024
32	Agency/Group/Organization	Senior Adults Legal Assistance
	Agency/Group/Organization Type	Fair Housing Legal Services
	What section of the Plan was addressed by Consultation?	Needs Assessment
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Stakeholder focus group in December 2024
33	Agency/Group/Organization	Silicon Valley Independent Living Center
	Agency/Group/Organization Type	Services for people with disabilities
	What section of the Plan was addressed by Consultation?	Needs Assessment Market Analysis
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Stakeholder focus group in December 2024
34	Agency/Group/Organization	SOMOS Mayfair
	Agency/Group/Organization Type	Community Advocacy/Families

	What section of the Plan was addressed by Consultation?	Needs Assessment
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Stakeholder focus group in December 2024
35	Agency/Group/Organization	Sourcewise
	Agency/Group/Organization Type	Services for older adults and people with disabilities
	What section of the Plan was addressed by Consultation?	Needs Assessment Market Analysis
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Stakeholder focus group in December 2024
36	Agency/Group/Organization	The LGBTQ Youth Space
	Agency/Group/Organization Type	Community advocacy organization
	What section of the Plan was addressed by Consultation?	Needs Assessment
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Stakeholder focus group in December 2024
37	Agency/Group/Organization	United Way Bay Area
	Agency/Group/Organization Type	Supportive services
	What section of the Plan was addressed by Consultation?	Needs Assessment
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Stakeholder focus group in December 2024
38	Agency/Group/Organization	Upwards
	Agency/Group/Organization Type	Childcare services
	What section of the Plan was addressed by Consultation?	Needs Assessment

	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Stakeholder focus group in December 2024
39	Agency/Group/Organization	Vista Center for Blind and Visually Impaired
	Agency/Group/Organization Type	Services for people with disabilities
	What section of the Plan was addressed by Consultation?	Needs Assessment Market Analysis
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Stakeholder focus group in December 2024
40	Agency/Group/Organization	WeHOPE
	Agency/Group/Organization Type	Unhoused nonprofit service provider
	What section of the Plan was addressed by Consultation?	Needs Assessment Market Analysis
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Stakeholder focus group in December 2024
41	Agency/Group/Organization	YWCA Golden Gate Silicon Valley
	Agency/Group/Organization Type	Supportive services for domestic violence survivors
	What section of the Plan was addressed by Consultation?	Needs Assessment
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Stakeholder focus group in December 2024

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

There were no agency types that were not consulted as part of the 2025-2030 Consolidated Plan process.

*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	Destination:Home	The D:H plan provides strategies for ending homelessness and increasing affordable housing stock in the County. This effort aligns with the Strategic Plan's goals to increase/support Affordable Housing and Alleviate Homelessness.
General Plan 2023-2031	City of Sunnyvale	Two of the primary goals of each of these plans are essentially the same: Increase/Support Affordable Housing; and Addressing Homelessness. Both plans also have goals related to improving local housing stock and neighborhoods and addressing priority needs (non-housing community development needs). About 80% of the content of the two plans are very similar.
Comprehensive HIV Prevention & Care Plan	Santa Clara County HIV Planning Council for Prevention and Care	This plan guides the Santa Clara County HIV Planning Council for Prevention and Care in its development of a compassionate system of HIV prevention and care for the County. This effort aligns with the Strategic Plan's goal to address Other Community Development Needs
Regional Housing Need Plan San Francisco Bay Area	Association of Bay Area Governments	This plan quantifies the needs of the 9-county Bay Area, which includes Sunnyvale, primarily for new housing units to address population growth projected to occur in the next 8 years. The regional housing need is further divided into an allocation or RHNA for each county and city in the region. The plan indicates Sunnyvale needs nearly 6,700 new housing units during this period. This plan aligns with the Strategic Plan's goals to increase/support Affordable Housing and Alleviate Homelessness. Sunnyvale's Housing Element describes how the City can accommodate the new units through its zoning and General Plan and provide some affordable units by using its special funds for affordable housing.
SCCHA Moving to Work Annual Plan	Santa Clara County Housing Authority	Addresses housing authority updates and strategies pertaining to public housing and vouchers.

Name of Plan	Lead Organization	How do the goals of your Strategic Plan overlap with the goals of each plan?
Economic Development Strategic Plan 2024	City of Sunnyvale	Goals for strategic economic development to increase job opportunities, housing and investment in Sunnyvale.

**Table 3 – Other local / regional / federal planning efforts**

## **AP-12 Participation – 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***

It is the policy of the City of Sunnyvale to encourage and engage residents to participate in planning, implementation, and evaluation of its housing and community development programs.

The City encourages low- and moderate-income residents, minorities, those with disabilities, and non-English-speaking residents to attend community meetings and/or provide written comments on its plans. The City provides a statement in the languages identified in its Language Access Plan on all public notices regarding HUD-funded activities, and sends public notices to organizations representing the groups listed above. In accordance with the Citizen Participation Plan, the City will provide translation services to any resident who requests such services in advance at such hearings and meetings. The City has translated its primary Housing Program brochures into Spanish, in accordance with the Language Access Plan.

### **Sunnyvale Request for Proposals**

The City has a long-standing practice of issuing a request for proposals (RFP), annually for capital/housing projects and every second year for human services grants, to solicit applications for CDBG and HOME funds available to the City. This process aids in gathering community input on local needs and helps the City identify projects and programs that are eligible for and interested in HUD funding and have demonstrated capacity for successful implementation and compliance with HUD requirements. Staff issues the RFP, evaluates proposals for eligibility, scores the proposals according to criteria approved by the Housing and Human Services Commission, and provides its scores and funding recommendations to the Commission and Council for review. The Commission holds a public hearing before making its own recommendations on the proposed funding allocations, which are advisory to the Council, which approves the final funding awards as part of the annual Action Plan hearing. These programs and projects are also addressed in the ConPlan, as it is assumed that similar types of projects are likely to be implemented in additional years, depending on funding availability.

### **Public Notice and Availability of the 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. Community members had opportunities to attend public hearings on April 15, 2025 and May 6, 2025. A notice of public hearings and an announcement of the 30- day public comment period was published in the Sunnyvale Sun on April 4, 2025. An initial draft

of the Action Plan was released on April 4, 2025, and comments were accepted through May 6, 2025. The proposed Plan was available for review at City Hall, and on the City’s website.

**Citizen Participation Outreach**

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/ attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
1	Pop up Tabling Event	Non-targeted / broad community	Pop up engagement at Sunnyvale Farmer’s Market on Jan 18, 2025 providing input on community needs	Approximately 30 residents participated and provided input on housing and community development needs	All comments were accepted	
2	Public Meeting	Non-targeted/ broad community	The Housing and Human Services Commission (HHSC) met on February 26, 2025, to hear presentations from non-profit profit agencies, in response to the Request for Proposals for CDBG and HOME funding for FY 2026.	The presenters answered questions of the commissioners and urged them to support their project/funding request.	All comments were accepted	

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/ attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
3	Public Meeting	Non-targeted/ broad community	The HHSC met on March 15, 2025, to discuss funding recommendations for FY 2025/26 CDBG/HOME grants. The HHSC recommended funding the HS proposals and capital project proposal in the amounts recommended by staff.	3 agencies representatives spoke during this meeting. See Attachment - "Proof of Publication and Citizen Participation Comments."	All comments were accepted	
4	Newspaper Ad	Non-targeted/ broad community	A display ad was published in the Sunnyvale Sun on April 4, 2025.	Attachment - "Proof of Publication and Citizen Participation Comments."	Not applicable	
5	Website	Non-targeted/ broad community	Draft Action Plan posted at: <a href="https://sunnyvale.ca.gov/property/housing/default.htm">https://sunnyvale.ca.gov/property/housing/default.htm</a>	Attachment - "Proof of Publication and Citizen Participation Comments."	Not applicable	<a href="https://sunnyvale.ca.gov/property/housing/default.htm">https://sunnyvale.ca.gov/property/housing/default.htm</a>
6	Public Meeting	Non-targeted/ broad community	The HHSC held a public hearing on April 15, 2025, to recommend to the City Council to approve the 2025 Action Plan.		Not applicable	

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/ attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
7	Public Meeting	Non-targeted/ broad community	The City council held a public hearing on May 6, 2025 to consider the Action Plan, consistent with the 2025-2030 Consolidated Plan.	Attachment - "Proof of Publication and Citizen Participation Comments."	Not applicable	

**Table 4 – Citizen Participation Outreach**

## Expected Resources

### AP-15 Expected Resources – 91.220(c)(1,2)

#### *Introduction*

As shown the table below, the City will receive \$1,038,891 in 2025 entitlement CDBG funds and \$383,899.50 in HOME funds. In addition, the City estimates that it will also receive approximately \$150,000 in CDBG program income in FY 2024/25, to be determined at end of fiscal year, and has \$192,000 in disencumbered funds from prior years. The City will deposit all PI into the RLF. This brings the total CDBG funding for FY 2025 to \$1,380,891. This amount may increase slightly, as additional program income may be received before the end of this fiscal year. Total available HOME funding for FY 2025 will be \$1095973.93 which includes the new allocation, plus estimated program income administrative reserves and unencumbered funds from the prior program year.

#### *Local (City) Resources*

The City has a local Housing Mitigation Fund (HMF) and Below Market Rate (BMR) In-Lieu Funds for the development, rehabilitation and/or acquisition of affordable housing. Since December 2020, the City allocated about \$70 million to six affordable housing developments) through three separate competitive funding availabilities. Awarded developments include Meridian (397 S. Mathilda Ave), Ira D Hall Square (1178 Sonora Court), Orchard Gardens (245 W. Weddell Dr), 1171 Sonora Court, 295 S. Mathilda Ave, and 352 E. Java Drive. Combined these projects will increase the affordable housing stock by over 900-units. In addition to Housing Mitigation Funds, the City also has funds available in its Housing Successor Agency Low-Mod Housing Fund, these funds are allocated outside of the Action Plan process, but with a similar goal of expanding and preserving the City's affordable housing stock.

#### *Other Public Resources*

##### Low-Income Housing Tax Credit Program (LIHTC)

The LIHTC program provides federal and state tax credits for developers and investors who agree to set aside all or a percentage of their rental units for low-income households for no less than 30 years. Most recently, MidPen Housing's Ira D. Hall Square (1178 Sonora) was awarded tax credits for their 175 unit development in 2023.

## Homeless Emergency and Rapid Transition to Housing (HEARTH) and Emergency Shelter Grants (ESG)

Santa Clara County serves as lead agency for the County's Continuum of Care (CoC), which receives HeARTH Act, ESG, and similar federal grants to provide shelter, housing, and supportive services to homeless people residing anywhere in the County. The City has contributed some of its local funds to various county-wide projects and programs that often receive CoC support as well, such as shelter facilities, transitional and permanent supportive housing, tenant-based rental assistance, and supportive services.

### *Private Resources*

Most of the City's housing and human services programs leverage various sources of private financing. The City encourages the participation of local lenders in its housing and/or community development projects as needed. The City is a founding member of the Housing Trust of Santa Clara County, which raises voluntary contributions from the public and private sectors for affordable housing projects within the County. The City has contributed some of its local housing funds to the Trust, which then uses those seed funds to seek matching contributions from corporations and various other sources.

**Anticipated Resources**

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
CDBG	public - federal	Acquisition Admin and Planning Economic Development Housing Public Improvements Public Services	1,038,891.00	150,000.00	192,000.00	1,380,891.00	4,155,564.00	Housing Rehabilitation; Public Infrastructure and Facilities; Public Services; Economic Development; Alleviation of Homelessness; Administration. Expected amount available for remainder of plan is 4x the annual allocation as funding is uncertain.
HOME	public - federal	Acquisition Homebuyer assistance Homeowner rehab Multifamily rental construction Multifamily rental rehab Construction for ownership TBRA	383,899.50	100,000.00	612,074.43	1,095,973.93	1,535,596.00	Administration and Planning Activities Tenant Based Rental Assistance.

**Table 5 - Expected Resources – Priority Table**

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

Entitlement Funds

Through the SCCHA and affordable housing developers, the City utilizes benefits from additional federal programs to provide community development activities, affordable housing activities, and supportive services. The other federal grant programs include:

- Section 8 Housing Choice Voucher Program;
- Section 202;
- Section 811; and
- Affordable Housing Program (AHP) through the Federal Home Loan Bank.

The City pursues and encourages its partner agencies to seek all available public and private funding sources in order to achieve the goals of the Consolidated Plan. Most projects and activities secure funding from a variety of sources, including public and private sector donations, grants, loans, and in-kind materials and services.

Most of the City's housing and human services programs leverage various sources of private financing. The City encourages the participation of local lenders in its housing and/or community development projects as needed. Tax credit projects such as Ira D. Hall Square, Block 15, Benner Plaza, and Onizuka Crossing, required millions of dollars in private equity and financing for construction and related costs. The City requires all applicants for CDBG and HOME funds for capital projects to provide a match of at least 25% to receive funding. For CDBG public services proposals, this match may consist of some in-kind materials and services. Most applicants provide a match in excess of 25%.

Matching funds may include other available financing sources, such as tax credits, other public sector loans or grants, private capital or donations, rent proceeds, and/or the value of in-kind services (i.e., volunteer and staff services or pro-bono professional services used to implement the capital project). The City often provides more local funds than CDBG or HOME funds to assist major affordable housing projects, since those local funds are often available in larger amounts than federal funds.

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

In recent years, the City has made several publicly owned properties available for affordable housing development, which is one of the needs identified in this plan. These projects included the Fair Oaks Plaza, Onizuka Crossing, Habitat Homes, Parkside Studios, Meridian, and Ira D. Hall Square. Another City-owned site known as 295 S. Mathilda of the Downtown Specific Plan is currently under Planning Entitlement review for 120 units of affordable housing.

*Discussion*

HUD allocations are critical to overcoming barriers; however, it is not sufficient to address all the needs of LMI households. Therefore, the City will continue to leverage other funding sources to provide services to populations in need.

## Annual Goals and Objectives

### AP-20 Annual Goals and Objectives

#### Goals Summary Information

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
1	Affordable Housing	2025	2030	Affordable Housing	Citywide Target	Affordable Housing	CDBG: \$439,779.00 HOME: \$57,584.93	Homeowner Housing Rehabilitated: 14 Household Housing Unit Other: 1
2	Expanding Economic Opportunity for Low Income HH	2025	2030	Non-Housing Community Development	Citywide Target	Expanding Economic Opportunities for LI Households	CDBG: <del>\$577,534.00</del> \$235,604.42	Jobs created/retained: <del>15</del> 7 Jobs Other: <del>60</del> 20 Other
3	Public Services	2025	2030	Homeless Non-Homeless Special Needs Non-Housing Community Development	Citywide Target	Community Development	CDBG: \$155,800.00	Public service activities other than Low/Moderate Income Housing Benefit: 500 Persons Assisted
4	Administration	2025	2030	Affordable Housing Homeless Non-Homeless Special Needs Non-Housing Community Development Administration	Citywide Target	Affordable Housing Homelessness Community Development Expanding Economic Opportunities for LI Households	CDBG: \$207,778.00 HOME: \$38,389.00	Other: 1 Other
5	Homelessness	2025	2030	Affordable Housing Homeless	Citywide Target	Homelessness	HOME: \$1,000,000.00	Tenant-based rental assistance / Rapid Rehousing: 40 Households Assisted

**Table 6 – Goals Summary**

**Goal Descriptions**

1	Goal Name	Affordable Housing
	Goal Description	Assist in the creation, improvement, and preservation of affordable housing for lower-income and special needs households by supporting affordable rental housing, and continuing the Home Improvement Program. Affordable housing assistance is provided throughout the City, in order to avoid concentration of poverty, and to ensure fair access to affordable housing, rehabilitation assistance, and homeownership opportunities in all neighborhoods. Included 15% CHDO set aside for HOME.
2	Goal Name	Expanding Economic Opportunity for Low Income HH
	Goal Description	Support economic development activities that promote employment growth and help lower-income and/or homeless people secure and maintain jobs. WorkFirst Sunnyvale will assist <del>15</del> 7 unhoused residents obtain work, and <del>60</del> 20 homeless clients with job training/skills and classes to enable them to obtain or improve their employment and housing opportunities. Upwards / WeeCare will assist 8 microenterprise childcare facilities by providing coaching and digital tools to optimize operations allowing efficient management and expanding access to affordable working families
3	Goal Name	Public Services
	Goal Description	Assist clients with basic needs, such as food, shelter, transportation, health & mental health care, employment assistance/training, legal aid, etc
4	Goal Name	Administration
	Goal Description	Administrative allocation for oversight and management of CDBG and HOME. Includes \$26,415 in Fair Housing Services funded from CDBG Admin. Eligible Activity (Matrix Code): 21D.
5	Goal Name	Homelessness
	Goal Description	Prevent homelessness through the Tenant Based Rental Assistance Program. Rental assistance and ongoing case management and employment assistance to households who are unhoused or at risk of homelessness.

## Projects

### AP-35 Projects – 91.220(d)

#### Introduction

The activities that the City will undertake in FY 2025/26 using CDBG and HOME funds include: human services grants; rental housing rehabilitation and energy efficiency; employment development services for homeless and at-risk clients; access improvements, fair housing services, and program administration, as shown below. All of these activities are eligible for the indicated funding type based on federal regulations associated with these grants, and all of them meet one or more priority needs as identified through the City's citizen participation process.

#### Projects

#	Project Name
1	CDBG Administration and Monitoring
3	Minor Home Improvement Grants/Loans Program
4	Major Rehabilitation Program (RLF)
5	WorkFirst Sunnyvale CBDO Economic Development Activity
6	Upwards Care Boost Program
7	Public Services
8	Fair Housing Services
9	HOME Administration and Monitoring
10	Tenant Based Rental Assistance (TBRA)
11	CHDO Set Aside

**Table 5 - Project Information**

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

#### Funding Priorities

The projects listed above were selected based on the needs identified in the Consolidated Plan, and in response to the proposals for funding received, and an evaluation of project feasibility.

Each year the City solicits proposals from local organizations for CDBG and HOME funding for eligible housing and community development programs or projects in Sunnyvale. The Request for Proposals sets forth the types of public services (human services) programs, capital and housing projects that are eligible for CDBG or HOME funding from the City and explains the City's process for evaluating and scoring proposals, determining award amounts, and approving awards. The City provides human

services grants for public services which address identified priority needs and principally benefit lower-income people in Sunnyvale.

Applications for the human services grants are solicited every other year, following hearings held by the Housing and Human Services Commission (HHSC) and Council to determine the City's current "priority human service needs." The "Priority Needs" for the City of Sunnyvale's Community Development Block Grant Program were determined through a series of community meetings held between October 2024 and January 2025 and were adopted as part of the 2025-2030 Consolidated Plan in accordance with regulations established by HUD.

FY 2025/26 will be the first year of a two-year funding cycle for human services grantees who will have their contracts automatically renewed, adjusted for any variation of funding received.

#### Obstacles to Meeting Underserved Needs

In the past several years, the primary obstacle to meeting underserved local needs in the near term has been the significant delays and continued uncertainty regarding federal appropriations for the CDBG and HOME programs, and other HUD funded programs such as Section 8, as well as changes to the LIHTC created by the recent federal tax reform bill. The region also continues to struggle finding a qualified CHDO to allocate funds toward.

## AP-38 Project Summary

### Project Summary Information

1	Project Name	CDBG Administration and Monitoring
	Target Area	Citywide Target
	Goals Supported	Administration
	Needs Addressed	Affordable Housing Homelessness Community Development Expanding Economic Opportunities for LI Households
	Funding	CDBG: \$181,363.00
	Description	Program administration for CDBG activities.
	Target Date	6/30/2026
	Estimate the number and type of families that will benefit from the proposed activities	N/A
	Location Description	Citywide
	Planned Activities	N/A
2	Project Name	Minor Home Improvement Grants/Loans Program
	Target Area	Citywide Target
	Goals Supported	Affordable Housing
	Needs Addressed	Affordable Housing
	Funding	CDBG: \$199,779.00
	Description	The Home Improvement Program provides small grants and loans for minor improvements, such as: energy efficiency upgrades, exterior painting, emergency repairs, roof repairs and replacements, and accessibility improvements. Homes must be owned and occupied by a lower-income household to be eligible for this program.
	Target Date	6/30/2026

	Estimate the number and type of families that will benefit from the proposed activities	Assist at least 12 households with minor home improvement grants or loans.
	Location Description	Citywide
	Planned Activities	The Home Improvement Program provides small grants and loans for minor improvements, such as energy efficiency upgrades, exterior painting, emergency repairs, roof repairs and replacements, and accessibility improvements. Homes must be owned and occupied by a lower-income household to be eligible for this program.
3	Project Name	Major Rehabilitation Program (RLF)
	Target Area	Citywide Target
	Goals Supported	Affordable Housing
	Needs Addressed	Affordable Housing
	Funding	CDBG: \$240,000.00
	Description	To issue loans to qualifying single-family or mobile-homeowners, many seniors, who need major rehabilitation performed on their home for habitability purposes, including Activity Delivery Cost (CDBG matrix code 14H Rehabilitation Administration).
	Target Date	6/30/2026
	Estimate the number and type of families that will benefit from the proposed activities	Approximately 2-3 households will benefit from this program
	Location Description	Citywide
	Planned Activities	To issue loans to qualifying single-family or mobile-homeowners, many seniors, who need major rehabilitation performed on their home for habitability purposes.
4	Project Name	WorkFirst Sunnyvale CBDO Economic Development Activity
	Target Area	Citywide Target
	Goals Supported	Expanding Economic Opportunity for Low Income HH
	Needs Addressed	Expanding Economic Opportunities for LI Households
	Funding	CDBG: <del>\$513,534.00</del> \$171,604.42

	Description	This program provides work-readiness, job placement assistance, and supportive services for homeless and at-risk clients. This program is administered by a valid Community Based Development Organization, as determined by HUD.
	Target Date	<del>6/30/2026</del> 11/24/2025
	Estimate the number and type of families that will benefit from the proposed activities	Assist <del>60</del> 20 homeless clients with job training and job-placement services, to enable them to obtain or improve their employment and housing opportunities.
	Location Description	Citywide
	Planned Activities	This program provides work-readiness, job placement assistance, and supportive services for homeless and at-risk clients. This program is administered by a valid Community Based Development Organization, as determined by HUD.
5	Project Name	Upwards Care Boost Program
	Target Area	Citywide Target
	Goals Supported	Expanding Economic Opportunity for Low Income HH
	Needs Addressed	Expanding Economic Opportunities for LI Households
	Funding	CDBG: \$64,000.00
	Description	This program provides support to microenterprise childcare facilities by providing coaching and digital tools to optimize operations allowing efficient management and expanding access and affordability to working families
	Target Date	6/30/2026
	Estimate the number and type of families that will benefit from the proposed activities	Assist 8 microenterprise childcare facilities
	Location Description	Citywide
	Planned Activities	To create Teaching Assistant positions to guide microenterprises to learn to optimize payment and marketing operations, access to free software, and maximize business capacity, affecting access and price of childcare.
6	Project Name	Public Services
	Target Area	Citywide Target

	Goals Supported	Public Services
	Needs Addressed	Community Development
	Funding	CDBG: \$155,800.00
	Description	Assist clients with basic needs, such as food, shelter, transportation, health & mental health care, employment assistance/training, legal aid, etc.
	Target Date	6/30/2026
	Estimate the number and type of families that will benefit from the proposed activities	Assist approximately 500 households with human services through 4 separate non-profit programs that offer food, counseling, and foster youth support.
	Location Description	Citywide
	Planned Activities	Assist clients with basic needs, such as food, shelter, transportation, health & mental health care, employment assistance/training, legal aid, etc.
7	Project Name	Fair Housing Services
	Target Area	Citywide Target
	Goals Supported	Administration
	Needs Addressed	Affordable Housing
	Funding	CDBG: \$26,415.00
	Description	Provide fair housing services to low-income households. Fair Housing Services funded from CDBG Administration Eligible Activity (Matrix Code): 21D
	Target Date	6/30/2026
	Estimate the number and type of families that will benefit from the proposed activities	25 low-income households of Sunnyvale will benefit from this proposed activity.
	Location Description	Citywide
	Planned Activities	Provide fair housing services to low-income households
8	Project Name	HOME Administration and Monitoring
	Target Area	Citywide Target

	Goals Supported	Affordable Housing Administration
	Needs Addressed	Affordable Housing Homelessness Community Development Expanding Economic Opportunities for LI Households
	Funding	HOME: \$38,389.00
	Description	Funds are used for administering the HOME program, includes costs of HOME capital project management, tracking grant funds and program income, subrecipient monitoring, reporting, and compliance with federal requirements such as environmental, labor, and anti-discrimination. Indirect costs (overhead) are also included in program administration.
	Target Date	6/30/2026
	Estimate the number and type of families that will benefit from the proposed activities	N/A
	Location Description	Citywide
	Planned Activities	Funds are used for administering the HOME program, includes costs of HOME capital project management, tracking grant funds and program income, subrecipient monitoring, reporting, and compliance with federal requirements such as environmental, labor, and anti-discrimination. Indirect costs (overhead) are also included in program administration.
9	Project Name	Tenant Based Rental Assistance (TBRA)
	Target Area	Citywide Target
	Goals Supported	Affordable Housing Homelessness
	Needs Addressed	Affordable Housing Homelessness
	Funding	HOME: \$1,000,000.00
	Description	Rental assistance and ongoing case management and employment assistance to households who are unhoused or at risk of homelessness.
	Target Date	6/30/2026

	Estimate the number and type of families that will benefit from the proposed activities	Provide 40 low-income households with rent and security deposit assistance
	Location Description	Citywide
	Planned Activities	To provide rental assistance and ongoing case management and employment assistance to households who are unhoused or at risk of homelessness.
10	Project Name	CHDO Set Aside
	Target Area	Citywide Target
	Goals Supported	Affordable Housing
	Needs Addressed	Affordable Housing
	Funding	HOME: \$57,584.93
	Description	To provide funding to a qualified Sunnyvale CHDO with a project site.
	Target Date	6/30/2026
	Estimate the number and type of families that will benefit from the proposed activities	N/A - No CHDO application was received for 2025 funds
	Location Description	TBD
	Planned Activities	Identify eligible Sunnyvale CHDO with a project site.

**AP-50 Geographic Distribution – 91.220(f)**

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

Investments will be allocated citywide for affordable housing services and related capital projects, homeless services, fair housing, and public services.

**Geographic Distribution**

Target Area	Percentage of Funds
Citywide Target	100

**Table 6 - Geographic Distribution**

**Rationale for the priorities for allocating investments geographically**

Most of the CDBG and/or HOME-funded programs and services are provided on a city-wide basis to income-eligible and/or special needs households. Certain capital projects are assisted at a specific site, based on the location of the project, but projects may be proposed in any area of the City. Projects that qualify for CDBG funding based on the area benefit method are limited to areas with the required proportion of lower- and moderate-income residents as determined by HUD.

Human services are supported in a number of facilities and locations throughout the City, and in some cases just outside the City, as long as Sunnyvale residents are being served by the program. Affordable housing assistance is generally provided anywhere in the City, as opportunities arise, in order to avoid concentration of poverty, and to ensure fair access to affordable rental housing, rehabilitation assistance, and homeownership opportunities in all neighborhoods. The City does not have any blighted areas requiring major redevelopment, and private development is occurring throughout the City.

**Discussion**

N/A

## Affordable Housing

### AP-55 Affordable Housing – 91.220(g)

#### Introduction

The City’s housing programs are intended to prevent and/or end homelessness, improve the quality, affordability, and/or accessibility of housing, and preserve, maintain, and extend the useful life of existing affordable housing. The goals below include only the new CDBG and HOME activities to be funded in FY 2025/26. Other activities funded in prior years’ Action Plans through non-HUD programs, will continue to be funded using carry-over funds, and will assist additional households.

<b>One Year Goals for the Number of Households to be Supported</b>	
Homeless	40
Non-Homeless	12
Special-Needs	0
Total	52

**Table 7 - One Year Goals for Affordable Housing by Support Requirement**

<b>One Year Goals for the Number of Households Supported Through</b>	
Rental Assistance	40
The Production of New Units	0
Rehab of Existing Units	12
Acquisition of Existing Units	0
Total	52

**Table 10 - One Year Goals for Affordable Housing by Support Type**

#### Discussion

N/A

## **AP-60 Public Housing – 91.220(h)**

### **Introduction**

This section is not applicable as there is currently no official public housing in Sunnyvale. The City collaborates with the SCCHA on its efforts to provide Section 8 vouchers, mortgage credit certificates, supportive services and other assistance to Sunnyvale residents. The City also supports the HACSC in its efforts to increase federal appropriations for Section 8 and other affordable housing programs in Sunnyvale and in the County.

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

Not applicable due to no official public housing in Sunnyvale. Details provided in Discussion section.

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

Not applicable due to no official public housing in Sunnyvale. Details provided in Discussion section.

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

Not applicable due to no official public housing in Sunnyvale. Details provided in Discussion section.

### **Discussion**

#### Needs of Public Housing

This section is not applicable as there is currently no official public housing in Sunnyvale. The City collaborates with the SCCHA on its efforts to provide Section 8 vouchers, mortgage credit certificates, supportive services and other assistance to Sunnyvale residents. The City also supports the HACSC in its efforts to increase federal appropriations for Section 8 and other affordable housing programs in Sunnyvale and in the County.

The City has partnered with the Housing Authority in recent years on several Sunnyvale housing projects which were awarded project-based vouchers, including Block 15, the Fair Oaks Senior Housing project, two senior group homes, Parkside Studios, Onizuka Apartments, and Edwina Benner Plaza.

## **AP-65 Homeless and Other Special Needs Activities – 91.220(i)**

### **Introduction**

This Action Plan includes a planned allocation of \$513,534 for a program that helps individuals experiencing homelessness obtain jobs (WorkFirst Sunnyvale). WorkFirst Sunnyvale is an economic development activity facilitated by a valid Community Based Development Organization (CBDO), Sunnyvale Community Services (SCS). In 2021, HUD officially confirmed that SCS is a valid CBDO. The WorkFirst Sunnyvale program specifically serves the City’s unhoused population by recruiting them to become a “team-member;” team members receive job training and job seeking support services, coupled with wrap-around case management, as a holistic approach to serving the individual. The WorkFirst Sunnyvale program provides Job Squad workshops to team members and works to partner with local employers such as Streets Team Enterprises, who hires team members who have successfully completed the job training/workshop series and provides career paths into various industries coupled with ongoing support.

WorkFirst maintains a close relationship with the local shelter and service-providers, which is another source to recruit team members and create opportunities for work. There is also a link between the WorkFirst Sunnyvale and Tenant Based Rental Assistance program, as once Team Members are connected to the WorkFirst Program and case management services, they are able to access housing opportunities such as the TBRA program, which has shown to be successful tool for getting these individuals housed. All services are voluntary and person centered.

In addition to funding various public services, several of which address homelessness and basic needs, the City continues to participate in the coordinated efforts to end homelessness throughout the County. Since December 2020, the City approved about \$40 million in funds to assist the development of Meridian, 1178 and 1171 Sonora Ct., and Orchard Gardens, Mathilda, and Java Drive, which will increase the City’s affordable housing supply by about 900-units.

*Describe the jurisdictions one-year goals and actions for reducing and ending homelessness including reaching out to homeless persons (especially unsheltered persons) and assessing their individual needs*

The WorkFirst Sunnyvale program includes outreach to individuals experiencing homelessness and assessment of their needs. To assess the needs of each client – Downtown Streets Team (DST) and Sunnyvale Community Services (SCS) facilitate outreach at local encampments, and areas where individuals experiencing homelessness reside and/or congregate.

*Addressing the emergency shelter and transitional housing needs of homeless persons*

Several of the public services sub-recipients (including Bill Wilson Center), provide emergency shelter, transition housing, and services to households experiencing homelessness and victims of domestic

violence. In addition, the County funds a year-round family shelter in Sunnyvale with up to 30 semi-congregate “pods” that receives referrals from the Coordinated Entry system.

*Helping homeless persons (especially chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth) make the transition to permanent housing and independent living, including shortening the period of time that individuals and families experience homelessness, facilitating access for homeless individuals and families to affordable housing units, and preventing individuals and families who were recently homeless from becoming homeless again*

Funded activities that help unhoused individuals transition to permanent housing includes WorkFirst Sunnyvale . The total CDBG funding planned for this activity is about ~~\$513,534~~ \$171,604.42 in 2025.

*Helping low-income individuals and families avoid becoming homeless, especially extremely low-income individuals and families and those who are: being discharged from publicly funded institutions and systems of care (such as health care facilities, mental health facilities, foster care and other youth facilities, and corrections programs and institutions); or, receiving assistance from public or private agencies that address housing, health, social services, employment, education, or youth needs.*

See discussion below.

### *Discussion*

Several of the Human Services grants will support the provision of services intended to prevent homelessness of Sunnyvale residents including the grants to Sunnyvale Community Services, , and Bill Wilson Center, as well as the fair housing services provided by Project Sentinel, who offers eviction support and advocacy, and addresses discrimination practices that can lead to homelessness. In addition to CDBG funded activities, the City also provides assistance to other programs that aim to prevent homelessness using local funds, and previous year HOME funds. These include grants to Senior Adults Legal Services, funding for tenant-landlord mediation programs, and the TBRA program.

## **AP-75 Barriers to affordable housing – 91.220(j)**

### **Introduction:**

Land use controls, site improvement requirements, fees and exactions, permit processing procedures, and various other issues may act as barriers to affordable housing development. Additionally, land costs, construction costs, and market financing contribute to the cost of housing development and reinvestment and can potentially hinder the production of new affordable housing.

As part of its 2023-31 Housing Element update, the City of Sunnyvale conducted an analysis of both governmental and non-governmental constraints on affordable housing development and found the following, as listed below. The City is actively working to implement new policy and programs to reduce barriers to development.

### ***Land Use Controls***

- Mixed-use parking requirements involve the use of a parking calculator that is not available to the public. Parking requirements for studios and efficiency units in the Downtown district could be reduced.
- Several residential design guidelines are subjective, which has the potential to delay planning approvals.
- The City must continue to support the production of ADUs by limiting constraints and ensuring that the zoning code complies with State law.
- The Zoning Code does not explicitly allow employee housing of six or fewer employees, which may constrain farmworker housing.
- The Zoning Code may result in constraints to housing types for persons with special needs, including group homes, SROs, supportive housing, emergency shelters, low barrier navigation centers, and residential facilities.
- The Zoning Code may constrain the adaptive reuse of existing structures in industrial districts.
- The Zoning Code may constrain some missing middle housing types in low-density, single-family zoning districts.
- Affordable housing and other higher density residential developments may be constrained by zoning regulations in Higher Opportunity Areas in southern Sunnyvale.

### ***Processing and Permitting Procedures***

- There is no established program to process SB 35 applications.
- Residential planning permit procedures may lack clarity, increasing processing times, and do not identify objective design standards.

### ***Fees and Exactions***

- Some development impact fees may be higher than other jurisdictions, which may increase overall residential development costs.
- Park dedicated in-lieu fees for Dual Urban Opportunity units with an urban lot split may be higher than other jurisdictions, which may act as a barrier to SB 9 projects.

### ***Housing for Persons with Disabilities***

- The Zoning Code’s definition of “family” may cause constraints on housing for persons with disabilities.
- Reasonable accommodation findings may be a constraint on the development of housing for persons with disabilities.

### ***Non-governmental Constraints***

- Lack of financing for affordable housing development severely constrains the creation of deed-restricted housing that is affordable for lower-income households.
- Lack of affordable financing is a barrier to homeownership for low- to moderate-income households.
- Lack of affordable financing prevents many lower-income homeowners from completing needed accessibility improvements and repairs.

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

The City does not impose any public policies that unreasonably constrain housing development. There are no growth limitations or rent control policies, and property tax policies are largely set by the State. The City’s land use designations and zoning are supportive of development of a wide variety of housing types, including single- and multi-family housing, ownership and rental, mobile homes, manufactured/modular housing, and so on. The City follows the State building code, and its fees and charges are reasonable and consistent with prevailing prices in the region. Since 2018, 6,605 new housing units were issued building permits, with 1,008 of those affordable to very low-, low-, or moderate-income households.

In 2023, the City adopted its 2023-2031 Housing Element, which includes a Constraints Analysis, as required under California Housing Element law (Government Code 65580), to analyze city policies and land use regulations to determine if they had any negative effects on development. The State determined, with its certification in March 2024, that the City does not currently implement policies that create barriers to affordable housing. As noted above, thousands of new dwelling units of various types and price points have been developed and additional units renovated in recent years, in most cases

without any direct assistance from the City. This demonstrates that the City's policies do not unduly constrain residential development. In addition, the City has successfully assisted a number of affordable housing developments in recent years, which demonstrates that City policies do not have negative effects on assisted housing production. Non-governmental barriers, primarily market factors such as high land costs, construction costs, and high prevailing market prices for housing, have been the primary challenges facing jurisdictions in the region, including Sunnyvale, in recent years, not city land use policies. These barriers are addressed, within the City's limited ability to address them, through the housing activities listed above and through the goals and policies listed in the Housing Element.

*Discussion:*

N/A

## **AP-85 Other Actions – 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 City has addressed obstacles to meeting underserved needs by adopting programs to generate local funds for affordable housing through impact fees or new development of affordable units (inclusionary zoning). The primary obstacle to meeting unmet needs is the continued decline in federal appropriations for affordable housing and community development programs. The City has established local policies to address needs to the extent possible with local resources.

#### *Actions planned to foster and maintain affordable housing*

Please see AP-35 (i.e., Affordable Housing Rehabilitation, Fair Housing Services, and Home Improvement Program).

#### *Actions planned to reduce lead-based paint hazards*

The City provides financial assistance to income-eligible homeowners to abate lead-based paint hazards through its Home Improvement Program. Paint grants and loans, as well as housing rehabilitation loans, are provided, as well as free lead-based paint testing and education services. Lead-based paint hazards in rental housing can also be addressed through housing rehabilitation loans.

#### *Actions planned to reduce the number of poverty-level families*

In 2014 the City adopted a new minimum wage ordinance increasing the local minimum wage, as of 2025 it is currently \$19.00/hour. It will be adjusted annually thereafter by the CPI. This action alone will help many local low-wage workers increase their household incomes to above the federal poverty levels.

The North Valley Workforce and Investment Board (“NOVA”) helps prepare lower-income and unemployed residents of Sunnyvale for career growth and stable employment. NOVA provides employment and training services to low-income workers and dislocated professionals within Sunnyvale and the surrounding region under the federal Workforce Investment Act (WIA), with a goal of helping these clients obtain jobs and improve career prospects. In addition, many of the human services supported by the City help impoverished families meet their basic needs in the short term, or help them achieve living-wage employment.

The WorkFirst Sunnyvale Program is also a major anti-poverty program that helps Sunnyvale residents who are currently homeless or at imminent risk of homelessness increase their incomes through job training and placement, and other employment-supportive services.

*Actions planned to develop institutional structure*

The institutional structure for carrying out the City's housing and community development activities consists of the City's cooperative relationships within its departments and other government agencies, local residents, non-profit organizations, and other institutions involved in the activities described herein.

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

The City and other community development organizations in the County coordinate frequently on a variety of initiatives. The City Housing Division staff participates in a collaborative of HUD entitlement grantees within the County, which holds quarterly meetings to discuss activities, technical assistance issues, and identify future opportunities for coordination and cooperation between local governments, housing providers, social service agencies, and the Housing Authority.

The City also participates in the County's Continuum of Care (CoC) meetings, comprised of governmental agencies, homeless service and shelter providers, unhoused individuals, housing advocates, affordable housing developers, and various private parties, including businesses and foundations. A CoC Steering Committee lead the charge to develop the 2022-2025 Community Plan to End Homelessness, which seeks to create a comprehensive and coordinated system of affordable housing and supportive services for the prevention, reduction, and eventual end of homelessness. The Plan provides a common guide for the County, cities, service providers, the faith community, the business sector, philanthropy, and the broader community to follow in addressing local housing and the goals and services needs for homeless people. The actions included in this Plan to address housing needs and homelessness are consistent with the CoC's plans and policies. The County of Santa Clara is gearing up to develop a new Community Plan, and the City of Sunnyvale plans to be part of the community process. The City's Housing Officer has served on the CoC's "Review and Rank" panel, evaluating and scoring applications for CoC funding, for the past three years.

Sunnyvale also coordinates with other regional agencies, such as the Housing Trust of Silicon Valley, Joint Venture Silicon Valley, NOVA, the County-wide Fair Housing Task Force, and the Valley Transportation Authority, and a number of other non-profit or public agencies, to achieve the goals described within this Action Plan.

**Discussion:**

## Program Specific Requirements

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

**Introduction:**

Overall Benefit: FY 2025-2026

#### 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	240,000
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
<b>Total Program Income:</b>	<b>240,000</b>

#### 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.	90.00%

**HOME Investment Partnership Program (HOME)  
Reference 24 CFR 91.220(l)(2)**

1. A description of other forms of investment being used beyond those identified in Section 92.205 is as follows:

N/A

2. A description of the guidelines that will be used for resale or recapture of HOME funds when used for homebuyer activities as required in 92.254, is as follows:

Not applicable: The City has not allocated any HOME funds for homebuyer program activities since 2014. The City does not plan to fund any home buyer loans with HOME funds for the foreseeable future, since market-rate home prices in the City are far too high for such a program to be feasible, and the City has enough local (non-federal) Housing funds to meet demand for down payment assistance loans related to its inclusionary housing program.

For several years prior to 2014, the City allocated HOME funds for a First-Time Home Buyer (FTHB) Program, but only a very small number of HOME loans were made, and those were used to buy price-restricted affordable homes through the City's inclusionary home buyer program. These homes are subject to a thirty-year resale restriction. Currently there are four outstanding FTHB loans made with HOME funds at that time. These four loans are subject to the "resale" restriction rather than the "recapture" provision, consistent with the City's First Time Home Buyer Program guidelines, and the inclusionary program's resale restrictions. These restrictions are also included in the HOME loan documents and affordability covenants recorded against the home. The FTHB Program Guidelines, available online, and the provisions of the City's HOME Promissory Note and Loan Agreement comply with the resale provisions and requirements set forth in 24 CFR 92.254, and were approved by HUD in 2011. For the four participants who purchased inclusionary homes, the "resale option" was used to meet HOME program requirements. Although the market-rate home purchase option was made available for the several years during which the HOME FTHB program operated, and during that time the City had loan documents and guidelines available to impose the "recapture" provisions, the City never made any HOME loans to assist with purchase of market-rate homes, as none ever progressed to an escrow closing. The City does not plan to allocate HOME funds to home buyer activities in the future because the unpredictability of such transactions occurring in any given year does not mesh well with the expenditure deadlines imposed by the HOME regulations, and because there is no inventory of market-rate homes affordable to lower-income buyers.

3. A description of the guidelines for resale or recapture that ensures the affordability of units acquired with HOME funds? See 24 CFR 92.254(a)(4) are as follows:

Please see above. The City's FTHB program has not been funded with HOME funds since 2014 and the City does not intend to fund such activities in the future. The four outstanding HOME-funded FTHB loans made before 2014 used the resale method, which is a 30-year price restriction imposed through the City's inclusionary housing program (a.k.a. Below Market Rate Home Ownership Program, Sunnyvale Municipal Code 19.67) documents and is also included in the FTHB loan documents. For more information about the FTHB guidelines and the BMR Program, please see the information on the City's website:

<https://sunnyvale.ca.gov/civicax/filebank/blobdload.aspx?BlobID=22887> [note that Guidelines still reference HOME funds as a possible funding source, although the City is no longer allocating HOME funds to this program.

4. Plans for using HOME funds to refinance existing debt secured by multifamily housing that is rehabilitated with HOME funds along with a description of the refinancing guidelines required that will be used under 24 CFR 92.206(b), are as follows:

Not Applicable. The City has not and does not plan to use HOME funds to refinance existing debt on multi-family housing.

5. If applicable to a planned HOME TBRA activity, a description of the preference for persons with special needs or disabilities. (See 24 CFR 92.209(c)(2)(i) and CFR 91.220(l)(2)(vii)).

The TBRA program, funded by HOME entitlement funds, require participants to have an income of less than 50% of the area median income. This preference is due to the lack of affordable housing compared to the demand for it in Sunnyvale.

6. If applicable to a planned HOME TBRA activity, a description of how the preference for a specific category of individuals with disabilities (e.g. persons with HIV/AIDS or chronic mental illness) will narrow the gap in benefits and the preference is needed to narrow the gap in benefits and services received by such persons. (See 24 CFR 92.209(c)(2)(ii) and 91.220(l)(2)(vii)).

Economic conditions have caused the cost of housing in the area to increase faster than average incomes and has left housing options unaffordable to more and more residents. This has widened the gap of services for those with incomes below the AMI and the City's HOME TBRA program narrows the gap in these services by providing rental and down payment assistance.

7. If applicable, a description of any preference or limitation for rental housing projects. (See 24 CFR 92.253(d)(3) and CFR 91.220(l)(2)(vii)). Note: Preferences cannot be administered in a manner that

limits the opportunities of persons on any basis prohibited by the laws listed under 24 CFR 5.105(a).

Not applicable.

**Housing Trust Fund (HTF)**  
**Reference 24 CFR 91.220(I)(5)**

1. Distribution of Funds

- a. Describe the eligibility requirements for recipients of HTF funds (as defined in 24 CFR § 93.2).
  
- b. Describe the jurisdiction's application requirements for eligible recipients to apply for HTF funds.
  
- c. Describe the selection criteria that the jurisdiction will use to select applications submitted by eligible recipients.
  
- d. Describe the jurisdiction's required priority for funding based on geographic distribution, which is a description of the geographic areas of the State (including areas of low-income and minority concentration) in which it will direct assistance during the ensuing program year.
  
- e. Describe the jurisdiction's required priority for funding based on the applicant's ability to obligate HTF funds and undertake eligible activities in a timely manner.
  
- f. Describe the jurisdiction's required priority for funding based on the extent to which rents for units in the rental project are affordable to extremely low-income families.
  
- g. Describe the jurisdiction's required priority for funding based on the financial feasibility of the project beyond the required 30-year period.

h. Describe the jurisdiction's required priority for funding based on the merits of the application in meeting the priority housing needs of the jurisdiction (such as housing that is accessible to transit or employment centers, housing that includes green building and sustainable development features, or housing that serves special needs populations).

i. Describe the jurisdiction's required priority for funding based on the location of existing affordable housing.

j. Describe the jurisdiction's required priority for funding based on the extent to which the application makes use of non-federal funding sources.

2. Does the jurisdiction's application require the applicant to include a description of the eligible activities to be conducted with HTF funds?

3. Does the jurisdiction's application require that each eligible recipient certify that housing units assisted with HTF funds will comply with HTF requirements?

4. **Performance Goals and Benchmarks.** The jurisdiction has met the requirement to provide for performance goals, consistent with the jurisdiction's goals established under 24 CFR 91.215(b)(2), by including HTF in its housing goals in the housing table on the SP-45 Goals and AP-20 Annual Goals and Objectives screens.

5. **Rehabilitation Standards.** The jurisdiction must establish rehabilitation standards for all HTF-assisted housing rehabilitation activities that set forth the requirements that the housing must meet upon project completion. The jurisdiction's description of its standards must be in sufficient detail to determine the required rehabilitation work including methods and materials. The standards may refer to applicable codes or they may establish requirements that exceed the minimum requirements of the codes. The jurisdiction must attach its rehabilitation standards below. If the jurisdiction will not use HTF funds for the rehabilitation of housing, enter "N/A".

In addition, the rehabilitation standards must address each of the following: health and safety; major systems; lead-based paint; accessibility; disaster mitigation (where relevant); state and local codes, ordinances, and zoning requirements; Uniform Physical Condition Standards; Capital Needs Assessments (if applicable); and broadband infrastructure (if applicable).

**6. Resale or Recapture Guidelines.** Below, the jurisdiction must enter (or attach) a description of the guidelines that will be used for resale or recapture of HTF funds when used to assist first-time homebuyers. If the jurisdiction will not use HTF funds to assist first-time homebuyers, enter "N/A".

**7. HTF Affordable Homeownership Limits.** If the jurisdiction intends to use HTF funds for homebuyer assistance and does not use the HTF affordable homeownership limits for the area provided by HUD, it must determine 95 percent of the median area purchase price and set forth the information in accordance with §93.305. If the jurisdiction will not use HTF funds to assist first-time homebuyers, enter "N/A".

**8. Limited Beneficiaries or Preferences.** Describe how the jurisdiction will limit the beneficiaries or give preferences to a particular segment of the extremely low- or very low-income population to serve unmet needs identified in its consolidated plan or annual action plan. If the jurisdiction will not limit the beneficiaries or give preferences to a particular segment of the extremely low- or very low-income population, enter "N/A."

Any limitation or preference must not violate nondiscrimination requirements in § 93.350, and the jurisdiction must not limit or give preferences to students. The jurisdiction may permit rental housing owners to limit tenants or give a preference in accordance with § 93.303 only if such limitation or preference is described in the action plan.

**9. Refinancing of Existing Debt.** Enter or attach the jurisdiction's refinancing guidelines below. The guidelines describe the conditions under which the jurisdiction will refinance existing rental housing project debt. The jurisdiction's refinancing guidelines must, at minimum, demonstrate that rehabilitation is the primary eligible activity and ensure that this requirement is met by establishing a minimum level of rehabilitation per unit or a required ratio between rehabilitation and refinancing. If the jurisdiction will not refinance existing debt, enter "N/A."

**Discussion:**

The City does not use any of the methods addressed in Questions 1-4 above in administering its HOME programs.

For housing unaffordability and the gap in benefits and services, see Question 6 above. Economic conditions have led to growing housing uncertainty and affordability.