

CITY OF HAYWARD ANNUAL ACTION PLAN

Fiscal Year 2026-27 | HUD Program Year 2026

Executive Summary

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

1. Introduction

The City of Hayward’s Fiscal Year (FY) 2026–2027 Annual Action Plan describes the planned use of Community Development Block Grant (CDBG) funds and other applicable federal resources during HUD Program Year 2026. The Action Plan is the second year of the City’s 2025–2029 Consolidated Plan and identifies priority needs, funding allocations, and implementation strategies for housing and community development activities benefiting low- and moderate-income residents.

This Draft Annual Action Plan is being released for public review and comment prior to receipt of final HUD entitlement awards. Funding levels, program income, and prior-year resource amounts are preliminary and subject to reconciliation and adjustment prior to submission to the U.S. Department of Housing and Urban Development (HUD).

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 FY 2026–2027 Annual Action Plan establishes funding priorities and performance objectives consistent with the City’s Consolidated Plan, Strategic Roadmap, and adopted housing and community development policies.

Primary objectives for Program Year 2026 include:

- Supporting access to public infrastructure and facilities in low- and moderate-income areas
- Preserving existing owner-occupied housing through rehabilitation and safety improvements
- Facilitating affordable temporary shelter activities, as applicable

- Providing public services for special needs populations and low- and moderate-income households
- Maintaining effective program administration and regulatory compliance

Planned CDBG investments are anticipated to support:

- Approximately 36 households through housing rehabilitation
- Approximately 985 individuals through public services and coordinated referral activities
- Public facility and infrastructure improvements serving approximately 16,475 residents
- Ongoing program administration, financial management, and compliance oversight

Final outcome targets will be updated following confirmation of entitlement funding and program income.

3. Evaluation of past performance

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

The City's performance in prior program years informed the development of the FY 2026–2027 Action Plan. Past activities emphasized housing rehabilitation, public services delivery, and public facility improvements in low- and moderate-income areas, supported by established administrative and monitoring systems.

Prior performance evaluations indicate that:

- Housing rehabilitation activities have remained consistent with planned service levels
- Public services funding has been structured to comply with statutory expenditure limits
- Financial management and reporting systems have supported timely expenditure and regulatory compliance
- Subrecipient monitoring and contract administration procedures have been maintained in accordance with HUD requirements

Lessons learned from prior program years continue to inform project selection, funding allocations, and administrative practices.

4. Summary of Resident Participation Process and consultation process

Summary from resident participation section of plan.

The City conducted consultation and resident participation activities in accordance with its adopted Community Participation Plan.

Key participation and consultation activities will include:

- Publication of public notices in English and Spanish
- A minimum 30-day public comment period from April 17, 2026 through May 17, 2026
- Publication of the Annual Action Plan Draft on the City’s Website
- Hayward City Council public meeting on May 5, 2026
- Outreach through print, electronic, and web-based platforms

The City consulted with regional and local partners, including Alameda County, EveryOne Home (Continuum of Care), housing providers, and service agencies, to inform the development of the Action Plan and ensure coordination with regional planning efforts. Public input and agency consultation were considered in accordance with adopted procedures and integrated into the final Action Plan, as applicable.

5. Summary of public comments

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

Public comments will be solicited during the public review period and at City Council meetings. All comments received will be documented, reviewed, and evaluated in accordance with established procedures.

A summary of comments received and the City’s responses will be included in the final submission to HUD.

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

At the time of preparation of this Draft Annual Action Plan for public comment, no public comments have been identified as requiring formal non-acceptance. All comments received from the time of drafting through the end of the public comment period will be reviewed and considered in accordance with adopted procedures.

If applicable, any comments not accepted and the reasons for non-acceptance will be documented in the final submission.

7. Summary

The FY 2026–2027 Annual Action Plan outlines the City of Hayward’s proposed use of CDBG and related resources for Program Year 2026. Planned activities emphasize housing rehabilitation, public services, public facility improvements, and program administration consistent with HUD national objectives and regulatory requirements.

The proposed projects and funding allocations:

Project Category	Activity Type	Primary Objective	National Proposed Allocation
Program Administration	Planning, Management, Monitoring	N/A-Administration	\$309,982
Public Facilities	Capital Improvements	LMA / LMC	\$630,424
Public Services	Social Services Programs	LMC	\$234,502
Housing Rehabilitation	Owner-Occupied Rehab	LMC	\$375,000
Total CDBG Resources			\$1,549,908

All amounts are preliminary and subject to final entitlement determination, program income reconciliation, and prior-year fund verification. Final allocations will ensure compliance with applicable statutory limits.

For Program Year 2026, the City proposes to allocate Community Development Block Grant (CDBG) funds among program administration, public facilities, public services, housing rehabilitation, and housing-related support activities. Administrative funding will support program management, financial oversight, reporting, and monitoring functions necessary to ensure regulatory compliance.

Public facility funding is proposed for eligible capital improvements serving low- and moderate-income areas. Public services funding is proposed to support eligible programs assisting income-qualified individuals and households, including seniors and persons with disabilities. Housing rehabilitation funds are proposed to preserve owner-occupied housing through health, safety, and accessibility improvements. Housing and shelter-related activities may include support for affordable housing development or shelter operations, as applicable.

All proposed activities are structured to meet HUD national objectives and applicable regulatory requirements. Funding levels presented in this draft are subject to adjustment following receipt of final entitlement amounts and completion of the public participation process.

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

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

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

Agency Role	Name	Department/Agency
Lead Agency	HAYWARD	Community Services Division
CDBG Administrator	HAYWARD	Community Services Division

Table 1 – Responsible Agencies

The City of Hayward’s Community Services Division (CSD), within the City Manager’s Office, is the lead entity responsible for the preparation, implementation, and oversight of the Consolidated Plan and Annual Action Plans. CSD administers the City’s CDBG entitlement program and coordinates with internal departments, regional partners, and community-based organizations to carry out housing and community development activities in alignment with federal requirements and local priorities.

CSD works in coordination with the City Manager’s Office, Development Services, Public Works, Library Services, Police, and Fire Departments to implement public services, housing rehabilitation, and public facilities projects funded through CDBG and other sources. The Division also collaborates with Alameda County as part of the HOME Investment Partnerships Consortium and participates in the regional Continuum of Care administered by EveryOne Home.

Historically, the City has administered a competitive Community Agency Funding (CAF) process supported by both General Fund resources and a portion of the CDBG public services allocation. The City did not conduct a CAF solicitation in Program Year 2026 and instead allocated funds to activities administered directly or through existing subrecipients.

During Program Year 2026, the City will prioritize the administration of CDBG-funded activities through a combination of internal department-led projects and selected service providers, consistent with HUD eligibility and citizen participation requirements. Program oversight includes financial management, contract administration, performance monitoring, and compliance review. Public facilities activities anticipated for this program year include capital equipment improvements serving low- and moderate-income areas, implemented in coordination with relevant City departments.

The City anticipates that the competitive CAF process may resume in future program years, contingent upon future fiscal conditions and available administrative capacity.

Consolidated Plan Public Contact Information

Comments on the Fiscal Year 2026-2027 Annual Action Plan may be directed to:

Ember M. Padró y Pereira, Management Analyst
City of Hayward
Community Services Division
Phone: 510-583-4003
Email: ember.padro@hayward-ca.gov

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

1. Introduction

The City of Hayward and its partners in Alameda County have a history of collaborative efforts at the consumer and provider level, with a focus on coordination at the systems level. Through its participation in the EveryOne Home Continuum of Care (CoC), Hayward works with housing providers, public and private partners, and direct service agencies to support regional coordination and facilitate coordinated responses to homelessness and housing instability.

The CoC’s governance charter establishes the framework for stakeholder participation and oversight in meeting federally defined responsibilities under the Continuum of Care Program Rule at 24 CFR Part 578. Through its committee structure, the CoC convenes stakeholders, develops policies for the homeless response system, and tracks system-level outcomes. Stakeholders include individuals with lived experience of homelessness, elected officials, community-based organizations, service providers, and county and city government administrators. City staff are actively engaged in the work of the CoC, regularly attending meetings and serving on various committees and working groups.

In addition to CoC participation, City staff engage in multiple regional and local planning and coordination efforts to maintain collaboration among housing providers, service agencies, and governmental entities. These efforts include participation in regional planning initiatives, regular coordination meetings to support information sharing and maintain compliance with regional processes; mayoral and interjurisdictional convenings; and ad hoc working groups focused on homelessness, housing stability, and affordable housing development.

Through these consultation and coordination activities, the City seeks to support coordinated service delivery among participating agencies, maximize available resources, and support compliant service delivery for low- and moderate-income households and residents with special needs.

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

The City of Hayward works in coordination with Alameda County, regional partners, and local service providers to support collaboration among housing providers and public and

private health, behavioral health, and social service agencies serving low- and moderate-income residents and persons with special needs.

Through its participation in the EveryOne Home Continuum of Care (CoC), the City engages with housing providers, health and behavioral health agencies, and supportive service organizations to coordinate service delivery, align program priorities, and address administrative and service coordination barriers affecting housing stability and homelessness response. The CoC's governance structure provides a framework for stakeholder engagement, policy development, and performance monitoring across participating agencies.

City staff actively participate in CoC committees, interagency working groups, and regional planning efforts that bring together housing, health, and social service partners. These activities support information sharing, coordinated referrals, and alignment of local and regional resources. In addition, the City collaborates with County departments, nonprofit providers, and other jurisdictions through regular coordination meetings, joint planning initiatives, and data-sharing efforts that inform the design and implementation of CDBG-funded activities.

The City also coordinates, as appropriate, with departments and agencies responsible for emergency preparedness and disaster response, including the Hayward Fire Department and the City's Emergency Operations Center, to support continuity of housing and supportive services following emergency events. The Hayward Fire Department serves as the lead agency for local emergency management and coordinates development and implementation of the City's Emergency Response Plan. City departments, including those overseeing housing and homelessness programs, participate in Emergency Operations Center planning and response activities, as applicable.

The City of Hayward is located in an area where over 99 percent of households have access to multiple broadband service options, including cable, fiber, and wireless services. However, access to infrastructure does not necessarily equate to connectivity or consistent service. Accordingly, the City's CDBG-funded housing and service programs are structured to ensure that core services remain accessible through in-person, telephone, and paper-based processes. Access to housing and supportive services is therefore not dependent on digital platforms. Where appropriate, the City coordinates on a limited basis with County and regional partners regarding technology access initiatives that may support residents' use of online benefit and referral systems. Such coordination has occurred primarily through time-limited, grant-funded efforts and is not a core component of the City's CDBG program administration.

Through these coordination efforts, the City supports coordinated service delivery among participating agencies to facilitate housing stability and access to care for income-qualified residents.

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 of Hayward works in close coordination with Alameda County, regional partners, and local service providers to address homelessness and housing instability across multiple systems of care, including housing, behavioral health, health care, and social services.

The County's Continuum of Care, administered by EveryOne Home, coordinates local efforts to address homelessness by maintaining service capacity, promoting inter-jurisdictional cooperation, leveraging federal, state, and local resources, and standardizing data collection and performance monitoring. EveryOne Home facilitates year-round collaboration among service providers, local jurisdictions, and community stakeholders, including individuals with lived experience of homelessness.

The City of Hayward actively participates in the Continuum of Care through staff involvement in committees, working groups, and planning processes, and through participation in regional activities such as the bi-annual Point-in-Time Count. City staff regularly engage with County partners and service providers to share data, coordinate service delivery, and address identified administrative and service coordination barriers affecting housing stability and homelessness response.

Access to the County's Coordinated Entry System is administered at the regional level through Alameda County and EveryOne Home. Individuals and families experiencing homelessness or at risk of homelessness may access coordinated entry through participating nonprofit service providers, outreach teams, and referral partners, including community-based organizations and county-supported programs. Local outreach and shelter providers, including those serving Hayward residents, participate in coordinated entry processes and reserve appropriate program capacity for referrals, as applicable.

The City also collaborates with Alameda County and regional partners in the development and implementation of countywide strategic planning efforts, including the Home Together initiative and its ongoing refresh as Home Together 2030. These efforts support alignment of local and regional investments, coordination among service systems, and the design and

implementation of CDBG-funded activities serving low- and moderate-income residents and persons with special needs.

Through these coordination and consultation activities, the City maintains partnerships among housing providers, health and behavioral health agencies, and social service organizations, supports effective use of available resources, and facilitates coordinated service delivery for income-qualified populations.

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 of Hayward is not an entitlement Emergency Solutions Grant (ESG) grantee. However, the City works in collaboration with the local Continuum of Care, administered by EveryOne Home, and with Alameda County to assess local needs, coordinate funding priorities, and support alignment of CDBG-funded activities with regional homelessness response strategies and ESG program goals.

The City consults with Continuum of Care and County partners regarding performance standards and outcome measures for programs serving individuals and families experiencing homelessness. This coordination supports consistent evaluation of program effectiveness and facilitates alignment among CDBG, ESG, and other housing and supportive service resources.

Should the City receive ESG funds during the Consolidated Plan period, staff will consult with EveryOne Home and utilize the Alameda County Priority Home Partnership ESG Policies and Procedures Manual, which establishes policies and procedures for ESG recipients and subrecipients operating within Alameda County.

Through participation in HMIS governance, performance management, and data coordination activities led by the Alameda County Housing and Community Development Department and the Continuum of Care, the City supports systemwide data collection, outcome tracking, and program evaluation. While HMIS administration and access are managed at the County and provider level, the City engages with partner agencies to utilize available system data to inform planning, monitoring, and coordination efforts.

These activities contribute to coordinated service delivery, system performance, and ongoing assessment of strategies to reduce homelessness and facilitate housing stability.

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

Table 2 – Agencies, groups, organizations who participated

1	Agency/Group/Organization	City of Hayward
	Agency/Group/Organization Type	Housing Service-Fair Housing Other government - Local
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Homelessness Strategy Non-Homeless Special Needs Economic Development
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	The City of Hayward is the lead agency for the Annual Action Plan
2	Agency/Group/Organization	Alameda County Housing & Community Development
	Agency/Group/Organization Type	Housing Services - Housing Other government - County Regional organization Planning organization

<p>What section of the Plan was addressed by Consultation?</p>	<p>Housing Need Assessment Public Housing Needs Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Homelessness Strategy Non-Homeless Special Needs Anti-poverty Strategy Lead-based Paint Strategy</p>
<p>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</p>	<p>Bi-monthly and quarterly meetings, as well as staff participation in Home Together planning.</p>

3	Agency/Group/Organization	Alameda County CoC (EveryOne Home)
	Agency/Group/Organization Type	Housing Services - Housing Services-Children Services-Elderly Persons Services-Persons with Disabilities Services-Persons with HIV/AIDS Services-Victims of Domestic Violence Services-homeless Services-Health Services-Education Services-Employment Service-Fair Housing Services - Victims Publicly Funded Institution/System of Care Regional organization Planning organization
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Public Housing Needs Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Homelessness Strategy
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Coordinating meetings that provided informed understanding of homelessness issues and resources across Alameda County as well as help aligning goals and developing effective policy.

4	Agency/Group/Organization	ISPreports
	Agency/Group/Organization Type	Services - Broadband Internet Service Providers Services - Narrowing the Digital Divide
	What section of the Plan was addressed by Consultation?	Non-Homeless Special Needs Economic Development Market Analysis
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Publicly available data from ISPreports.org was reviewed to assess broadband availability and infrastructure conditions in Hayward. According to ISPreports.org, the City has access to multiple broadband service options, including cable, fiber, fixed wireless, DSL, and satellite services, with an estimated 99.72 percent of households having access to internet service.
5	Agency/Group/Organization	Hayward Fire Department
	Agency/Group/Organization Type	Agency - Managing Flood Prone Areas Agency - Emergency Management Other government - Local
	What section of the Plan was addressed by Consultation?	Housing Need 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?	The City coordinates with the Hayward Fire Department and Emergency Operations Center on emergency preparedness, disaster response, and continuity of operations planning. These activities support coordination related to housing stability and shelter services during emergency events.

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

There were no agency types not consulted intentionally. All comments were welcome and invited at multiple public meetings.

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?
Home Together 2030 (in development)	Alameda County	The Home Together 2030 planning process is developing an updated countywide homelessness response strategy that integrates system modeling, demographic and data analysis, stakeholder input, and Point-in-Time Count and systemwide data. The process supports coordinated investments and alignment of local and regional efforts to reduce homelessness and address documented service gaps.
2023–2031 Housing Element (6th Cycle)	City of Hayward	The Housing Element identifies the City’s housing conditions, needs, and implementation strategies and establishes policies to support affordable housing production, homelessness response, and fair housing goals consistent with the Consolidated Plan.
FY 2024–25 Strategic Roadmap	City of Hayward	The Strategic Roadmap articulates the City’s vision and priority initiatives, including housing stability, community safety, and quality of life, which align with the goals and objectives of the Consolidated Plan.
Let’s House Hayward! Homelessness Reduction Strategic Plan	City of Hayward	The Let’s House Hayward! Plan provides locally tailored strategies to address homelessness and housing instability and aligns with countywide planning efforts to guide interim housing and supportive service investments.
2025–2029 Regional Analysis of Impediments to Fair Housing	Alameda County (Regional Consortium)	The Regional AI identifies barriers to fair housing choice and recommends actions to affirmatively further fair housing across participating jurisdictions, informing the City’s housing and community development priorities.
2021 Resident Satisfaction Survey	City of Hayward	The Resident Satisfaction Survey provides community input on service needs, housing challenges, and neighborhood priorities and supports identification of priority needs addressed through CDBG-funded activities.
2024 Alameda County / City of Hayward Point-in-Time Count	EveryOne Home	The Point-in-Time Count provides baseline data on sheltered and unsheltered homelessness and service gaps that inform regional and local planning and coordination efforts.

Table 3 – Other local / regional / federal planning efforts

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

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

In accordance with its Community Participation Plan, the City of Hayward provides opportunities for residents and stakeholders to participate in the development of the Annual Action Plan through public notice, public meetings, and a minimum 30-day public comment period.

For Program Year 2026, the City will make the Draft Annual Action Plan available for public review and comment for a 30-day period from April 17, 2026 through May 17, 2026. Notice of the public comment period will be provided in accordance with the Community Participation Plan and will be published in English and Spanish through the City's customary public notice channels, including print, electronic, and web-based platforms.

During the public comment period, members of the community will be encouraged to submit written comments and to provide public input at City Council meetings, including the City Council work session at which the proposed CDBG allocations and Annual Action Plan will be presented. Meetings are conducted in person and, where applicable, include options for remote participation in accordance with State law and local procedures.

The Draft Annual Action Plan and proposed CDBG allocations will be presented to the City Council for a public hearing and consideration for adoption on May 5, 2026, in coordination with the City's annual budget review and approval process.

This Draft Annual Action Plan is being released for public review and comment. All comments received during the public comment period and at public meetings will be documented, reviewed, and responded to in accordance with adopted procedures. The City will incorporate applicable public input into the final Annual Action Plan prior to submission to the U.S.

Department of Housing and Urban Development. A summary of comments received and the City's responses will be included in the final submission.

Citizen Participation Outreach

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/ attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
1	Public Hearing Comment Period	Minorities Non-English Speaking - Specify other language: Spanish Persons with disabilities Non-targeted/broad community Residents of Public and Assisted Housing	Public Comment Period – April 17, 2026 through May 17, 2026	A summary of comments received and the City’s responses will be included in the final Action Plan submission.	A summary of comments received and the City’s responses will be included in the final Action Plan submission.	
2	Public Meeting	Minorities Non-English Speaking - Specify other language: Spanish Persons with disabilities Non-targeted/broad community Residents of Public and Assisted Housing	City Council Public Hearing – May 5, 2026	A summary of comments received and the City’s responses will be included in the final Action Plan submission.	A summary of comments received and the City’s responses will be included in the final Action Plan submission.	

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	Internet Outreach	Minorities Non-English Speaking - Specify other language: Spanish Persons with disabilities Non-targeted/broad community Residents of Public and Assisted Housing	Outreach on City website to notify of public comment period, work session, and public hearing	See entries for Work Session and Public Hearing.	See entries for Work Session and Public Hearing.	
4	Newspaper Advertisement	Minorities Non-English Speaking - Specify other language: Spanish Persons with disabilities Non-targeted/broad community Residents of Public and Assisted Housing	Public Notice regarding Draft Action Plan and Public Comment Period – April 17, 2026	See entries for Work Session and Public Hearing.	See entries for Work Session and Public Hearing.	

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)
5	Newspaper Advertisement	Minorities Non-English Speaking - Specify other language: Multiple through web browser translation Persons with disabilities Non-targeted/broad community Residents of Public and Assisted Housing	Public Notice regarding City Council Public Hearing – April 17, 2026	See entries for Work Session and Public Hearing.	See entries for Work Session and Public Hearing.	

Table 4 – Citizen Participation Outreach

Expected Resources

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

Introduction

The City of Hayward is a CDBG Entitlement jurisdiction and receives a portion of HOME funds as a member of the Alameda County HOME Consortium. As the direct recipient of HOME funding, Alameda County will include Program Year 2026 HOME projects and allocations as part of its Annual Action Plan. The City does not receive Emergency Solutions Grant (ESG) or Housing Opportunities for Persons with AIDS (HOPWA) funding. HOME funds are programmed the HOME Consortium level and are not addressed in this plan.

In addition to funds provided by the CDBG and HOME programs, the City will utilize local, county, and state resources to support community development goals, including public infrastructure and facilities improvements, housing preservation and production, public services, and economic development activities.

CDBG and HOME resources will be allocated to projects that meet HUD national objectives and comply with applicable federal financial management and reporting requirements.

Because the City prepares the Draft Annual Action Plan prior to receipt of final entitlement awards, anticipated resources for Program Year 2026 are estimates and are subject to change based on final HUD allocations, actual program income received, and the availability of prior-year funds.

Per CDBG Formula Program Allocations released by HUD on April 3, 2026, the City expects an entitlement of \$1,502,729 for Program Year 2026. Program income is conservatively estimated based on scheduled repayments from existing economic development loans and is projected at approximately \$47,179. Additional program income may be received from loan repayments or project closeouts; however, such amounts cannot be reliably projected in advance and are therefore not included in this estimate. Currently, anticipated resources for Program Year 2026 total \$1,549,908.

The City does not anticipate the availability of prior year funds for reallocation in Program Year 2026. Consistent with HUD guidance, funds previously programmed remain within their respective projects. Any additional funding not allocated by this draft plan, including final entitlement amounts or unanticipated program income, will be allocated proportionally among eligible activities or in accordance with City Council direction and applicable HUD requirements.

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 and Planning Economic Development Housing Public Improvements Public Services	1,502,729	47,179	0	1,549,908	4,041,537	

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

In addition to funds provided by HUD, the City of Hayward leverages Community Development Block Grant (CDBG) and HOME resources through coordinated planning and alignment with local, county, and regional funding sources.

Historically, the City has supported CDBG-funded activities through a combination of federal, local, and regional resources in order to advance community development, housing stability, and public service objectives. CDBG and HOME funds are coordinated with complementary programs administered by Alameda County and regional partners, including housing, transportation, and social services initiatives, to support integrated service delivery and reduce duplication of effort. This coordinated approach supports program outcomes and appropriate use of limited public resources.

The City seeks, to the extent practicable, to prioritize funding opportunities that do not require local matching contributions, in order to ensure that external funding sources are fully additive and do not displace existing local resources.

Where participation in programs with matching or cost-sharing requirements is necessary and consistent with City priorities, any required match will be provided solely through eligible local, unrestricted, private, or in-kind contributions, as determined by City leadership. CDBG funds will not be used to satisfy non-federal matching requirements.

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

The City of Hayward owns and manages a limited number of properties that may be suitable for housing or community development purposes. The most significant current inventory consists of properties acquired from the California Department of Transportation in connection with the State Route 238 corridor project.

As of Program Year 2026, the City has executed Disposition and Development Agreements for several of these parcels and continues to work with development partners to advance affordable housing projects and enforce applicable inclusionary housing requirements.

In addition, the City is undertaking efforts to facilitate internal coordination and documentation related to publicly owned property through the onboarding of a Real Property Manager, who is conducting a comprehensive inventory and appraisal of City-owned land. This work is intended to support informed decision-making regarding the potential use of publicly owned property for housing and community development objectives consistent with City priorities and fiscal conditions.

Discussion

The City of Hayward’s approach to allocating Community Development Block Grant (CDBG) funds for Program Year 2026 reflects both long-standing community development priorities and current fiscal and operational conditions. Funding decisions continue to be guided by the City’s Strategic Roadmap, the Let’s House Hayward! Strategic Plan, and the goals and priorities established in the Consolidated Plan.

For Program Year 2026, the City is placing increased emphasis on direct delivery of eligible public services, housing rehabilitation, and public facility improvements in order to maintain essential community development activities while ensuring effective stewardship of limited resources. Due to changing fiscal conditions, the City has temporarily paused its competitive community agency funding process and is instead focusing available CDBG resources on priority programs and projects that can be implemented and monitored directly by the City or through established partners.

The Community Services Commission continues to play an advisory role in reviewing overall funding priorities and providing community input, with public comment and City Council review serving as the primary mechanisms for final allocation decisions during this period.

Based on current estimates and available information, anticipated allocations for Program Year 2026 include funding for program administration, public services, housing rehabilitation activities, and neighborhood facilities projects. Among the public facilities projects under consideration, improvements to emergency response capacity at fire stations serving low- and moderate-income census tracts are currently being evaluated as a priority investment.

Annual Goals and Objectives

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

Estimate the number of extremely low-income, low-income, and moderate-income families to whom the jurisdiction will provide affordable housing as defined by HOME 91.215(b)

The City of Hayward participates in the Alameda County HOME Consortium and supports the implementation of consortium-funded housing programs through staff administration and oversight. HOME-funded activities, including tenant-based rental assistance programs such as Project Independence, are planned, funded, and reported at the county level and are reflected in the County’s Consolidated Plan. As such, housing units and households assisted through HOME-funded activities are not attributed to the City’s Annual Action Plan.

For Program Year 2026, the City’s primary locally administered affordable housing activity is its CDBG-funded home rehabilitation program, which supports the preservation of existing owner-occupied housing for low- and moderate-income senior households. Based on current program design and funding levels, the City expects to complete approximately 36 housing rehabilitation projects, including major rehabilitation activities administered by Habitat for Humanity and minor repairs and safety modifications administered by Rebuilding Together East Bay Network.

Goals Summary Information

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
1	1A. Facility & Infrastructure Access & Capacity	2025	2029	Non-Housing Community Development	Low- and Moderate-Income Census Tracts 4354, 4375, 4377.01, 4377.02	Expand/Facilitate Access to Public Infrastructure & Facilities	CDBG: \$630,424	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 16,475 Persons Assisted

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
2	2A. Preserve Existing Homeownership Housing	2025	2029	Affordable Housing	Citywide	Preserve, Protect, and Produce Housing Stock	CDBG: \$375,000	Homeowner Housing Rehabilitated: 36 Household Housing Units
3	3A. Provide Supportive Services for Special Needs	2025	2029	Non-Housing Community Development	Citywide	Public Services & Improve Quality of Life	CDBG: \$184,502	Homeless Person Overnight Shelter: 85 Persons Assisted
4	3B. Provide Vital Services for LMI Households	2025	2029	Non-Housing Community Development	Citywide	Public Services & Improve Quality of Life	CDBG: \$50,000	Public service activities other than Low/Moderate Income Housing Benefit: 900 Persons Assisted

Table 6 – Goals Summary

Goal Descriptions

1	Goal Name	1A. Facility & Infrastructure Access & Capacity
	Goal Description	Expand public infrastructure and access to public infrastructure and facilities through development activities for LMI persons and households. Public infrastructure activities include improvements to infrastructure in the jurisdiction such as roadway resurfacing and improvements to curbs and ramps on sidewalks for ADA compliance. Public facilities may include neighborhood facilities, community centers and parks and recreation facilities.
2	Goal Name	2A. Preserve Existing Homeownership Housing
	Goal Description	Retain homeownership opportunities for existing homeowners who fall within eligible categories, such as seniors living on fixed incomes, through home repair programs.

3	Goal Name	3A. Provide Supportive Services for Special Needs
	Goal Description	Homelessness response, prevention, and supportive services for special needs populations.
4	Goal Name	3B. Provide Vital Services for LMI Households
	Goal Description	Public services for LMI households, including referral and information services that connect residents to housing providers, food access programs, legal aid, and educational services.

AP-35 Projects - 91.420, 91.220(d)

Introduction

The following projects are Community Development Block Grant (CDBG)–eligible activities that meet applicable HUD national objectives. Project selection and funding allocations are guided by the City’s Citizen Participation Plan and informed through the adopted citizen participation process, Community Services Commission input, and City Council consideration.

For Program Year 2026, CDBG-funded activities include a combination of City-administered programs and services delivered through established partner organizations. All activities are subject to applicable federal, state, and local requirements, including procurement, contracting, financial management, and reporting standards. Final allocation amounts will be authorized by the City Council following public review, a work session, and a public hearing.

This Annual Action Plan is being released in draft form for public review and comment. Following the public comment period, the proposed projects and allocations are expected to be presented to the City Council for a public hearing consideration of adoption on May 5, 2026.

#	Project Name
1	CDBG: PY26 Administration (20%)
2	CDBG: PY26 Public Facilities & Infrastructure
3	CDBG: PY26 Public Services (15%)
4	CDBG: PY26 Housing Programs

Table 7 – Project Information

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

Allocation priorities for Program Year 2026 align with the City’s Strategic Roadmap, the Let’s House Hayward! Strategic Plan, and the goals and priorities established in the Consolidated Plan. CDBG investments support priority areas including housing preservation and stability, community safety and quality of life, public facilities and infrastructure, and services for low- and moderate-income households and persons with special needs.

Funding priorities also reflect findings from the Alameda County Analysis of Impediments to Fair Housing, released in January 2025, which identifies barriers to fair housing choice and recommends coordinated actions to support compliance with fair housing and

nondiscrimination requirements. CDBG resources are allocated to activities that support fair housing compliance activities, housing stability, and access to supportive services.

For Program Year 2026, allocations emphasize core housing and homelessness response functions, housing rehabilitation for low-income senior homeowners, public facility improvements in low- and moderate-income areas, and essential service coordination. Public services funding is primarily directed toward housing navigation, stabilization, and referral activities that connect residents to shelter, permanent housing, and supportive resources.

The City's allocation priorities are shaped by available federal resources, regulatory requirements, and administrative capacity. Annual entitlement levels, federal program restrictions, and internal oversight and compliance obligations limit the scale, scope, and pace at which activities can be implemented. In addition, the need to ensure consistent financial management, contract monitoring, and regulatory reporting places practical constraints on the number and type of activities that can be supported in a given program year.

These factors require the City to concentrate CDBG resources on a defined set of priority programs and projects that can be effectively administered, monitored, and sustained within existing operational structures. The City addresses these constraints through centralized program management, use of established service delivery partners, and ongoing review of project performance and compliance.

AP-38 Project Summary

Project Summary Information

1	Project Name	CDBG: PY26 Administration (20%)
	Target Area	
	Goals Supported	1A. Facility & Infrastructure Access & Capacity 2A. Preserve Existing Homeownership Housing 2B. Develop New Affordable Housing 3A. Provide Supportive Services for Special Needs 3B. Provide Vital Services for LMI Households
	Needs Addressed	Program Administration and Compliance
	Funding	CDBG: \$309,982
	Description	Citywide administration of the CDBG program within the statutory administrative cost limitation in Program Year 2026, including financial management, compliance monitoring, reporting, environmental review, contract administration, and fair housing activities, subject to the administrative cost cap.
	Target Date	6/30/2027
	Estimate the number and type of families that will benefit from the proposed activities	N/A
	Location Description	Citywide
	Planned Activities	Staff salaries and benefits; program planning and monitoring; financial management and reporting; contract administration; environmental review; fair housing activities; HUD compliance and oversight.
2	Project Name	CDBG: PY26 Public Facilities & Infrastructure
	Target Area	Low- and Moderate-Income Census Tracts (4354, 4375, 4377.01, 4377.02)
	Goals Supported	1A. Facility & Infrastructure Access & Capacity
	Needs Addressed	Expand/Improve Public Infrastructure & Facilities
	Funding	CDBG: \$630,424

	Description	Improvements to public facilities and infrastructure serving low- and moderate-income areas, including investments in emergency response capacity and other eligible facility improvements that support community safety and access to essential services.
	Target Date	6/30/2027
	Estimate the number and type of families that will benefit from the proposed activities	Approximately 16,475 low- and moderate-income residents residing in or served by designated service areas.
	Location Description	Targeted low- and moderate-income census tracts and associated service areas.
	Planned Activities	Acquisition and installation of emergency response equipment; facility upgrades; accessibility improvements; and related eligible public facility investments.
3	Project Name	CDBG: PY26 Public Services (15%)
	Target Area	Citywide
	Goals Supported	3A. Provide Supportive Services for Special Needs 3B. Provide Vital Services for LMI Households
	Needs Addressed	Public Services & Quality of Life Improvements
	Funding	CDBG: \$234,502
	Description	Provision of housing-focused public services and coordinated referral services for low-income and special needs populations, including individuals experiencing homelessness, persons with disabilities, seniors, and households facing housing instability. The 15% cap for public services is based on an estimated entitlement of \$1,300,000 plus \$47,179 in program income, subject to final entitlement and program income reconciliation.
	Target Date	6/30/2027
	Estimate the number and type of families that will benefit from the proposed activities	Approximately 85 individuals receiving housing navigation services and up to 900 unduplicated residents receiving coordinated referral assistance, based on prior year service levels.
	Location Description	Citywide

	Planned Activities	Partial support for Housing Navigation Center operations; coordinated intake and case management; referral and connection services through Alameda County 211; housing stabilization and support services.
4	Project Name	CDBG: PY26 Housing Programs
	Target Area	Citywide
	Goals Supported	2A. Preserve Existing Homeownership Housing 2B. Develop New Affordable Housing
	Needs Addressed	Preserve, Protect, and Produce Housing Stock
	Funding	CDBG: \$375,000
	Description	Owner-occupied housing rehabilitation and minor home repair services for low-income senior homeowners to preserve housing quality and safety.
	Target Date	6/30/2027
	Estimate the number and type of families that will benefit from the proposed activities	Approximately 36 low-income senior households receiving rehabilitation or safety-related repairs.
	Location Description	Citywide
	Planned Activities	Major and minor home rehabilitation; accessibility improvements; safety upgrades; health and code compliance repairs.

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

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

Allocation of CDBG funds focuses on serving low- and moderate-income residents to ensure access consistent with eligibility requirements to public facilities, housing assistance, and essential services. The City does not allocate funding solely based on geographic boundaries, as many funded activities are designed to serve eligible residents citywide under the Low/Mod Limited Clientele (LMC) national objective.

Hayward includes multiple census tracts designated as Low-Income by HUD, including Downtown (CT 4354) and portions of the Harder-Tennyson area in South Hayward (CTs 4375, 4377.01, and 4377.02). These areas have historically experienced higher concentrations of low- and moderate-income households and service needs.

For Program Year 2026, a significant portion of CDBG funding is anticipated to support place-based public facility improvements, including emergency response equipment at fire stations serving Low-Income census tracts. These activities are expected to primarily benefit residents in Downtown and Harder-Tennyson neighborhoods. Other housing and public service activities will continue to be provided on a citywide basis to eligible residents.

Activities meeting the LMC objective will continue to require income and demographic documentation in accordance with HUD recordkeeping requirements. Programs are designed to benefit low-income households, seniors, persons with disabilities, youth, and persons experiencing homelessness, regardless of residential location within the City.

Geographic Distribution

Target Area	Percentage of Funds
Citywide (LMC Activities)	To Be Determined
Downtown (CT 4354) and Harder-Tennyson Area (CTs 4375, 4377.01, 4377.02)	To Be Determined

Final percentages will be determined prior to HUD submission and reflected in the submitted version.

Rationale for the priorities for allocating investments geographically

CDBG-funded activities are prioritized based on eligibility, feasibility, demonstrated community need, and alignment with adopted policy priorities. Program participation is

determined by income and eligibility criteria rather than residential location.

Place-based investments are directed to Low-Income census tracts where infrastructure and facility improvements are expected to produce the greatest community benefit. Citywide activities are designed to ensure that eligible residents throughout Hayward have access to housing stabilization and essential services.

Discussion

The City's geographic investment strategy for Program Year 2026 combines place-based capital improvements with citywide service delivery activities. Public facility investments are prioritized in Low-Income census tracts where infrastructure and emergency response capacity can be improved through eligible capital expenditures. These investments are selected based on documented need, project readiness, and compliance with HUD national objectives.

Housing rehabilitation and public service activities are structured to operate on a citywide basis under the Low/Mod Limited Clientele national objective. Program eligibility is determined through income verification and program-specific criteria rather than geographic location. This approach supports consistent service delivery, facilitates program administration and monitoring, and allows the City to allocate limited CDBG resources in a manner that meets regulatory requirements while maintaining operational efficiency.

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

Introduction

The City of Hayward supports the preservation and maintenance of affordable rental and ownership housing for low- and moderate-income households through targeted housing programs, regulatory compliance, and coordination with regional partners. Current housing activities include administration of the Home Rehabilitation Program for low-income senior homeowners, implementation of the Affordable Housing Ordinance, and participation in the Alameda County HOME Consortium's tenant-based rental assistance programs.

The City continues to implement State-mandated housing and zoning requirements through its Housing Element and related Municipal Code amendments. These efforts include compliance with State density bonus laws, streamlined approval processes, and provisions supporting emergency shelters, transitional housing, and supportive housing. Together, these regulatory frameworks are designed to address identified development barriers and facilitate housing production within existing planning and infrastructure constraints.

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 development of affordable housing in Hayward is constrained by high land costs, construction and financing expenses, development fees, and infrastructure capacity limitations. The City addresses these barriers primarily through regulatory compliance, administrative streamlining, and targeted program administration.

Current actions include:

- Implementation of the City's Affordable Housing Ordinance and inclusionary housing requirements
- Ongoing implementation of Housing Element programs and zoning amendments
- Administration of by-right and streamlined development provisions authorized under State law
- Coordination with Alameda County and regional partners on housing assistance and planning activities
- Maintenance of home rehabilitation programs to preserve existing affordable housing stock

The City continues to rely on findings from regional housing and displacement studies, Housing Element updates, and the Alameda County Analysis of Impediments to Fair Housing to inform housing policy and program administration.

Discussion

During Program Year 2026, the City's primary housing-related investments will focus on preserving existing affordable housing and supporting housing stability through direct program delivery. CDBG resources will be used to fund home rehabilitation activities for eligible senior homeowners and to support services that facilitate access to housing and homelessness response systems.

Affordable housing development activities will continue to be pursued primarily through regional, State, and private financing mechanisms, with the City participating as a coordinating and regulatory partner when appropriate. Limited local discretionary resources and market conditions constrain the City's ability to initiate new development subsidies independently.

Through continued implementation of adopted housing policies, coordination with the Alameda County HOME Consortium, and administration of housing stabilization programs, the City will work to address structural and regulatory barriers to affordable housing within available fiscal and operational capacity.

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

Introduction

The City of Hayward administers housing and community development programs to address underserved needs, support housing stability, reduce environmental health risks, mitigate poverty, augment institutional capacity, and facilitate coordination among public and nonprofit service providers. These activities are implemented using Community Development Block Grant (CDBG) funds in combination with local, county, and state resources.

Actions planned to address obstacles to meeting underserved needs

The City provides targeted services to low- and moderate-income households, seniors, persons with disabilities, individuals experiencing homelessness, and other eligible populations. These services are delivered through a combination of City-administered programs and partnerships with qualified nonprofit providers.

Current constraints affecting service delivery include limited availability of federal and state funding, rising housing and service delivery costs, inflation affecting essential goods and services, demographic shifts associated with an aging population, and increased demand for homelessness and housing stabilization programs. In addition, structural limitations in accessing certain federal social service funding streams at the municipal level restrict the City's ability to directly expand service capacity.

Within these constraints, the City prioritizes programs with demonstrated outcomes and the ability to be effectively monitored and administered.

Actions planned to foster and maintain affordable housing

The City preserves affordable housing through a combination of direct investment, regulatory enforcement, and tenant protection programs. Primary activities include the owner-occupied housing rehabilitation program, which provides repairs and safety improvements for low-income senior homeowners to support long-term housing stability and aging in place.

The City also administers an ongoing rent review program and enforces multiple tenant protection ordinances, including just cause eviction requirements and relocation assistance provisions. These programs are designed to reduce displacement risk and maintain housing stability for lower-income renters. In addition, the City provides referrals to housing counseling, legal assistance, and affordable housing resources to support

residents at risk of housing loss.

Through participation in the Alameda County HOME Consortium, City staff administer tenant-based rental assistance programs funded and reported at the County level, contributing staff oversight and case coordination.

Actions planned to reduce lead-based paint hazards

Hayward contains a substantial number of housing units constructed prior to 1978 that may contain lead-based paint. In accordance with HUD and Environmental Protection Agency regulations, City staff engaged in housing rehabilitation activities maintain appropriate lead safety certifications.

All CDBG-funded rehabilitation projects comply with the EPA's Renovation, Repair, and Painting Rule and applicable HUD lead hazard control requirements. Contracting and inspection procedures incorporate lead-safe work practices and documentation standards.

Actions planned to reduce the number of poverty-level families

The City supports poverty reduction through coordinated service delivery, housing stabilization programs, transportation assistance, and access to legal, educational, and workforce resources.

CDBG-funded public services include homelessness response, housing navigation, and referral services. The City also collaborates with countywide information and referral systems to connect residents to food assistance, income support, healthcare, and housing resources.

In addition, Alameda County Measure BB funding supports the Hayward Operated Paratransit (HOP) program, which provides subsidized transportation for seniors and persons with disabilities. Measure BB funding supports subsidized transportation services for eligible seniors and persons with disabilities, supporting access to medical, employment, and community services.

Actions planned to develop institutional structure

The City administers housing and community development programs through established financial, procurement, and compliance systems that meet federal and local requirements. Program administration includes standardized contracting procedures, expenditure

controls, documentation protocols, and performance monitoring.

The City maintains internal operating procedures for CDBG program management and applies procurement thresholds and review standards that meet or exceed applicable regulatory requirements.

During Program Year 2026, the City is enhancing monitoring practices for subrecipients and contractors. This expanded documentation and verification activity builds on established compliance performance and increases documentation, site reviews, and financial verification. These efforts maintain operational visibility during periods of reduced grantmaking activity and demonstrate responsible stewardship of federal funds.

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

The City coordinates with nonprofit providers, county agencies, healthcare systems, and regional partners to support integrated service delivery. This coordination occurs through formal agreements, data sharing systems, and participation in regional planning and homelessness response networks.

The Hayward Housing Navigation Center participates in the Countywide Homeless Management Information System (HMIS) and coordinates services with healthcare, behavioral health, and housing providers. The anticipated full operation of the St. Regis Multiservice Campus, subject to funding availability and required approvals, will further consolidate housing navigation, medical respite, behavioral health, and supportive services at a single location serving individuals experiencing homelessness.

The City also coordinates with Alameda County, transit agencies, and transportation providers to align housing, mobility, and social service investments.

Discussion

CDBG resources are integrated with local, county, and state funding sources to support housing stability, homelessness response, senior services, and infrastructure improvements. While overall funding availability is limited, the City prioritizes programs with measurable outcomes and administrative feasibility.

During Program Year 2026, the City is emphasizing direct program administration, comprehensive monitoring, and targeted investments in housing rehabilitation, public facilities, transportation assistance, and coordinated service delivery. These actions are designed to maintain essential community development functions and ensure compliance

with federal requirements under current fiscal conditions.

Program Specific Requirements

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

Introduction

Community Development Block Grant Program (CDBG)

Reference 24 CFR 91.220(l)(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	47,179
2. The amount of proceeds from section 108 loan guarantees that will be used during the year to address the priority needs and specific objectives identified in the grantee's strategic plan.	0
3. The amount of surplus funds from urban renewal settlements	0
4. The amount of any grant funds returned to the line of credit for which the planned use has not been included in a prior statement or plan	0
5. The amount of income from float-funded activities	0
Total Program Income:	47,179

Other CDBG Requirements

1. The amount of urgent need activities	0
2. The estimated percentage of CDBG funds that will be used for activities that benefit persons of low and moderate income. Overall Benefit - A consecutive period of one, two or three years may be used to determine that a minimum overall benefit of 70% of CDBG funds is used to benefit persons of low and moderate income. Specify the years covered that include this Annual Action Plan.	100.00%, based on planned activities and subject to annual verification

Discussion