

City of Santee Citizen and Community Participation Plan

May 2020

The City of Santee (City) is an entitlement jurisdiction and receives Community Development Block Grant funding from the U.S. Department of Housing and Urban Development (HUD).

As an entitlement jurisdiction, the City is required to prepare the following:

- A Five-Year Consolidated Plan (Con Plan);
- An Annual Action Plan (AAP);
- A Consolidated Annual Performance and Evaluation Report (CAPER); and
- An Assessment of Fair Housing (AFH)

As required by the Housing and Urban Development (HUD) Code of Federal Regulations (CFR) for the Consolidated Plan (24 CFR Part 91 Sec. 91.105), the City must adopt a Citizen Participation Plan (CPP) setting forth the City's policies and procedures for citizen participation. This CPP establishes standards for the City to provide for and encourage citizens and entitlement grant beneficiaries to participate in the planning, execution, and evaluation of the Con Plan, the AAPs, and the CAPERs.

In addition, HUD Final Regulations for the Assessment of Fair Housing (AFH) requires the City to adopt a Community Participation Plan (CoPP) setting forth the City's policies and procedures for the solicitation of views and recommendations from members of the community and other interested parties, consideration of the views and recommendations received, and incorporation of such views and recommendations into decisions and outcomes (24 CFR §5.152). Generally speaking, the CoPP policies and procedures mirror those of the CPP, with the addition of requirements regarding HUD-provided data and other supplemental information and required consultation with other public and private agencies.

This Citizen/Community Participation Plan (CPP/CoPP) serve to meet the federal requirements described above concurrently.

CORONAVIRUS PANDEMIC SPECIAL PROVISIONS

In response to the Coronavirus Pandemic (COVID-19), HUD has granted waivers for entitlement communities to amend Community Development Block Grant Citizen Participation Plans to expedite efforts to prevent and respond to the Coronavirus's impact on our community. These waivers include notice and reasonable opportunity to comment of no less than five days with in-person public hearings not required. During the effective period of HUD's public notice and comment waivers, the City will meet public hearing requirements by providing no less than 5 days notice of public hearings related to HUD-required plans and documents and conduct public hearings virtually if: 1) national, state or local health authorities recommend social distancing and limiting public gatherings for public health reasons; and 2) virtual hearings provide reasonable notification and access for citizens. The 5-day public notice and virtual hearing procedures shall take precedence over conflicting provisions the CPP/CoPP until such time as HUD withdraws or revises these procedural waivers. Accordingly, these waivers will only be in place during the Country's response to the Coronavirus.

OBJECTIVES

The primary goal of the Citizen Participation Plan (CPP) is to solicit views and recommendations from members of the community, organizations, and other interested parties and to incorporate the views and recommendations in the decision making process. To accomplish this goal, the CPP mandates that the City will:

- Encourage broad participation in the development and preparation of the Consolidated Plan, Annual Plan, AFH, substantial amendments to these plans, and the CAPER.
- Encourage involvement by low-moderate income persons, particularly those who reside in CDBG-targeted neighborhoods, people with disabilities, racial and ethnic minorities, non-English speaking and limited English proficient (LEP) persons, and residents of public and assisted housing developments in the development of the Consolidated Plan and AFH.
- Encourage participation from Continuums of Care, businesses, developers, nonprofit organizations, philanthropic organizations, community-based and faith based organizations, public housing agency consultations, resident advisory boards, resident councils, and resident management corporations during the development and implementation of the Consolidated Plan and AFH.
- Provide residents reasonable and timely access to information, meetings, and records.
- Provide residents the opportunity to review, offer input and feedback regarding the use of CDBG funds, and comment on the CAPER.
- Anticipate and provide for the needs of non-English-speaking and LEP persons.
- Employ comprehensive techniques to encourage and measure public participation and review program performance.

DEVELOPMENT OF THE CONSOLIDATED PLAN, ANNUAL PLANS, AND ASSESSMENTS OF FAIR HOUSING

- The City will make a concerted effort to notify residents, social service providers, business groups, nonprofit organizations, community and faith-based organizations, and community boards and other interested organizations of the development of the Consolidated, Annual Plans, and AFH through electronic mail, online postings, and notices in the newspaper.
- The City will issue a Notice of Funding Availability inviting proposals for CDBG activities. Upon request, the City will provide technical assistance to groups representing low-moderate income persons to develop proposals for eligible activities and comment on the AFH.
- The City will make available any HUD-provided data and other supplemental information the grantee plans to incorporate into its AFH at the start of the public participation process (or as soon as feasible after).
- Prior to adoption of the Plan(s), the City will make available the estimated amount of CDBG funding that it expects to receive, the activities that may be undertaken, the estimated amount of funds that will be used to benefit low-moderate income persons, and any activities that may result in displacement.
- The City will publish a summary of the proposed Plan(s) and/or AFH in the newspaper and have it available on the City's website for a period of ten days prior to a public meeting. The summary will describe the contents and purpose of the Plan(s) and/or AFH and include a list of the locations where they may be examined. The Plan(s) and/or AFH will

be available for review at City Hall, on the City's website and additional locations as necessary. The City will provide a reasonable number of free copies to citizens and groups upon request.

- As part of the AFH, the City will gather and analyze historical and existing fair housing conditions data that pertain to determining the goals required to affirmatively further fair housing that will be used in the development of the Consolidated Plan. The City shall make available to the public, residents, public agencies, and other interested parties any HUD-provided data and other supplemental information the City plans to incorporate into the AFH at the start of the public participation process (or as soon as feasible thereafter). The City may make the HUD-provided data available to the public by cross-referencing to the data on HUD's website.
- The City will consult with other public and private agencies that provide assisted housing, health services, and social services, including those persons with HIV/AIDS and their families, and homeless persons. In addition to community-based and regionally-based organizations that represent protected class members and organizations that enforce fair housing laws, when preparing the AFH, the City will also consult with public housing authorities (PHAs) operating in the region. The consultation process will include regional government agencies in addition to adjacent jurisdictions and the County of San Diego.

PUBLIC HEARINGS

- The City will conduct at least two public hearings each year to obtain residents' views regarding housing and community development needs, proposed allocation of CDBG funds, strategies and actions taken to affirmatively further fair housing, and review program performance.
- The City will conduct at least one public hearing during the development of the Consolidated Plan prior to publishing the Consolidated Plan for public comment.
- The City will receive and consider comments concerning the Plan(s) and/or AFH for period of not less than 30 days. All comments received, in writing or orally at a public meeting, will be considered in preparing the final Plan(s) and/or AFH. A summary of the comments or views, including those not accepted and the reasons, shall be attached to the final Plan(s) and/or AFH.
- Public notices will be published at least ten days prior to the hearing. Notices will include the date, time, location, and summary of the proposed action to help facilitate informed comment. Notices will be published in the newspaper and announced on the City's website.
- Public notices, excluding the CAPER, will be published at least ten days prior to a hearing. Notices will include the date, time, location, and summary of the proposed action to help facilitate informed comments. Notices will be published in the newspaper and announced on the City's website.

It has been the practice of the City to combine notices complying with several individual requirements into one document for dissemination and publication. The City is receptive to suggestions for ways to improve its process for notifying the public of hearing and the availability of draft documents for public review.

The City will consider comments and views expressed by residents, public agencies, and other interested parties either in writing or orally at public meetings. In each 5-Year ConPlan, AAP, CAPER, AFH, Substantial Amendment, or CPP/CoPP submitted to HUD, the City will provide as an attachment all written communications received and a summary of each oral comment during the applicable 30-day or 15-day public review period; the City's subsequent action; and the reasons

for non-action, if none was taken. This information will also be made available to the public as part of the final document.

AMENDMENTS TO THE CONSOLIDATED PLAN, ANNUAL PLANS, AND ASSESSMENTS OF FAIR HOUSING

The City will amend its approved Plan(s) whenever it makes one of the following decisions:

- To carry out an activity not previously described in the Annual Plan using funds covered by the Consolidated Plan, including program income.
- To substantially amend the purpose, scope, location, or beneficiaries of an activity.
- To substantially amend the allocation priorities or the method of distributing funds.

A substantial amendment is defined as the following:

- An addition, modification, or elimination of a Consolidated Plan goal;
- An addition of a new activity not previously identified in the Annual Plan; or
- A change in an activity after the adoption of the Annual Plan that meets one of the following thresholds:
 - a. A net increase or decrease greater than 50% of the activity allocation; or
 - b. A change in the use of funds from one activity to another that affects 20% or more of the City's current annual CDBG fund allocation.
- A change in an adopted AFH:
 - a. Resulting from a material change in circumstances in the City of Santee affecting the information on which the AFH was based to the extent that the analysis, the fair housing contributing factors, or the priorities and goals of the AFH no longer reflect actual circumstances (for instance, a significant change that impacts the City's ability to carry out the AFH, such as new significant contributing factors, civil rights findings, a substantial change in demographics used, a Presidentially-declared disaster, etc.); or
 - b. Resulting from a written notification provided by HUD identifying a material change that HUD believes warrants revisions to the AFH.; or
- Substantial amendments must be authorized by the City Council and will be available on the City's website and through public notices in the newspaper. Minor changes and/or corrections may be made, so long as the changes do not constitute a substantial amendment. Minor changes, including but not limited to modifications of goal outcome indicators, shall not be considered a substantial amendment and do not require public review or a public hearing.
- The City will receive and consider comments concerning substantial amendments and/or AFH revisions for period of not less than 30 days. All comments received, in writing or orally at a public meeting, will be considered in preparing the final Plan(s) and/or AFH. A summary of the comments or views, including those not accepted and the reasons, shall be attached to the final Plan(s) and/or AFH.
- Public notices will be published at least ten days prior to the hearing. Notices will include the date, time, location, and summary of the proposed action to help facilitate informed comments.

CONSOLIDATED ANNUAL PERFORMANCE AND EVALUATION REPORTS (CAPERS)

The City will prepare an annual CAPER to evaluate the progress of the Consolidated Plan and to review accomplishments for the previous program year.

- Prior to submitting the CAPER to HUD, the report must be submitted to the City Council for review. A public notice, advising of the availability of the CAPER, will be published in the newspaper and available on the City's website. The CAPER will be available for review at the Office of the City Clerk, on the City's website, and additional locations as necessary.
- A comment period of not less than 15-days will be provided. All comments received, in writing or orally, will be included in the final submission to HUD.

ACCESS TO INFORMATION AND RECORDS

- This Citizen Participation Plan, the Consolidated Plan, the current Annual Plan, the current AFH, the current CAPER, and any substantial amendments to these plans will be available for public review at the Office of the City Clerk, 10601 N. Magnolia Avenue, and on the City's website.
- Any citizen, organization, or other interested party may submit written requests for information regarding the Consolidated Plan, Annual Plans, AFH, and CAPER, including the City's use of funds under the CDBG programs and the benefit to low-moderate income residents during the preceding five years.

DISPLACEMENT POLICY

As part of the CPP/CoPP, the City must maintain a displacement policy. Displacement refers to the involuntary relocation of individuals from their residence due to housing development and rehabilitation paid for with federal funds. The City will continue to use existing federal and State relocation guidelines, as applicable, to minimize displacement and to alleviate the problems caused by displacement. Both the federal government and the State of California have specific requirements dictating the amount of benefits and assistance that must be provided to lower-income persons and households relocated from their homes as a result of displacement. Depending on the funding source, displaced persons may be offered one or more of the following:

- A rent subsidy for another unit
- A cash payment to be used for rent or a down payment on the purchase of a dwelling unit
- Moving and related expenses

TECHNICAL ASSISTANCE

The City will, to the extent practicable, respond to requests for technical assistance by groups representing persons of low and moderate income developing funding proposals for any program covered by the Con Plan in accordance with grant procedures. This may include, but is not limited to, providing information regarding how to fill out applications, other potential funding sources, and referrals to appropriate agencies within and outside the City. "Technical assistance," as used here, does not include the provision of funds to groups requesting such assistance.

Assistance will also be provided by the City's Development Services Department to interested individuals and citizens' groups who need further explanation on the background and intent of

the Housing and Community Development Act, interpretation of specific HUD regulations, and project eligibility criteria for federal grants.

COMMENTS/COMPLAINTS

The City will consider any comments from citizens received in writing or orally at public hearings in preparing this Citizen Participation Plan, the Consolidated Plan, Annual Plans, CAPERs, AFH, and/or substantial amendments to these plans. A summary of all comments will be attached and submitted to HUD.

The City will respond to written complaints received relating to the Consolidated Plan, Annual Plans, AFH, CAPERs, and/or substantial amendments. Written complaints must describe the objection and provide contact information of the complainant. The City will respond to complaints within 15 working days of receiving the written complaint, acknowledging the letter and identifying a plan of action, if necessary.