



City of Santa Barbara

CDBG and HOME Programs

Citizen Participation Plan



Revised April 2020

NOTICE

Citizen Participation Plan Updates

The Citizen Participation Plan (CPP) has been updated and is available for review at the City of Santa Barbara website at www.SantaBarbaraCA.gov. Under a waiver from the U. S. Department of Housing and Urban Development, the city is providing a 5-day review and comment notice from May 11 to May 16, 2020.

Revised to:

- Include virtual hearings as an allowed method for citizen participation;
- Update the types of declared disasters or emergency events to include terrorism and infectious diseases, such as the recent coronavirus 19 (COVID-19) pandemic, that may necessitate expedited substantial amendments;
- Includes provisions relative to citizen participation-requirement waivers made available under the Coronavirus Aid, Relief, and Economic Security (CARES) Act.

All changes are underlined.

Written comments concerning the Citizen Participation Plan may be submitted to: HHS@SantaBarbaraCA.gov no later than May 16, 2020.

CONTENTS

- Introduction and Purpose 1
- I. Definitions 2
- II. Roles and Responsibilities 4
- III. Citizen Participation Policies 6
 - Consolidated Plan/Annual AP and AI Development 6
 - Public Review 7
 - Consolidated Annual Performance Evaluation Report (CAPER)..... 8
- IV. Process for Amendment or Revision..... 9
 - Amendments for the ConPlan and Annual AP 9
 - Revising Analysis of Impediments to Fair Housing 10
 - Public Review Requirements for Amendments and Revisions 10
 - Amendments During Disaster/Emergency Events..... 11
- V. Accessibility..... 11
 - Persons with Limited English Proficiency 11
 - Persons with Disabilities..... 12
 - Public Housing or Low/Moderate Income Residents 12
- VI. Other Policies 13
 - Comments/Complaints on Adopted Plans..... 13
 - Displacement Policy 13
 - Technical Assistance..... 14
 - Access to Records 14

Introduction and Purpose

The City of Santa Barbara (City) is a recipient of federal entitlement grant funding from the U.S. Department of Housing and Urban Development (HUD) for the following programs:

- Community Development Block Grants (CDBG)
- HOME Investment Partnership Program (HOME)

As a recipient of these funds, the City is required to prepare a Consolidated Plan to assess the City's affordable housing and community development needs, and develop data-driven funding strategies and program goals. The Consolidated Plan is carried out through Annual Action Plans, which provide a summary of the specific activities, and resources that will be used each year to address the needs and goals identified by the Consolidated Plan. Accomplishments and progress toward meeting the City's goals are reported in the Consolidated Annual Performance and Evaluation Report. As part of the Consolidated Plan, the City is also required to conduct an Analysis of Impediments to Fair Housing to review laws, regulations, conditions and other possible obstacles, both public and private, which could affect an individual's access to housing in Santa Barbara.

Additionally, the City must adopt a Citizen Participation Plan (CPP) that sets forth the City's policies and procedures for citizen participation in the development of the Consolidated Plan and the other aforementioned HUD-mandated documents. The citizen participation process outlined in this plan was developed in accordance with the federal regulations of 24 CFR 91.105, and requires outreach, public hearings, community meetings, and opportunities for comment. The plan provides for citizen input and emphasizes participation by low- or moderate-income residents, particularly residents of predominantly low- and moderate-income neighborhoods, regional stakeholders and Continuums of Care, and residents of areas in which the City proposes to use CDBG funds. It also outlines the practicable procedures to handle complaints from residents regarding its Consolidated Plan and other HUD-mandated documents.

Ultimate responsibility and authority for final decisions regarding the Consolidated Plan and related documents resides with the Santa Barbara City Council. Nothing herein shall be construed to restrict the responsibility or authority of the City for the development and execution of its community development programs and execution of its Consolidated Plan.

The CPP shall be available to the public on the City website, and upon request, will be made in a format accessible to persons with disabilities. The City will review its CPP annually in conjunction with the development of the City's Annual Action Plan. If it's determined that the CPP needs to be updated or revised, the City will provide citizens with a reasonable opportunity to comment on proposed changes to the CPP in accordance with the Public Review requirements for the amendment of documents described further in this document.

I. Definitions

Annual Action Plan (Annual AP): The Annual AP outlines the activities that will be undertaken during the program year to meet the goals stated in the City's 5-year Consolidated Plan (defined below).

Affirmatively Furthering Fair Housing (AFFH): AFFH is a legal requirement for local governments that receive federal grants to further the purposes of the Fair Housing Act by undertaking actions that combat discrimination, overcome patterns of segregation, and foster inclusive communities free from barriers that restrict access to housing.

Analysis of Impediments to Fair Housing Choice (AI): A comprehensive review of a community's laws, administrative policies and practices, both public and private, and how they affect the location, availability, and accessibility of housing choice for various protected classes, e.g. race, color, religion, sex, disability, familial status, or national origin. The AI is required to be updated every five years in conjunction with the Consolidated Plan.

Citizen Participation Plan (CPP): The Citizen Participation Plan (CPP) outlines the procedures the City will undertake to ensure public involvement during the development of the City's Consolidated Plan and Annual Performance Report, and Analysis of Impediments to Fair Housing Choice.

Community Development Block Grant (CDBG): The CDBG program provides formula grants to communities to create viable urban communities by providing decent housing, suitable living environments and expanded economic opportunities, principally for low and moderate-income persons.

Consolidated Annual Performance Evaluation Report (CAPER): The CAPER provides to the federal government, Congress and the public with necessary information to assess the City's progress in meeting its CDBG and HOME program goals.

Department of Housing and Urban Development (HUD): HUD is the federal agency that oversees the CDBG and HOME programs, among various other programs. HUD's mission is to create strong, sustainable, inclusive communities and quality affordable homes for all.

Displacement: The relocation of individuals from their residences resulting from housing development and rehabilitation activities paid for by federal funds.

Eligible Activity: Activities that may be supported in whole or in part with CDBG or HOME funds as defined in the Code of Federal Regulations Title 24.

Entitlement Community: A metropolitan city or urban county entitled to receive a formula allocation of CDBG funds.

Five-Year Consolidated Plan (ConPlan): The ConPlan identifies the City's housing and community development needs and details the City's 5-year strategy and goals to address those needs with HUD-allocated funds.

HOME Investment Partnership Program (HOME): The HOME program provides formula grants to communities to support a wide range of activities including building, buying, and rehabilitating affordable housing for rent or homeownership, or providing direct rental assistance to low-income people.

Human Services Grant: General Funds made available by the Santa Barbara City Council to grant to local non-profit organizations that provide direct human services to low- and moderate-income City residents.

Low-and moderate-income: Households with income that do not exceed 80 percent of the Area Median Income (AMI) as defined by HUD.

II. Roles and Responsibilities

City Council: The Mayor and Councilmembers comprise the nonpartisan City Council. Six members serve a specific district within the City, and the Mayor is the sole member representing the entire City.

Under the City Charter, City Council's duties include: approval of the City budget and financial oversight of the City. The City Council has the power to adopt ordinances and resolutions, make appointments to advisory boards, establish policy and approve programs, act on recommendations of City staff, appropriate funds, approve contracts, and respond to concerns and needs of residents.

The City Council reviews and adopts the City's ConPlan, AI and Annual AP activities, and authorizes City staff to administer the programs.

City Administrator: The City Administrator reports directly to the City Council and provides for the management of all affairs of City government and services, as well as oversight of and direction of all City departments. The City Administrator is the City's representative authorized to sign the necessary documents that are required by HUD.

Community Development Department (CDD): The Community Development Department is responsible for planning, building and safety, and housing and human services. The day-to-day coordination and administration of the CDBG and HOME programs are conducted by CDD's Housing and Human Services Division staff. The administrative policies for the City's CDBG and HOME programs are outlined in two policy documents entitled *CDBG Policies and Administrative Manual* and *Affordable Housing Policies and Procedures*. Both documents can be found on the City website's Housing and Human Services section.

Community Development and Human Services Committee (CDHSC): The CDHSC provides continuity of citizen participation throughout all stages of the CDBG and Human Services programs. The role of the CDHSC is primarily to advise the City Council on how CDBG and Human Service grant funds should be allocated annually. The CDHSC evaluates all eligible grant requests and forwards its recommendations to Council. If approved by Council the applicable activities are incorporated into the City's Annual AP.

The CDHSC is also a source for citizens and citizen groups to use as a community forum for providing information to the City on community development needs. The CDHSC also assists staff in performance monitoring of grantees; assists Council and staff to assess funding priorities and goals during development of the ConPlan; and fosters integration, coordination and cooperation of human service providers in the City.

The CDHSC is designed to reflect, to the greatest possible extent, the diversity of the City and consists of the following membership categories:

- One representative from the African-American community.
- One representative from the Latino community.
- One representative from the business community/economic development community.
- One representative from human services organizations.
- One representative from youth-oriented service organizations.
- One representative from the senior community.
- One representative from homeless-related service organizations.
- One representative from each of the following four low- and moderate-income neighborhoods, as identified by HUD using US Census data:
 - Eastside
 - Westside/Lower Westside
 - Downtown Area
 - Oak Park
- One representative from the disabled community.
- One Representative from the Housing Authority of the City of Santa Barbara.

The CDHSC generally meets on the fourth Tuesday of the month at 6:00 p.m. at the Gebhard Public Meeting Room, 630 Garden St. Additional special meetings are held in January and February as part of the CDBG/Human Services funding cycle. All meetings are noticed in accordance with the Brown Act and are open to the public.

The complete policies and guidelines for the CDHSC are outlined in City Council Resolution 17-103 and in the Community Development and Human Services Committee Membership Guide. Both documents can be found on the City website's CDBG and Human Services section.

III. Citizen Participation Policies

Consolidated Plan/Annual AP and AI Development

The City shall encourage citizen participation in the development and execution of its Consolidated Plan for use of federal CDBG and HOME funds. The City shall take appropriate action to encourage the participation of all its citizens, including low- and moderate-income persons, residents of HUD-designated low- and moderate-income neighborhoods, minorities and non-English speaking persons, as well as persons with disabilities. Other identified groups include local and regional institutions, residents of public and assisted housing, Continuums of Care, other stakeholders (such as businesses, nonprofit organizations, and faith-based organizations), broadband internet service providers, organizations engaged in narrowing the digital divide, agencies whose primary responsibilities include the management of flood prone areas, public land or water resources, and emergency management agencies.

Public input shall be sought during the development of the City's 5-Year ConPlan and AI, to help identify priority needs and establish program goals and objectives for the duration of the ConPlan/AI period. As part of the ConPlan/AI development, the City shall conduct community meetings, host stakeholder focus groups, conduct community-needs surveys, hold a public comment period and host public hearings.

The City shall make available in draft reports and during public meetings, any HUD-provided data and any other supplemental information the City plans to incorporate into its ConPlan and AI, as well as the amount of CDBG/HOME assistance the City expects to receive during the 5-year period, and the range of activities that may be undertaken.

Public Review

Public Hearings: At least two public hearings will be held each year. One need-assessment public hearing will be held each September before the CDHSC during its regular meeting, seeking input on housing and community development needs, as part of the development of the ConPlan and AI (every five years), and Annual AP (each year). The second public hearing shall take place in March before the City Council prior to the commencement of the public review period of the ConPlan and AI (every five years), and Annual AP (each year). Virtual on-line public hearings may be held in-lieu of in-person hearings if national or local authorities enact social-distancing protocols, and/or limit public gatherings for public health reasons. Virtual meetings must be held in real-time where the public can address elected officials via telephone or webinar.

Council Approval: Required for ConPlan, Annual AP, and AI.

Public Review Period: Prior to adoption, the draft ConPlan, Annual AP, and AI will be made available for public review for at least 30 days, unless otherwise indicated by HUD, during which the City will accept written comments. A summary of the comments received, along with the City's response will be attached to the ConPlan, Annual AP, and AI submitted to HUD, which generally are due prior to May 15, unless otherwise noticed by HUD.

Availability: A summary shall be published in one, or more, newspapers of general circulation within 7 – 14 days prior to commencement of the review period. The summary shall describe the content and purpose of the ConPlan, Annual AP, and AI, and shall list the locations where the full Annual AP, and AI document may be viewed.

The Draft ConPlan, Annual AP, and AI shall be posted on the City's website home page, www.SantaBarbaraCA.gov, for the duration of the review period. Hard copies will be available at the following locations:

- Santa Barbara Central Library – 40 E. Anapamu St., Santa Barbara, Ca. 93101
- City Clerk's Office - 735 Anacapa St., Santa Barbara, Ca. 93101
- Community Development Office – 630 Garden St., Santa Barbara, Ca. 93101

Hard copies will not be available if City buildings are closed to the public due to a federally- or locally-declared emergency. During such an event, the reports shall be

available for public review electronically at www.SantaBarbaraCA.gov, or will be emailed upon request. A reasonable number of free copies of the aforementioned reports shall be available to residents and groups that request it. A PDF of the final ConPlan, Annual AP, and AI shall be available on the City website's CDBG and Human Services section.

Consolidated Annual Performance Evaluation Report (CAPER)

The City shall provide citizens with reasonable notice and an opportunity to comment the City's CAPER, which is due annually prior to September 28.

Public Hearing: One public hearing to review the City's performance report will be held each September before the CDHSC during its regular meeting.

Council Approval: Not required.

Public Review Period: Prior to submittal to HUD, the draft CAPER will be made available for public review for at least 15 days, unless otherwise indicated by HUD, during which the City will accept written comments. A summary of the comments received, along with the City's response will be attached to the CAPER submitted to HUD.

Availability: Notice of the draft CAPER public review period shall be published in one, or more, newspapers of general circulation, within 7 – 14 days prior to commencement of the review period, and shall list the locations where the full draft CAPER may be viewed.

The draft CAPER shall be posted on the City's website home page, www.SantaBarbaraCA.gov, for the duration of the public review period. Hard copies will be available at the following locations:

- Santa Barbara Central Library – 40 E. Anapamu St., Santa Barbara, Ca. 93101
- City Clerk's Office - 735 Anacapa St., Santa Barbara, Ca. 93101
- Community Development Office – 630 Garden St., Santa Barbara, Ca. 93101

Hard copies will not be available if City buildings are closed to the public due to a federally- or locally-declared emergency. During such an event, the CAPER shall be available for public review electronically at www.SantaBarbaraCA.gov, or will be emailed upon request. A reasonable number of free copies of the CAPER shall be available to

residents and groups that request it. A PDF of the final CAPER shall be available on the City website's CDBG and Human Services section.

IV. Process for Amendment or Revision

It is the City's goal to remain compliant with federal regulations, and to ensure engagement by City residents in the implementation of its CDBG and HOME programs. If it's determined that any of the documents described in this plan need to be amended or revised, the City will provide citizens with a reasonable opportunity to comment on proposed changes as described below.

Amendments for the ConPlan and Annual AP

Minor Amendments – Minor Amendments are any changes not meeting the definition of a substantial amendment, as described below. Minor amendments shall be made administratively, and shall be incorporated into the current ConPlan and/or Annual AP.

Minor amendments shall maintain the integrity of the ConPlan and/or Annual AP, and shall not include any changes in the City's funding priorities, while still providing staff the flexibility necessary to carry out the City's goals and objectives. Minor amendments will be reported to HUD in the City's CAPER.

Substantial Amendments - A substantial amendment is defined as any of the following conditions for activities greater than \$100,000 in CDBG or HOME funds:

- A change in the City's funding allocation priorities previously identified in the ConPlan.
- To carry out an activity not previously identified in the Annual AP, or the deletion of a previously-identified activity.
- To change the purpose, scope, location or beneficiaries of any activity identified in the Annual AP.

All substantial amendments will be reported to HUD after the public review period is complete.

Revising Analysis of Impediments to Fair Housing

The City's AI shall be amended in event of the following:

- A material change in circumstances occurs in the City that affects the information on which the existing AI is based to the extent that the analysis, fair housing contributing factors, or the priorities and goals of the City's AI no longer reflect actual circumstances.
- Upon HUD's written notification specifying a material change requiring revision.

A revised AI will be submitted to HUD within 12 months of the material change, or when required by HUD in a written notification.

Public Review Requirements for Amendments and Revisions

Public Hearing: A public hearing is not required for ConPlan/Annual AP amendments (substantial or minor), or AI revisions.

Council Approval: Required for ConPlan/Annual AP substantial amendments, or AI revisions. Minor amendments require Community Development and Human Services Committee approval.

Public Review Period: Prior to Council adoption, the ConPlan/Annual AP substantial amendments, or AI revisions will be made available for public review for at least 30 days.

Availability: Notice of the public review period shall be published in one, or more, newspapers of general circulation, within 7 – 14 days prior to commencement of the review period, and shall list the locations where the draft ConPlan/Annual AP substantial amendments, or AI revisions may be viewed.

The draft ConPlan/Annual AP substantial amendments, or AI revisions shall be posted on the City's website home page, for the duration of the public review period. Hard copies will be available at the following locations:

- Santa Barbara Central Library – 40 E. Anapamu St., Santa Barbara, Ca. 93101
- City Clerk’s Office - 735 Anacapa St., Santa Barbara, Ca. 93101
- Community Development Office – 630 Garden St., Santa Barbara, Ca. 93101

A reasonable number of free copies of the draft reports shall be available to residents and groups that request it. A PDF of the final adopted ConPlan/Annual AP, or AI shall be available on the City website’s CDBG and Human Services section.

Amendments During Disaster/Emergency Events

It may be necessary to make expedited amendments to the ConPlan and/or Annual AP in the event of a declared disaster or emergency. There are three types of disasters/emergency events identified by HUD that may necessitate an expedited substantial amendment process including, (1) Man-Made-disasters, (2) Natural disasters, and (3) Terrorism. Man-made disasters can include, but are not limited to, chemical spills, mass rioting, power outages, plant explosions, etc. Natural disasters can include, but are not limited to, earthquakes, tsunamis, wild fires, flooding and public health concerns, such as wide-spread disease including the recent coronavirus disease 2019 (COVID-19). Terrorism events include, but are not limited to, bomb threats, biochemical attacks, cyber-attacks, phishing, and virus distribution, etc.

Such expedited amendments may include funding new activities, and/or reprogramming funds, and/or canceling existing activities to meet the needs resulting from a declared disaster or emergency. Therefore, the City may make substantial amendments to its FY 2019-20 and FY 2020-21 CDBG and HOME programs with a 5-day public review/comment period instead of the normal 30-day period. Any substantial amendments shall be available for public review electronically at www.SantaBarbaraCA.gov, or will be emailed upon request. Hard copies will not be available if City buildings are closed to the public due to an emergency.

V. Accessibility

Persons with Limited English Proficiency

According to US Census population estimates, 35% of City residents speak a language other than English at home. In addition, at 37% of the City’s population, the

Hispanic/Latino population makes up the City's second highest racial/ethnic group after non-Hispanic Caucasians, with all other combined groups comprising just 6% of the population. Therefore it is reasonable to expect that the City may need to provide accommodations to ensure citizen participation from the City's Spanish-speaking population.

To accommodate non-English speakers, community-needs surveys will be available in Spanish and translators will be available in public meetings and workshops. Public notices will specify that information will be available in Spanish, if needed.

Persons with Disabilities

The City of Santa Barbara will generally, upon request, provide appropriate aids and services leading to effective communication for people with disabilities so they can communicate with the City and participate equally in the City of Santa Barbara's programs, services, and activities.

Such aids and services include providing qualified professional sign language interpreters, documents in Braille, large print or audio recording, making and accepting calls through the Deaf and Disabled Telecommunications Program (DDTP)/ California Relay Service ("7-1-1"), and other ways of making information and communications accessible to people who have speech, hearing, or vision impairments.

If possible, notification at least 48 hours prior to the meeting will usually enable the City to make reasonable arrangements. Specialized services, such as sign language interpretation or documents in Braille, may require additional lead time to arrange.

In addition, the City's ConPlan/Annual AP, or AI will be formatted so they are friendly with screen reading software.

All public meetings will be held at locations accessible for persons with disabilities.

Public Housing or Low/Moderate Income Residents

To ensure participation of public housing or low- and moderate-income residents, the City will require membership of representatives of these communities in the Community Development and Human Services Committee.

The City will also consult with the HACSB in the development of its ConPlan and Annual AP, and will include the HACSB in the public-noticing activities identified in this plan to encourage the participation of residents of public housing. In addition, the City will partner with the Housing Authority to develop a joint AI.

VI. Other Policies

Comments/Complaints on Adopted Plans

Comments or complaints from residents, public agencies, and other stakeholders regarding the adopted Consolidated Plan or related amendments and performance reports may be submitted in writing to City of Santa Barbara, Community Development Department, Housing and Human Services Division, PO Box 1990, Santa Barbara, Ca. 93102-1990. Written comments or complaints will be referred to appropriate City staff for consideration and response. The City will attempt to respond to all comments or complaints within 15 business days and maintain a correspondence file for this purpose.

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 take all reasonable steps to minimize the displacement of persons as a result of CDBG or HOME-funded activities. A displaced person shall be provided with relocation assistance at the levels described in, and in accordance with, the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 or Section 104(d) of the Housing and Community Development Act of 1974.

Displaced persons may be offered one or more of the following:

- Moving and related expenses
- Security deposits and credit checks
- Interim living costs
- Replacement housing assistance

Technical Assistance

The City will, to the extent feasible, respond to requests for technical assistance from entities representing low- and moderate-income groups who are seeking federal funding in accordance with grant procedures. This may include, but is not limited to, providing information regarding how to fill out applications, identification of other potential funding sources, and referrals to appropriate agencies within the City. Technical assistance does not include the provision of funds to the entities requesting technical assistance.

Access to Records

The City will provide City residents, public agencies, or other interested parties with reasonable and timely access to information and records relating to the City's ConPlan, Annual AP, and AI of the preceding 5 years.

###