



# VII

## Citizen

# Participation Plan

The Citizen Participation plan has been prepared pursuant to federal regulations and the City's desire to encourage and support public participation in the development of the Consolidated Plan (and subsequent annual updates to the Consolidated Plan), and to comply with 24 CFR 570.704 (A) (2) (i.e., CDBG Section 108 Guaranteed Loan Funds) Citizen Participation Plan regulations. The actions delineated in this Citizen Participation Plan only relate to the planning and expenditure of funds provided to the City by the U.S. Department of Housing and Urban Development's (HUD) Office of Community Planning and Development (CPD). CPD entitlement funds received by the City include the Community Development Block Grant (CDBG) and Section 108 Loan proceeds, Home Investment Partnership (HOME), Emergency Shelter Grant (ESG) and Housing Opportunities for People with AIDS (HOPWA). Citizen representation and input has been, and will continue to be a major element in the decision-making process culminating in the adoption of the Consolidated Plan, related annual objectives, and potential Section 108 Loan applications.

## **APPLICABILITY AND ADOPTION OF THE CITIZEN PARTICIPATION PLAN**

As required by HUD, this Citizen Participation Plan has been developed to ensure Santa Ana residents participate in the development of a strategy to meet the housing and community needs of the City, and the utilization of federal CPD entitlement funds to meet these needs. Citizen involvement will be encouraged in the development of the Consolidated Plan and annual updates to the Consolidated Plan. The Citizen Participation Plan will also affect the process by which community stakeholders are included in the assessment of program performance and substantial amendments to the Consolidated Plan.

The City will ensure citizen participation through the use of community wide notices in the form of newspaper advertisements announcing public workshops, meetings, and/or public hearings. From time to time other methods of communication may be utilized to encourage citizen participation. These methods may include the use of surveys, special mailings and the utilization of video/electronic communication (e.g., cable T.V. notices and City's web page, etc.).

Authorization to submit the Consolidated Plan to HUD by the Santa Ana City Council will constitute the adoption of this Citizen Participation plan.

## **ENCOURAGEMENT OF CITIZEN PARTICIPATION**

Santa Ana's Citizen Participation process will place an emphasis on involving persons of low- and moderate-income, minorities, non-English speaking persons, persons with disabilities, recipients of Section 8 Housing Rental Assistance, and the agencies whose programs focus on the needs of these people



(including the Santa Ana Housing Authority). The following elements of the City's Citizen Participation Plan are designed to ensure Santa Ana resident involvement and representation in the Consolidated Plan process.

1. Citizen participation is open to any person wishing to attend any of the meetings, hearings, and/or workshops sponsored by the City regarding HUD CPD programs.
2. Public hearings will be held before the City of Santa Ana Redevelopment and Housing Commission to obtain public comments at various stages of Plan preparation and adoption. The comments received during the hearings will help the City determine housing and community needs and priorities, and the use of HUD CPD funds.
3. In addition to individual citizen participation, the following committees will be utilized by the City:
  - **CDBG** - An ad hoc committee may be empanelled for the purpose of reviewing applications for CDBG public service funding. The composition of the committee may vary from year to year; however, in general it may include representative from City commissions, non-profit organizations, other government agencies, and City staff. The priority needs identified in the City's Consolidated Plan will provide guidance for funding recommendations. If practical, the ad hoc committee may interview grant applicants. The ad hoc committee's funding recommendations will be presented at a public hearing; however, final funding recommendations will be approved by the City Council.
  - **HOPWA** - The Orange County HIV Planning Council will provide input on countywide priority needs of persons with HIV/AIDS, and the utilization of HOPWA funds. The Redevelopment and Housing Commission will review and endorse these HOPWA-funded activities during a public hearing. Funding recommendations will be approved by the City Council.
  - **ESG** - The same or similar ad hoc committee empanelled to review CDBG public services funding requests may also be used to evaluate ESG grant applications. Priority needs identified in the Consolidated Plan's Homeless

Needs Assessment will provide guidance for funding recommendations. If practical, the committee may interview applicants prior to rating applicants. The ad hoc committee's funding recommendations will be presented at a public hearing; however, final funding recommendations will be approved by City Council.

- **HOME** - The Redevelopment and Housing Commission will review and recommend HOME-funded activities during a public hearing. Final HOME-funded activities will be approved by the City Council.
4. Citizen participation will be encouraged via neighborhood and community wide public meetings and public hearings.

As stated above, the Housing Authority of the City of Santa Ana will be involved in the consolidated plan process for the City. The Housing Authority will have access to information on eligible programs, and areas where assisted units are located. Housing Authority participation is aimed to ensure continuity between the Consolidated Plan and the Housing Authority's HUD-required 5-year Agency Plan.

### **CITIZEN COMMENTS ON THE DEVELOPMENT OF THE CITIZEN PARTICIPATION PLAN AND AMENDMENTS TO THE CITIZEN PARTICIPATION PLAN**

Citizens will be given no less than 30 days to submit comments regarding the development of the Citizen Participation Plan (and/or substantial amendments to the Citizen Participation Plan) prior to the submission of the Plan to HUD. The Citizen Participation Plan, and any amendments, will be available to the public for review at:

- Santa Ana Main Library
- Office of the Clerk of the Council
- Community Development Agency, 6<sup>th</sup> Floor Reception Area
- Housing Division Office, 3<sup>rd</sup> Floor Reception Area
- City of Santa Ana Website

These locations are accessible to persons with physical disabilities; however, if a physical disability would limit a person's ability to review the plan at one of the locations listed above, upon request, the City will make a reasonable effort to make the plan (and amendments) available in an appropriate format.

## **DEVELOPMENT OF THE CONSOLIDATED PLAN**

Before the Consolidated Plan (and annual updates) is adopted by the City Council and submitted to HUD (i.e., mid-May), the City will make the plan available to citizens, public agencies, and other

interested parties for review, and will also establish the means to submit comments. Information made accessible to the public will include the amount of CPD grant funds the City expects to receive (including program income), the range of activities to be undertaken, and the anticipated number of low- and moderate-income persons to



benefit from funded activities. Information will also include the steps the City will take to eliminate the need for displacement of persons. If displacement will occur due to any planned actions, the City will comply with the requirements of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended (and implementing regulations in 49 CFR part 24).

The City will publish its proposed Consolidated Plan (and annual updates) so that all affected residents will have sufficient opportunity to review and comment on the plan. A summary describing the contents and purpose of the Consolidated Plan will be published in one or more newspapers of general circulation. To the extent

feasible, the draft document will be posted on the City's website. Additionally, the entire proposed plan will be made available for review at the following locations:

- Santa Ana Main Library
- Office of the Clerk of the Council – Santa Ana City Hall
- Community Development Agency, 6<sup>th</sup> Floor Reception Area – Santa Ana City Hall
- Housing Division Office, 3<sup>rd</sup> Floor Reception Area – Santa Ana City Hall

A reasonable number of free copies will be available at the Community Development Agency 6<sup>th</sup> Floor and Housing Division 3<sup>rd</sup> Floor locations.

During the development of the Consolidated Plan (and annual updates) there will be at least one public hearing to obtain comments from persons affected by the use of CPD funds, other community stakeholders, and interested parties. Additionally, as required by program regulations, there will be a 30-day public comment period prior to the submission of the Consolidated Plan to HUD. The City will consider all comments received from residents, public agencies and other interested parties as it prepares the final Consolidated Plan (and annual updates). A summary of public comments will be included with the final submission. The summary of public comments will include a synopsis of the City's response to written public comments, and an explanation of public comments not accepted, including the reasons why these comments were not accepted.

### **AMENDMENTS TO THE CONSOLIDATED PLAN**

The City will amend the Consolidated Plan and subsequent annual plan whenever one or more of the following decisions is made.

1. A change is made in the original relative priority designation of a housing or community need, or in the purpose, scope, location or beneficiaries of an approved activity.

2. Undertake an activity that was not previously included in the Consolidated Plan or subsequent annual plans.

If the City undertakes a **substantial amendment** to the Consolidated Plan (or subsequent annual plans), Santa Ana residents and stakeholders will have reasonable notice and opportunity to comment on the proposed amendment. The following criteria will be utilized to determine if a substantial amendment to the Consolidated Plan (or subsequent annual plans) is proposed, and is subject to a public hearing and 30-day public comment period:

1. Changes in the use of CDBG funds from one eligible activity to another.
2. More than 30% of an annual federal grant allocation is reallocated to other eligible program activities.

The City will publish proposed amendments to the Consolidated Plan and/or annual update so that all affected residents and interested parties will have sufficient opportunity to review and comment on the amendment. A summary describing the purpose of the amendment will be published in one or more newspapers of general circulation. A reasonable number of free copies will be available upon request. Additionally, a copy of the proposed amendment will be made available for review at the following locations:

- Santa Ana Main Library
- Office of the Clerk of the Council
- Community Development Agency, 6<sup>th</sup> Floor Reception Area
- Housing Division Office, 3<sup>rd</sup> Floor Reception Area

A public hearing to obtain comments from persons affected by the use of CPD funds, and other interested parties will be held. There will be a 30-day public comment period prior to the submission of the amendment to HUD. The City will consider all comments received from residents, public agencies and other interested parties regarding the amendment prior to HUD submittal. A summary of public

comments will be included with the final submission. The summary of public comments will include a synopsis of the City's response to written public comments, and an explanation of public comments not accepted, including the reasons why these comments were not accepted.

## **PERFORMANCE REPORTS**

The City is required to submit a consolidated annual performance report for its CPD programs to HUD no later than 90 days from the end of a program year (i.e. late-September). This performance report is known as the Consolidated Annual Performance and Evaluation Report (CAPER). Prior to submitting the CAPER to HUD, the City will solicit and consider the comments of residents, public agencies, and other interested parties.

The City will publish a notice that its CAPER is available for review so the public will have sufficient opportunity to review and comment on the report. The notice will be published in one or more newspapers of general circulation. There will be a 15-day public comment period prior to the submission of the CAPER to HUD.

A reasonable number of free copies of the CAPER will be made available for review at the following locations:

- Santa Ana Main Library
- Office of the Clerk of the Council
- Community Development Agency, 6<sup>th</sup> Floor Reception Area
- Housing Division Office, 3<sup>rd</sup> Floor Reception Area

A public hearing to obtain comments will be held by the Redevelopment and Housing Commission, with the City Council authorizing the submission to HUD. The City will consider all comments received from residents, public agencies and other interested parties. A summary of public comments will be included with the final submission. The summary of public comments will include a synopsis of the City's

response to written public comments, and an explanation of public comments not accepted, including the reasons why these comments were not accepted.

## **PUBLIC HEARINGS**

So that a full range of public comments and ideas are brought to bear during the development of proposed activities and program performance, at least two public hearings will be held each year. Meetings will be conveniently timed and held at locations where people who might or will benefit from program funding may attend.

The purpose of public hearings is to obtain the views of residents, public agencies and other interested parties, and to provide a forum to respond to comments. Public hearings will be held during two different stages of the consolidated submission process.<sup>53</sup> Specifically, public hearings will be held to:

1. Address housing and community needs and review the proposed use of funds.  
This meeting will be held prior to the publishing of the final Consolidated Plan (and annual plans) for public comments.
2. Review program performance.

Rules for all public hearings include the following:

1. Notice of each hearing will be made at least 14 days in advance, and will be published in a local newspaper of general circulation. All notices will be of a size and type to draw the attention of casual newspaper readers and will state the time, date, location and topics to be discussed.
2. Where a significant number of non-English speaking residents can be reasonably expected to participate, translators will be available.
3. These meetings will be held at locations that are accessible to persons with disabilities.

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<sup>53</sup> In addition, for the CDBG program one or more public meetings may be scheduled. Public meetings will be held to receive testimony on public service programs and budgets proposed for the program year.

## **MEETINGS**

Adequate and timely notification to allow citizens an opportunity to attend and participate in making recommendations at local meetings, community workshops, and public hearings, will be provided by way of newspaper notices, special mailings, posted notices, the City's web site, and other forms of communication.

## **AVAILABILITY OF INFORMATION TO THE PUBLIC**

As previously stated, the City will publish an announcement as to the availability of its proposed Consolidated Plan (and annual updates), amendments, and performance reports, so that affected residents and other interested parties have sufficient opportunity to review documents and provide comments. A summary describing the contents and purpose of the Consolidated Plan, amendments, and performance report will be published in one or more newspapers of general circulation. In addition, a sufficient number of free copies of the entire proposed plan, amendments, and performance reports will be made available for review at the following locations:

- Santa Ana Main Library
- Office of the Clerk of the Council
- Community Development Agency, 6<sup>th</sup> Floor Reception Area
- Housing Division Office, 3<sup>rd</sup> Floor Reception Area

Upon request (and within reason), the plan will be made available to persons with disabilities.

## **ACCESS TO RECORDS**

The City will provide access to information and records relating to the Consolidated Plan to residents, public agencies, and other interested parties. The City's use of assistance for programs covered under the plan for the preceding five years will also be available.

Requests for information and records must be made in writing to the Community Development Agency. The written request must delineate the specific information that is being requested. Community Development staff will have 15-working days to respond to these requests.

## **TECHNICAL ASSISTANCE**

The City will provide technical assistance to groups representing low- and moderate-income persons that request help in developing proposals for funding under programs covered by the Consolidated Plan. The City will determine the type and level of assistance that City staff will be able to provide for each group. Assistance does **not** include nor assure the provision of funds.

## **COMPLAINTS**

Written complaints regarding the preparation of the Consolidated Plan (and annual updates), amendments and/or performance reports must be submitted to the City's Community Development Agency – 20 Civic Center Plaza, 6<sup>th</sup> Floor, Santa Ana CA 92701. The City will provide a written response to complaints within 15-working days from the date the complaint is received.

## **USE OF CITIZEN PARTICIPATION PLAN**

The City will comply with the process and policies established in the City Council-adopted Citizen Participation Plan when operating programs covered by the Consolidated Plan. Amendments to the Citizen Participation Plan will be subject to the substantial amendment requirements outlined in this document.

## **JURISDICTION'S RESPONSIBILITY**

The requirements for the Citizen Participation Plan will not restrict the responsibility or authority of the City in the development and execution of the Consolidated Plan.

## **SECTION 108 LOAN PROGRAM CITIZEN PARTICIPATION PLAN**

The City of Santa Ana has developed this citizen participation plan, which will be applicable only if the City applies for the CDBG Section 108 Guaranteed Loan Funds.

HUD regulations state that the Section 108 Loan Citizen Participation Plan may be incorporated into the City's existing citizen participation plan for the Consolidated Plan provided that it complies with the requirements delineated in 24 CFR 570.704 (A) (2). Note that HUD regulations state that the City is not required to hold a separate public hearing for its Consolidated Plan and for the Section 108 Loan process to obtain citizens' views on community development and housing needs. To the extent that it is feasible, it is the City's intent to combine these two process as allowed by federal regulations.

This Section 108 Loan Citizen Participation Plan sets forth the following policies and procedures to ensure Santa Ana residents and stakeholders are provided an opportunity to provide comments on actions related to a potential Section 108 Loan application and use of such funds:

- **Notices and Meetings** - Santa Ana residents and stakeholders will be provided timely notice of local meetings and reasonable and timely access to local meetings, information, and records relating to the City's proposed and actual use of guaranteed loan funds. The means that will be utilized to provide notices will be same as outlined previously in the Citizen Participation Plan. Information that will be provided include, but is not limited to:
  - The amount of guaranteed loan funds expected to be made available as a result of an application for Section 108 Loan funds, including program income anticipated to be generated by the activities carried out with guaranteed loan funds;
  - A list of the range of activities that may be undertaken with guaranteed loan funds;
  - The estimated amount of guaranteed loan funds (including program income derived therefrom) proposed to be used for activities that will benefit low- and moderate-income persons;
  - The proposed activities likely to result in displacement and the City's plans, consistent with the policies developed under § 570.606, for minimizing displacement of persons as a result of its proposed activities.

**Technical Assistance** - The City will provide technical assistance to groups representative of persons of Low- and Moderate-income that request assistance in developing proposals for the use of Section 108 Loan funds. The level and type of assistance to be provided is outlined in the Citizen Participation Plan. This technical assistance need does not include the provision of funds to such groups.

**Public Hearings** - The City will hold at least two public hearings at a different stage of the application process. Public hearings will be held by the Santa Ana City Council.

- One public hearing will be held for the purpose of obtaining the views of citizens regarding a proposed application for Section 108 Loan funds.

- A second public hearing will be held to formulate or respond to proposals and questions.
- Together the hearings will address community development and housing needs, development of proposed activities and review of program performance as they relate to the receipt and use of Section 108 Loan funds.
- At least one hearing will be held before submission of the application to obtain the views of citizens on community development and housing needs as they relate to the application for Section 108 Loan funds.
- Reasonable notice of the hearing will be provided and the hearing will be held at times and locations convenient to potential or actual beneficiaries, with accommodation for the handicapped. The means that will be utilized to notify interested parties of hearing times, locations and potential beneficiaries will be same as outlined previously in the Citizen Participation Plan.
- Language translation services will be provided at meetings, such as public hearings, where a significant number of non-English speaking residents may reasonably be expected to participate.

**Substantial Amendments** - The City will provide affected residents with reasonable advance notice of, and opportunity to comment on, proposed activities not previously included in a Section 108 Loan application and activities which are proposed to be deleted or substantially changed in terms of purpose, scope, location, or beneficiaries. For the purpose of the Section 108 Guarantee Loan program, the City has determined that following situation(s) will constitute(s) a **substantial change** thus triggering the requirement for a public hearing and 30-day public comment period:

- Changes in the use of Section 108 Loan funds from one proposed eligible type of activity to another that was not identified in the Section 108 Loan application to HUD.
- More than 30% of the Section 108 Loan Fund awarded to the City is reallocated to one or more eligible activities.

**Complaints and Grievances** - The City will respond to citizens' complaints and grievances. Procedures for addressing complaints will be the same as outlined previously in the Citizen Participation Plan.

The City will encourage citizen participation, particularly by low- and moderate-income persons who reside in slum or blighted areas, and other areas in which guaranteed loan funds are proposed to be used.

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