



## Legislation Details (With Text)

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<b>Type:</b>	Staff Report	<b>Status:</b>	Public Hearing
<b>File created:</b>	5/7/2020	<b>In control:</b>	Special City Council
<b>On agenda:</b>	5/15/2020	<b>Final action:</b>	
<b>Title:</b>	Report regarding public hearing to hear public comments on Citizen Participation Plan for the Community Development Block Grant Program and resolution authorizing the submission of the plan. (Kris Romasanta, Community Development Coordinator)		
<b>Sponsors:</b>	Economic & Community Development		
<b>Indexes:</b>			
<b>Code sections:</b>			
<b>Attachments:</b>	1. Amended CCP City Council Presentation.pdf		

Date	Ver.	Action By	Action	Result
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Report regarding public hearing to hear public comments on Citizen Participation Plan for the Community Development Block Grant Program and resolution authorizing the submission of the plan. *(Kris Romasanta, Community Development Coordinator)*

### **RECOMMENDATION**

**Staff recommends that the City Council hold a public hearing to receive public comment on amending the Citizen Participation Plan (CPP) for the City's Community Development Block Grant (CDBG) program to include language that allows the City to conduct modified public participation processes due to extenuating circumstances, such as a state of emergency. Staff also recommends adopting a resolution adopting the plan and authorizing the City Manager to execute any necessary documents for the submittal to the U.S. Department of Housing and Urban Development.**

### **BACKGROUND/DISCUSSION**

Pursuant to Title 24, Code Federal Regulations, Part 91.105, the U.S. Department of Housing and Urban Development (HUD) requires entitlement cities, like the City of South San Francisco to adopt a Citizen Participation Plan (CPP) and amend the plan when there are changes to federal and local policies.

The purpose of the CPP is to set forth policies and procedures for citizen participation in the development of the Consolidated Plan and Annual Action Plan, any substantial amendments to these plans and the preparation of the Consolidated Annual Performance and Evaluation Report (CAPER), and the Assessment of Fair Housing (AFH). The CPP outlines how the City will provide the following:

- Adequate notice for public hearings;
- The format of the notification;
- The location of public hearings; and
- Information on accessing the public hearing.

A major element of the CPP is that it must encourage citizen participation, especially by low- and moderate-income persons, particularly those living in areas designated by the City as CDBG service areas.

According to the City's CPP, any substantial changes to an existing policy document requires a 15-day public notice and comment period. The City's CPP does not address amendments under extenuating circumstances, such as a state of emergency, or the use of virtual meetings or other types of meeting arrangements established by the City.

On April 6, 2020, HUD granted the City a waiver shortening the comment period for public hearings from 30 days to 5 days and allowing virtual meetings to occur without following existing CPP requirements. Based on these updates, staff expedited the public hearings for the Substantial Amendments of the 2018-2023 Consolidated Plan and the 2019 Annual Action Plan, with the intent to amend the Citizen Participation Plan at a later date.

Recent guidance from HUD, however, stated that the City must amend the Citizen's Participation Plan to reflect changes in the public process before the Substantial Amendments can be reviewed and accepted by HUD. To comply with this guidance, the City is holding this public hearing to take public comments on the proposed amendments to the CPP.

### **Proposed CPP Amendments**

The economic impact of the Shelter-in-Place order caused by COVID-19 has had a crippling effect on the local community and the standard public comment period would delay those most in need from receiving financial assistance. Under these circumstances, staff has prepared a Resolution amending the CPP to allow:

- 1) A public review period of a minimum of 5 days;
- 2) The City to hold virtual meetings, and
- 3) Electronic notification regarding public hearings, including emailing an interested persons list and posting the notice on the City's website.

### **FISCAL IMPACT**

There is no fiscal impact to conduct this public hearing.

### **CONCLUSION**

Staff recommends that the City Council hold a public hearing to receive public comment on amending the Citizen Participation Plan (CPP) for the City's Community Development Block Grant (CDBG) program to include language that allows the City to conduct modified public participation processes due to extenuating circumstances, such as a state of emergency. Staff also recommends adopting a resolution adopting the plan and authorizing the City Manager to execute any necessary documents for the submittal to the U.S. Department of Housing and Urban Development.

### **Attachments:**

1. Amended CCP City Council Meeting Presentation