



SONOMA COUNTY

CITIZEN PARTICIPATION PLAN

June 2020

Purpose of the Citizen Participation Plan

Pursuant to the U.S. Department of Housing and Urban Development (HUD) regulations set forth in 24 CFR Part 91, jurisdictions receiving housing and community development funds under the Community Development Block Grant (CDBG), HOME Investment Partnerships (HOME) and Emergency Solutions Grants (ESG) programs must prepare a Consolidated Plan and Assessment of Fair Housing (AFH)/Analysis of Impediments to Fair Housing (AI). The Consolidated Plan is designed to help local jurisdictions assess their affordable housing and community development needs and market conditions, and make data-driven, place-based investment decisions. The consolidated planning process serves as the framework for a community-wide dialogue to identify housing and community development priorities that align and focus the use of CDBG, HOME, and ESG funds from HUD. The Consolidated Plan includes Annual Action Plans, which provide a concise summary of the actions, activities, and the specific federal and non-federal resources that will be used each year to address the priority needs and specific goals identified by the Consolidated Plan. Grantees report on accomplishments and progress toward Consolidated Plan goals in the Consolidated Annual Performance and Evaluation Report (CAPER). The AFH/AI enables the County to identify fair housing issues and related contributing factors to achieve comprehensive community development goals and affirmatively further fair housing. Both the Plan and the AFH/AI must include a strategy for resident participation in the planning process.

Jurisdictions receiving housing and community development funds under the CDBG, HOME and ESG programs are further required to adopt and follow a Citizen Participation Plan. The purpose of the Citizen Participation Plan is to provide a written policy and procedure document that describes the actions to be taken to provide for, and to encourage, citizen participation in the development of the AFH/AI, Consolidated Plan and Annual Action Plans, any substantial amendments to an adopted Consolidated Plan, and the annual performance report. This June 2020 Citizen Participation Plan amends Sonoma County's May 2018 Citizen Participation Plan to:

1. Make reference to the reduced public comment period and reasonable notice and opportunity to comment allowed by HUD because of the nationwide COVID-19 emergency pursuant to Sec. 501(b) of Stafford Act declared by President Trump on March 13, 2020. Given the need to expedite actions to respond to COVID-19, HUD has waived 24 CFR 91.105(c)(2) and (k), 91.115(c)(2) and (i) in order to balance the need to respond quickly to the growing spread and effects of COVID-19 with the statutory requirement to provide reasonable notice and opportunity for citizens to comment on substantial amendments to the Consolidated Plan and/or Annual Action Plans concerning the proposed uses of CDBG, HOME, or ESG funds.
2. Make reference to the Governor's Executive Order N-29-20 which waives certain Brown Act Requirements in relation to public meeting spaces and accessibility in the midst of the COVID-19 emergency.

Access to Meetings, Information, Records

To ensure that citizens, public agencies, and other interested parties have the opportunity to review and comment, the public will be provided with reasonable and timely access to meetings, information and records relating to proposed activities, the proposed use of CDBG, HOME, and ESG funds, and the County's use of CDBG, HOME and ESG assistance during the preceding 5-year period. The Community Development Committee, appointed by the Sonoma County Board of Supervisors as their advisory body for community development activities, regularly meets on the third Wednesday of each month at 10:00 a.m. and will hold special meetings as needed. The meetings are held at the Community Development Commission office, 1440 Guerneville Road, Santa Rosa, CA. All members of the public are invited to attend the Committee's meetings to listen to and comment on any of the items on the Committee's meeting agenda. In addition, the Committee's regular agenda includes a time for the public to make comments on any other community development issues that are not on the meeting agenda. All meetings are noticed as described below and are conducted in accordance with the State of California Ralph M. Brown Act.

The State of California Governor's Office issued Executive Order N-29-20 which waives certain Brown Act requirements on holding meetings in public spaces, and allows local legislative bodies to hold public meetings telephonically or otherwise electronically to all members of the public seeking to observe and address the legislative body. As such, Commission hearings and meetings to discuss public business will be held virtually formats and not require anyone to gather in a physical meeting space to prevent the

spread of COVID-19. This provision will remain in effect until otherwise lifted by the Governor's Office.

Technical Assistance

The Commission will provide technical assistance to any persons or groups interested in developing CDBG, HOME or ESG funding proposals, including groups that are representative of low- and moderate-income persons. Such assistance will include at least one annual applicant workshop, in-person or via webinar, where Commission staff will provide information and assistance on funding applications. Additional technical assistance will be available by individual appointments with Commission staff.

Public Notices

Citizens are encouraged to participate in the development of the Assessment of Fair Housing/Analysis of Impediments to Fair Housing, Consolidated Plan and Annual Action Plans, any substantial amendments to an adopted Plan, and the annual performance report. Special efforts will be made to encourage participation by persons of low- and moderate-income, particularly those who are: (1) residents of slum and blighted areas, (2) residents of areas in which community development funds are proposed to be used, (3) residents of predominantly low- and moderate-income neighborhoods, (4) residents of any designated neighborhood revitalization areas, (5) minorities, (6) non-English speaking persons, and (7) persons with disabilities. The Commission will also encourage participation of local and regional institutions, the Continuum of Care, and other organizations, including businesses, developers, nonprofit organizations, philanthropic organizations, and community- and faith-based organizations in the process of developing and implementing the AFH/AI, Consolidated Plan and Annual Action Plans, any substantial amendments to an adopted Consolidated Plan and the annual performance report. Also, in consultation with the Sonoma County Housing Authority (SCHA), the Commission will encourage the participation of residents who are participants in the SCHA's rental assistance programs. Furthermore, the Commission will provide information to the SCHA about consolidated plan activities related to housing that is assisted by the SCHA in its area of operation so that the SCHA can make this information available at the annual public hearing required for the Public Housing Agency Plan.

To encourage the participation of low- and moderate-income citizens, the Commission will make radio public service announcements and distribute flyers announcing (1) public hearings and other public meetings related to the consolidated planning process, (2) funding availability and applicant workshops,

(3) publication of the draft AFH/AI, Consolidated Plan and Annual Action Plans, (4) proposed substantial amendments to an adopted Consolidated Plan (as defined further below), and (5) publication of the draft annual performance report. The flyers will be distributed through community-based organizations and other entities throughout the County that serve low- and moderate-income persons, posted in the lobby of the SCHAs, and posted on the CDC's official website. The flyers will be printed in both English and Spanish and radio public service announcements will be made in both English and Spanish.

Notices of (1) public hearings and other public meetings related to the consolidated planning process, (2) funding availability and applicant workshops, (3) availability of the draft AFH/AI, Consolidated Plan, Annual Action Plans, (4) proposed substantial amendments to an adopted Consolidated or Action Plan, and (5) availability of the draft annual performance report will also be published in *The Press Democrat* and posted on the Commission's office door, as well as on the CDC's official website.

Notices of (1) funding availability and applicant workshops and (2) the schedule of public hearings and other public meetings related to the consolidated planning process will be disseminated directly to interested parties who request to be included on a distribution list maintained for this purpose.

Each public hearing will be noticed at least two weeks prior to the public hearing date. Because of the COVID-19 Pandemic which is a federally declared disaster, HUD has waived 24 CFR 91.105(c)(2) and (k), thereby providing the authority to shorten this noticing period to a minimum of 5 days and allow the County to determine reasonable notice and opportunity to comment. This authority is in effect until the end of the County's Fiscal Year (FY) 2020 program year (June 30, 2021). Notices will include the time, date and location or weblink to telephonically participate in the hearing, as well as summary information about the matter to be discussed. A contact name and telephone number will be included in the notice for interested parties who have questions or requests for special accommodations prior to the hearing.

Information on the amount of CDBG, HOME and ESG funding available and the range of activities that may be undertaken will be published in *The Press Democrat* and on the Commission's official website prior to the technical assistance workshop(s) for interested applicants. An estimate of funding to be used for activities that benefit low- and moderate-income persons will be provided at the annual public hearings, held by the Sonoma County Community Development Committee and the Technical Advisory Committee, and will be included in the annual Consolidated Plan Summary.

Publication of Draft Documents

The AFH/AI, annual Consolidated and Action Plan Summary will be published in *The Press Democrat* and on the Commission's official website. This Summary will describe the contents and purpose of the Plan and will include a description of the proposed activities in sufficient detail, including location, to allow citizens to determine the degree to which they may be affected. Notices of any proposed substantial amendments to an adopted AFH/AI, Consolidated or Action Plan, and of the draft annual performance report will also be published in *The Press Democrat* and on the Commission's official website. All notices will list the locations where a full copy of the draft documents will be available for review. At a minimum, these locations will include the Sonoma County Community Development Commission, the Board of Supervisors' office, and the Central Branch of the Sonoma County Library. The draft documents will also be available for download from the Commission's official website. The County will also make free copies of the draft documents available to citizens who do not have Internet access, upon request.

Public Hearings and Public Meetings

The Commission will hold at least three public hearings annually, during different stages of the annual community development planning process to obtain citizens' views and to respond to proposals and questions. One hearing will be scheduled to review housing and community development needs, proposed policies and procedures, and past program performance. At least two public hearings will be scheduled to consider development of proposed activities and the AFH/AI, Consolidated Plan and annual Action Plan submissions. These hearings will be held before the draft Plan is published for a 30-day comment period. Because of the COVID-19 Pandemic which is a federally declared disaster, HUD has waived 24 CFR 91.105(c)(2) and (k), thereby providing the authority to reduce the public comment period to five (5) days. This authority is in effect until the end of the County's Fiscal Year (FY) 2020 program year (June 30, 2021).

Public hearings and meetings will be scheduled at times and locations convenient to potential or actual beneficiaries and with accommodation for persons with disabilities. The hearings will be held at the Sonoma County Community Development Commission office or at the Board of Supervisors' chambers, both of which are located in the most heavily populated, central part of Sonoma County. These offices are easily reached by car, public transportation, bicycle or on foot. The hearing rooms are wheelchair accessible. Public meetings may be held at the Commission office or at the Board of Supervisors chambers, or may be held in other locations throughout the County as may be considered convenient to

interested parties. In all cases, selected locations will be wheelchair accessible. Special accommodations for persons with visual or hearing impairments will be made upon request.

The State of California Governor's Office issued Executive Order N-29-20 which waives certain Brown Act requirements on holding meetings in public spaces, and allows local legislative bodies to hold public meetings telephonically or otherwise electronically to all members of the public seeking to observe and address the legislative body. As such, Commission hearings and meetings to discuss public business will be held virtually formats and not require anyone to gather in a physical meeting space to prevent the spread of COVID-19. This provision will remain in effect until otherwise lifted by the Governor's Office.

In cases where a significant number of non-English speaking residents are expected to attend a public hearing or meeting, the Commission will supply an interpreter. Several Commission staff members are fluent in Spanish and will provide Spanish interpretation. If other non-English speaking residents are expected, the Commission will seek interpreters from appropriate service organizations assisting such persons.

Public Comments

The views of citizens, public agencies and other interested parties will be considered before the County submits the AFH/AI, the 5-year Consolidated Plan, the annual Action Plan, any substantial amendments to an adopted Consolidated or Action Plan and the annual performance report to HUD. Public comments may be presented orally at public hearings and meetings, or may be submitted in writing to the Commission. Following publication of the draft AFH/AI, Consolidated Plan, or Action Plan and any substantial amendments to an adopted AFH/AI, Consolidated Plan, or Action Plan, citizens will be given at least 30 days in which to submit written comments. Following publication of the draft annual performance report, citizens will be given at least 15 days in which to submit written comments. A summary of all oral comments and full copies of all written comments received, including comments not accepted and the reasons therefore, will be attached to the AFH/AI, Consolidated Plan, Action Plan, the substantial amendment or the performance report, as applicable. At a public meeting following the 30-day comment period for the AFH/AI, Consolidated or Action Plan, or any substantial amendment, the Sonoma County Board of Supervisors will review and consider all written and oral comments received prior to approval of the Plan or amendment. The Board may elect to modify the AFH/AI, Plan or substantial amendment prior to adoption and submission to HUD.

Availability of Final Documents

The adopted AFH/AI, Consolidated Plan, Action Plan, approved substantial amendments and the annual performance report will be made available to the public on the Commission's official website. Free copies of the documents will be provided to interested citizens who do not have Internet access, upon request. The documents will also be made available in a form accessible to persons with disabilities, upon request. Citizens may request a copy of the documents by calling the Sonoma County Community Development Commission office or through the "Contact Us" link on the Commission's official website.

Consolidated Plan Amendments and AFH/AI Revisions

Substantial amendments to the consolidated plan and revisions to the AFH/AI may occur when a material change occurs which impacts the circumstances in the County that would cause alterations to the AFH, Consolidated or Action Plan analyses. This may include, but is not limited to, declared disasters, significant demographic changes, civil rights findings or other new significant contributing factors. The County may also receive a written notification from HUD specifying a material change.

A substantial amendment of the Consolidated Plan is defined as:

- 1) A new eligible activity that was not included in the Action Plan is proposed;
- 2) A change in use of CDBG, HOME or ESG funds from one eligible activity to another; or
- 3) A change in the amount of CDBG, HOME or ESG funds allocated to an eligible activity if the change exceeds 10% of the amount of CDBG, HOME or ESG funds previously allocated to that activity as evidenced by the activity's designation as either a "funded" or a "contingency" project in an approved and adopted Action Plan.

Criteria for revision to the AFH/AI:

A material change that affects the information on which the AFH is 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.

Displacement

The Sonoma County Anti-Displacement and Relocation Assistance Plan, amended October, 2002, details the County's plans for minimizing displacement of persons as a result of CDBG, HOME and ESG assisted activities. It provides a guideline for assistance to persons who are displaced as a result of such activities. Copies of the Anti-Displacement and Relocation Assistance Plan are available for

download from the Commission's official website and will be made available to citizens at the annual public hearings held by the Community Development Committee and Technical Advisory Committee.

Response to Complaints

The Commission will provide a timely, substantive written answer to every written citizen complaint relating to the AFH/AI, Consolidated Plan, Action Plan, substantial amendments to a Plan and the performance report, where practicable, within 15 working days.

Public Review of the Citizen Participation Plan

This Citizen Participation Plan was made available for public review and comment prior to adoption, in accordance with the Consolidated Plan public notice, public hearing and public comment procedures described herein. Any substantial amendments to this Citizen Participation Plan will be made available for public review and comment through the same process prior to adoption. This Citizen Participation Plan will be available for download on the Commission's official website. Copies will also be made available to those that do not have Internet access at no charge and will be made available in a format accessible to persons with disabilities, upon request. Interested citizens should call or e-mail the Community Development Commission at 707-565-7501 or at cdc@sonoma-county.org to request a copy of this Plan.