

# CITY OF SAN LEANDRO



## CITIZEN PARTICIPATION PLAN

City of San Leandro  
Community Development Department  
Housing Services Division  
835 East 14<sup>th</sup> Street  
San Leandro, CA 94577

Amended ~~November~~March 18, 2024

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## **1.0 INTRODUCTION**

Regulated by the U.S. Department of Housing and Community Development (HUD), the City of San Leandro (City) is required by law to have a detailed Citizen Participation Plan (CPP) that describes the City's policies and procedures for public involvement in the development of the Five-Year Consolidated Plan and its component Annual Action Plans, Substantial Amendments to these plans, as well as the CPP and review of the Consolidated Annual Performance and Evaluation Report (CAPER). The projects described in the Consolidated and Annual Action Plans use Community Development Block Grant (CDBG), HOME, and other funds. The CPP is a tool to encourage residents to become involved in the development of the plans and documents that outline the housing and community development needs, goals, objectives and activities.

## **2.0 OBJECTIVE**

The law states that the primary purpose of the programs covered by this CPP is to create viable communities by providing decent housing, a suitable living environment and expanding economic opportunities, primarily for very low, low and moderate income people. As per the requirements of 24 CFR § 91.105, the CPP shall identify the implementation process for encouraging public participation and reviewing their recommendations to the Five-Year Consolidated Plan and its component Annual Action Plans, Substantial Amendment(s) to these plans and the CPP, if any, and the CAPER. The objective of the CPP is to involve the public during all stages of the process, and to respond to specific complaints and needs of residents. The City will take all actions necessary to encourage the participation of San Leandro community members, including minorities and non-English speaking persons, persons with disabilities, and residents of public and assisted housing, in addition to local and regional institutions, including the regional Continuum of Care. Community members are asked to identify priority needs and funding allocation recommendations.

The parties involved in the process include neighborhood and citizen groups, non-profit agencies, community-based organizations, social service agencies, business organizations, and San Leandro community members, (referred to as the "public"); the Housing Services Division staff (referred to as "staff") and the City of San Leandro Mayor and Council (referred to as "Council"). All the parties play an integral role in the development of the CPP, the Consolidated Plan, the Annual Action Plans, and the CAPER.

## **3.0 PUBLIC NOTICE**

An advance public notice is an invitation to the public to participate in the planning process for the preparation of the Five-Year Consolidated Plan and its component Annual Action Plans, Substantial Amendments to the Plans, and the CAPER. Public notices will provide a summary of the proposed activities, actions, and funding allocations for the Plans and Substantial Amendments to the Plans, including the CPP. The content of notices shall convey a clear understanding of the event being announced.

Public notice for a public hearing or meeting shall be published at least 10 calendar days prior to a scheduled public hearing, and will announce the date and location of the public hearing. Methods for distributing a public notice may include:

- Published advertisements in at least one newspaper of general circulation serving the San Leandro residents
- Posted notices at buildings which provide access to the public, as listed in Section 4.0
- Publication on the City’s website
- Distributing the notice to any person or organization on a contact list maintained by staff. All interested parties may request listing on the contact list

The City may hold additional community meetings at neighborhood locations before preparing the Five-Year Consolidated Plan. Notice of community meetings will be given in a manner designed to maximize public participation, such as display ads in The San Leandro Times, fliers in newspapers, postings in neighborhoods, e-mail notices, social media posts, announcements to subsidized housing residents and public services participants, and multilingual advertisements on the local television cable channel and the local radio station.

In the event of an unforeseen and unpreventable event that renders in-person public noticing, outreach and/or gatherings impossible or inadvisable, such as but not limited to a disaster or pandemic, public noticing and outreach will follow all reasonable abovementioned electronic noticing. To the extent possible, this will include publication in a local newspaper, email distribution lists, and publication on the City’s website.

**4.0 PUBLIC ACCESS TO INFORMATION**

As required by law, the City of San Leandro will provide the public reasonable and timely access to information and records relating to the Consolidated Plan, the Annual Action Plans, and Consolidated Annual Performance and Evaluation Report.

- Copies of the documents will be available at:
  - Housing Services Division, Community Development Department, City Hall, 835 East 14<sup>th</sup> Street, 1<sup>st</sup> Floor, San Leandro, CA 94577
  - San Leandro City website, <https://www.sanleandro.org/284/Housing-Services-Division>
- Upon request, documents will be made available in a format accessible to persons with disabilities.

**5.0 PUBLIC MEETINGS AND HEARINGS**

When preparing the City’s Consolidated Plan and or component Annual Action Plans, the City will conduct at least two public hearings each year in order to obtain public comment and to provide the public with the City funding allocation determinations.

Both public meetings and hearings will be held after a notice has been published in a local newspaper, at least 10 calendar days prior to the date of the scheduled meeting. An agenda for the meeting shall be posted 72-hours prior to the meeting.

Specifically, public hearings will be held in the evening at City Hall due to its central location, convenient access, and physical accessibility. Hearings may be held during a scheduled City Council, Board, or Commission meeting.

Although the City does not provide transportation to meetings, the City could assist in finding transportation programs that could provide rides for low income persons, seniors, or disabled persons if remote access to the meeting is not available. Every effort will be made to hear the testimony of all who wish to comment at a public hearing; however, in the event that there is not enough time to hear everyone's testimony, the public is encouraged to submit their comments in writing.

Special accommodations will be made for people with disabilities if a request is submitted within five working days before the hearing. The request shall be submitted to the City Clerk's Office. The City will make every effort to provide translators for people who do not speak English and sign language interpreters, if requests are made within five working days prior to the hearing.

A virtual hearing method may be held in lieu of an in-person public meeting and/or hearing. If a virtual meeting or hearing option is used, then real-time responses and accommodation for persons with disabilities and/or with limited English proficiency will be made available to the greatest extent possible. Virtual meetings shall be publicly noticed, and in the event traditional noticing tools are unavailable or will not effectively reach the public, alternative public noticing efforts must be made and documented.

## **6.0 PLAN DEVELOPMENT**

### **6.1 The Five-Year Consolidated Plan ("Consolidated Plan")**

6.1.1 GENERAL INFORMATION: The Five-Year Consolidated Plan is a comprehensive document, providing a detailed description of the housing and community development needs in San Leandro, prioritizes them and then develops a strategy with goals and activities for addressing the needs.

#### **6.1.2 THE PROCESS:**

1. In 2004, and every five years thereafter, the San Leandro Housing Services Division will prepare a calendar containing a schedule for the preparation of the Consolidated Plan. The schedule shall contain tentative dates for the preparation of the Plan along with the dates for community meetings, public notices, public hearings, comment period start and end dates, and when the proposed and final Plans are expected to be available to the public. As soon as feasible after the start of the process, the City will make related data and supplemental information available to the public.
2. Community meetings will be held at various locations convenient to the public. The City will utilize outreach methods that will encourage participation from as many community members as possible. Examples include sending out notices to individuals and organizations on a contact list of interested parties, posting notices at neighborhood centers and other locations accessible to the public, and advertising in the newspaper, local television cable channel and local radio station. The objective of these meetings is to explain the purpose and process of the Consolidated Plan, share HUD-provided data,

identify the needs in the community and clarify the vision San Leandro residents have for the City. The needs will be prioritized and goals, objectives, and activities developed that will be incorporated into the Consolidated Plan.

3. Public Presentation: An informational CDBG Consolidated Plan presentation will be given at a public meeting led by the Community Development Department at either an independently scheduled public meeting or a scheduled meeting of a Board or Commission such as the Human Services Commission, pursuant to public notice.
4. Notice of Public Comment Period: A summary of the proposed Consolidated Plan shall be displayed to solicit comments over at least a 30-day period. The publication should clearly state the start and end date of the comment period. The publication shall include a list of locations, as listed in the Section 4.0, where copies of the Plan will be available for public review. The public notice shall include a brief summary of the Plan's contents and activities that will be undertaken in the first year's Annual Action Plan. Copies of the Plan will be made available upon request. Copies will also be made available in a format accessible to persons with disabilities, upon request.
5. Notice of Public Hearing: The notice of public hearing will include information about the date, time, and location of the public hearing and should follow steps in Section 3.0 of this Plan. The public hearing notice shall be sent to a contact list of interested parties and attendees of the community meetings retained and updated by staff.
6. Public Hearing: The public hearing will be held as described in Section 5.0 of the CPP. All comments submitted by the public, either in writing or orally at public hearings and during the comment period, shall be documented and taken into consideration. A summary of the comments or views accepted and those not accepted, and reasons for not accepting them, shall be attached to the final Consolidated Plan. Upon adoption, staff will submit the final Consolidated Plan with any Substantial Amendments to HUD through IDIS and if requested the City's HUD representative.
7. Expedited Public Noticing and Comment: In the event of an unforeseen and unpreventable event that requires timely action, the City, upon HUD direction, may reduce the public notice and comment period.

## **6.2 The Annual Action Plans**

6.2.1 GENERAL INFORMATION: The Annual Action Plans will implement the objectives, goals and strategies formulated in the Five-Year Consolidated Plan. The Annual Action Plans shall outline the amount and source of funding available, the activities for each objective, and the measurable targeted goal for each of these activities for the year.

### **6.2.2 THE PROCESS**

1. In late fall of every year, the San Leandro Housing Services Division will prepare a calendar containing a schedule for the preparation of the Annual Action Plan for that year. The schedule shall contain tentative dates for the preparation of the Annual

Action Plan, along with the dates for publication of public notices, public hearings, comment start and end period, and when the proposed and final plans are expected to be available to the public.

2. Technical Assistance: City staff will provide technical assistance to individuals and organizational representatives of very low-, low- and moderate- income people who are interested in submitting a proposal to obtain funding for an activity. The assistance would include providing guidance, informational sources, and training. The City will not write proposals for an applicant.
3. Public Presentation: In years where the Annual Action Plan represents the start of a new funding cycle, proposed CDBG objectives and/or activities listed in the Five Year Consolidated Plan shall be presented at a public meeting led by the Community Development Department, at either an independently scheduled public meeting or a scheduled meeting of a Board or Commission such as the Human Services Commission. The Human Services Department shall issue a Request for Proposals for both the CDBG public service activities and the City's Community Assistance Program Grants. City staff and the Commission will evaluate the proposals and provide funding recommendations to the City Council regarding agencies with whom the City could contract for public services to meet the objectives in the Consolidated Plan.
4. Notice of Public Comment Period: A summary of the proposed Consolidated Plan shall be displayed to solicit comments over at least a 30-day period. The publication should clearly state the start and end date of the comment period. The publication shall include a list of locations, as listed in the Section 4.0, where copies of the Plan will be available for public review. The public notice shall include a brief summary of the Plan's contents and activities that will be undertaken in the first year's Annual Action Plan. Copies of the Plan will be made available upon request. Copies will also be made available in a format accessible to persons with disabilities, upon request.
5. Notice of Public Hearing: The notice of public hearing will include information about the date, time, and location of the public hearing and should follow steps in Section 3.0 of this Plan. The public hearing notice shall be sent to a contact list of interested parties and attendees of the community meetings retained and updated by staff.
6. Public Hearing: The public hearing will be held as described in Section 5.0 of the CPP. All comments submitted by the public, either in writing or orally at public hearings and during the comment period, shall be documented and taken into consideration. A summary of the comments or views accepted and those not accepted, and reasons for not accepting them, shall be attached to the final Consolidated Plan. Upon adoption, staff will submit the final Consolidated Plan with any Substantial Amendments to HUD through IDIS and, if requested, the City's HUD representative.
7. Submission: The final plan will then be submitted to HUD by May 15 or another date consistent with an appropriate HUD Executive Order. If requested by the HOME Consortium, a copy will also be submitted to the County of Alameda. Copies of the final Plan will be made available on the City website.

8. Expedited Public Noticing and Comment: In the event of an unforeseen and unpreventable event that requires timely action, the City, upon HUD direction, may reduce the public notice and comment period.

### **6.3 Substantial Amendments to the Five-Year Consolidated Plan and the Annual Action Plans**

- 6.3.1 GENERAL INFORMATION: Throughout the term of the Five-Year Consolidated Plan and the Annual Action Planning periods, these documents may be amended to add or delete action items or objectives. These documents must be amended through the Citizen Participation process if any changes meet the definition of “Substantial Change”.

Substantial Change for the Consolidated Plan is defined as:

- The deletion or addition of an objective, program or project, or any changes to the Priority Needs Summary Table.

Substantial Change for the Annual Action Plan is defined as:

- Addition of a new project or an activity not described in the Annual Action Plan
- Elimination of an existing activity described in the Annual Action Plan
- Change in the funding amount for a project or activity by ~~\$100,000~~50% or more
- Change in the purpose or scope of a project or an activity to the extent that it would be considered a new project or an activity
- Change in the location of the project or activity
- A change in more than 50% of the original number of beneficiaries

These Substantial Amendments are subject to the citizen participation process in accordance with this CPP. The Substantial Amendment(s) must be available to the public for comment, through a process described below.

#### **6.3.2 THE PROCESS**

1. Public Comment Period and Public Notice: Presentation of the Substantial Amendment(s) made to either the Five-Year Consolidated Plan or the Annual Action Plans require advance notice to the public. A public comment period of not less than 30 days will be provided prior to implementing any Substantial Amendment(s). A summary of the Substantial Amendment(s) will be published as described in Section 3.0 within ~~at least a period of 30 days before the Substantial Amendment is implemented~~the public comment period. The publication should clearly state the start and end date for the comment period. The publication shall also include a list of locations, as stated in Section 4.0, where a list of the Substantial Amendments will be available to the public for comment. Free copies will be made available to the public upon request. Copies will also be made available in a format accessible to persons with disabilities, upon request. ~~The notice will include the date, time and location of the public meeting when the Substantial Amendments will be approved.~~



~~2. Public Hearing to Approve the Substantial Amendment(s): A public hearing to consider the Substantial Amendments will be held as described in Section 5.0. The final amended Plan will include public comments received.~~

~~3.2. Submission: The Substantial Amendment(s) will then be submitted in IDIS as well as to the City's HUD Representative. Copies of the amended Plan(s) will be made available on the City Department webpage.~~

~~4.3. Expedited Public Noticing and Comment: In the event of an unforeseen and unpreventable event that requires timely action, the City, upon HUD direction, may reduce the public notice and comment period.~~

## **6.4 The Consolidated Annual Performance and Evaluation Report (CAPER)**

6.4.1 GENERAL INFORMATION: Every year, the City must send HUD a Consolidated Annual Performance and Evaluation Report (CAPER) within 90 days of the close of the program year. The CAPER outlines how funds were actually used and the extent to which these funds were utilized for activities benefiting very low-, low- and moderate-income groups. The CAPER also provides a narrative on progress towards meeting the goals set forth in the Five-Year Consolidated Plan and Annual Action Plan, comparing actual accomplishments to planned actions, and assessing the City's overall performance.

### 6.4.2 THE PROCESS:

1. Public Notice: A public notice shall be published at least 10 calendar days prior to the scheduled date for the presentation of the CAPER at a public hearing. The notice shall be published in accordance with the requirements in Section 3.0 and contain the date, time and location of the public hearing. The notice shall indicate that the CAPER is available for review and comment for at least a period of 15 days, clearly stating the start and end date for the comment period. Copies will be made available to the public upon request and a copy of the proposed CAPER shall be available on the Department's web page. Copies will also be made available in a format accessible to persons with disabilities, upon request.
2. Public Hearing: A public hearing to review the proposed CAPER will be held on a date announced in the notice published in the newspaper as well as on the City's website. Section 5.0 describes the public hearing requirements. All comments received will be taken into consideration. The approved CAPER shall include a summary of public comments.
3. The CAPER will be submitted in IDIS every year by September 30. If requested by the HOME Consortium, a copy will also be submitted to the County of Alameda. Copies of the CAPER will be made available to the public at locations listed in Section 4.0.
4. Performance Reporting Deadline Extensions: It may be necessary to delay the submittal of the CAPER in the event of an unforeseen and unpreventable event. Under the authority of section 24 CFR 91.520(a), the City is required to submit the CAPER to HUD within 90 days after the close of the City's program year on June 30. Under the authority

of section 24 CFR 91.600, HUD has the authority to extend this deadline if there is a determination of good cause.

## **6.5 Citizen Participation Plan Amendments**

6.5.1 **GENERAL INFORMATION:** The CPP adoption and the amendment process for the CPP are the same. HUD regulations require that the City provide reasonable opportunity to the public to comment and present their views on the original CPP and Substantial Amendments to it. These Substantial Amendments may be made through the Citizen Participation process, meeting the definition of “Substantial Change”.

Substantial Change for the Citizen Participation Plan is defined as:

A change in the participation process stated in the original CPP for the Consolidated and Annual Action Plans, Substantial Amendments to them and the participation process for the CAPER.

### **6.5.2 THE PROCESS**

1. **Public Notice:** A CPP Substantial Amendment(s) requires a public hearing including advance public hearing notification. This notice shall be published as described in Section 3.0 at least 10 calendar days prior to the scheduled hearing date. The notice shall contain information about the purpose of the CPP and the pending CPP Substantial Amendment. The notice shall indicate that the CPP Substantial Amendment is available for review and comment for a period of at least 15 days, clearly stating the start and end date for the comment period. The publication shall also include a list of locations, as stated in Section 4.0, where the CPP amendments will be available to the public for review. Copies will be made available to the public upon request. Copies will also be made available in a format accessible to persons with disabilities, upon request.
2. **Public Hearing:** A public hearing to consider the amendments will be held on a date announced in the public notice. See Section 5.0 on public hearing requirements. Copies of the amended CPP will be made available to the public on the City’s website as well as at locations listed in Section 4.0.

## **7.0 EXPEDITED CITIZEN PARTICIPATION DURING A STATE OF EMERGENCY OR DISASTER**

The City shall comply with all HUD memoranda and notices that transmit citizen participation requirements in the event of a local, state, or national emergency or disaster. In order to secure and access new HUD funding and/or re-allocate existing HUD funding to allow the City to respond to the state of emergency in the most expeditious manner, such HUD memoranda and notices automatically supersede any conflicting provisions of the CPP, and therefore no formal amendment is required when such emergency memoranda and notices are in effect.

## **8.0 COMPLAINT PROCEDURES**

Citizens are encouraged to provide their input to the City. A substantive written response will be sent by the City within 15 working days of receipt of the comment. Citizens making the complaints will be encouraged to propose alternative solutions. If there has been any infraction of contract responsibilities, the citizens will be informed of this, and the City will be advised to take measures to enforce the contract and rectify the situation.

## **9.0 ANTI-DISPLACEMENT POLICY**

In the event that any residential displacement and relocation must take place in order to carry out a project or activity, the City will ensure that an anti-displacement and relocation plan is developed in connection with that project, as applicable per Federal regulations. The relocation plan will be available to the public at the locations described in Section 4.0. The Five-Year Consolidated Plan and Annual Action Plan activities shall minimize the extent to which very low-, low- and moderate- income people will be displaced as a result of any proposed project.

In the event that any acquisition and relocation must take place in order to carry out a project or activity, the City will also comply with the acquisition and relocation requirements of the U.S. Uniform Relocation Assistance and Real Property Acquisition Policies Act, as amended.

## **10.0 ADMINISTRATIVE UPDATES**

Changes to any of the HUD planning documents identified in this Citizen Participation Plan that do not meet the criteria for standard or substantial amendments and do not require citizen participation are defined as administrative updates. Examples of administrative updates include grammatical or structural edits that do not substantially change the scope or meaning of activity; and changes in the coding or eligibility determination of a project that does not change the scope, location, or beneficiaries. Administrative Updates may happen at any time at the City of San Leandro's staff discretion.

## **11.0 CPP AMENDMENT DATES**

The City published legal advertisements regarding substantial amendments to the CPP on the following dates:

- June 5, 2020 (public notice of the CPP amendment dated June 15, 2020)
- March 8, 2024 (public notice of the CPP amendment dated March 18, 2024)
- November 1, 2024 (public notice of the CPP amendment dated November 18, 2024)