



CITIZEN PARTICIPATION PLAN

***Updated as of
March 13, 2025***

CITIZEN PARTICIPATION PLAN

I. Introduction and Overview

Introduction

As a recipient of federal funds through the Community Development Block Grant (CDBG), HOME Investment Partnerships (HOME), and Emergency Shelter Grants (ESG), the City of San Bernardino is required to have an adopted Citizen Participation Plan, which contains the City's policies and practices for public engagement and public involvement in the Consolidated Plan process. The Consolidated Plan, and Analysis of Impediments to Fair Housing Choice Report (AI) operate on a five-year cycle, while the Annual Action Plan and Consolidated Annual Performance and Evaluation Report (CAPER) are on an annual cycle for each of the five years of the Plan. The Plans are adopted locally by the City and must be available to the public.

Purpose

The purpose of the Citizen Participation Plan is to provide the method and process by which the City of San Bernardino (City) Consolidated Plan, Annual Action Plan, CAPER, and AI Report processes will comply with the citizen participation requirements promulgated by the U.S. Department of Housing and Urban Development (HUD) pursuant to Section 104(a)(3) of the Housing and Community Development Act of 1974, as amended, and as further augmented by program regulations under 24CFR Part 91.105 (rev.3/14/2016). Through implementation of this Citizen Participation Plan, citizens will be afforded the maximum feasible opportunity

- to provide input on housing and community development needs,
- to provide input on issues and problems affecting very-low and low-income persons
- to learn about the Community Development Block Grant Program (CDBG), HOME Investment Partnerships (HOME) Program, and Emergency Solutions Grant (ESG) Program,
- to provide input on the AI Report and any other applicable programs for which the City may apply for and their expected amount of assistance to be received from each to develop local project proposals
- to provide input to project selections and funding distributions
- to participate in the implementation of funded activities.

Policy Statement

The law declares that the primary purpose of the programs covered by this Citizen Participation Plan is to improve communities by providing decent housing, a suitable living environment, mitigating homelessness, and growing economic opportunity principally for low to moderate income persons. It is the policy of the City of San Bernardino to provide

for, and encourage, public participation, with emphasis on involvement by low to moderate income persons and stakeholders, especially in low to moderate income neighborhoods with high housing and community development needs.

The Consolidated Plan Process

The policies and practices in this Citizen Participation Plan related directly to the stages of action required in the Consolidated Planning process. In general, as an overview, these stages are as follows:

- Collection of demographic and other data in order to identify housing and community development needs.
- Community engagement, including survey, consultation, and other methods, with the public, stakeholders, and other organizations during the formation of the Consolidated Plan and Annual Action Plan.
- Preparation of a draft Strategic Plan (for the Five-Year Plan), preparation of a draft use of funds in the case of the Annual Action Plan, preparation of a draft AI (on a five-year cycle), and the annual preparation of CAPER. All drafts will be available for public comment prior to finalizing each document.
- Formal approval by elected officials of required plans and documents.
- During the course of a program year, it might be necessary to change the use or funding amounts of projects, priorities, funding already budgeted. In accordance with this Plan, when City staff determine that the change reaches the threshold of a “Substantial Amendment,” a formal Substantial Amendment process will be held, including public engagement and adoption in conformance with this Plan.

Overview of the Public Engagement Process

When bringing forward required Consolidated Plans, Annual Action Plans, AI Reports, CAPERS, or Substantial Amendments, Information made available to the public will include relevant information so that the public can give informed comments. This may include items such as - the amount of Community Planning and Development 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 include the steps the City will take to eliminate the need for displacement of persons. If displacement occurs 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).

As outlined in the section below, a notice describing the contents and purpose of the Consolidated Plan, Annual Action Plan, AI Report, CAPER, or Substantial Amendment will be published in one or more newspapers of general circulation. To the extent feasible, draft documents will be posted on the City's website (<http://www.ci.san-bernardino.ca.us/>) and a reasonable number of printed copies will be made available for review at the following locations:

- Office of the Clerk
- Norman F. Feldheym Central Library
- Community Development and Housing Department

Public Hearings. The number, type, and scope of hearings the City will undertake are outlined in the following sections. The City will consider all comments received from residents, stakeholders, and other interested parties as it prepares the final documents that are subject to this Citizen Participation Plan.

Public Comments Received. A summary of public comments will be included with the final submission. The summary of public comments will include a synopsis of comments, along with 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.

II. Objectives and Standards for Citizen Participation

Primary Objectives of the Citizen Participation Plan

A summary of the primary objectives of the Participation Plan is provided below:

- Ensure citizens are informed of the amount of funds (including anticipated program income, as applicable) available under the Consolidated Plan, the range of activities that may be undertaken, and the various program requirements.
- Provide citizens with adequate opportunities to participate in the development of the Consolidated Plan and related Plans and any required changes, revisions, or amendments to the plan.
- Provide citizens with adequate opportunities to participate in the development of the AI Report and any required changes, revisions, or amendments to the plan.
- Provide technical assistance to citizens in developing specific proposals for funding consideration.

- Provide an ongoing process for citizens likely to be affected by program activities to articulate need, express preferences about proposed activities, assist in selecting priorities, and participate in the overall development of the Consolidated Plan, Annual Action Plan, and the AI Report.
- Provide a process through which citizens may participate in the monitoring and evaluation of community development and housing activities.
- Provide a process whereby citizens may comment with respect to any aspect of the City's housing and community development performance and be assured that written comments will be considered and responded to in accordance with federal regulations.

Standards of Participation

All aspects of the City's citizen participation efforts shall be conducted in an open manner with freedom of access to all interested parties. The City encourages the involvement of all groups, including low and very low-income persons and protected classes, those living in blighted areas, and in areas where CDBG and HOME funds are proposed to be used. These standards of participation extend to non-English speaking persons, as well as persons with mobility, visual or hearing impairments, members of minority groups, the elderly, the disabled, the business community, civic groups, and the community at large.

This plan is not intended to exclude any individual citizen input, but rather to enhance citizen participation in this process. All citizens of the City are encouraged to participate in every public meeting and to contact the Community Development and Housing Department with any questions concerning the process and the programs pertaining to the Consolidated Plan, Annual Action Plan, and the AI Report, including the CDBG, HOME, and ESG Programs or any other applicable future programs that are funded by HUD.

Technical Assistance

To help facilitate citizen input, the City will provide technical assistance through its staff to groups representative of low, very low, and extremely low-income residents and protected classes, which may require such assistance in developing proposals for federal funding as required by federal regulations. Technical assistance may be provided by telephone, meetings, U.S. mail, and workshops.

III. Public Information, Outreach, Hearings, and Complaints

Scope of Public Participation in CDBG, ESG, and HOME Programs

As stated in the earlier section on Overview of Public Participation, the City provides several types of citizen participation throughout the entire cycle of the Consolidated Plan program year. Types of engagement can include community meetings (either in person or virtual), community surveys (including online surveys), publicized public comment periods, and public hearings before the City Council prior to, or at time of, adoption. Participation will also be sought by stakeholders and other governmental and nonprofit entities, as outlined in the next section on Outreach.

Public Information

In order for citizens to become informed and involved in the Consolidated Plan, Annual Action Plan, and the AI Report processes, the City will make available all relevant information, including the following:

- Material concerning the amount of funds available for proposed community development and housing activities and the range of activities that may be taken including the amount that will benefit the persons of low and very low income and protected classes;
- Applicable regulations and guidelines governing all aspects of the programs;
- Prior applications, final statements and amendments, grant agreements, grantee performance reports, citizen participation plan and any other reports required by the HUD;
- Documents regarding other important program requirements such as contracting procedures, environmental policies, fair housing and other equal opportunity requirements and relocation provisions;
- Mailings, notices, and any other promotional materials; Minutes of meetings and hearings;
- Any other document the City believes is necessary to the consolidated planning, Annual Action Planning and AI Report processes.

A summary of the proposed Consolidated Plan, Annual Action, and AI Report (as applicable) will be published in one or more newspapers of general circulation and/or published to the City's website. The summary will include: overview of contents and purpose of the Plans and a list of locations where copies of the plans may be examined.

Copies of the entire proposed plans will be available to the public at the following locations:

- Office of the City Clerk

- Norman F. Feldheym Central Library
- Community Development Housing Department; and
- City's website. (<http://www.ci.san-bernardino.ca.us/>)

Except in cases of declared national disaster or civic emergency, where other rules may govern, the Notice will provide for a period of no less than 15 days to receive comments from citizens on draft Consolidated Plans, Annual Action Plans, Fair Housing Plans, and any Substantial Amendments to said plans.

Outreach to Stakeholders and Agencies

To reach as many citizens and stakeholders as possible in the preparation and implementation of the Consolidated and allied Plans, the City shall consult with other public and private agencies and jurisdictions that provide assisted housing, health, and social services during the preparation of the Plans.

The City will conduct direct outreach and create one or more ads/press releases or public notices designed to encourage citizens and stakeholders to participate and provide input in the development of the Plans.

At its discretion, the City, in addition to publishing its application and application process, may also hold a technical assistance workshop in order to assist interested parties in the development of proposals for grant funding. Notice of such workshop may be announced through various means, as determined by the City, including on the City's website, to a list of interested agencies, by direct invitation, by publication with the application, or other public notice. For additional information on assistance, see the section on Technical Assistance.

Public Meetings and Public Hearings, Reasonable Accommodation

The City will conduct public meetings and public hearings during various phases of the Consolidated Plan. Public meetings and hearings shall be held jointly with the preparation of the AI Report. All public meetings and public hearings shall be open to the public.

Public Hearings are held to consider accomplishments and needs, obtain the citizen public's input, and respond to proposals and questions. Together the hearings must address housing and community development needs, development of proposed activities, proposed strategies and actions for the AI Report and a review of program performance.

Both the public and stakeholder engagement and public hearing to consider adoption of the AI Report may be held concurrently with the Consolidated Plan.

Meetings will be held at times and at locations in the City that are convenient and acceptable to potential and actual beneficiaries. Special accommodation shall be made for persons with disabilities upon advance notice and as necessary in accordance with the City's access policy. In cases where a significant number of non-English speaking residents are reasonably expected to participate, an interpreter will be provided by the City upon advance notice and as necessary.

During any one fiscal program year, the City shall conduct a minimum of two (2) public hearings. During a Consolidated Plan/AI Report process, one public hearing will be held to approve Consolidated plan and the Annual Action Plan, pursuant to 24 CFR 91.105.

The City shall conduct a public hearing for each substantial amendment to the Consolidated Plan, Annual Action Plan, or revision of the AI Report. At least 15 days prior to each public hearing, a legal notice shall be published in one (1) or more newspapers of general circulation within a reasonable time limit and/or on the City's website, as allowed by law. The legal notice shall contain the following information:

- Date of Hearing
- Time of Hearing
- Place of Hearing
- Topic(s) to be considered
- Basic summary information and location of documents for review

Public Comment Periods

The Consolidated Plan, Annual Action Plan, AI Report, Substantial Amendments, and substantial amendments to this Citizen Participation Plan are all subject to a public 30-day comment period.

San Bernardino City residents will have the opportunity to review and comment on these draft versions for a period of no less than 30 days prior to submission of the final document to the U.S. Department of Housing and Urban Development (HUD) will be available to the public for review at the locations listed above. The CAPER report is subject to a 15-day public review period.

Report display locations are accessible to persons with physical disabilities; however, if a disability would further limit a person's ability to review the plan at one of the listed locations, upon request, the City will attempt to make a reasonable accommodation and make the plan (or amendment) available in an appropriate format upon reasonable notice in accordance with the City's accessibility policy.

Complaints

The City will make every reasonable effort to provide written responses to complaints within fifteen (15) working days. A copy of each written citizen comment or complaint regarding the Consolidated Plan, Annual Action Plan, and AI Report along with the City's assessment of the comment or complaint and a description of any action taken or written response made will be kept on file as a matter of public records.

IV. Substantial Amendments and Disaster Declaration

Criteria for Substantial Amendments to the Consolidated Plan, Annual Action Plans, and AI Report

The City will substantially amend its approved Consolidated Plan, Annual Action Plan(s) or AI Report whenever it makes any of the following decisions:

- To change its Consolidated Plan funding priorities or the method of fund distribution.
- To revise an accepted AI Report - due to a change in circumstances that affects the AI Report to the extent that it no longer reflects actual circumstances; due to written notification by HUD specifying a material change that requires the revision (24 CFR 5.164).
- To carry out a new activity, using funds from any program covered by the Consolidated Plan (including program income), not previously described in the Action Plan.
- To substantially change the purpose, scope, location, or beneficiaries of an activity as well as any activity whose funding allocation is increased by more than 50% will constitute a substantial amendment. NOTE: Minor changes in scope and location which do not alter the intent of the previously approved project will **not** require a substantial amendment. For example, transfer of funds within a line item budget for a single activity may be administratively approved by the City Manager, Director of Community and Economic Development, or designee, if the purpose and intent of the project continues to be met. In another example, a capital improvement project, such as a street improvement project in a low-income eligible target area, may potentially broaden its scope by amending locations, or adding or extending additional street improvements within the same general location due to unforeseen circumstances.)
- Any substantial changes to the Consolidated Plan, Annual Action Plan, or AI Report are subject to the citizen participation process as described in this Citizen Participation Plan.

Administrative updates and changes to the Consolidated Plan and Annual Action Plan that do not meet the criteria for substantial amendments and do not require citizen participation are defined as administrative updates. Examples of administrative updates include grammatical or structural edits that clarify already adopted actions or which 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.

Disaster/Emergency Events

Disaster/emergency events may require expedited substantial amendments and may be necessary to expedite substantial amendments to the Consolidated Plan in the event of a declared disaster or emergency. There are three types of disasters/emergency events that may necessitate an expedited substantial amendment including:

- (Man-Made-disasters: Man-made disasters can include chemical spills, mass rioting, power outages, dam failure, plant explosions, etc.
- Natural disasters: Natural disasters can include earthquakes, tsunamis, hurricanes, tornadoes, wildfires, flooding and public health issues such as wide-spread disease or the possibility of widespread contagion and disease.
- Terrorism: Terrorism events include bomb threats, biochemical attacks like the spread of anthrax, or cyber-attacks like hacking, phishing, and virus distribution, etc.

In the event of a disaster meeting the above criteria, the federal and state governments may issue additional guidance on how to continue public participation in such cases in order to be able to continue to conduct business and to be able to meet the need for public engagement and information dissemination in a safe and effective manner. Such regulation changes will result in amendments, as needed and directed, by the agencies in charge.