

Community Participation Plan



Plan for 2025-2029

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Introduction

The City of Santa Cruz (City) receives annual funding from the federal Department of Housing and Urban Development (HUD) under the Community Development Block Grant (CDBG) and the Home Investment Partnership (HOME) Programs. For these programs, the City's Five-Year Consolidated Plan and companion annual Action Plan provides direction for housing and community development activities to be carried out by the City.

The City strives to encourage and facilitate the participation of the residents of the City in establishing priorities, developing strategies, and funding allocations under the Consolidated Plan and annual Action Plan, substantial amendments of these Plans, and performance reviews for CDBG and HOME programs. The City developed this Community Participation Plan (CPP) to provide the framework and outline the requirements to accomplish this, providing opportunities for the community to work in partnership with the City to identify community needs and to allocate CDBG and HOME funds.

Definitions

Community Development Block Grant (CDBG): A grant program administered by HUD which allocates money to cities and counties for housing rehabilitation, affordable housing assistance, community services, and community development activities.

HOME Investment Partnership Program (HOME): A grant program administered by HUD which allocates money to cities and counties for affordable housing development, including housing development and rehabilitation, and homebuyer assistance.

Consolidated Plan: The Consolidated Plan is a three- to five-year planning document for the CDBG and HOME programs. The Plan must contain a housing and community development needs assessment, a three- to five-year strategic plan to address the needs identified, a one-year action plan to identify specify activities, and planned use of CDBG and HOME funds.

Annual Action Plan: This document updates the Consolidated Plan on an annual basis and allocates one year's funding (entitlement and program income) to specific projects and activities for the CDBG and HOME programs. The Action Plan is due to HUD 45 days before the beginning of a program year. The City's program year begins annually on July 1, making the Plan due to HUD no later than May 15 of each year.

Consolidated Annual Performance Evaluation Report (CAPER): The CAPER is an annual report summarizing the City's progress in implementing Consolidated Plan.

The CAPER is due to HUD 90 days after the close of a program year. For the City of Santa Cruz, each program year ends on June 30, making the CAPER due to HUD no later than September 30 of each year.

Community Involvement

CDBG and HOME funds are to be used primarily to benefit extremely low-, low-, and moderate-income persons. This Community Participation Plan seeks to involve the participation of residents of the City of Santa Cruz and social service agencies in the development and adoption of the Consolidated Plan, the Action Plan, any substantial amendments, and the Consolidated Annual Performance Evaluation Report (CAPER).

This Community Participation Plan meets the federal requirements outlined in [24 CFR 91.105](#) and will be made available to the public through the City's website at <https://www.cityofsantacruz.com/government/city-departments/economic-development>.

The City will focus its efforts on the involvement of low- and moderate-income persons, those persons living in slum and blighted areas, persons living in low- and moderate-income areas, and persons living in areas where CDBG and HOME funds are proposed to be used. Predominantly low- and moderate-income neighborhoods are those in which 51% or more of the households earn less than 80% of the Area Median Income (AMI). The Economic Development and Housing Department (EDH) will also provide information to the local Public Housing Authority (PHA) about the opportunities for involvement in the community participation process related to the Consolidated and annual Action Plans so that the PHA can share this information with their residents.

The City will conduct a minimum of two hearings annually at different stages in the CDBG/HOME program year (July 1 through June 30). The schedule for review and adoption of the Consolidated Plan, annual Action Plan and CAPER is as follows. The Public Meetings may change as needed depending on when HUD releases funding allocation awards to the City.

- October – November: A notice of funds available (NOFA) is advertised inviting applications for CDBG or HOME funding. Applications are due in December.
- January – February: City Council Health in All Policies Committee (HiAP) hearing, consisting of three City Council members, reviews programs and projects currently proposed for funding and a draft budget for CDBG or HOME funding. Social service providers and HOME/CDBG applicants receive written notice of this meeting, and a meeting notice is posted for the public. The HiAP makes recommendations to the full City Council.
- March: City Council public hearing to review program performance, proposals and applications for funding, and the draft budget recommended by the HiAP. The Council then directs staff to prepare a draft Consolidated and/or Annual Action Plan and when posted publicly and the public is notified, the 30-day public review period begins.
- April: Public hearing and adoption of the Consolidated and/or Annual Action Plan by the City Council.

- May 15: Submittal of the Consolidated and/or Annual Action Plan to HUD, unless deadline is extended by HUD.
- September: Completion of the draft CAPER, a 15-day public review period with the CAPER available for review online (a paper copy may be requested from the Economic Development and Housing Department at 337 Locust Street), incorporation of any public comments received, and submittal to HUD prior to September 30.

All public hearings and meetings will be conducted at City Hall at 809 Center Street in the City Council chambers, unless otherwise noticed, and will be noticed through an ad in the Santa Cruz Sentinel at least 15 days before the hearing. The ad shall contain a summary of the plan, amendment, report, or action being considered and a list of the locations where copies may be examined, information on any associated public hearing or meeting, and notification of the review period.

City Hall is located in the Downtown area of Santa Cruz, approximately half a mile from the City's main METRO transportation hub. City Hall is equipped to accommodate persons with physical disabilities.

City Council meetings may be viewed remotely through various methods including, Zoom, on the City's Website, on Community Television of Santa Cruz County's website and on Comcast Channel 25. City Council meetings are also available via telephone connection. Upon request, the agenda can be provided in a format to accommodate special needs. Those who wish to attend public hearings and will require assistance such as an interpreter for American Sign Language, Spanish, or other special equipment, can call the City Clerk's Department at 420-5030 or email CityClerk@cityofsantacruz.com at least five (5) days in advance to arrange for special assistance.

Adoption & Amendment of the Community Participation Plan

Prior to the adoption of the Community Participation Plan (CPP), the City will provide a notice of the availability of a draft CPP, a 30-day public review period, and a public hearing on the CPP, which will be noticed in the Santa Cruz Sentinel newspaper at least 15 days before the hearing. The proposed CPP will be available for public review at the following locations:

- Santa Cruz City Hall (Economic Development and Housing Office at 337 Locust Street)
- City website: <https://www.cityofsantacruz.com/government/city-departments/economic-development>

Upon request, the CPP will be made accessible to any person with disabilities. The City will provide a reasonable number of free copies of the CPP to residents and groups that request copies. Comments or views of residents received in writing during the public review period or orally at the public hearing will be considered by the Santa Cruz City Council.

The draft CPP will be adopted upon a majority vote of the Santa Cruz City Council at a

designated and publicly noticed City Council meeting. After adoption of the Plan, a final CPP will be prepared that will include a summary of public comments and a summary of any comments not accepted and the reasons they were not accepted. The approved CPP will be posted to the City's website.

The City may amend its approved CPP when a change in the public participation process, as outlined in this plan, is proposed. An amendment to the approved CPP may be reviewed and approved by the HiAP or the City Council. Notice of any amendment to the CPP will be published in Santa Cruz Sentinel at least 15 days prior to the review and adoption by the HiAP or City Council to allow the public with opportunity to review and comment on the amendment. Appeals concerning the amendment should follow the appeal procedures outlined in the last section of this CPP.

Consolidated Plan (Five-Year Strategy & Annual Action Plan)

In developing the Consolidated and Annual Action Plans, the City of Santa Cruz is guided by the overall goal to assist extremely low-, very low-, and low-income households in the areas of:

- Decent housing
- Expanded economic opportunities
- A suitable living environment

Inherent in this goal is ongoing resident participation. The City believes it is essential to have widespread, meaningful participation throughout the planning process to ensure genuine community ownership of the Plan.

The Consolidated Plan consists of three parts:

1. Needs assessment
2. Housing and community development strategic plan
3. Annual Action Plan

Commonly known as the Consolidated Plan, the needs assessment and the housing and community development strategic plan are updated every five years.

The Action Plan is updated annually, reflecting annual CDBG and HOME funding allocations. The annual Action Plan includes the following elements:

- Dollar amounts proposed for each activity
- Description and location of each activity
- Entity responsible for implementation of each activity
- Time frame for each activity

In all cases, the Consolidated and Action Plans seek to minimize the displacement of residents from their homes or places of business.

Three groups are primarily involved in the process of Consolidated and Annual Action Plan development including:

- Residents and local partners
- Local partners, including service providers and government partners
- Economic Development and Housing (EDH) Staff
- HiAP and the City of Santa Cruz City Council

Residents and local partners: Residents, including residents of public and assisted housing in the city, and local partners, including local and regional institutions, the Continuum of Care and other organizations (including businesses, developers, non-profit organizations, service providers, philanthropic organizations, and community and faith-based organizations) have two roles to play. Frequently they serve as the originators of programs and projects that eventually may be funded with CDBG or HOME funds. They work with City staff and other funding organizations to develop proposals. The second role is providing resident input on the Consolidated and annual Action Plans, and the CAPER. The former is done through the application process and the latter through procedures outlined in the CPP.

EDH Staff: Housing and Community Development Division staff within the EDH are responsible for overseeing HUD-funded programs/projects and act in an advisory manner to the HiAP and the City Council concerning planning, implementing and assessing CDBG and HOME programs/activities. Responsibilities include:

- Collecting resident input concerning neighborhood/community needs
- Preparing a prioritized list of neighborhood/community needs for review by the HiAP and the City Council
- Preparing project recommendations for review by the HiAP and City Council and for the Council's final approval
- Reviewing project/program progress

HiAP and the City Council: The City Council, along with the HiAP, evaluates proposals and staff recommendations, makes recommendations that will be reviewed by the public, holds public hearings and carries out the procedures established in this CPP. The City Council makes the final determination about the priority of various community needs that will guide the Council when annually allocating CDBG and HOME funds in the Action Plan.

Development of the Consolidated & Annual Action Plans

The City of Santa Cruz will implement the following strategies to solicit meaningful community input in preparation of the Consolidated Plan and Action Plan.

- Review past year performance and discuss priority needs for upcoming year(s) with the HiAP
- Consult public agencies including other City departments and relevant County agencies
- Consult private organizations that provide health services, social services for children, elderly, disabled, homeless, persons with AIDS, victims of domestic violence, and persons with alcohol/drug abuses, etc.
- Conduct at least one public in-person meeting and one virtual meeting during the development of the housing and community development needs assessment

Resident participation during the development of the Consolidated Plan and Action Plan will take place at meetings which are open to the public. The residents of Santa Cruz are invited to take an advisory role in policy formation regarding program implementation by attending public hearings to make their views known. This will be made clear in all public announcements of the meetings or hearings. Additionally, the City will invite and address all written comments on the Plans.

Adoption of the Consolidated & Annual Action Plans

The following procedures will ensure that all residents will have a chance to influence the final Consolidated Plan and Annual Action Plan.

- Publish an ad in the Santa Cruz Sentinel at least 15 days in advance of the first public hearing notifying the community that two public hearings will be held for the Consolidated and/or Annual Action Plan.
- Conduct a public hearing to obtain resident input on housing and non-housing issues or needs, priorities, and the potential uses of HOME and CDBG funds. Following this hearing, the Council will direct staff to prepare a draft Consolidated and/or Annual Action Plan.
- Publish an ad in the Cruz Sentinel at least 15 days in advance of the second public hearing. The ad shall contain a summary of the Draft Consolidated Plan and/or Action Plan and a list of the locations where copies may be examined, information about the second public hearing, and notification of the 30-day review period.
- Provide the Draft Consolidated Plan and/or Action Plan for public review at the following locations:
 - Santa Cruz City Hall (City of Santa Cruz Economic Development and Housing Office at 337 Locust Street)
 - City website: <https://www.cityofsantacruz.com/government/city-departments/economic-development>

- Make the Draft Consolidated Plan and/or Action Plan accessible to any person with disabilities upon request. The City will provide a reasonable number of free physical copies of the Draft Consolidated Plan and Action Plan to resident groups that request copies.
- Notify residents and local partners by email who have requested notification about the upcoming City Council public hearing and commencement of the 30-day review period.
- Conduct a public hearing to obtain resident input on the Consolidated and/or annual Action Plan.
- Receive comments in writing via email at housing@santacruzca.org or orally during public meetings or hearings. The EDH will consider any comments or views of residents of the community received in writing, or orally at the public hearings, in preparing the Consolidated Plan and annual Action Plan.
- Following a 30-day review period, the Consolidated Plan and/or annual Action Plan will be adopted upon a majority vote of the Santa Cruz City Council.
- Finalize Consolidated Plan and/or Action Plan including a summary of public comments received and a summary of any comments not accepted and the reasons therefore.
- The final Consolidated Plan and/or Action Plan will be submitted in the Integrated Disbursement and Information System (IDIS) to HUD and will be posted to the City's website.

Amendment of the Consolidated Plan

The City may amend the adopted Consolidated Plan and Action Plan. The following outlines the criteria and procedures to be used when amending the Consolidated Plan and Action Plan.

Substantial Amendment Criteria

Consolidated Plan (Five-Year Strategy): The City will amend its approved Consolidated Plan whenever a decision is made to propose a substantial change in allocation priorities. A “substantial change” will constitute a cumulative change equal to or more than 25% of the City's CDBG or HOME entitlement for a program year or changes in the use of CDBG funds from one eligible activity to another.

Annual Action Plan: The City will amend its approved Annual Action Plan whenever one of the following decisions is made:

1. To carry out an activity not previously described in the Annual Action Plan
2. To cancel an activity previously described in the Annual Action Plan

3. To increase the amount to be expended on a particular activity from the amount stated in the Annual Action Plan by more than 25%
4. To substantially change the purpose, scope, location, or beneficiaries of an activity

Substantial Amendment Process

The following procedures will ensure that all residents will have a chance to comment on the proposed amendment to the Consolidated Plan and Action Plan.

- Publish a notice of a 30-day public comment period on the proposed amendment to the adopted Consolidated Plan and/or annual Action Plan. The notice will be published in the Santa Cruz Sentinel and include a summary of the amendment and where copies of the proposed amendment may be examined.
- The proposed amendment will be available for public review at the following locations:
 - Santa Cruz City Hall (City of Santa Cruz Economic Development and Housing Office at 337 Locust Street)
 - City website: <https://www.cityofsantacruz.com/government/city-departments/economic-development>
- Upon request, the amendment will be made accessible to persons with disabilities whenever feasible.
- Receive comments in writing via email at housing@santacruzca.gov or orally during public meetings or hearings. EDH will consider any comments or views of residents of the community received in writing, or orally at the public hearings, in preparing substantial amendments to the Consolidated Plan and annual Action Plan.
- At the end of the 30-day review period, the City Council will adopt the amendment upon a majority vote of the Santa Cruz City Council.
- Finalize amendment including a summary of public comments received and a summary of any comments not accepted and the reasons therefore.
- The approved amendment will be submitted in the Integrated Disbursement and Information System (IDIS) to HUD and will be posted to the City's website.

Interim Assistance Activities

Under the CDBG Program, Interim Assistance Activities are those immediate activities typically involving a quick repair or temporary alleviation of an emergency by performing work that would otherwise be considered ineligible, or is a minor repair that for accessibility reasons needs to be accomplished as quickly as possible. There are three types of interim assistance activities.

1. Immediate Interim repairs: These activities prevent further deterioration of public

improvements and facilities. Permanent improvements must be made as soon as practicable.

2. Alleviating Emergency Conditions which threaten public health and safety: These activities require a determination by a City Official that an emergency condition exists and requires immediate resolution.
3. Minor repairs to provide access for persons with a physical disability to a facility: These activities are limited to making improvements under \$25,000 that will provide immediate accessibility to a community facility that serves the low and moderate income community and are not accessible without this assistance.

Due to their emergent nature, interim assistance activities are exempt from the resident participation, public hearing, and legal noticing processes. The City Council is required to document the emergency nature of the activities at the time it is asked to approve the activity for funding. All interim assistance activities must still meet at least one of the national objectives of the CDBG Program to be eligible and must comply with Davis-Bacon wage rates.

In an Emergency

In the event of an emergency or disaster, the City may determine the need to make a substantial amendment to the Consolidated Plan and annual Action Plan to address the unforeseen needs of the community. When a disaster is declared the following changes to the Community Participation Plan (CPP) will take effect.

1. Review Periods: In the event of an emergency or disaster that presents a serious and immediate threat to the health and welfare of City residents, the noticing requirements for public hearings and public comment periods shall be reduced to five (5) calendar days.
2. Public Comments: In lieu of physical meetings, public comments can be submitted online through the City's website (www.cityofsantacruz.gov) or via email (housing@santacruzca.gov). During Public Hearings and Council Meetings, the City has a strong online presence equipped to receive and publish public comments, questions, and when applicable is equipped to receive live comments via conferencing tools and social media platforms.

Consolidated Annual Performance & Evaluation Report

The Consolidated Annual Performance and Evaluation Report (CAPER) details the accomplishments of the Consolidated Plan and the annual Action Plan. The following procedures will ensure that all residents will have a chance to comment on the CAPER.

- A notice of the 15-day public comment period on the draft CAPER will be published in the Santa Cruz Sentinel. The notice will include a list of locations at which the draft CAPER can be reviewed.

- The draft CAPER will be available for public review at the following locations:
 - Santa Cruz City Hall (City of Santa Cruz Economic Development and Housing Office at 337 Locust Street)
 - City website: <https://www.cityofsantacruz.com/government/city-departments/economic-development>
- Upon request, the amendment will be made accessible to any person with disabilities when feasible.
- Receive comments in writing via email at housing@santacruzca.org. EDH will consider any comments or views of residents of the community received in writing in preparing the CAPER.
- The approved CAPER will be submitted in the Integrated Disbursement and Information System (IDIS) to HUD and will be posted to the City's website.

Public Notification of Public Hearings

Staff will ensure adequate advance notice of all public hearings. Adequate noticing will include:

- Printing notices in the Santa Cruz Sentinel at least 15 days prior to the public hearings.

Language Access & Interpretation Opportunities

According to Census data, the major language spoken other than English in the city area is Spanish. Regardless of which language a person speaks or their ability to speak English, the EDH will make every effort to ensure that Limited English Proficient (LEP) persons have meaningful access its CDBG and HOME programs and services through oral interpreters or written translations of vital documents.

Translation and interpretation services will be provided upon advance request to the extent feasible. The EDH will make vital documents available in Spanish, and other languages to the extent feasible, upon request. Interpretation services at public hearings and meetings will be provided in Spanish if interpretation services are requested at least 3 days prior to the meeting date. Translation and interpretation requests should be sent to housing@santacruzca.gov.

Anti-Displacement & Relocation

If any residential displacement and relocation must take place to carry out a CDBG or HOME program activity, the City ensures that it will develop an Anti-displacement and Relocation Plan in connection with that project as applicable per Federal regulations.

If any acquisition and relocation must take place to carry out a CDBG or HOME program activity, the City will also comply with the acquisition and relocation requirements of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended, and implementing regulations of 49 CFR Part 24.

Access to Records

The City will provide residents, public agencies, and other interested parties with reasonable and timely access to information and records relating to the Consolidated Plan documents and the use of assistance during the preceding five years.

During the City Hall operating hours, all information regarding the HUD programs will be made available upon request, including a year-by-year breakdown of the program expenditures, the most recent monthly report of the program activities, prior year applications, letters of approval from HUD, grant agreements, this Community Participation Plan, reports required by HUD, and the current proposed application.

During the period of planning for the next program year, information to be made available to the public will include such items as the amount of funds available to Santa Cruz, the range of activities that may be undertaken with these funds, the kind of activities previously funded in Santa Cruz, the processes involved in drawing up and approving Santa Cruz's application, the role of Santa Cruz's residents in the CDBG and HOME programs and any other information necessary for Santa Cruz's residents to participate in the process fully.

Requests for information and records must be made to the City of Santa Cruz in writing. Requests can be submitted in person at the Economic Development and Housing Office at 337 Locust Street or via email at housing@santacruzca.gov. Staff will respond to such requests within 15 working days or as soon as possible thereafter.

Technical Assistance

Upon request, staff will provide technical assistance to groups representing extremely low, low and moderate income persons to develop funding requests for CDBG and HOME eligible activities. Technical assistance will be provided as follows:

- Answer, in writing or verbally, all inquiries received from residents or representative

groups relating to funding requests.

- Meet with groups or individuals as appropriate, to assist in identifying specific needs and to assist in preparing request/application for assistance.
- Provide translation of materials or interpretation on an as needed basis.

Comments & Complaints

Comments

Residents as well as agencies providing services to the community are encouraged to state or submit their comments in the development of the Consolidated Plan documents and any amendments to these documents. Written and verbal comments received at public hearings or during the comment period, will be considered and summarized, and included as an attachment to the final Consolidated Plan documents.

Written comments should be addressed to:

City of Santa Cruz
Housing & Community Development Manager
337 Locust Street
Santa Cruz, CA 95060
housing@santacruzca.gov
(831) 420-5150

Complaints

Resident with complaints concerning the Consolidated Plan, the annual Action Plan, substantial amendments, CAPER, or the CPP should contact City HCD staff by phone or in writing within 30 days from the date the document is published for comment. Complaints concerning any CDBG-funded or HOME-funded program in which the person believes access has been limited or denied, must be made within 30 days from the date of the occurrence. Staff will review each complaint based on the information provided within the complaint and provide a complete written responses to resident complaints within 15 working days from the date of their complaint when practicable.

The City will accept written complaints provided they specify the following:

- The description of the objection, and supporting facts and data
- Name, address, and telephone number of complainant and a date of complaint

Complaints shall be sent to:

City of Santa Cruz
Housing & Community Development Manager
337 Locust Street
Santa Cruz, CA 95060
housing@santacruzca.gov
(831) 420-5150

A record will be maintained of all complaints received that will include the nature of the complaint, City investigation of facts and evidence, referrals made, and the final disposition.

Residents may contact HUD directly if they wish to object to any part of the Consolidated Plan, annual Action Plan or CAPER, or if they feel that they have been aggrieved by any program, activity or procedure funded through the CDBG or HOME funds. Such objections should be made to:

Director
Office of Community Planning and Development
U.S. Dept. of Housing and Urban Development
One Sansome Street, Suite 1200
San Francisco, CA 94104-4430

Appeals

Appeals concerning the Consolidated Plan or annual Action Plan documents or decisions, statements, recommendations of the staff, or disposition of complaints should be made first to the City of Santa Cruz Housing and Community Development Manager, then to the City Manager, the City Council, and finally to the San Francisco Area Office of HUD if concerns are not answered.