

DRAFT

**CITIZEN PARTICIPATION PLAN
FOR THE
ESCAMBIA CONSORTIUM**

**Related to Administration of Community Planning and
Development Programs of the U.S. Department of
Housing and Urban Development (HUD)**

**COMPRISED OF
ESCAMBIA COUNTY, CITY OF PENSACOLA, SANTA ROSA COUNTY, AND THE CITY
OF MILTON**

Updated July 2020

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OVERALL GOAL

The purpose of this Citizen Participation Plan (CPP) is to ensure an adequate opportunity for community wide participation in planning, development, implementation, monitoring and evaluation of activities related to the housing and community development activities undertaken through the Escambia Consortium, and/or individually by the jurisdictions comprised of the Consortium. The primary focus of this Plan is upon the development of the Consolidated Plan for the Escambia Consortium and the development of strategies for the integration of activities under the U.S. Department of Housing and Urban Development (HUD) Community Development Block Grant Program (CDBG), HOME Investment Partnerships Program (HOME), Emergency Solutions Grant Program (ESG), and related programs administered by HUD from time to time as deemed essential to the Consortium's Plans and initiatives. The jurisdictions comprising the Consortium currently include: Escambia County, the City of Pensacola, Santa Rosa County, and the City of Milton, including its incorporated municipalities.

ADMINISTRATIVE RESPONSIBILITIES AND CONTACT INFORMATION

Escambia County as an Urban County, and the City of Pensacola as a Metropolitan City, are HUD entitlement communities, each receiving their own allocation of CDBG funding directly from HUD. Escambia County, the City of Pensacola, Santa Rosa County, and the City of Milton have elected to form the Escambia Consortium to jointly receive an allocation of HOME funds, with Escambia County serving as the lead jurisdiction for the HOME Consortium.

Contact Information:

Escambia County CDBG Program/HOME Consortium
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OBJECTIVES

1. To increase interchange of information between Housing and Community Development staff and the local citizenry concerning housing, community development and related needs or concerns.
2. To heighten public awareness as to the purpose and function of the HUD programs available locally, including CDBG, HOME and other types of assistance available, especially among low/moderate income residents of areas targeted for assistance.
3. To increase community participation in data collection/needs assessment, planning, program design, project/activity implementation, substantial amendment, and performance evaluation/reporting issues associated with these programs, and thereby create local support for and understanding of the CDBG, HOME, and other HUD programs, their respective goals and objectives, and their importance to the community.
4. To allow affected or potentially affected citizens, agencies and/or organizations to directly assist in shaping and guiding the impacts of these programs upon their neighborhood as well as the Consortium-wide community.

DEFINITIONS:

For purposes of the CDBG and HOME programs, the following definitions will apply:

Community Development Block Grant (CDBG): A grant program administered by the U.S. Department of Housing and Urban Development (HUD). This grant allots money to cities and counties for housing rehabilitation, affordable housing assistance, community services, and community development activities (including community facilities and economic development).

HOME Investment Partnerships Program (HOME): A grant program administered by HUD and is allocated to cities and counties for affordable housing development. Eligible activities include housing development and rehabilitation and homebuyer assistance. The City of Pensacola, Santa Rosa County, and the City of Milton are eligible for funds through membership with Escambia County in the HOME Consortium.

Emergency Solutions Grant Program (ESG): A grant program administered by HUD, which is allocated to cities and counties for the purpose of street outreach, emergency shelter, homelessness prevention, rapid re-housing and Homeless Management Information System (HMIS) for the benefit of individuals or families that are homeless or at risk of homelessness.

Annual Action Plan: An Annual Action Plan is prepared during each year of the 5 year Consolidated Plan and specifies the amount of funding the Consortium members anticipate receiving from HUD and describes the activities to be undertaken with those funds to address needs and priorities outlined in the Consolidated Plan.

Assessment of Fair Housing (AFH): Assessment required by HUD under the Affirmatively Furthering Fair Housing (AFFH) rule. The AFH is an analysis of fair housing data, issues, and contributing factors in a local government jurisdiction and/or region and identification of fair housing goals and priorities for the jurisdiction and/or region. Local governments will strive to include local public housing agencies in the preparation of the AFH.

Consolidated Plan: The Consolidated Plan is a five-year planning document for the CDBG,HOME programs as required by 24 CFR Part 91. The Consolidated Plan must contain a housing and community development needs assessment, a five-year strategic plan to address the needs identified, and a one-year annual action plan to identify specific activities and planned use of CDBG,HOME, and ESG funds.

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

Median Family Income (MFI): HUD surveys major metropolitan areas annually to develop an index of median family income by household size.

Low- and Moderate-Income Households: Pursuant to HUD regulations, the primary beneficiaries of the CDBG and HOME program should be low- and moderate-income households, defined by HUD as follows:

Extremely Low-Income: 0-30% County Median family income (MFI) adjusted for household size.

Low-Income: 31-50% County MFI adjusted for household size.

Moderate-Income: 51 - 80% County MFI adjusted for household size.

Low- and Moderate-Income Neighborhood: Generally defined as a census tract(s) or block group(s) in which a minimum of fifty-one percent (51%) of the residents have an income not exceeding eighty percent (80%) of the area median family income.

Slum and Blighted Area: An area that meets the definition of a slum, blighted, deteriorated or deteriorating area under State or local law, typically identified as Redevelopment Project Areas, or where a substantial number of deteriorating or dilapidated buildings or improvements are present throughout the area.

Publicly Assisted Housing Developments: Housing projects (either rental or ownership housing) developed with the assistance of public funds such as HOME, CDBG, and redevelopment set-aside funds.

Program Year: The Program Year utilized by the Consortium is October 1 through September 30.

PUBLIC HEARINGS, NOTICES AND MEETING REQUIREMENTS

The public notice and public hearing requirements stipulated below are based upon the Consolidated Plan regulations provided in the governing Federal Regulations found at 24 CFR Part 91. All advertised meetings and hearings shall be open to the public. Every effort will be made to minimally comply with or exceed these requirements with respect to preparation of the Consortium's Consolidated Plan and related activities.

Five Year Consolidated Plan and/or Annual Plan Planning Process

A public notice will be published, and a minimum of one public meeting will be held during the formative stage of the Consolidated Plan development process. Every effort will be made to hold one public meeting in Escambia County and one in Santa Rosa County. The purpose of the notice and hearing will be to encourage citizens and interested parties to provide their verbal and/or written views on: 1) housing and community development needs, including priority non-housing community development needs; and/or 2) recommendations concerning potential activities or projects to aid in addressing their concerns.

PROPOSED Consolidated Plan and/or Annual Action Plan

Based upon prior input, appropriate staff will prepare a Proposed Draft of the Escambia Consortium Consolidated Plan and/or Annual Action Plan. A summary of the PROPOSED Plan(s) will be advertised in the non-legal section of the local newspaper having the major circulation in the Consortium, and the notice will advise of:

- a. Specific locations where complete copies of the DRAFT Plan can be reviewed. Locations shall include, but not be limited to: The Escambia County Neighborhood Enterprise Division Office; City of Pensacola Housing Office; and County and City websites.
- b. Impending public hearing(s) to receive verbal and written comments from the public, as well as a minimum 30-day period for public review and comment concerning the PROPOSED Plan. The 30-day comment period shall fully expire prior to the adoption of the Consolidated Plan by Escambia County, the lead participating jurisdiction.
- c. The amount of assistance the Consortium expects to receive from the CDBG, HOME and other HUD programs (including grant funds and estimated program income) and the range of activities that may be undertaken.

FINAL Consolidated Plan and/or Annual Action Plan

Notice of the availability of the FINAL Plan document will be provided through a non-legal advertisement in the local newspaper having the major circulation within the Consortium. The Final Plan notice will also incorporate:

- a. Notice of the Consortium members jurisdiction's plans to minimize displacement of persons and to assist any persons displaced in accordance with each jurisdiction's

locally adopted Anti-Displacement and Local Relocation Policies or Plans. The notice shall also advise of the availability of such Policies and Plans to the public.

- b. State the estimated amount of HUD CDBG, HOME and other HUD funds which will benefit persons of low and moderate income. (NOTE: This may be included in both the DRAFT and FINAL Plan notices as warranted.)
- c. Notice of the availability of an Escambia Consortium Citizen Participation Plan and, as warranted, provision for review and comment concerning the original Citizen Participation Plan or any substantial amendments to the Plan.

Amendments to Consolidated Plan and/or Annual Action Plan

A Substantial amendment to the Consolidated or Annual Action Plan will be considered under the following conditions:

1. The addition or deletion of a program activity differing from ones originally described in the Consolidated Plan or Annual Action Plan.
2. A change in the purpose, scope, location, or beneficiaries of activities cited in the Consolidated Plan or Annual Plan.
3. Budget changes for any individual activity is increased or decreased by an amount in excess of twenty-five percent (25%) of the originally approved activity line item for each respective program year.

Upon reaching the thresholds identified, a non-legal advertisement will be placed in the local newspaper with the greatest Consortium-wide circulation that identifies the purpose of the amendment, the projects or activities affected and the amount of funds involved. The notice will provide for a minimum 30-day public review and comment period prior to implementation of the amended activities or projects.

Consolidated Annual Performance Evaluation Report (CAPER)

Adequate opportunity for public review and comment on the Consortium's annual Consolidated Annual Performance Evaluation Report (CAPER) or other alternate reporting format as prescribed by HUD will be provided through public notification of the availability of the report by placing a non-legal advertisement in the local newspaper with the greatest Consortium-wide circulation. The notice will provide for a minimum 15-day public review and comment period prior to submission of the performance report to HUD.

Assessment of Fair Housing (AFH) Plan

The purpose of the AFH Plan is to meet requirements established by HUD under the Affirmatively Further Fair Housing Rule (24 CFR § 5.158). Community participation, consultation, and coordination are required under this plan. HUD has strongly encouraged regional participation and cooperation from recipients of HUD funding in the preparation of this plan. Consortium members will make outreach to include public housing agencies (PHAs) such as the Area Housing Commission, Milton Housing Authority, and the Pensacola Housing Department.

A minimum of two public meetings will be held to receive input on fair housing issues and contributing factors during the development of the AFH Plan. Outreach will include but is not limited to the following: public notice advertisement in the local newspaper, publication on County and City websites, and direct outreach to PHAs and consulting agencies such as the Escambia Human Relations Commission and local legal aid agencies. Additionally, a public hearing will be held before the proposed AFH is published for comment.

The draft AFH Plan will be made available on County and City websites and will provide a minimum of 30 calendar days to allow the public to review and make comments. A public notice will be advertised in the local newspaper advising of the availability of the draft AFH Plan. All comments received in writing or orally at public hearings or during the comment period will be considered in the formulation of the plan and a summary of those comments will be included within the final Plan document for final approval by Consortium members.

Citizen Participation Plan

This Citizen Participation Plan (CPP) sets forth the Consortium's policies and procedures for citizen engagement in the development of the Consolidated Plan, Annual Action Plan, Amendments, the CAPER, and AFH Plan.

PUBLIC HEARINGS/NOTIFICATIONS:

All public hearings and opportunities for public input/comment will minimally be announced in the non-legal section of the *Pensacola News Journal*, the newspaper with major Consortium-wide circulation, as a display retail advertisement a minimum of five (5) days prior to the scheduled public hearing. Within the confines of program schedules and deadlines, every effort will be made to advertise ten (10) days in advance of all public input/data collection public hearings. Notice of public hearings will be advertised at least once during the applicable period. Copies will be made available on the County and City websites.

Hearings will be held at times and locations convenient to potential or actual beneficiaries and will be held in accessible locations to accommodate persons with special needs or disabilities. To ensure accessibility, hearings will be held at one or more of the following locations: Pensacola City Hall, Committee Meeting Room, 222 West Main Street, Pensacola, Florida; Escambia County Courthouse, Board of County Commissioners Meeting Room, 223 South Palafox Place, Pensacola, Florida; Santa Rosa County Administrative Center, Milton, Florida; City of Pensacola Housing Office, 420 W. Chase Street, Pensacola, Florida; and/or in designated accessible community facilities within target areas or the local community. Comments and views of citizens received in writing or orally during the above referenced public hearings shall be considered in the report and/or supplementary documents related thereto, and a summary incorporated as an attachment to the final Consolidated Plan, the final Annual Action Plan, Substantial Amendments, AFH Plan, or the CAPER.

CITIZEN PARTICIPATION IN RELATION TO DISASTERS OR EMERGENCY EVENTS

In compliance with HUD Memos dated March 31, 2020 and April 9, 2020, the Consortium will make the following allowances for disaster response and emergency preparedness, especially in relation to infectious disease events such as COVID-19. These allowances include the following:

- Virtual hearings may be considered as an allowed method for citizen participation when necessary for public health reasons;
- Consolidated and Annual Plan Amendments will be available for not less than a 5 day public review and comment period in lieu of the usual 30 day period.

These allowances do not change current citizen participation policies but permit expedited action in relation to disasters or emergency events.

RESPONSE TO PROGRAM INQUIRIES

Written responses to written program inquiries, comments or suggestions will be provided by the responsible administrative office within fifteen (15) working days, where practicable, after receipt of the written communication. Such inquiries and responses shall be retained in the official records of the applicable administrative office.

APPLICABILITY OF THE CONSORTIUM CITIZEN PARTICIPATION PLAN

The requirements of this Plan shall pertain to the collective actions of the members of the Escambia Consortium with respect to the Consolidated Plan, the Annual Action Plan, Substantial Amendments to the Plan, AFH Plan, and/or the Consortium Performance Report(s), and shall be considered the minimum threshold for such actions. As this Consortium Plan incorporates the activities of an Urban County (Escambia) and an entitlement City (Pensacola), the citizen participation process undertaken by the Consortium and/or through individual actions of the CDBG entitlement jurisdictions will provide for citizen participation addressing the proposed activities within each CDBG entitlement community. Nothing in this document shall prohibit member jurisdictions from exceeding the requirements cited herein by developing a separate Citizen Participation Plan addressing each individual local government's planned public participation activities.

ACCESS TO PUBLIC INFORMATION

All program information will be available for inspection by interested citizens, public agencies, and other interested parties including, at a minimum: PROPOSED and FINAL Consolidated and Annual Action Plans (including the planned use of HUD CDBG, HOME, and ESG funds); CDBG, HOME, and ESG program regulations; local CDBG, HOME and ESG program guidelines and operating procedures; Substantial Amendments to the Consolidated Plan or Annual Action Plan; CAPER; AFH Plan; reports concerning the use of CDBG, HOME and ESG funds by the Consortium's member jurisdictions over the past five years; and this Citizen Participation Plan.

These documents will be available during normal working hours (Monday through Friday, from 8:00 a.m. to 4:30 p.m.) at: Escambia County Neighborhood Enterprise Division, 221 Palafox Place, Suite 200, Pensacola, Florida; Pensacola Housing Department, 420 West Chase Street, Pensacola, Florida; Santa Rosa County Community Planning, Zoning and Development Division, 6051 Old Bagdad Highway, Suite 201, Milton, Florida. This information will be available at no charge. The full text of the adopted Consolidated Plan, Annual Action Plan, AFH Plan, and CAPER will also be made available online at the Escambia County website.

In addition, specific information dissemination will be undertaken to inform and encourage participation by low-and moderate income persons residing in areas where CDBG funds are

proposed to be used by residents of predominately low and moderate-income neighborhoods, as defined by the jurisdiction. Activities might include neighborhood meetings at community centers, churches or other convenient locations; community outreach by Housing and Community Development Staff; regular meetings with community-based advisory groups or committees; limited technical assistance and referrals regarding development of proposals for assistance provided through HUD; and availability of written (flyer type) information concerning the various programs. These activities provide excellent opportunities for interaction in a neutral setting between staff and those residents served by the program, whereby citizens' views and recommendations are strongly encouraged.

TECHNICAL ASSISTANCE

The Escambia Consortium is committed to providing technical assistance to individuals and organizations representing low/moderate income persons developing proposals for funding assistance under any of the programs or plans covered by the Consolidated Plan. Consortium Staff will provide technical assistance, to the greatest extent feasible to all applicants or potential applicants and citizens. Technical assistance does not guarantee receipt of funds.

Requests for technical assistance shall be made in writing specifying the nature of the technical assistance requested and specifying the organization requesting assistance.

NON-ENGLISH SPEAKING PERSONS

The Consortium has a significantly smaller Spanish-speaking population than the State of Florida as a whole. Operational experience in the various programs operated within the Consortium has proven that the number of families speaking Spanish or other foreign languages is not significant. However, arrangements will be made for the interpreters or translation of documents on an "as requested" basis. A minimum 72 hour period will be required in order to arrange such services upon request.

MEETING ACCESS TO PERSONS WITH DISABILITIES

To encourage the participation of persons with disabilities, all locations for public hearings and meetings shall be handicapped accessible. Such locations shall have ample parking and/or designated handicapped parking areas, appropriate access corridors, ramps, adequate width hallways and door openings, and shall be elevator equipped if said meetings are held above the first floor level. Notices of public hearings and meetings shall state that special assistance and arrangements will be made for interested parties upon reasonable request. In accordance with the Americans with Disabilities Act (ADA), any person needing accommodations to attend or participate, pursuant to the ADA, should contact (850) 595-4947 at least 72 hours in advance of the event in order to allow time to provide the necessary services. The Center for Independent Living of Northwest Florida is utilized as a local contact to determine workable alternatives for the disabled with respect to access issues.

Request of materials in an alternate format may be directed to the Consortium member holding the meeting.

COMPLAINT AND GRIEVANCE PROCESS

Citizens, administering agencies, and other interested parties may submit complaints and grievances concerning the Consolidated Plan, Annual Plan, Substantial Amendments to the Plan or Substantial Changes to the Planned Use of Funds, or Performance Report(s). Complaints

should be in writing, specific to the subject matter, and include facts to support allegations. Written complaints should be addressed to the Administrative Contacts noted within this plan.

The response period should not exceed fifteen working (15) days from the date of receipt of the inquiry by the appropriate local Administrative Office and will be provided in writing. Any responses to HOME related complaints within the City of Pensacola or Santa Rosa County's jurisdictions should be copied to Escambia County as the lead jurisdiction. If this fails to resolve the complaint or related issues, an appeal may be made to Escambia County for the HOME program or HUD for the CDBG program.

It is the policy of HUD; the Escambia County Board of County Commissioners and the Neighborhood Enterprise Division; the City of Pensacola and the Pensacola Housing Department; and Santa Rosa County and Santa Rosa County Community Planning, Zoning and Development Division, to provide a means by which persons may file complaints of discrimination in housing and/or HUD assisted contracts. Therefore, it is the policy of these entities to enforce nondiscrimination practices in program policy, procedure or performance. The initial effort to resolve such complaints shall be the responsibility of the respective local Administrative Office.