



# City of San Leandro

Meeting Date: June 1, 2020

## Staff Report

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**File Number:** 20-218

**Agenda Section:** PUBLIC HEARINGS

**Agenda Number:** 5.A

**TO:** City Council

**FROM:** Jeff Kay  
City Manager

**BY:** Tom Liao  
Community Development Director

**FINANCE REVIEW:** Liz Warmerdam  
Interim Finance Director

**TITLE:** Staff Report for the City of San Leandro Public Hearing on the Proposed Amendments to the U.S. Department of Housing and Urban Development (HUD) (1) FY 2015-2020 Five-Year Consolidated Plan, (2) FY 2019-2020 Annual Action Plan & (3) Citizen Participation Plan

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### SUMMARY AND RECOMMENDATIONS

Staff recommends the City Council hold a public hearing tonight to review the draft amendments to the following three documents and direct staff to publish the draft amendments: (1) FY 2015-2020 Five-Year Consolidated Plan, (2) FY 2019-2020 Annual Action Plan & (3) Citizen Participation Plan; solicit public comment for a 5-day period (June 2 - June 7, 2020), and set a public hearing for June 15, 2020 to consider final approval of the Amendments to these proposed documents. The City will also consider on June 15, 2020 the final version of the FY2020-2025 Five-Year Consolidated Plan and FY2020-21 Annual Action Plan, which the City Council reviewed as drafts on March 16, 2020.

### BACKGROUND

The City of San Leandro is an entitlement grantee of Community Development Block Grant (CDBG) funds from the Federal Department of Housing and Urban Development (HUD). In order to receive its annual CDBG grant allocation, the City must update its Consolidated Plan every five years and submit an Action Plan to HUD. In response to the Coronavirus Pandemic (COVID-19), the Coronavirus Aid, Relief, and Economic Security Act (CARES Act), Public Law 116-136 was adopted and authorized on March 27, 2020. As a result, HUD awarded the City of San Leandro \$451,972 in Community Development Block Grant-Coronavirus (CDBG-CV) stimulus funds to prevent, prepare for, and respond to COVID-19. There are three major goals identified for the funds under the Housing and Community Development Act from which the CDBG Program originated:

- Provide decent housing;

- Provide a suitable living environment; and
- Expand economic opportunity.

In addition, CDBG funds must be used to meet one of three national objectives:

- 1) benefit low- and moderate-income persons;
- 2) aid in the prevention of slum and blight; or
- 3) meet an urgent need.

Given that all CDBG-CV activities must still meet one of three National Objectives of the CDBG Program noted in the current FY2015-2020 five year Consolidated Plan document, the City must document COVID-19 as an Urgent Need National Objective. In order to do this, an Urgent Need Certification must be provided to HUD with the current five year Consolidated Plan and Annual Action Plan for the year of the Urgent Need activities. Documentation and evidence the City certified that the CDBG activity was designed to address the urgent need must be maintained as part of the permanent CDBG records for all applicable activities. See Attachment B: City of San Leandro Justification of Urgent Need.

### **Analysis**

In response to the Coronavirus Pandemic (COVID-19), the Coronavirus Aid, Relief, and Economic Security Act (CARES Act), Public Law 116-136 was adopted and authorized on March 27, 2020. As a result, the U.S. Department of Housing and Community Development (HUD) awarded the City of San Leandro \$451,972 in Community Development Block Grant-Coronavirus (CDBG-CV) funds to prevent, prepare for, and respond to COVID-19. The CARES Act allows for reimbursement of costs incurred prior to the date of enactment of this legislation in addition to removal of the spending caps normally in place for Public Services expenditures as long as those costs are in response to COVID-19. (Note that the removal of the Public Services expenditure caps are only allowed for the 2019-2020 and 2020-2021 Annual Action Plan Program Years.) Additionally, the CARES Act allows HUD to waive or specify alternative requirements to expedite distribution of funding in response to COVID-19.

Soon after the signing of the CARES Act, HUD issued guidance that allows cities to shorten the public comment period for amending prior 5-Year Consolidated Plans or Annual Action Plans to maximize the use of CDBG and CDBG-CV funds allocated to entitlement jurisdictions. HUD has also required CDBG grantees to make specific administrative changes to their federally mandated Citizen Participation Plans. CDBG grantees like San Leandro established their Citizen Participation Plans, which outline public procedures related to the use of CDBG funds (such as how localities will outreach to the public, the number of public hearings to hold, and how to define a substantial amendment) since federal HUD Consolidated Planning regulations were adopted in the mid-1990s.

On April 13, 2020, the City of San Leandro received a waiver that permits a reduced period for public noticing and public comment on this amendment to the 2019-2020 Annual Action Plan for the period of July 1, 2019 to June 30, 2020. The City is taking this opportunity to re-allocate prior year unspent CDBG funds for Americans with Disabilities Act (ADA) Transition Plan improvements to City facilities and program new stimulus funding, CDBG-CV, towards COVID-19

emergency services. The City may also allocate additional funds as they are available.

The Amendments to the City of San Leandro's 5-Year Consolidated Plan for FY 2015-2024, the FY 2019-2020 Annual Action Plan and the Citizen Participation Plan are necessary to allocate HUD resources to address COVID-19 and its related impacts. Additionally, it will identify how the City plans to use available funds by updating its annual goals and objectives and the related projects targeted for funding to address COVID-19.

#### Proposed Amendments to the Consolidated Plan for FY 2015-2019

The proposed amendments to the City of San Leandro's 5-Year Consolidated Plan for FY 2015-2024 are located mainly in the following sections (see full detail in Attachment C):

- PR-05 Lead & Responsible Agencies
- PR-10 Consultation
- PR-15 Citizen Participation
- NA-05 Needs Assessment Overview
- MA-65 Hazard Mitigation
- SP-25 Priority Needs
- SP-35 Anticipated Resources
- SP-45 Goals

#### Proposed Amendments to the FY 2019-2020 Annual Action Plan

The proposed amendments to the City of San Leandro's FY 2019-2020 Annual Action Plan are located mainly in the following sections (see full detail in Attachment D):

- Summary of Citizen Participation
- AP-10 Consultation
- AP-12 Participation
- AP-15 Expected Resources
- AP-20 Annual Goals and Objectives
- AP-35 Projects
- AP-38 Project Summary

#### Proposed CDBG-Funded Added Public Service Activities - FY 2019-2020 Action Plan

The main changes to the proposed CDBG-funded activities in the FY 2019-2020 Action Plan are in the Public Services category. Based on City Council guidance since the Bay Area shelter in place orders began on March 17, 2020, staff recommends increases to public services related to the following critical and basic needs for primarily lower income households severely impacted by this public health crisis: food supply/distribution, mental health services, domestic violence services and rental housing payment relief/assistance.

While HUD temporarily streamlined CDBG public noticing and comment requirements to address COVID-19 for this and the next fiscal years, it has not eased cumbersome programmatic administrative requirements for distributing CDBG funds. To efficiently and effectively distribute

CDBG-CV and available FY2019-2020 CDBG funds, City staff made its public service funding increase recommendations based on the following criteria for eligible nonprofits: 1) has experienced or is anticipating increased service demand related to food supply/distribution, mental health counseling, domestic violence services, 2) has been publicly vetted under the current two year FY 2019-2021 Community Assistance Program (CAP) grant funding cycle, and/or 3) has capacity and experience to comply with federal CDBG administrative requirements.

Regarding the proposed Rental Assistance Program, which will be new for the City and will provide up to 3 months of rent relief/assistance to income eligible renters impacted by COVID-19, the Housing Services Division issued a Request for Proposal (RFP) for qualified nonprofits to administer the new program. Staff will bring forward the recommended nonprofit administrative contracts to the City Council in late June/early July.

A summary of the proposed Amendment to FY 2019-2020 CDBG funding allocations by funding category is summarized with funding amounts in Attachment A. Given the removal of the Public Service funding cap, the City will increase its current FY 2019-2020 commitment of \$111,441 to \$603,413 of its annual CDBG allocation toward Public Services. (Note: On June 15, staff will also recommend additional CDBG funding for other public service providers in the FY2020-2021 Annual Action Plan to address priority needs described above related to COVID-19.)

<u>Agency/Project Name</u>	<u>Approved FY19-20</u>	<u>Proposed FY19-20 Increase</u>
CALICO/Youth Domestic Violence	\$22,000	\$0
<b>Davis Street Family Resource Center/Basic Needs &amp; Mental Health</b>		
	\$42,941	\$0
SOS/Meals on Wheels	\$29,000	\$15,000
Spectrum Community Services/ Senior Meal Program	\$17,500	\$25,000
Rental Assistance Program	<u>NA</u>	<u>\$451,972</u>
<b>TOTAL</b>	<b>\$111,441</b>	<b>\$603,413</b>

**Amendments to the Citizen Participation Plan**

The main changes to the Citizen Participation Plan are summarized in Attachment E and contain the following elements.

- Allows for virtual hearings in the event of federal, state or local authorities’ social distancing orders that limit public gatherings for public health reasons;
- Affirmation that, to the greatest extent possible, virtual hearings will appropriately accommodate those members of the public with physical challenges and/or limited English proficiency;
- Language specifically referencing HUD waiver obtained by the City of San Leandro that provides for a 5-day review/comment period for funding related to COVID-19 response;

- Added language for the Citizen Participation requirements in the event of a disaster/emergency;
- Added language in the Urgent Needs section that describes activities that the City of San Leandro could take to address a similar future event;
- Administrative updates added in track changes format to allow for grammatical and/or structural edits that do not substantially change the scope or meaning of the activities covered in the document.

### **Current Agency Policies**

Current City Council Policy is defined by the FY 2015-2019 Consolidated Plan, adopted by Resolution No. 2015-208 on April 20, 2015 and the FY 2019-2020 Annual Action Plan, adopted by Resolution No. 2019-075 on May 6, 2019. The draft FY 2020-2024 Consolidated Plan that had a first public hearing on March 16, 2020 will eventually replace the FY 2015-2019 Plan.

### **Applicable General Plan Policies**

The HUD Five-Year Consolidated Plan addresses the goals of the Housing Element of the General Plan, such as increasing the supply of affordable for-sale and rental housing, providing opportunities for home ownership, preserving and rehabilitating existing affordable owner-occupied and rental housing, and addressing populations of particular need.

### **Environmental Review**

If applicable, National Environmental Protection Act (NEPA), review will be conducted for each project or activity approved by the City Council. Neither NEPA nor CEQA apply to the FY 2015-2019 Consolidated Plan and FY 2019-2020 Action Plan.

### **Summary of Public Outreach Efforts**

The Amendment to the City's Citizen Participation Plan is specifically in response to accommodations provided by the CARES Act to allocate funding as quickly as possible in response to COVID-19. One of the amendments to the Citizen Participation Plan allows for reduced requirements for notices of public hearings (including partial translations in Spanish and Chinese) and availability of the proposed Substantial Amendments to the 2015-2019 Consolidated Plan and FY 2019-2020 Annual Action Plan. As a result, there will only need to be a 5 day comment period. A Public Notice of this Public Hearing and the Public Comment Period was published in the East Bay Daily Review on May 22, 2020 and sent to a mailing list of those who have expressed interest in the City's CDBG funding activities. Due to the Alameda County Shelter In Place Order, summaries of the proposed amendments to the 2015-2020 Consolidated Plan, the FY 2019-2020 Annual Action Plan, and the Citizen Participation Plan will be available for review on the City's website (<http://www.sanleandro.org/depts/cd/housing/plans.asp>) or the Library website (<https://www.sanleandro.org/depts/library/default.asp>).

### **Fiscal Impacts**

Per Attachment A, the City has a total of \$2,068,744 in CDBG funds in FY2019-20 including the original FY2019-2020 entitlement grant amount of \$707,517, new \$451,972 CDBG-CV funding and over \$500,000 in unspent CDBG funds for prior year City ADA Transition Plan improvements to City facilities to fund the enhanced public service projects/programs described above in "Proposed CDBG-Funded Added Public Service Activities - FY 2019-2020 Action Plan."

HUD typically enters into contract with the City for CDBG grant funding. The grant is paid on a reimbursement basis after expenditure by the City for activities designated in the FY 2019-2020 Annual Action Plan.

### **Budget Authority**

Budget authority for CDBG funds is derived from Title I of the Housing and Community Development Act of 1974 (24 CFR 570 et. seq.) and the Coronavirus Aid, Relief, and Economic Security Act (CARES Act), Public Law 116-136 that was adopted and authorized on March 27, 2020.

### **Attachments to Staff Report**

- Attachment A: Draft of Amended FY 2019-2020 CDBG and HOME Fund Allocations
- Attachment B: City of San Leandro Justification of Urgent Need
- Attachment C: Summary of Amendments to the Consolidated Plan for FY 2015-2019
- Attachment D: Summary Amendments to the FY 2019-2020 Annual Action Plan
- Attachment E: Summary Amendments to the Citizen Participation Plan

**PREPARED BY:** Maryann Sargent, Senior Housing Specialist, Community Development Department

DRAFT OF AMENDED FY 2019-2020 HUD Annual Action Plan: CDBG and HOME Funds							
CDBG FUNDS							
							TOTALS
<b>FY19-20 CDBG Grant</b>							<b>\$ 707,517</b>
Carryovers: repayment received in FY 18-19 of defaulted loan (\$300,000), unused prior year general administration and public service funds from FY 14-15 & FY 15-16 (\$64,991), and							\$ 364,991
(Carryovers continued) Unused prior year funds from ADA Transition Plan (FY 12-13, FY 13-14, FY 14-15, FY 17-18, FY 18-19)							\$ 508,840
Program Income from FY 18-19							\$ 35,424
CARES Act Stimulus (CDBG-CV)							\$ 451,972
<b>Total available for projects</b>							<b>\$ 2,068,744</b>
Project Name	Project Description	National Objective	Activity Eligibility	FY 2019-2020 Allocation	Amended Allocation (Public Svcs: Sum of Columns E + G)	Added Allocation to FY 2019-2020	
<b>PUBLIC SERVICES</b>							
CALICO - San Leandro Child Abuse Intervention Project	Provide family support services for children who have suffered abuse.	Low/Mod Income Clientele	Public service	\$ 22,000	\$ 22,000		
Davis Street Family Resource Center - Basic Needs Program	Provide food, clothing, childcare, job readiness training, medical clinic, and social services for low-income people.	Low/Mod Income Clientele	Public service	\$ 42,941	\$ 42,941		
SOS / Meals on Wheels - Meals Delivery Service to Homebound Seniors	Provide support services programs for low-income seniors.	Low/Mod Income Clientele	Public service	\$ 29,000	\$ 44,000	\$ 15,000	
Spectrum Community Services - San Leandro Senior Nutrition Program	Provide seniors with hot, nutritious meals in supportive settings.	Low/Mod Income Clientele	Public service	\$ 17,500	\$ 42,500	\$ 25,000	
Rental Assistance Program	Provide housing subsistence payments to prevent homelessness.	Low/Mod Income Clientele	Public service		\$ 451,972		
<b>Total Amount Available Under 15% Spending Cap</b>				<b>\$ 111,441</b>	<b>\$ 603,413</b>		
<b>GENERAL ADMINISTRATION &amp; PLANNING</b>							
General Administration		N/A	General admin	\$ 131,503	\$ 131,503		
Fair Housing	Provide fair housing services.	N/A	Public service	\$ 10,000	\$ 10,000		
<b>Total Amount Available Under 20% Spending Cap</b>				<b>\$141,503</b>	<b>\$ 141,503</b>		
<b>PUBLIC FACILITIES &amp; IMPROVEMENTS</b>							
Mandatory Section 108 Loan Repayment	Repay Section 108 Loan used to construct new Senior Center in accordance with Repayment Schedule provided by HUD.	Low/Mod Income Clientele	Public facility	\$ 187,414	\$ 187,414		
ADA Transition Plan for City Facilities	Complete architectural modifications to City facilities (City Hall, Halcyon Park, Main Library, Marina Community Center, Marina Park, Memorial Park, SL History Museum, SL Police Station, Stenzel Park, Washington Manor Library, & Washington Manor Park/Family Aquatic Center) to improve ADA accessibility.	Low/Mod Income Clientele	Public facility	\$ 123,849	\$ -		
Boys & Girls Club - Public Facility Renovations	Boy's and Girl's Club "Vision 2020" capital improvement campaign with the goal of a full renovation of the 28,500 square foot San Leandro public facility.	Low/Mod Income Clientele	Public facility	\$ 300,000	\$ 300,000		
Building Futures for Women and Children - San Leandro Shelter Repairs	San Leandro Homeless Shelter Repairs and ADA Accessibility Upgrades.	Low/Mod Income Clientele	Public facility	\$ 143,725	\$ 143,725		
<b>Total Amount Available for Public Facilities</b>				<b>\$ 754,988</b>	<b>\$ 631,139</b>		
<b>HOUSING ACTIVITIES</b>							
Single-Family Housing Rehabilitation Program	Provide Grants for minor home repairs to low- and very low-income homeowners	Low/Mod Income Clientele	Housing	\$ 100,000	\$ 100,000		
<b>Total Amount Available for Housing Activities</b>				<b>\$ 100,000</b>	<b>\$ 100,000</b>	<b>\$ 1,476,055</b>	
<b>Total CDBG Amount Available for Project Expenditures</b>				<b>Unallocated (E10 - G31):</b>		<b>\$ 592,689</b>	
<b>HOME FUNDS</b>							
<b>FY19-20 HOME Grant*</b>				<b>\$ 221,998</b>			
Carry over from Prior Years				\$ -			
<b>Total HOME Amount Available for Project Expenditures</b>				<b>\$ 221,998</b>			
Project Name	Project Description	National Objective	Activity Eligibility	Allocation			
Administration	Administrative expenses as per the cap specified in the regulations	N/A		\$ 12,763			
Acquisition/rehabilitation/new construction of rental projects		N/A	24 CRF 92.205	\$ 209,235			
<b>Total</b>				<b>\$ 221,998</b>			
*The FY 2019-2020 HOME funding amount decreased about 9% from last year's pro-rata share from the Alameda County HOME Consortium. The City's HOME allocation for this year and the past two fiscal years (FY17-18 and FY18-19), are being used to repay an allocation of the HOME Consortium construction loan funds pooled with other Alameda County jurisdictions provided to BRIDGE Housing for the construction of 115-unit Marea Alta and La Vereda residential developments on the San Leandro BART station parking lot site.							

**Attachment B:  
City of San Leandro Justification of Urgent Need**

The U. S. Department of Housing and Urban Development’s CDBG regulations require the following documentation to utilize CDBG funds under the Urgent Need National Objective. Further, the Urgent Need Certification must be provided to HUD with the Consolidated Plan/Annual Action Plan for the year of the Urgent Need activity(ies). This documentation and evidence the City certified that the CDBG activity was designed to address the urgent need must be maintained as part of the permanent CDBG records for the activity(ies).

**1. Describe the condition that was addressed, showing the nature and degree of seriousness of the threat it posed.**

The COVID-19 virus was first identified in Wuhan China in November 2019. First positive cases of the virus in the United States and in California were found in January 2020. As the virus started to spread globally, the World Health Organization (WHO) declared a COVID-19 pandemic on March 11, 2020. At that time, it had been identified in 113 countries.

On the date this Substantial Amendment was drafted (May 24, 2020), 92,721 California residents had tested positive, and 3,774 had died as a result of the virus. Of those, 2,760 were Alameda County residents (positive test), and 92 had lost their lives.<sup>1</sup>

The COVID-19 virus has had a devastating effect globally. It has caused businesses to close, jobs to be lost, finances to be stretched, and general feelings of anxiety and fear. With the City’s addition of an Urgent Need activity (allowing for the possible support for oversight and services and infrastructure dedicated to COVID-19 response), the City may address these needs when other resources are not available and needed by the Alameda County Department of Public Health.

**2. Information on the timing of the development of the serious condition.**

See above.

**3. Evidence that the grantee certified that the CDBG activity was designed to address the urgent need.**

The Urgent Need Certification will be made a part of the activity(ies) files as needed.

**4. Evidence confirming that the other financial resources to alleviate the need were not available.**

The availability of other financial resources will be reviewed and certification made as to availability prior to approving the use of CDBG, CDBG-CV, any other stimulus allocations to the City. The review and certification will be made part of the activity(ies) files.

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<sup>1</sup> California Department of Public Health, COVID-19 Updates, “COVID-19 by the Numbers” website: <https://www.cdph.ca.gov/Programs/CID/DCDC/Pages/Immunization/ncov2019.aspx#COVID-19%20by%20the%20Numbers> and Johns Hopkins University & Medicine, Coronavirus Resource Center website: <https://coronavirus.jhu.edu/us-map>.





***PUBLIC REVIEW DRAFT***

**AMENDMENT  
to the  
CONSOLIDATED PLAN  
NON-HOME FUNDS  
FY 2015-2019**

**CITY OF SAN LEANDRO  
*ALAMEDA COUNTY  
HOME CONSORTIUM***

***Review Period: June 2 to June 7, 2020***

Amended Language in red Times New Roman font, 12 point type.

## Executive Summary

### ES-05 Executive Summary – 24 CFR 91.200(c), 91.220(b)

#### 1. Introduction

In response to the Coronavirus Pandemic (COVID-19), the Coronavirus Aid, Relief, and Economic Security Act (CARES Act), Public Law 116-136 was adopted and authorized on March 27, 2020. As a result, the U.S. Department of Housing and Community Development (HUD) awarded the City of San Leandro \$451,972 in Community Development Block Grant-Coronavirus (CDBG-CV) funds to prevent, prepare for, and respond to COVID-19. The CARES Act allows for reimbursement of costs incurred prior to the date of enactment of this legislation in addition to removal of the spending caps normally in place for Public Services expenditures as long as those costs are in response to COVID-19. (Note that the removal of the Public Services expenditure caps are only allowed for the 2019-2020 and 2020-2021 Annual Action Plan Program Years.) Additionally, the CARES Act allows HUD to waive or specify alternative requirements to expedite distribution of funding in response to COVID-19. Soon after the signing of the CARES Act, HUD issued guidance that allows cities to shorten the public comment period for amending prior 5-Year Consolidated Plans or Annual Action Plans to maximize the use of CDBG and CDBG-CV funds allocated to entitlement jurisdictions. Note that specific administrative changes to Citizen Participation will be reflected in Amendments to the Citizen Participation Plan that will be proposed in tandem with this document.

On April 13, 2020, the City of San Leandro received a waiver that permits a reduced period for public noticing and public comment on this Substantial Amendment to the 5-Year Consolidated Plan for the period of July 1, 2015 to June 30, 2020. The City is taking this opportunity to re-allocate prior year unspent CDBG funds and program new stimulus funding, CDBG-CV, towards COVID-19 emergency services. The City may also allocate additional funds as they are available.

This Substantial Amendment to the San Leandro's 2015-2020 Consolidated Plan outlines the City's updated funding priority needs and goals projects to address COVID-19 related impacts. Additionally, it will identify how the City plans to use available funds to address COVID-19. The updated sections of this five year planning document necessary to allocate and appropriate these funds include:

- PR-05 Lead & Responsible Agencies
- PR-10 Consultation
- PR-15 Citizen Participation
- NA-05 Needs Assessment Overview

- MA-65 Hazard Mitigation
- SP-25 Priority Needs
- SP-35 Anticipated Resources
- SP-45 Goals

One final note on this Substantial Amendment, the Federal Register and final guidance from HUD has not been provided. This Substantial Amendment is drafted with the guidance from HUD available to date, including that the CDBG-CV funds allocated under the CARES Act must be used in preparation for, prevention of, and response to COVID-19. All CDBG-CV activities must still meet one of three National Objectives of the CDBG Program noted in the original five year Consolidated Plan document. The City of San Leandro is taking this opportunity to document COVID-19 as an additional National Objective: Urgent Need. In order to do this, an Urgent Need Certification must be provided to HUD with the five year Consolidated Plan and Annual Action Plan for the year of the Urgent Need activity(ies). Documentation and evidence the City certified that the CDBG activity was designed to address the urgent need must be maintained as part of the permanent CDBG records for the activity(ies).

#### **Summary of the objectives and outcomes identified in the Plan Needs Assessment Overview**

A tangential effort in this five year Consolidated Plan Substantial Amendment is to further define priorities that are currently identified generically as “Community Development Needs Goals” in the 2015-2020 plan documents. Those changes are noted in parenthesis below. The following bullet points summarize updates and/or new Priority Needs and Goals for COVID-19 response:

- Augmenting Homeless Assistance and Prevention Services
- Producing and Preserving Affordable Housing Opportunities
- Providing Enhanced Public Services (“Community Development Needs Goals” in 2015-2020 Consolidated Plan)
- Improving Public Facilities and Infrastructure (“Community Development Needs Goals” in 2015-2020 Consolidated Plan)
- Increasing Economic Development Opportunities (“Community Development Needs Goals” in 2015-2020 Consolidated Plan)

## The Process

### PR-05 Lead & Responsible Agencies - 91.200(b)

**1. Describe agency/entity responsible for preparing the Consolidated Plan and those responsible for administration of each grant program and funding source**

The following are the agencies/entities responsible for preparing the Consolidated Plan and those responsible for administration of each grant program and funding source.

Agency Role	Name	Department/Agency
Lead Agency	SAN LEANDRO	
CDBG & CDBG-CV Administrator	SAN LEANDRO	Community Development Department
HOPWA Administrator		
HOME Administrator		
HOPWA-C Administrator		

**Table 1– Responsible Agencies**

#### Narrative

The City of San Leandro is the Lead Agency for the United States Department of Housing & Urban Development (HUD) Community Development Block Grant (CDBG) Program. The City's Housing Specialist in the Community Development Department Housing Services Division is responsible for administering the CDBG program, which includes developing the Five-Year Consolidated Plan, Annual Action Plans, and Consolidated Annual Performance Evaluation Reports (CAPERs), and is the liaison to the Alameda County for matters related to the HOME Investment Partnerships (HOME program) (the City of San Leandro is a member of the Alameda County HOME Consortium).

#### Consolidated Plan Public Contact Information

**Maryann Sargent**

**Senior** Housing Specialist

City of San Leandro

Community Development Department

Housing Services Division

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San Leandro, CA 94577

510-577-6005

**MSargent@sanleandro.org**

## **PR-10 Consultation - 91.100, 91.110, 91.200(b), 91.300(b), 91.215(l) and 91.315(l)**

### **1. Introduction**

This section of the Consolidated Plan documents the interagency coordination, consultation, and public participation that informs the Substantial Amendment to five year Consolidated Plan. Those consultations began once the City complied with the Alameda County Shelter-In-Place order issued on March 16, 2020. City staff, including the City's Office of Emergency Management staff, have been in frequent consultation with the Alameda County Department of Public Health to consult on the nature of the need in the County for which CDBG-CV funds are to be used. Additionally, non-profit agencies currently operating homeless shelters and providing services San Leandro's low-moderate-income residents have been consulted to determine the highest and best needs for the CDBG-CV funds.

## **PR-15 Citizen Participation - 91.105, 91.115, 91.200(c) and 91.300(c)**

### **1. Summary of citizen participation process/Efforts made to broaden citizen participation Summarize citizen participation process and how it impacted goal-setting**

As noted earlier, On April 13, 2020, the City of San Leandro received a waiver that permits a reduced period for public noticing and public comment on this Substantial Amendment to the 5-Year Consolidated Plan for the period of July 1, 2015 to June 30, 2020. The City is taking this opportunity to re-allocate prior year unspent CDBG funds and program new stimulus funding, CDBG-CV, towards COVID-19 emergency services. The City may also allocate additional funds as they are available.

The draft Substantial Amendment to the 2015-2020 Consolidated Plan will be available for comment from all interested parties from June 2, 2020 to June 7, 2020. Due to the Alameda County Shelter-In-Place Order these amendment documents shall only be available for review on the City's website (<http://www.sanleandro.org/depts/cd/housing/plans.asp>) or the Library website (<https://www.sanleandro.org/depts/library/default.asp>).

The needs in this document were derived from preliminary data from the impacts of COVID-19 which indicate significant unmet needs in many areas of potential CDBG and CDBG-CV funding categories. The City of San Leandro is considering the following eligible activities for this funding for current and/or future funding that may become available: assisting low- and moderate-income households with housing rental assistance for no more than three months, food pantry/distribution/delivery meal programs, business assistance (technical assistance, financial support to microenterprises or funding to retain employees that are low- and moderate-income), and support of other COVID-19 response services.

#### **Submitting Public Comment:**

Please submit written comments to [MSargent@sanleandro.org](mailto:MSargent@sanleandro.org).

Comments may also be mailed to:

City of San Leandro  
Housing and Community Development Department  
835 East 14<sup>th</sup> Street  
San Leandro CA, 94577  
Attn: Maryann Sargent, Senior Housing Specialist

# Needs Assessment

## NA-05 Overview

### Needs Assessment Overview

The needs identified in the original Consolidated Plan focused on affordable housing needs, the needs of homeless citizens, and community development (including possibly funding public facilities and infrastructure, public services, and economic development activities). A tangential effort in this five year Consolidated Plan Substantial Amendment is to further define priorities that are currently identified generically as “Community Development Needs Goals” in the 2015-2020 plan documents. Those changes are noted in parenthesis below. The following bullet points summarize updates and/or new Priority Needs and Goals for COVID-19 response:

- Augmenting Homeless Assistance and Prevention Services
- Producing and Preserving Affordable Housing Opportunities
- Providing Enhanced Public Services (“Community Development Needs Goals” in 2015-2020 Consolidated Plan)
- Improving Public Facilities and Infrastructure (“Community Development Needs Goals” in 2015-2020 Consolidated Plan)
- Increasing Economic Development Opportunities (“Community Development Needs Goals” in 2015-2020 Consolidated Plan)

As a result of shortages in some areas, combined with loss of income for many households, there has been substantial increase in demand for assistance through public services, especially food banks, meal delivery services, healthcare-related services including for mental health services and support for- and prevention of- domestic violence services. The rapid increase in demand has left many service providers under-staffed and under-resourced and has added substantial cost. The increased demand is expected to be sustained beyond the shut-down as households will take time to regain employment and economic stability.

Homelessness response and homelessness prevention has also risen in priority. Many households have been unable to pay rent since the shut-down and shelter-in-place orders were issued in early March 2020. While the City of San Leandro adopted a moratoriums on evictions on March 23, 2020, housing costs are still a major concern, particularly for lower-income households who may be at risk of homelessness once the moratorium is lifted. Homelessness prevention must be a community priority to prevent increase in homelessness as housing protections are lifted. Persons already experiencing homelessness are also at increased risk of infection and death due to COVID-19. Congregate shelters are not a viable housing solution in a pandemic, and persons experiencing homelessness need access to safe shelter to prevent infection and spread of the disease.

Public facilities that support healthcare or that provide safe housing for persons experiencing homelessness also are prioritized. The demand on the healthcare facilities for increased capacity has already been experienced in urban areas of the nation, and smaller and rural communities risk having their limited healthcare facilities over capacity during the viral surge. Both temporary and permanent capacity building for healthcare and homeless facilities are priorities.

The ongoing shut-down of businesses has resulted in record unemployment, which severely impacts areas with a higher cost of living and areas already impacted by higher poverty rates. Small businesses have been especially impacted as many do not have the working capital to weather months of mandated shut-down while maintaining payrolls and employment benefits. The need for business support is increasing as the shut-down continues.



## MA-65 Hazard Mitigation - 91.210(a)(5), 91.310(a)(3)

**Describe the jurisdiction’s increased natural hazard risks associated with climate change.**

San Leandro is located on the shoreline of the San Francisco Bay and sits at an average elevation of 56 feet. Located between Oakland and Hayward with a population of about 88,000 people, it is highly urbanized, made up of residential properties with industrial and manufacturing uses in the west, mixed use areas in the southern portions of the city, and the downtown core to the northeast. Due to its geographic span from the Bay into the hills, San Leandro is susceptible to a variety of climate hazards. San Leandro will likely be most affected by the combination of sea level rise, high tides and flooding along the shoreline and throughout the southwest portion of the city, which threaten to limit mobility and damage amenities and industry that are important to San Leandro and the regional economy. However, the most severe impacts will be seen in the long-term, when projected temperature increases and the frequency of very hot days will impact a broader set of the city’s assets and population, resulting in greater occurrence of heat related illness.

**Describe the vulnerability to these risks of housing occupied by low- and moderate-income households based on an analysis of data, findings, and methods.**

### Disease Outbreaks

The COVID-19 virus was first identified in Wuhan China in November 2019. First positive cases of the virus in the United States and in California were found in January 2020. As the virus started to spread globally, the World Health Organization (WHO) declared a COVID-19 pandemic on March 11, 2020. At that time, it had been identified in 113 countries.

On the date this Substantial Amendment was drafted (May 24, 2020), the State of California reported 92,721 confirmed cases of residents who had tested positive for COVID-19, with 3,774 who had died as a result of the virus. Of those, 2,760 Alameda County residents tested positive for COVID-19 with 92 who had lost their lives.<sup>1</sup>

The COVID-19 virus has had a devastating effect globally. It has caused businesses to close, jobs to be lost, finances to be stretched, and general feelings of anxiety and fear. Given this, the City’s seeks to have the option of using the National Objective of “Urgent Need” to allow for the possible support for oversight and services and infrastructure dedicated to COVID-19 response.

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<sup>1</sup> California Department of Public Health, COVID-19 Updates, “COVID-19 by the Numbers” website: <https://www.cdph.ca.gov/Programs/CID/DCDC/Pages/Immunization/ncov2019.aspx#COVID-19%20by%20the%20Numbers> and Johns Hopkins University & Medicine, Coronavirus Resource Center website: <https://coronavirus.jhu.edu/us-map>.

The City may address these needs when other resources are not available and needed by the Alameda County Department of Public Health.

Low- and moderate-income communities are more vulnerable to disease outbreaks than higher-income communities because of their limited access to health care providers, and the fact that being a member of a vulnerable population is associated with being immunocompromised and more vulnerable to infectious disease. California's governor has requested emergency action from the state Legislature to make funding available for the public response to the outbreak. While the eventual impact of the COVID-19 outbreak is unclear at this stage, it serves as a warning that these events may increase in frequency and severity in coming years.

## SP-25 Priority Needs - 91.415, 91.215(a)(2)

### Priority Needs

Table 2 – Priority Needs Summary

<b>1</b>	<b>Priority Need Name</b>	Affordable Housing Needs
	<b>Priority Level</b>	High
	<b>Population</b>	Extremely Low Low Moderate Large Families Families with Children Elderly Chronic Homelessness Individuals Families with Children
	<b>Geographic Areas Affected</b>	City-Wide
	<b>Associated Goals</b>	Affordable Housing Needs Goals
	<b>Description</b>	<p>To address the need for affordable housing in the City, the City proposes to take the following actions:</p> <ul style="list-style-type: none"> <li>• Increase the availability of affordable rental housing for extremely low- (30% AMI), very low- (50% AMI), and low-income (80% AMI) households.</li> <li>• Preserve existing affordable rental housing for households at or below 80% Area Median Income (AMI).</li> <li>• Preserve existing ownership for households at or below 80% Area Median Income (AMI).</li> <li>• Assist low- and moderate-income first-time homebuyers.</li> <li>• Reduce housing discrimination.</li> </ul>
	<b>Basis for Relative Priority</b>	Documented lack of affordable rental housing in the Alameda County HOME Consortium area. The City historically allocated and will continue allocate CDBG funds primarily to provide fair housing services and preserve affordable housing and HOME funds to potential affordable rental or ownership housing projects, including new construction or acquisition and rehabilitation.

2	<b>Priority Need Name</b>	Homeless Needs
	<b>Priority Level</b>	High
	<b>Population</b>	Extremely Low Low Moderate Large Families Families with Children Elderly Chronic Homelessness Individuals Families with Children Elderly Persons with Physical Disabilities
	<b>Geographic Areas Affected</b>	City-Wide
	<b>Associated Goals</b>	Homelessness Needs Goals
	<b>Description</b>	To address the homelessness needs of the City, the City will continue to support homeless-serving activities that: <ul style="list-style-type: none"> <li>• Maintain, improve, and expand (as needed) the capacity of housing, shelter, and services for homeless individuals and families including integrated healthcare, employment services, and other services.</li> <li>• Maintain and expand activities designed to prevent those currently housed from becoming homeless.</li> <li>• Build on inter-jurisdictional cooperation to achieve housing and homeless needs.</li> </ul>
	<b>Basis for Relative Priority</b>	Reducing homelessness is a high priority for the City and the Alameda County HOME Consortium.
3	<b>Priority Need Name</b>	Supportive Housing Needs
	<b>Priority Level</b>	Low

	<b>Population</b>	Extremely Low Elderly Elderly Frail Elderly Persons with Mental Disabilities Persons with Physical Disabilities Persons with Developmental Disabilities
	<b>Geographic Areas Affected</b>	City-Wide
	<b>Associated Goals</b>	Supportive Housing Needs Goals
	<b>Description</b>	The City intends to support future transitional or permanent supportive housing projects that will serve San Leandro residents with special needs, which includes persons with physical or mental disabilities and seniors who need affordable housing integrated with available support services.
	<b>Basis for Relative Priority</b>	Many of the homeless population also have supportive services needs. The City have primarily used available HOME funds for any future transitional or permanent supportive housing projects that will serve San Leandro residents with special needs. However, due to the consistently declining funding level for the HOME program, the City is unable to prioritize supportive housing needs hence the low priority level.
4	<b>Priority Need Name</b>	Community Development Needs - Public Services
	<b>Priority Level</b>	High

	<b>Population</b>	Extremely Low Low Large Families Families with Children Elderly Chronic Homelessness Individuals Families with Children Mentally Ill Chronic Substance Abuse veterans Persons with HIV/AIDS Victims of Domestic Violence Elderly Frail Elderly Persons with Mental Disabilities Persons with Physical Disabilities Persons with Developmental Disabilities Persons with Alcohol or Other Addictions Persons with HIV/AIDS and their Families Victims of Domestic Violence
	<b>Geographic Areas Affected</b>	City-Wide
	<b>Associated Goals</b>	Community Development Needs Goals
	<b>Description</b>	The City will continue to provide program operational grants to non-profit social services providers serving San Leandro residents. The types of services considered priorities for City funding include social and health services for low-income women, children, and families in crisis; seniors; persons with disabilities; shelter programs; tenant-landlord counseling; and fair housing.
	<b>Basis for Relative Priority</b>	The City has prioritized allocating CDBG funds towards the operational funding for the non-profit social services providers serving San Leandro residents as assisting San Leandro residents in need is a top priority for the City.
5	<b>Priority Need Name</b>	Community Development Needs - Public Facilities
	<b>Priority Level</b>	High

	<b>Population</b>	Extremely Low Low Large Families Families with Children Elderly Chronic Homelessness Individuals Families with Children Elderly Frail Elderly Persons with Physical Disabilities
	<b>Geographic Areas Affected</b>	City-Wide
	<b>Associated Goals</b>	Community Development Needs Goals
	<b>Description</b>	The City's capital improvement projects include accessibility improvements to public facilities, installing wheelchair curb ramps throughout the City, and assisting non-profit social service agencies serving San Leandrans with necessary facility improvements.  The City will also continue to make principal and interests payments for the \$2.5 million HUD Section 108 Loan the City used to construct the senior community center.
	<b>Basis for Relative Priority</b>	One of the City's top and high priority is using CDBG funds to both fund ADA improvements and to repay the City's HUD Section 108 Loan. Improving the quality of life in the neighborhoods is a also top priority for the City.
6	<b>Priority Need Name</b>	Community Development Needs - Economic Development
	<b>Priority Level</b>	Low
	<b>Population</b>	Non-housing Community Development
	<b>Geographic Areas Affected</b>	City-Wide
	<b>Associated Goals</b>	Community Development Needs Goals

	<b>Description</b>	If funding is available, the City may potentially seek to provide loans to eligible small businesses for property upgrades, and if the need arises, to develop and implement a neighborhood strategy or plan that includes commercial revitalization.
	<b>Basis for Relative Priority</b>	Increased income can improve and increase the quality of life for San Leandro residents. However, due to inadequate CDBG funding, the City is unable to prioritize economic development hence the low priority level.
7	<b>Priority Need Name</b>	Administration
	<b>Priority Level</b>	High
	<b>Population</b>	Other
	<b>Geographic Areas Affected</b>	City-Wide
	<b>Associated Goals</b>	Affordable Housing Needs Goals Community Development Needs Goals Homelessness Needs Goals Supportive Housing Needs Goals
	<b>Description</b>	The City will continue to allocate 20% of its annual CDBG entitlement fund amount to the administration of the City's CDBG program and to fair housing services that affirmatively further fair housing.
	<b>Basis for Relative Priority</b>	The City considers it a high priority to ensure that the CDBG program is administered in accordance to the CDBG program regulations and to ensure the City continues to affirmatively further fair housing throughout the City.
8	<b>Priority Need Name</b>	<b>COVID-19 Pandemic Response (CARES Act)</b>
	<b>Priority Level</b>	<b>High</b>
	<b>Population</b>	<b>Income Level: Extremely Low- and Low-Income</b> <b>Non-homeless Special Needs: Elderly, Frail Elderly, Persons with Mental Disabilities, Persons with Physical Disabilities, Persons with Developmental Disabilities, Persons with Alcohol or Other Addictions, Victims of Domestic Violence</b> <b>Homeless: Chronic Homelessness, Individuals, Families with Children, Mentally Ill, Chronic Substance Abuse, Veterans, Victims of Domestic Violence, Unaccompanied Youth</b>



<b>Geographic Areas Affected</b>	City-Wide
<b>Associated Goals</b>	<p>Augmenting Homeless Assistance and Prevention Services</p> <p>Producing and Preserving Affordable Housing Opportunities</p> <p>Providing Enhanced Public Services (“Community Development Needs Goals” in 2015-2020 Consolidated Plan)</p> <p>Improving Public Facilities and Infrastructure (“Community Development Needs Goals” in 2015-2020 Consolidated Plan)</p> <p>Increasing Economic Development Opportunities (“Community Development Needs Goals” in 2015-2020 Consolidated Plan)</p>
<b>Description</b>	<p>In March of 2020 the Coronavirus pandemic began to impact U.S. communities and projections indicated that elderly, persons with underlying health conditions, and persons without access to housing were at particular risk of infection and death. Communities across the nation, including the State of California, initiated Shelter in Place Orders that encouraged non-essential workers to shelter in their homes, and that shut down all non-essential businesses.</p>
<b>Basis for Relative Priority</b>	<p>Impacts from the pandemic are expected to spread from health risks from homelessness, needs for additional housing to support persons experiencing homelessness in providing non-congregate shelters to prevent the spread of COVID-19. Additionally, the Shelter-in-Place Orders resulted in mass business shut-downs during the term of the order. The shutdowns impacted non-essential services and resulted in record unemployment. Essential businesses need assistance in preserving jobs during the shelter-in-place order. Businesses that have shut down will need support in re-opening and ramping back up into full operations, including both job retention and job creation efforts.</p>

## SP-35 Anticipated Resources - 91.420(b), 91.215(a)(4), 91.220(c)(1,2)

### Introduction

This section provides a brief description of the federal CDBG and HOME funds available to implement the City's FY 2015-2016 Annual Action Plan, which outlines the first year of the FY 2015-2019 Consolidated Plan.

### Anticipated Resources

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
CDBG	public - federal	Acquisition Admin and Planning Economic Development Housing Public Improvements Public Services	628,306	0	0	628,306	2,513,224	As a CDBG entitlement locality, the City of San Leandro directly receives CDBG funds annually from the U.S. Department of Housing and Urban Development (HUD). CDBG funds can be used for a variety of housing and community development activities which benefit lower income individuals and families.

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
Other	public - federal	Acquisition Admin and Planning Housing Other	0	0	0	0	0	The City of San Leandro receives HOME funds via a formula allocation through the Alameda County HOME Consortium. The HOME Program provides flexible funding to states and local governments for affordable housing programs and activities for low-income households. HOME funds can be used to acquire, rehabilitate, and construct affordable housing, as well as to provide tenant-based rental assistance or homebuyer assistance or homeowner rehabilitation for income-eligible individuals and families.
CDBG-CV	public - federal	Acquisition Admin and Planning Economic Development Housing Public Improvements Public Services	\$451,972	0	0	0	\$451,972	One time award of funds – March 2020

Table 3 - Anticipated Resources

**Explain how federal funds will leverage those additional resources (private, state and local funds), including a description of how matching requirements will be satisfied**

Not applicable.

**If appropriate, describe publically owned land or property located within the state that may be used to address the needs identified in the plan**

Not applicable.

**Discussion**

None.

## SP-45 Goals - 91.415, 91.215 (a)(4)

### Goals Summary Information

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
1	Affordable Housing Needs Goals	2015	2019	Affordable Housing	City-Wide	Administration Affordable Housing Needs	CDBG: \$500,000	Public service activities for Low/Moderate Income Housing Benefit: 50 Households Assisted  Homeowner Housing Rehabilitated: 75 Household Housing Unit  Other: 1 Other
2	Homelessness Needs Goals	2015	2019	Homeless	City-Wide	Administration Homeless Needs	CDBG: \$0	Other: 0 Other
3	Supportive Housing Needs Goals	2015	2019	Non-Homeless Special Needs	City-Wide	Administration Supportive Housing Needs	CDBG: \$0	Other: 0 Other

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
4	Community Development Needs Goals- <b>Providing Enhanced Public Services</b>	2015	2019	Non-Housing Community Development	City-Wide	<del>Administration Community Development Needs- Economic Development Community Development Needs- Public Facilities Community Development Needs - Public Services</del>	CDBG: \$2,063,225	Public service activities other than Low/Moderate Income Housing Benefit: 50000 Persons Assisted  Other: 7 Other
5	Community Development Needs Goals- <b>Improving Public Facilities and Infrastructure</b>	2015	2019	Non-Housing Community Development	City-Wide	<b>Community Development Needs - Public Facilities</b>	CDBG:	<b>Public service activities other than Low/Moderate Income Housing Benefit: 50000 Persons Assisted  Other: 7 Other</b>
6	Community Development Needs Goals- <b>Increasing Economic Development Opportunities</b>	2015	2019	Non-Housing Community Development	City-Wide	<b>Community Development Needs - Economic Development</b>	CDBG:	<b>Public service activities other than Low/Moderate Income Housing Benefit: 50000 Persons Assisted  Other: 7 Other</b>

Table 4 – Goals Summary

## Goal Descriptions

1	<b>Goal Name</b>	Affordable Housing Needs Goals
	<b>Goal Description</b>	These are the City's proposed activities and targeted outcomes to achieve its Affordable Housing Needs Goals.
2	<b>Goal Name</b>	Homelessness Needs Goals
	<b>Goal Description</b>	These are the City's proposed activities and targeted outcomes to achieve its Homelessness Needs Goals.
3	<b>Goal Name</b>	Supportive Housing Needs Goals
	<b>Goal Description</b>	These are the City's proposed activities and targeted outcomes to achieve its Supportive Housing Needs Goals.
4	<b>Goal Name</b>	Community Development Needs Goals- <del>Providing Enhanced Public Services</del>
	<b>Goal Description</b>	These are the City's proposed activities and targeted outcomes to achieve its Community Development Needs Goals, which include <del>economic development, providing enhanced public services, and public facilities and improvements.</del>
5	<b>Goal Name</b>	<b>Community Development Needs Goals-Improving Public Facilities and Infrastructure</b>
	<b>Goal Description</b>	These are the City's proposed activities and targeted outcomes to achieve its Community Development Needs Goals, which include <b>improving public facilities and infrastructure.</b>
6	<b>Goal Name</b>	<b>Community Development Needs Goals-Increasing Economic Development Opportunities</b>
	<b>Goal Description</b>	These are the City's proposed activities and targeted outcomes to achieve its Community Development Needs Goals, which include <b>increasing economic development opportunities.</b>

**Estimate the number of extremely low-income, low-income, and moderate-income families to whom the jurisdiction will provide affordable housing as defined by HOME 91.315(b)(2)**

Not applicable.







***PUBLIC REVIEW DRAFT***

**AMENDMENT  
to the  
ANNUAL ACTION PLAN  
NON-HOME FUNDS  
FY 2019-2020**

**CITY OF SAN LEANDRO  
*ALAMEDA COUNTY  
HOME CONSORTIUM***

***Review Period: June 2 to June 7, 2020***

Amended Language in red Times New Roman font, 12 point type.

## Executive Summary

### AP-05 Executive Summary - 91.200(c), 91.220(b)

#### 1. Introduction

In response to the Coronavirus Pandemic (COVID-19), the Coronavirus Aid, Relief, and Economic Security Act (CARES Act), Public Law 116-136 was adopted and authorized on March 27, 2020. As a result, the U.S. Department of Housing and Community Development (HUD) awarded the City of San Leandro \$451,972 in Community Development Block Grant-Coronavirus (CDBG-CV) funds to prevent, prepare for, and respond to COVID-19. The CARES Act allows for reimbursement of costs incurred prior to the date of enactment of this legislation in addition to removal of the spending caps normally in place for Public Services expenditures as long as those costs are in response to COVID-19. (Note that the removal of the Public Services expenditure caps are only allowed for the 2019-2020 and 2020-2021 Annual Action Plan Program Years.) Additionally, the CARES Act allows HUD to waive or specify alternative requirements to expedite distribution of funding in response to COVID-19. Soon after the signing of the CARES Act, HUD issued guidance that allows cities to shorten the public comment period for amending prior 5-Year Consolidated Plans or Annual Action Plans to maximize the use of CDBG and CDBG-CV funds allocated to entitlement jurisdictions. Note that specific administrative changes to Citizen Participation will be reflected in Amendments to the Citizen Participation Plan that will be proposed in tandem with this document.

On April 13, 2020, the City of San Leandro received a waiver that permits a reduced period for public noticing and public comment on this amendment to the 2019-2020 Annual Action Plan for the period of July 1, 2019 to June 30, 2020. The City is taking this opportunity to re-allocate prior year unspent CDBG funds and program new stimulus funding, CDBG-CV, towards COVID-19 emergency services. The City may also allocate additional funds as they are available.

This amendment to the San Leandro's 2019-2020 Annual Action Plan summarizes Citizen Participation and Public Comment and expected resources to address COVID-19 related impacts. Additionally, it will identify how the City plans to use available funds by updating its annual goals and objectives and the related projects targeted for funding to address COVID-19. The updated sections of this annual planning document necessary to implement these changes to allocations and appropriations of these funds include:

- Summary of Citizen Participation
- AP-10 Consultation

- AP-12 Participation
- AP-15 Expected Resources
- AP-20 Annual Goals and Objectives
- AP-35 Projects
- AP-38 Project Summary

One final note on this Substantial Amendment, the Federal Register and final guidance from HUD has not been provided. This Substantial Amendment is drafted with the guidance from HUD available to date, including that the CDBG-CV funds allocated under the CARES Act must be used in preparation for, prevention of, and response to COVID-19. All CDBG-CV activities must still meet one of three National Objectives of the CDBG Program noted in the original five year Consolidated Plan document. The City of San Leandro is taking this opportunity to document COVID-19 as an additional National Objective: Urgent Need. In order to do this, an Urgent Need Certification must be provided to HUD with the five year Consolidated Plan and Annual Action Plan for the year of the Urgent Need activity(ies). Documentation and evidence the City certified that the CDBG activity was designed to address the urgent need must be maintained as part of the permanent CDBG records for the activity(ies).

#### **Summary of Citizen Participation Process and consultation process**

As noted earlier, On April 13, 2020, the City of San Leandro received a waiver that permits a reduced period for public noticing and public comment on this Substantial Amendment to the Annual Action Plan for the period of July 1, 2019 to June 30, 2020. The City is taking this opportunity to re-allocate prior year unspent CDBG funds and program new stimulus funding, CDBG-CV, towards COVID-19 emergency services. The City may also allocate additional funds as they are available.

The draft Substantial Amendment to the 2019-2020 Annual Action Plan will be available for comment from all interested parties from June 2, 2020 to June 7, 2020. Due to the Alameda County Shelter-In-Place Order these amendment documents shall only be available for review on the City's website (<http://www.sanleandro.org/depts/cd/housing/plans.asp>) or the Library website (<https://www.sanleandro.org/depts/library/default.asp>).

The needs in this document were derived from preliminary data from the impacts of COVID-19 which indicate significant unmet needs in many areas of potential CDBG and CDBG-CV funding categories. The City of San Leandro is considering the following eligible activities for this funding for current and/or future funding that may become available: assisting low- and moderate-income households with housing rental assistance for no more than three months, food pantry/distribution/delivery meal programs, business assistance (technical assistance, financial

support to microenterprises or funding to retain employees that are low- and moderate-income), and support of other COVID-19 response services.

**Submitting Public Comment:**

Please submit written comments to [MSargent@sanleandro.org](mailto:MSargent@sanleandro.org)

Comments may also be mailed to:

City of San Leandro  
Housing and Community Development Department  
835 East 14<sup>th</sup> Street  
San Leandro CA, 94577  
Attn: Maryann Sargent, Senior Housing Specialist

**PR-05 Lead & Responsible Agencies - 91.200(b)**

**1. Agency/entity responsible for preparing/administering the Consolidated Plan**

The following are the agencies/entities responsible for preparing the Consolidated Plan and those responsible for administration of each grant program and funding source.

<b>Agency Role</b>	<b>Name</b>	<b>Department/Agency</b>
Lead Agency	SAN LEANDRO	
CDBG & CDBG-CV Administrator	SAN LEANDRO	Community Development Department
HOPWA Administrator		
HOME Administrator		
HOPWA-C Administrator		

**Table 1 – Responsible Agencies**

**Narrative**

**Consolidated Plan Public Contact Information**

Maryann Sargent, Senior Housing Specialist  
 City of San Leandro  
 Community Development Department  
 Housing Services Division  
 835 East 14th Street  
 San Leandro, CA 94577  
 Office: 510.577.6005  
 Fax: 510.577.6007  
 msargent@sanleandro.org

## **AP-10 Consultation - 91.100, 91.200(b), 91.215(l)**

### **1. Introduction**

This section of this Annual Action Plan documents the interagency coordination, consultation, and public participation that informs the Substantial Amendment to five year Consolidated Plan. Those consultations began once the City complied with the Alameda County Shelter-In-Place order issued on March 16, 2020. City staff, including the City's Office of Emergency Management staff, have been in frequent consultation with the Alameda County Department of Public Health to consult on the nature of the need in the County for which CDBG-CV funds are to be used. Additionally, non-profit agencies currently operating homeless shelters and providing services San Leandro's low-moderate-income residents have been consulted to determine the highest and best needs for the CDBG-CV funds.

## **AP-12 Participation - 91.401, 91.105, 91.200(c)**

### **1. Summary of citizen participation process/Efforts made to broaden citizen participation Summarize citizen participation process and how it impacted goal-setting**

As noted earlier, On April 13, 2020, the City of San Leandro received a waiver that permits a reduced period for public noticing and public comment on this Substantial Amendment to the Annual Action Plan for the period of July 1, 2019 to June 30, 2020. The City is taking this opportunity to re-allocate prior year unspent CDBG funds and program new stimulus funding, CDBG-CV, towards COVID-19 emergency services. The City may also allocate additional funds as they are available.

The draft Substantial Amendment to the 2019-2020 Annual Action Plan will be available for comment from all interested parties from June 2, 2020 to June 7, 2020. Due to the Alameda County Shelter-In-Place Order these amendment documents shall only be available for review on the City's website (<http://www.sanleandro.org/depts/cd/housing/plans.asp>) or the Library website (<https://www.sanleandro.org/depts/library/default.asp>).

The needs in this document were derived from preliminary data from the impacts of COVID-19 which indicate significant unmet needs in many areas of potential CDBG and CDBG-CV funding categories. The City of San Leandro is considering the following eligible activities for this funding for current and/or future funding that may become available: assisting low- and moderate-income households with housing rental assistance for no more than three months, food pantry/distribution/delivery meal programs, business assistance (technical assistance, financial support to microenterprises or funding to retain employees that are low- and moderate-income), and support of other COVID-19 response services.

## Expected Resources

### AP-15 Expected Resources - 91.420(b), 91.220(c)(1,2)

#### Introduction

In response to the Coronavirus Pandemic (COVID-19), the Coronavirus Aid, Relief, and Economic Security Act (CARES Act), Public Law 116-136 was adopted and authorized on March 27, 2020. As a result, the U.S. Department of Housing and Community Development (HUD) awarded the City of San Leandro \$451,972 in Community Development Block Grant-Coronavirus (CDBG-CV) funds to prevent, prepare for, and respond to COVID-19.



## Anticipated Resources

In addition to prior year unused funds identified in the FY 19-20 Annual Action Plan in the amount of \$364,991 there were additional unused prior year funds that had been allocated to the ADA Transition Plan since FY 12-13 (specifically the following fiscal years: 12-13, 13-14, 14-15, 17-18, and 18-19). As of the beginning date of this Annual Action Plan Program Year (July 1, 2019) the City of San Leandro has unspent and reserved for the ADA Transition Plan \$508,840. Given the gravity of need and the ability to do so under the auspices of the CARES Act, the City plans to use a portion of these funds to address public service needs in response to COVID-19. The total amount of available prior year resources amount to \$873,831. After all of the funding recommendations for the FY 2019-2020 Annual Action Plan Substantial Amendment are adopted, there will be a total of \$476,189 unallocated.

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
CDBG	public - federal	Acquisition Admin and Planning Economic Development Housing Public Improvements Public Services	707,517	35,424	<del>364,991</del> \$873,831 (\$364,991 + \$508,840)	<del>1,107,932</del> \$1,616,772	<del>1,107,932</del> \$1,616,772	As a CDBG entitlement locality, San Leandro directly receives CDBG funds annually from the U.S. Department of Housing and Urban Development (HUD). CDBG funds can be used for a variety of housing and community development activities that benefit lower income individuals and families.

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
Other	public - federal	Acquisition Admin and Planning Housing Other	0	0	0	0	0	The City of San Leandro receives HOME funds via a formula allocation through the Alameda County HOME Consortium. The HOME Program provides flexible funding to states and local governments for affordable housing programs and activities for low-income households. HOME funds can be used to acquire, rehabilitate, and construct affordable housing, as well as to provide tenant-based rental assistance or homebuyer assistance or homeowner rehabilitation for income-eligible individuals and families.
CDBG-CV	public - federal	Acquisition Admin and Planning Economic Development Housing Public Improvements Public Services	\$451,972	0	0	\$451,972	0	One time award of funds – March 2020

Table 2 - Expected Resources – Priority Table

## Annual Goals and Objectives

### AP-20 Annual Goals and Objectives - 91.420, 91.220(c)(3)&(e)

#### Goals Summary Information

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
1	Affordable Housing Needs Goals	2015	2019	Affordable Housing	City-Wide	Affordable Housing Needs	CDBG: \$110,000	Public service activities other than Low/Moderate Income Housing Benefit: 10 Persons Assisted Homeowner Housing Rehabilitated: 15 Household Housing Unit
2	Homelessness Needs Goals	2015	2019	Homeless	City-Wide	Administration Homeless Needs	CDBG: \$0	Homeless Person Overnight Shelter: 200 Persons Assisted Homelessness Prevention: 215 Persons Assisted Other: 0 Other
3	Supportive Housing Needs Goals	2015	2019	Non-Homeless Special Needs	City-Wide	Supportive Housing Needs	CDBG: \$0	Other: 0 Other

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
4	Community Development Needs Goals- <b>Providing Enhanced Public Services</b>	2015	2019	Non-Housing Community Development	City-Wide	Community Development Needs – Economic Development Community Development Needs – Public Facilities Community Development Needs - Public Services	CDBG: \$151,441 <del>\$111,441</del> CDBG-CV: \$451,972	
5	Community Development Needs Goals-Improving Public Facilities and Infrastructure	2015	2019	Non-Housing Community Development	City-Wide	Community Development Needs - Public Facilities	CDBG: \$631,139 <del>\$754,988</del>	
6	Community Development Needs Goals-Increasing Economic Development Opportunities	2015	2019	Non-Housing Community Development	City-Wide	Community Development Needs – Economic Development		

Table 3 – Goals Summary

## Goal Descriptions

1	<b>Goal Name</b>	Affordable Housing Needs Goals
	<b>Goal Description</b>	
2	<b>Goal Name</b>	Homelessness Needs Goals
	<b>Goal Description</b>	
3	<b>Goal Name</b>	Supportive Housing Needs Goals
	<b>Goal Description</b>	
4	<b>Goal Name</b>	Community Development Needs Goals – Providing Enhanced Public Services
	<b>Goal Description</b>	
5	<b>Goal Name</b>	Community Development Needs Goals-Improving Public Facilities and Infrastructure
	<b>Goal Description</b>	
6	<b>Goal Name</b>	Community Development Needs Goals-Increasing Economic Development Opportunities
	<b>Goal Description</b>	

## AP-35 Projects - 91.420, 91.220(d)

### Introduction

CDBG funds can be used for four (4) general types of projects: housing, capital projects, economic development, and public services. All projects must meet at least one (1) of HUD's national objectives: 1) to benefit low/moderate-income people; 2) to prevent or eliminate slums and blight; and 3) to meet an urgent community development need.

Even if a project is suitable for one of the City's eligible categories, it must also pass the low- and moderate-income benefit test. A project meets this standard if at least 51% of the beneficiaries have low-moderate incomes (i.e., incomes at or below 80% of Area Median Income) or if the project benefits an area (e.g., census tracts, service area, neighborhood, etc.) with a majority of low-moderate income people. Funded projects are required to document the income levels of persons and households receiving these services.

After assessing the City's housing and community development priority needs, evaluating the Five-Year Strategic Plan objectives for FY 2015-2019, and analyzing CDBG eligibility criteria, the City is proposing to allocate its available CDBG dollars in the following eligible funding categories: Public Services, Public Facilities, Housing Activities, and General Administration.

San Leandro allocates its annual federal CDBG and HOME funds to address the City's housing and community development needs identified in the City's FY 2015-2019 Five-Year Consolidated Plan.

#	Project Name
1	CDBG Program Administration
2	ECHO Housing - Fair Housing Program
3	Section 108 Loan Repayment
4	ADA Transition Plan for City Facilities
5	Single-Family Housing Rehabilitation Program
6	CALICO - San Leandro Child Abuse Intervention Project
7	Davis Street Family Resource Center's Family Support Services - Basic Needs Program
8	SOS/Meals on Wheels - Meal Delivery Service to Homebound Seniors
9	Spectrum Community Services
10	Boys and Girls Club of San Leandro Capital Improvement Project
11	San Leandro Homeless Shelter Repairs and ADA Accessibility Upgrades
11	San Leandro Homeless Shelter Repairs and ADA Accessibility Upgrades
11	San Leandro Homeless Shelter Repairs and ADA Accessibility Upgrades

**Table 4 – Project Information**

## AP-38 Project Summary

### Project Summary Information

1	<b>Project Name</b>	CDBG Program Administration
	<b>Target Area</b>	City-Wide
	<b>Goals Supported</b>	Affordable Housing Needs Goals Homelessness Needs Goals Community Development Needs Goals
	<b>Needs Addressed</b>	Affordable Housing Needs Homeless Needs Community Development Needs - Public Services Community Development Needs - Public Facilities Community Development Needs - Economic Development Administration
	<b>Funding</b>	\$131,503
	<b>Description</b>	General administration and oversight of the CDBG Program.
	<b>Target Date</b>	6/30/2020
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	8,482 low-income clients will be assisted with CDBG-funded services. This includes 8,457 public services clients; 10 Fair Housing services clients, and 15 housing rehabilitation program clients.
	<b>Location Description</b>	Various locations throughout the City and the County.
	<b>Planned Activities</b>	The City will continue to allocate 20% of its annual CDBG entitlement funds to the administration of the City's CDBG program.
2	<b>Project Name</b>	ECHO Housing - Fair Housing Program
	<b>Target Area</b>	City-Wide
	<b>Goals Supported</b>	Affordable Housing Needs Goals
	<b>Needs Addressed</b>	Affordable Housing Needs
	<b>Funding</b>	\$10,000
	<b>Description</b>	ECHO Housing provides fair housing services to San Leandro residents to reduce housing discrimination in the City.
	<b>Target Date</b>	6/30/2020

	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	Ten (10) low-income households will be assisted with fair housing services.
	<b>Location Description</b>	ECHO Housing staff provides fair housing services over the phone.
	<b>Planned Activities</b>	ECHO Housing Fair Housing Coordinator will: <ul style="list-style-type: none"> <li>• provide services to San Leandro households inquiring about fair housing and related issues, and/or alleging housing discrimination by evaluating and investigating complaints within 24 hours, when feasible, using trained investigators. If discrimination is suspected, mediation will be offered or referrals will be made to private attorneys or government agencies if the complainant so desires.</li> <li>• conduct a systematic fair housing audit to determine fair housing compliance, analyze data, and provide follow-up and training for non-compliant property owners and/or managers.</li> <li>• conduct an annual April Fair Housing Month event and a fair housing training session for tenant and/or potential homebuyers.</li> <li>• conduct presentations on fair housing issues; distribute fliers/brochures at public locations such as libraries, churches, community groups, social service agencies, and stores; and disseminate quarterly public service announcements.</li> </ul>
<b>3</b>	<b>Project Name</b>	Section 108 Loan Repayment
	<b>Target Area</b>	City-Wide
	<b>Goals Supported</b>	Community Development Needs Goals- <b>Improving Public Facilities and Infrastructure</b>
	<b>Needs Addressed</b>	Community Development Needs - Public Facilities
	<b>Funding</b>	\$187,414
	<b>Description</b>	The City submitted its HUD Section 108 Loan Guarantee Program Application for \$2.5 million which is needed to complete the construction of the City's new senior center. The City pledges futures CDBG funds to repay the \$2.5 million loan over 20 years. The City began repaying this loan in FY2010-2011.
	<b>Target Date</b>	6/30/2020
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	Not applicable.



	<b>Location Description</b>	Not applicable.
	<b>Planned Activities</b>	The City will use CDBG funds to repay its \$2.5 million HUD Section 108 Loan used to complete the construction of the City's senior center. The repayment amounts are in accordance with HUD's 20-year repayment schedule.
4	<b>Project Name</b>	ADA Transition Plan for City Facilities
	<b>Target Area</b>	City-Wide
	<b>Goals Supported</b>	Community Development Needs Goals
	<b>Needs Addressed</b>	Community Development Needs – Public Facilities
	<b>Funding</b>	\$123,849
	<b>Description</b>	The Departments of Engineering & Transportation and Public Works will complete architectural modifications to City facilities (City Hall, Halcyon Park, Main Library, Marina Community Center, Marina Park, Memorial Park, SL History Museum, SL Police Department, Stenzel Park, Washington Manor Library & Washington Manor Park/Family Aquatic Center) to make them more ADA accessible.
	<b>Target Date</b>	6/30/2020
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	
	<b>Location Description</b>	Several City facilities (City Hall, Halcyon Park, Main Library, Marina Community Center, Marina Park, Memorial Park, SL History Museum, SL Police Department, Stenzel Park, Washington Manor Library & Washington Manor Park/Family Aquatic Center).
<b>Planned Activities</b>	CDBG funds will be used to make several City facilities (City Hall, Halcyon Park, Main Library, Marina Community Center, Marina Park, Memorial Park, SL History Museum, SL Police Department, Stenzel Park, Washington Manor Library & Washington Manor Park/Family Aquatic Center) more accessible for seniors and disabled persons.	
5	<b>Project Name</b>	Single-Family Housing Rehabilitation Program
	<b>Target Area</b>	City-Wide
	<b>Goals Supported</b>	Affordable Housing Needs Goals
	<b>Needs Addressed</b>	Affordable Housing Needs
	<b>Funding</b>	\$100,000

	<b>Description</b>	The City's Single-Family Housing Rehabilitation Program will provide grants to very low- and low-income households for minor repairs to their homes.
	<b>Target Date</b>	6/30/2020
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	Fifteen (15) low-income households will have minor repairs completed in their single-family or mobile homes.
	<b>Location Description</b>	The owner-occupied homes, located within the jurisdictional boundaries of San Leandro, will be identified once the applications are processed.
	<b>Planned Activities</b>	CDBG funds will be used to provide grants to 15 income-eligible (extremely low- and very low-income) households to complete repairs to their owner-occupied single-family or mobile homes. Grants may be used for minor repairs that improve health and safety, home accessibility, exterior clean up, exterior paint, and seismic strengthening.
6	<b>Project Name</b>	CALICO - San Leandro Child Abuse Intervention Project
	<b>Target Area</b>	City-Wide
	<b>Goals Supported</b>	Community Development Needs Goals- <b>Providing Enhanced Public Services</b>
	<b>Needs Addressed</b>	Community Development Needs - Public Services
	<b>Funding</b>	\$22,000
	<b>Description</b>	CALICO, the Child Abuse Listening, Interviewing, and Coordination Center, provides family support services to improve mental health outcomes for San Leandro children and their families who have suffered from abuse.
	<b>Target Date</b>	6/30/2020
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	Fifty (50) abused children and thirty-six (36) caregivers will receive critical family support services, which includes forensic interviews.
	<b>Location Description</b>	CALICO Interview Center, 524 Estudillo Avenue, San Leandro, CA 94577

	<b>Planned Activities</b>	CALICO's Family Resource Specialist (FRS), a skilled mental health clinician, will provide critical therapeutic interventions that can place 50 abused children on the path of healthy adulthood. FRS will also provide caregivers with ongoing support that prevents that recurrence of violence and begins to foster healing for the children.
7	<b>Project Name</b>	Davis Street Family Resource Center's Family Support Services - Basic Needs Program
	<b>Target Area</b>	City-Wide
	<b>Goals Supported</b>	Community Development Needs Goals- <b>Providing Enhanced Public Services</b>
	<b>Needs Addressed</b>	Community Development Needs - Public Services
	<b>Funding</b>	\$42,941
	<b>Description</b>	Comprehensive Family Resource Center provides emergency services to low-income people in San Leandro enabling them to move out of poverty and into self-sufficiency. Family Support Services program includes basic needs services, food, clothing, housing assistance, employment support, counseling case management and information and referral, free medical and dental care, and childcare.
	<b>Target Date</b>	6/30/2020
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	DSFRC will provide services to 9,000 low-income individuals and families through their Basic Needs Services Program. The program provides emergency food supplies including food bags sufficient for an entire family for 7 days. DSFRC will provide 150 clients with crisis intervention and/or short-term community counseling and/or substance abuse prevention services.
	<b>Location Description</b>	Davis Street Family Resource Center, 3081 Telegraph Street, San Leandro, CA 94577
	<b>Planned Activities</b>	Basic Needs Program will provide 9,000 San Leandro clients with emergency food supplies. Basic Needs Program clients will be screened for eligibility for other social service needs and will be referred to other social service community providers. Counseling services, including weekly individual, family and crisis intervention, and substance abuse prevention and short-term counseling will be provided to 150 clients at both family resource centers and 10 San Leandro schools.
8	<b>Project Name</b>	SOS/Meals on Wheels - Meal Delivery Service to Homebound Seniors
	<b>Target Area</b>	City-Wide

	<b>Goals Supported</b>	Community Development Needs Goals- <b>Providing Enhanced Public Services</b>
	<b>Needs Addressed</b>	Community Development Needs - Public Services
	<b>Funding</b>	<b>\$44,000</b>
	<b>Description</b>	SOS/Meals on Wheels program delivers warm, nutritious meals to homebound seniors who are 60 years of age or older and unable to buy or prepare food for themselves.
	<b>Target Date</b>	6/30/2020 <b>2021</b>
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	160 homebound seniors will be provided with warm, nutritious meals.
	<b>Location Description</b>	The meals will be delivered to senior citizen's homes throughout the City.
	<b>Planned Activities</b>	SOS/Meals on Wheels will deliver warm, nutritious meals to 160 homebound seniors in San Leandro. Drivers will also provide health check-in visits and assist seniors with small tasks.
<b>9</b>	<b>Project Name</b>	Spectrum Community Services
	<b>Target Area</b>	City-Wide
	<b>Goals Supported</b>	Community Development Needs Goals- <b>Providing Enhanced Public Services</b>
	<b>Needs Addressed</b>	Community Development Needs - Public Services
	<b>Funding</b>	<b>\$42,500</b>
	<b>Description</b>	Spectrum works to support San Leandro Senior Citizens to stay healthy and independent by serving hot, nutritious meals in a supportive setting, five days a week.
	<b>Target Date</b>	6/30/2020 <b>2021</b>
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	210 low-income San Leandro Senior Citizens will receive hot, nutritious meals in a supportive setting
	<b>Location Description</b>	San Leandro Senior Center, 13909 E. 14th Street, San Leandro CA 94578

	<b>Planned Activities</b>	Meals will be served to San Leandro Senior Citizens five days a week and will total 248 days during the Fiscal Year. Each day, freshly prepared, nutritious lunch-time meals will be prepared at Spectrum’s central kitchen located at Josephine Lum Lodge in Hayward, CA.
<b>10</b>	<b>Project Name</b>	Boys and Girls Club of San Leandro Capital Improvement Project
	<b>Target Area</b>	City-Wide
	<b>Goals Supported</b>	<b>Community Development Needs Goals-Improving Public Facilities and Infrastructure</b>
	<b>Needs Addressed</b>	Community Development Needs - Public Facilities
	<b>Funding</b>	\$300,000
	<b>Description</b>	Since the 1970s the Boys and Girls Club have partnered with San Leandro to operate and maintain the pool facility located at the organizations club site. The organization has provided an aquatics program at the site that is available to City residents.
	<b>Target Date</b>	<del>12/31/2020</del> 6/30/2021
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	The Boys and Girls Club of San Leandro serves approximately 900 low-income youth ages 6-14 years of age. Once renovation and the locker room is completed the organization will return to this level of service.
	<b>Location Description</b>	Boys and Girls Club of San Leandro, 401 Marina Blvd, San Leandro, CA 94577
<b>Planned Activities</b>	Funding will be used to renovate the locker room and shower space for the pool which is serviced and maintained by San Leandro Department of Human Services and Recreation.	
<b>11</b>	<b>Project Name</b>	San Leandro Homeless Shelter Repairs and ADA Accessibility Upgrades
	<b>Target Area</b>	City-Wide
	<b>Goals Supported</b>	<b>Community Development Needs Goals-Improving Public Facilities and Infrastructure</b>
	<b>Needs Addressed</b>	Community Development Needs - Public Facilities
	<b>Funding</b>	\$143,725

	<b>Description</b>	The San Leandro Shelter is a 30-bed homeless shelter. While housed at San Leandro Shelter, residents receive a range of services including meals, on-site case management, housing search assistance, individual therapy, life skills coaching, domestic violence and parenting support groups, evening children's activities and access to health care services.
	<b>Target Date</b>	6/30/2020 <b>2021</b>
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	100 women and children clients annually.
	<b>Location Description</b>	San Leandro Shelter, 501 Davis Street, San Leandro CA
	<b>Planned Activities</b>	The capital improvement project will improve the program's accessibility for residents with mobility impairments, to enhance safety of the facility, to protect and extend the life of the structure and to increase the quality of life of the clients of the San Leandro Shelter. This will be accomplished by replacing the exterior ramp, stairs and entryway landing; rebuilding four bathroom shower stalls and subfloors, including ADA shower stall; and replacing the floors in the common area.
<b>12</b>	<b>Project Name</b>	<b>Rental Assistance Program</b>
	<b>Target Area</b>	City-Wide
	<b>Goals Supported</b>	Community Development Needs Goals- <b>Providing Enhanced Public Services</b>
	<b>Needs Addressed</b>	Community Development Needs - Public Services
	<b>Funding</b>	<b>\$451,972</b>
	<b>Description</b>	<b>The City of San Leandro will establish a Rental Assistance Program benefiting low- and moderate- income households (CDBG definition &lt;80% of the Area Median Income) who face eviction or financial hardship as a result of COVID-19. The goal of this program is to maintain housing stability of San Leandro residents. Current HUD guidance allows for three months of rental housing assistance of CDBG eligible recipient households.</b>
	<b>Target Date</b>	<b>6/30/2022</b>

<p><b>Estimate the number and type of families that will benefit from the proposed activities</b></p>	<p>TBD</p>
<p><b>Location Description</b></p>	<p>Provider TBD</p>
<p><b>Planned Activities</b></p>	<p>Funding will provided to a to-be-determined non-profit agency with demonstrated experience working with low or moderate income households; evaluating financial need; and ability to connect recipients to supportive services such as case management, financial planning and coaching; and special needs housing resources and providers. The agency selected with administering this program will be allowed to budget up to a maximum of 20% for administrative overhead for the duration of the contract.</p>





# CITY OF SAN LEANDRO



**DRAFT UPDATE**

## **CITIZEN PARTICIPATION PLAN FOR HOUSING AND COMMUNITY DEVELOPMENT**

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

Update Proposed: June 1, 2020

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Amended Language in red Times New Roman font, 12 point type.

## **1.0 INTRODUCTION**

Regulated by the **U.S. Department of Housing and Community Development (HUD)**, the City of San Leandro is required by law to have a detailed Citizen Participation Plan 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 Citizen Participation Plan 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, Housing Set-Aside and other funds. The Citizen Participation Plan (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 citizens during all stages of the process, and to respond to specific complaints and needs of citizens. The City will take all actions necessary to encourage the participation of all citizens, including minorities and non-English speaking persons, persons with disabilities, and residents of public and assisted housing, in addition to all San Leandro residents, and public and private agencies. Citizens are asked to identify needs and objectives, prioritize these needs, recommend how much money should be allocated to each high-priority need and suggest the types of programs to meet these needs.

The parties involved in the process comprise neighborhood and citizen groups, non-profit agencies, community-based organizations, social service agencies, business organizations, homeowners associations and San Leandro residents, especially minorities, non-English speaking persons, persons with disabilities and residents of public and assisted housing (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 shall be published at least 10 days prior to a scheduled public hearing. The 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. The public notice will announce the date and location of the public hearing. The notice will summarize a list of the proposed needs, objectives and goals, along with the proposed projects and activities for the Plans and

Substantial Amendments to the Plans, including the CPP. The content of notices shall convey to the residents a clear understanding of the event being announced.

- Public Notices shall be published as legal advertisements in at least one newspaper of general circulation serving the San Leandro residents. Notices will also be posted at City Hall, Main Library and other buildings which provide access to the public, as listed in Section 4.0.
- The notices will be posted on the City's website at <https://www.sanleandro.org/depts/cd/housing/plans.asp> ~~\_\_\_\_\_~~ <http://www.ci.san-leandro.ca.us/slcommunitydev.html> and <http://www.ci.san-leandro.ca.us/newsbriefs.html>.
- Copies of the notice will be available at the City Clerk's Office and in the Community Development Department.
- A copy of the notice will be provided to any person or organization on the CDBG mailing list. All interested parties may request listing on the mailing 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 and advertise on the local television cable channel and the local radio station.

#### **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:
  - San Leandro Main Library, Government Document Section, 300 Estudillo Avenue, San Leandro, CA 94577
  - Housing Services Division, Community Development Department, City Hall, 835 East 14<sup>th</sup> Street, 1<sup>st</sup> Floor, San Leandro, CA 94577
  - City Clerk's Office, City Hall, 835 East 14<sup>th</sup> Street, 2<sup>nd</sup> Floor, San Leandro, CA 94577
- Copies of the document will also be made available at the city's website, <https://www.sanleandro.org/depts/cd/housing/plans.asp> <http://www.ci.san-leandro.ca.us/slcommunitydev.html> and <http://www.ci.san-leandro.ca.us/newsbriefs.html>.
- Upon request, documents will be made available in a format accessible to persons with disabilities.

## **5.0 PUBLIC HEARINGS**

Public hearings are required in order to obtain the public's views and to provide the public with the City's responses to public questions and proposals.

Public hearings will be held after a notice has been published in a local newspaper, at least 10 days prior to the date of the scheduled meeting. An agenda for the meeting shall be posted at City Hall 72-hours prior to the meeting. Public hearings are usually held during City Council meetings on every other Monday of the month at 7:00 p.m. at the Council Chambers at City Hall. 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. 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, if requests are made within five working days prior to the hearing to the City Clerk's office.

If national or local health authorities recommend social distancing and limit public gatherings for public health reasons, then a virtual hearing method will be used in lieu of in-person hearing. If virtual hearings are 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.

In response to national or local public health or other similar emergency and federal stimulus funds have been awarded in response to that crisis, then the City of San Leandro may provide a reduced public notice and comment period to consider Substantial Amendments to the Consolidated Plan and/or Annual Action Plan(s) in order to expedite allocation and expenditure of those funds.

## **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.

2. Community meetings will be held at various locations convenient to the public. Because the goal of the planning process is to have as many citizens as possible participate, the City will send out notices to individuals and organizations on the CDBG mailing list, post notices at neighborhood centers and other locations accessible to the public, and advertise 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, 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. Presentation to Council Sub-Committee: An initial draft of the Consolidated Plan will be presented to the Council Business Development Sub-Committee, before presenting it to the City Council at a public hearing.
4. First Public Notice: Presentation of the proposed plan requires advance notices to the public. The publication notice should follow steps in Section 3.0 of this Plan. Notices of the public hearing shall be sent to all persons on the CDBG mailing list and attending the community meetings.
5. First Public Hearing: A public hearing will be held at a Council meeting on a date announced in the public notice, outlined in Section 3.0. Please refer to Section 5.0 for public hearing procedures. The City Council will approve the proposed Consolidated Plan and direct staff to solicit public comments for at least 30 days and set the next hearing date.
6. Second Public Notice: A summary of the proposed Consolidated Plan shall be published 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 to the public. The notice will include information about the date, time and location of the final public hearing. The notice shall include a brief summary of a description of the contents and purpose of the Plan including a list of the goals, objectives, and activities that will be undertaken over the next five years. The objectives and activities need to be measurable for each year, so that the City can annually compare the outcomes against the proposed outcomes in the Plan. The estimated amount of assistance that the City expects to receive and the amount that will be used to undertake activities that will benefit persons of low and moderate income must also be included in the publication. Free copies of the Plan 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.
7. Final Public Hearing: The final public hearing will be held at a scheduled Council meeting. All comments submitted by the public, either in writing or orally at public hearings and during the comment period, shall be 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. The Council will adopt the final Consolidated Plan with any Substantial Amendments and submit this document to HUD at the San Francisco Office.

## **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. **Human Services Commission and Public Services:** Proposed public service objectives and/or activities listed in the Five Year Consolidated Plan shall be presented to the Human Services Commission. The Recreation and Human Services Department shall issue a Request for Proposals for both the CDBG public service activities and the City's Community Assistance Grants. The City staff and the Commission will evaluate the proposals and provide a recommendation to the City Council of agencies with whom the City could contract for public services to meet the objectives in the Consolidated Plan.
4. **Council Business Development Sub-Committee Review:** The proposed Plan shall be presented to the Council Business Development Sub-Committee for recommendations, before presenting it to the City Council at the first public hearing.
5. **First Public Notice:** Presentation of the proposed plan requires advance notice to the public. The publication notice should follow steps in Section 3 of this Plan. Notices of the public hearing shall be sent to all persons on the CDBG mailing list. The estimated amount of assistance that the City expects to receive, including program income will be listed in the notice.
6. **First Public Hearing:** A public hearing will be held at a Council meeting on a date announced in the public notice as described Section 5.0 for public hearing procedures.

The City Council will approve the proposed Annual Action Plan, direct staff to solicit public comments for at least 30 days, and set the next public hearing date.

7. Second Public Notice: A summary of the proposed Annual Action Plan shall be published to solicit comments over at least a 30-day period. The publication should clearly state the start and end date of the comment period and list the locations, as identified in the Section 4, where copies of the Plan will be available to the public. The notice will include information about the date, time and location of the final public hearing. The notice shall include a brief description of the proposed activities with the amount of funding for each project and the amount that will be used to undertake activities that will benefit persons of low and moderate income. Upon request, free copies of the Plan will be made available to the public and will also be made available in a format accessible to persons with disabilities.
8. Final Public Hearing: The final public hearing will be held at a scheduled Council meeting, where all comments received will be taken into consideration. These comments, along with reasons for those not accepted shall be attached to the final Annual Action Plan, which will be adopted by the City Council.

The final plan will be then submitted to HUD by May 15. 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 to the public at locations listed in Section 4.0.

### **6.3 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 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 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.



In response to the Coronavirus Pandemic (COVID-19), the Coronavirus Aid, Relief, and Economic Security Act (CARES Act), Public Law 116-136 was adopted and authorized on March 27, 2020. The CARES Act allows the U.S. Department of Housing and Community Development (HUD) to waive or specify alternative requirements to expedite distribution of funding in response to COVID-19. Soon after the signing of the CARES Act, HUD issued guidance that allows cities to shorten the public comment period for amending the Citizen Participation Plan to maximize the use of CDBG and CDBG-CV funds allocated to entitlement jurisdictions. As a result, on April 13, 2020, HUD issued a waiver to the City of San Leandro that permits a reduced period of 5 days for public noticing and public comment.

### 6.3.2 EMERGENCY RESPONSE & EXPEDITED SUBSTANTIAL AMENDMENTS

1. Declaration of a Disaster and/or Emergency: It may be necessary to expedite Substantial Amendments to the Consolidated Plan and/or Annual Action Plan(s) 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 (1) Human-made disasters, (2) Natural disasters, and (3) Terrorism. Human-made disasters can include chemical spills, mass rioting, power outages, dam failure, plant explosions, etc. Natural disasters can include earthquakes, tsunamis, hurricanes, tornadoes, wild fires, flooding and public health crises such as wide-spread disease such as the coronavirus pandemic (COVID-19). Terrorism events include bomb threats, biochemical attacks like the spread of anthrax, or cyber-attacks like hacking, phishing, and virus distribution, etc.
2. Substantial Amendment(s): Expedited Substantial Amendments may include funding new activities and/or the reprogramming of funds including canceling activities to meet needs resulting from a declared disaster or emergency. The City of San Leandro may utilize CDBG or HOME funds to meet these needs.
3. Use of funds: With respect to a declared disaster, the City of San Leandro may elect to use CDBG or HOME funds to address needs not provided for by the Federal Emergency Manager Agency (FEMA) and the Small Business Administration (SBA), or other disaster relief efforts. Funding for disaster relief may not duplicate other efforts undertaken by federal or local sources unless allowed by the federal government. Potential eligible uses of funds are those that are included in this Citizen Participation Plan, the Consolidated Plan, Annual Action Plan or any other CDBG or HOME eligible use. HUD may provide new guidance on eligible uses in which the City will comply with and may utilize as well. All eligible CDBG activities, including those to address declared disasters or emergencies, must meet one of three national objectives which are: (1) Benefit to low- and moderate-income (LMI) persons; (2) Aid in the prevention of slums or blight; and (3) Meet a need having a particular urgency (referred to urgent need). The City of San Leandro may carryout eligible CDBG activities to meet needs resulting from declared disasters or emergencies under any one of the three national objectives.
4. Urgent Need National Objective: To comply with the CDBG National Objective of meeting community development needs having particular urgency, an activity will alleviate existing conditions that the City of San Leandro certifies: (1) Pose a serious and immediate threat to the health and welfare of the community; (2) Are of recent origin or recently became urgent; (3) The

City is unable to finance the activity on its own; and, (4) Other resources of funding are not available to carry out the activity. A condition will generally be considered to be of recent origin if it is developed or became critical within 18 months preceding the City's certification. If HUD allows, such as through a waiver, activities under the urgent need national objective to be funded without the requirement that the City is unable to finance the activity on its own and other resources of funding are not available to carry out the activity, the City will only certify that the activity poses a serious and immediate threat to the health and welfare of the community and is of recent origin or recently became urgent.

5. Expedited Public Noticing: If the federal government, State, County or City declares a disaster or emergency, then the City may expedite the public comment period to 5-days instead of the required 30-day public comment period, which is otherwise required for Substantial Amendments.

### 6.3.3 THE PROCESS

1. 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. These notices shall be published at least 30 days prior to the scheduled date for the presentation of the Substantial Amendment(s) to the Council at a public hearing. The notice shall be published in, at least, one newspaper of general circulation, containing the date, time and location of the public hearing. The notice may also be advertised through the local television cable channel and the local radio station.
2. Public Hearing: A public hearing to consider the Substantial Amendments will be held at a City Council meeting on a date announced in the a notice published in accordance with the requirements described in Section 5.0.
3. Public Comment Period and Public Notice: A summary of the Substantial Amendment(s) will be published in a newspaper of general circulation to solicit comments within at least a period of 30 days before the Substantial Amendment is implemented. 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 Council will approve the Substantial Amendments.
4. Public Meeting to Approve the Substantial Amendment(s): The public meeting will be a scheduled Council meeting. The Council will approve the amended Plan which will include all the comments received and the reason any comments might not been considered.
5. The Substantial Amendment(s) will then be submitted to HUD Office in San Francisco. Copies of the amended Plan(s) will be made available to the public at locations listed in Section 4.0.

## 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.

In response to the Coronavirus Pandemic (COVID-19), the Coronavirus Aid, Relief, and Economic Security Act (CARES Act), Public Law 116-136 was adopted and authorized on March 27, 2020. The CARES Act allows the U.S. Department of Housing and Community Development (HUD) to waive or specify alternative requirements to expedite distribution of funding in response to COVID-19. On May 18, 2020, HUD issued preliminary guidance that allows cities to extend the amount of time that it needs to submit the CAPER. Under the authority at section 24 CFR 91.520(a), the City is required to submit the CAPER to HUD within 90 days after the close of City's program year on June 30, 2020. Under the authority at section 24 CFR 91.600, HUD has authorized the waiver of this requirement given the determination of good cause due to COVID-19. For the City's Program Year 2019 (July 1, 2019 to June 30, 2020) the requirement that the CAPER be submitted within 90 days of the end of the program year is waived. Further, the guidance requires the submittal of the CAPER within 180 days after the close of the City's Program Year.

### 6.4.2 EMERGENCY RESPONSE & EXPEDITED SUBSTANTIAL AMENDMENTS

1. Declaration of a Disaster and/or Emergency: It may be necessary to delay the submittal of the CAPER 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 (1) Human-made disasters, (2) Natural disasters, and (3) Terrorism. Human-made disasters can include chemical spills, mass rioting, power outages, dam failure, plant explosions, etc. Natural disasters can include earthquakes, tsunamis, hurricanes, tornadoes, wild fires, flooding and public health crises such as wide-spread disease such as the coronavirus pandemic (COVID-19). Terrorism events include bomb threats, biochemical attacks like the spread of anthrax, or cyber-attacks like hacking, phishing, and virus distribution, etc.
2. Performance Reporting Deadline Extensions: Under the authority at 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 at section 24 CFR 91.600, HUD has the authority to extend this deadline if there is a determination of good cause.

### 6.4.3 THE PROCESS:

1. Public Notice: A public notice shall be published at least 20 days prior to the scheduled date for the presentation of the CAPER to the Council at a public hearing. The notice shall be published in, at least, one newspaper of general circulation, containing 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. Free copies will be made available to the public upon request and a copy of the proposed CAPER shall be available on the City's web site. 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 at a City Council meeting on a date announced in the notice published in the newspaper. Section 5.0 describes the public hearing requirements. All comments received will be taken into consideration. The approved CAPER shall include a summary of the comments and views of the citizens and shall be attached to the CAPER.
3. The CAPER will be sent to HUD every year by September 28. 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.

## **6.5 Citizen Participation Plan and Amendments to the Citizen Participation Plan**

- 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.

In response to the Coronavirus Pandemic (COVID-19), the Coronavirus Aid, Relief, and Economic Security Act (CARES Act), Public Law 116-136 was adopted and authorized on March 27, 2020. The CARES Act allows the U.S. Department of Housing and Community Development (HUD) to waive or specify alternative requirements to expedite distribution of funding in response to COVID-19. Soon after the signing of the CARES Act, HUD issued guidance that allows cities to shorten the public comment period for amending the Citizen Participation Plan to maximize the use of CDBG and CDBG-CV funds allocated to entitlement jurisdictions. As a result, on April 13, 2020, HUD issued a waiver to the City of San Leandro that permits a reduced period of 5 days for public noticing and public comment.

### **6.5.2 EMERGENCY RESPONSE & EXPEDITED SUBSTANTIAL AMENDMENTS**

1. Declaration of a Disaster and/or Emergency: It may be necessary to expedite Substantial Amendments to the Consolidated Plan and/or Annual Action Plan(s) 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 (1) Human-made disasters, (2) Natural disasters, and (3) Terrorism. Human-made disasters can include chemical spills, mass rioting, power outages, dam failure, plant explosions, etc. Natural disasters can include earthquakes, tsunamis, hurricanes, tornadoes, wild fires, flooding and public health crises such as wide-spread disease

such as the coronavirus pandemic (COVID-19). Terrorism events include bomb threats, biochemical attacks like the spread of anthrax, or cyber-attacks like hacking, phishing, and virus distribution, etc.

2. Substantial Amendment(s): Expedited Substantial Amendments may include funding new activities and/or the reprogramming of funds including canceling activities to meet needs resulting from a declared disaster or emergency. The City of San Leandro may utilize CDBG or HOME funds to meet these needs.
3. Use of funds: With respect to a declared disaster, the City of San Leandro may elect to use CDBG or HOME funds to address needs not provided for by the Federal Emergency Manager Agency (FEMA) and the Small Business Administration (SBA), or other disaster relief efforts. Funding for disaster relief may not duplicate other efforts undertaken by federal or local sources unless allowed by the federal government. Potential eligible uses of funds are those that are included in this Citizen Participation Plan, the Consolidated Plan, Annual Action Plan or any other CDBG or HOME eligible use. HUD may provide new guidance on eligible uses in which the City will comply with and may utilize as well. All eligible CDBG activities, including those to address declared disasters or emergencies, must meet one of three national objectives which are: (1) Benefit to low- and moderate-income (LMI) persons; (2) Aid in the prevention of slums or blight; and (3) Meet a need having a particular urgency (referred to urgent need). The City of San Leandro may carryout eligible CDBG activities to meet needs resulting from declared disasters or emergencies under any one of the three national objectives.
4. Urgent Need National Objective: To comply with the CDBG National Objective of meeting community development needs having particular urgency, an activity will alleviate existing conditions that the City of San Leandro certifies: (1) Pose a serious and immediate threat to the health and welfare of the community; (2) Are of recent origin or recently became urgent; (3) The City is unable to finance the activity on its own; and, (4) Other resources of funding are not available to carry out the activity. A condition will generally be considered to be of recent origin if it is developed or became critical within 18 months preceding the City’s certification. If HUD allows, such as through a waiver, activities under the urgent need national objective to be funded without the requirement that the City is unable to finance the activity on its own and other resources of funding are not available to carry out the activity, the City will only certify that the activity poses a serious and immediate threat to the health and welfare of the community and is of recent origin or recently became urgent.
5. Expedited Public Noticing: If the federal government, State, County or City declares a disaster or emergency, then the City may expedite the public comment period to 5-days instead of the required 30-day public comment period, which is otherwise required for Substantial Amendments.

### 6.5.3 THE PROCESS

1. Public Notice: Presentation of the CPP or Substantial Amendment(s) made to the CPP requires advance notice to the public. This notice shall be published at least 30 days prior to the scheduled date for the presentation of the Plan or the Substntial Amendment(s) to the Council at a public hearing. The notice shall be published in,

at least, one newspaper of general circulation, containing the date, time and location of the public hearing. The notice shall contain information about the purpose of the CPP or any Substantial Amendment. The publication shall also include a list of locations, as stated in Section 4.0, where the CPP and/or a list of the 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.

2. Public Hearing: A public hearing to consider the amendments will be held at a City Council meeting on a date announced in the notice published in the newspaper. See Section 5.0 on public hearing requirements. Copies of the CPP or the amended CPP will be made available to the public at locations listed in Section 4.0.

## **7.0 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.

## **8.0 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.

## **9.0 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.



# City of San Leandro

Meeting Date: June 1, 2020

## Minute Order - Council

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**File Number:** 20-219

**Agenda Section:** PUBLIC HEARINGS

**Agenda Number:**

**TO:** City Council

**FROM:** Jeff Kay  
City Manager

**BY:** Tom Liao  
Community Development Director

**FINANCE REVIEW:** Liz Warmerdam  
Interim Finance Director

**TITLE:** MOTION Directing Staff to Hold a Public Hearing, Publish the Draft Amendments to the (1) FY 2015-2020 Five-Year Consolidated Plan, (2) FY 2019-2020 Annual Action Plan, and (3) Citizen Participation Plan for a 5-Day Comment Period (June 2 - June 7, 2020), and Set a Public Hearing for June 15, 2020 to Consider Final Approval of the Amendments to the FY 2015-2020 Five-Year Consolidated Plan, the FY 2019-2020 Annual Action Plan, and the Citizen Participation Plan

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