



CITY OF SOUTH JORDAN, UTAH
CITIZEN PARTICIPATION PLAN

April 2020

City of South Jordan

1600 W. Towne Center Drive (10610 S.), South Jordan, Utah 84095 (801)-446-4357

The Citizen Participation Plan Requirement

This document constitutes the Citizen Participation Plan for the City of South Jordan's Consolidated Plan. South Jordan's Citizen Participation Plan (CPP) describes how citizens will participate in three programmatic areas:

1. Development of the Consolidated Plan,
2. Substantial amendments made to the Consolidated Plan, and
3. Development of the annual performance report (CAPER).

This CPP sets forth the City of South Jordan's policies and procedures for citizen participation for the use of Community Development Block Grants (CDBG) funds. The Citizen Participation Plan provides an opportunity for the community to work in partnership with the City to identify needs and to allocate CDBG funds.

The City of South Jordan holds the following standards regarding citizen involvement:

1. All citizen participation is to be done openly.
2. Involvement of low- and moderate-income persons, minorities, project area residents, elderly, handicapped and others is to be evident.
3. Reasonable efforts to ensure continuity of involvement of citizens throughout all stages of the CDBG program are to be evident.
4. Timely and adequate information is to be given to citizens.
5. Citizens are encouraged to submit their views and proposals regarding the Consolidated Plan and use of CDBG funds.

While the Citizen Participation Plan will aim to ensure the participation of all residents, special assurances will be made to ensure the participation of the following groups:

- extremely low-, low-, and moderate-income persons;
- persons living in areas where CDBG funds are proposed to be used;
- residents of publicly assisted housing;
- low-income residents of target neighborhoods;
- minorities;
- non-English speaking persons; and
- persons with physical disabilities.

As required by law, the Citizen Participation Plan adheres to guidelines provided by the U.S. Department of Housing and Urban Development (HUD), 24 CFR Part 91.105, in order to qualify for participation in the Community Development Block Grant Program (CDBG).

Citizen Participation Plan Development Process and Adoption

The Consolidated Plan process begins with issuing the Citizen Participation Plan (CPP) which describes the Plan Development Process. The CPP informs the public about processes

and procedures for public access and influence on the Consolidated Plan and Annual Action Plans, and the proposed scheduling for development and submission of the plan.

Copies of the CPP are made available at least 2 weeks prior to the first public hearing at the City of South Jordan City Hall, selected community based organization offices, and on the City of South Jordan's website: <http://sjc.utah.gov/>. The CPP is also made available during the review of the Consolidated Plan.

Prior to the adoption of the Citizen Participation Plan, implementation of the following public comment, review, and adoption procedures ensure that all citizens have a chance to participate in development of the Plan.

1. The City will provide a notice of the 15-day public review period for the Citizen Participation Plan in the legal section of *The Salt Lake Tribune* and *The Deseret News*.
2. The proposed Citizen Participation Plan will be available for public review at the City of South Jordan City Hall, the City of South Jordan Community Center, and the City of South Jordan website at <http://sjc.utah.gov/>.
3. Upon request, the Plan will be made accessible to any person with disabilities. The City will provide a reasonable number of free copies of the Citizen Participation Plan to citizens and groups that request copies.
4. Comments or views of citizens received in writing during the public review period will be solicited by the City of South Jordan staff. Comments can be sent to the CDBG Coordinator by email (see sjc.utah.gov/CDBG for current email address) or in writing to the CDBG Coordinator, 1600 W. Towne Center Dr., South Jordan, Utah 84095, or by calling 801-446-4357.
5. The Final Plan will include a summary of public comments and a summary of any comments not accepted and the reasons therefore, all of which will be attached to the final Citizen Participation Plan.

Amendment of the Citizen Participation Plan

The City will amend its approved Citizen Participation Plan whenever a change in the public participation process, as outlined in this plan, is proposed. An amendment to the approved Citizen Participation Plan will be reviewed by the City of South Jordan City Council in a City Council meeting and approved by the Council. Notice of any amendment to the Citizen Participation Plan will be published in the *Salt Lake Tribune* and *The Deseret News* no less than 15 days prior to the review and adoption to allow the public the opportunity to review and comment on the amendment. Appeals concerning the amendment should follow the Appeal procedures outlined in this document.

Consolidated Plan Development Public Process

The CPP includes a vigorous effort to notify the Salt Lake County Housing Authority and other government agencies as well as the affected public about the Plan Development

Process and to provide ample opportunity for citizen input at all stages. In the course of developing the Consolidated Plan, there is a public hearing and a 30-day, open comment period during the drafting stages before the document is finalized and submitted to HUD.

The Consolidated Plan development process consists of the following steps:

- Preparing and issuing (or reissuing) the Citizen Participation Plan with Notice of the Consolidated Plan and Annual Action Plan Public Hearing,
- Preparing and issuing a draft proposed Five-Year Plan (if a new 5-Year Plan must be developed), and/ or a draft proposed Action Plan for the current fiscal year,
- Submitting the final proposed Consolidated Plan and Annual Action Plan to the City Council for approval,
- Finalizing the Consolidated Annual Action Plan, and
- Submitting the Consolidated Annual Action Plan to HUD prior to the May 17th annual deadline.
- If necessary, the Annual Action Plan may have to be amended in order to reallocate funding or modify program language. If the amendment is considered substantial (the criteria are outlined later in this document), a formal amendment will be proposed, considered, and acted upon;
- At a second public hearing at the end of the performance year, the Consolidated Annual Performance Evaluation Report (CAPER) will be addressed. After the completion of the program year, a CAPER will be drafted and submitted to HUD.

PLAN DEVELOPMENT SCHEDULE*

EVENT	DATE
Issuance of Citizen Participation Plan with Notice of Hearing	February - March
Publication of proposed Consolidated Plan and Action Plan	April
Public Hearing on proposed Action Plan & Budget	April
Finalization of Action Plan	April -May
Submission of Action Plan application to HUD	May

*Specific dates and locations are provided in published Notices, through direct mailings, in publicly accessible locations, and on the City of South Jordan website.

Public Notice

There shall be advanced public notice once a federally required document is available, such as the Proposed Annual Action Plan or Five-Year Consolidated Plan, any proposed

Substantial Amendment to the Action Plan or Consolidated Plan, and the Consolidated Annual Performance Evaluation Report (CAPER).

In addition, there shall be advanced public notice of all public hearings relating to the funds or planning processes covered by this Citizen Participation Plan.

Forms of Public Notice

1. Any activity requiring public notice will be placed on the City's web page at <http://sjc.utah.gov/>.
2. Newspapers of General Circulation: Public notices will be published as notices in the legal section of *The Salt Lake Tribune* and *The Deseret News* at least 15 days before the date of a hearing.
3. Press Releases will also be distributed to the local media.
4. Notice will be given to organizations that may receive funding from or who have collaborated with the City of South Jordan in the past, neighborhood organizations, and any other parties on our mailing list. The list includes but is not limited to: public and private agencies that provide housing, health, and social services including those that provide services to children, elderly, disabled, persons living with HIV/AIDS, and the homeless; public and private agencies that represent minority groups living in the City of South Jordan; organizations representing non-English speaking citizens in the City of South Jordan; and other interested parties.
5. Notice will be posted on the public bulletin board outside the City Council Chambers.
6. Notice will also be given to any person or group that requests information.

Public Hearings

The City will conduct public hearings at locations and at times that are convenient to the public, especially for those persons affected by program resources, and the locations will be equipped to accommodate persons with physical disabilities. As such, all public hearings and meetings will be conducted at City Hall, 1600 W. Towne Center Drive (10610 S), South Jordan, UT, 84095.

For non-English speakers, Spanish translation will be available at all public hearings if requested three (3) days prior to the hearing date. Other requests for reasonable accommodation (such as sign language) must be made three (3) days prior to the hearing date and the City will provide appropriate assistance to the extent feasible. Residents should call (801) 254-3742 to request translation or other reasonable accommodations.

Public Access and Accommodation

The City of South Jordan facilitates broad-based participation in its planning process by providing:

- No less than two-week advance publication of a Notice of Public Hearings,
- No less than 30 days to review the draft documents,
- Two-week periods following hearings for the submission of additional comments,
- Mailings of Notices to a wide range of interested groups,
- Easy access to draft documents (hard copies and on-line) and hearing transcripts,
- Accommodation of special needs participation through sign-language interpreters and interpreters for Spanish-speaking constituents, and
- Holding hearings at convenient times and in barrier-free facilities that are easily accessible by public transportation.

Development of The Consolidated Plan

A. Identifying Needs

The critical first step in a collaborative effort to address the City's housing and community development programs and goals is to reach an agreement on the City's priority needs.

Gathering Input on Housing and Community Development Needs: The City of South Jordan will actively solicit and encourage input from citizens on needs within the community. The City will especially encourage participation from low- and moderate-income residents where housing and community development funds may be spent. Input will be sought from all residents and low- and moderate-income residents, public housing residents and Section 8 voucher holders, minorities, seniors and other special needs populations through the use of a web-based survey instrument identifying top community needs. This survey will be available on the City website, and distributed widely to local housing authorities, community and neighborhood groups, nonprofit agencies and service providers, philanthropic organizations, the Salt Lake County Continuum of Care, community and faith based organizations. Paper surveys will be provided to those without computer access. The survey will be advertised on the City website, through community groups and service providers, and in *The Deseret News* and *Salt Lake Tribune*.

The City will also conduct a series of interviews with agencies that provide services and housing for special needs and low-income populations on the needs of their clients. These include adjacent local governments, economic development interests, and state and local health agencies. The City will consult private agencies that provide health services, social services for children, elderly, disabled, homeless, persons with AIDS, victims of domestic violence, and persons with alcohol/drug abuses, etc.

All of the groups, populations, and agencies mentioned above will be encouraged to participate in the Public Hearing held to discuss the proposed strategies and actions in the draft Five Year Consolidated Plan and Annual Action Plan.

B. The Proposed Action Plan (and/or Five-Year Consolidated Plan)

The Consolidated Plan consists of three parts: the needs assessment, housing and

community development strategic plan, and an action plan. The Consolidated Plan identifies the housing and community development needs in the City, prioritize the needs for funding, and prescribes a comprehensive strategy for addressing the needs. To maintain relevance, an annual One-Year Action Plan is developed which includes the following elements:

- Dollar amounts proposed for each activity
- A description and location of each activity
- The entity responsible for implementation of each activity
- Time frame for each activity

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

Three groups involved in the process of Consolidated Plan and Action Plan development include:

- Citizens and Agencies Contacted During the Consolidated Plan Process
- Staff Working Group
- City Council

Citizens and Agencies Contacted for Input During the Planning Process - See above.

Staff Working Group- Coordinated through the City Manager's Office, the working group will be comprised of representatives from the various City departments responsible for HUD-funded programs/projects, including Finance, Planning, Seniors and the Community Center, and the City Manager's Office. The group will perform in an advisory manner to the City Council concerning planning, implementing and assessing the CDBG program and activities through the following:

- Collecting citizen input concerning neighborhood/ community needs;
- Preparing a prioritized list of neighborhood/ community needs for review during the preparation of the Consolidated Plan and Annual Action Plan;
- Preparing project recommendations for review by the City Council and for the Council's final approval; and
- Reviewing project/program progress.

City Council - The City Council will fulfill its role by holding public hearings and carrying out the procedures established in this Citizen Participation Plan. The City Council makes the final determination about the priority of various community needs that will guide the Council when annually allocating CDBG funds in the Action Plan.

C. Public Hearing and Comment Period on the Proposed Five Year Consolidated Plan, Annual Action Plan and the CAPER

1. **Public Notice - Proposed Five Year Plan, and / or Annual Action Plan Hearing:** The City will give notice of a public hearing on the Proposed Five Year Consolidated Plan and Action Plan to be held in April, providing 15 days' advance notice. The notice will follow the guidelines set out in the "Public Notice" section of this Citizen Participation Plan. The public hearing notice shall include a summary of the contents and purpose of the Action and/or Consolidated Plan and shall include a list of the locations where copies of the entire proposed plan may be examined.
2. **Public Review - Proposed Five Year Plan and/or Annual Action Plan:** During the 30-day public comment period, copies of the proposed Action Plan and/or Consolidated Plan will be made available for public review at City Hall and the Community Center. Reasonable accommodations will be made for non-English speaking persons and for people with disabilities. The City of South Jordan shall provide a reasonable number of free copies of the Action and/or Consolidated Plan to citizens and groups upon request.
3. **Public Comments - Proposed Five Year Plan and/ or Annual Action Plan:** The public may comment on the Action Plan and/or Consolidated Plan in writing or at the public hearing. Comments can be sent to the CDBG Coordinator by email (see sjc.utah.gov/CDBG for current email address) or in writing to the CDBG Coordinator, 1600 W. Towne Center Dr., South Jordan, Utah 84095, or by calling 801-446-4357.
4. The City of South Jordan shall consider any comments or views received during the 30-day public comment period in preparing the final Action and/or Consolidated Plan. A summary of all comments or views, and a summary of any comments or views not accepted (that is, comments or views that do not result in changes) and the reasons thereof, shall be attached to the final Action Plan and/or Consolidated Plan.
5. A public hearing is held by the City of South Jordan to gather public input on the City's annual performance and evaluation report for the last program year. The report analyzes progress toward the goals established in previous plans with regard to the unit of measure for the project, as well as timely completion. This report also provides information on the performance of funded projects in relationship to the program objectives.
6. **Public Notice and Hearing - Annual CAPER Report** - The City of South Jordan will conduct one additional public hearing to allow the public to comment on the annual CAPER Report to HUD, which reports the accomplishments, expenditures, and outcomes of the CDBG program. The City will follow the guidelines set out in the "Public Notice" section of this Citizen Participation Plan. The public hearing notice shall include a summary of the contents and purpose of the CAPER, and shall include a list of the locations where copies of the entire CAPER may be examined.

7. **Public Review- CAPER:** During the 15-day public comment period, copies of the CAPER will be made available for public review at the front desk in City Hall. Reasonable accommodations will be made for non-English speaking persons and for people with disabilities. The City of South Jordan shall provide a reasonable number of free copies of the CAPER to citizens and groups upon request.
8. **Public Comments - CAPER:** The public may comment on the CAPER in writing or at the public hearing. Comments can be sent to the CDBG Coordinator by email (see sjc.utah.gov/CDBG for current email address) or in writing to the CDBG Coordinator, 1600 W. Towne Center Dr., South Jordan, Utah 84095, or by calling 801-446-4357.
9. The City of South Jordan shall consider any comments or views received during the 30-day public comment period in preparing the final CAPER. A summary of all comments or views, and a summary of any comments or views not accepted (that is, comments or views that do not result in changes) and the reasons thereof, shall be attached to the final CAPER.

D. The Final Action Plan (and/or Five-Year Consolidated Plan)

Copies of the final Action Plan and/or Consolidated Plan and the Executive Summary will be made available to the public for free upon request. The Executive Summary will also be posted on the City's website

E. Amendments to the Action Plan (and/or Five-Year Consolidated Plan)

Substantial Amendment Criteria:

Consolidated Plan (Five-Year Strategy) -The City will amend its approved Consolidated Plan (Five-Year Strategy) whenever a decision is made to propose a substantial change in allocation priorities. For the purpose of the Consolidated Plan, a "substantial change" will constitute a cumulative change equal to or in excess of 25% of the City's CDBG entitlement for a program year.

Changes in funding priority not amounting to more than 25% of a program year will not be considered a substantial change to the Consolidated Plan or Annual Action Plan; no formal amendment to the Consolidated Plan requiring public review and comment will be warranted. (For example, an amendment to the Consolidated Plan is needed if the five-year Strategy identifies only a low priority need for historic preservation, but during the five-year timeframe the City decides to establish a CDBG-funded historic preservation program that amounts to more than 25% of the City's annual allocation.)

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

- to carry out an activity not previously described in the Action Plan;
- to cancel an activity previously described in the Action Plan;
- to increase the amount to be expended on a particular activity from the amount stated in the Action Plan by more than 25%; or
- to substantially change the purpose, scope, location, or beneficiaries of an activity.
- Changes in funding for an existing activity (project) not amounting to more than 25% will not be considered a substantial change to the Action Plan; no formal amendment to the Action Plan requiring public review and comment will be warranted

Comment Period for Substantial Amendments: A "substantial amendment" is an amendment to the Consolidated Plan or Annual Action Plan that requires 30 days of public comment. Prior to submitting substantial amendments to HUD, the City of South Jordan will provide citizens with 30 days' advance notice - advertised in the publications listed in the public notice section - of an opportunity to comment whenever a substantial amendment is being proposed for the City of South Jordan CDBG program. The City of South Jordan shall consider any comments received in preparing substantial amendments. A summary of all comments received shall be attached to any substantial amendment of the plan. Any comments that are not accepted (that is, comments that do not result in changes to the amendment) and the reasons thereof shall be included in this summary.

Allowed Changes During COVID-19

During the COVID-19 pandemic, the Coronavirus Aid, Relief, and Economic Security (CARES) Act allows for several changes. Per HUD's information, the following provisions apply and override their respective counterparts in this plan while HUD allows them.

- Deadlines for the submission of the FY19 and FY20 Con Plan and Actions plans is extended to August 16, 2021.
- The 15% cap on public services is suspended for FY19 and FY20 CDBG funds.
- Public comment periods for all items herein are decreased to 5-days.
- Virtual public hearings are allowed.

Any forthcoming waivers and changes by HUD during the pandemic and following recovery efforts will be considered to automatically apply to this Plan without requiring an amendment, as long as such changes are in line with the HUD guidelines.

Access to Records

The City of South Jordan shall provide citizens, public agencies and other interested parties with reasonable and timely access to information and records relating to the Consolidated Plan and the City's use of resources under the CDBG program during the preceding five years (or as many years as the City has been administering the program, if less).

Standard Documents

Standard documents include copies of the proposed and final Annual Action Plans, the proposed and final Consolidated Plan, proposed and final substantial amendments, the Consolidated Annual Performance and Evaluation Report, the Citizen Participation Plan, as well as information regarding use of funds and other program information will be maintained by City of South Jordan staff.

Availability to the Public

The public may access standard documents by contacting the Finance Department, CDBG Program, City Hall, 1600 W. Towne Center Drive (10610 S), South Jordan, UT, 84095, (801)-446-4357, 8:00 a.m. to 5:00 p.m., Monday through Friday. Reasonable accommodation for persons with disabilities will be made upon request. Any interested party may receive copies of standard documents at no cost. Documents may also be downloaded from the City of South Jordan website.

Complaints and Grievances

The City of South Jordan will provide written responses to written complaints and grievances received regarding any aspect of the annual Consolidated Plan federal

entitlement grant program within 15 working days, where practicable, of receiving the complaint or grievance. Comments, complaints, and grievances concerning the Consolidated Plan, Annual Action Plan, or CAPER should be addressed to the Finance Department specifying the CDBG program as the subject of the complaint.

Technical Assistance

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

- Answer, in writing or verbally, all inquiries received from citizens or representative groups relating to funding requests.
- Meet with groups or individuals as appropriate, to assist in identifying specific needs and to assist in preparing request/ application for assistance.
- Provide bilingual translation on as needed basis.

Anti-Displacement

In the event that any residential displacement and relocation must take place in order to carry out a program activity, the City of South Jordan ensures that it will develop an Anti-displacement and Relocation Plan in connection with that project as applicable per Federal regulations.

In the event that any acquisition and relocation must take place in order to carry out a program activity, South Jordan will also comply with the acquisition and relocation requirements of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1070, as amended and implementing regulations of 49 CFR Part 24.

Definitions

For purposes of the CDBG program, the following definitions will apply:

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

Consolidated Plan (CP): The Consolidated Plan is a five-year planning document for the CDBG program. The CP must contain a housing and community development needs assessment, a five- year strategic plan to address the needs identified, a one-year action plan to identify specify activities and planned use of CDBG funds. The CP is due at HUD 45 days before the beginning of a program year. The City of South Jordan CDBG program begins annually on July 1, making the CP due at HUD no later than May 17 of each year.

Consolidated Annual Performance Evaluation Report (CAPER): CAPER is an annual report summarizing the City's progress in implementing Consolidated Plan. CAPER is due at HUD 90 days after the close of a program year. For the City of South Jordan, each program year ends on June 30, making the CAPER due at HUD no later than September 28 of each year.

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

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

- ***Extremely Low-Income*** - 0-30% Area median income (AMII) adjusted for household size
- ***Low Income*** - 31-50% AMI adjusted for household size.
- ***Moderate-Income*** - 51-80% AMI adjusted for household size

Low- and Moderate-Income Neighborhood - Generally defined as a census tract(s) or block group(s) in which a minimum of 51 percent of the residents have an income not exceeding 80 percent of the area median family income. HUD offers exceptions in some areas, in which HUD determines a new percentage that qualifies. Where such an exception is granted, qualifying areas shall be referred to as low- and moderate-income neighborhoods.

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

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