

SARASOTA CONSORTIUM **CITIZEN PARTICIPATION PLAN**

• Introduction

In accordance with 24 CFR Section 91.105 and 24 CFR Part 91.401, the Sarasota Office of Housing and Community Development has prepared this Citizen Participation Plan to provide for and encourage citizens to participate in the development of the Consolidated Plan, any substantial amendments to the Consolidated Plan and the submission of the annual Consolidated Annual Performance and Evaluation Report.

The Citizen Participation Plan is designed to encourage participation by low and moderate income persons, particularly those living in slum and blighted areas and in areas where Community Development Block Grant (CDBG) funds are proposed to be used and by residents of predominantly low and moderate income neighborhoods. A low and moderate income neighborhood is defined in the City of Sarasota as a neighborhood where a majority of residents earn less than 50% of the Area Median Income and in Sarasota County, those neighborhoods meeting the U.S. Department of Housing and Urban Development (HUD) exception criteria.

The Sarasota Consortium will encourage the participation of all of its citizens, including minorities and non-English speaking persons, as well as persons with disabilities. The Sarasota Consortium will encourage the participation of local and regional institutions and other organizations (including businesses, developers, and community and faith-based organizations) in the process of developing and implementing the Consolidated Plan.

Finally, the Sarasota Consortium will encourage, in consultation with public housing agencies, the participation of residents of public and assisted housing development in the process of developing and implementing the Consolidated Plan along with other low income residents of targeted revitalization areas in which the developments are located.

The Sarasota County Commission (County) and the City of Sarasota Commission (City) have formed a consortium of geographically contiguous units of local governments for the purpose of administering housing and community development activities. The County and the City through Interlocal Agreements have committed to jointly administer the Community Development Block Grant (CDBG), the HOME Investment Partnerships (HOME) program, the Emergency Solutions Grant (ESG), the Neighborhood Stabilization Grants (NSP) and the State Housing Initiatives Partnership (SHIP) program through the Sarasota Office of Housing and Community Development.

The City and the County are responsible for the adoption of a Citizen Participation Plan setting forth the policies and procedures for citizen participation in the preparation of the Consolidated Plan. This adopted plan applies to both the City and the County.

• **Development of the Citizen Participation Plan**

Introduction

This Citizen Participation Plan replaces and updates an existing Citizen Participation Plan. The Department of Housing and Urban Development (HUD) requires that citizens be given an opportunity to comment on any amendment to the Citizen Participation Plan. HUD has not specified how citizen comments must be obtained, however HUD does state that the opportunity to comment must “not (be) clearly unreasonable”.

Sarasota used the same public process for amending the Consolidated Plan to amend the Citizen Participation Plan. The proposed amended Citizen Participation plan was published on the Office of Housing and Community Development’s website. Citizens were then given 30 calendar days to comment on the amendment. The 30 day comment period began on the date the proposed amendment to the Citizen Participation Plan was published on the Office of Housing and Community Development website.

In addition, all neighborhood associations, the Continuum of Care and the two local housing authorities were sent an e-mail providing them with the website location where the entire proposed Citizen Participation Plan could be examined.

• **Development of the Consolidated Plan**

Public Meetings

The Sarasota Consortium will conduct two public meetings prior to the publication of the proposed Consolidated Plan to obtain the views of citizens on housing and community development needs, including priority non housing community development needs. One public meeting will be located in the City of Sarasota and the other public meeting will be located in the Sarasota Urban County (defined as unincorporated Sarasota County and the cities of North Port and Venice). The Sarasota Urban County public meeting site will be located in south Sarasota County, defined as being south of Blackburn Point Road.

The process that the Consortium will use to advertise the public meeting is detailed in the public meeting section of this Citizen Participation Plan.

Commission Review of the Proposed Consolidated Plan

The City and County Commissions will review the proposed Consolidated Plan and authorize the plan to be advertised. Citizens will be given the opportunity to comment on the proposed Consolidated Plan at the commission meeting using the process for public comment adopted by each jurisdiction.

Publication of the Proposed Consolidated Plan for Public Comment

At least 30 days prior to the City and County adopting the proposed Consolidated Plan, the Sarasota Consortium will publish the proposed Consolidated Plan for public comment. The proposed Consolidated Plan will include the amount of assistance that the Sarasota Consortium will receive (including grant funds and program income), the range of activities that are proposed to be undertaken, including the estimated amount that will benefit persons of low and moderate income. In addition, the Sarasota Consortium will make available Sarasota's plans to minimize displacement of persons and to assist any persons displaced, specifying the types and levels of assistance that Sarasota will make available (or require others to make available) to persons displaced, even if Sarasota expects no displacement to occur. The proposed Consolidated Plan will be published in a manner that affords citizens, public agencies and other interested parties an opportunity to examine its contents and to submit comments through the following actions:

At least 30 days prior to adopting the Consolidated Plan, the Sarasota Consortium will publish a summary of the proposed Consolidated Plan in the newspaper of general circulation, *Sarasota Herald Tribune*. The summary will be placed in local section of the newspaper and will describe the contents and purpose of the Consolidated Plan and a list of locations where copies of the entire proposed Consolidated Plan may be examined. The notice will also specify the deadline and location where comments should be submitted.

The proposed Consolidated Plan will be placed on the Office of Housing and Community Development's website in a format for citizens to examine or download. The format will be compatible with web readers for the visually impaired as required by 24 CFR Part 8. Citizens will be provided with both an e-mail address and a physical address where they may submit written comments. The following entities will be sent an e-mail or letter showing the website where the proposed Consolidated Plan is located:

- The City of Sarasota and Sarasota County list of neighborhood associations (to encourage participation by low and moderate income persons, particularly those living in slum and blighted areas and in areas where CDBG funds are proposed to be used, residents of predominantly low and moderate income neighborhoods and by other low income residents of targeted revitalization areas in which public and assisted is located);
- The Continuum of Care, who will be asked to disseminate the information to its members (to encourage participation by agencies providing services to the homeless);
- The Sarasota and Venice Housing Authority, who will be asked to disseminate the information to its resident associations (to encourage participation by residents of public and assisted housing);

- The nonprofit agencies who are proposed to receive funding in the proposed Consolidated Plan;
- Adjacent local governments (Manatee, DeSoto and Charlotte Counties);
- The Town of Longboat Key;
- The Sarasota NAACP (to encourage participation by minorities);
- The Suncoast Center for Independent Living, Community Haven and the Loveland Center (to encourage participation by persons with disabilities);
- The Latin American Chamber of Commerce (to encourage participation by minorities and non-English speaking persons);
- The Manatee – Sarasota Building Industry Association (to encourage participation by developers);
- The Sarasota Ministerial Alliance (to encourage participation by faith based organizations); and
- Private Citizens who request information on the Consolidated Plan process.

Notices related to the publication of the proposed Consolidated Plan and the meetings to provide comments about the proposed Consolidated Plan may be combined.

Hard copies of the proposed Consolidated Plan will be placed in all Sarasota County libraries, the Sarasota County Board Records Office, the Sarasota City Auditor and Clerk's Office, the Newtown Redevelopment Office, at the Sarasota and Venice Housing Authority main offices and at the Sarasota Office of Housing and Community Development (OHCD).

Hard copies of the proposed Consolidated Plan will also be mailed to the City Managers of cities that are members of the Sarasota Urban County (the cities of North Port and Venice).

The Consortium will provide up to 5 free copies of the plan to citizens and interested parties upon request.

Upon request, large print copies of the proposed Consolidated Plan will be sent to visually impaired residents and copies of the proposed Consolidated Plan will be mailed to homebound residents.

Public Comment Period

The public comment period will be not less than 30 days. The period will begin on the date that the proposed Consolidated Plan is published in the newspaper of general circulation and will end on the date shown in that notice.

Public Meetings

The Sarasota Consortium will conduct two public meetings following to the publication of the proposed Consolidated Plan to obtain the views of citizens on the proposed Consolidated Plan. One public meeting will be located in the City of Sarasota and the

other public meeting will be located in the Sarasota Urban County. The Sarasota Urban County public meeting site will be located in south Sarasota County.

The process that the Consortium will use to advertise the public meeting is detailed in the public meeting section of this Citizen's Participation Plan.

Public Comment Consideration

The Sarasota Consortium will consider any comments or views of citizens received in writing or orally at the public meetings in preparing the final Consolidated Plan. Summaries of all comments will be provided to the City and County Commissions prior to their formal adoption of the Consolidated Plan.

A summary of all comments or views received during the public comment period and a summary of any comments or view not accepted and the reasons the comments were not accepted will be attached to the final Consolidated Plan.

Adopted Consolidated Plan

The adopted Consolidated Plan will be posted on the Office of Housing and Community Development's website. The format will be compatible with web readers for the visually impaired as required by 24 CFR Part 8.

• Substantial Amendments

Introduction

The Consolidated Plan may be amended in order to make a substantial change in allocation priorities, in the method of distributing federal funds, or to carry out any activity using federal funds from program income that was not described in the Consolidated Plan. The City and County will provide for and encourage citizens to participate in the development of a substantial amendment by giving citizens reasonable notice and an opportunity to comment on the amendment prior to it being submitted to the U.S. Department of Housing and Urban Development (HUD).

The Criteria for a Substantial Amendment

The criterion for determining whether a change is considered a "Substantial Amendment" is as follows:

- An activity contained in an approved Consolidated Plan is being totally eliminated; or
- A new activity is being added to the Consolidated Plan; or
- When the service area, budget, or beneficiaries are changed so that 50 percent or more of the intended beneficiaries no longer benefit from the project; or

- Changes in the use of Community Development Block Grant (CDBG) funds from one eligible activity to another.

A substantial amendment does not occur when the City and / or County is changing the use of CDBG funds from one activity to another when the change is being made solely because the activity was completed under budget or if additional funding is needed to complete an approved activity.

Public Notice of a Substantial Amendment

All substantial amendments will be published on the City of Sarasota's Office of Housing and Community Development website to give citizens, public agencies and other interested parties reasonable notice and the opportunity to comment on the substantial amendment. Citizens will be given at least 30 days to comment on the substantial amendment. The 30 day period will begin after the proposed substantial amendment is published on the Office of Housing and Community Development website.

E-mail notices will be sent to the organizations listed in the publication section of the Development of the Consolidated Plan, above, that are directly impacted by the substantial amendment.

Upon request, large print copies of the proposed substantial amendment will be sent to visually impaired residents and copies of the proposed substantial amendment will be mailed to homebound residents.

Public Comment Period

The City and / or County will consider any comments or views of citizens received in writing, or orally at any public meetings that may be conducted during the public comment period when preparing the substantial amendment for the approval of the City and / or County Commissions. Summaries of all comments will be provided to the City and County Commissions prior to their formal adoption of the substantial amendment.

A summary of all comments or views received during the public comment period and a summary of any comments or view not accepted and the reasons the comments were not accepted will be attached to the substantial amendment of the Consolidated Plan.

Adopted Substantial Amendments

All adopted substantial amendments will be posted on the Office of Housing and Community Development's website. The format will be compatible with web readers for the visually impaired as required by 24 CFR Part 8.

• **Consolidated Annual Performance and Evaluation Report (CAPER)**

Publication of the Consolidated Annual Performance and Evaluation Report for Public Comment

The City and County will provide for and encourage citizens to participate in the development of the CAPER by giving citizens reasonable notice and an opportunity to comment on the report prior to it being submitted to the U.S. Department of Housing and Urban Development (HUD). The Office of Housing and Community Development will afford citizens an opportunity to examine and comment on the proposed CAPER through the following actions:

At least 15 days prior to submitting the CAPER to HUD, the Office of Housing and Community Development will publish a notice that the draft CAPER is available for review in the newspaper of general circulation, the *Sarasota Herald Tribune*. The notice will be placed in local section of the newspaper and CAPER will describe where a copy of the draft CAPER may be reviewed. The notice will also specify the deadline and location where comments should be submitted. The notices about the DRAFT CAPER and the notices on the public meetings on the CAPER may be combined.

The draft CAPER will be placed on the Office of Housing and Community Development's website in a format for citizens to examine or download. Citizens will be provided with both an e-mail address and a physical address where they may submit comments.

Upon request, large print copies of the draft CAPER will be sent to visually impaired residents and copies of the draft CAPER will be mailed to homebound residents.

Public Comment Period

The public comment period will be not less than 15 days before the report is submitted to HUD. The period will begin on the date that the notice is published in the newspaper of general circulation that that the CAPER is available for public review and will end on the date shown in that notice.

Public Meetings

The Sarasota Consortium will conduct two public meetings to obtain the views of citizens on the draft CAPER. One public meeting will be located in the City of Sarasota and the other public meeting will be located in the Sarasota Urban County. The Sarasota Urban County public meeting site will be located in south Sarasota County.

The process that the Consortium will use to advertise the public meeting is detailed in the public meeting section of this Citizen's Participation Plan.

Public Comment Consideration

The Sarasota Consortium will consider any comments or views of citizens received in writing or orally at the public meetings in preparing the CAPER.

A summary of all comments or views received during the public comment period will be attached to the CAPER.

Final Consolidated Performance and Evaluation Report

The final CAPER will be posted on the Office of Housing and Community Development's website. The format will be compatible with web readers for the visually impaired as required by 24 CFR Part 8.

• Public Meetings

As described above, the Consortium will conduct six public meetings per year to obtain citizens' views and to respond to proposals and questions. These public meetings will be conducted at three different stages of the program year. The first set of meetings will address housing and community development needs and will be conducted at least 30 days before the proposed Consolidated Plan is published for comment. The second set of meetings will address the development of the proposed activities and the final set of meetings will review program performance. Three of the meetings will be located in the City of Sarasota and three of the meetings will be located in a location south of Blackburn Point Road to make the locations convenient to potential and actual beneficiaries.

All public meetings will be advertised on the Office of Housing and Community Development website and in a display ad in the *Sarasota Herald-Tribune*. The ads in the *Sarasota Herald-Tribune* will be published at least two weeks before the date of the public meeting. The ads will contain sufficient information about the subject of the public meeting to permit informed comment.

In addition, e-mail notices will be sent to the following:

- The City of Sarasota and Sarasota County list of neighborhood associations (to encourage participation by low and moderate income persons, particularly those living in slum and blighted areas and in areas where CDBG funds are proposed to be used, residents of predominantly low and moderate income neighborhoods and by other low income residents of targeted revitalization areas in which public and assisted is located);
- The Continuum of Care, who will be asked to disseminate the information to its members (to encourage participation by agencies providing services to the homeless);

- The Sarasota and Venice Housing Authority, who will be asked to disseminate the information to its resident associations (to encourage participation by residents of public and assisted housing);
- The nonprofit agencies who are proposed to receive funding in the proposed Consolidated Plan;
- Adjacent local governments (Manatee, DeSoto and Charlotte Counties);
- The Town of Longboat Key;
- The Sarasota NAACP (to encourage participation by minorities);
- The Suncoast Center for Independent Living, Community Haven and the Loveland Center (to encourage participation by persons with disabilities);
- The Latin American Chamber of Commerce (to encourage participation by minorities and non-English speaking persons);
- The Regional Planning Council (to encourage the participation of regional institutions);
- The Englewood, North Port, Sarasota and Venice Chambers of Commerce (to encourage the participation of businesses);
- The nonprofit housing agencies who have received funding during the past five years (to encourage participation by developers);
- The Manatee - Sarasota Building Industry Association (to encourage participation by developers);
- The Sarasota Ministerial Association (to encourage participation by faith based organizations); and
- Private citizens who request information on the Consolidated Plan process.

All public meetings will be held on a weekday evening, after 5:30 pm, or on a Saturday morning. All public meetings will be held in a public place such as a municipal building, library or in locations convenient to potential and actual beneficiaries that are accessible to persons with physical disabilities.

Interpreter services in language other than English or sign interpreters for the hearing impaired will be provided upon advance request to the Sarasota Office of Housing and Community Development. This advance notice must be received a minimum of ten days prior to the public meeting.

• **Miscellaneous Citizen Participation Requirements**

Meetings of the City of Sarasota Commission and Sarasota County Commission to discuss the Consolidated Plan and substantial amendments to the Consolidated Plan will be held in accessible locations and advertised in conformance with state law to provide citizens with reasonable and timely access to these meetings.

Meetings related to the development and implementation of the Consolidated Plan that are open to the public and conducted by the Office of Housing and Community Development will be noticed in compliance with state law and will be held in accessible locations to provide citizens with reasonable and timely access to these meetings.

- **Availability to the Public**

The Sarasota Consortium will make the adopted Consolidated Plan, any substantial amendments, and CAPER available to the public by publishing them on the Office of Housing and Community Development website. Upon request, large print copies of the Consolidated Plan will be sent to visually impaired residents and copies of the Consolidated Plan will be mailed to homebound residents.

- **Access to Records**

The Office of Housing and Community Development will provide citizens, public agencies, and other interested parties with reasonable and timely access to information and records related to the Consolidated Plan and Sarasota's use of assistance under the programs covered by the Consolidated Plan during the preceding five years in accordance with requirements of the Florida Public Records Act.

- **Technical Assistance**

The Office of Housing and Community Development will provide technical assistance to groups representative of persons of low- and moderate-income persons that request help in developing proposals for funding assistance covered by any of the programs covered by the Consolidated Plan. Technical Assistance will be limited to providing information about the availability of funds and information on how to complete an application for funding. The Sarasota Consortium will not prepare applications for funding for any group. Providing technical assistance does not include the provision of funds to the groups.

- **Complaints**

All formal complaints related to the Consolidated Plan, amendments and CAPER must be submitted, in writing, to the Director of the Sarasota Office of Housing and Community Development. The Office of Housing and Community Development will review the complaint and will issue a timely, substantive written response to every written complaint within 15 working days, where practicable.

In the event the individual is not satisfied with the response, they may ask the City / County Management team, in writing, to review the complaint and response. The City / County Management team will review the complaint and original response and make a written response within 15 days following the City / County Management Team meeting, where practicable.

- **Anti-Displacement**

The Consortium will seek to minimize displacement of persons and will assist persons displaced as a result of any housing and community development activity. Copies of the current Anti-Displacement Plans are included in the Consolidated Plan in the “Anti-Displacement Plans” Section.

- **Adoption of the Citizen Participation Plan**

This Citizen Participation Plan was adopted by the City of Sarasota on July 20, 2015.

This Citizen Participation Plan was adopted by Sarasota County on July 14, 2015.