

City of Sandy Springs Citizen Participation Plan

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Introduction

The City of Sandy Springs is committed to encouraging its citizens to participate in the planning, implementation and assessment of the performance of its federal community development, housing or other federally-funded programs.

As required by federal regulations 24 CFR Part 91.105, the City of Sandy Springs (the "City") has developed this Citizen Participation Plan (the "Plan") to ensure citizen input is integral to planning how the City will use federal funds received annually from the U.S. Department of Housing and Urban Development (HUD). When the City adopted its first Plan on June 20, 2006, these requirements were intended to only apply to the City's participation in the Community Development Block Grant (CDBG) Program. In anticipation of receiving HUD funds from other programs, the City has amended this Plan to apply to any future HUD programs in which the City may participate, including HOME, ESG, HOPWA, NSP, the Section 108 Loan Guarantee Program or others where public participation, notification and reporting requirements must be met.

The Community Development Department has primary responsibility for managing the citizen participation process, the development and implementation of programs and the reporting of annual accomplishments referenced in this Citizen Participation Plan.

Citizen Participation Plan

The goal of the Citizen Participation Plan is to fully integrate citizen input into the participation, planning and reporting activities required to successfully manage the City's HUD programs. These activities include developing the following:

1. Any amendment to this Citizen Participation Plan;
2. A five-year Consolidated Plan;
3. Each year's Action Plan;
4. All Annual Performance Reports; and
5. Any substantial amendment to the Consolidated Plan or Annual Action Plan
6. Completion of the Assessment of Fair Housing (AFH) and substantial revisions to the AFH

The City considers it important to the success of its Consolidated Plan, Action Plans, Annual reports, and Assessment of Fair Housing (AFH) as well as other program activities to allow for citizen comment on the proposed uses of HUD funds, and the City will take appropriate actions to encourage the participation of residents who are intended to directly benefit from these federal funds. These may include minority residents and those who do not speak English, persons with

disabilities, residents of areas the City has designated as low- and moderate-income or target areas where Community Development Block Grant (CDBG) or other funds will be used.

The City may enlist nonprofit and community organizations, resident associations, housing and human service agencies and other groups to assist the City with fully engaging City residents in the planning and implementation of its federal programs. In addition, the Community Development Department will partner with the City's Communications and Media Department to further this goal. Advertising and outreach to residents may include newsletters, press releases and web notices, along with other print or electronic materials to increase citizen input in the planning and ongoing performance of the City's federal programs.

Consolidated Plan/Annual Action Plan/Assessment of Fair Housing (AFH)

In order to receive an annual allocation of federal funds from HUD, the City must submit a Consolidated Plan, which serves as the five-year strategic plan outlining the goals to be achieved. To implement the City's five-year goals, an Action Plan is submitted to HUD each year describing the location, cost, proposed accomplishments and other information related to each project or program. Federal regulations require that these funds be targeted where they will provide the greatest benefit to those residents who are meant to receive HUD assistance, primarily the City's low- and moderate-income residents.

In 2015, The U.S Department of Housing and Urban Development (HUD) established the new AFFH rule to enhance the regulatory framework of the 1968 Fair Housing Act. The AFFH Rule requires the City to complete the Assessment of Fair Housing (AFH), to ensure the City is taking meaningful action to combat patterns of segregation, promote fair housing choice, and foster inclusive communities. The AFFH rule also requires the City to conduct the appropriate community participation and consultation with other public and private service providers as well as advocate groups as part of the fair housing planning process as described in its Citizen Participation Plan. The City also will make HUD-provided data and any other supplemental information the City plans to incorporate into its AFH available to its residents, public agencies, and any other interested parties. The City may make the HUD-provided data available to the public by cross-referencing to the data on HUD's website.

The City will use a combination of consultations with other agencies, public hearings, the solicitation of written comments and other methods of public engagement throughout the process of developing its Consolidated Plan, Annual Action Plans, AFH or substantial revisions to the AFH as its strategy for securing

citizen input. The City shall also inform any Public Housing Agency (PHA) in the development and implementation of the AFH and when the Consolidated Plan may impact any public housing development, or the surrounding community, so this information may be included in the PHA's annual Comprehensive Grant program application.

Whenever the City elects to participate in other HUD programs, or make applications for additional funds not originally anticipated at the time of the adoption of its current Consolidated Plan or the Action Plan, the public notice requirements outlined in the Plan shall apply and the public will be encouraged to comment on the City's participation and planned uses of those funds.

Public Comment, Public Notice and Public Hearings

To encourage citizen input when developing or amending its Citizen Participation Plan, the City will make the plan available for public comment. The plan can be provided in alternative formats for the disabled, and to those residents who are non-English speaking, upon request and with adequate notice.

In addition to the Citizen Participation Plan, the City of Sandy Springs will also publish its Consolidated Plan, Annual Action Plan, any substantial amendments and Annual Performance Report, AFH and substantial revisions to the AFH for public comment prior to submitting these documents to HUD. A minimum of two public hearings will be held each program year to solicit citizen views. This is to ensure that the City follows its Citizen Participation Plan and fully integrates citizen input into these documents to ensure the best application of HUD funds to community needs. Included in the Annual Action Plan will be the anticipated CDBG, or other HUD funds, that the City reasonably expects to receive each year, and the estimated benefit to low- and moderate-income residents.

It is required by federal regulations 24 CFR Part 91.105(b)(1) that the City also describe how it will address any HUD-funded project or program that may displace residents. This must include how the City will assist any displaced person and the levels of assistance to be provided even if the City anticipates no displacement through its HUD-funded activities. In response to this requirement, the City developed and adopted an anti-displacement policy to meet HUD requirements prior to the initiation of any federally-funded activity that may displace any City resident. This policy describes actions to be taken to minimize displacement and levels of benefit to be afforded those residents who may be displaced. The City's anti-displacement policy was adopted on June 17, 2008, and included with the City's 2008-12 Consolidated Plan and 2008 Action Plan submitted to HUD.

Public Notice Advertisement

The City of Sandy Springs will publish opportunities for its citizen's to comment on its HUD-funded activities to maximize the performance of its community development programs. Notices to solicit comments from Sandy Springs residents will be published in the *Sandy Springs Neighbor* as the City's media resource for all legal notices and publications (Resolution No. 2019-01-08). In addition, public notices may be advertised in, *Mundo Hispanico*, and through direct mailings and email notifications to those citizens or organizations who have requested such notification.

Public notices will be published at least 15 calendar days prior to a public meeting, public hearing or other event designed to gather citizen input on the City's HUD-funded activities. In addition, the Office of the City Clerk will post notices of pending meetings according to the Georgia Open Meetings Act as published at O.C.G.A. §50-14-1 through §50-14-6. Additional public announcements will be coordinated with the City's Communications and Media Department as necessary.

When soliciting input for the City's Consolidated Plan, Annual Action Plan, substantial amendments or Annual Performance Report, AFH or substantial AFH revision a summary description of each will be provided in each public notice for informational purposes with complete copies of each document referenced in the notice available for review by citizens at the following locations:

Community Development Department
Sandy Springs City Hall
1 Galambos Way
Sandy Springs, GA 30328
770.730.5600

Community Assistance Center
1130 Hightower Trail
Sandy Springs, GA 30350
770.552.4889

Dorothy C. Benson Senior Multipurpose Complex
6500 Vernon Woods Drive
Sandy Springs, GA 30328
404.705.4900

The City of Sandy Springs will provide a reasonable number of free copies of each document for those who wish copies with sufficient notice. Each document

will also be available on the City's website at www.sandyspringsga.org under the Community Development Department. The Community Development Block Grant Program is accessed through this webpage and program documents are posted there for citizen review and comment. Citizens who may require this information in alternative formats may contact the Department of Community Development at 770-730-5600.

Consolidated Plan /Annual Action Plan/ Assessment of Fair Housing (AFH) Public Hearings

Prior to the development of the draft Consolidated Plan, Annual Action Plan, a plan amendment, AFH or substantial AFH revisions, or an application for program funds not anticipated in a current plan, the City will hold a public hearing. The intent of this public hearing is to obtain citizen views, discuss the City's participation in HUD programs and respond to related questions. It is also an opportunity for citizens to discuss community needs and goals that can be addressed using HUD funds in a public forum before the Sandy Springs City Council.

All public hearings will be held at the Sandy Springs City Hall to provide reasonable and timely access to persons who may be actual or potential beneficiaries, as well as to those who may be disabled and require special accommodations to participate. Translation services will be made available where it is reasonably anticipated there will be a significant number of non-English speaking residents in attendance or if such services have been requested. However, citizens who require such services should contact the Department of Community Development at least seven calendar days prior to the scheduled public hearing at 770-730-5600.

Citizen input will be used to inform decisions on how the City can maximize the performance of its HUD-funded activities as it prepares a draft of the Consolidated Plan, Action Plan or other funding applications. This draft will be published for a minimum 30-day public comment period prior to final plan or application adoption by the Sandy Springs City Council.

Public comments are encouraged throughout the plan or application development process, and the outcome of their consideration by the City, will be included as attachments to the adopted plan or application that is submitted to HUD. All written comments submitted shall receive a timely, substantial response by the City within 15 calendar days of receipt.

In the event that national or local health officials recommend social distancing and/or limited public gatherings for public health reasons, virtual or web-based hearings will be used in lieu of in-person hearings. If this format is used,

accommodations for real-time responses, timely responses from local officials to all citizen questions and issues, public access to all questions and response and accommodations for persons with disabilities or limited English proficiency will be made to the greatest extent possible.

The hearings generally address housing, social, and community development needs, proposed activities and the review of program performance. On the day of the public hearing, comments may be submitted in writing or made orally during the hearing.

Notices During A Disaster Or State Of Emergency

In the event of certain disasters or emergencies HUD may provide waivers and or alternative requirements relative to public notification processes. In such events, the City will avail itself of any alternatives, provided that will help in the expediting notifications for the delivery of assistance to the communities.

Plan Amendments

Over the course of the City's program year, it may be necessary to amend the adopted Consolidated Plan or Annual Action Plan due to a change in purpose, scope, location, budget, beneficiaries or other conditions, as published in either plan. HUD regulations state that the City must define the criteria that trigger an amendment to the Consolidated Plan or Annual Action Plan in its Citizen Participation Plan.

However, cities are given flexibility by HUD to define what constitutes a program substantial amendment. For the purposes of the City of Sandy Springs' Consolidated Plan and Annual Action Plan, a substantial amendment shall be defined as:

1. Any budgetary change in activity under the current Consolidated Plan or Annual Action Plan that increases or decreases the pre-amendment funding for a project, program or other activity by 50%; or
2. Any change to the existing Consolidated Plan or Annual Action Plan that adds a new priority, project, program or funding, not considered at the time of the original plan's adoption, in order to undertake new activities during that fiscal year;
3. Any change in either plan that reallocates CDBG funds from one eligible activity to another; or

4. City participation in a new program or activity where HUD regulations specifically require the Citizen Participation Plan, Consolidated Plan and/or Action Plan be amended, such as the Section 108 Loan Guarantee Program regulations 24 CFR Part 570.704(a)(2).

This Plan may be changed from time to time to enhance clarity, enhance the process for encouraging constructive citizen participation, or to incorporate requirements, waivers, or flexibilities allowed by HUD or other federal entities. Some changes are considered substantial changes. Substantial changes consist of changes to comply with federal amendments.

When substantial changes are made to the CPP, a summary of the changes will be provided, allowing citizens a reasonable opportunity to comment. The entire document will be available with the Consolidated Plan and Action Plan. The amended CPP will be adopted following the fifteen day public comment period, or the applicable shortened period allowed by HUD through the special waivers or flexibilities. – 5 day comment period for special waivers or flexibilities.

Revising an accepted AFH- HUD regulations state that the City must specify the criteria that will be used for determining when a substantial revisions to the AFH will be required. An AFH previously accepted by HUD must be revised and submitted to HUD for review under the following circumstances, which would constitute a substantial revision:

- A material change occurs. A material change is a change in circumstances in the City that affects the information on which the AFH is based to the extent that the analysis, the fair housing contributing factors, or the priorities and goals of the AFH no longer reflect actual circumstances. Examples include presidentially declared disasters, under title IV of the Robert T. Stafford Disaster Relief and Emergency Assistance Act (42. U.S.C. 5121), in the City's area that are of such a nature as to significantly impact the steps the City may need to take to affirmatively further fair housing; significant demographic changes; new significant contributing factors in the City; and civil rights findings, determinations, settlements (including Voluntary Compliance Agreements), or court orders; or
- Upon HUD's written notification specifying a material change that requires the revision.

A revision to an accepted AFH consists of preparing and submitting amended analyses, assessments, priorities, and goals that take into account the material change including any new fair housing issues and contributing factors that may arise as a result of the material change. A revision may not necessarily require

the submission of an entirely new AFH. The revision need only focus on the material change and appropriate adjustments to the analyses, assessments, priorities, or goals. Revisions to an AFH are subject to community participation. The City shall follow the notice and comment requirements specified in the City's Participation Plan.

The City will follow the public notice and comment policies described in this Plan when a revision to an adopted Consolidated Plan, Annual Action Plan, and revisions to an accepted AFH or other HUD requirement triggers a substantial amendment or revision. Public comments on substantial amendments and AFH substantial revisions are also subject to a 30-day review and comment period. Citizens who may require a copy of the amendment in an alternative format may call the Department of Community Development at 770-730-5600.

Any comments received by the City on the substantial amendment shall be considered when preparing the final amendment for adoption by the Sandy Springs City Council. Comments on the amendment, and the outcome of the City's consideration, shall be included at the time of adoption by City Council. All adopted substantial amendments will be forwarded to HUD as attachments to the amended Consolidated Plan or Annual Action Plan.

Other amendments to the Consolidated Plan, Annual Action Plan, or revisions to the AFH that do not meet the definition of substantial amendments or AFH substantial revision criteria may be made by the Community Development Department and are not subject to public notice or comment requirements. However, the department may elect to advertise what would be considered a "minor" amendment when opportunities for additional public comments are desirable. A minor amendment would be defined as a change that meets these criteria, but does not rise to the level of other actions which trigger a substantial amendment, advertising and public comment.

Performance Reports

An integral part of measuring the success of the City's HUD-funded activities is the publication of an Annual Performance Report. This report provides an objective assessment of the City's progress toward meeting the Consolidated Plan's five-year goals through yearly Action Plan activities. The City will publish a draft of its Annual Performance Report for citizen review and comment prior to adoption of the report by the Sandy Springs City Council. A 15-day public comment and review period will be provided for citizens to comment on the City's program performance each year. Citizens who may require a copy of the Annual Performance Report in an alternative format may call the Department of Community Development at 770-730-5600.

Any comments received by the City on the Annual Performance Report will be included in a draft report submitted to the Sandy Springs City Council prior to the Council adopting a final report. A public hearing will be provided at a regularly scheduled City Council meeting for citizens to provide input on the City's annual performance report. Any comments on the report, and the outcome of the City's consideration, will be included in the report submitted to City Council for final adoption. The adopted report will be forwarded to HUD as the City's official performance and accomplishments report for the applicable program year.

Document Retention

HUD regulations 24 CFR Part 91.105(g) require that the Plan describe how the City's Consolidated Plan, Annual Action Plan, any substantial amendments, Annual Performance Reports, AFH or AFH revisions, as well as any documents associated with a Section 108 loan will be retained for a 5 year retention period. The Citizen Participation Plan initially adopted June 20, 2006, describes these document retention policies. All documents developed in response to Sandy Springs participation in HUD's entitlement or other programs will be retained according to these policies and are available for review with sufficient notice. Citizens wishing to examine program documents should contact the Department of Community Development at 770-730-5600. The department requests that at least three days prior notice be given to allow staff to assist with document retrieval and to be present at the time of review to assist those interested in the documents.

Confidentiality

At some undetermined future date, the City may elect to use its federal funds to leverage private resources that may require the submission of proprietary information. To ensure confidentiality, such information shall be exempted from review to the fullest extent permitted by law. The City will also take all necessary measures to ensure that sensitive beneficiary information that may be contained within the department's files is in compliance with all federal, state and local privacy requirements.

Technical Assistance

Upon request, the Department of Community Development will provide technical assistance to any group representative of persons of low- and moderate-income interested in developing proposals for funding assistance under any of the programs covered by the Consolidated Plan. The Community Development Department may determine, at its discretion, the level and type of assistance

following consultation with those who are requesting technical assistance. Technical assistance will be provided in this capacity only in response to any RFP the City may develop related to its federal programs, upon request. However, general requests for information are welcome and may be directed to the department as needed or submitted to the cdbgprogram@sandyspringsga.org mailbox.

Complaint Procedures

The City of Sandy Springs encourages its citizens to provide ongoing feedback related to the planning and administration of its federal programs. Should a citizen have concerns related to the Citizen Participation Plan, Consolidated Plan, Annual Action Plan, any substantial amendments, Annual Performance Report, AFH or AFH revision or any other federal program document or procedure, the City welcomes concerns or complaints to be submitted in writing. The City will provide a timely, substantive written response to every citizen complaint, within 15 working days, where practicable, as required by federal regulations. Written complaints may be submitted to:

CDBG Program Manager
Department of Community Development
Sandy Springs City Hall
1 Galambos Way
Sandy Springs, GA 30328

Those wishing to submit concerns or complaints electronically may also email those to cdbgprogram@sandyspringsga.org.

Use of Citizen Participation Plan

Sandy Springs is committed to ensuring that it will follow this Citizen Participation Plan in all aspects of the planning and administration of any current or future applicable federal programs.

Disasters, Emergency Provisions

In the event of a declared disaster or emergency, it may be necessary to expedite the adoption of the Annual Action Plan and/or substantial amendments to the Consolidated Plan. These 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. Therefore, the City may utilize CDBG funds to meet these needs with a 5 day public comment period instead of a 30 day public comment period (which is otherwise required).

With respect to a declared disaster or emergency event, the City may elect to use CDBG funds to address needs not provided for by the FEMA and the Small Business Administration 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 or any other CDBG eligible use. HUD may provide new guidance on eligible uses in which the City will comply with and may utilize as well.

In the event of declared disaster or emergency event, such as a pandemic or any other event that leads to the closure of City Hall, the City has the option to use the following provisions:

- When soliciting input for the City's Consolidated Plan, Annual Action Plan, substantial amendments or Annual Performance Report, AFH or substantial AFH revision a short summary description of each will be provided in each public notice for informational purposes and will be posted online on the City's website www.sandyspringsga.gov, Hard copies will not be required to be posted.
- Public comment will be received solely via the email cdbgprogram@sandyspringsga.gov
- Public hearings may be held virtually, to be consistent with national/local health authorities recommending social distancing and limiting public gatherings for public health reasons, and there will be a process in place detailing how citizens can virtually participate in the public hearings.
- The public comment period will be shortened to 5 days

Citizen Comments – Citizen Participation Plan adopted June 20, 2006

The City of Sandy Springs received comments from two residents of the city concerning the Citizen Participation Plan and the CDBG Program during the development of its first Plan in June of 2006.

Ms. Chanel Winston submitted a request indicating her interest in participating in any task force or committee that may arise during the implementation of the CDBG Program. Ms. Winston also expressed an interest in the City's community development activities, transit improvements, efforts to provide more affordable housing in the City of Sandy Springs and the program's budget.

Ms. Peggy Wilson, a resident of the Allen Road elderly mid-rise community managed by the Housing Authority of Fulton County, expressed concerns pertaining to the CDBG Program. She felt it was important to the program's

success that the City ensure proper program oversight to avoid any misuse of these federal resources. She also indicated that she was pleased with the City's incorporation and the quality of life in Sandy Springs, and that she had chosen to live in the Allen Road facility to be nearer her family. She did, however, express some concerns related to the potential development of future public housing in the area.

These comments represent the public input received related to the City's publication of its initial Citizen Participation Plan during the 15-day advertised comment period from May 22, 2006 to June 5, 2006.

Citizen Comments – Citizen Participation Plan amended June 16, 2009

No public comments received.

Citizen Comments – Citizen Participation Plan amended June 6, 2017

No public comments received.

Citizen Comments – Citizen Participation Plan amended May 7, 2019

No public comments received.

Citizen Comments—Citizen Participation Plan amended May 7, 2020

Attachment A - Summary of 24 CFR Part 91.105

No.	Document	Requirement	Public Notice	Comment Period	Publication Methods	Notice Summary
1.	Citizen Participation Plan	Reasonable opportunity	Yes Comment notice	15 calendar days minimum	SS Neighbor, Mundo Hispanico city website, local notices, etc.	Plan intent, availability, address for submission of comments; contact information.
2.	Consolidated Plan/ Annual Action Plan/ AFH	2 annual public hearings Public hearing #1: Draft Plan Development (prior to public comment period)	Yes 15-day notice minimum prior to hearing	30 calendar days minimum	SS Neighbor, Mundo Hispanico city website, local notices, etc.	Contents and purpose of plan; locations where full plan is available for review; date, time and location for public hearing; address for submission of comments on plan; contact information.
3.	Substantial amendment to Citizen Participation Plan, Consolidated Plan, Annual Action Plan, AFH or application for new funding resources, such as Section 108 Loan Program, or participation in a new program	Reasonable opportunity	Yes 15-day notice minimum prior to public hearing	30 calendar days minimum	SS Neighbor, Mundo Hispanico city website, local notices, etc.	Description of proposed amendment including budget, location and beneficiaries; new program participation or application for funding; date, time and location of public hearing; address for submission of comments; contact information.
4.	Annual Performance Report	Reasonable opportunity Public hearing #2: During Annual Report public comment period	Yes 15-day notice minimum prior to hearing	15 calendar days minimum	SS Neighbor, Mundo Hispanico city website, local notices, etc.	Announcement and location of report availability; address for submission of comments; contact information.
5.	Public comment response	15 calendar days	No	N/A	N/A	Timely and substantive response to all written comments.

