

**CITY OF SOUTH SAN FRANCISCO
CONSOLIDATED PLAN 2018 – 2023
2019 – 2020 ANNUAL ACTION PLAN
2020-2021 ANNUAL ACTION PLAN
CITIZEN PARTICIPATION PLAN**

SUBSTANTIAL AMENDMENT

I. Introduction

Each year the US Department of Housing and Urban Development (HUD) provides funding for housing and community development programs to the City of South San Francisco, specifically Community Development Block Grant (CDBG) funds. To receive these funds, the City must complete a report every five years called the Consolidated Plan.

The purpose of the Consolidated Plan is to identify South San Francisco's housing and community development needs, priorities, goals, and strategies and to stipulate how funds will be allocated to housing and community development activities over the period of the Consolidated Plan. The Annual Action plan provides the yearly goals and framework for achieving the stated plans in the Consolidated Plan.

As stated in the City's Citizen Participation plan, the City shall amend the Consolidated Plan and Annual Action Plan anytime there is a change of CDBG funding of more than \$50,000 from one eligible activity to another or to fund a new activity not previously identified in the Annual Action Plan or Consolidated Plan. The public will be notified whenever there is a substantial amendment. A substantial amendment is classified as follows:

- To make a change in its allocation priorities or a change in the method of distribution of funds;
- To change the purpose, scope, location, or beneficiaries of an activity.

To implement these programs and to comply with HUD requirements for distribution and use of funds, the City must make substantial amendments to existing plans:

- 2018-2023 Consolidated Plan;
- 2019 Annual Action Plan; and
- 2020 Annual Action Plan

As identified in the City's Citizen Participation Plan, changes in priorities or goals occur, an amendment is required.

In September 2020, the City received an additional allocation of \$575,525 of CDBG funds to be used to prevent, prepare for, and respond to the coronavirus (COVID-19). This

allocation was authorized by the Coronavirus Aid, Relief, and Economic Security Act (CARES Act), Public Law 116-136 to respond to the growing effects of this historic public health crisis.

The CARES Act made available \$5 billion in Community Development Block Grant Coronavirus (CDBG-CV) funds. Of this amount, HUD immediately allocated \$2 billion on March 27, 2020 based on the fiscal year 2020 CDBG formula; this constituted the first round of CDBG-CV funds. Next, \$1 billion was required by the Act to be allocated to States and insular areas within 45 days of enactment of the Act; HUD accomplished this on May 11, 2020, and this constituted the second round of CDBG-CV funds.

Finally, the remaining \$2 billion in CDBG-CV funds was required by the Act to be allocated to states and local governments at the discretion of the Secretary on a rolling basis; HUD accomplished this on September 11, 2020, and this constituted the third round of CDBG-CV funds.

Waivers and alternative requirements can be granted when necessary to expedite and facilitate the use of funds to prevent, prepare for, and respond to COVID-19. Moreover, the public comment period is reduced to not less than 5 days, virtual public hearings may be used when necessary for public health reasons, the public service cap is suspended during the emergency, and state and local government may reimburse costs of eligible activities incurred for pandemic response regardless of the date. The City has implemented the 5-day waiver for the substantial amendments to the plans.

In addition, the City is amending the Citizen Participation Plan to comply with HUD requirements for public comment for 30 days.

II. Amendment to the 2018 – 2023 Consolidated Plan

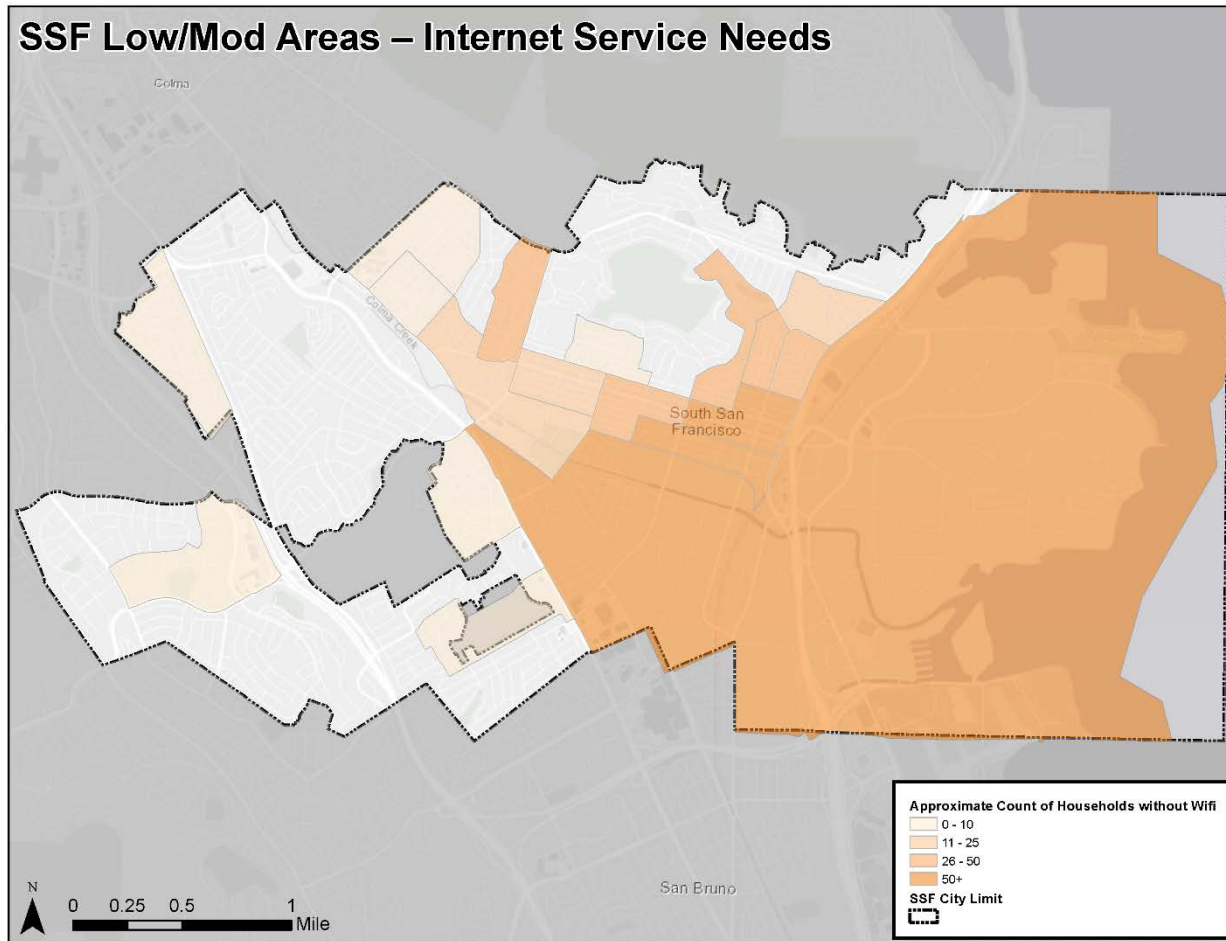
The Consolidated Plan is currently being amended to include language for sections that was not previously addressed in the 2018-2023 Consolidated Plan. The specific sections addressed are Market Analysis (MA) 60 Broadband Needs and MA 65 Hazard Mitigation. The following text would be included in the sections.

MA-60 Broadband Needs

Describe the need for broadband wiring and connections for households, including low- and moderate-income households and neighborhoods.

The City is located in the heart of Silicon Valley, but studies provided by the County of San Mateo County show a significant digital divide between those with high speed Internet access and those with slow speed or no access. The attached figure outlines the areas of the City that are defined by the Department of Housing and Urban Development (“HUD”) as Low/Moderate (“Low/Mod”) Census Tracts. Low/Mod Census Tracts mean that 51% or more of the households in that Census tract earn less than 80% of the

County's Area Median Income ("AMI"). Qualified Census Tracts ("QCT") mean that 51% or more of the households in that Census tract earn less than 50% of the County's AMI. The figure also indicates areas where students are lacking in WIFI access. The COVID-19 pandemic has also exacerbated this problem.



Source: San Mateo County, <https://www.smcgov.org/smc-public-wifi-project>, January 2021.

Describe the need for increased competition by having more than one broadband Internet service provider serve the jurisdiction.

According to Federal Communications Commission (FCC) datasets from internet providers, 72.2 percent of consumers in the City (about 41,000 people) only have access to one or none wired internet providers available at their address. Therefore, increased internet and broadband competition would give consumers in the City more options. Bringing more providers to the jurisdiction would give residents more choices for services and cost.

The City's Economic Development and Housing, IT and Library Departments have been consulted to understand the City's digital needs. Generally, people require access to a device (ideally a computer) and access to internet service. In terms of providing devices, City staff investigated programs for providing laptops. For Wi-Fi, staff considered two approaches:

1. Long-term access to free public Wi-Fi and
2. Immediate Access to Wi-Fi via hotspots or utility assistance.

One option that the IT Department have been exploring is to install public Wi-Fi to the 12,000 people living in a half square mile, in the City's lowest income areas. The City is currently exploring several avenues to bridge the digital divide in the community.

In 2020, The City of South San Francisco public Wi-Fi initiative focused more on bridging the digital divide due to the coronavirus. In the beginning of the year, the City expanded Wi-Fi to Westborough Park covering the lower part including the parking lots, giving residents an option for remote learning. In December the City partnered with San Mateo County to expand the San Mateo County public Wi-Fi in South San Francisco. The County surveyed the school districts to identify areas where students are without internet service. Based on the data received from SSFUSD, the City worked with the County to expand the outdoor public Wi-Fi network to Magnolia Senior Center, Orange park, City Hall and Miller park garage areas. The City will continue to expand public Wi-Fi as funding is available.

MA- 65 Hazard Mitigation

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

The City of South San Francisco follows the National Preparedness System, which outlines an organized process for everyone in the [whole community](#) to move forward with their preparedness activities and achieve the [National Preparedness Goal](#).

- **Identifying and Assessing Risk** First, collect historical and recent data on existing, potential and perceived threats and hazards. The results of these risk assessments form the basis for the remaining steps.
- **Estimating Capability Requirements** Next, determine the specific capabilities and activities to best address those risks. Some capabilities may already exist, and some may need to be built or improved.
- **Building and Sustaining Capabilities** This involves figuring out the best way to use limited resources to build capabilities. The city can then use the risk assessment to prioritize resources to address the highest probability or highest consequence threats.
- **Planning to Deliver Capabilities** Because preparedness efforts involve and affect the whole community, it's important that the city coordinate plans with other organizations.

- **Validating Capabilities** Participating in exercises, simulations or other activities helps the city identify gaps in our plans and capabilities.
- **Reviewing and Updating** It is important to regularly review and update all capabilities, resources and plans. As risks and resources evolve—and so should our preparedness programs.

Based on this process and listed in the city current Local Hazard Mitigation Plan (LHMP) natural hazards were ranked as follows for the level of risk they pose to the city.

1. Earthquake
2. Severe Weather
3. Landslide
4. Flood
5. Tsunami
6. Wildfire
7. Drought
8. Dam Failure

CERT Program:

The City of South San Community Emergency Response Team (CERT) is sponsored by the South San Francisco Fire Department and managed by the Emergency Services Manager. The program educates volunteers about disaster preparedness for the hazards that impact their area and trains them in basic disaster response skills, such as fire safety, light search and rescue, team organization, CPR and first aid, HAM communications, incident command system, basic hazmat responder training, and emergency center operations. The CERT program has a robust continual training program and plays an active role in city events. The program offers a once a year CERT academy for residents of South San Francisco and is a consistent, nationwide approach to volunteer training and organization that professional responders can rely on during disaster situations, allowing them to focus on more complex tasks.

Staff Training and Exercises:

The City of South San Francisco has pursued a coordinated emergency preparedness strategy that combines enhanced planning, new equipment purchases, innovative training, and realistic exercises to strengthen the City's emergency preparedness and response capabilities. Training and exercises play a crucial role in this strategy, providing the City with a means of attaining, validating, and improving new capabilities.

The City of South San Francisco training and exercise plan is administered by the South San Francisco Fire Department's Emergency Services Manager under the guidance

from the Fire Chief. The plan helps prepare the City of South San Francisco to optimally address both the natural and technical hazards that it faces.

All City Departments

- Support and provide employees to staff the EOC as requested
- Release employees to attend EOC training and exercises

SSFFD Emergency Services Manager

- Maintain a log of EOC staff and their training
- Determine EOC staff training requirements
- Schedule and provide the needed training for EOC staff and CERT
- Schedule and conduct EOC exercises (3 times a year)
- Provides information when outside additional training is available

SSFFD utilizes the Core Capabilities & Mission Areas along with the Homeland Security Exercise and Evaluation Program (HSEEP) as the guide for and exercise planning. HSEEP constitutes a national standard for all exercises. The National Exercise Program supports organizations to achieve objective assessments of their capabilities so that strengths and areas for improvement are identified, corrected, and shared as appropriate prior to a real incident.

Fire Disaster Preparedness:

The City of South San Francisco Fire Department engages with the public in fire preparedness for residential and wildland fires through various planned events; Disaster Preparedness Day, Farmers Market, Public Service Announcements, Weed Abatement Program, Fire Prevention Month, Smoke Detector Program and the Jr. Fire Academy. The Fire Department is also proactive via social media, the department website, annual commercial fire inspections and everyday interaction with the public.

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

Typically, LMI households are present in floodplains more often than other types of households. Therefore, they become more vulnerable to extreme flooding events, as well as subjected to higher flood insurance costs.

Operations Maintenance: Public Works maintains, and repairs storm drain system as needed. The system includes storm drain lines, pump stations, and catch basins.

Capital Improvement Program (CIP): Public Works performs larger repair and improvements to the drainage system through implementation of the CIP. We also incorporate sea level rise improvements as appropriate into our CIP projects. We are

working with Army Corps of Engineers for flood and sea level rise improvements at the WQCP and Colma Creek areas.

Flood Control District: Public Works Department works with the Flood and Sea Level Rise Resiliency District formerly known as Flood Control District for the overall maintenance and repairs of the Colma Creek channel.

Flood zones: By ordinance, Public Works acts as the floodplain administrator for review of development within special flood hazard zones as identified by FEMA.

III. Proposed Amendment to the 2019 – 2020 Action Plan

The substantial amendment to the 2019 Action Plan is required to allocate CDBG-CV funds of \$575,525. The table below would amend the current 2019 funding and allocation as listed in the table below.

A description of the new activities being added to the fiscal year are as follows:

As previously mentioned, the CDBG-CV funds must be used to prevent, prepare for, and respond to the COVID 19. The funds are restricted and subject to the CDBG regulations, with a few exceptions. The activities that would be funded through CDBG-CV3 funds include:

- Bridging the digital divide (laptop and wireless service);
- Public services for seniors;
- Meeting new health needs (medical supplies); and
- City public improvement projects that respond to social distancing needs (public improvements).

Public Comments

The City will incorporate any comments received during the public comment period.

Table 1: CDBG 2019-2020 Annual Action Plan Proposed Revisions

SPENDING LIMITS FOR CDBG FUNDS		
PUBLIC SERVICES	2019-2020	Proposed
Public Services	90,600	90,600
Bridging Digital Divide (CDBG-CV3)		\$340,000
COVID Related Public Services		\$65,000
Total Public Service Limit	90,600	\$495,600
CDBG ADMINISTRATION		
CDBG Administration	109,376	109,376
Total Administration Limit for CARES Act (CDBG-CV1)	58,071	58,071
Total Administration Limit for CARES Act (CDBG-CV3)		114,000
Total CDBG Administration		281,447
NON-CAPPED CDBG FUNDS		
CAPITAL IMPROVEMENTS/PUBLIC FACILITIES	2019-2020	Proposed
Capital Improvements Projects	306,000	306,000
Medical Supplies		1,500
Public Facilities Upgrades in response to COVID		65,000
Total	306,000	372,500
MINOR HOME REPAIR PROGRAMS	138,250	138,250
CITY SPONSORED ACTIVITIES		
Housing Rehabilitation Program	-	-
Debris Box Vouchers	2,000	2,000
Emergency Home Repairs Vouchers	-	-
Total City Sponsored Activities	2,000	2,000
ECONOMIC DEVELOPMENT ASSISTANCE PROGRAM		
Entitlement/Program Income/Uncommitted Funds	200,000	200,000
CARES-ACT	200,000	200,000
Totals Economic Development Assistance	400,000	400,000

IV. Proposed Amendment to the 2020 – 2021 Annual Action Plan

The City of South San Francisco Proposes to amend the 2020-2021 budget as indicated in Table 2. In compliance with HUD and the City’s CPP, the City shall amend the Consolidated Plan and Annual Action Plan anytime there is a change of CDBG funding of more than \$50,000 from one eligible activity to another or to fund a new activity not previously identified in the Annual Action Plan or Consolidated Plan.

The substantial amendment to the 2020-2021 Annual Action Plan would provide \$140,000 of program income and rollover entitlement funds from previous years to capital improvement projects aimed at bridging the digital divide in the City.

Table 2 – Proposed 2020-2021 Annual Action Plan Proposed Substantial Amendment

CAPITAL IMPROVEMENTS/PUBLIC FACILITIES		
	2019-2020	Proposed
Capital Improvements Projects	0	
Capital Improvements Projects (Bridging Digital Divide)		\$140,000

Public Comments

The City will incorporate any comments received during the public comment period.

V. Proposed Amendment to the Citizen Participation Plan

The last update to the Citizen Participation Plan was in May 2020. Based on review by HUD, the city is required to change text for review of the Citizen Participation Plan from 15 days to the required 30 days. The text will be changed with the following areas of the Citizen Participation Plan:

Adequate Public Notice

Adequate advance notice is "timely"; it is given with enough lead-time for the public to take informed action. The amount of lead-time can vary, depending on the event.

TIMING	ANNUAL PLAN/ CONSOLIDATED PLAN	CAPER	SUBSTANTIAL AMENDMENTS	CITIZEN PARTICIPATION	Assessment of Fair Housing (AFH) Report
Public Comment Period/ Notice of Availability	30 days	15 days	30 days	30 days	30 days

II. Criteria for Amendment

To revise the CPP, a draft version of the revised CPP will be prepared by City staff and made available for the **30-day** public review period.