



CITY OF SEASIDE

COMMUNITY DEVELOPMENT BLOCK GRANT (CDBG) PROGRAM

CITIZEN PARTICIPATION PLAN

Adopted: December 2, 2021

Prepared by:

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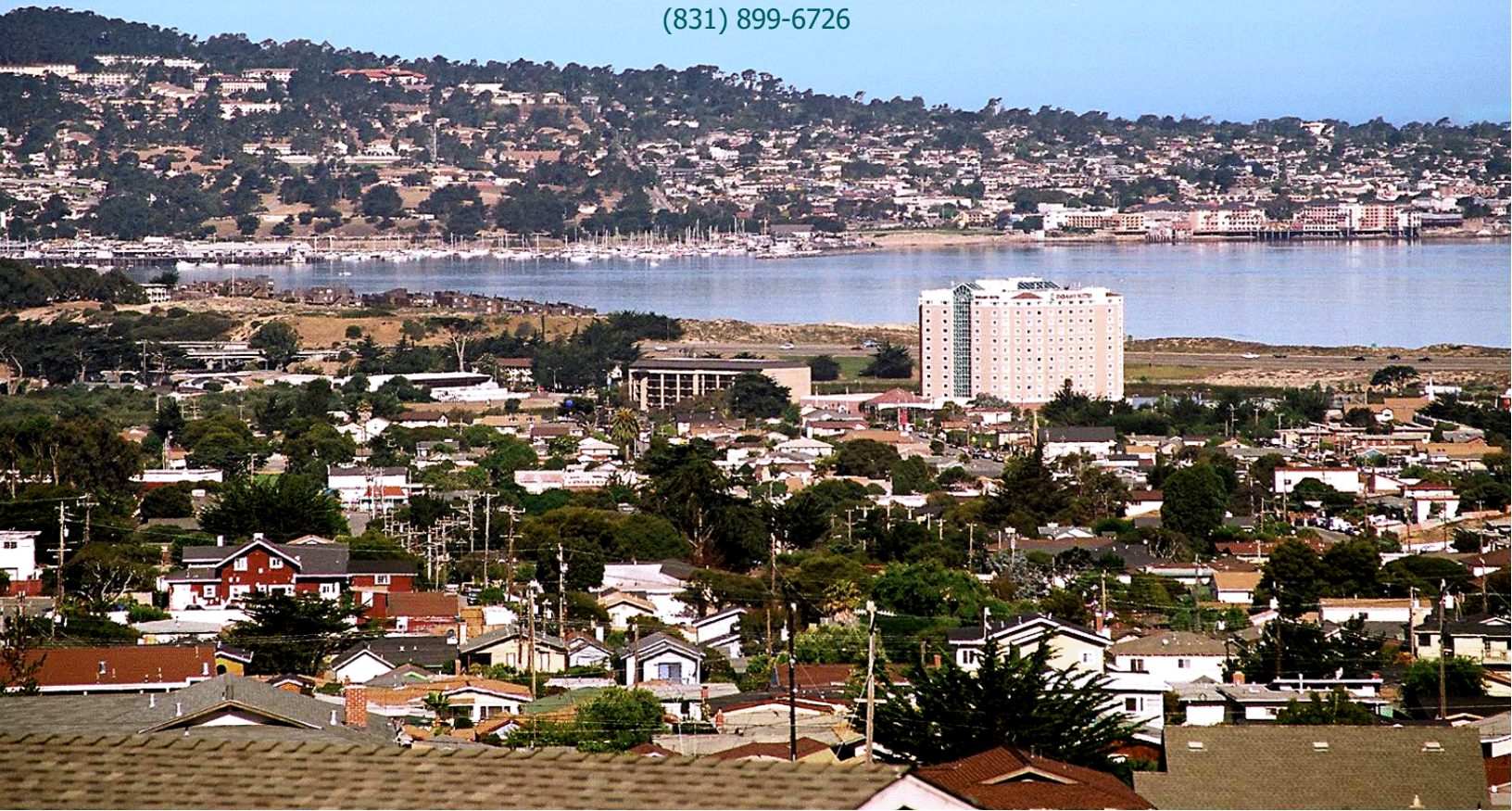


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A. Introduction

The City of Seaside (City) is a recipient of federal entitlement grant funding from the U.S. Department of Housing and Urban Development (HUD) for the Community Development Block Grants (CDBG). As a recipient of these funds, the City is required to prepare a Consolidated Plan to assess the City's affordable housing and community development needs, and develop data-driven funding strategies and program goals. The Consolidated Plan is carried out through Annual Action Plans, which provide a summary of the specific activities and resources that will be used each year to address the needs and goals identified by the Consolidated Plan. Accomplishments and progress toward meeting the City's goals are reported in the Consolidated Annual Performance and Evaluation Report (CAPER). As part of the Consolidated Plan, the City is also required to conduct an Analysis of Impediments to Fair Housing to review laws, regulations, conditions and other possible obstacles, both public and private, which could affect an individual's access to housing in Seaside.

Additionally, the City must adopt a Citizen Participation Plan (CPP) that sets forth the City's policies and procedures for citizen participation in the development of the Consolidated Plan and the other aforementioned HUD-mandated documents. The citizen participation process outlined in this plan was developed in accordance with Federal regulations 24 CFR 91.105, and requires outreach, public hearings, community meetings, and opportunities for comment. The plan provides for citizen input and emphasizes participation by low- and moderate-income residents, particularly residents of predominantly low- and moderate-income neighborhoods, regional stakeholders and Continuums of Care, and residents of areas in which the City proposes to use CDBG funds. It also outlines the practicable procedures to handle complaints from residents regarding its Consolidated Plan and other HUD-mandated documents.

Ultimate responsibility and authority for final decisions regarding the Consolidated Plan and related documents resides with the Seaside City Council. Nothing herein shall be construed to restrict the responsibility or authority of the City for the development and execution of its community development programs and execution of its Consolidated Plan.

This CPP supersedes and replaces all previous plans adopted or amended for the CDBG Program. The CPP shall be available to the public on the City website, and, upon request, will be made in a format accessible to persons with disabilities. The City will review its CPP annually in conjunction with the development of the City's Annual Action Plan. If it is determined that the CPP needs to be updated or revised, the City will provide citizens with a reasonable opportunity to comment on proposed changes to the CPP in accordance with the Public Review requirements for the amendment of documents described further in this document.

B. Definitions

Annual Action Plan (AAP): The AAP outlines the activities that will be undertaken during the program year to meet the goals stated in the City's 5-year Consolidated Plan (defined below).

Affirmatively Furthering Fair Housing (AFFH): AFFH is a legal requirement for local governments that receive federal grants to further the purposes of the Fair Housing Act by undertaking actions that combat discrimination, overcome patterns of segregation, and foster inclusive communities free from barriers that restrict access to housing.

Analysis of Impediments to Fair Housing Choice (AI): The AI is a comprehensive review of a community's laws and administrative policies and practices (both public and private), and an analysis of how they affect the location, availability, and accessibility of housing choice for various protected classes (e.g. race, color, religion, sex, disability, familial status, or national origin). The AI is required to be updated every five years in conjunction with the Consolidated Plan.

Citizen Participation Plan (CPP): The Citizen Participation Plan (CPP) outlines the procedures the City will undertake to ensure public involvement during the development of the City's Consolidated Plan and Annual Performance Report, and Analysis of Impediments to Fair Housing Choice.

Community Development Block Grant (CDBG): The CDBG program provides formula grants to create viable urban communities by providing decent housing, suitable living environments and expanded economic opportunities, principally for low and moderate-income persons.

Consolidated Annual Performance Evaluation Report (CAPER): The CAPER provides the federal government, Congress and the public with necessary information to assess the City's progress in meeting its CDBG program goals.

Department of Housing and Urban Development (HUD): HUD is the federal agency that oversees the CDBG program, among various other programs. HUD's mission is to create strong, sustainable, inclusive communities and quality affordable homes for all.

Displacement: The relocation of individuals from their residences resulting from housing development and rehabilitation activities paid for by federal funds.

Eligible Activity: Activities that may be supported in whole or in part with CDBG funds as defined in the Code of Federal Regulations Title 24.

Entitlement Community: A metropolitan city or urban county entitled to receive a formula allocation of CDBG funds.

Five-Year Consolidated Plan (ConPlan): The ConPlan identifies the City's housing and community development needs and details the City's 5-year strategy and goals for addressing those needs with HUD-allocated funds.

Public Services Grant: General Funds made available by the Seaside City Council to grant to local non-profit organizations that provide direct social and human services to low- and moderate-income City residents.

Low-and moderate-income: Households with income that do not exceed 80 percent of the Area Median Income (AMI) as defined by HUD.

C. Roles and Responsibilities

City Council: The Mayor and Councilmembers comprise the nonpartisan City Council, and are elected at large. Under the City Charter, City Council's duties include: approval of the City budget and financial oversight of the City. The City Council has the power to adopt ordinances and resolutions, make appointments to advisory boards, establish policy and approve programs, act on recommendations of City staff, appropriate funds, approve contracts, and respond to concerns and needs of residents.

The City Council reviews and adopts the City's ConPlan, AI and AAP activities, and authorizes City staff to administer the programs.

City Manager: The City Manager reports directly to the City Council and provides for the management of all affairs of City government and services, as well as oversight and direction of all City departments. The City Manager is the City's representative authorized to sign the necessary documents required by HUD.

Community Development Department (CDD) staff: The CDD staff are responsible for the day-to-day coordination and administration of the CDBG. The administrative policies for the City's CDBG program are outlined in two policy documents entitled CDBG Policies and Procedures and Davis-Bacon Act Manual. Both documents can be found at www.ci.seaside.ca.us/CDBG.

Community Development Advisory Committee (CDAC): CDAC members are appointed by the Seaside City Council and serve in an advisory capacity to the City Council, City Manager, and CDD staff on policy issues related to HUD 's Consolidated Plan and the allocation of CDBG funds. The CDAC's charge includes advocating for low- and moderate-income Seaside residents for housing and community development needs and assuring resident input in determining the use of funds. The CDAC coordinates its efforts with neighborhood-based organizations to increase participation by low- and moderate-income households.

CDAC meetings are called as needed. CDAC meetings are noticed in accordance with the Brown Act and are open to the public. Additional information regarding CDAC can be found in the CDAC Membership Guide, which is available at www.ci.seaside.ca.us/CDBG.

D. Encouragement of Citizen Participation

The City of Seaside provides for and encourages citizens to participate in the development of the CPP, Consolidated Plan, AFH or AI, Action Plan, and CAPER. The City encourages participation by low- and moderate-income persons, particularly those living in slum and blighted areas (if any such areas are formally designated) and in areas where CDBG funds are proposed to be used, and by residents of predominantly low- and moderate-income neighborhoods. The City will also take appropriate actions to encourage the participation of all its citizens, including minorities and non-English speaking persons, as well as persons with disabilities.

The City will make a concerted effort to notify and encourage the participation of

- Citizens;
- Local and regional institutions;
- Continuum of Care organization addressing homelessness,
- Public and private organizations including businesses, developers, nonprofit organizations, philanthropic organizations, and community-based and faith-based organizations;
- Broadband internet service providers
- Organizations engaged in narrowing the digital divide;
- Agencies whose primary responsibilities include the management of flood prone areas;
- Public land or water resources agencies;
- Emergency management agencies;
- State and local health service providers;

- Social service providers;
- Fair housing organizations;
- State and local governments;
- Public housing agencies;
- Affordable housing developers; and
- Other stakeholders in the amendment of the Citizen Participation Plan or the development of the AI or AFH, Consolidated Plan, Annual Action Plans.

Participating will be notified through mailings (including electronic mailings), online postings and public notices in the newspaper.

The City may also explore alternative public involvement techniques and quantitative ways to measure efforts that encourage citizen participation in a shared vision for change in communities and neighborhoods, and the review of program performance as directed by the CDAC. All communication, public comments, and complaints concerning the Citizen Participation Plan and the Consolidated Plan Documents should be directed to:

CDBG Administrator
 Community Development Department
 440 Harcourt Ave, Seaside, CA 93955
 Phone: (831) 648-6726
 Email: CDBG@ci.seaside.ca.us

E. Citizen Participation Plan (CPP)

The City recognizes the importance of public participation in both defining and understanding current housing and community development needs and prioritizing resources to address those needs. The City's CPP is designed to encourage Seaside residents' equal access and involvement each year. The following describes the process and procedures related to the development of the CPP.

E.1 Plan Development

The City's CPP development procedures are outlined below.

a) *Plan Considerations*

The City is required to adopt a CPP that sets forth the jurisdiction's policies and procedures for citizen participation. The City must provide citizens with a reasonable opportunity to comment on the original CPP and any substantial amendments to the citizen participation plan, and must make the CPP publicly available. The CPP must be made available in a format accessible to persons with disabilities, upon request.

The CPP shall describe the jurisdiction's procedures for assessing its language needs and identify any need for translation of notices and other vital documents. At a minimum, the CPP shall require that the jurisdiction take reasonable steps to provide language assistance to ensure meaningful access by non-English-speaking residents of the community.

The City should explore alternative public involvement techniques and quantitative ways to measure efforts that encourage citizen participation (e.g., use of focus groups and online engagement tools).

b) *Plan Review and Comment*

The draft CPP shall be made available for public review for a 30-day period. The CPP shall be provided in a format accessible to persons with disabilities upon request. This may include, but is not limited to providing oral, Braille, electronic or large print versions of the plan to those visually impaired, and delivering copies to those who are homebound. The CPP will encourage comment and participation by minority and non-English speakers. Publication of the plan will be advertised in non-English languages to the extent practical and translation services will be available upon request.

Written comments will be accepted by the Community Development Department CDBG Administrator or designee during the public review period. A summary of all written comments and those received during the public hearing as well as the City's responses will be attached to the CPP prior to submission to HUD.

c) *Public Hearing*

The City Council shall conduct a public hearing to accept oral public comments on the draft CPP. The City Council may approve or reject the CPP.

d) *Submittal to HUD*

The CPP shall be approved as a stand-alone document. The City shall then submit to HUD: the approved document, a summary of all comments received during the review period and during the public hearing, responses from City, and proof of compliance with the minimum 30-day public review and comment period requirement. A summary of any comments or views not accepted and the reasons therefore shall be supplied to HUD.

E.2 Amendments

The City shall amend the CPP using the following procedures, as needed:

a) *Amendment Considerations*

The City shall amend the CPP, as necessary, to ensure adequate engagement and involvement of the public in making decisions related to the programs and documents governed by Federal Regulation 24 CFR Part 91. Formal amendment of the CPP may be required should a provision of the CPP be found by the City to conflict with HUD regulations.

b) *Public Review and Comment*

Amendments to the CPP shall be made available for public review for a 30-day period. A public hearing shall be conducted by the City Council at a regularly scheduled meeting so that citizens may express their views. Written comments will be accepted by the Community Development Department CDBG Administrator or designee during the public review period. A summary of all written comments and those received during the public hearing as well as the City's responses will be attached to the amended CPP prior to submission to HUD.

Minor edits to the CPP, such as updating contact information or technical details about schedules and publications, will not constitute a "Substantial Amendment", and therefore, will not be released for public review and comment. Copies will be made available following the process described in Section J of this document.

c) *Public Hearing*

The City Council shall conduct a public hearing to review and accept public comments on the draft amendment to the CPP.

d) *Submittal to HUD*

A copy of the Amended CPP, including a summary of all comments received during the review period and during the public hearing, responses from City, and proof of compliance with the minimum 30-day public review and comment period requirement shall be submitted to HUD for their records. A summary of any comments or views not accepted and the reasons therefore shall be supplied to HUD as applicable.

F. Five-Year Consolidated Plan

The following paragraphs describe the policies and procedures for the development of the Five-Year Consolidated Plan. To comply with Federal Regulation 24 CFR Part 91.105(b), the information supplied in the draft Consolidated Plan for public review will include:

- Amount of assistance the City expects to receive (grant funds and program income)
- Range of activities that may be undertaken
- Estimated amount of funding that will benefit low- and moderate-income persons

The City shall also provide an assessment of community development and housing needs and identify short- and long-term community development objectives directed toward the provision of decent housing and the expansion of economic opportunities primarily for persons of low- and moderate-income.

The City will make this information available in the Consolidated Plan published for comment and review.

F.1 Plan Development

The City encourages the participation of residents and stakeholders in the development of the Consolidated Plan. The City shall follow the following procedure to prepare and adopt the Consolidated Plan:

a) *Plan Considerations*

When preparing the Consolidated Plan, the City must consult with:

- The Monterey County Continuum of Care (COC);
- Public and private agencies that address housing, health, social services, victim services, employment, or education needs of low-income individuals and families; homeless individuals and families (including homeless veterans); youth; and/or other persons with special needs;
- Publicly funded institutions and systems of care that may discharge persons into homelessness (such as health-care facilities, mental health facilities, foster care and other youth facilities, and corrections programs and institutions); and
- Business and civic leaders.

When preparing the portion of the Consolidated Plan concerning lead-based paint hazards, the City shall consult with state or local health and child welfare agencies and examine existing data related to lead-based paint hazards and poisonings, including health department data on the addresses of housing units in which children have been identified as lead poisoned.

When preparing the description of priority non-housing community development needs, the City must notify adjacent units of general local government, to the extent practicable. The non-housing community development plan must be submitted to the state and to the county.

The City will also consult with adjacent units of general local government, including local government agencies with metropolitan-wide planning responsibilities, particularly for problems and solutions that go beyond the City's jurisdiction.

The City will consult with the Monterey County Housing Authority, the local public housing agency (PHA) concerning consideration of public housing needs and planned programs and activities.

If the City becomes eligible to receive Emergency Solutions Grants (ESG), the City will consult with the Continuum of Care in determining how to allocate its ESG grant for eligible activities; in developing the performance standards for, and evaluating the outcomes of, projects and activities assisted by ESG funds; and in developing funding, policies, and procedures for the operation and administration of the Homeless Management Information System (HMIS).

A variety of mechanisms may be utilized to solicit input from these persons/service providers/agencies. These include telephone or personal interviews, focus groups, surveys, and consultation and community workshops.

b) Plan Review and Comment

The complete, draft Consolidated Plan shall be made available for public review for a 30-day period. The Consolidated Plan shall be provided in a format accessible to persons with disabilities upon request. Such formats may include, but are not limited to, providing oral, Braille, electronic or large print versions of the plan to those visually impaired and delivering copies to those who are homebound.

The plan will encourage comment and participation by minority and non-English speakers. Publication of the plan will be advertised in non-English languages as needed and translation services will be available upon request.

The plan will encourage comment and participation by low- and moderate-income residents, especially those living in low- and moderate-income neighborhoods, in areas where CDBG funds are proposed to be used and residents of public and assisted housing. Activities to encourage participation may include, but are not limited to, advertising publication of the Consolidated Plan in target areas, hosting community meetings in target areas, and making copies of the plan available in these neighborhoods. Copies will be made available following the process described in Section J of this document.

Written comments will be accepted by Community Development Department CDBG Administrator or designee during the public review period. A summary all comments received during the review period and during the public hearing as well as the City's responses will be attached to the Consolidated Plan prior to submission to HUD.

c) Public Hearing

The City Council shall conduct a public hearing to accept public comments on the draft Consolidated Plan. Section J describes the process for publishing the notice and conducting public hearings.

d) *Submittal to HUD*

The Consolidated Plan shall be submitted to HUD with a summary of all comments received during the review period and during the public hearing, responses from City, and proof of compliance with the minimum 30-day public review and comment period requirement.. A summary of any comments or views not accepted and the reasons therefore shall be supplied to HUD as applicable. The Consolidated Plan will be submitted to HUD 45 days before the program year pursuant to regulations, unless otherwise directed by HUD.

F.2 Consolidated Plan Amendment

The City shall follow the below procedure to complete substantial and minor amendments to the Consolidated Plan, as needed:

a) *Amendment Considerations*

The City shall substantially amend the Consolidated Plan if a “substantial change” is proposed by City staff or the City Council. For the purpose of the Consolidated Plan, a “substantial change” is defined as:

- The City adds or removes Consolidated Plan - Strategic Plan goals.

The City may make minor changes to the Consolidated Plan, as needed, so long as the changes do not constitute a substantial amendment as described above. Changes to numeric accomplishment goals within an existing strategic plan goal shall not constitute a substantial amendment. Such changes to the Consolidated Plan will not require public review or a public hearing.

b) *Public Review and Comment*

The City encourages residents and stakeholders to participate in the development of substantial amendments. Substantial Amendments to the Consolidated Plan shall be made available for public review for a 30-day period. Written comments will be accepted by the Community Development Department CDBG Administrator or designee during the public review period. A summary of the comments and the City’s responses to the comments will be attached to the Consolidated Plan Substantial Amendment.

The City will encourage participation from all residents, especially low- and moderate-income residents, minorities, non-English speakers and those with disabilities. The City will take efforts to make the plan accessible to all such groups. Copies will be made available following the process described in Section J of this document.

c) *Public Hearing*

The City Council shall conduct a public hearing to accept public comments on the draft amendment to the Consolidated Plan. Section J describes the process for publishing the notice and conducting public hearings.

d) *Submittal to HUD*

A copy of the Amended Consolidated Plan, including , a summary of all comments received during the review period and during the public hearing, responses from City, and proof of compliance with the minimum 30-day public review and comment period requirement shall be

submitted to HUD for their records. A summary of any comments or views not accepted and the reasons therefore shall be supplied to HUD as applicable.

G. Annual Action Plan (AAP)

The following describes the process and procedures related to the development of the AAP.

G.1 Plan Development

The City's procedures for preparing and adopting the AAP include:

a) *Plan Considerations*

In addition to local residents, the City will ensure that public (including City staff) and private agencies that provide the following services will be consulted in the development of the AAP:

- Health Services Providers
- Social Services for: Children, Elderly, Disabled, Homeless, Persons With AIDS
- State and Local Health Agencies
- Adjacent Local Governments
- Economic Development Interests
- Community and faith-based organizations
- Monterey County Housing Authority
- Housing developers

These persons/service providers/agencies will be contacted and brought into the process in the following manner:

- Every two years, the City will send a written Notice of Funding Availability (NOFA) to each cooperating department and nonprofit agency advising them that the planning cycle has begun for CDBG funds, and that the City is accepting project proposals.
- City staff will conduct outreach to special interest groups in Seaside, such as senior citizens and the disabled, and make presentations on the AAP to these groups where necessary.
- The City will conduct an eligibility analysis on all project proposals submitted and review the eligible proposals for service provider grants. The review for funding consideration will be conducted by the CDAC.

b) *Plan Review and Comment*

The draft AAP, incorporating the City's proposed uses of CDBG funds, shall be made available for public review for a 30-day period. The City will encourage participation from all residents, especially low- and moderate-income residents, minorities, and those with disabilities. The City will make the plan accessible to all such groups. Copies will be made available following the process described in Section J of this document.

Written comments will be accepted during public review period by the Community Development Department CDBG Administrator or designee. A summary of the comments and the City's responses to the comments will be attached to the draft Action Plan.

c) *Public Hearing*

The CDAC may hold a public meeting to discuss the eligible project proposals and funding recommendations to the City Council for both public service grant and capital outlay projects.

The City Council shall conduct one (1) public hearing to accept comments on the draft AAP which will be provided for public review for a 30-day period (see above).

The City Council shall approve or reject the AAP. Section J describes the process for publishing notice and conducting public hearings.

d) *Submittal to HUD*

Upon adoption of the AAP pursuant to HUD regulations, the City Council shall direct City staff to submit the Action Plan to HUD. Documents related to the public participation process, including copies of public notices and a summary of all public comments received, shall be attached to Action Plan. The Action Plan will be submitted to HUD at least 45 days before the program year pursuant to regulations, or as otherwise allowed or required by HUD.

G.2 Annual Action Plan Amendment

The City shall follow the following procedure to complete substantial and minor amendments to the AAP, as needed:

a) *Amendment Considerations*

The City shall substantially amend the AAP if a “substantial change” is proposed by City staff or the City Council. For the purpose of the Action Plan, a “substantial change” is defined as:

- Carrying out an activity not previously described in the AAP;
- Canceling an activity previously described in the AAP;
- Increasing or decreasing the amount to be expended on a particular activity from the amount stated in the AAP by more than 20 percent of the CDBG grant allocation for the program year; or
- Substantially changing the purpose, scope, location, or beneficiaries of an activity.

Changes in funding for an existing activity not amounting to more than 20 percent of the CDBG grant allocation for the program year will not be considered as a substantial change to the AAP; no formal amendment to the AAP requiring public review and comment will be warranted. However, City Council approval of the activity funding changes is still required.

b) *Public Review and Comment*

The City encourages citizen participation in the development of substantial amendments. Substantial Amendments to the AAP shall be made available for public review for a 30-day period. Written comments will be accepted during public review period. Comments should be directed to the Community Development Department CDBG Administrator or designee. A summary of the comments and the City’s responses to the comments will be attached to the Action Plan Substantial Amendment.

The City will encourage participation from all residents, especially low- and moderate-income residents, minorities, and those with disabilities. The City will take efforts to make the plan accessible to all such groups. Copies will be made available following the process described in Section J of this document.

c) *Public Hearing*

The City Council shall conduct a public hearing to review and consider the Substantial Amendment to the AAP. The City Council shall accept public comments on the Substantial Amendment to the Action Plan at the public hearing. After public comments are heard and considered by the City Council, the City Council shall approve, approve with modifications, or deny the request for a substantial amendment to the AAP. Section J describes the process for publishing the notice and conducting public hearings.

d) *Submittal to HUD*

A copy of the Substantial Amendment to the AAP along with documentation of the public participation process (i.e. public notices and public comments) shall be submitted to HUD for their records.

H. Consolidated Annual Performance and Evaluation Report (CAPER)

The following describes the process and procedures related to the development of the Consolidated Annual Performance and Evaluation Report (CAPER):

H.1 Plan Development

The City shall follow the following procedure in the drafting and adoption of the CAPER :

a) *Plan Considerations*

Staff will evaluate and report the accomplishments of the previous program year for CDBG, and will summarize expenditures that took place during the previous program year.

b) *Plan Review and Comment*

The City encourages citizen participation in the development of the CAPER. The draft CAPER shall be made available for public review for a 15-day period. Written comments will be accepted during public review period by the Community Development Department CDBG Administrator or designee. A summary of all comments received during the review period and during the public hearing and responses from City will be attached to the draft CAPER. Copies will be made available following the process described in Section J of this document.

c) *Submittal to HUD*

Upon completion of the public review period, City staff shall submit the CAPER to HUD. Documentation of the public participation process, including copies of public notices and a summary of all public comments received, shall be attached to the CAPER. The CAPER shall be submitted to HUD within 90 days following the end of the program year pursuant to regulations.

I. Analysis of Impediments (AI) or Assessment of Fair Housing (AFH)

The Analysis of Impediments to Fair Housing Choice (AI) or Assessment of Fair Housing (AFH) is a five-year plan completed by the City individually or as part of a local consortium of other HUD grantees pursuant to HUD guidance for the evaluation of local housing conditions, economics, policies and

practices and the extent to which these factors impact the range of housing choices and opportunities available to all residents in an environment free from discrimination. The following describes the process and procedures related to the development of the AI or AFH.

I.1 Plan Development

The City shall follow the following procedure in the drafting and adoption of the AI or AFH:

a) *Plan Considerations*

As soon as feasible after the start of the public participation process for the AI or AFH, the City will make the HUD-provided data and any other supplemental information available to residents, public agencies and other interested parties by posting the data on the City's website and referencing this information in public notices.

b) *Plan Review and Comment*

The draft AI or AFH shall be made available for public review for a 30-day period. Written comments will be accepted during public review period by the Community Development Department CDBG Administrator or designee. A summary of the comments and the City's responses to the comments will be attached to the draft AI or AFH. Copies will be made available following the process described in Section J of this document.

c) *Public Hearing*

The City Council shall conduct a public hearing to accept public comments on the draft AI or AFH. The City Council shall approve or reject the AI or AFH. Section J describes the process for publishing the notice and conducting public hearings.

d) *Submittal to HUD*

Upon adoption of an AI, the City shall retain the AI in its records and annually report on the status and disposition of the Fair Housing Plan recommendations.

Upon adoption of an AFH, the City shall submit the AFH to HUD for review and acceptance or rejection. The goals of the AFH shall be incorporated into the Consolidated Plan prior to submission of the Consolidated Plan to HUD.

I.2 AI or AFH Amendment

The City shall follow the following procedure to complete substantial amendments to AI or AFH, as needed.

a) *Amendment Considerations*

The City shall substantially amend the AI if a "substantial change" is proposed by City staff or the City Council. For the purpose of the AI, a "substantial change" is defined as the addition or deletion of Fair Housing Plan recommendations.

The City shall substantially amend the AFH if a "substantial change" is proposed by City staff, the City Council, or as otherwise required by HUD. An AFH that was previously accepted by HUD must be revised and submitted to HUD for review if a material change occurs. A material change is a change in circumstances in the jurisdiction of a program participant 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 et seq.) in the program participant's area that significantly impact the steps a program participant may need to take to affirmatively further fair housing;
- Significant demographic changes;
- New significant contributing factors in the participant's jurisdiction; 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 the 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.

b) Public Review and Comment

The City encourages residents and stakeholders to participate in the development of substantial amendments. Substantial Amendments to the AI or AFH shall be made available for public review for a 30-day period. Written comments will be accepted by the Community Development Department CDBG Administrator or designee during the public review period. A summary of the comments and the City's responses to the comments will be attached to the Consolidated Plan Substantial Amendment.

The City will encourage participation from all residents, especially low- and moderate-income residents, minorities, and those with disabilities. The City will take efforts to make the plan accessible to all such groups. Copies will be made available following the process described in Section J of this document.

c) Public Hearing

The City Council shall conduct a public hearing to accept public comments on the draft amendment to the AI or AFH. The City Council may approve or reject the amendment to the AI or AFH. A revised AFH must be submitted within 12 months of the onset of a material change that triggers a "Substantial Amendment," or at such later date as HUD may specify. Section J describes the process for publishing the notice and conducting public hearings.

J. Public Hearings, Notification and Access

The following policies and procedures outlining the public hearing process and public hearing notification apply to the development and substantial amendment of the Consolidated Plan, CPP, AAP, CAPER, and AI or AFH.

J.1 Public Meetings and Hearings

a) Public Hearing Process

In accordance with the regulations, the minimum annual number of public hearings at which citizens may express their views concerning the Consolidated Plan Documents shall be two (2) public hearings. These public hearings shall occur at two different points during the program

year. Additional public hearings and comment periods will be held in the development of the AFH or AI and the Consolidated Plan for 2025-2029 and in the event of substantial amendments to the CPP, Consolidated Plan, AFH or AI, or AAP become necessary as described later in this document.

The City, at its discretion, may conduct additional outreach, public meetings or public hearings as necessary to foster citizen access and engagement.

b) Public Hearing Notification

Staff will ensure adequate advance notice of all public meetings and hearings. Notices will be printed/posted at least 10 calendar days prior to the meeting date. Adequate noticing will include:

- Printing a public notice in a newspaper(s) of general circulation in the City;
- Display copies of notices on the City’s website; and
- Posting notices at City Hall and at the Seaside Public Library.

Notices will include information on the subject and topic of the meeting including summaries when possible and appropriate to properly inform the public of the meeting. Notices will be published in other non-English languages as needed and will be accessible to those with disabilities. Meeting locations and access is described below.

J.2 Documents for Public Review

Staff will ensure adequate advanced notice of all public review/comment periods. Notices will be printed/posted prior to the commencement of the public review period alerting residents of the documents for review and providing a summary of the contents of the documents to include information on the content and purpose of the document and the list of locations where copies of the entire draft document(s) may be reviewed. The public comment period for each Consolidated Plan document and substantial amendment to each document subject to public review is listed below:

Document	Length of Public Comment Period
Consolidated Plan	30 Days
AAP	30 Days
CAPER	15 Days
AI or AFH	30 Days
CPP	30 Days

The City will ensure that documents are available for disabled and non-English speaking residents upon request. Adequate noticing will include:

- Printing a public notice in a newspaper(s) of general circulation in the City;
- Display copies of notices on the City’s website; and
- Posting notices at City Hall and at the Seaside Public Library.

The City will place an adequate supply of draft copies of each document and substantial amendments to each document subject to public review at the following locations:

City Hall - Community Development Department 440 Harcourt Ave Seaside, California 93955	Seaside Public Library 550 Harcourt Ave Seaside, California 93955
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Materials will also be posted to the City website at: www.ci.seaside.ca.us/CDBG. All printed reports and materials shall be made available in a form accessible to persons with disabilities, upon request.

J.3 Access to Meetings

Unless otherwise noted, Public Hearings requiring City Council action will be conducted at a Seaside City Council Meeting at 5:00 P.M. at the Seaside City Hall Council Chambers (440 Harcourt Ave, Seaside, California 93955). For public hearings not requiring City Council participation, the City will make every reasonable effort to conduct such hearings in the low- and moderate-income target areas and at times accessible and convenient to potential and actual beneficiaries.

Efforts to ensure this may include, but are not limited to, scheduling meetings in target neighborhoods, scheduling meetings during the evening and on weekends and requesting feedback from neighborhood groups and stakeholders for guidance in effective meeting scheduling. Such hearings will be posted and advertised to allow sufficient notice to all interested persons.

Translations may be available at all public hearings if the Community Development Department CDBG Administrator receives such a request at least 48 hours prior to the public hearing.

It is the intention of the City to comply with the Americans with Disabilities Act (ADA) in all respects. If an attendee or participant at a public hearing needs special assistance beyond what is normally provided, the City will attempt to accommodate these people in every reasonable manner. Efforts may include, but are not limited to, accessible seating, video recording for those homebound, sign language services and production of written transcripts. The City’s Community Development Department CDBG Administrator must be notified at least 48 hours prior to the public hearing. The Community Development Department CDBG Administrator may be reached at:

CDBG Administrator
Community Development Department
440 Harcourt Ave
Seaside, CA 93955
Phone: (831) 648-6726
Email: CDBG@ci.seaside.ca.us

J.4 Access to Consolidated Plan Documents and Records

All approved Consolidated Plan Documents, and any approved amendments thereto, will be kept on file by the City at the City Hall Community Development Department (440 Harcourt Ave, Seaside, California 93955), online at: www.ci.seaside.ca.us/CDBG and can be made available to those requesting the plan. The Consolidated Plan Documents shall be provided in a format accessible to persons with disabilities upon request. Such formats may include, but are not limited to, providing oral, Braille, electronic or large print versions of the plan to those visually impaired and delivering copies to those who are homebound. Upon request, the Consolidated Plan Documents or summaries of those documents will be made available in an accessible manner to those with disabilities.

The City will ensure timely and reasonable access to information and records related to the development of the Consolidated Plan Documents, and the use of HUD CPD funds from the preceding five years. Information to be made available will include budget and program performance information, meeting minutes, and comments received by the City during the development of the Consolidated Plan and its supporting documents.

Requests for information and records must be made to the City in writing. Staff will respond to such requests within 15 working days or as soon as possible thereafter.

K. Technical Assistance

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

- Establish an annual project proposal submission and review cycle (Notice of Funds Availability, or "NOFA") that provides information, instructions, forms and advice to interested extremely low-, low- and moderate-income citizens or representative groups so that they can have reasonable access to the funding consideration process.
- Provide self-explanatory project proposal forms and instructions to all persons who request them whether by telephone or by letter. The City's funding application form is designed to be easily understood and short, while still addressing all key items necessary to assess the proposed project. Statistics concerning specific areas of the City are furnished by City staff upon request.
- Answer, in writing, all written questions and answer verbally all verbal inquiries received from citizens or representative groups regarding how to write or submit eligible project proposals.
- Meet with groups or individuals as requested, to assist in identifying specific needs and to assist in preparing project proposal applications.
- Obtain information in the form of completed project proposal forms from citizens or non-profit agencies and assemble a list of proposals available for public review.
- Conduct a project eligibility analysis to determine, at an early stage, the eligibility of each project. In cases where only minor adjustments are needed to make proposals eligible or otherwise practical, City staff will advise the applicants on the options available and desired changes to the proposals.
- Provide bilingual translation on an as needed basis.

To request technical assistance, please contact the Community Development Department CDBG Administrator at:

CDBG Administrator
Community Development Department
440 Harcourt Ave, Seaside, CA 93955
Phone: (831) 648-6726
Email: CDBG@ci.seaside.ca.us

L. Comments and Complaints

L.1 Comments

Citizens or the City government, as well as agencies providing services to the community, are encouraged to state or submit their comments in the development of the Consolidated Plan Documents and any amendments to the Consolidated Plan. Written and verbal comments received at public hearings or during the comment period, will be considered and summarized, and included as an attachment to the City's final Consolidated Plan. Written comments should be addressed to:

CDBG Administrator
Community Development Department
440 Harcourt Ave, Seaside, CA 93955
Phone: (831) 648-6726
Email: CDBG@ci.seaside.ca.us

A written response will be made to all written comments within ten working days, acknowledging the letter and identifying a plan of action, if necessary. Every effort will be made to send a complete response within 15 working days to those who submit written proposals or comments.

Copies of the complete final Consolidated Plan and amendments to it will be available to residents at the following locations:

CDBG Administrator
Community Development Department
440 Harcourt Ave, Seaside, CA 93955
Phone: (831) 648-6726
Email: CDBG@ci.seaside.ca.us

L.2 Complaints

A complaint regarding the Consolidated Planning process and Consolidated Plan amendments must be submitted in writing to the Community Development Department CDBG Administrator. A written response will be made to written complaints within 15 working days, acknowledging the letter and identifying a plan of action, if necessary.

The City will accept written complaints provided they specify:

- The description of the objection, and supporting facts and data; and
- Provide name, address, telephone number, and a date of complaint.

M. Language Access

When a significant number of people speak and read a primary language other than English, translation services at public hearings will be provided in such language if translation services are requested in advance at least 48 hours prior to the public meeting. Requests should be addressed to the Community Development Department CDBG Administrator. The Community Development Department CDBG Administrator may be reached at:

CDBG Administrator
Community Development Department
440 Harcourt Ave, Seaside, CA 93955
Phone: (831) 648-6726
Email: CDBG@ci.seaside.ca.us

N. Appeals

Appeals concerning the Consolidated Plan, statements, or recommendations of the staff should be made to the following persons in the order presented:

- Community Development Director
- City Manager
- City Council
- San Francisco Area Office of HUD (if concerns are not answered)

O. Disaster

It may be necessary to make expedited amendments to the ConPlan and/or Annual AP in the event of a declared disaster or emergency. There are three types of disasters/emergency events identified by HUD that may necessitate an expedited substantial amendment process including:

1. Man-Made-disasters - can include, but are not limited to, chemical spills, mass rioting, power outages, plant explosions, etc.
2. Natural disasters - can include, but are not limited to, earthquakes, tsunamis, wild fires, flooding and public health concerns, such as wide-spread disease including the recent coronavirus disease 2019 (COVID-19).
3. Terrorism events - include, but are not limited to, bomb threats, biochemical attacks, cyberattacks, phishing, and virus distribution, etc.

Such expedited amendments may include funding new activities, and/or reprogramming funds, and/or canceling existing activities to meet the needs resulting from a declared disaster or emergency. Therefore, the City may make substantial amendments to its CDBG and HOME programs with a 5-day public review/comment period instead of the normal 30-day period. Any substantial amendments shall be available for public review electronically at www.ci.seaside.ca.us/CDBG, or will be emailed upon request. Hard copies will not be available if City buildings are closed to the public due to an emergency

P. Displacement Policy

The City intends to avoid, to the greatest extent feasible, the involuntary displacement of any persons, property or businesses as a result of CDBG activities. All efforts to minimize involuntary displacement will be carried out by designing activities in such a way that displacement is avoided, except in extraordinary circumstances where no feasible alternatives to displacement are available if the City's community development objectives are to be met. Should involuntary displacement become necessary under such circumstances, relocation will be administered in accordance with (a) the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended (URA) and 24 CFR 570.606(b); and (b)

the requirements of 24 CFR 570.606(c) governing the Residential Antidisplacement and Relocation Assistance Plan under Section 104(d) of the HUD Act. The policies and requirements of these laws are described in HUD handbook 1378.