

**Community Development
Block Grant**

Citizen Participation Plan



City of Pittsburg
65 Civic Avenue
Pittsburg, CA 94565
Duns Number: 1979275128

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CITY OF PITTSBURG
Community Development Block Grant Program

Citizen Participation Plan

Consistent with the U.S. Department of Housing and Urban Development (HUD) Consolidated Plan requirements, the City of Pittsburgh (the “City”) has revised its Citizen Participation Plan (CPP). The CPP provides an opportunity for the community to work in partnership with the City to identify needs and discuss how the proposed allocation of federal funds can address those needs.

Through the CPP, the City hopes to obtain a broad perspective of housing and community development needs from citizens and organizations involved in affordable housing and community development activities. It is intended to provide for and encourage citizen participation with particular emphasis on participation by persons of low- and very low-income who reside in the city.

The City has the responsibility for administration of the Fair Housing Planning process and the Consolidated Plan process, which includes all activities related to development and dissemination of Assessments of Fair Housing (AFH), Five-Year Consolidated Plans (Con Plan), Annual Action Plans, and Consolidated Annual Performance Evaluation Reports (CAPER).

I. Goals

The five major goals of the City citizen participation process are as follows:

1. To provide citizens with adequate and timely information about the range of activities that may be undertaken through its Community Development Block Grant (CDBG) program, the types of activities previously funded in the city, the level of funding available to carry out these activities, and the estimated amount of funds that will benefit low- and very low-income persons;
2. To provide and encourage an appropriate means to ensure public participation, especially the involvement of low and very low-income residents most likely to be affected by the CDBG program and to provide reasonable efforts to ensure continuity of involvement of citizens or citizen organizations throughout all stages of the program;
3. To provide citizens with an adequate opportunity to articulate needs, express preferences about proposed activities, assist in the selection of priorities, and the development the AFH, the Con Plan, the Annual Action Plan, and the CAPER;

4. To provide citizens with the opportunity to assess and submit comments on all aspects of program performance; and
5. To conduct meetings and respond to information requests in a manner consistent with the CPP.

II. Process

The City, in its citizen participation process, has instituted a variety of activities to accomplish the above-stated goals:

A. Assessment of Fair Housing

The City will present a proposed five-year AFH in a public hearing held by the City Council. This AFH will assist the City through incorporation of the purpose and policies of the Fair Housing Act in its planning processes. The Fair Housing Act prohibits discrimination and mandates that HUD funded programs and participants “take significant actions to overcome historic patterns of segregation, achieve truly balanced and integrated living patterns, promote fair housing choice and foster inclusive communities that are free from discrimination,” per Affirmatively Furthering Fair Housing rules and regulations.

The following general steps will be followed in developing the AFH:

1. At least three citizen/community and/or focus group meetings will be held. The citizen/community/focus group meetings may be held in conjunction with the Con Plan process described below in Section II.B.

At these citizen/community/focus group meetings, citizens are encouraged to participate in the development and any revisions to the AFH. Particularly, participation by moderate- and low- income persons and by residents of predominately low- and very-low income neighborhoods, as may be defined by HUD and/or the City. The City shall take appropriate action to encourage all its citizens, including minorities and non-English speaking persons, as well as persons with disabilities, to participate.

2. The City shall encourage the participation of local and regional institutions, Continuums of Care, and other organizations (including businesses, developers, nonprofits, philanthropic organizations and community-based and faith-based organizations) during the development and implementation of the AFH.
3. The City shall encourage participation with public housing agencies (PHA) and residents of public housing and assisted housing developments, resident advisory boards, resident councils and resident management corporations, along with other low-income residents of targeted revitalization areas in which the developments are located, during the development of the AFH. The City

shall make an effort to provide information regarding the AFH, Affirmatively Furthering Fair Housing strategy activities related to its developments and any surrounding communities so that the PHA may make this information available at the annual public hearing(s) for the PHA Plan.

4. The City shall take reasonable steps to provide language assistance to ensure meaningful access to participation by non-English speaking residents of the community. The City assesses language needs through its Language Access Plan (LAP) and its four-factor analysis, which considers: a) the number of or proportion of Limited-English Proficient (LEP) persons served or encountered in the eligible service population; b) the frequency with which LEP persons come into contact with the program; c) the nature and importance of the program; and d) the resources available and costs to the City.
5. As soon as feasible following the start of the public participation process, the City shall make the HUD-provided data available and any other supplemental information the City plans to incorporate into its AFH available to its residents, public agencies and other interested parties. The City may make the HUD-provided data available to the public by cross-referencing to the data on HUD's web site.
6. A notice of the draft AFH and summary of the contents shall be published in a newspaper of general circulation and posted to the City's website at least thirty (30) days prior to the date of the public hearing at the City Council meeting. The notice will also announce the date of the public hearing; the date, time and address to send written public comments on the draft AFH; and the locations where a reasonable number of free copies of the proposed AFH may be reviewed. The summary shall describe the content and purpose of AFH.
7. After a 30-day public comment period, City staff will consider any comments received in writing, or orally at the public hearing, and if necessary, make appropriate changes to the draft AFH. A summary of these comments or views and a summary of any comments or views not accepted and the reasons why, shall be attached to the final AFH.
8. The final AFH is sent to HUD. Copies of the final AFH are published on the City's website and a reasonable number of free copies are available to the public and in a form accessible to persons with disabilities, upon request.

B. Five-Year Consolidated Plan

The City will present a draft Con Plan for the allocation of CDBG program resources at a public hearing at a City Council Meeting. The Con Plan must be completed in a timely manner for submission to HUD. The Con Plan is considered by the City

Council for approval. The following steps will be followed in developing the Con Plan:

1. The first stage of Con Plan development is the analysis of the AFH and the determination of needs based upon input from the general public, neighborhood associations, and other interested parties. City staff will set a timetable with benchmarks to ensure that work on the Con Plan is accomplished in a timely manner.
2. During this process at least three citizen/community and/or focus group meetings will be held. Citizens are encouraged to discuss community needs in various areas such as affordable housing, economic development, infrastructure/public facilities, and public services. The discussions are structured to identify unmet needs of low- and very low-income households that can be addressed through CDBG, and to identify appropriate projects and programs to meet those needs.
 - a. Citizens are encouraged to participate in the development and any Substantial Amendments to the Con Plan. Particularly, participation by moderate- and low-income persons, especially those persons living in predominately low- and very low-income neighborhoods, as may be defined by HUD and/or the City. The City shall take appropriate action to encourage all its citizens, including minorities and non-English speaking persons, as well as persons with disabilities, to participate.
 - b. The City shall encourage the participation of local and regional institutions, Continuum of Care, and other organizations (including businesses, developers, nonprofits, philanthropic organizations and community-based and faith-based organizations) during the development and implementation of the Con Plan.
 - c. The City shall encourage participation with PHAs and residents of public housing and assisted housing developments, resident advisory boards, resident councils and resident management corporations, along with other low-income residents of targeted revitalization areas in which the developments are located, during the development of the Con Plan. The City shall make an effort to provide information regarding the Con Plan activities related to its developments and any surrounding communities so that the PHA may make this information available at the annual public hearing(s) for the PHA Plan.
3. The second stage of Con Plan development is the review of all input. City staff will conduct a preliminary review to assess feasibility and eligibility. City staff shall then prepare a listing of the priority needs based on all input. City staff will use this listing to recommend a broad range of strategies by category based upon identified needs and input at public meetings, hearing(s) and other forums.

4. During the third stage of Con Plan development, the CDBG subcommittee recommends the range of programs and the appropriate percentage of the estimated total funds to be allocated to each eligible subprogram (for example, public facilities and improvements, housing, public services, and economic development). This document becomes the draft Con Plan. A notice announcing the availability of the draft Con Plan for public review and comment will be posted in a newspaper of general circulation at least thirty (30) days prior to the proposed City Council public hearing to consider the draft Con Plan for approval.
5. Staff will consider any written comments received during the comment period or oral comments received during the public hearing, and if necessary, make appropriate changes to the draft Con Plan.
6. The final Con Plan is sent to HUD for approval. Copies of the final Con Plan are published on the City's website and a reasonable number of free copies are available to the public and in a form accessible to persons with disabilities, upon request.

C. Annual Action Plan

1. The Annual Action Plan process begins with a Notice of Funding Availability (NOFA) for CDBG. The NOFA is posted on the City's website, distributed to the City's interested parties list, and published in the non-legal section of a newspaper of general circulation. The NOFA announces an annual public "kickoff" meeting for the CDBG funds. This meeting is designed to encourage low- and very low-income persons, members of minority groups, members of non-English speaking groups, and other residents to express their views and ideas of what they perceive as the community development and housing needs are in the city. The public meeting is held to advise the audience of program requirements, describe the range of activities that may be undertaken, and the application review and approval process.
2. To facilitate the involvement of low- and very low-income persons, non-English speaking persons, and residents in areas most likely to be affected by the programs, staff provides technical assistance in developing project proposals to residents, agencies and community organizations upon request.
3. Additional public meetings may be held at various stages of the Annual Action Plan process, if necessary. Meetings are scheduled at times and locations that permit broad participation by very low and low-income persons. When needed or upon request, translators are made available for non-English speaking attendees and the hearing-impaired.
4. The City has a formal proposal and evaluation process to guide the evaluation, prioritization and selection of project proposals for funding. This process is used

by staff to evaluate each proposal according to the following criteria: (1) eligibility, (2) ability to meet one of the national objectives, (3) target population and demonstrated need, (4) financial analysis, (5) experience and capacity, (6) project readiness and timeliness, (7) past performance, and (8) environmental, historical preservation, relocation, and prevailing wage issues. Upon the posting of the City Council meeting agenda, staff reports are made available to all applicants prior to consideration of the CDBG Subcommittee's funding recommendations.

5. A notice for the draft Annual Action Plan and summary of the available funding for each program will be published in a newspaper of general circulation and posted to the City's website at least thirty (30) days prior to the City Council public hearing date to consider the draft Annual Action Plan. The notice will also announce the dates of the public comment period; the date, time and address of the public hearing; and the location where a reasonable number of free copies may be reviewed.
6. Staff will consider any written comments received during the comment period or oral comments received during the public hearing, and if necessary, make appropriate changes to the draft Annual Action Plan.
7. The adopted Annual Action Plan is sent to HUD for approval. Copies of the adopted Annual Action Plan are published on the City's website and a reasonable number of free copies are available to the public and in a form accessible to persons with disabilities, upon request.

D. Consolidated Annual Performance and Evaluation Report

Every year, the City must submit the CAPER to HUD within 90 days of the close of the program year; by September 30th. In general, the CAPER describes how funds were actually spent and the extent to which these funds were used for activities that benefited low and very low-income people. The purpose of the CAPER is to account for CDBG funded activity in each program year, until the project is "closed-out" in accordance with program requirements.

1. The CAPER shall be made available for review and comment. Notice, public review, and public comments will be made in accordance with the following procedures:
 - a. The City shall provide at least fifteen (15) days advanced notice and availability of a draft CAPER before there is a public hearing. The CAPER notice will be published in the non-legal section of an area newspaper of general circulation in addition to being posted on the City's website.

- b. The notice will also announce the dates of the public comment period; the date, time and address of the public hearing; and the location where a reasonable number of free copies of the draft CAPER may be reviewed.
- c. A City Council public hearing will be held to consider accepting the draft CAPER. Public comments will be accepted during a fifteen (15) day comment period prior to the public hearing as described in the public notice.
- d. Staff will consider any written comments received during the comment period or oral comments received during the public hearing and include them in the “public comment” section of the CAPER.
- e. The adopted CAPER is submitted to HUD for approval.

III. Accessibility of Information

The following information will be available to the public at City Hall during normal working hours:

- a. All mailing and promotional materials.
- b. Records of public meetings.
- c. All key documents, including applications, letters of approval, performance reports, and any other reports required by HUD.
- d. Copies of the regulations and issuances governing the Programs.
- e. Explanation of important program requirements, such as contracting and operations procedures, environmental policies, fair housing, and other equal opportunity requirements, and relocation provisions.
- f. A copy of the CPP.
- g. Copies of each written comment or complaint about the program’s performance and a description of any actions taken and/or written response.

Copies of the AFH, Con Plan, Annual Action Plan, Substantial Amendments to the Annual Action Plan and CAPER shall also be made available at the Pittsburg library. A summary of the public meetings, noticing, and publishing schedule is attached in Appendix A. A sample calendar is attached in Appendix B.

VI. Substantial Amendments to the AFH, Con Plan or Annual Action Plan

If after the AFH, Con Plan, or Annual Action Plan has been submitted and approved by HUD, changes are proposed in the use of program funds (provided the proposed change in funding is greater than \$25,000 from one eligible activity to another, this shall constitute a Substantial Amendment. A change in project/program scope, location and/or beneficiaries will be considered a change in eligible activity. Citizens will be given reasonable notice and an opportunity to comment on Substantial Amendments made to the AFH, Con Plan, or Annual Action Plan.

There will be a public review period of thirty (30) days during which written or verbal comments on the Substantial Amendment may be made before the City Council takes action. A public notice will be published in the non-legal section of at least one local newspaper and posted at City Hall thirty (30) days prior to the meeting. The notice shall describe the proposed amendment and provide the date for the public hearing. Any comments received will be presented to the City Council for consideration. A summary of the comments will be attached to the Substantial Amendment upon submission to HUD.

Examples of actions that are not considered by the City to meet the threshold of "substantial" include:

- An increase or decrease in the number of persons to be served;
- Changes in the program/project scope;
- Changes in how the beneficiaries are viewed (presumed benefit populations or low/mod clientele that require different documentation standards);
- A less than \$25,000 increase or decreases in the amount of funds allocated to an approved project or activity to achieve the original purpose of the activity;
- Changes in the agency performing the work due to merger with another agency if the new agency is already being funded by the Contra Costa Consortium and is performing in a satisfactory manner.

Examples of action that are considered to meet the threshold of "substantial" include:

- Any deletion or addition of an activity, or change in the use of CDBG funds from one eligible activity to another;
- Changes in an agency performing the work due to merger if the new agency is not currently being funded by the Consortium with CDBG funds; and/or
- A greater than \$25,000 increase or decrease to an activity or the movement of over \$25,000 (singularly or in aggregate) from one activity to another.

VII. Eligible Activities within Con Plan

The Con Plan established the following goals for programs and projects funded with CDBG.

Non-housing Community Development

- (a) CD-1: General Public Services: Ensure that opportunities and services are provided to improve the quality of life and independence for lower-income persons, and ensure access to programs that promote prevention and early intervention related to a variety of social concerns such as substance abuse, hunger and other issues.
- (b) CD-2: Non-Homeless Special Needs Population: Ensure that opportunities and services are provided to improve the quality of life and independence for persons with special needs, such as elderly/frail elderly, persons with disabilities, battered spouses, abused children, persons with HIV/AIDS, illiterate adults, and migrant farmworkers.
- (c) CD-3: Youth: Increase opportunities for children/youth to be healthy, succeed in school, and prepare for productive adulthood.
- (d) CD-4: Fair Housing: Continue to promote fair housing activities and affirmatively further fair housing.
- (e) CD-5: Tenant/Landlord Counseling: Support the investigation and resolution of disagreements between tenants and landlords and to educate both their rights and responsibilities, so as to help prevent people from becoming homeless and to ensure fair housing opportunity.
- (f) CD-6: Economic Development: Reduce the number of persons with incomes below the poverty level, expand economic opportunities for low- and very low- income residents and increase the viability of neighborhood commercial areas.
- (g) CD-7: Infrastructure and Accessibility: Maintain quality public facilities and adequate infrastructure, and ensure access for the mobility-impaired by addressing physical access barriers to public facilities.
- (h) CD-8: Administration/Planning: Support development of viable urban communities through extending and strengthening partnership among all levels of government and the private sector and administer federal grant programs in a fiscally prudent manner.

Affordable Housing

- (a) AH-1: Maintain and Preserve Affordable Housing. Maintain and preserve the existing affordable housing stock, including single family units, multi-family units at risk of loss to the market and housing in deteriorated lower income neighborhoods.

- (b) AH-2: Increase Affordable Rental Housing Supply. Expand housing opportunities for low-income to extremely low-income households by increasing the supply of decent, safe, and affordable rental housing.
- (c) AH-3: Increase Affordable Supportive Housing Supply. Expand housing opportunities for persons with special needs, including seniors, persons with disabilities, persons with HIV/AIDS, veterans and the homeless by increasing appropriate and supportive housing.
- (d) AH-4: Increase homeownership opportunities for moderate- to low- income households. Increase homeownership opportunities via the construction, acquisition, and/or rehabilitation of housing units; and/or direct financial assistance.

Homelessness

- (a) H-1: Permanent Housing for Homeless. Assist the homeless and those at risk of becoming homeless by providing emergency, transitional, and permanent affordable housing with appropriate supportive services.
- (b) H-2: Prevention of Homelessness. Expand existing prevention services including emergency rental assistance, case management, housing search assistance, legal assistance, landlord mediation, money management and credit counseling.

VIII. Residential Anti-displacement and Relocation Assistance Plan

The City has established the **Residential Anti-displacement and Relocation Assistance Plan** to minimize displacement of persons or businesses as a result of projects funded with CDBG funds.

IX. Complaint Process

Citizens have an opportunity to register complaints by letter, telephone, email or in person directly to the City at the following address: City of Pittsburg, CDBG Program, 65 Civic Avenue, Pittsburg, CA California, 94565; by calling (925) 252-4155; or emailing mvenenciano@ci.pittsburg.ca.us.

All written complaints will be answered in writing within 15 working days. Citizens are encouraged to initially register complaints by telephone, directly to the program staff involved in the relevant program, since oftentimes complaints can be resolved satisfactorily at this level. Staff will investigate complaints and respond as quickly as possible.

Citizens not satisfied by the response of the City staff may request further review of their complaint by the Community Services Director. The Community Services Director will

respond in writing to all written complaints within thirty (30) working days of their receipt, where practicable.

Citizens may also file complaints directly to HUD. Per HUD procedures, HUD will forward the complaint to the City Manager's Office. A copy of the letter accompanying the complaint will be sent to complainant. The City Manager's Office has fifteen (15) working days from the date of the HUD letter to respond directly to the complainant and must forward a copy of the response to HUD for its review.

All documentation including final disposition of the complaint will be retained by the City for a period of no less than three years from the date of disposition.

APPENDIX A

Summary of Public Meetings, Noticing, and Publishing

1. Five-Year Con Plan

- (a) At least three citizen/community and/or focus group meetings

Noticing: By invitation and published in non-legal section of at least one local newspaper of general circulation at least thirty (30) days prior to the first meeting. The notice is also posted on the City's website.

- (b) At least two public meetings

- i. During development

Noticing: Letters (regular U.S. mail and/or email) are sent to interested party mailing list and posted on the City's website and at City of Pittsburg, 65 Civic Avenue, Pittsburg, CA 94565 at least ninety-six (96) hours prior to the date of the meeting.

- ii. City Council Meeting to consider Con Plan

Noticing: Published in the non-legal section of at least one local newspaper at least thirty (30) days prior to the date of the meeting. The notice posted on the City's website and at City Hall located at 65 Civic Avenue, Pittsburg, CA 94565. The notice includes a summary of the proposed Con Plan.

- (c) Publishing: A copy of the Con Plan will be made available at the Pittsburg library, at the City Clerk's Office at City Hall and on the City's website.

2. Annual Action Plan – 1st Year of Two-Year and Three-Year Funding Cycles (“Non-housing” and “Housing” Community Development priorities)

- (a) Notice of funding availability (NOFA)

Noticing: Letters (regular U.S. mail and/or email) are sent to interested party mailing list and published in non-legal section of at least one local newspaper at least thirty (30) days prior to application due date.

- (b) At least two public meetings

- i. During development

Noticing: Letters (regular U.S. mail and/or email) are sent to all CDBG applicants and meeting notice posted on the City's website and at City Hall, 65 Civic Avenue, Pittsburg, CA 94565 at least ninety-six (96) hours prior to the date of the meeting.

- ii. City Council Meeting to consider Annual Action Plan

Noticing: A notice is published in the non-legal section of at least one local newspaper at least thirty (30) days prior to the date of

the meeting, and the notice is posted on the City's website and at City Hall, 65 Civic Avenue, Pittsburg, CA 94565.

- (c) Publishing: A copy of the Annual Action Plan will be made available at the Pittsburg library, at the City Clerk's Office at City Hall and on the City's website.

3. Annual Action Plan – Renewal Years of the Two-Year and Three-Year Funding Cycles

No new grant proposals are solicited or accepted for the renewal years of the Two-year and Three-Year funding cycles, unless necessary. Instead, numerous factors are considered that might lead to changes in the level of funding for existing subrecipients. These may include changes in the economic conditions, changes in demographics, program performance, compliance issues, or results of a grant monitoring. Public input is sought on these and any other issues pertaining to the CDBG program that may be of interest to the public.

If new grant proposals are necessary during the renewal years, the process includes:

- (a) Notice of funding availability (NOFA)

Noticing: Letters (regular U.S mail and/or email) are sent to interested party mailing list and published in non-legal section of at least one local newspaper at least thirty (30) days prior to application due date.

- (b) At least two public meetings

- i. During development

Noticing: Letters (regular U.S mail and/or email) are sent to all CDBG applicants and meeting notice posted on the City's website and at City Hall, 65 Civic Avenue, Pittsburg, CA 94565 at least ninety-six (96) hours prior to the date of the meeting.

- ii. City Council Meeting to approve Annual Action Plan

Noticing: A notice is published in the non-legal section of at least one local newspaper at least thirty (30) days prior to the date of the meeting and the notice is posted on the City's website and at City Hall, 65 Civic Avenue, Pittsburg, CA 94565.

- (c) Publishing: A copy of the Annual Action Plan will be made available at the Pittsburg library, at the City Clerk's Office at City Hall and on the City's website.

4. Substantial Amendment

- (a) At least one public meeting

- i. City Council Meeting to approve the Substantial Amendment
Noticing: Published in the non-legal section of at least one local newspaper, posted on the City's website and at City Hall, 65 Civic Avenue, Pittsburg, CA 94565 at least thirty (30) days prior to the date of the meeting.

- (b) Publishing: A copy of the Substantial Amendment will be made available at the Pittsburg library, at the City Clerk's Office at City Hal, and on the City's website.

5. CAPER

- (a) City Council Meeting to approve CAPER
Noticing: Published in non-legal section of at least one local newspaper at least fifteen (15) days prior to the date of the meeting. The notice will be posted on the City's website and at City Hall, 65 Civic Avenue, Pittsburg, CA 94565 at least ninety-six (96) hours prior to the date of the meeting.

- (b) Publishing: A copy of the CAPER will be made available at the Pittsburg library, at the City Clerk's Office at City Hall and on the City's website.

APPENDIX B

Sample Calendar

September	Issue Notice of Funding Availability (NOFA)
October/November	Conduct Funding Kickoff Meeting
December	Applications due
January/February	Applicant Interviews
March/April	Applications / Staff Recommendations considered by Committees
May	City Council review and approval of Annual Action Plan Submit Annual Action Plan to HUD before May 30th
June	Subrecipient Meeting, and Contract Negotiations
July	Start of new Fiscal Year
August	Program monitoring (ongoing through May) CAPER Public Notice
September	CAPER submitted to HUD by September 30 th
October	Semi-annual labor standards report MBE/WBE Report