

# **CITY OF LANCASTER**

## **U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT CONSOLIDATED PLAN AND STRATEGY**

### **CITIZEN PARTICIPATION PLAN**

#### **I INTRODUCTION**

The City of Lancaster must adopt and adhere to a Citizen Participation Plan to receive federal funds for the Community Development Block Grant (CDBG) program. The Citizen Participation Plan covers the five-year Consolidated Plan, each subsequent Annual Action Plan, each year's Consolidated Annual Performance Evaluation Report, and any Consolidated Plan Amendments.

The citizen Participation Plan includes 14 sections.

1. Introduction
2. Purpose
3. Standards of citizen participation
4. Encouragement of citizen participation
5. Citizen participation opportunities
6. Public meetings and public hearings
7. Public comments
8. Public information and access to records
9. Citizen participation plan coordinator
10. Technical Assistance
11. Complaints
12. Amendments to the consolidated plan
13. Criteria for substantial amendment
14. Substantial Amendment Process

#### **II PURPOSE OF THE CITIZEN PARTICIPATION PLAN**

This Citizen Participation Plan sets forth the policies and procedures for citizen participation in Lancaster's consolidated planning process. The Administrative and Community Services (ACS) Department, as the lead agency for the Consolidated Plan, is responsible for the citizen participation process.

The Citizen Participation Plan encourages citizens to participate in the consolidated planning process from the beginning. It outlines the procedures for community approval of the Consolidated Plan, for addressing concerns, objections and complaints, and for making amendments to the Plan after approval.

### **III STANDARDS OF CITIZEN PARTICIPATION**

The City of Lancaster shall provide a process of citizen participation at the community-wide level with regard to the overall preparation of the Consolidated Plan and its annual funding programs. The City of Lancaster recognizes and appreciates the value of citizen input for community development planning.

- All aspects of citizen participation shall be conducted in an open manner with freedom of access for all interested persons.
- The City shall make reasonable efforts to ensure the involvement of low-, very low-, and extremely low-income persons, members of minority groups, residents of areas where a significant amount of activity is proposed or ongoing, the elderly, the disabled, the business community, and civic groups who are concerned about the program.
- The City shall make reasonable efforts to ensure continuity of involvement of citizens or citizen organizations throughout all stages of the Consolidated Plan process.
- Citizens shall be provided adequate and timely information to enable them to be meaningfully involved in important decisions at all stages of the program.
- Citizens shall be encouraged to submit their views and comments regarding the Consolidated Plan and its funding programs.

### **IV ENCOURAGEMENT OF CITIZEN PARTICIPATION**

The City shall encourage and provide for citizen participation in all phases of the Consolidated Plan process including any amendments to the Plan and the annual performance report process. Although the City will encourage participation from all facets of the community, including minorities and non-English speaking persons, as well as persons with physical impairments, emphasis will be placed on the involvement of low-, very-low, and extremely low-income residents where housing and community development funds may be spent.

### **V CITIZEN PARTICIPATION OPPORTUNITIES**

The City of Lancaster and the ACS Department urges citizens to voice their concerns and share their ideas concerning its federal programming. It welcomes comments and suggestions regarding the Citizen Participation Plan, the Consolidated Plan (including the

Annual Action Plan), and the Consolidated Annual Performance and Evaluation Report (CAPER).

To encourage citizen participation, the ACS Department will undertake the following activities each year.

- Hold at least two public meetings at different times during the development of the Consolidated Plan and Strategy to garner citizen comments on needs, strategies, actions, and projects.
- Offer at least 30-day comment periods on the draft versions of the City of Lancaster's Consolidated Plan and Strategy, each Annual Action Plan, and any substantial amendments to the Consolidated Plan or Action Plan.
- Offer at least a 15-day comment period on the Consolidated Annual Evaluation and Performance Report prior to submitting the final report to HUD.
- Post both draft and final versions of the City of Lancaster's Consolidated Plan and Strategy, Annual Action Plan, CAPER and any substantial amendments to the Consolidated Plan or Action Plan on the City's internet site.

## **VI PUBLIC MEETINGS AND PUBLIC HEARINGS**

Public meetings and public hearings regarding the consolidated plan process are held to address housing and community development needs and development of proposed activities; to obtain citizen input; and to respond to citizen recommendations and questions in these and other areas related to the plan process. At least two public meetings will be held at different times during the development of the Consolidated Plan and Strategy document. At least one public hearing will be held during each program year which begins on July 1 of each year to receive citizen input and to respond to citizen recommendations and questions related to the consolidated plan process prior to approval of the Consolidated Plan and Strategy Annual Action Plan documents.

Notice of all public hearings shall be published at least 30 days prior to the time of the hearing and shall include times, dates, locations and the topics to be discussed at the hearing.

Public hearings will be held at Lancaster City Hall which is centrally located in the community and accessible to the physically disabled. Public hearings will be held at times convenient to the general public and to the potential and/or actual beneficiaries of the federally-funded programs.

In the event that a significant number of non-English speaking residents can be reasonably expected to attend and participate in a public hearing or public meeting or the

City has been notified in advance that non-English speaking residents will be attending a public meeting or public hearing, the City will exercise best efforts to provide translation services for those residents. The City has staff members fluent in Spanish who are able to provide translation services. If services are required for other languages, the City will exercise best efforts to secure a translator from private sources.

To provide full access to programs under the Consolidated Plan for persons with disabilities, the City staff will select only sites for public meetings and public hearings that are accessible for persons with physical disabilities and conduct outreach to community organizations that represent persons with disabilities as part of the Consolidated Plan process.

## **VII PUBLIC COMMENTS**

Citizens are encouraged to submit views, proposals, and comments concerning the preparation of the final Consolidated Plan, Annual Action Plans, amendments to the Plan, and performance and evaluation reports in writing or orally at formal public hearings. The City will provide written responses to any submitted written proposals and/or comments relating to any portion of the Consolidated Plan process within 15 working days of receipt of the proposals and/or comments when practicable. If a response cannot be completed within 15 working days, due to a lack of final determination concerning the issue, the City will provide a progress report and estimate of when final determination can be expected.

Proposals and comments received during the consolidated plan process will be reviewed by the appropriate staff members and, where considered pertinent, will be submitted with recommendations to the City Council for determination during the public hearing on the final Plan document. A summary of these comments and views and a summary of any comments or views not accepted, and the reasons therefor, shall be attached to the final Consolidated Plan (including the Annual Action Plan), substantial amendment to the Consolidated Plan, Citizen Participation Plan, or Consolidated Annual Performance and Evaluation Report (CAPER).

## **VIII PUBLIC INFORMATION AND ACCESS TO RECORDS**

Citizens, public agencies, and other interested parties may review information and records relating to the Consolidated Plan. The City will provide full and timely public access to HUD programs under the Consolidated Plan including the following documents that the CDBG Administrator maintains on file consistent with applicable state and local laws regarding personal privacy and obligations of confidentiality:

- Federal Laws: Summary of the Housing and Community Development Act of 1977; Title I of the Housing and Community Development Act of 1974, as amended; the National Affordable Housing Act, as amended.
- Federal Regulations: CDBG Program regulations and related issuances and provisions (i.e. Uniform Relocation Assistance) including Title 24 Code of Federal Regulations, Part 570 Community Development Block Grants and Title 24 Code of Federal Regulations, Part 42 Consolidated Submission for Community Planning and Development Programs
- Consolidated Plans, Annual Action Plans, Citizen Participation Plan, and Consolidated Annual Performance and Evaluation Reports
- U.S. Department of Housing and Urban Development (HUD) information: grant agreements, audit records, evaluation reports, approval letters, and other related correspondence
- Public meeting records: public meetings, informal meetings with civic and neighborhood groups, and related notifications pertaining to programs under the Consolidated Plan process

Documents relevant to the CDBG program shall be made available at the City Clerk Office located at City Hall during normal working hours for citizen review upon either a written or oral request. Documents are available for public review from 8 a.m. to 6 p.m. Monday through Thursday and 8 a.m. to 5 p.m. on Friday at Lancaster City Hall, 44933 Fern Avenue, Lancaster, CA 93534.

To locate records and arrange space for viewing, the CDBG Coordinator requests written notice at least three days prior to review. Review of records that are more than two years old will require a seven-day notice. Requests for multiple copies of the same documents may be subject to a per-page copying charge that will not exceed the copying charge to the City and may require additional time to process.

## **IX CITIZEN PARTICIPATION PLAN COORDINATOR**

The Community Development Block Grant (CDBG) Administrator also coordinates citizen participation and consultation. The administrator's responsibilities include the following activities relative to citizen participation:

1. Organizing public hearings and meetings as well as scheduling meetings with neighborhood and civic groups when appropriate.
2. Recording and responding to all written comments and complaints regarding activities funded through the Consolidated Plan.

3. Ensuring distribution of citizen comments and complaints to the appropriate City staff.
4. Ensuring compliance with the Citizen Participation Plan and all applicable federal regulations regarding citizen participation.

## **X TECHNICAL ASSISTANCE**

Upon request, the City will provide technical assistance to organizations that wish to develop proposals for funding assistance under any programs covered by the Consolidated Plan. The City of Lancaster especially encourages groups representative of extremely low- to moderate-income persons to request technical assistance. The City will determine the level and type of technical assistance on a case-by-case basis.

Additionally, the City welcomes and encourages continuous dialogue with citizens and community groups to encourage participation, especially to those citizens affected by Community Development Block Grant activities. City staff will be available to speak to any interested community group to explain the consolidated plan process and any funding programs covered by the Plan. Technical assistance may be obtained by contacting the City's Consolidated Plan staff at (661) 723-6243.

## **XI COMPLAINTS**

The City will provide a written response to every formal written citizen complaint or substantive objection related to the Citizen Participation Plan, the Consolidated Plan (including the Annual Action Plan), Substantial Amendments to the Consolidated Plan, and the CAPER within 15 working days. A formal written complaint or substantive objection regarding the previous mentioned documents or activities should be forwarded to the City of Lancaster City Clerk Department, 44933 Fern Avenue, Lancaster, CA 93534.

Such substantive objections must address the following issues (specified in HUD regulations):

- The City's description of needs and objectives in its Consolidated Plan is plainly inconsistent with available facts and data.
- The City's proposed activities are plainly inappropriate to meeting the needs and objections identified by the City.
- The City's application does not comply with HUD requirements regulating programs under the Consolidated Plan or other applicable laws.

- The City's application proposes activities that are otherwise ineligible as specified in applicable HUD regulations.

A summary of citizen comments and complaints and summary of any comments not accepted (and the reasons why the complaint was not accepted) will be attached to the final Consolidated Plan Annual Action Plan, CAPER, or Substantial Amendment.

## **XII AMENDMENTS TO THE CONSOLIDATED PLAN**

The Consolidated Plan regulations (§91.505) require the City of Lancaster to amend its approved Consolidated Plan whenever it makes one of the following decisions:

1. To change allocation priorities or change the method of distributing CDBG funds
2. To carry out an activity, using CDBG funds (including program income), not previously described in the Annual Action Plan
3. To change the purpose, scope, location, or beneficiaries of an activity previously approved in the Annual Action Plan

When the City decides to make a substantive change which requires the Consolidated Plan or Annual Action Plan to be amended, it shall publish a notice of the change and provide a reasonable opportunity for citizens to comment on the proposed amendment. The City will make the amendment public and will notify HUD that the City made an amendment. The City will ensure that all amendments are contained in the Consolidated Annual Performance and Evaluation Report submitted to HUD.

The City reserves the right to make non-substantive changes to the Consolidated Plan without opening a public comment period.

## **XIII CRITERIA FOR SUBSTANTIAL AMENDMENT**

The Consolidated Plan regulations consider certain amendments to be *substantial amendments* that require a public comment period and additional citizen participation. The City of Lancaster defines a *substantial amendment* as:

- Changes in the use of CDBG funds from one eligible activity to another (§91.105(c)(1)). Budget increases or decreases, independent of any other changes, do not constitute a substantial amendment

The City of Lancaster also defines a substantial amendment as:

- Any reduction of funds for an approved activity where the original objective can no longer be met.
- Any new activity not previously included in the Consolidated Plan Annual Action Plan
- A monetary change which exceeds 25% of the total amount funded for a particular project.

If the City should need to make a substantial amendment to its approved Consolidated Annual Plan, the City will follow the same citizen participation process described for the Annual Action Plan, including a 30-day public comment period, a public hearing, and a notice placed in a local newspaper informing the public of the proposed substantial amendment.

In finalizing the substantial amendment, the City will consider any written or verbal citizen comments received at the public hearing. It will attach a summary of these comments (including a summary of any comments not accepted and the reasons it did not accept them) to the substantial amendment. Please see Section XI, "Complaints," of this Citizen Participation Plan for information about where to send comments.

#### **XIV SUBSTANTIAL AMENDMENT PROCESS FOR COVID-19 RESPONSE**

In compliance with HUD memos, dated March 31, 2020 and April 9, 2020, the following amendments(s) are added as part of this Citizen Participation Plan.

These amendments were set up as a response to the recent novel coronavirus (COVID-19) pandemic:

- Addition of disaster response and declaration of emergency public notice requirements (reduction of 15 days to 5 days minimum) and public comment (reduction of 30 days to 5 days);
- Amendments to the Consolidated Plan and Annual Action Plan that meet the Substantial Amendment general provisions as well as expeditious allocation of uncommitted funds to emergency activities, with a reduced notice and comment period to accommodate swift allocation of funds;
- Include provisions relative to Consolidated Plan citizen participation, Community Development Block Grant (CDBG) and Grant waivers made available under the Coronavirus Aid, Relief, and Economic Security (CARES) Act;
- Include virtual hearings as an allowed method for citizen participation;



CDBG Citizen Participation Plan  
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- Make minor edits that do not change current citizen participation policies. In the event virtual hearings are used, real-time responses and accommodations for persons with disabilities and/or with limited English proficiency will be made available to the greatest extent possible.