

Citizen Participation Plan for the Los Angeles Urban County

Revised on April 8, 2020 to:

- **Include virtual hearings as an allowed method for citizen participation;**
 - **Update the types of declared disasters or emergency events to include terrorism and infectious diseases, such as the recent coronavirus 19 (COVID-19) pandemic, that may necessitate expedited substantial amendments;**
 - **Provide details on possible actions, including reprogramming of funding and types of possible activities, that may be undertaken in response to the COVID-19 pandemic;**
 - **Includes provisions relative to Consolidated Plan citizen participation, Community Development Block Grant, and Emergency Solutions Grant waivers made available under the Coronavirus Aid, Relief, and Economic Security (CARES) Act;**
 - **Make minor edits that do not change current citizen participation policies.**
- Please be advised that if 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.**

Please visit this webpage for future revisions to this plan.

Los Angeles County Development Authority

CITIZEN PARTICIPATION PLAN

The Los Angeles County Development Authority (LACDA) must develop and follow a Citizen Participation Plan to receive federal funds for the Community Development Block Grant (CDBG), HOME Investment Partnerships (HOME), and Emergency Solutions Grant (ESG) programs. The Citizen Participation Plan covers the five-year Consolidated Plan, the Assessment of Fair Housing, each subsequent Annual Action Plan, each year's Consolidated Annual Performance and Evaluation Report, and any Substantial Amendments to the Consolidated Plan or its five Annual Action Plans.

This Citizen Participation Plan is organized in the following structure, and includes an Anti-Displacement and Relocation Plan and plans for citizen participation for environmental reviews and Section 108, EDI, and BEDI grant programs:

- I. PURPOSE**
- II. CITIZEN PARTICIPATION OPPORTUNITIES**
- III. AMENDMENTS AND ADMINISTRATIVE UPDATES**
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- V. TECHNICAL ASSISTANCE**
- VI. COMPLAINTS AND GRIEVANCES**
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- VIII. CITIZEN PARTICIPATION REGARDING AFFIRMATIVELY FURTHERING FAIR HOUSING AND THE ASSESSMENT OF FAIR HOUSING**

I. PURPOSE

On February 5, 1988, the President signed into law the Housing and Community Development Act of 1987, which, among its many provisions, requires jurisdictions to develop and follow a written Citizen Participation Plan. The Los Angeles County Citizen Participation Plan is intended to ensure full citizen participation in the Los Angeles Urban County program. All community development, housing, and emergency shelter activities, either proposed or currently being implemented under the CDBG, ESG, and HOME programs are governed by the provisions herein.

This Citizen Participation Plan sets forth the policies and procedures for citizen participation in Los Angeles County's Assessment of Fair Housing and Consolidated Planning Process. The LACDA, as the lead agency for the Assessment of Fair Housing and Consolidated Plan, carries out the responsibility for following the citizen participation process.

This 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 and complaints, and for making amendments to the plan after approval.

Participation Emphasis

The Citizen Participation Plan emphasizes the need to provide citizens with adequate information and to allow them the opportunity to give meaningful input. It encourages participation among our potential program beneficiaries: persons of extremely low, low, and moderate incomes and residents of slum and blighted areas. In addition, it allows citizens to participate in a collaborative process that involves proposing activities and assessing performance.

Levels of Citizen Involvement

This Citizen Participation Plan delineates two (2) levels of citizen involvement. It discusses the extent of involvement required at the local or city level and that required at the regional or countywide level. The LACDA, as the administrator of the Los Angeles Urban County program, assumes responsibility for compliance with all citizen participation provisions.

Definition of Terms

For this Citizen Participation Plan, specific definitions must be provided. The LACDA and its participating cities are referred to as administering agencies. The term Consolidated Plan refers to both the five-year Consolidated Plan and the Annual Action Plan. Public hearing refers to both public hearings, including virtual hearings, and community meetings for purposes of this Citizen Participation Plan as well as for meeting the requirements for public hearings under the CDBG regulations [Title 24 of the Code of Federal Regulations, Part 91.105(e)(1)].

Because of the diversity of the Los Angeles Urban County and its CDBG beneficiaries, each administering agency may exercise the liberty to expand on the provisions herein. This Citizen Participation Plan and its mandates may not be construed to restrict the responsibility or authority of the County of Los Angeles or any of its CDBG participating cities for the development and execution of its community development program and the Consolidated Plan.

II. CITIZEN PARTICIPATION OPPORTUNITIES

Each aspect of the Consolidated Plan requires different levels of citizen participation. Specific activities are described in each section of the plan itself.

Advertisement and Public Notice

Citizens must be given adequate notice of all hearings and meetings through advertisements in the Los Angeles Times and/or other local publications of general circulation, serving the community of affected citizens. Public notice shall indicate the date, time, location, and purpose(s) of the meeting as well as disclose information that will contribute significantly to the public's understanding of the issues to be discussed at the meetings and hearings. In areas where the LACDA has determined that there is a substantial non-English speaking population within its jurisdiction, the hearing notice will be published in English the appropriate language(s). Public hearings and community meetings will be advertised at least 14 calendar days in advance of the hearing and at the beginning of official public comment periods.

The LACDA may use additional or alternative means of advertising as appropriate, including but not limited to: posting notices on the LACDA's Web site; mailing flyers, distributing or posting notices at libraries, parks, and other public areas; posting banners at public venues; placing radio public service announcements; developing press releases; and sending notices to community organizations.

Access to Meetings for Persons with Disabilities and Non-English-Speaking Persons

Administering agencies shall ensure that architectural barriers do not preclude the attendance of disabled persons at meetings and hearings convened under this Citizen Participation Plan. In addition, accommodations will be made, upon request, for attendees who are either visually or hearing impaired.

For requests for special accommodations or materials in an alternative format, please contact Raymond Webster at (626) 586-1755 (VOICE) or the California Relay Service at (800) 735-2959 (TTY) and reference Mr. Webster with at least five business days' notice.

For local meetings in areas with significant non-English speaking population, translators shall be provided and meeting materials made available in the appropriate languages.

If virtual hearings are used, real-time responses and accommodation for persons with disabilities and/or with limited English proficiency will be made available to the greatest extent possible. Also, the virtual hearing method will only be used in lieu of in-person hearing if national or local health authorities recommend social distancing and limit public gatherings for public health reasons.

Limited English Proficient Persons and the Language Access Plan

The LACDA will make every effort to ensure that Limited English Proficient (LEP) persons have meaningful access to federally funded programs and services as is required under Title VI of the Civil Rights Act of 1964.

The Los Angeles Urban County has a diverse population where many languages are spoken. The major languages spoken other than English in the Los Angeles Urban County service area are Spanish, Chinese, Korean, and Russian. A substantial number of persons that speak these languages do not speak English or speak English very well and are considered Limited English Proficient (LEP).

Regardless of which language a person speaks or their ability to speak English, the LACDA will make every effort to ensure that they have meaningful access to federal funding services through either oral interpretation or written translations of vital documents.

Since the Los Angeles Urban County has such a large number of LEP persons, all countywide public notices and public hearings must ensure that language services are provided or available. For example, each year the public notice for the Annual Action Plan will be printed in various languages and translation services will be provided as necessary for the public hearing.

However, many programs and services delivered within the Los Angeles Urban County, including

those carried out by participating cities, have distinct service areas and, as such, an assessment must be made by each agency administering the activity to determine which language services should be provided based on the identified LEP population in the service area.

To assist participating agencies, the LACDA has developed a bulletin instructing them to conduct the four-factor analysis and develop their own Language Access Plan (LAP) to ensure that LEP persons have meaningful access to their federally funded programs and services. The LACDA will also provide technical assistance to assist the agencies in conducting the four-factor analysis and in developing their Language Access Plans.

The four-factor analysis is as follows:

Factor 1: Determine the number or proportion of LEP persons served or encountered in the eligible service area.

Factor 2: Determine the frequency with which LEP persons come in contact with the program.

Factor 3: Determine the importance of the information, services, program, or activity to people's lives.

Factor 4: Assess costs versus resources and benefits in providing language services.

The LACDA is confident that no person will be denied federally funded services based on their ability to speak English.

Information and Access to Public Records

All citizens will be given reasonable access to information and records regarding the Consolidated Plan and the programs and projects it covers. Such information and records will be available at the offices of the administering agencies, Monday through Friday from 8:00 a.m. to 5:00 p.m., or within normal business hours of the agencies. Information will also be posted online at www.lacda.org.

Copies of the Consolidated Plan shall be available upon request. These documents may be obtained from the LACDA in accordance with the LACDA's fee policy for copies.

The Consolidated Plan, Assessment of Fair Housing, Action Plan, and Consolidated Annual Performance Report (CAPER) will be available in alternative formats accessible to persons with disabilities, or other languages upon request. Please telephone the LACDA at (616) 586-1755 to request copies in alternative formats. You may also submit your request in writing to the following:

Los Angeles County Development Authority
700 W. Main Street
Alhambra, CA 91801
Attn: Community & Economic Development Division/Consolidated Plan

Most reasonable requests shall be filled at no cost to the public. Administering agencies reserve the right to charge a fee for duplicating documents when such requests are not reasonable. Reasonableness shall be determined by a combination of the number of copies requested; the size (pages and/or dimensions) of the document; the length of time needed to compile the data; and the

direct costs to the administering agency to duplicate the document.

Copies may be requested in person, by mail, email or by telephone. Program records maintained on file, or requiring research and compilation, shall be provided within a reasonable period time upon receipt of a written request, which specifically states the information desired. All books and records relating to the Assessment of Fair Housing and the Consolidated Plan shall be maintained and available for a minimum period of five years. Current copies of all major documents related to the Assessment of Fair Housing, Consolidated Plan, and Consolidated Annual Performance and Evaluation Report (CAPER) will be posted on the LACDA's Web site at www.lacda.org.

This paragraph is not intended to supersede the provisions of the Freedom of Information Act of 1966, as amended, which covers all programs and activities in the Consolidated Plan as well as the Assessment of Fair Housing.

Citizen comments for all matters related to the Assessment of Fair Housing and the Consolidated Plan can be directed to:

Los Angeles County Development Authority
700 W. Main Street
Alhambra, CA 91801
Attn: Community and Economic Development Division/Consolidated Plan

Citizen Participation in Unincorporated Areas

Before submission of the five-year Consolidated Plan and each Annual Action Plan, administering agencies must solicit citizen input at all stages of the community development planning process through a public meeting. The meeting will be held at the LACDA which is centrally located to Los Angeles Urban County residents. In the event that the LACDA is closed to the public, virtual public meetings and hearings may be used instead. Check www.lacda.org for notices of all public meetings, including virtual hearings.

The LACDA holds at least one (1) community meeting each year at the beginning of the planning process. Citizens are notified of the location of the community meeting through advertisements in several newspapers not less than 14 calendar days before the meeting. The meeting is held to obtain citizens' views on housing and community development needs and to allow citizens to review program performance.

To facilitate substantive input, persons attending the meeting are furnished with the following information:

- The range of housing and community development activities that may be undertaken with CDBG (including U.S. Department of Housing and Urban Development (HUD) guaranteed loans), ESG, and HOME funds.
- Specific examples of activities that were undertaken to benefit their community during the most recently completed program year including descriptions of these activities, their locations, and the funds allocated or expended. At least one copy of the annual CAPER will

be available to the public for this purpose.

- The amount of funds expected to be available to the Urban County (including the annual grants, program income, surplus from urban renewal settlement, and proceeds from HUD guaranteed loans).
- The amount of funds expected to be available to each Supervisorial District for the unincorporated areas of the County (including the annual grant allocation, program income, and land proceeds).

Community Meeting Format

Citizens are invited to attend the community meeting to learn about the programs and services available to them through the LACDA and other Urban County CDBG programs. They are also invited to express their views on their neighborhood's housing, community development, and fair housing needs. The community meeting is a comprehensive, interactive forum for citizens, facilitated by LACDA staff, to identify community and economic development needs.

The goals of the meeting include increasing public attendance through a proactive marketing strategy, which includes partnerships with community leaders and organizations, direct mailings to unincorporated area residents, and/or local advertisements. The meeting provides a less formal and more interactive forum using examples of existing projects benefiting the neighborhood and a discussion of the community needs and local programs. In addition, a survey is administered to receive input on neighborhood housing and community development needs. In the development of the Consolidated Plan and the Assessment of Fair Housing (outlined in section VIII), the LACDA may hold joint public input meetings to increase input for both studies.

Briefings

In addition to the annual community meeting, the LACDA may also involve the public in citizen advisory meetings and or attend other meetings to inform the public on specific CDBG or HOME funded programs. The LACDA also holds or participates in homebuyer fairs throughout the County to ensure that residents are aware of CDBG and HOME funded programs that offer first-time homebuyer assistance. Lastly, the LACDA, upon request by a Supervisorial District or the public, may attend regularly scheduled meetings by various nonprofit or civic organizations to inform them of available CDBG-funded programs as well as the availability of funding within their geographic area.

Involvement of Public Housing Residents and Section 8 Participants

LACDA specifically markets the community meeting to public housing residents and Section 8 participants through direct mailings, flyers, and announcements at resident council meetings to encourage them to participate in the planning process. Transportation to the community meeting may also be provided to public housing residents and/or Section 8 participants.

Community Meeting Comment Period

County residents have the opportunity to present oral or written comments by attending the community meeting. Residents unable to attend the community meeting are invited to submit written comments and/or surveys during the community meeting period and up to 30 days after the community meeting for inclusion in a summary of the community's input used during the County's

planning process.

The LACDA will include all public comments made both orally and in writing in the Consolidated Plan. The LACDA will attach a summary of these comments and a summary of comments not accepted (and the reasons therefore) to the Consolidated Plan.

Citizen Participation in Participating Cities

I. Planning Process

Cities annually plan the use of their CDBG funding, determining how best to use these funds to support the housing and community development needs of their community. This planning is done in conjunction with a city's staff, elected officials, and the public. The following describes the difference between projects that are included in the Action Plan from those that are not:

Annual Activity Planning

CDBG activity planning is conducted prior to the start of the fiscal year (FY). After city authorization, annual projects are included in the County's Action Plan, which is later approved by the Board of Supervisors. Projects included in this process are considered part of the County's annual activity planning, which is submitted and approved by HUD before the start of the Program Year.

Off-Cycle Activity Planning

Cities periodically engage in activity planning outside of the annual planning process. In these instances, actions to modify or significantly change a city's program are considered to be off-cycle changes and by definition are categorized as Substantial Amendments, if they involve the following types of program changes:

1. A new activity that was **not** included in the Action Plan (Proposed Project);
2. A funded activity described in the Action Plan, but cancelled during the Program Year (Cancelled Project); or
3. A project listed in the Action Plan is changed from one (1) eligibility activity to another (Revised Project).

II. Following the Citizen Participation Plan

In order to comply with HUD regulations as they relate to citizen participation (24 CFR §91.105(c)(2), Citizen Participation Plan; Local Governments), the public must be given notice as well as the opportunity to submit comments for both Annual Activity Planning and Off-Cycle Activity Planning. Acceptable methods of meeting the requirements of the Citizen Participation Plan include:

- Publication of the proposed action in a local newspaper whose primary circulation is within the area serving the community of affected citizens;
- Posting notices in public buildings within the jurisdiction of the administering agency, which include, but are not limited to, public libraries and city hall; or
- Holding public meetings within the city or area affected by the amendment to the approved Action Plan.

Requirements

Annual Activity Planning – Participating cities must allow its constituency to provide input on housing and community development needs by holding one (1) or more community meetings or conducting one (1) public hearing. The notification period for the public meeting must be a minimum of 14 calendar days and the public must have an opportunity to submit comments regarding the proposed activities for the upcoming fiscal year.

Off-Cycle Activity Planning, Substantial Amendments – Participating cities must ensure that the public is given a 30-day notice of a proposed off-cycle change (an activity that is new or cancelled or has a change in use (revised) from its previously identified eligible project), as well as an opportunity to submit comments on the changes prior to implementation.

****For CDBG funding under FY 2019-2020, FY 2020-2021, and the Coronavirus Aid, Relief, and Economic Security Act or CARES Act, participating cities may provide a 5-day notice/comment period of a proposed off-cycle change beginning April 8, 2020 as allowed under a HUD waiver. This includes any new activities proposed. A public hearing is not required but documentation relative to off-cycle activity planning applies.**

III. Content of the Public Notice

The notice must advise the public of the activity being proposed and how and where to submit comments, *as well as when the comment period ends*. The public notice must include all of the following elements:

Requirements

Annual Activity Planning

1. Identify that the action is a part of the Annual Activity Planning process.
2. Include the date of the upcoming public hearing/City Council meeting.
3. Include the Project Number.
4. Include the Project Title.
5. Identify the CDBG dollar amount designated for the activity.
6. Include a clear and concise description of the activity and beneficiaries.
7. Notification to the public of how and where to submit comments.
8. Include the date of when the public comment period ends.

Off-Cycle Activity Planning, Substantial Amendments

1. Identify that the action is a Substantial Amendment to the Action Plan.
2. Identify the type of amendment: Proposed Project, Cancelled Project, or Revised Project.
3. Include the Project Number.
4. Include the Project Title.
5. Identify the CDBG dollar amount of the activity.
6. Include a clear and concise description of the activity and beneficiaries.
7. For Revised Projects, the public notice must describe the information above for both the original and the new project, including reallocated funding amounts.
8. Notification to the public of how and where to submit comments about the proposed changes.
9. Include the date of when the public comment period ends.

IV. Proof of Compliance with Public Noticing Requirements

Each city will be responsible for sending a copy of the appropriate documentation to the GMU Contract Manager and also for maintaining this documentation in its files.

Documentation Requirements

Annual Activity Planning, (14-day notice period) and **Off-Cycle Activity Planning, Substantial Amendments**, (30-day notice period) ** require public noticing and documentation in one (1) of the two (2) following methods:

1. **Public Notice Posting:** If noticing the public through public advertising, cities must submit a copy of the official “*Proof of Publication*” and any comments received from the public regarding the project.
2. **Public Place Posting:** If noticing the public by posting in public buildings within the jurisdiction of the administering agency, cities must submit a copy of the notice posted with the city clerk attesting the day and location(s) of the posting, and any comments received from the public regarding the project.

V. Documented City Council Action

In order to document official action by the jurisdiction, the following is required to be submitted to the GMU Contract Manager for all Annual Activity Planning Projects. A clear description of the activity and the budget for each action/project must be identified.

Documentation Requirements

After Council action, participating cities are required to submit proof of City Council approval of its proposed activities by utilizing at least one (1) of the following:

- A copy of the adopting Resolution; or
- A copy of the approved signed City Council minutes.

VI. Summary of Documentation to be Submitted to the LACDA

Timely completion of the Exhibit A approval process is dependent upon receipt of the required documentation by the GMU Contract Manager. In summary, the required documentation for each Annual Activity Planning and Off-Cycle Activity Planning project is listed below:

Annual Activity Planning

Projects Proposed for the Action Plan

Required Documentation to LACDA

- 1a. Proof of public notice publication (14-day required); or
- 1b. Certification of public posting (if applicable); and
2. Any public comment(s) received; and
3. Certification of City Council action.

Off-Cycle Activity Planning

Proposed Project

Required Documentation to LACDA

- 1a. Proof of public notice publication (30-day required)**; or
- 1b. Certification of public posting

(if applicable); and

2. Any public comment(s) received.

Cancelled Project

1a. Proof of public notice publication (30-day required)**; or

1b. Certification of public posting (if applicable); and

2. Any public comment(s) received.

Revised Project

1a. Proof of public notice publication (30-day required)**; or

1b. Certification of public posting (if applicable); and

2. Any public comment(s) received.

Each participating city gives its constituency the opportunity to provide citizen input on housing and community development needs at a community meeting or public hearing by:

- Holding one or more community meetings or conducting one public hearing with a minimum 14-calendar day notification period.
- Soliciting citizen participation through an advertisement published in a local newspaper whose primary circulation is within the city.
- Soliciting citizen participation through notices posted in public buildings within the city at least 14 calendar days before the meeting date.

With the submission of its planning documents to the LACDA each year, participating cities are required to submit proof of city council approval of its proposed activities in one of the following ways:

- A copy of the adopting resolution or approved city council minutes.
- A letter from the city manager stating that the activities have received city council approval.
- A certification by the city clerk stating that the activities have received city council approval.

This documentation is kept on file at the LACDA and is available for public review.

****For CDBG funding under FY 2019-2020, FY 2020-2021, and the Coronavirus Aid, Relief, and Economic Security Act or CARES Act, participating cities may provide a 5-day notice/comment period of a proposed off-cycle change beginning April 8, 2020 as allowed under a HUD waiver. This includes any new activities proposed. A public hearing is not required but documentation relative to off-cycle activity planning applies.**

Countywide Public Hearing and Comment Period

After the publication of the draft Consolidated Plan, the Board of Supervisors convenes a public hearing to obtain views of County residents on projects proposed for funding in the ensuing program year. The Consolidated Plan, developed and disseminated by the LACDA, describes each proposed project in sufficient detail to enable citizens to determine how they may be affected. The LACDA shall

make copies of the draft Consolidated Plan available to the public for review at the office of the LACDA, at public libraries throughout the County and/or on the LACDA's Web site at www.lacda.org. Citizens will be notified of library locations and the time and location of the public hearing through the advertisement of a public notice in several newspapers and online at www.lacda.org at least 30 calendar days before the public hearing. Citizens will have 30 calendar days and up to the day of the public hearing to comment. Before the day of the public hearing, comments must be made in writing to the LACDA. If the LACDA Office or libraries are closed, please access the Consolidated Plan online at www.lacda.org.

On the day of the public hearing, comments may be submitted in writing or made orally to the Board of Supervisors at the public hearing. All public comments made both orally and in writing will be included in the final Consolidated Plan submitted to HUD.

Publishing the Final Consolidated Plan and the Assessment of Fair Housing

Following the public hearing, the Board of Supervisors authorizes the submission of the final Consolidated Plan or Assessment of Fair Housing to HUD. The LACDA shall make copies of the final Consolidated Plan and Assessment of Fair Housing available to the public for review at the LACDA, at several public libraries throughout the County, and/or on the LACDA Web site: www.lacda.org. Final copies shall also be made available to the participating cities.

III. AMENDMENTS AND ADMINISTRATIVE UPDATES

As specified in CDBG regulations [Title 24 of the Code of Federal Regulations, Part 91.505(a)], the LACDA shall amend the Consolidated Plan when it:

- Changes allocation priorities or funds distribution method;
- Revises policies, data, or goals; or
- Modifies the purpose, scope, location, beneficiaries, or funding of an activity.

Standard Amendments

Amendments that are not considered substantial shall be referred to as standard amendments. Standard amendments do not require citizen participation.

Substantial Amendments

The County of Los Angeles has determined that an amendment is substantial when:

1. A new activity that was **not** included in the Action Plan is proposed;
2. A funded activity described in the Action Plan is cancelled during the Program Year; or
3. A project listed in the Action Plan is changed from one (1) eligibility activity to another.

The LACDA will provide affected citizens a period of not less than 30 calendar days to make comments on a substantial amendment before it is implemented. **For CDBG funding under FY 2019-2020, FY 2020-2021, and the Coronavirus Aid, Relief, and Economic Security Act or CARES Act, the LACDA and participating cities may provide a 5-day notice of a proposed off-cycle change or substantial amendments beginning**

April 8, 2020 as allowed under a HUD waiver.

Acceptable methods of meeting the citizen participation requirements include:

- Publication of the availability of substantial change(s) in a local newspaper. The publication will provide a link to a LACDA web page which will provide more detailed information on the substantial amendment(s) and how to provide comments.
- Publication of any proposed change shall appear in a local newspaper whose primary circulation is within the area serving the community of affected citizens;
- Advertisement of the availability of the proposed change on the LACDA's website;
- Posting notices in public buildings within the jurisdiction of the administering agency, which include, but are not limited to, public libraries; or
- Holding meetings with citizens' advisory groups within the area affected by the substantial amendment.

Notification to the public shall advise citizens of how and where to submit comments on the proposed changes. A summary of these comments, and a summary of comments not accepted and the reasons, therefore, shall be attached to the substantial amendment that is submitted to HUD.

Disaster/Emergency events that may require expedited substantial amendments

It may be necessary to expedite substantial amendments to the Consolidated Plan in the event of a declared disaster or emergency. There are three types of disasters/emergency events that may necessitate an expedited substantial amendment including (1) Man-Made-disasters, (2) Natural disasters, and (3) Terrorism. Man-made disasters can include chemical spills, mass rioting, power outages, dam failure, plant explosions, etc. Natural disasters can include earthquakes, tsunamis, hurricanes, tornadoes, wild fires, flooding and public health issues such as wide-spread disease such as the recent coronavirus disease 2019 (COVID-19). Terrorism events include bomb threats, biochemical attacks like the spread of anthrax, or cyber-attacks like hacking, phishing, and virus distribution, etc.

These expedited substantial amendments may include funding new activities and/or the reprogramming of funds including canceling activities to meet needs resulting from a declared disaster or emergency. Therefore, the LACDA and/or participating cities may utilize CDBG, HOME, or ESG funds to meet these needs with a 5-day public comment period instead of a 30-day public comment period, which is otherwise required for substantial amendments. **For CDBG funding under FY 2019-2020, FY 2020-2021, and the Coronavirus Aid, Relief, and Economic Security Act or CARES Act, the LACDA and participating cities may provide a 5-day notice of a proposed off-cycle change beginning April 8, 2020 as allowed under a HUD waiver. Special ESG funding under the CARES Act referred to as ESG-CV to address the COVID-19 pandemic do not apply to citizen participation requirements that would otherwise apply to ESG funds; however, the County will publish how the ESG-CV funding has or will be used on the LACDA website at www.lacda.org.**

With respect to a declared disaster, the LACDA and/or participating cities may elect to use CDBG, HOME, or ESG funds to address needs not provided for by the Federal Emergency Management Agency (FEMA) and the Small Business Administration (SBA), or other disaster relief efforts. Funding for disaster relief may not duplicate other efforts undertaken by federal or local sources unless

allowed by the federal government. Potential eligible uses of funds are those that are included in this Citizen Participation Plan, the Consolidated Plan, or any other CDBG, HOME, or ESG eligible use. HUD may provide new guidance on eligible uses in which the County will comply with and may utilize as well.

All eligible CDBG activities, including those to address declared disasters or emergencies, must meet one of three national objectives which are: (1) Benefit to low- and moderate-income (LMI) persons; (2) Aid in the prevention of slums or blight; and (3) Meet a need having a particular urgency (referred to urgent need). The LACDA may carryout eligible CDBG activities to meet needs resulting from declared disasters or emergencies under any one of the three national objectives.

Responding to the COVID-19 Pandemic

The County may reprogram up to 50% of FY 2019-2020 funding and use up to 100% of FY 2020-2021 and future CDBG, HOME, and ESG funding to respond to the COVID-19 pandemic.

Funding for activities that have required in-person interaction including, but not limited to, housing rehabilitation, handyworker programs, and a variety of community services may be reprogrammed into activities that allow for social distancing such as grab and go or home-delivered meal services, online programming for a variety of clientele including, but not limited to, youth and senior citizens, and various business and microenterprise assistance identified below to respond to or recover from the effects of the COVID-19 pandemic. Please see below for other possible activities that may be funded. Any other possible eligible activity not included below may also be considered. The County will coordinate with the Department of Public Health before undertaking any activity to respond to the COVID-19 pandemic.

Potential eligible CDBG Activities that may be undertaken to support the COVID-19 response include, but are not limited to:

- Building and Improvements, including Public Facilities such as constructing testing and diagnosis, or treatment facility; rehabilitation of a community facility to establish an infectious disease treatment clinic; acquisition and rehabilitation, or construction of a group living facility that may be used to centralize patients undergoing treatment; rehabilitation of a commercial building or closed school building to establish an infectious disease treatment clinic, e.g. by replacing the HVAC system; acquisition and rehabilitation of a motel or hotel building to expand the capacity of hospitals to accommodate isolation of patients during recovery; or to make interim improvements to private properties to enable an individual patient to remain quarantined on a temporary basis;
- Assistance to Businesses, including Special Economic Development Activities such as providing grants or loans to support new business expansion to create jobs and manufacture medical supplies necessary to respond to infectious disease; avoid job loss caused by business closures related to social distancing by providing short-term working capital assistance to small businesses to enable retention of jobs held by low- and moderate-income persons; or to provide technical assistance, grants, loans, and other financial assistance to establish, stabilize, and expand microenterprises that provide medical, food delivery, cleaning, and other services to support home health and quarantine;

- Public Services such as job training to expand the pool of health care workers and technicians that are available to treat a disease within a community; provide testing, diagnosis or other services at a fixed or mobile location; increase the capacity and availability of targeted health services for infectious disease response within existing facilities; provide equipment, supplies, and materials necessary to carry out a public service; deliver meals on wheels to quarantined individuals that need to maintain social distancing due to medical vulnerabilities;
- Planning, Capacity Building, and Technical Assistance such as gathering data and developing non-project specific emergency infectious disease response plans; and
- Any other activity allowed under current CDBG regulations.

Urgent Need National Objective: To comply with the national objective of meeting community development needs having particular urgency, an activity will alleviate existing conditions that the LACDA or participating city certifies:

- Pose a serious and immediate threat to the health and welfare of the community;
- Are of recent origin or recently became urgent;
- The County and/or participating city is unable to finance the activity on its own; and,
- Other resources of funding are not available to carry out the activity.

A condition will generally be considered to be of recent origin if it is developed or became critical within 18 months preceding the LACDA's or participating city's certification.

*If HUD allows, such as through a waiver, activities under the urgent need national objective to be funded without the requirement that the County and/or a participating city is unable to finance the activity on its own and other resources of funding are not available to carry out the activity, the LACDA will only certify that the activity poses a serious and immediate threat to the health and welfare of the community and is of recent origin or recently became urgent.

Urgent need activities may include, but not limited to, the following:

- Clearance of debris;
- Provision of extra security patrols;
- Demolition, clearance and/or reconstruction of damaged property posing an immediate threat to public safety;
- Emergency reconstruction of essential water, sewer, electrical, medical, and telephone facilities;
- Emergency repair of streets and sidewalks; and,
- Providing a variety of relief services to individuals.

Administrative Updates

Changes to the Consolidated Plan that do not meet the criteria for standard or substantial amendments and do not require citizen participation are defined as administrative updates. Examples of administrative updates include grammatical or structural edits that do not substantially change the scope or meaning of activity; and changes in the coding or eligibility determination of a project that does not change the scope, location, or beneficiaries.

Submission of Amendments and Administrative Updates to HUD

The LACDA will submit Substantial Amendments to HUD on a quarterly basis. Standard Amendments and Administrative Updates are not formally noticed to the public, nor submitted to HUD. However, documentation describing general changes and/or identifying specific changes will be included in the annual Consolidated Annual Performance and Evaluation Report (CAPER), which is made available to the public.

IV. CONSOLIDATED ANNUAL PERFORMANCE AND EVALUATION REPORT

Current regulations require that the LACDA prepare and submit to HUD a Consolidated Annual Performance and Evaluation Report (CAPER) 90 days after the end of the program year. The CAPER allows HUD, local officials, and the public to evaluate the LACDA's overall performance, including whether activities and strategies are undertaken during the preceding year actually made an impact on the goals and needs identified in the five-year Consolidated Plan and Annual Action Plan.

Before submitting the CAPER to HUD, a notice is published in a newspaper of general circulation that serves the community of affected citizens. The notice will indicate that copies of the CAPER are available for public review for a period of not less than 15 calendar days. The document will be available for review at the offices of the LACDA, at several public libraries throughout the County, and/or on the LACDA's Web site: www.lacda.org. The notification will also advise citizens of how and where to submit comments on the CAPER. A summary of these comments, and a summary of comments not accepted and the reasons, therefore, shall be attached to the CAPER before it is submitted to HUD.

Availability of Final Caper

The final CAPER, which includes the most recent completed program year, will be available at the annual community meeting to inform affected citizens of specific activities that were undertaken in their communities.

V. TECHNICAL ASSISTANCE

Citizens are encouraged to recommend activities and types of activities that should be undertaken to meet housing and community development needs. Groups representative of extremely low-, low- and moderate-income persons desiring to develop project proposals may contact their respective administering agencies for technical assistance. Each respective administering agency will determine the level and type of technical assistance on a case-by-case basis.

VI. COMPLAINTS AND GRIEVANCES

Citizens, administering agencies, and other interested parties may submit complaints and grievances regarding the Consolidated Plan. Complaints should be in writing, specific in their subject matter, and include facts to support allegations. The following are considered to constitute complaints to which a response is due:

- The administering agency has purportedly violated a provision of this Citizen Participation Plan.
- The administering agency has purportedly violated a provision of the CDBG, ESG, or HOME program regulations.
- The administering agency, or any of its contractors, is purportedly engaging in questionable practices resulting in waste, fraud, or mismanagement of any program funds.

Residents may also present complaints and grievances orally or in writing at the community meeting and/or public hearing. All public comments, including complaints and grievances, made either orally or in writing within the 30-day public comment period, will be included in the final Consolidated Plan.

Timely Response

Upon receipt of a written complaint, the administering agency shall respond to the complainant within 15 calendar days and maintain a copy of all related correspondence, which will be subject to the LACDA review. If the matter cannot be satisfactorily resolved with the administering agency, the complainant may appeal to the LACDA by submitting copies of all pertinent correspondence and supporting documentation.

Within 15 calendar days of receiving the complaint, the LACDA shall discuss the matter with the administering agency and respond to the complainant in writing. A copy of the LACDA's response will be transmitted, concurrently, to the complainant and the administering agency. If due to unusual circumstances, the administering agency finds that it is unable to meet the prescribed time limit, the limit may be extended by written notice to the complainant. The agency's notice must include the reason for the extension and the date on which a response is expected to be generated, which may be based on the nature and complexity of the complaint.

Written complaints may be submitted to:

Los Angeles County Development Authority
700 W. Main Street
Alhambra, CA 91801
Attn: Community & Economic Development Division/Consolidated Plan

VII. ANTI-DISPLACEMENT & CITIZEN PARTICIPATION FOR OTHER PROGRAMS

The Citizen Participation Plan includes an Anti-Displacement and Relocation Plan that describes how the County will help persons who must be temporarily relocated or permanently displaced due to the use of CDBG, HOME, or ESG funds.

Background

The LACDA has adopted a policy that requires that a relocation assessment be completed in any circumstance in which it is anticipated even one person will be displaced as the result of a project. This policy exceeds all state and federal requirements. The purpose of this assessment is to ensure that the LACDA is advised early in the process of any major relocation problems that could be encountered in a project. The early recognition of problems gives the LACDA the opportunity to cancel a project if there are excessive displacements in a project.

In addition, the LACDA follows the Citizen Participation process required in Paragraph 6012 of the State of California Relocation Regulations and HUD relocation regulations found in HUD Transmittal 1378 Paragraph 2-2. A summary of that process follows:

“All persons who may be displaced, neighborhood groups, formed relocation committees or similar individuals or organizations shall be given an opportunity and will be encouraged fully and meaningfully to participate in reviewing the relocation plans and/or assessments.”

Displacement

Displacement occurs when a person moves as a direct result of the federally assisted acquisition, demolition, conversion, or rehabilitation activities because he or she is:

- Required to move;
- Not offered a decent, safe, sanitary, and affordable unit in the project; or
- Treated “unreasonably” as part of a permanent or temporary move.

The term displaced person means any person that moves from real property or moves his or her personal property from real property permanently as a direct result of one or more of the following activities:

- Acquisition of, or written notice of intent to acquire, or the initiation of negotiations to acquire, such real property, in whole or in part, for a project.
- Rehabilitation or demolition of such real property for a project.
- Rehabilitation, demolition, or acquisition (or written notice of intent) of all or a part of other real property on which the person conducts a business or farm operation, for a project.

A person may also be considered displaced if the necessary notices are not given or provided in a timely manner and the person moves for any reason.

Relocation of Displaced Persons

When a substantial number of persons will be displaced from their dwellings the LACDA shall encourage the residents and community organizations in the displacement area to form a relocation committee. The committee shall include, when applicable, residential owner-occupants, residential

tenants, business people, and members of existing organizations within the area. In lieu of initiating a new process of citizen participation, public entities, which have conducted or are conducting a citizen participation process as part of an existing development program, will be utilized and committees they formed may be substituted if the goals of Citizen Participation will be reached.

During the relocation planning process the LACDA will, at a minimum, guarantee the following:

1. Timely and full access to all documents relevant to the relocation program.
2. The provision of technical assistance necessary to interpret elements of the relocation plan and other pertinent materials.
3. The right to submit written or oral comments and objections, including the right to submit written comments on the relocation plan and to have these comments attached to the plan when it is forwarded to the local legislative body or the head of the state agency for approval.
4. Prompt, written response to any written objections or criticisms.
5. Assurances that families living in the project area will be given the opportunity, if feasible, to return to the project area after completion of project activities.

Change in Use of Real Property

The standards described in this section apply to real property within the administering agency's control, which is acquired or improved in whole or in part using CDBG funds in excess of \$25,000. These standards shall apply from the date CDBG funds are spent for the property until five years after closeout of the grant from which the assistance to the property was provided.

A recipient cannot change the use or planned use of any property (including beneficiaries of such use) from that for which the acquisition or improvement was made unless the recipient provides affected citizens with an opportunity to comment on, any change, and either:

1. The new use of such property qualifies as meeting one of the national objectives and is not a building for the general conduct of government; or
2. The recipient determines, after consultation with affected citizens, that it is appropriate to change the property's use to another use which does not meet a national objective and reimburses the CDBG program in the amount of the current fair market value of the property, less any portion of the value attributable to expenditures of non-CDBG funds for the acquisition of and improvements to the property.

Citizens will be informed of changes in the use or planned use of the property by means of a notice, which will be published in a newspaper of general circulation that serves the community of affected citizens. The notice will provide a description of the proposed change in use or planned use of the property and will also advise citizens of how and where to submit comments. Citizens will have an opportunity to comment on the proposed change in use or planned use of the property for a period of not less than 15 days.

Further details on changes in use requirements are set forth in the CDBG regulations [Title 24 of the Code of Federal Regulations, Part 570.505].

Citizen Participation for Environmental Reviews

In accordance with the provisions of 24 CFR Part 58, the LACDA has assumed from HUD the role of “Responsible Entity” for certain federally funded programs within the County of Los Angeles. As a “Responsible Entity,” the LACDA must assume the responsibility for environmental review, decision-making, and action that would otherwise apply to HUD under the National Environmental Policy Act of 1969 (NEPA) and other provisions of law that further the purposes of NEPA.

The LACDA maintains a written record of the environmental review undertaken for every project or program receiving LACDA administered federal funds. This environmental review record (ERR) is available for public inspection. Moreover, certain projects require publication of specific actions/findings, which include a description of the activity, its location, and identification of any measures required to mitigate potentially significant adverse effects. Public comment periods are included in the review process as prescribed by NEPA and 24 CFR Part 58.

Citizen Participation for Loan Guarantee Programs

In accordance with Section 108 regulations, Subpart M-Loan Guarantees [Title 24 of the Code of Federal Regulations, Part 570.704], the LACDA will comply with the following pre-submission and citizen participation requirements before submitting an application for Section 108 loan guarantee assistance to HUD. These requirements will also apply to the submission of an Economic Development Initiative (EDI), and Brownfield Economic Development Initiative (BEDI) application.

1. The LACDA will develop a proposed application to include the community development objectives and activities the LACDA proposes to pursue and carry out with the Section 108 funds. Each activity will be described in sufficient detail, including the provision under which the project is eligible, the national objective it meets, the amount of funds expected to be used, and the activity’s location to allow citizens to determine the degree to which they will be affected. The proposed application will also indicate which activities will generate program income and where citizens may obtain additional information about proposed activities. The proposed application will also include a description of the pledge of grants required under Title 24 of the Code of Federal Regulations, Part 570.705(b)(2).
2. The LACDA will also publish countywide public notice which will include its proposed application so as to give affected citizens an opportunity to examine the application’s contents and to make comments. The public notice will also advise citizens on how and where to submit comments as well as notify citizens of when and where a public hearing will be held at which they can provide further input on the proposed application. The public notice will be published at least 14 calendar days in advance of the public hearing.
3. A minimum of two (2) public hearings, held at different stages of the Consolidated Plan citizen participation process, will be held for the purpose to obtain the views of citizens and formulate or responding to proposals and questions. At least one of these hearings will be held before submission of a Section 108 application to HUD to obtain the views of citizens on community development and housing needs. At the hearing, each activity will be described in sufficient detail including the provision under which the project is eligible, the national objective to be met, the amount of funds expected to be used, and the activity’s location so that citizens can determine the degree to which they will be affected. Citizens will have up

- to 14 calendar days and including the day of the public hearing to comment.
4. Once the LACDA has published the public notice and held the public hearing, the LACDA will determine if the proposed application needs to be modified, based on comments and views received, before submitting the application to HUD. Upon completion, the final application will be made available to the public at the LACDA's office.

VIII. Citizen Participation Regarding Affirmatively Furthering Fair Housing and the Assessment of Fair Housing/ Analysis of Impediments

On July 16, 2015, the HUD published a final rule on Affirmatively Furthering Fair Housing (AFFH rule).¹ The AFFH rule establishes a process that certain recipients of HUD funding (referred to in the rule as "program participants") will use to help them meet their long-standing obligations to affirmatively further fair housing. The AFFH rule creates a standardized process for fair housing planning – referred to in the AFFH rule as an Assessment of Fair Housing (AFH).

Program participants who are covered by the AFFH rule include public housing agencies (PHAs) and jurisdictions that are required to submit a Consolidated Plan in connection with the receipt of CDBG, HOME, HOPWA, or ESG funding. The LACDA is therefore responsible for complying with the AFFH rule including developing an AFH. The following requirements apply to the next AFH which is due in 2023.

The LACDA continued to follow these citizen participation requirements with the development of the Analysis of Impediments (AI).

CITIZEN PARTICIPATION, CONSULTATION, AND COORDINATION

Community Participation, consultation, and coordination are required under the Affirmatively Further Fair Housing (AFFH) rule (24 CFR § 5.158). While they have different names, the requirements for community participation under the AFFH rule are the same as the "Citizen Participation" requirements in HUD Community Planning and Development Regulations but are two separate processes. Without meeting the community participation requirements, an Assessment of Fair Housing/Analysis of Impediments will be found to be substantially incomplete and not accepted by HUD.

The LACDA must ensure an AFH/AI is informed by meaningful community participation in the process of analyzing data; identifying fair housing issues and factors contributing to fair housing issues and developing fair housing goals within the Assessment of Fair Housing (AFH)/Analysis of Impediment (AI). In conducting the community participation process, the LACDA must conduct outreach to those populations who have historically experienced exclusion, including racial and ethnic minorities, limited English proficient (LEP) persons, and persons with disabilities. The LACDA may do joint meetings for the AFH/AI and the Consolidated Plan for more opportunities to comment on both documents.

Further, the LACDA must follow the policies and procedures described in 24 CFR part 91 (see 24 CFR §§ 91.100, 91.105, 91.110, 91.115, 91.235, and 91.401) and 24 CFR §§ 903.13, 903.15, 903.17, and 903.19, in the process of developing the AFH, obtaining community feedback, and addressing complaints.

¹ The AFFH rule is published at 80 Fed. Reg. 42,272 and codified at 24 CFR Part 5, along with conforming amendments to Parts 91, 570, and 903. The effective date of the AFFH rule is August 17, 2015

At a minimum, the LACDA will meet these requirements by:

1. The LACDA will hold five (5) community meetings for the general public and two (2) community meetings for public housing residents, including Resident Advisory Board members, to receive input on fair housing issues and contributing factors during the development stage of the AFH/AI. The LACDA will use various methods of outreach to ensure residents are notified of the meetings including:
 - Direct mailings;
 - Notifying residents through a public notice as well as newspaper advertisements 14 calendar days before the meetings; and
 - All notices and advertisements will be published in English, Spanish, Chinese, Korean, and Russian.
2. Consulting with agencies and organizations identified in consultation requirements at 24 CFR part 91 (see 24 CFR §§ 91.100, 91.110, and 91.235) and 24 CFR §§ 903.13, 903.15, 903.17, and 903.19.
3. Allowing the public to review the draft AFH/AI, including:
 - Providing 45 calendar days for the public to submit comments on the draft AFH;
 - Making the draft AFH/AI available on the LACDA website as well as making hard copies available at the LACDA and local libraries;
 - Notifying residents through a public notice as well as newspaper advertisements 14 calendar days before the meetings; and
 - All notices and advertisements will be published in English, Spanish, Chinese, Korean, and Russian.
4. Further, pursuant to 24 CFR § 5.154, the LACDA will report on their community participation processes and outcomes by providing the following in the Final AFH/AI:
 - A concise summary of the community participation process, public comments, and efforts made to broaden community participation in the development of the AFH/AI;
 - A summary of the comments, views, and recommendations received in writing, or orally at public hearings, during the community participation process; and
 - A summary of any comments, views, and recommendations not accepted by the program participant and the reasons for non-acceptance.
5. The AFH/AI goals and strategies will be included in the next Consolidated Plan and the next Five-Year Public Housing Agency Plan. With adequate noticing in compliance with this Citizen Participation Plan, citizens will be allowed to provide comment on the Public Housing goals and strategies within the Draft Public Housing Agency (PHA) 5-Year Agency Plan and PHA Annual Plan in which both provide a 45-day public comment period before they are finalized and those in the Draft Consolidated Plan and Annual Action Plan in which both provide a 30-day comment periods before they are finalized.
- LACDA AFH/AI Public Housing accomplishments will be reported in the Public Housing Agency Plan and the others relative to Community Planning & Development funds will be reported in the Consolidated Annual Performance and Evaluation Report (CAPER).

AFH/AI REVISIONS AND ADMINISTRATIVE UPDATES

The LACDA shall provide community residents with reasonable notice and an opportunity to comment on revisions to the AFH/AI, as specified under 24 CFR 5.164.

Significant Revisions

The County of Los Angeles has determined that an AFH/AI revision is necessary when:

- The material change in circumstances affects the information on which the AFH/AI is based;
- The analysis, fair housing contributing factors, or the priorities and goals of the AFH/AI no longer reflect actual circumstances.

The LACDA will provide affected citizens a period of not less than 30 calendar days to make comments on a significant AFH/AI revision before it is implemented. Acceptable methods of meeting the citizen participation requirements include:

- Publication of the availability of the substantial change(s) in a local newspaper or online at www.lacda.org. The publication will provide a link to a LACDA web page which will provide more detailed information on the significant revision(s) and how to provide comments.
- Publication of any proposed change shall appear in a local newspaper whose primary circulation is within the area serving the community of affected citizens;
- Advertisement of the availability of the proposed change on the LACDA's website;
- Posting notices in public buildings within the jurisdiction of the administering agency, which include, but are not limited to, public libraries; or
- Holding meetings with citizens' advisory groups within the area affected by the significant revision.

Notification to the public shall advise citizens of how and where to submit comments on the proposed changes. A summary of these comments, and a summary of comments not accepted and the reasons, therefore, shall be attached to the significant revision that is submitted to HUD.