



# City of Salinas

## Citizen Participation Plan

Amended: April 18, 2017

### 1. Encouragement of Citizen Participation

Since the City of Salinas (City) began receiving the Community Development Block Grant (CDBG) Program in 1975, HOME Investment Partnerships Program (HOME) in 1992, and Emergency Solutions Grant (ESG) in 1994, the City has incorporated full opportunities for citizens to participate in planning, development, and review of proposals for funding from these entitlement programs. As required by federal regulations from the United States Department of Housing and Urban Development (HUD), citizens must be provided with a reasonable opportunity to participate in an advisory role in planning, implementing and assessing those programs and proposals.

This <sup>1</sup>Citizen Participation Plan (CPP) sets forth policies and procedures to provide for and encourage participation by the residents of Salinas in the development of the City's Consolidated Plan (Con Plan) for HUD and subsequent Annual Action Plans (AAP), as well as the preparation of the Assessment of Fair Housing (AFH). The CPP also applies to any substantial amendments to the Con Plan and to the preparation of the Consolidated Annual Performance and Evaluation Report (CAPER), which evaluates progress toward the Con Plan objectives. The City submits a Con Plan to HUD every five (5) years and an AAP to HUD annually. These documents are due to HUD 45 days prior to the beginning of a new program year (typically falls around May 10). The CAPER is submitted to HUD and due within 90 days after the close of the program year, which ends on June 30. The first AFH is due 270 days prior to the beginning of a new Five-Year Con Plan (typically falls on October 4). Subsequent AFH's are due 195 days prior to the beginning of the next Five-Year Con Plan (typically falls on December 18).

Interested groups and individuals are encouraged to provide input into all aspects of the City's Con Plan and AFH activities – from assessing needs and setting priorities through performance evaluation. This CPP offers numerous opportunities for citizens to contribute information, ideas, and opinions about ways to provide decent housing, establishing and maintaining a suitable living environment, and expanding economic opportunities, particularly for low-and moderate-income persons.

In developing its Con Plan, AAP, substantial amendments, CAPER, AFH, and Section 108 applications to HUD, the City will take appropriate actions to encourage the participation of all of its citizens including:

- low-and moderate-income persons, particularly those living in areas where federal funds are proposed to be used;
- residents of predominantly low-and moderate-income neighborhoods;
- residents of racially and ethnically concentrated areas of poverty (R/ECAP);
- minorities;
- people with Limited English Proficiency (LED);
- people with disabilities;

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<sup>1</sup> CPP regulations may be viewed online at:

<http://www.ecfr.gov/cgi-bin/text-idx?c=ecfr&SID=50baf95c9e5da4e8bf465e2c9011035a&rqn=div8&view=text&node=24:1.1.1.1.40.2.87.2&idno=24>

- residents of public and other assisted housing developments; and
- local and regional institutions, the regional Continuum of Care (COC) coalition (known as “Coalition of Homeless Services Providers”) and other organizations (including businesses, developers, nonprofit organizations, philanthropic organizations, and community-based and faith-based organizations).

The City is committed to keeping all interested groups and individuals informed of each phase of the Con Plan process, and of activities being proposed or undertaken under HUD entitlement programs. Opportunities to comment on or participate in planning community development and affordable housing activities and projects will be publicized and disseminated as widely as possible in Salinas.

## **2. Public Hearings**

The City will conduct at least two public hearings each year to obtain citizens’ views and to respond to proposals and questions. The hearings are usually held by the City Council. Hearings will take place at different stages of the Con Plan planning process and together address:

- housing and community development needs;
- the proposed use of program funds, and
- program performance during the past year.

At least one hearing will be held in the fall (usually in September), to solicit feedback on the City’s housing and community development needs and to review program performance during the past year. In addition, at least one hearing will be held in the spring (usually in May) to solicit comments on the draft Con Plan and/or AAP, which include the proposed use of CDBG, ESG and HOME funds. The information provided to the public on or before the public hearing will include:

- the amount of assistance the local government expects to receive (including grant funds and program income);
- the range of activities that may be undertaken;
- the estimated amount of funding that will benefit persons of low-and moderate-incomes; and
- the City’s plan to minimize displacement of persons and to assist any person displaced, specifying the types and levels of assistance the City will make available (or require others to make available) to persons displaced, even if no displacement is expected to occur.

This information will be presented at the public hearing and is contained in the text of the Con Plan and AAP under review.

## **3. Public Hearing Notices and Outreach**

Information about the time, location, and subject of each hearing will be provided to citizens at least two weeks in advance by:

- publication of a notice in two local newspapers (in English in *The Californian* and in Spanish in *El Sol*);
- email distribution lists;
- posting on the City’s website, <http://www.cityofsalinas.org/>;

The City also subscribes to the California Relay Service to accommodate TDD (telecommunication devices for the deaf) users; published public notices provide a TDD number. The City also provides notice to Central Coast Center for Independent Living, Deaf & Hard of Hearing Service Center, and Blind and Visually Impaired Center. These local agencies serve groups that may need notice in a different format.

Targeted outreach developed specifically for informing low and moderate-income persons, particularly those residing in the Alisal Homeownership and Neighborhood Revitalization Strategy Area (AHNRSA), minorities, residents of public and other affordable housing, and persons with disabilities will take place via distribution of notices to providers of services to these populations, including the Housing Authority of the County of Monterey and non-profit affordable housing developers in Salinas. Outreach to Continuum of Care/CHSP partners, local businesses, Salinas-based developers, nonprofit organizations, philanthropic organizations, and other community-based and faith-based organizations, will take place via notices sent to these organizations via email and/or regular mail.

Every effort will be made to ensure that public hearings are inclusive. Hearings will be held at convenient times and locations, preferably in the late afternoon/early evening and in places where people most affected by proposed activities can attend. The City will utilize facilities, which are accessible to persons with mobility impairments. Published notices will include information that:

*“Disability-related modification or accommodation, including auxiliary aids or services, may be requested by any person with a disability who requires a modification or accommodation in order to participate in the meeting. Requests should be referred to the City Clerk’s office at 200 Lincoln Avenue, Salinas, (831) 758-7381, as soon as possible but no later than 5 p.m. of the last business day prior to the meeting. Hearing impaired or TTY/TDD text telephone users may contact the City by dialing 711 for the California Relay Service (CRS) or by telephoning any other service providers’ CRS telephone number.”*

Spanish translation is provided at all public meetings and hearings concerning HUD programs.

#### **4. Publication of the Proposed Consolidated Plan and Annual Action Plans**

The City will publish proposed Con Plan and AAP in a manner that affords citizens, public agencies, and other interested parties a reasonable opportunity to examine its contents and submit comments. The proposed Con Plan (or “public comment draft”) shall include:

- the amount of assistance the City expects to receive (including grant funds and program income);
- the range of activities that may be undertaken, including the estimated amount that will benefit persons of low-and moderate-incomes, and
- summary of the proposed Con Plan and/or AAP will be published in one or more newspapers of general circulation at the beginning of the required public comment period. The summary will describe the contents and purpose of the plan (including a summary of specific objectives), and include a list of locations where copies of the entire proposed Con Plan and/or AAP may be obtained or examined.

The following are among the locations where copies of the public comment draft will be made available for inspection:

- John Steinbeck Library, 350 Lincoln Avenue, Salinas;
- Cesar Chavez Library, 615 Williams Road, Salinas;
- El Gabilan Library, 1400 North Main Street, Salinas;
- Housing Division, Community & Economic Development Department, 65 W. Alisal Street, 2<sup>nd</sup> Floor, Salinas;
- City Clerk’s Office, City Hall, 200 Lincoln Avenue, Salinas, and
- On-line at the City of Salinas website: <http://www.cityofsalinas.org/>.

Copies of the proposed Con Plan and/or AAP can be obtained by contacting the Housing Division of the Community Development Department at (831) 758-7334 or [housingwebmail@ci.salinas.ca.us](mailto:housingwebmail@ci.salinas.ca.us).

## **5. Limited English Proficiency (LEP) Residents**

Residents who, as a result of national origin, do not speak English as their primary language and who have limited ability to speak, read, write or understand English may be entitled to language assistance related to the planning, programming and implementation of federal CDBG, HOME and/or ESG funding by the City. In providing such language assistance, the City will be taking affirmative steps in complying with Title VI of the Civil Rights Act of 1964, which is the federal law which protects individuals from discrimination.

The two primary goals of this policy are to provide specific services to eligible individuals in need of language assistance and to increase participation of residents from all races and national origins comparable to their representation within this community. The threshold for eligibility and access to language services shall be 5% of the population as determined in the most current federal Census. For Salinas, since the 2010 Census identified 75.0% of the resident population as either Hispanic or Latino, special considerations (e.g. publishing the APP in Spanish or English) will be directed to this group in the implementation of the CPP.

The provision of the language assistance shall be implemented by the Community Development Department.

## **6. Public Comments on the Proposed Consolidated Plan and/or Annual Action Plan**

The City will receive comments from citizens on its proposed Con Plan and/or AAP for a period not less than thirty (30) days prior to submission of the Plan(s) to HUD. All comments or views of citizens received in writing or orally at public hearings will be considered in preparing the final Plan(s). The comments, or a summary of these comments, therefore shall be attached to the final Plan(s). Oral comments outside of the public hearing will not be considered, unless they are also provided directly to staff via email, letter, or other legible written form at the address provided in Section 4, above. The final version of the Con Plan and/or AAP as submitted to HUD will be posted on the City's webpage.

## **7. Contingencies and Amendments**

HUD regulations at 24 CFR Part 91.505 guide amendments to the Con Plan and AAP. City housing staff and the City Council will select alternate non-housing projects which can be implemented if projects approved by the City Council are rejected by HUD or if approved activities subsequently are determined to be ineligible, illegal, or for other reasons cannot be implemented.

When a substantial change is proposed for a project, City staff will prepare the amendment. Prior to City Council action on a substantial amendment to the Plan, a notice of the proposed change will be published in a newspaper of general circulation 30 days prior to implementation.

When a substantial amendment is proposed, the City Council will allow public comment before acting on the substantial amendment to an approved Con Plan. This public comment opportunity will take the place of a formal public hearing. A summary of citizen comments and why the comments were accepted or rejected will be attached to the amendment.

A substantial amendment is defined as:

- For larger projects, over \$200,000, an increase of 25 percent or more in project funding.

Changes that are less than \$50,000 are not considered substantial.

- An increase of 25 percent or more in project beneficiaries (i.e. income groups, limited clientele groups, residents of a targeted area) or a change in purpose, scope or location which would change the project beneficiaries by more than 25 percent or
- A determination by the Community Development Director, that the change is substantial even though it falls below the standards in Section 1 and 2 above.
- For ESG components, as long as the maximum 60% threshold for Street Outreach and Emergency Shelter is not exceeded, funding can be moved within the other components to meet expenditure requirements without a substantial amendment.

HOME funded project selection decisions that meet the approved criteria of an established loan or grant program will not be considered substantial amendments. The City, in consultation with the Housing/CDBG Subcommittee will select alternate housing projects during each funding cycle which can be implemented if an approved project does not achieve milestones set at the time of funding, the project is discontinued or postponed, or for whatever other reason an approved project is unable to perform in a timely manner.

#### **8. Public Notice of and Public Comment on Substantial Amendment.**

Once drafted, the City shall make the substantial amendment public and submit it to the City Council for its review, comment, and recommendation. Notice and opportunity to comment will be given to citizens through public notices in local newspapers and other appropriate means, such as the targeted distribution lists described above in Section 3. A public comment period of not less than thirty (30) days will be provided prior to implementing any substantial amendments to the Con Plan and/or Annual Action Plan. Comments received, or a summary of comments, therefore shall be attached to the substantial amendment, which will be available to the public and submitted to HUD.

#### **9. Preparation of the Consolidated Annual Performance and Evaluation Report (CAPER)**

Performance reports on programs covered by the Con Plan/AAP are to be prepared by the City for annual submission to HUD by September 30. The City shall provide a preliminary draft of the CAPER and publish a notice announcing that the public shall have no less than fifteen (15) days to review and comment on the document. The draft CAPER shall be placed on view at the same public places where the Consolidated Plan/AAP shall be made available, and posted to the City's website.

All public comments received orally at public hearings or submitted in writing regarding the CAPER will be considered and the comments, or a summary of these comments, shall be attached to the final document. The City shall encourage members of the public to review the performance detailed in the CAPER during the Fall public hearing.

#### **10. Preparation of the Assessment of Fair Housing**

Federal programs such as CDBG, HOME and ESG have regulatory requirements to affirmatively further fair housing based upon HUD's obligation under Section 808 of the Fair Housing Act. The AFH planning process helps communities analyze challenges to fair housing choice and establish goals and priorities to address the fair housing barriers in the community. The AFH helps jurisdictions identify and assess four fair housing issues: patterns of integration and segregation; racially or ethnically concentrated areas of poverty; disparities in access to opportunity; and disproportionate housing needs.

##### **Consultation**

The City will encourage participation by low-income residents, the Continuum of Care, local and regional institutions, and other organizations in developing and implementing the AFH. During the development



of the AFH, at the minimum, the City will consult the following services/agencies to solicit their input on fair housing issues in the City:

- Fair Housing Organizations;
- Housing Authority of the County of Monterey and its Resident Advisory Board;
- Tenant organizations, including resident management corporations, resident councils, assisted housing resident organizations and advocates;
- Advocacy groups and community-based organizations serving special needs households and classes of persons protected under state and federal fair housing laws;
- Affordable housing developers and housing service providers;
- Banks and other financial institutions, and housing professionals (realtors, property management companies);
- Faith-based organizations;
- Public and private agencies that provide social services, including those focusing on services to low-income populations, children, elderly persons, persons with disabilities, and homeless persons;
- Adjacent governments and neighboring jurisdictions regarding priority non-housing community development needs and local government agencies with metropolitan-wide planning responsibilities regarding problems and solutions that go beyond a single jurisdiction (e.g. transportation, employment);
- Organizations relevant to the opportunity analysis, for example local school district leadership or parent groups or environmental justice groups;
- Philanthropic organizations; and
- States and local universities.

### **Public Review of Draft AFH**

The City will make HUD-provided AFH data and any other supplemental information to be incorporated into its AFH available to residents, public agencies, and other interested parties.

The draft AFH will be made available for public review for 30 days. Written comments will be accepted during the 30-day comment period. A summary of written comments and the City's responses must be attached to the AFH. A 30-day comment review period will be noticed and the draft AFH made available at locations detailed in Section 4 of this Plan.

### **Public Hearings**

The City will conduct at least one public hearing during the development stage of the draft AFH to receive input on fair housing issues. The City may also conduct a public hearing to accept comments on the draft AFH prior to adoption.

#### **11. Access to Records**

All public records, as defined by the State Public Disclosure Act, will be available for review at the City Clerk's office or at the Community Development Department Housing Division during normal business hours. Requests for records will be handled in accordance with the City of Salinas' policy on review of public records. A reasonable fee may be charged for copying records for citizens.

#### **12. Technical Assistance**

The City shall make available, upon request, technical assistance to groups representing persons of low-and moderate-income (and other special needs) that request such assistance in developing proposals for funding assistance under any of the programs covered by the Plans. The City shall also hold at least one workshop for community agencies applying for City funding on or near the time of

issuance of a Request for Proposals to explain issues related to various funding sources available, eligible activities, the application process itself, and to answer any questions applicants may have.

### **13. Citizen Complaints**

The City of Salinas shall accept written complaints and provide a substantive written response to any written citizen complaint within a reasonable period of time, not to exceed fifteen (15) working days, when the complaint concerns the Con Plan, AAP, amendments thereto, AFH and performance reports.

Complaints, comments and questions should be directed to:

Planning Manager, Housing Division  
Community and Economic Development Department  
City of Salinas  
65 W. Alisal Street, 2<sup>nd</sup> Floor  
Salinas, CA 93901  
housingwebmail@ci.salinas.ca.us  
(831)758-7334

### **14. CDBG/Housing Subcommittee**

The Mayor appoints members to the CDBG/Housing Subcommittee. The CDBG/Housing Subcommittee is the advisory board that recommends CDBG, ESG and HOME allocations along with the Con Plan, AAP, and AFH to the City Council.

### **15. Effective Date and Amendments**

This amended CPP will supersede the prior CPP, and become effective on April 18, 2017, and will remain in effect as long as Con Plan activities are ongoing or until superseded by a new amended CPP. Citizens will be given notice and an opportunity to comment on any substantial amendments to the CPP. This CPP will be made available to the public at the locations detailed in Section 4 of this Plan. Persons with disabilities that need special accommodations to review this Plan may make a request to CED or NCS, and reasonable accommodations will be made to provide the document in a form that is accessible to the person making the request.