



# **Citizen Participation Plan**

*U.S. Department of Housing and Urban Development (HUD)  
Community Planning and Development Grant Programs*

*Draft – September 2019*

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## **Draft Citizen Participation Plan** **City of Corona, California**

As required by the U.S. Department of Housing and Urban Development (HUD) regulations found at 24 CFR 91.105, this Citizen Participation Plan sets forth the City of Corona's (City) policies and procedures for providing citizens and other interested parties with opportunities to participate in an advisory role in the planning, implementation, and evaluation of the Community Development Block Grant (CDBG) and HOME Investment Partnerships (HOME) programs. The purpose of the CDBG program is the provision of decent housing, a suitable living environment, and expanded economic opportunities for low- and moderate-income residents earning less than 80 percent of the Area Median Income (AMI), or in predominantly low- and moderate-income neighborhoods where at least 51 percent of the households are low and moderate-income households. The purpose of the HOME program is to produce new and preserve existing affordable housing opportunities.

As a recipient of CDBG and HOME funds, the City is required to produce the following Consolidated Plan Documents:

1. Citizen Participation Plan – the City's policies and procedures for community participation in the planning, implementation, and evaluation of the CDBG program.
2. Analysis of Impediments to Fair Housing Choice or Assessment of Fair Housing (AI or AFH) – a five-year plan completed by the City individually or as part of a local consortium of other HUD grantees pursuant to HUD guidance for the evaluation of local housing conditions, economics, policies and practices and the extent to which these factors impact the range of housing choices and opportunities available to all residents in an environment free from discrimination.
3. Consolidated Plan – a five-year plan that documents the City's housing and community development needs, outlines strategies to address those needs and identifies proposed program accomplishments.
4. Action Plan – an annual plan that describes specific CDBG projects and activities that will be undertaken over the course of the program year, which runs from July 1 to June 30.
5. Consolidated Annual Performance and Evaluation Report (CAPER) – an annual report that evaluates the City's accomplishments and use of CDBG funds.

The HUD requirements for citizen participation do not restrict the responsibility or authority of the City for the development and execution of the Consolidated Plan Documents and programs, but rather facilitate citizen access to, and engagement with the CDBG and HOME programs.

In accordance with the regulations, the minimum annual number of public hearings at which citizens may express their views concerning the Consolidated Plan Documents shall be two (2) public hearings. These public hearings shall occur at two (2) different points during the program year. Additional public hearings may be held in the development of the Consolidated Plan for 2020-2024 and in the event of Substantial Amendments to the Citizen Participation Plan,

Consolidated Plan, AFH or AI, or Action Plan become necessary as described later in this document. The City, at its discretion, may conduct additional outreach, public meetings or public hearings as necessary to foster citizen access and engagement.

#### **A. Encouragement of Citizen Participation**

The City of Corona provides for and encourages citizens to participate in the development of the Citizen Participation Plan, Consolidated Plan, AFH or AI, Action Plan, and CAPER. The City encourages participation by low- and moderate-income persons, particularly those living in slum and blighted areas and in areas where CDBG funds are proposed to be used, and by residents of predominantly low- and moderate-income neighborhoods<sup>1</sup>. The City will also take appropriate actions to encourage the participation of all its citizens, including minorities and non-English speaking persons (in accordance with the City's Limited English Proficiency (LEP) Plan), as well as persons with disabilities.

The City will make a concerted effort to notify and encourage the participation of citizens, local and regional institutions, the local Continuum of Care organization addressing homelessness, and public and private organizations including businesses, developers, nonprofit organizations, philanthropic organizations, community-based and faith-based organizations, broadband internet service providers, organizations engaged in narrowing the digital divide, agencies whose primary responsibilities include the management of flood prone areas, public land or water resources, emergency management agencies, state and local health service providers, social service providers, fair housing organizations, state and local governments, public housing agencies, affordable housing developers, businesses, community and faith based organizations, and other stakeholders in the amendment of the Citizen Participation Plan or the development of the AI or AFH, Consolidated Plan, Action Plans through mailings (including electronic mailings), online postings and public notices in the newspaper.

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

CDBG Consultant  
Community Development Department  
400 South Vicentia Avenue  
Corona, CA 92882  
Phone: (951) 817-5715

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<sup>1</sup> Predominately low- and moderate-income neighborhoods are defined as those in which 51% of the residents have incomes at or below 80% of area median income, as determined with HUD-supplied data.

## **B. Citizen Participation Plan**

The following describes the process and procedures related to the development of the Citizen Participation Plan.

### **1. Plan Development**

The City's Citizen Participation Plan development procedures are outlined below.

#### **a. Plan Considerations**

As a part of the Citizen Participation Plan process, and prior to the adoption of the Consolidated Plan, the City will make available the information required by HUD. This information will be made available to citizens, public agencies, and other interested parties. Section G describes the process for making the Plans available, as well as civic engagement efforts.

#### **b. Plan Review and Comment**

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

The Citizen Participation Plan will encourage comment and participation by minority and non-English speakers. Publication of the plan will be advertised in non-English languages as specified in the City's LEP Plan and translation services will be available upon request.

Written comments will be accepted by the CDBG Consultant or designee during the public review period. A summary of all written comments and those received during the public hearing as well as the City's responses will be attached to the Citizen Participation Plan prior to submission to HUD.

#### **c. Public Hearing**

The City shall conduct a public hearing to accept public comments on the draft Citizen Participation Plan. The City Council shall approve or reject the Citizen Participation Plan. Section G describes the process for publishing notices and conducting public hearings.

#### **d. Submittal to HUD**

The Citizen Participation Plan shall be approved as a stand-alone document and submitted to HUD. Documents related to the public participation process, including

copies of public notices and a summary of all public comments received, including those comments not accepted and the reasons why, shall be attached to the Action Plan, as applicable.

## **2. Citizen Participation Plan Amendment**

The City shall amend the Citizen Participation Plan using the following procedures, as needed:

### **a. Amendment Considerations**

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

### **b. Public Review and Comment**

Amendments to the Citizen Participation Plan shall be made available for public review for a 30-day period. A public hearing shall be conducted so that citizens may express their views. Written comments will be accepted by the CDBG Consultant or designee during the public review period. A summary of all written comments and those received during the public hearing as well as the City's responses will be attached to the amended Citizen Participation Plan prior to submission to HUD.

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

### **c. Public Hearing**

The City shall conduct a public hearing to accept public comments on the draft Substantial Amendment to the Citizen Participation Plan. The City Council shall approve or reject the Substantial Amendment to the Citizen Participation Plan. Section G describes the process for publishing notices and conducting public hearings.

### **d. Submittal to HUD**

The Amended Citizen Participation Plan shall be submitted to HUD. Documents related to the public participation process, including copies of public notices and a summary of

all public comments received, including those comments not accepted and the reasons why, shall be attached to the Amended Citizen Participation Plan, as applicable.

### **C. Five-Year Consolidated Plan**

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

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

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

Additionally, the City must attest to its compliance with the acquisition and relocation requirements of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended, and implementing regulations at 49 CFR 24, as effectuated by the City's adopted Residential Anti-Displacement and Relocation Assistance Plan, as required under Section 104(d) of the Housing and Community Development Act of 1974, as amended. Persons displaced as a result of HUD-assisted activities, whether implemented by the City or by others, shall receive relocation benefits as required under Federal Law.

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

#### **1. Plan Development**

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

##### **a. Plan Considerations**

The City will make a concerted effort to notify and encourage the participation of citizens, local and regional institutions, the local Continuum of Care organization addressing homelessness, and public and private organizations including businesses, developers, nonprofit organizations, philanthropic organizations, community-based and faith-based organizations, broadband internet service providers, organizations engaged in narrowing the digital divide, agencies whose primary responsibilities include the management of flood prone areas, public land or water resources, emergency

management agencies, state and local health service providers, social service providers, fair housing organizations, state and local governments, public housing agencies, affordable housing developers, businesses, community and faith based organizations, and other stakeholders in the development of the Consolidated Plan through mailings (including electronic mailings), online postings and public notices in the newspaper.

When preparing the of the Consolidated Plan describing the City's homeless strategy and the resources available to address the needs of homeless persons (particularly chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth) and persons at risk of homelessness, the jurisdiction must consult with:

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

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

When preparing the description of priority non-housing community development needs, the City must notify adjacent units of general local government, to the extent practicable. The non-housing community development plan must be submitted to the state and to the county. The City also will consult with adjacent units of general local government, including local government agencies with metropolitan-wide planning responsibilities, particularly for problems and solutions that go beyond the City's jurisdiction.

The City will consult with Riverside County Housing Authority the local public housing agency (PHA) concerning consideration of public housing needs and planned programs and activities. If the City becomes eligible to receive Emergency Solutions Grants (ESG), the City will consult with the Continuum of Care in determining how to allocate its ESG grant for eligible activities; in developing the performance standards for, and evaluating the outcomes of, projects and activities assisted by ESG funds; and in developing



funding, policies, and procedures for the operation and administration of the Homeless Management Information System (HMIS).

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

b. Plan Review and Comment

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

The plan will encourage comment and participation by minority and non-English speakers (in accordance with the LEP Plan). Publication of the plan will be advertised in necessary non-English languages (in accordance with the LEP Plan) and translation services will be available upon request.

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

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

c. Public Hearing

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

d. Submittal to HUD

The Consolidated Plan shall be submitted to HUD at least 45 days before the first program year begins, unless otherwise directed by HUD. Documents related to the

public participation process, including copies of public notices and a summary of all public comments received, including those comments not accepted and the reasons why, shall be attached to the Consolidated Plan, as applicable.

## **2. Consolidated Plan Amendment**

The City's procedures for completing substantial and minor amendments to the Consolidated Plan include:

### **a. Amendment Considerations**

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

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

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

### **b. Public Review and Comment**

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

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

### **c. Public Hearing**

The City shall conduct a public hearing to accept public comments on the draft Substantial Amendment to the Consolidated Plan. The City Council shall approve or reject the Substantial Amendment to the Consolidated Plan. Section G describes the process for publishing notices and conducting public hearings.

d. Submittal to HUD

The Amended Consolidated Plan shall be submitted to HUD in accordance with HUD policy. Documents related to the public participation process, including copies of public notices and a summary of all public comments received, including those comments not accepted and the reasons why, shall be attached to Amended Consolidated Plan, as applicable.

## **D. Action Plan**

The following paragraphs describe citizen participation opportunities in the development of the Action Plan.

### **1. Plan Development**

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

a. Plan Considerations

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

- Health Services Providers
- Social Services for: Children, Elderly, Disabled, Homeless, Persons With AIDS
- State and Local Health Agencies
- Adjacent Local Governments
- Economic Development Interests
- Riverside County Housing Authority

b. Plan Review and Comment

The draft Action Plan incorporating the City's proposed uses of CDBG and HOME funds shall be made available for public review for a 30-day period.

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

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

c. Public Hearing

The City shall conduct a public hearing to accept public comments on the draft Action Plan. The City Council shall approve or reject the Action Plan. Section G describes the process for publishing notices and conducting public hearings.

d. Submittal to HUD

The Action Plan shall be submitted to HUD at least 45 days before the program year begins, unless otherwise directed by HUD. Documents related to the public participation process, including copies of public notices and a summary of all public comments received, including those comments not accepted and the reasons why, shall be attached to Action Plan, as applicable.

## **2. Action Plan Amendment**

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

a. Amendment Considerations

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

- Addition of a new project not previously identified in the Action Plan, without regard to funding source;
- Cancellation of an existing project identified in the Action Plan, without regard to funding source; or
- Changes in the use of CDBG funds from one eligible activity to another eligible activity meeting the following thresholds:
  - A net increase or decrease greater than 50% of the activity allocation if the allocation is \$50,000 or more as listed in a published Action Plan, or as amended;
  - A net increase or decrease greater than 100% of the activity allocation if the allocation is less than \$50,000 as listed in a published Action Plan or amended; or
  - A net increase or decrease in an activity allocation greater than \$300,000.

However, adding CDBG or HOME Program Income from affordable housing loan payoffs to existing affordable housing projects and activities in an Action Plan shall not be considered a Substantial Amendment.

The City may make minor changes to the Action Plan, as needed, so long as the changes do not constitute a Substantial Amendment as described above. Such minor changes to the Action Plan will not require public review and comment and shall not require a public hearing.

b. Public Review and Comment

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

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

c. Public Hearing

The City shall conduct a public hearing to accept public comments on Substantial Amendments to the Action Plan. The City Council shall approve or reject the Substantial Amendment. Section G describes the process for publishing notices and conducting public hearings.

d. Submittal to HUD

Substantial Amendments shall be submitted to HUD in accordance with HUD policy. Documents related to the public participation process, including copies of public notices and a summary of all public comments received, including those comments not accepted and the reasons why, shall be attached to the Substantial Amendment, as applicable.

## **E. Consolidated Annual Performance and Evaluation Report (CAPER)**

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

## **1. CAPER Development**

The City shall follow the following procedure to prepare and submit of the CAPER:

### **a. Plan Considerations**

Staff will evaluate and report the accomplishments of the previous program year for the CDBG and HOME programs, and will summarize annual expenditures.

### **b. Plan Review and Comment**

The City encourages citizen participation in the development of the CAPER. The draft CAPER shall be made available for public review for a 15-day period. Written comments will be accepted during public review period by the CDBG Consultant or designee. A summary of the comments and the City's responses to the comments will be attached to the draft CAPER. Copies will be made available following the process described in Section G of this document.

### **c. Submittal to HUD**

Upon completion of the report, submit the CAPER to HUD. Documents related to the public participation process, including copies of public notices and a summary of all public comments received, shall be attached to the CAPER. The CAPER shall be submitted to HUD within 90 days of the end of the program year pursuant to regulations.

## **F. Assessment of Fair Housing (AFH) or Analysis of Impediments (AI)**

The Assessment of Fair Housing (AFH) or Analysis of Impediments to Fair Housing Choice (AI) is a five-year plan completed by the City individually or as part of a local consortium of other HUD grantees pursuant to HUD guidance for the evaluation of local housing conditions, economics, policies and practices and the extent to which these factors impact the range of housing choices and opportunities available to all residents in an environment free from discrimination. As of April 2019, HUD has suspended the AFH planning framework. HUD currently requires the submission of an AI for grantees submitting Consolidated Plans for FY2019. The following describes the process and procedures related to the development of the AFH or AI.

### **1. Plan Development**

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

### **a. Plan Considerations**

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

The City will make a concerted effort to notify and encourage the participation of citizens, local and regional institutions, the local Continuum of Care organization addressing homelessness, and public and private organizations including businesses, developers, nonprofit organizations, philanthropic organizations, community-based and faith-based organizations, broadband internet service providers, organizations engaged in narrowing the digital divide, agencies whose primary responsibilities include the management of flood prone areas, public land or water resources, emergency management agencies, state and local health service providers, social service providers, fair housing organizations, state and local governments, public housing agencies, affordable housing developers, businesses, community and faith based organizations, and other stakeholders in the development of the AI or AFH through mailings (including electronic mailings), online postings and public notices in the newspaper, as well as telephone or personal interviews, mail surveys, and consultation workshops.

b. Plan Review and Comment

The City encourages residents and stakeholders to participate in the development of the AFH or AI. The AFH or AI shall be made available for public review for a 30-day period. Written comments will be accepted during public review period by the CDBG Consultant or designee. A summary of the comments and the City's responses to the comments will be attached to the AFH or AI Amendment. Copies will be made available following the process described in Section G of this document.

c. Public Hearing

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

d. Submittal to HUD

The final AFH or AI shall be submitted to HUD in accordance with HUD regulations or policy. Documents related to the public participation process, including copies of public notices and a summary of all public comments received, including those comments not accepted and the reasons why, shall be included with the AFH or AI submission, as applicable.

## **2. AFH or AI Amendment**

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

### **a. Amendment Considerations**

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

The City shall substantially amend the AFH if a “substantial change” is proposed by City staff or the City Council or as otherwise required by HUD. An AFH that was previously accepted by HUD must be revised and submitted to HUD for review if a material change occurs. A material change is a change in circumstances in the jurisdiction of a program participant that affects the information on which the AFH is based to the extent that the analysis, the fair housing contributing factors, or the priorities and goals of the AFH no longer reflect actual circumstances. Examples include Presidentially declared disasters, under title IV of the Robert T. Stafford Disaster Relief and Emergency Assistance Act (42 U.S.C. 5121 et seq.), in the program participant's area that are of such a nature as to significantly impact the steps a program participant may need to take to affirmatively further fair housing; significant demographic changes; new significant contributing factors in the participant's jurisdiction; and civil rights findings, determinations, settlements (including Voluntary Compliance Agreements), or court orders; or, upon HUD's written notification specifying a material change that requires the revision. A revision to the AFH consists of preparing and submitting amended analyses, assessments, priorities, and goals that take into account the material change, including any new fair housing issues and contributing factors that may arise as a result of the material change.

### **b. Public Review and Comment**

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

The City will encourage participation from all residents, especially low- and moderate-income residents, minorities, persons with Limited English Proficiency



(in accordance with the City's LEP Plan), members of protected classes, and persons with disabilities.

## **G. Public Hearings, Notification and Access**

The following policies and procedures outlining the public hearing process and public hearing notification apply to the development and substantial amendment of the Consolidated Plan Documents.

### **1. Public Meetings and Hearings**

#### **a. Public Hearing Process**

The City will conduct at least two (2) public hearings per year to obtain citizens' views and comments on one or more of the Consolidated Plan Documents. These public hearings will be conducted at different times of the program year and together will cover the following topics:

- Housing and Community Development Needs
- Development of Proposed Activities
- Review of Program Performance

During a program year when the City develops an AFH or AI and Consolidated Plan, at least one public hearing will be conducted prior to the draft AFH or AI and Consolidated Plan being published for comment.

#### **b. Public Hearing Notification**

Staff will ensure adequate advance notice of all public meetings and hearings. Notices will be printed/posted at least 14 days prior to the meeting date. Adequate noticing will include:

- Printing a public notice in the *Sentinel Weekly*, or *Press Enterprise*, or other newspaper of general circulation in the City; and
- Posting notices electronically on the city website in a format accessible to screen readers for those who are visually impaired; and
- Posting notices at City Hall.

Additional forms of notification may be used to ensure robust participation. Notices will include information on the subject and topic of the meeting including summaries when possible and appropriate to properly inform the public of the meeting. Notices will be published in additional languages as required by the City's LEP Plan and will be accessible to those with disabilities. Meeting location and access is described below.

## 2. Documents for Public Review

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

Document	Length of Public Comment Period
Consolidated Plan	30 days
Action Plan	30 days
CAPER	15 days
AFH or AI	30 days
Citizen Participation Plan	30 days

The City will ensure that documents are available for disabled, minority and non-English speaking residents (in accordance with the LEP Plan).

Adequate noticing will include:

- Printing notices in the *Sentinel Weekly*, or *Press Enterprise*, or other newspaper of general circulation in the City;
- Posting notices electronically on the city website in a format accessible to screen readers for those who are visually impaired; and
- Posting notices at City Hall.

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

**City Hall: City Clerk's Office**  
**City Hall: Community Development Department**  
400 South Vicentia Avenue  
Corona, California 92882

**Corona Public Library**  
650 South Main Street  
Corona, California 92882

Materials will also be posted to the City website at:

<http://www.CoronaCA.gov/cdbg>.

All printed reports and materials shall be made available in a form accessible to persons with disabilities, upon request.

### **3. Access to Meetings**

Unless otherwise noted, public hearings will be conducted during a meeting of the Corona City Council in the Corona City Hall Council Chamber located at 400 South Vicentia Avenue, Corona, California 92882. For public meetings not requiring City Council action, the City will make every effort to conduct such meetings in the low- and moderate-income target areas and at times and in locations accessible and convenient to potential and actual beneficiaries.

Efforts to ensure broad participation may include, but are not limited to, scheduling meetings in target neighborhoods, scheduling meetings during hours that are not consistent with the evening City Council meeting schedule, scheduling meetings on the weekend, or requesting feedback from neighborhood groups and stakeholders for guidance in effective meeting scheduling. Such meetings or hearings will be published, posted, and advertised to allow sufficient notice to all interested persons.

In accordance with the City's LEP Plan, translation is available at all public hearings if the City Clerk's Office receives such a request at least 48 hours prior to the public hearing. The City Clerk may be reached at (951) 736-2201.

It is the intention of the City to comply with the Americans with Disabilities Act (ADA) in all respects. If an attendee or participant at a public hearing needs special assistance beyond what is normally provided, the City will attempt to accommodate these people in every reasonable manner. Efforts may include, but are not limited to, accessible seating, video recording for those homebound, sign language services and production of written transcripts. The City Clerk's Office must be notified at least 48 hours prior to the public hearing. The City Clerk may be reached at (951) 736-2201.

### **4. Access to Consolidated Plan Documents and CDBG/HOME Program Records**

Approved Consolidated Plan documents will be kept on file by the City at City Hall in the Community Development Department (400 South Vicentia Ave. Corona, CA 92882) and online at <http://www.CoronaCA.gov/cdbg>, and can be made available to those requesting the plan. Upon request, the City will make reasonable efforts to make documents available for non-English speakers (in accordance with the LEP Plan) or those with a disability upon request.

The City will ensure timely and reasonable access to information and records related to the development of the Consolidated Plan Documents, and the use of HUD CPD funds from the preceding five years. Information to be made available will include budget and program

performance information, meeting minutes, and comments received by the City during the development of the Consolidated Plan and its supporting documents.

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

## **H. Technical Assistance**

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

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

To request technical assistance, contact the CDBG Consultant.

## **I. Comments and Complaints**

### **1. Comments**

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

**CDBG Consultant**  
**Community Development Department**  
400 South Vicentia Avenue  
Corona, California 92882

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

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

**City Hall**  
**Community Development Department**  
400 South Vicentia Avenue  
Corona, California 92882

### **2. Complaints**

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

The City will accept written complaints provided they specify:

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

## **J. Language Access**

When a significant number of people speak and read a primary language other than English, translation services at public hearings will be provided in such language if translation services are requested in advance at least 48 hours prior to the public meeting. Requests should be addressed to the City Clerk's Office. The City Clerk may be reached at (951) 736-2201.

## **K. Appeals**

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

- CDBG Consultant
- Community Development Administrative Services Manager
- City Manager
- City Council
- Los Angeles Area Office of HUD (if concerns are not answered)

## **L. CDBG Disaster Recovery (CDBG-DR)**

In the event of a federally-declared major disaster or emergency for which the City of Corona is to receive and administer HUD disaster recovery assistance pursuant to the Robert T. Stafford Disaster Relief and Emergency Assistance Act and related Congressional Appropriations, either directly from HUD or through the State of California, the following citizen participation requirements shall apply to the development of Action Plans and Substantial Amendments to Action Plans for disaster recovery:

1. Before the City adopts the Action Plan for a disaster recovery grant or any substantial amendment to a disaster recovery grant Action Plan, the City will publish the proposed plan or amendment on the City website and will cross-reference with any additional disaster recovery websites established to provide information to the public concerning assistance that may be available.
2. The City and/or subrecipients will notify affected citizens through USPS and/or electronic mailings, press releases, public service announcements, public notice(s), and/or through social media.
3. The City will ensure that all citizens have equal access to information about the programs, including persons with disabilities and Limited English Proficiency (LEP) persons. Program information will be made available in the appropriate languages for the City.
4. Subsequent to publication of the Action Plan or substantial amendment, the City will provide a reasonable opportunity of at least seven (7) days for receiving comments, or a longer period as prescribed by the Federal Register Notice governing administration of the HUD disaster recovery assistance.
5. The City will take comments via USPS mail to: CDBG Consultant, Community Development Department, 400 S. Vicentia Avenue, Corona, CA 92882.

6. In the action plan, the City will specify criteria for determining what changes in the City's plan constitute a substantial amendment to the plan. At a minimum, the following modifications will constitute a substantial amendment: a change in program benefit or eligibility criteria; the addition or deletion of an activity; or the allocation or reallocation of a monetary threshold of more than \$750,000.
7. A public website shall be established and publicized specifically for the disaster. Initially, the City's CDBG website may be used at: <http://www.CoronaCA.gov/cdbg>. The website shall contain the Action Plan (including all amendments); each Quarterly Performance Report (QPR); procurement policies and procedures; executed contracts; status of services or goods currently being procured by the City (e.g., phase of the procurement, requirements for proposals, etc.).
8. The City will consider all written comments regarding the Action Plan or any substantial amendment. A summary of the comments and the City's response to each comment will be provided to HUD or the State with the Action Plan or substantial amendment.
9. The City will provide a timely written response to every citizen complaint. The response will be provided within 15 working days of the receipt of the complaint, to the extent practicable.
10. The City will notify HUD when it makes any plan amendment that is not substantial. HUD or the State will be notified at least five business days before the amendment becomes effective.

## **M. Anti-Displacement and Relocation**

The City's Anti-displacement and Relocation Plan describes how the City of Corona or project developer will assist persons who must be temporarily relocated or permanently displaced due to the use of HUD CPD funds. This plan takes effect whenever the City funds projects that involve the following:

- Property acquisition;
- Potential displacement of people from their homes and the need to relocate people (either permanently or temporarily); and
- The demolition or conversion of low- and moderate-income dwelling units.

### **1. Background**

Two acts apply whenever any of the above issues are present: the Uniform Relocation Assistance and Real Property Policies Act of 1970 (URA) and Section 104(d) of the Housing and Community Development Act of 1974. Each of these acts places different obligations on the City.

The URA governs the processes and procedures which the City and the Finance Department must follow to minimize the burden placed on low- and moderate-income tenants, property owners, and business owners who must move (either temporarily or

permanently) as the result of a project funded in whole or in part by the CDBG and HOME programs. The URA applies to:

- Displacement that results from acquisition, demolition, or rehabilitation for HUD-assisted projects carried out by public agencies, nonprofit organizations, private developers, or others;
- Real property acquisition for HUD-assisted projects (whether publicly or privately undertaken);
- Creation of a permanent easement or right of way for HUD-assisted projects (whether publicly or privately undertaken); and
- Work on private property during the construction of a HUD-assisted project even if the activity is temporary.

## **2. What is Displacement?**

Displacement occurs when a person moves as a direct result of federally assisted acquisition, demolition, conversion, or rehabilitation activities, because they are:

- Required to move; or
- Not offered a decent, safe, sanitary and affordable unit in the project; or
- Treated “unreasonably” as part of a permanent move or temporary move to accommodate the project (e.g., to permit property repairs).

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.

## **3. What is a Displaced Person?**

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, written notice of intent to acquire, or 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; and
- 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.

Corona offers advisory and financial assistance to eligible tenants (or homeowners) who meet the above definition.



#### **4. Persons Not Eligible for Assistance**

A person is not eligible for relocation assistance under the provisions of the URA if any of the following occurs:

- The person was evicted for serious or repeated violation of the terms and conditions of the lease or occupancy agreement, violation of applicable Federal, State, or local law, or other good cause. However, if the person was evicted only to avoid the application of URA, then that person is considered displaced and is eligible for assistance;
- The person has no legal right to occupy the property under State or local law;
- The City determines that the person occupied the property to obtain relocation assistance and the HUD Field Office concurs in that determination;
- The person is a tenant-occupant that moved into the property after a certain date, specified in the applicable program regulation, and, before leasing and occupying the property, Corona or its subgrantee provided the tenant-occupant written notice of the application for assistance, the project's impact on the person, and the fact that they would not qualify as a “displaced person” because of the project;
- The person is a tenant-occupant of a substandard dwelling that is acquired or a tenant-occupant of a dwelling unit to which emergency repairs are undertaken and the HUD field office concurs that:
  - Such repairs or acquisition will benefit the tenant;
  - Bringing the unit up to a safe, decent, and sanitary condition is not feasible;
  - The tenant’s new rent and average estimated monthly utility costs will not exceed the greater of: the old rent/utility costs or 30 percent of gross household income; and
  - The project will not impose any unreasonable change in the character or use of the property.
- The person is an owner-occupant of the property who moves because of an arm’s length acquisition;
- Corona or its subgrantee notifies the person that they will not displace him or her for the project; and
- The person retains the right of use and occupancy of the real property for life following the acquisition.

Corona determines that the person is not displaced as a direct result of the acquisition, rehabilitation, or demolition for the project and the HUD field office concurs in the determination.

## **5. Minimizing Displacement**

Corona will take reasonable steps to minimize displacement occurring as a result of its CDBG and HOME activities. This means that the Community Development Department will:

- Consider if displacement will occur as part of funding decisions and project feasibility determinations;
- Assure, whenever possible that occupants of buildings to be rehabilitated are offered an opportunity to return;
- Plan substantial rehabilitation projects in “stages” to minimize displacement; and
- Meet all HUD notification requirements so that affected persons do not move because they have not been informed about project plans and their rights.

## **6. Anti-Displacement Policy**

The City seeks to minimize, to the greatest extent feasible, the displacement, whether permanently or temporarily, of persons (families, individuals, businesses, nonprofit organizations, or farms) from projects funded with CDBG or HOME involving single- or multi-family rehabilitation, acquisition, commercial rehabilitation, demolition, economic development, or capital improvement activities.

Projects that Corona deems beneficial but that may cause displacement may be recommended and approved for funding only if Corona or its subgrantee demonstrates that such displacement is necessary and vital to the project and that they take efforts to reduce the number of persons displaced. Further, they must clearly demonstrate that the goals and anticipated accomplishments of a project outweigh the adverse effects of displacement imposed on persons who must relocate.

## **7. Displacement Assistance**

Consistent with the goals and objectives of the CDBG and HOME programs, Corona will take all reasonable steps necessary to minimize displacement of persons, even temporarily. If displacement occurs, the City will provide relocation assistance to all persons directly, involuntarily, and permanently displaced according to HUD regulations.

If Corona temporarily displaces a low- or moderate-income household, that household becomes eligible for certain relocation payments. The assistance applies to those persons residing in the residence at the time the application is processed and is based on the following procedures:

- If the structure and its occupants are determined eligible for temporary relocation assistance, the owner-occupants and tenants are eligible for the actual reasonable cost (based on fair market rent) of temporary lodging facilities until the structure is determined habitable by Corona's housing inspector;
- Corona must approve housing and the Lessor and Lessee must sign a rent agreement before move-in. Housing must be comparable functionally to the displacement dwelling and decent, safe, and sanitary. This does not mean that the housing must be in comparable size. The term "functionally equivalent" means that it performs the same function, has the same principal features present, and can contribute to a comparable style of living. Approved lodging accommodations include apartments and houses. Corona does not reimburse "rental expenses" for living with a friend or family member;
- Either Corona will provide the owner-occupants and tenants a direct payment for moving expenses (to and from temporary housing) and storage costs, or Corona will arrange moving and storage of furniture with a moving company. If Corona makes a direct payment, complete documentation and receipts are necessary to process claims when storage costs exceed the amount assumed by the direct payment;
- Damage deposits, utility hookups, telephone hookups and insurance costs are not eligible for reimbursement; and
- The City may pay the cost of relocation assistance from Federal funds or funds available from other sources.

## **8. One-For-One Replacement Dwelling Units**

Corona will generally avoid awarding funds for activities resulting in displacement. However, should Corona fund an activity, specific documentation is required to show the replacement of all occupied and vacant dwelling units demolished or converted to another use. Corona will assure that relocation assistance is provided as described in 24 CFR 570.606(b)(2).

Before obligating or expending funds that will directly result in such demolition or conversion, Corona will make public and submit to the HUD field office the following information in writing:

- A description of the proposed assisted activity;
- The general location on a map and approximate number of dwelling units by size (number of bedrooms) that will be demolished or converted to a use other than as low- and moderate-income units;
- A time schedule for the commencement and completion of the demolition or conversion;

- The general location on a map and approximate number of dwelling units by size (number of bedrooms) that will be provided as replacement units;
- The source of funding and a time schedule for the provision of replacement dwelling units; or
- The basis for concluding that each replacement dwelling unit will remain a low- and moderate-income unit for at least ten years from the date of initial occupancy.

Consistent with the goals and objectives of the CDBG and HOME programs, Corona will take all reasonable steps necessary to minimize displacement of persons from their homes. The City will avoid funding projects that cause displacement of persons or businesses and will avoid funding any project that involves the conversion of low- and moderate-income housing to non-residential purposes.

## **9. Decent, Safe and Sanitary Dwelling**

The basic definition is found at 49 CFR 24.2(1). The term decent, safe, and sanitary dwelling means a dwelling that meets the following standards and any other housing and occupancy codes that are applicable. It will:

- Be structurally sound, weather tight, and in good repair;
- Contain a safe electrical wiring system adequate for lighting and other devices;
- Contain a safe heating system capable of sustaining a healthful temperature for the displaced person;
- Be adequate to accommodate the displaced person. There will be a separate, well lit, ventilated bathroom that provides privacy to the user and contains a toilet, sink, and a bathtub or shower, all in good working order and properly connected to appropriate sources of water and to a sewage drainage system. There should be a kitchen area that contains a fully usable sink, properly connected to hot and cold water and to a sewage drainage system, and adequate space and utility service connections for a stove and refrigerator;
- Contain unobstructed egress to safe, open space at ground level;
- For a mobility-impaired person, be free of any barriers that would preclude reasonable ingress, egress, or use of the dwelling by such person. This requirement will be satisfied if the displaced person elects to relocate to a dwelling that they select and the displaced person determines that they have reasonable ingress, egress, and the use of the dwelling; and
- Comply with lead-based paint requirements of 24 CFR Part 35.

## **N. Real Property Policies**

The City and its CDBG or HOME recipients must follow specific guidelines regarding the acquisition and use of real property funded in whole or in part with CDBG or HOME funds.

### **1. Use of Real Property**

The following standards apply to real property within the recipient's control and acquired or improved, in whole or in part, using CDBG or HOME funds. These standards will apply from the date funds are first spent for the property until five years or more after the project is audited and closed.

A recipient may not change the use of any such property (including the beneficiaries of such use) from that for which the acquisition or improvement was made unless the recipient gives affected citizens reasonable notice of, and opportunity to comment on, any such proposed change, and either:

- The use of such property qualifies as meeting a national objective and is not a building for the general conduct of government;
- The requirements in the paragraph below are met;
- If the recipient determines, after consultation with affected citizens, that it is appropriate to change the use of property to a use that does not qualify under the above paragraph, it may retain or dispose of the property. The Corona CDBG or HOME program must be reimbursed in the amount of the current fair market value of the property less any portion attributable to expenditures of non-federal funds for the acquisition of and improvements to the property;
- If the change of use occurs within five years of the project being audited and closed, income from the disposition of the real property will be returned to the Corona CDBG or HOME program; and
- Following the reimbursement of the federal program pursuant to the above paragraph of this section, the property is no longer subject to any federal requirements.

### **2. Real Property Acquisition**

All real property acquisition activities described in this section and funded in whole or in part with CDBG or HOME funds and all real property that must be acquired for an activity assisted with Federal funds, regardless of the actual funding source for the acquisition, are subject to the URA (as amended).

### **3. What is Real Property Acquisition?**

Real property acquisition is any acquisition by purchase, lease, donation, or otherwise, including the acquisition of such interests as rights-of-way and permanent easements.

HUD Handbook 1378 and 49 CFR Part 24 currently contains such regulations. These regulations detail a standard procedure for acquiring property and methods of determining a purchase price and outline other documents that must be provided to Corona before disbursement of funds. These regulations further require the applicant to provide relocation payments and assistance to any business or residential occupant of the property whom the acquisition will displace.

#### **4. Eligible Activities**

Corona or its sub-grantee may acquire real property for a project using CDBG or HOME funds where the proposed use of the acquired property will be an activity that the City can demonstrate as beneficial to low- and moderate-income persons.