

DRAFT



**CITIZEN
PARTICIPATION PLAN
FY 2020/2024
ADOPTED June 2, 2020
Effective UNTIL JUNE 30, 2025**

ATTACHMENT D

**CITY OF RIVERSIDE
CITIZEN PARTICIPATION PLAN
FOR CONSOLIDATED PLAN DOCUMENTS**

In the “Guidelines for Preparing a Consolidated Plan Submission for Local Jurisdictions,” the U.S. Department of Housing and Urban Development Office of Community Planning and Development states that the “Consolidated Plan must result from an effective citizen participation process.” In addition, the jurisdiction “must develop and follow a detailed citizen participation plan that addresses each of the following elements which is described below.

- 1. Participation**
- 2. Access to Information**
- 3. Anti-Displacement**
- 4. Publishing the Plan**
- 5. Public Hearings**
- 6. Notice of Hearings**
- 7. Access to Meetings/Hearings**
- 8. Comments**
- 9. Substantial Amendments**
- 10. Amendments**
- 11. Performance Reports**
- 12. Availability to the Public**
- 13. Access to Records**
- 14. Technical Assistance**
- 15. Complaints**

HUD also requires that citizens, non-profit organizations, and other interested parties must be afforded adequate opportunity to review and comment on the original citizen participation plan” and to review and comment on substantial amendments to the citizen participation plan. Therefore, the local jurisdiction must make the citizen participation plan public.

The City of Riverside has taken actions necessary to comply with all of HUD’s citizen participation requirements as noted above. Actions include:

1. Participation

In order to ensure a wide-range of participation from citizens in the development of the five-year Consolidated Plan, Annual Action Plans, any substantial amendments to these plans, and the annual performance report, the City of Riverside shall conduct community outreach and education to all affected persons including those groups of persons specifically listed by HUD within its Consolidated Plan guidelines. This effort shall (where applicable) consist of

multiple contacts (posters, flyers, mailers, published notices, etc.) to the following groups of persons:

- low- and moderate-income residents where housing and community development funds may be spent;
- minorities and non-English speaking persons;
- persons with disabilities;
- non-profit and community-based organizations serving target populations;
- residents of assisted housing developments;
- recipients of tenant-based assistance;
- low-income residents within CDBG Target Areas;
- Riverside County Continuum of Care; and
- philanthropic organizations

2. Access to Information

The City of Riverside shall provide opportunities for residents, public agencies, and other interested parties, including those most affected, to receive information, review, and submit comments on any proposed submission concerning the proposed activities, and according to HUD guidelines, “including the amount of assistance the jurisdiction expects to receive (including grant funds and anticipated program income) and the range of activities that may be undertaken including the estimated amount that will benefit persons of low- and moderate-income.

Opportunities to receive information included:

- CDBG, HOME, ESG, and HOPWA newsletters/postcards mailed to resident households as well as representatives of local agencies, businesses, and neighborhood organizations;
- newsletters and or postcards made available in display stands at local libraries, community centers, Community & Economic Development Department and City Clerk’s offices;
- electronic or print newsletters and or postcards delivered for distribution at local committees, coalitions, and task forces meetings;
- Electronic or print newsletters and or postcards delivered to post and distribute at local community and recreational centers;
- Electronic or print newsletters and or postcards delivered to post and distribute by local community and recreational centers;
- information posted on City’s web site and social media pages; and
- published notices of meetings in local newspapers.

The City shall also conduct extensive outreach to inform local agencies regarding the opportunity to apply for CDBG, HOME, ESG, and HOPWA funds. Such outreach shall include a public notice for availability of funding, invitations to apply sent to local non-profit organizations, and at least one application

workshop for non-profit agencies and city departments. The City shall also provide technical assistance to persons or groups in developing their proposal during regular business hours.

3. Anti-Displacement

The City has in place an Anti-displacement and Relocation Plan describing assistance available to persons/families that become temporarily relocated or permanently displaced due to projects that use CDBG, HOME, HOPWA or ESG funds. The plan sets forth the City's plans, per HUD's requirement,

“to minimize displacement of persons and to assist any persons displaced, specifying the types and levels of assistance the jurisdiction will make available (or require others to make available) to persons displaced, even if the jurisdiction expects no displacement to occur.”

Copies of the Anti-displacement and Relocation Plan can be obtained by contacting the City of Riverside Housing Authority and Office of Homeless Solutions at (951) 826-5371.

4. Publishing the Plan

The City of Riverside shall publish its draft Consolidated Plan and Annual Action Plans so that affected citizens have sufficient opportunity to review it and provide comments for at least a 30-day period. A summary describing the contents and purpose of the Consolidated Plan and Annual Action Plans, including a list of the locations where copies of the entire plan may be examined, shall be published within the local newspapers.

Draft copies of these plans shall be made available at the following public places:

- City of Riverside Community & Economic Development Department;
- City of Riverside Grants Unit;
- City of Riverside Office of the City Clerk; and
- City of Riverside Main Public Library

Digital copies of these drafts and plans shall be made available on the City of Riverside Community & Economic Development Department website located at <https://riversideca.gov/cedd/community-development-block-grant-grants-funding>.

5. Public Hearings

The City of Riverside shall conduct at least two (2) public hearings annually in order to obtain citizen's views and to respond to proposals and questions concerning housing and community development needs, development of proposed activities, and review of program performance under the Consolidated Plan and Annual Action Plan. Each public hearing shall be held at times and

locations convenient to potential and actual beneficiaries, and with accommodation for persons with disabilities and non-English speaking residents. At least one (1) of the public hearings shall be conducted by the City Council to receive public comment on the proposed Consolidated Plan or Annual Action Plan.

Public Hearings may be streamed or broadcast via the internet. Any hearings that are broadcast for remote viewing will allow for the submission public comments. Any public comments submitted by remote viewing participants will be treated as equivalent to public comments made in person. In the case that a public hearing is broadcast for remote or virtual attendance, it will follow the same requirements as in-person hearings in regard to notification of the public and to be held at times and by methods convenient to potential and actual beneficiaries.

6. Notice of Hearings

Adequate advance notice shall be provided to community residents for each public hearing by publishing sufficient information in local newspapers at least two weeks before each public hearing. Sufficient information shall include:

- direct mailing of newsletters/postcards to resident households in the City of Riverside; and
- public notice published in The Press-Enterprise, and any other appropriate publication.

7. Access to Meetings

All public hearings and community meetings regarding the Consolidated Plan and Annual Action Plans shall be held at times and locations convenient to potential and actual beneficiaries, and the organizations that serve them. All meetings will be held in locations accessible to persons with disabilities with additional accommodations for persons with disabilities available upon requests. Language translation services shall be made available for non-English speaking residents.

Community members who speak and read a primary language other than English, may request materials pertaining to these actions be translated. Translation services must be requested of the Community & Economic Development Department at least five (5) business days prior to the public meeting.

It is the intention of the City to comply with Section 504 of the Rehabilitation Act of 1973, as amended, the Americans with Disability Act (ADA) of the 1990 and the ADA Amendment Act of 2008, the Fair Housing Act, and the Architectural Barriers Act in all respects. If an attendee or participant at a public hearing or public meeting needs special assistance beyond what is normally provided, the City will attempt to accommodate requests from persons with disabilities¹ in every reasonable manner². Persons seeking special accommodations must notify the City Clerk at least 72 hours prior to the public hearing or meeting so that appropriate accommodations may be arranged.

Public Hearings may be streamed or broadcast via the internet for remote citizen participation. Any hearings that are broadcast for remote viewing will allow for the participation of members of the public at offsite locations in an equivalent manner to onsite participation. In the case that a public hearing is broadcast for remote or virtual attendance, it will follow the same requirements as in-person hearings in regard to notification of the public, accessibility and will be held at times and by methods convenient to potential and actual beneficiaries.

8. Comments

The City of Riverside will comply with all HUD regulations in regarding length of public comment periods. The City of Riverside shall have a period of not less than 30 days to receive public comment prior to the regular submission of the Consolidated Plan and Annual Action Plans and implementation of any substantial amendments, and not less than 15 days for the regular submission of the Consolidated Annual Performance and Evaluation Report. In the case of natural disasters, public health emergency, or other officially declared special circumstance the regular public comment period may be shortened to no less than five (5) days in accordance with HUD guidelines. Notification to the public will advise citizens of how and where to submit comments, including public hearings. A summary of comments received, both oral and written, shall be included in the final plan document.

Citizen comments for all matters related to the Consolidated Plan can be directed to:

City of Riverside
Community & Economic Development Department,
CDBG/Grants Division
3900 Main Street, 5th Floor
Riverside, CA 92522
951.826.5649
Attn: Division Manager

¹ For example, special communication systems (e.g., TTY for persons who are hearing or speech impaired, materials on tape or in Braille).

² An individual with a disability is any person who has a physical or mental impairment that substantially limits one or more major life activities. The term "physical or mental impairment" may include, but is not limited to, conditions such as visual or hearing impairment, mobility impairment, HIV infection, mental retardation, drug addiction (except current illegal use of or addiction to drugs), or mental illness. The term "major life activity" may include seeing, hearing, walking, breathing, performing manual tasks, caring for one's self, learning, speaking, or working. Persons with disability are also persons who have a record of such impairment, or are regarded as having such impairment.

9. Substantial Amendments

The City of Riverside shall consider making a substantial amendment to the Consolidated Plan and/or Annual Action Plan when one of the following changes is proposed:

- the use of CDBG, HOME, ESG, or HOPWA funds is changed from one national objective to another;
- a new activity is proposed that is not contained in the Annual Action Plan;
- a funded activity described in the Annual Action Plan has a substantial change in scope or is cancelled; or
- a funded activity that needs a funding change of over \$50,000 or more than 10% of the original funded amount, whichever is less.

When a substantial amendment is proposed, the City shall provide affected citizens a period of not less than 30 calendar days to make comments before the amendment is implemented, except in the case of qualifying emergency actions which shall have a public comment period of not less than five (5) calendar days. Acceptable methods of meeting the citizen participation requirements include:

- publication of any proposed change 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 halls; or
- holding meetings with citizens' advisory groups within the city or area affected by the substantial amendment.
- Posting on official city websites or social media pages.

Notification to the public will 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, will be attached to the substantial amendment. Documentation of each notice will be retained for a minimum period of five years.

10. Amendments - Standard

Amendments that are not considered substantial (as described in #9 above) will be referred to as standard amendments. The City of Riverside, as specified in Title 24 of the Code of Federal Regulations, Part 91.505(a), will amend the Consolidated Plan when it:

- changes allocation priorities or funds distribution method; or
- revises policies, data, or goals; or
- modifies the funding, purpose, scope, location, or beneficiaries to a level which does not meet the threshold for a substantial amendment.

Such amendments are considered standard and do not require citizen participation.

11. Performance Reports

The City of Riverside shall publish its draft annual performance report so that affected citizens have sufficient opportunity to review it and provide comments for at least a 15-day period prior to submission to HUD. A summary describing the contents and purpose of the annual performance report, including a list of the locations where copies of the entire report may be examined, shall be published in the local newspaper.

12. Availability to the Public

The City of Riverside shall make available to the public copies of the Consolidated Plan as adopted, annual action plans, any substantial amendments, and annual performance reports to the public through the following means:

- City of Riverside Community & Economic Development Department;
- City of Riverside Grants Division;
- City of Riverside Office of the City Clerk; and
- City of Riverside Main Public Library

Digital copies of these plans and reports shall be made available on the City of Riverside website located at:
<https://riversideca.gov/cedd/community-development-block-grant-grants-funding>

13. Access to Records

All citizens will be given reasonable access to information and records regarding the Consolidated Plan and the programs and projects it covers. All information and records will be available through the office of the Community & Economic Development Department during regular business hours.

Copies of the Consolidated Plan will be available upon request. These documents may be obtained from the City of Riverside Community & Economic Development Department, CDBG/Grants Division. Most reasonable requests will be filled at no cost to the public. The City reserves the right to charge a fee for duplicating documents when such requests are not reasonable. Reasonableness will 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, e-mail, or by telephone. Program records maintained on file, or requiring research and compilation, will be provided

within a reasonable time period upon receipt of a written request, which specifically states the information desired. All books and records relating to the Consolidated Plan shall be maintained and available for a minimum period of five years.

This sub-section 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.

14. Technical Assistance

City of Riverside staff shall be available to all interested parties in order to answer questions, receive input and provide technical assistance related to Consolidated Plan programs, projects and activities. Representatives of groups serving of low- and moderate-income persons desiring to develop project proposals are encouraged to contact the Community & Economic Development Department, CDBG/Grants Division for technical assistance.

15. Complaints

Citizens, administering agencies, and other interested parties may submit complaints and grievances regarding the Consolidated Plan, Annual Action Plans, any substantial amendments and performance reports to the City of Riverside Community & Economic Development Department, CDBG/Grants Division.

Complaints and/or comments for all matters related to the Consolidated Plan can be directed to:

City of Riverside
Community & Economic Development Department,
CDBG/Grants Division
3900 Main Street, 5th Floor
Riverside, CA 92522
951.826.5649
Attn: Division Manager

Complaints on the following types of issues should be submitted in writing, be specific in their subject matter, and include facts to support the allegations:

- 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, HOPWA or HOME program regulations; or
- the administering agency, or any of its contractors, is purportedly engaging in questionable practices resulting in waste, fraud, or mismanagement of any program funds.

Upon receipt of a written complaint, Community & Economic Development Department staff will respond to the complainant in writing within 14 business days. If more time is needed due to the nature and complexity of the complaint, staff will notify the complainant in writing including the reason for the extension and the date on which a response can be expected.

The process also includes the opportunity for residents to present complaints and grievances orally or in writing at scheduled community meetings and/or a 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 Consolidated Plan, Annual Action Plan, or annual performance report.
