



The Process

A. Submission Requirements

1. Lead Agency

The lead agency for the development and implementation of the Consolidated Plan is the City of Pasadena Office of the City Manager, Housing and Community Development Division (HCDD). HCDD administers a myriad of housing and community development programs that are designed to assist low and moderate-income residents.

HCDD is responsible for the administration of several federal entitlement and competitive grant programs including: Community Development Block Grant (CDBG), HOME Investment Partnership (HOME), Emergency Shelter Grant (ESG), Housing Opportunities for Persons with AIDS (HOPWA), Housing Choice Voucher Program (HCVP), and the Continuum of Care for Homeless Assistance Programs (Supportive Housing Program and Shelter Plus Care). In addition, HCDD provides funding and monitors the activities of the City's designated Community Housing Development Organizations (CHDOs), which provides a variety of affordable housing activities.

The Institute for Urban Research and Development (IURD) served as the City's consolidated planning consultant for the preparation of the Consolidated Plan. IURD was founded in 1996. It is a non-profit, non-partisan, community-based research and development organization that assists public and private agencies with the advancement of strategic planning and model programs. IURD responds to the economic, housing, and social needs of neighborhoods, cities, and counties from local, regional, and national perspectives. IURD has also developed and implemented a wide range of programs and services designed to fulfill community-based strategies to address a variety of issues such as affordable housing, health care, community development, economic revitalization, fair housing, youth development, and homelessness.

IURD has completed over 40 community assessments concerning homelessness, housing, fair housing, health care, and economic development for local jurisdictions throughout Southern California. These assessments include the following for the City of Pasadena:

- The City of Pasadena 2005 Homeless Count;
- The City of Pasadena 2004 Homeless Survey;
- The City of Pasadena 2004 Continuum of Care Application;
- The City of Pasadena 10-Year Strategy to End Homelessness;
- City of Pasadena Five Year Consolidated Plan: 2000 – 2005.

2. Consultation/Coordination

HCDD conducted a series of public meetings with local public and private agencies, groups, and organizations whose primary focus is on affordable housing, at-risk-to-homeless households, children, employment, homeless persons, persons with mental and physical disabilities, persons with HIV/AIDS and their families, seniors, and other service activities for very low-, low-, and moderate-income individuals and households. Public meetings were held with the following entities:

1. Accessibility and Disability Commission;
2. Commission on the Status of Women;
3. Community Development Committee;
4. Human Services Commission;
5. Northwest Commission (Public Hearing was held 4/28/05);
6. Planning Commission;
7. Senior Commission.

In addition, there were three (3) public meetings with the Pasadena Housing and Homeless Network. The Network, which meets every month, is made up of more than 30 public and private organizations that include local government, non-profit agencies, faith-based organizations, neighborhood organizations, businesses organizations, and other local community service organizations. The Network also consists of several sub-committees that meet every month which include 1) Affordable Housing Committee; 2) Continuum of Care Committee; 3) Fair Housing Committee; and 4) Homeless Research Committee.

Each public meeting/hearing was advertised and open to the public. The purpose of the public meetings was to solicit input on the development of the Consolidated Plan and the process concerning homelessness, housing, and community and economic development needs and priorities. The purpose was also to solicit input concerning proposed activities that meet community needs.

3. Institutional Structure

HCCD is the lead agency for carrying out the Consolidated Plan. HCDD will continue to meet with the entities noted in the above section. HCDD co-chairs the Pasadena Housing and Homeless Network and serves on each of the Network's sub-committees.

HCDD is also the lead agency in assessing the strengths and gaps in the City's delivery system. Staff is responsible for the implementation of the Community Development Block Grant (CDBG), HOME Investment Partnership (HOME), Emergency Shelter Grant (ESG), Housing Opportunities for Persons with AIDS (HOPWA), Housing Choice Voucher Program (HCVP). Staff is also responsible for the implementation of the City of Pasadena 10-Year Strategy to End Homelessness and the City of Pasadena Continuum of Care.

Each of the above programs includes goals, objectives, and outcomes that are evaluated periodically by HCDD. The results of the evaluations are provided to the Community Development Committee (CDC) which is a local citizen advisory body made up of members who are appointed by the Pasadena Community Development Commission (City Council). The CDC makes recommendations based on staff's evaluations/recommendations. These recommendations are forwarded to the City Council/Pasadena Community Development Commission for approval.

HCDD is also responsible for the implementation of the Consolidated Plan Annual Action Plan and Consolidated Annual Performance and Evaluation Report (CAPER). The CAPER provides an annual assessment of accomplishments and goals of the federally funded projects.

B. Citizen Participation

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 are described below and outlined in Appendix A.

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. Performance Reports;
11. Availability to the Public;
12. Access to Records;

13. Technical Assistance;
14. Complaints;
15. Amendments.

HUD requires that citizens, non-profit organizations, and other interested parties 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 Pasadena has taken actions necessary to comply with all of HUD's citizen participation requirements as noted above. These actions include:

1. Participation

In order to ensure a wide-range of participation from citizens in the development of the Consolidated Plan, any substantial amendments to the Consolidated Plan and the Consolidated Annual Performance and Evaluation Report, the City of Pasadena conducted a community outreach and education campaign to those groups of persons specifically listed by HUD within its Consolidated Plan guidelines. The campaign consisted 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;
- residents of assisted housing developments;
- recipients of tenant-based assistance;
- low-income residents within Pasadena Enterprise Zone.

2. Access to Information

The City of Pasadena provided 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 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:

- flyers mailed to more than 500 representatives of local agencies, businesses, and neighborhood organizations, and city residents;
- flyers made available at public counters including libraries, schools, post offices, and City Hall public service counters;
- flyers delivered for distribution at local committees, coalitions, and task forces meetings;
- flyers delivered to post and distribute at local community service organizations;
- flyers delivered to post and distribute at local community and recreational centers;
- information posted on City's web site;
- information posted on local agency and coalition web sites;
- published notices of meetings and needs in local newspapers.

The City also conducted extensive outreach to inform local agencies regarding the opportunity to apply for CDBG funds. Such outreach included three (3) public workshops on the Request for Proposals (RFP) process, evaluation criteria, and proposal development for the City's 2005-2006 CDBG Program Year. The City also provided technical assistance to persons and groups in developing their proposal during regular business hours 8:00 a.m. to 5:00 p.m. Monday - Thursday.

3. Anti-Displacement

The Anti-displacement and Relocation Plan describes how the City will assist persons/families who become temporarily relocated or permanently displaced due to projects that use CDBG, HOME, 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."

For a complete description of the plan see Appendix B.

In addition, the City of Pasadena adopted a second amendment to its Condominium Conversion Ordinance effective November 2004. The Ordinance was developed as a result of the work done by the Housing Affordability Task Force. The Task Force was a locally appointed advisory body formed to assist the City in addressing the affordable housing needs of low-income residents.

The Ordinance is intended to provide tenants in good standing with protection and relocation assistance to assure that they find suitable replacement housing that is affordable, decent, safe and sanitary. Title 9 of the Pasadena Municipal Code (PMC) was amended to include Chapter 9.75 (Public, Peace, Morals and Welfare) which establishes the following provisions:

- Landlords are required to provide tenants with a copy of a one-page City authorized multi-lingual information sheet. The information sheet outlines the provisions of the Ordinance, and will provide links to appropriate websites for additional information (i.e., City of Pasadena website, the City's Fair Housing/Housing Mediation Contractor, etc.);
- If a unit is removed from the rental market for purposes of demolition, as a result of a government order to vacate due to violations of health and safety code violations, or the permanent removal of the unit from the rental market, the landlord will be required to pay the displaced tenant a relocation allowance and a moving expense;
- In cases of temporary relocation, the landlord shall be required to pay applicable temporary relocation costs on a per-diem basis in certain evictions.

(Note: Single-family homes and condominiums are exempt from this provision).

Chapter 16 of the PMC (Standards for Conversion Projects) was amended to provide tenants in good standing with the right to:

- purchase the subject unit;
- terminate the lease;
- receive an applicable relocation allowance.

The City of Pasadena Office of the City Manager, Housing/Community Development Division functions as the monitor to ensure compliance with this Ordinance. The Tenant Protection Ordinance is a local ordinance and is only applicable in certain evictions related to projects that do not use federal funds.

4. Publishing the Plan

The City of Pasadena published its draft Consolidated Plan in a manner to allow affected citizens sufficient opportunity to review it and provide comments. A summary describing the contents and purpose of the Consolidated Plan including a list of the locations where copies of the entire plan may be examined were published in the following local newspapers:

- The Pasadena Star News which is a daily publication that focuses on local community news;
- The Pasadena Journal which is a weekly publication whose primary market is the African American Community;
- La Opinión which is the region's largest daily newspaper printed in Spanish.

In addition, the draft Consolidated Plan was made available at the following public places:

- Housing and Community Development Division;
- Office of the City Clerk;
- Department of Human Services and Recreation;
- Central Library and each of the City's nine (9) local branches;
- Department of Planning and Development/Northwest Programs Office;
- Villa-Parke Community Center;
- Jackie Robinson Center;
- Robinson Park Community Center;
- Victory Park Community Center;
- Neighborhood Connections Office;
- Pasadena Police Department/Community Relations;
- Accessibility and Disability Office;
- American Friends Service Committee;
- Armenian Relief Society;
- El Centro de Acción Social Inc.;
- Pasadena Senior Center;
- AIDS Service Center;
- Passageways;
- Ecumenical Council of the Pasadena Area Churches.

5. Public Hearings

The City of Pasadena provided two (2) public hearings 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. One (1) public hearing was held before the draft Consolidated Plan was published for comment. The first public hearing meeting was held on Thursday, April 28, 2005 before the Northwest Commission. The second public hearing was held on Monday, June 13, 2005 with the Pasadena City Council. A third public meeting will focus on the Consolidated Annual Performance and Evaluation Report (CAPER) and will be held in September of 2005.

Each of the public hearings were held at times and locations convenient to potential and actual beneficiaries, and with accommodations for persons with disabilities. The hearings were conducted during the evening hours and each hearing was held at a public facility that had adequate accommodations for persons with disabilities. Available accommodations included listening assistive devices, braille, etc.

The needs of non-English-speaking residents were also met. Language translation services were available upon request.

6. Notice of Hearings

Adequate advance notice was provided to community residents for each public hearing by publishing sufficient information in local newspapers 15 days before each public hearing. Sufficient information included the date, time, and location of the hearing and the purpose of the public hearing. Local newspapers included the Pasadena Star News, the Pasadena Journal, and La Opinión.

7. Access to Meetings

A timeline was created and posted. Local meetings included:

Accessibility and Disability Commission	March 4, 2005
Senior Commission	March 8, 2005
Commission on the Status of Women	April 11, 2005
Human Services Commission	March 22, 2005
Northwest Commission	April 28, 2005 (Public Hearing)
Planning Commission	April 13, 2005
Community Development Committee	April 14, 2005

8. Comments

After publication of the draft Consolidated Plan, the City of Pasadena convened a public hearing to obtain views of residents on projects proposed for funding in the ensuing program year. The Consolidated Plan, developed and disseminated by the HCDD described each proposed project in sufficient detail to enable citizens to determine how they may be affected.

Copies of the draft Consolidated Plan were available to the public for review at the office of HCDD, public libraries throughout the City, and on the City's web site. Citizens were notified of library locations and the time and location of the public hearing through advertisement of a public notice in several newspapers and on the web site.

Citizens had 30 calendar days (the public comment period was from May 15 – June 13 of 2005) and up to the day of the public hearing to comment. On the day of the public hearing, comments could be submitted in writing or made orally at the public hearing. All public comments (orally and in writing) are included in the final Consolidated Plan submitted to HUD.

9. Substantial Amendments

The City of Pasadena determined that a substantial amendment is required when:

- the use of CDBG funds is changed from one national objective to another;
- a change in funding level is greater than 20% of the entitlement.

The City of Pasadena also determined that it will provide affected citizens a period of not less than 30 calendar days to make comments on a substantial amendment before it is implemented. 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, community centers, and city hall;
- holding meetings with citizens' advisory groups within the area affected by the substantial amendment.

Notifications 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 of the Consolidated Plan. Documentation of each notice will be retained for a minimum of five years.

10. Performance Reports

At least 15 calendar days will be provided for the receiving of comments for performance reports before reports are submitted to HUD.

11. Availability to the Public

The City of Pasadena will make copies of the Consolidated Plan available as adopted including substantial amendments, and the performance report to the public through the following means:

- Office of the City Manager/Housing and Community Development Division;
- Office of the City Clerk;
- Department of Human Services and Recreation;
- Central Library and each of the city's nine (9) local branches;
- Department of Planning and Development/Northwest Programs Division;
- Villa-Parke Community Center;
- Jackie Robinson Center;
- Robinson Park Community Center;

- Victory Park Community Center;
- Office of Neighborhood Connections;
- City web site.

12. Access to Records

All citizens will be given reasonable access to information and records regarding the Consolidated Plan and the projects it covers. All information and records will be available at the office of HCDD Monday through Thursday from 8:00 a.m. to 5:00 p.m.

Copies of the Consolidated Plan will be available upon request. These documents may be obtained from HCDD. 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. Current copies of all major documents related to the Consolidated Plan and Consolidated Annual Performance and Evaluation Report (CAPER) will be posted on the City's web site at <http://www.cityofpasadena.net>.

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

City of Pasadena
Office of the City Manager
Housing and Community Development Division
P.O. Box 7115
Pasadena, CA 91109
Tel. 626.744.8300 Fax. 626.744.8340

Attn: Gregory Robinson
Housing and Community Development Administrator

13. Technical Assistance

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

14. Complaints

Citizens, administering agencies, sub-recipients, non-profits, and other interested parties may submit complaints and grievances regarding the Consolidated Plan. At the beginning of the consolidated planning process, the City of Pasadena determined a process for complaints. The process includes requirements that should be in writing, specific in their subject matter, and include facts to support allegations.

The following are considered to constitute complaints to which a response is due:

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

The process also includes the opportunity for residents to present complaints and grievances orally or in writing at the community meetings and/or public hearings. All public comments, including complaints and grievances, made either orally or in writing within the 30-day public comment period, are included in the final Consolidated Plan.

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

Within 15 working days of receiving the complaint, HCDD will respond to the complainant in writing. A copy of HCDD's response will be transmitted, to the complainant. If due to unusual circumstances, HCDD may find that it is unable to meet the prescribed time limit to respond, the limit may be extended by written notice to the complainant. The HCDD's notice will include the reason for the extension and the date on which a response is expected to be generated, which may be based on the nature and complexity of the complaint.

All requests for copies of public records are processed through the City of Pasadena, Office of the City Clerk and City Attorney's Office.

15. Amendments - Standard

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

- changes its allocation priorities or funds distribution method;
- revises policies, data, or goals;
- modifies the purpose, scope, location, or beneficiaries.

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