

**I. INTRODUCTION**

The City follows HUD’s guidelines for citizen and community involvement concerning the Consolidated Plan. As the Lead Agency for the Consolidated Plan, it is the intent of the City to provide for and encourage citizen participation throughout the process of implementing the federal entitlement programs (specifically CDBG, HOME, and ESG). Hearings are conducted to allow the public to provide input and comments.

Towards this end, the City has established advisory bodies to assist the City in allocating and monitoring the use of federal entitlement funds. The two advisory bodies utilized for implementing federal entitlement funds are known as the Northwest Commission (reference City Ordinance No. 6404) and Human Services Commission (reference City Ordinance No. 6507). These advisory bodies represent various segments of the community including:

- ❖ Low/Moderate income residents;
- ❖ Minority groups;
- ❖ Elderly;
- ❖ Handicapped; and
- ❖ the Business community

**Northwest Commission**

**Meeting Information:**

Date: 2<sup>nd</sup> Tuesday of each month  
Time: 6:30 p.m.  
Location: Jackie Robinson Center  
1020 N. Fair Oaks Ave.  
Pasadena, CA 91103

This advisory commission consists of 11 members who are appointed by City Council. The northwest part of the City has the highest concentration of low/moderate income residents. The purpose of the commission is to advise and make recommendations to City Council regarding economic development in Northwest Pasadena. This advisory board monitors the allocation of CDBG funds used for non-public service activities.

**Human Services Commission**

**Meeting Information:**

Date: 2<sup>nd</sup> Wednesday of each month  
Time: 6:00 p.m.  
Location: Jackie Robinson Center  
1020 N. Fair Oaks Ave.  
Pasadena, CA 91103

This advisory commission consists of 13 members, 8 of which are appointed by City Council, one by the Pasadena Community College Board of Trustees, one by the Pasadena Unified School District, and 3 members who are recommended by agencies that provide human services to Pasadena. This commission was established to respond to significant unmet human service needs and gaps in the city. The purpose of the board is to advise and make recommendations to City Council regarding human service needs of people of all ages in the community. This advisory body monitors the allocation of funds used for public service activities.

## **II. COMMUNITY NEEDS SURVEY**

In order to evaluate specific housing and community development needs in the City, staff elected to use a survey instrument (Appendix B). The survey is administered in paper form at commission meetings and/or electronically through the City website and social media. It consists of a variety of housing and community development needs for specific improvement types organized into the following categories: Public Services, Housing, Public Facility Improvements, Infrastructure Improvements, and Economic Development. Results of the survey are utilized to determine priorities in the Consolidated Plan and within the Notice of Funding Award (NOFA) process for the allocation of entitlement funds. Surveys are administered at commission meetings during the winter quarter, and are advertised through public noticing.

## **III. PUBLIC NOTICE, REVIEW & HEARINGS**

The City shall hold at least two public hearings annually before City Council. The hearings shall be held prior to the submission of the City's Consolidated Plan, Annual Action Plan and Consolidated Annual Performance and Evaluation Report (CAPER).

The City shall provide sufficient advance notice of hearings and commission meetings by advertising times and locations in several local newspapers, through social media and the City website. Hearings and commission meetings are held in buildings that are readily accessible to the handicapped.

Action Plan public hearings are advertised with a minimum 30-day notification period, also referred to as the public review period. The CAPER will have a minimum public review period of 15 days. During the public review period, draft versions of the Annual Action Plan and CAPER are made available throughout the City (libraries, senior centers, City website, etc.). The public notice invites citizens to review the draft documents and to attend the public hearings to present oral and written comments to the City Council for consideration in approving the document. Citizens unable to attend the public hearings are invited to submit written comments to the City up to and including the day of the

public hearing. The City will receive and respond to any oral and written comments at meetings and public hearings. Written comments received through the City and at the public hearing and a transcript of oral comments received will be included in the final copy of the document before submission to U.S. Department of Housing and Urban Development (HUD).

#### **IV. AMENDMENTS AND ADMINISTRATIVE UPDATES**

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

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

##### **Standard Amendment**

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

##### **Substantial Amendment**

The City has determined that an amendment is substantial when:

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

The City will post a public notice and provide a public review period for a minimum of 30 calendar days, for citizens to make comments on a substantial amendment before it is implemented and submitted to HUD.

##### **Substantial Emergency Amendment**

The City has determined that an amendment is a substantial emergency when:

- It may be necessary to amend the Consolidated Plan and/or Annual Action Plan in the event of a National Emergency, State of Emergency, and Public Health Emergency including terrorism and infectious diseases, or natural disasters (i.e.

earthquake, wildfire, severe storm, wind storm, tornado, flood, or mudslide). To comply with the national objective of meeting community development needs having a particular urgency, an activity will alleviate existing conditions that the City of Pasadena certifies:

- Pose a serious and immediate threat to the health and welfare of the community;
  - Are of recent origin or recently became urgent (within the past 18 months);
  - The City is unable to finance the activity on its own; and,
  - Other resources of funding are not available to carry out the activity
- Amendments may include funding new activities and/or the reprogramming of funds including canceling non-performing activities to meet community development needs that have a particular urgency.

The City will post a public notice on the Housing Department website and provide a public review period for a minimum of 5 calendar days, for citizens to make comments on a substantial emergency amendments before it is implemented and submitted to HUD. Public hearing requirements can be met with virtual public hearings if:

- 1) National/local health authorities recommend social distancing and limiting public gatherings for public health reasons; and
- 2) Virtual hearings provide reasonable notification and access for citizens in accordance with the grantee's certifications, timely responses from local officials to all citizen questions and issues, and public access to all questions and responses.

All interested persons are invited to participate electronically by submitting comments to [publiccomment@cityofpasadena.net](mailto:publiccomment@cityofpasadena.net) prior to the start of the City Council meeting. Or during the meeting and prior to the close of the public hearing, members of the public may submit up to 200 words to be read aloud, if so desired, at the following webpage: [www.cityofpasadena.net/city-clerk/public-comment](http://www.cityofpasadena.net/city-clerk/public-comment).

### **Administrative Updates**

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

**Submission of Amendments and Administrative Updates to HUD**

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

**V. PARTICIPATION BY NON-ENGLISH SPEAKING RESIDENTS**

It is the intent of the City to allow for input by all non-English speaking residents in the public hearing process. Due to the significant number of Spanish speaking residents in the City, an interpreter will be present upon request at all federal entitlement program-related community meetings and/or public hearings.

**VI. TECHNICAL ASSISTANCE**

It is the intent of the City to provide technical assistance to all residents interested in developing proposals for the future use of entitlement funds. To ensure that residents are aware of this assistance, advertisement of public information meetings related to the development and the review of proposed activities will include reference to this service.

**VII. COMPLAINTS & GRIEVANCES**

The City recognizes that despite making significant efforts through outreach and education there may be complaints and/or grievances files regarding the operation of the City's federal entitlement programs. These concerns should be addressed to the following:

City of Pasadena, Department of Housing  
Attn: William K. Huang, Housing Director  
P.O. Box 7115 Pasadena, CA 91109

Office Location: Renaissance Plaza  
649 N. Fair Oaks Ave. Suite 202, Pasadena, CA 91103  
Telephone: (626) 744-8300

When practical, a written response will be made by the City within 15 working days. If it should take longer to develop a response the City shall notify the correspondent in writing within 15 working days of the time period needed to provide an answer.

## VIII. DISPLACEMENT OF RESIDENTS

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

### BACKGROUND

The City of Pasadena has adopted a policy that requires that a relocation assessment be completed in any circumstance in which it is anticipated even one person will be displaced as the result of a project using federal funds. This policy exceeds all State and Federal requirements. The purpose of this assessment is to insure the City of Pasadena is advised early in the process of any major relocation problems that could be encountered in a project. The early recognition of problems gives the City the opportunity to review the impact that the project may have on the community.

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

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

### Definitions

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

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

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

- Acquisition of, or written notice of intent to acquire, or initiation of negotiations to acquire, such real property, in whole or in part, for a project;

- Rehabilitation or demolition of such real property for a project;
- Rehabilitation, demolition, or acquisition (or written notice of intent) of all or a part of other real property on which the person conducts a business or farm operation, for a project.

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

## **RELOCATION OF DISPLACED PERSONS**

When a substantial number of persons will be displaced from their dwellings the City of Pasadena will encourage the residents and community organizations in the displacement area to form a relocation committee. The committee will include, when applicable, residential owner occupants, residential tenants, business people, and members of existing organizations within the area. In lieu of initiating a new process of citizen participation, public entities, which have conducted or are conducting a citizen participation process as part of an existing development program, will be utilized and committees they formed may be substituted if the goals of Citizen Participation will be reached.

During the relocation planning process the City of Pasadena will, at a minimum, guarantee the following:

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