



CITIZEN PARTICIPATION PLAN

**FOR FEDERALLY-FUNDED HOUSING AND
COMMUNITY DEVELOPMENT ACTIVITIES**

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CITY OF PLEASANTON

CITIZEN PARTICIPATION PLAN

**for Federally-Funded Housing and
Community Development Activities**

I. Introduction

The City of Pleasanton receives funds from a variety of programs administered by the federal Department of Housing and Urban Development (HUD). The HOME Investment Partnership Program and the Community Development Block Grant (CDBG) are two major sources of entitlement funding for the City's housing and community development programs. However, the City also utilizes other funding, including the use of City Lower-Income Housing Funds and General Funds, to achieve its objectives. Inasmuch as new funding sources are established and/or changed each year, this Citizen Participation Plan will apply to all federally-funded programs.

The City of Pleasanton is an entitlement jurisdiction and has received an annual formula allocation of CDBG funds directly from HUD since 1994. CDBG provides funding for street improvements, public facilities, removal of architectural barriers, housing rehabilitation, construction of new affordable housing, and many other activities. HOME funds are received through Pleasanton's participation in the Alameda County HOME Consortium. The Alameda County Housing and Community Development (HCD) office is the lead agency for the HOME Consortium. The HOME Consortium was established in 1991 for the development or rehabilitation of affordable housing. The HOME Consortium is comprised of all jurisdictions in the county except Oakland and Berkeley, which are separate entitlement jurisdictions under the HOME Program.

In accordance with the provisions of Section 104(a) of the 1987 Housing and Community Development Act and 24 CFR Part 91 -- "Consolidated Submission for Community Planning and Development Programs; Final Rule," this Citizen Participation Plan reflects the various ways in which citizens participate in federally-funded housing and community development programs and activities in the City of Pleasanton to work toward the fulfillment of overall program goals.

II. Purpose and Goals

The overall purpose of the Citizen Participation Plan (CPP) is to provide for and encourage citizens to participate in an advisory role in planning, implementing, and assessing the City of Pleasanton's housing and community development programs and activities. More specifically, the goals of the CPP are to:

- A. Encourage citizens, particularly very low and low income residents of low and moderate income neighborhoods, to participate in the development of the five-year Consolidated Plan, annual Action Plan, substantial amendments to Consolidated/Action Plans, and the Annual Performance Report;
- B. Designate community needs which can be addressed by the City of Pleasanton's housing and community development programs and activities; and
- C. Provide community support and participation in the various activities and projects sponsored by the City of Pleasanton.

III. General Approach to Citizen Participation

A. Open Participation

1. All aspects of the City's housing and community development programs and activities will be conducted in an open manner with freedom of access for all interested persons.
2. In the case of target area improvements, such as streets or parks, target area residents will be involved in the development and review of policy decisions regarding the design and implementation of such projects.
3. Citizens will be involved in the development of all aspects of the City's housing and community development programs and activities, including establishing City policy and funding, the five-year Consolidated Plan, annual Action Plan, substantial amendments to the Consolidated/Action Plans, Annual Performance Report, and Citizen Participation Plan.
4. Citizens will also participate in suggesting program improvements, and in marketing and evaluating the City's housing and community development programs and activities.

B. Funding Availability

Citizens, public agencies, and other interested parties will have information available to them that includes the amount of assistance the City of Pleasanton expects to receive and the range of eligible activities that may be undertaken. This information will be published in one or more newspapers of general circulation at least 30 days prior to the date applications for funding are due.

C. Public Review Period

The public review periods will be scheduled as required and as detailed in Section V. and Section VII. of this plan.

D. Technical Assistance Provided by Both City and County Staff

1. Both City and County staff will offer technical assistance to citizens, citizen organizations, groups of low and moderate income persons, and groups of residents of blighted neighborhoods which request assistance in developing proposals.
2. Technical assistance includes the provision of necessary information, counseling on procedures and processes, and assistance in completion of any and all forms necessary to submit a proposal. Technical assistance does not include writing of proposals.

E. Bilingual Assistance

The City of Pleasanton recognizes the need of the area's non-English speaking residents and will attempt to meet those needs to the extent possible. The City will provide information and staff assistance in languages, as necessary and reasonably expected, to allow non-English speaking residents the opportunity to participate in the City's housing and community development programs and activities.

IV. Levels of Participation

There are four levels in the City's citizen participation process: 1) individual citizens; 2) neighborhoods; 3) the City of Pleasanton; and 4) the County of Alameda. This structure maximizes the opportunities citizens have to participate in the City's housing and community development programs and activities. Each level includes the distribution of information, community outreach, and public hearings and meetings to plan and implement City programs and activities.

A. Individual Citizen Level

1. Citizens have an opportunity to register comments and/or complaints by letter, by telephone, or in person. A summary of comments, and a summary of any comments not accepted and the reasons therefore, will be attached to the applicable document upon submission to HUD. To the extent possible, City staff will respond to all citizen comments within fifteen (15) working days of their receipt.

B. Neighborhood Level

1. In some cases, there may be target neighborhoods which are the focus of certain City housing and community development programs. These neighborhoods are those census tracts and block groups in which over 50% of the households have low/moderate incomes.

2. Public meetings, "open houses," and other means of outreach will be used to assure participation by neighborhoods in the planning and implementation of all projects. The meetings will be widely advertised in accordance with the CPP, and substantial efforts will be made to notify all neighborhood residents of meetings.

C. City of Pleasanton

At the local level, the City's Human Services Commission and Housing Commission advise on housing and community development matters, including at times the formulation and operation of the City's housing and community development programs and activities. The Human Services Commission coordinates public services, while the Housing Commission considers matters related to housing. These two Commissions function as the local citizens advisory committees (CACs) for federally-funded housing and community development programs and activities.

Commission members are appointed by the Pleasanton City Council. In their function as CACs, the two Commissions address program issues and represent the range of incomes and ethnicities present within the resident population of Pleasanton, including designated target areas. The two Commissions meet regularly and advise staff on project development, implementation and assessment of performance.

D. County of Alameda

1. City staff participates in the Alameda County HOME Consortium Technical Advisory Committee (TAC) and coordinates with the staff of the County and other participating cities in matters involving the Consolidated Plan, Action Plan, Annual Performance Report, and other related matters. Meetings are held bi-monthly and are open to the public for citizens wishing to comment on matters being considered by the TAC.
2. The County's Housing and Community Development Advisory Committee (HCDAC) advises County staff on matters which relate to the HOME Consortium Consolidated Plan, Action Plan, Annual Performance Report, and other related matters. The HCDAC is appointed by the Board of Supervisors and represents a cross-section of the population including low and moderate income persons and minorities. At least one public hearing will be held annually before the HCDAC prior the publication of the draft Consolidated or Action Plan to allow citizen review and comment on housing and community development needs and development of proposed activities. In addition, one public hearing is held annually before the HCDAC to allow citizen review and comment on annual program performance, as set forth under Section VII (applicable to the HOME Consortium). All necessary information for such citizen review and assessment is made available at the hearings as well as in advance of the hearings in accordance with the CPP.

V. **Process and Schedule for City of Pleasanton Housing and Community Development Programs and Activities**

A. **Program Development**

1. Citizens will have the opportunity to submit project proposals for funding through the City's allocation of federal funds. The project selection process will result in the evaluation, prioritization and selection of projects for funding according to City needs and objectives.
2. The City shall hold a public hearing at the initial stage of application development on community development and housing needs and priorities. This hearing will be completed by the end of January/February.
3. The City's Housing Division and Department of Parks and Community Services will provide technical assistance to the Human Services Commission, Housing Commission, and to other citizen groups and organizations on the preparation of project proposals.
4. The CAC will hold a public hearing in March to consider applications for federal funding. The public hearing will provide an opportunity for presentations from applicants and testimony from interested members of the public. The CAC will formulate a recommendation for allocating federal funds, which will be forwarded to the City Council for its consideration at another public hearing in April/May.
5. Notice of all public hearings held throughout the application process will be published at least two weeks prior to each hearing, in easily readable type in the non-legal section of newspapers of general circulation, including minority and non-English language newspapers of general circulation where they exist. Such notices will indicate the date, time, place, and procedures of the hearing and topics to be considered.
6. On behalf of the City (through its participation in the Alameda County HOME Consortium), the County will publish annually, in a newspaper of general circulation, a summary of the contents of the Consolidated or Action Plan. In May, the Alameda County Board of Supervisors will hold a public hearing on the proposed Consolidated or Action Plan prior to final approval.
7. After hearing all testimony regarding the proposed Consolidated or Action Plan, the Board of Supervisors will approve the Consolidated Plan and authorize its submission to HUD.

B. Program Implementation and Evaluation

1. The County will inform the CAC of the status of projects and major decision points in project implementation. In addition, the CAC will review policy changes.
2. The Annual Performance Report for the City of Pleasanton (part of the Alameda County HOME Consortium Annual Performance Report) will be made available to the CAC and other interested organizations and individuals for public review and comment. Citizen comments received during the program year will be included in the City of Pleasanton's section of the Annual Performance Report.

VI. Citizen Comment on the Citizen Participation Plan and Substantial Amendments to the Citizen Participation Plan

The City of Pleasanton will provide opportunity for citizens to comment on the original CPP and on any substantial amendments.

A. Public Review Notice and Period

1. A public notice will be published in one or more local newspapers of general circulation, which will include a summary of the contents of the CPP or substantial amendments and a list of the locations where complete copies may be examined.
2. The summary of the CPP or substantial amendment will be available in formats accessible to persons with disabilities, upon request.
3. There shall be a 30-day public review period for the original CPP or any substantial amendments. Any comments or complaints of citizens received in writing, or orally shall be considered by the City. A summary of the comments or complaints, and a summary of any comments or complaints not accepted and the reasons therefore, will be attached to the CPP or substantial amendment.

VII. City of Pleasanton Displacement Plan

The City of Pleasanton will comply with Department of Housing and Urban Development (HUD) regulations, Uniform Relocation Assistance and Real Property Acquisition for Federal and Federally Assisted Programs of 1986, when real property is acquired to implement activities of the City's housing and community development programs and activities and if persons are involuntarily displaced. Guidelines are applicable to real property owners, tenants, business establishments and mobile homes.

When relocation will occur, persons scheduled to be displaced are furnished with a written description of the urban county relocation program as soon as feasible. The program includes a description of replacement housing and other relocation payments, conditions of eligibility and procedures for obtaining payment, advisory services that are available, explanation of the 90 day advance notice and assurance that the displaced cannot be required to move permanently unless at least one comparable replacement dwelling has been made available.

Benefits include a choice from three or more comparable replacement dwellings or replacement housing payments, transportation to inspect housing, payment for moving and related expenses and counseling to minimize adjustment hardships.

- A. General: The City of Pleasanton will comply with U.S. Department of Housing and Urban Development (HUD) regulations, Uniform Relocation Assistance and Real Property Acquisition for Federal and Federal Assisted Programs of 1986, when real property is acquired to implement the City's housing and community development programs and activities and if persons are involuntarily displaced. Guidelines cover real property owners, tenants, business establishments and mobile homes.
- B. Acquisition: Real property will be acquired expeditiously and by negotiation only after a written appraisal. Owners will be offered just compensation and will be paid before surrendering possession of their property.
- C. Relocation: As soon as feasible, persons scheduled to be displaced are furnished with a written description of the urban county relocation program, if applicable. The program includes a description of the replacement housing and other relocation payments, condition of eligibility and procedures for obtaining payment, advisory services that are available, explanation of the 90-day advance notice and assurance that the displaced cannot be required to move permanently unless at least one comparable replacement dwelling has been made available. Benefits always include a choice from three or more comparable replacement dwellings or replacement housing payments, transportation to inspect housing, payment for moving and related expenses and counseling to minimize adjustment hardships.

VIII. The Five-Year Consolidated Plan, Annual Action Plan, Annual Performance Report, and Substantial Amendments to the Consolidated/Action Plans

This section is applicable to each jurisdiction participating in the Alameda County HOME Consortium. The HOME Consortium was established in 1991 for the development or rehabilitation of affordable housing. The HOME Consortium includes the cities of Alameda, Fremont, Hayward, Livermore, Pleasanton, San Leandro, and Union City, and the Urban County jurisdictions of Albany, Dublin, Emeryville, Newark, and Piedmont, and the unincorporated areas. Each CDBG entitlement jurisdiction has adopted this section as a part of its Citizen Participation Plan. As lead agency of the Alameda County HOME Consortium, Alameda County HCD is responsible for coordinating the Alameda County HOME Consortium Consolidated Plan, Action Plan, and Annual Performance Report.

A main goal of the Citizen Participation Plan is to encourage citizens, particularly low and moderate income residents of low and moderate income neighborhoods, to participate in the development of the five-year Consolidated Plan, annual Action Plan, substantial amendments to Consolidated/Action Plans, and the Annual Performance Report.

The five-year Consolidated or annual Action Plan is due to HUD 45 days before the start of the program year. The Annual Performance Report is due to HUD 90 days after the end of the program year.

A. Consolidated Planning Process

As part of the consolidated planning process, at least two public hearings will be held each program year to obtain citizens' views and to respond to proposals and questions. The public hearings will be conducted at two different stages of the program year with one occurring prior to the Consolidated or Action Plan being published for comment. Together the hearings must address housing and community development needs, development process of proposed activities, and review of program performance.

1. The first public hearing will be held prior to the draft publication of the five-year Consolidated or annual Action Plan. This hearing will address housing and community development needs and development of proposed activities.
2. The second public hearing will be held during the 15-day public review period for the Annual Performance Report. This hearing will address a review of program performance.
3. Both public hearings are held during a regular meeting of the Alameda County Housing and Community Development Advisory Committee (HCDAC) which is made up of nine members appointed by the Alameda County Board of Supervisors.
4. All hearings will be held at times and locations convenient to potential and actual beneficiaries and will accommodate persons with disabilities. Notices for hearings will be published in one or more local newspapers of general circulation, and notices will be sent to interested parties, including, but not limited to: associations, non-profit organizations, and service providers.
5. There shall be a 30-day public review period during which citizens may comment on the Consolidated Plan or Action Plan. A public notice for the public review period will be published in one or more local newspapers of general circulation, and notices will be sent to interested parties, including, but not limited to: associations, non-profit organizations, and service providers.

6. Public notices will include a summary of the contents and purpose of the Consolidated Plan, annual Action Plan, or Annual Performance Report, and include a list of the locations where complete copies may be examined.
7. Summaries of the five-year Consolidated or annual Action Plan and Annual Performance Report will be available in formats accessible to persons with disabilities, upon request.
8. The five-year Consolidated or annual Action and Annual Performance Report will be made available at libraries, government offices and public places during the 30 or 15 day public review period, as applicable.
9. The five-year Consolidated or annual Action Plan and Annual Performance Report will be provided free-of-charge to a reasonable number of citizens and groups that request them.
10. Any comments or complaints of citizens received in writing, or orally at the public hearings shall be considered by the Alameda County HOME Consortium. A summary of the comments or complaints, and a summary of any comments or complaints not accepted and the reasons therefore, will be attached to the applicable document upon submission to HUD.
11. In May, during a regularly scheduled meeting of the Board of Supervisors, a public hearing will be held on the proposed Consolidated or Action Plan prior to final approval.
12. HCD will publish in the "Community Calendar" section of local newspapers, scheduled meeting dates of the HCDAC allowing for citizen comment throughout the program year.

B. Substantial Amendments to the Consolidated/Action Plans

Citizens will be given reasonable notice and an opportunity to comment on substantial amendments made to the Consolidated or Action Plan.

1. Public Notice and Review

- a) Alameda County HCD will issue a public notice on behalf of any HOME Consortium jurisdiction making a HOME Program substantial amendment to the Consolidated or Action Plan. All public notices shall describe the substantial amendment being proposed to the Consolidated or Action Plan.
- b) Each entitlement jurisdiction is required to issue a public notice for any substantial amendment to its CDBG Program -- an Affidavit of Publication must be forwarded to Alameda County HCD for Consolidated Plan records.

All public notices shall describe the substantial amendment being proposed to the Consolidated or Action Plan.

- c) Summaries of the public notice will be available in formats accessible to persons with disabilities, upon request.
- d) There will be a public review period of 30 days during which comments on the substantial amendment may be made before the amendment is implemented. Comments may be registered in writing or orally.
- e) Any comments or views of citizens received in writing or orally shall be considered by the Alameda County HOME Consortium. A summary of the comments or views, and a summary of any comments or views not accepted and the reasons therefor, will be attached to the substantial amendment upon submission to HUD. HCD staff will respond to all comments within fifteen (15) working days of their receipt, where practicable.

2. Criteria for Substantial Amendments

a) HOME Program

- 1) The Alameda County HOME Consortium shall have the authority to establish criteria for substantial amendments for the HOME Program.
- 2) Changes in the use of HOME funds from one eligible activity to another shall constitute a substantial amendment, subject to the requirements set forth under this section.

b) CDBG Programs

- 1) Individual CDBG entitlement jurisdictions shall establish criteria for substantial amendments for their individual CDBG Programs.

C. Eligible Activities Under the HOME Program and CDBG Program

1. HOME Program

- a) HOME funds may be used by a participating jurisdiction to provide incentives to develop and support affordable rental housing and home ownership affordability through the acquisition (including assistance to home buyers), new construction, reconstruction, or moderate or substantial rehabilitation of non-luxury housing with suitable amenities, including real property acquisition, site improvements, conversion, demolition, and other expenses, including financing costs, relocation expenses of any displaced persons, families, businesses, or organizations, to provide tenant-based rental assistance, including security deposits; to provide payment of reasonable

administrative and planning costs; and to provide for the payment of operating expenses of community housing development organization. The housing must be permanent or transitional housing, and includes permanent housing for disabled homeless persons, and single-room occupancy housing.

2. CDBG Programs

- a) Individual CDBG entitlement jurisdictions shall describe eligible activities under their individual CDBG Programs.

APPENDIX A

SUBSTANTIAL AMENDMENTS TO THE CITY OF PLEASANTON'S COMMUNITY DEVELOPMENT BLOCK GRANT (CDBG) PROGRAM

Criteria for Substantial Amendments to the Consolidated Plan or Action Plan

Changes in the use of CDBG funds from one eligible activity to another shall constitute a substantial amendment, subject to the requirements set forth under Section VIII of the Citizen Participation Plan.

Eligible Activities

Community Development Block Grant (CDBG) funds may be used to fulfill any of the following program objectives:

- 1) Maintain the housing stock by rehabilitating existing substandard housing for low and moderate income persons and the disabled.
- 2) Acquire/rehabilitate facilities providing programs for the benefit of low and moderate income persons.
- 3) Develop rental housing opportunities for low and moderate income households.
- 4) Promote economic development and neighborhood revitalization in target areas that will benefit low and moderate income persons.
- 5) Provide assistance for public service agencies benefiting primarily low and moderate income persons.
- 6) Provide public improvements in target areas.
- 7) Remove architectural barriers and improve physical access and mobility for the disabled.