



Memorandum

To: Human Relations Commission

From: Erum Maqbool, CDBG Staff Specialist

Date: November 6, 2020

Re: Recommendation to adopt the amended Community Development Block Grant (CDBG) Citizen Participation Plan

Recommendation:

Staff recommend the Human Relations Commission (HRC) recommend the City Council adopt the amended *Community Development Block Grant Citizen Participation Plan* required for the expenditure of funds from the U.S. Department of Housing and Urban Development (Attachment A).

Executive Summary:

The City of Palo Alto receives funds annually from the U.S. Department of Housing and Urban Development (HUD) as an entitlement city under the Community Development Block Grant (CDBG) program. As a jurisdiction that receives federal funds from HUD, the City is required to have a Citizen Participation Plan (CPP). Staff is proposing minor amendments to the existing CPP, which was last updated in 2010, to bring the document into alignment with the current HUD provisions. The amendments to the CPP provide for an expedited process for the City to allocate emergency CDBG funding, bring the CPP into compliance with current HUD regulations, and reflect general formatting updates. The proposed amended CPP and the 2010 CPP are attached for reference, with proposed text changes noted in the amended document (Attachment A).

Background:

The Citizen Participation Plan (CPP) is a required component of the CDBG program. The U. S. Department of Housing and Urban Development (HUD) requires CDBG recipient agencies to prepare and implement a CPP that provides adequate opportunity for citizens to participate in an advisory role in the planning, implementation and assessment of the CDBG program.

Existing 2010 CPP

The 2010 CPP details the public noticing process for the hearings and other opportunities for stakeholders to review and comment on the planning, implementation and assessment of the CDBG program. Additionally, the CPP states the process for public access to meetings including reasonable requests for accommodations for persons with disabilities and for non-English speaking residents.

The existing CPP is divided into sections covering roles and responsibilities for City Council, Human Relations Committee, staff, and the public, as well as two process related sections regarding substantial amendments and residential anti-displacement. Please review Attachment B for details.

Discussion:

The proposed CPP amendments are in response to the 2020 Coronavirus Aid, Relief, and Economic Security Act (CARES Act) and federal regulatory changes made in 2016. The urgency to complete the CPP amendments at this time is driven by the compelling circumstances related to the COVID-19 pandemic. The new requirements are discussed below and are reflected in Attachment A.

CARES Act

On March 27, 2020 the United States Congress passed the Coronavirus Aid, Relief, and Economic Security Act (CARES Act) to direct funds to state and local governments to prevent the spread and mitigate the economic impacts of COVID-19.

In order to expedite the use of CDBG funds to prevent and respond to COVID-19, HUD waived certain regulatory provisions regarding (1) the public comment period and (2) providing reasonable notice and opportunity to comment. These waivers apply to Consolidated Plan Amendments. In its guidance, HUD directed jurisdictions to make changes to their CPPs to be consistent with the waivers to acknowledge the ability to streamline lengthy processes in time of emergency.

Staff proposes amendments the CPP to allow for reduced noticing and comment periods during times of declared emergencies to expedite the receipt of emergency related CDBG funding, as well as to provide virtual meeting access. The authority to amend the CPP to allow these changes is granted by the CARES Act and by the HUD waivers issued for COVID-19 pandemic. The proposed amendments to the CPP will streamline the process and continue to provide access to information.

Public Notice Requirements

The current requirement for noticing for public hearings is 14 days. In the event of a local, state, and/or national emergency or disaster, the proposed amendment for the public notice period is five (5) days prior to the first public hearing. This notice period is consistent with HUD's provisions.

Public Comment Period

The existing CPP specifies a 30-day and 15-day public comment period depending upon the related action. The provision of a 30- or 15-day comment period promotes transparency and engagement but hinders the City's ability to respond quickly in times of emergency to meet the community's needs.

The current requirements:

- A 30-day public comment period is required prior to final adoption of the draft Consolidated Plan/draft Annual Action Plans, and draft substantial amendments to Consolidated Plan/Annual Action Plan.¹
- A 15-day public comment period is required prior to the submission of the Draft Consolidated Annual Performance and Evaluation Report (CAPER) to HUD.

As noted previously, HUD wants processes to be expedited during emergency conditions. To provide for this, the recommended public comment period in the event of a local, state, and/or national emergency or disaster is five (5) days.

Public Meeting Format

The current provisions in the CPP specifies for public hearings done as in-person events. To facilitate public engagement during emergency conditions, staff recommends modifying the CPP to allow virtual meetings. The City (grantee) may meet public hearing requirements 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.

Other Regulatory Updates

The existing CPP was last updated in October 2010. Since that time, there have been some minor regulatory changes that need to be reflected in the CPP. These changes pertain to high-speed internet/broadband access and climate change as reflected in the Code of Federal Register.

The federal regulations require that for consolidated plans submitted on or after January 1, 2018, jurisdictions will encourage outreach from both public and private organizations involved in bridging the digital divide and providing broadband service; in managing flood prone areas, public land, or resources; and emergency management agencies (81 Fed. Reg.91011, Dec. 16, 2016).

Policy Implications:

The proposed CPP amendments do not make any substantive changes to the City's existing public engagement policies. The amendments will make it easier for the City to act more expeditiously to allocate CDBG funds during declared emergency conditions.

¹ The Consolidated Plan is carried out through Annual Action Plans, which provide a concise summary of the actions, activities, and the specific federal and non-federal resources that will be used each year to address the priority needs and specific goals identified by the Consolidated Plan. An amendment to an Annual Action Plan is considered an amendment to the respective Consolidation Plan.

Stakeholder Engagement:

An advertisement was published in The Daily Post on October 29, 2020, announcing the availability of the draft CPP for public review and comment. The draft CPP was posted on the City's website and was made available for public review and comment from October 30, 2020 through November 16, 2020. Additionally, the notice also provided details of the HRC public hearing.

Next Steps:

The HRC recommendation will be forwarded to City Council for consideration on November 30, 2020.

Attachments:

Attachment A: Draft Citizen Participation Plan FY2020

Attachment B: Adopted Citizen Participation Plan FY2010

Attachments

Attachment A: Draft Citizen Participation Plan FY2020

Attachment B: Adopted Citizen Participation Plan FY2010



**COMMUNITY DEVELOPMENT
BLOCK GRANT (CDBG)
CITIZEN PARTICIPATION PLAN**



Administered by Planning and Development Services

Introduction

Pursuant to the requirements of 24 CFR 91.105, the City of Palo Alto hereby issues the following plan to provide for and encourage citizens to participate in the development of the City's Consolidated Plan, Annual Action Plan, any substantial amendments to the Consolidated Plan or Annual Action Plan, and the Performance reports (CAPER).

Community Development Block Grant (CDBG) Program

The City of Palo Alto receives an annual allocation of Community Development Block Grant (CDBG) funds directly from the U.S. Department of Housing and Urban Development (HUD). The CDBG program addresses the creation of viable urban communities by providing decent housing, a suitable living environment and the ability to expand economic opportunities, principally for persons of low and moderate income.

Consolidated Plan, Action Plan and Performance Report

In order to receive CDBG funding, Title I of the National Affordable Housing Act mandates the preparation of a strategic five-year **Consolidated Plan** that identifies priority housing and community development needs and sets forth a strategy to address those needs. An **Action Plan** is prepared annually to identify specific projects to be funded to implement the goals and objectives identified in the Consolidated Plan. A **Comprehensive Annual Performance and Evaluation Report (CAPER)** is prepared at the end of each program year to evaluate and report on the goals and objectives achieved with the annual grant allocations.

Citizen Participation Objectives

A primary objective of the Housing and Community Development Act of 1987 is the provision of adequate opportunities for citizens, non-profit organizations and other interested parties to review and comment on the planning, implementation and assessment of the CDBG program.

It is the intention of the City of Palo Alto to adopt and follow a detailed Citizen Participation Plan in order to encourage meaningful citizen involvement, public examination and appraisal of the process, as well as to enhance program accountability.

The Citizen Participation Plan includes the following objectives:

1. To adhere to the provisions of the Community Development Act of 1987, as amended, and all other federal regulations.
2. To encourage the participation of citizens in the planning, implementation and assessment of the CDBG program, especially those of low and very low income, members of minority groups, residents of areas where funds will be expended, persons with limited English proficiency, the elderly, individuals with disabilities, and other neighborhood, non-profit or civic groups.

3. To make information about the CDBG program and process available to the public through reasonable and timely access to information including publications in local newspapers, public hearings, public meetings, the City’s website, and the provision of technical assistance.

Citizen Participation Plan

The sections below describe the roles and responsibilities of the City Council, public, staff, and Human Relations Committee. Additionally, there are process-related clarifications for substantial amendments, anti-displacement requirements, and state of emergency conditions.

Part I: The City Council

1. The City Council sets policy, priorities, and approves the overall Community Development Block Grant allocations.
2. The City Council will conduct a minimum of two public hearing per **fiscal** year for the purpose of obtaining citizens’ views and formulating or responding to proposals and questions. The public hearings will be held at different stages of the program year. **The purpose of the public hearing is to address community development and housing needs, development of proposed activities, proposed strategies and actions for affirmatively furthering fair housing,** and program performance.
3. All public hearings will be held at times and locations convenient to potential and actual program beneficiaries, with reasonable accommodations for persons with disabilities. Generally, public hearings will be held at City Hall in the evenings because the facility is centrally located, accessible by public transportation, and has disabled access.
4. Translation services will be provided when a significant number of non-English speaking residents can be reasonably expected to participate, or when a reasonable request for such an accommodation is made.
5. Actions of the City Council will direct the implementation of CDBG funded projects.

Part II. The General Public

1. The general public is encouraged to participate in the various stages of the CDBG program by attending and commenting at the noticed public hearings. They are also encouraged to express their views and comments directly to the CDBG Coordinator in the **Planning and Development Services department.**
2. At any time, citizens may submit views concerning Palo Alto’s CDBG program performance to the **HUD Region IX Office at One Sansome Street, Suite 1200, San Francisco, CA 94104.**
3. The City’s website (<https://www.cityofpaloalto.org/>) contains either the **draft or adopted** Consolidated Plan, **draft** or adopted versions of the Annual Action Plans and Performance

Reports, the CDBG annual program timeline, and other pertinent program records, documents and information. Interested citizens are encouraged to review the material online, download files, and provide comments or suggestions via letter, or e-mail to the CDBG Coordinator.

4. Consistent with accessibility and reasonable accommodation requirements, in accordance with section 504 of the Rehabilitation Act of 1973 and the regulations at 24 CFR part 8; and the Americans with Disabilities Act and the regulations at 28 CFR parts 35 and 36, as applicable, upon request, materials and information will be made available in a format accessible to persons with disabilities. Persons with disabilities who require auxiliary aids or services in using City facilities, services or programs, or who would like information on the City's compliance with the Americans with Disabilities Act (ADA) of 1990 and Rehabilitation Act of 1973, may contact City of Palo Alto's ADA Coordinator at (650) 329-2550 (Voice) or by emailing ada@cityofpaloalto.org. Public hearings will be held in the Council Chambers or other accessible locations. Requests for assistance or accommodations should be submitted as soon as possible but no later than 48 hours in advance of a scheduled meeting, program, or service.

Part III. City Planning Staff

1. The Planning and Development Services department has the primary responsibility for the administration and coordination of the CDBG program.
2. The planning process for the CDBG program is conducted on a two-year cycle and is coordinated with the City's Human Service Resource Allocation Process. At the beginning of each fiscal year, staff will provide the general public, public agencies, interested citizens, and the Human Relations Commission (HRC) with the following information:
 - (a) The amount of grant funds and program income expected to be made available during the next fiscal/program year for proposed community development and housing activities;
 - (b) The range of activities that may be undertaken, including the estimated amount proposed to be used for activities that will benefit persons of low and moderate income;
 - (c) The proposed CDBG activities which will likely result in relocation, and the City's intent to minimize the necessity for relocation of persons as a result of assisted activities; and
 - (d) The types and levels of assistance the City will make available (or require others to make available) to persons who are eligible for relocation assistance as a result of CDBG assisted activities.
3. Planning staff will publish a summary of the proposed Consolidated Plan/Annual Action Plan in newspaper of local circulation and on the City of Palo Alto's CDBG webpage. The summary will describe the contents and purpose of the Consolidated Plan and include a list of the locations where copies of the draft Consolidated Plan may be examined, and where it is

available on the City's website. In the summary, the City will make available to residents, public agencies, and other interested parties information that includes the amount of assistance the City 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.

4. A reasonable number of free copies of the Draft Consolidated Plan/Annual Action Plan will be provided to citizens and groups that request it. Draft copies will be available at the Downtown Library, City Hall/Planning and Development Services, and the Development Center. The draft documents will also be available on the City's CDBG webpage. Citizens may submit comments on the Consolidated Plan/Annual Action Plan during a public review period of no less than 30 days.
5. Planning staff will maintain a mailing list of interested parties, who will be mailed or e-mailed information regarding public hearings or meetings, the availability of draft plans, substantial amendments, public comment periods, and other announcements. Members of the City's Human Relations Commission will also receive this information.
6. To encourage a wider range of citizen participation during the development of the Consolidated Plan, the list of interested parties will be extended to include local and regional institutions and other organizations such as businesses, developers, community and faith-based organizations, residents of public and assisted housing developments, persons receiving tenant-based rental assistance, the Housing Authority of Santa Clara County, and neighboring jurisdictions. In addition, the City will encourage participation of both public and private organizations, including broadband internet service providers, organizations engaged in narrowing the digital divide (e.g., schools, digital literacy organizations), and agencies whose primary responsibilities include the management of flood prone areas, public land or water resources, and emergency management agencies (81 Fed. Reg.91011, Dec. 16, 2016).
7. Staff will provide adequate, timely notification of hearings and meetings so that citizens and other interested parties may attend and comment. Where feasible, a minimum of 14 days notice will be provided for all public hearings regarding the CDBG Program. When possible, an ad will be placed in a local newspaper. All meetings and hearings will be noticed on the City of Palo Alto's CDBG webpage.
8. Upon completion of the draft Consolidated Annual Performance Reports (CAPER), Planning staff will publish a notice in a newspaper of general circulation and on the City of Palo Alto's CDBG webpage announcing the availability of the draft performance report, the locations where it may be reviewed, and a 15 day period for submitting public comments prior to its submission to HUD. Any comments or views of citizens received in writing or at public meetings in preparing the performance report shall be considered, summarized and attached to the performance report.
9. The Consolidated Plan/Action Plans as adopted, any substantial amendments, the performance reports and the Citizen Participation Plan will be available to the public on the

City's CDBG webpage, and upon request. Reasonable accommodations will be provided for requests for materials or information by persons with disabilities.

10. Planning staff will arrange for reasonable and timely access to public records related to the Citizens' Participation Plan, the Consolidated Plan, the Action Plans, Consolidated Annual Performance and Evaluation Report (CAPER), any amendments thereto, and the City's use of CDBG funds during the preceding five years. Access to public records will be provided to citizens, public agencies, and other interested parties upon written or verbal request. An appointment may be required to view records, and a fee may be charged for copies to recover costs. Documents are available for public review in the **Planning Division** during advertised working hours.
11. Upon request, staff will provide technical assistance to community groups and groups representing individuals of low- and moderate-income in developing funding proposals for assistance under the Consolidated Plan. Staff will endeavor to provide assistance in the form of general information, relevant demographic or socio-economic data, interpretation of HUD rules and regulations, explanation of City policies and procedures affecting the CDBG program, or advice regarding funding proposals or alternative funding sources for projects which are ineligible under the CDBG program.
12. Planning staff will arrange for information to be presented in a bilingual fashion at public hearings whenever a significant number of non-English speaking residents can be expected to participate, or when a reasonable request is made for such a service.
13. Where practicable, planning staff will provide a timely, substantive written response to all written complaints and grievances regarding the CDBG program within 15 working days of receipt of such complaint or grievance.
14. Planning staff will schedule and notice all required public hearings. Notice of the date, time, place and agenda of the public hearings will be advertised at least 14 days prior to the hearing in a **newspaper of local circulation and on the City's CDBG webpage.**

Part IV. The Human Relations Commission

1. The City's Human Relations Commission (HRC) is charged with the discretion to act with respect to any human relations matter when the **HRC** finds that any person or group does not benefit fully from public or private opportunities or resources in the community, or is unfairly or differently treated due to factors of concern to the Commission.
2. In order to coordinate the City's Human Service Resource Allocation Process (HSRAP) with the CDBG allocation process, the HRC will hold at least one public hearing annually to review and comment on the proposed CDBG funding allocations.

Part V. Substantial Amendments

1. Prior to the submission of any substantial change in the Consolidated Plan or proposed use of funds, **residents of the community and** interested citizens will be notified and provided a minimum of 30 days to comment on the proposed changes before the amendment is

implemented. The City Council will hold noticed public hearings on substantial changes where interested persons may comment. All views and comments submitted in writing, or orally at public hearings will be considered in preparing the substantial amendment. A summary of these comments, and a summary of any comments or views not accepted and the reasons, therefore, will be attached to the substantial amendment.

2. Substantial amendments are defined as:

- (a) A change in the use of CDBG funds from one eligible activity to another;
- (b) The implementation of an activity not previously identified in sufficient detail to provide affected citizens an opportunity to submit comments; or
- (c) A change in an activity's program budget which exceeds ten percent of the City's latest annual entitlement grant.

Part VI. Anti-Displacement Policy

1. The City of Palo Alto will comply with all federal regulations governing residential anti-displacement and relocation assistance as they pertain to the CDBG program.
2. It is the City's policy to avoid, to the greatest extent feasible, the involuntary displacement of any persons, property or businesses as a result of a federally funded CDBG activity such as acquisition, demolition or rehabilitation.
3. The City will take all reasonable steps to minimize involuntary displacement as a result of CDBG activity by approving and designing activities in such a way that displacement is avoided whenever possible. In extraordinary circumstances where no feasible alternatives to displacement are available if the City's community development objectives are to be met, the City will (or will require others to) properly notice and inform residents or tenants of their rights and potential eligibility for relocation benefits.
4. When there is no alternative to displacement, relocation benefits will be provided to all eligible persons in accordance with the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended (URA) and the requirements of 24 CFR 570.606(b) and 24 CFR 570.606(c) governing the Residential Anti-displacement and Relocation Assistance Plan under Section 104(d) of the HUD Act.

Part VII. Citizen Participation Requirements in State of Emergency

The City shall comply with all HUD memorandums and notices that direct citizen participation requirements in the event of a local, state, or national emergency or disaster. These requirements shall supersede any conflicting provisions of the Citizen Participation Plan. Following the HUD standards will allow the City to respond in the most expeditious manner to secure and access new HUD funding and/or re-allocate existing funding.



CITY OF PALO ALTO

**COMMUNITY DEVELOPMENT BLOCK GRANT (CDBG)
CITIZEN PARTICIPATION PLAN**

**Administered by the
Department of Planning and Community Environment
250 Hamilton Avenue
Palo Alto, CA 94301
Curtis Williams, Director**

**Public Review and Comment Period:
September 17 – October 18, 2010**

Adopted by City Council on October 18, 2010

**For Additional Information Contact:
Suzanne Bayley, Interim CDBG Coordinator
(650) 329-2428; e-mail: Suzanne.bayly@cityofpaloalto.org
Steven Turner, Advanced Planning Manager
(650) 329-2108; e-mail: steven.turner@cityofpaloalto.org**

Introduction

Community Development Block Grant (CDBG) Program

The City of Palo Alto receives an annual allocation of Community Development Block Grant (CDBG) funds directly from the U.S. Department of Housing and Urban Development (HUD).

The CDBG program addresses the creation of viable urban communities by providing decent housing, a suitable living environment and the ability to expand economic opportunities, principally for persons of low and moderate income.

Consolidated Plan, Action Plan and Performance Report

In order to receive CDBG funding, Title I of the National Affordable Housing Act mandates the preparation of a strategic five-year ***Consolidated Plan*** that identifies priority housing and community development needs, and sets forth a strategy to address those needs. An ***Action Plan*** is prepared annually to identify specific projects to be funded to implement the goals and objectives identified in the Consolidated Plan. A ***Comprehensive Annual Performance and Evaluation Report (CAPER)*** is prepared at the end of each program year to evaluate and report on the goals and objectives achieved with the annual grant allocations.

Citizen Participation Objectives

A primary objective of the Housing and Community Development Act of 1987 is the provision of adequate opportunities for citizens, non-profit organizations and other interested parties to review and comment on the planning, implementation and assessment of the CDBG program.

It is the intention of the City of Palo Alto to adopt and follow a detailed Citizen Participation Plan in order to encourage meaningful citizen involvement, public examination and appraisal of the process, as well as to enhance program accountability. The Citizen Participation Plan will include the following objectives:

1. To adhere to and comply with the provisions of the Community Development Act of 1987, as amended, and all other federal regulations.
2. To encourage the participation of citizens in the planning, implementation and assessment of the CDBG program, especially those of low and very low income, members of minority groups, residents of areas where funds will be expended, persons with limited English proficiency, the elderly, individuals with disabilities, and other neighborhood, non-profit or civic groups.
3. To make information about the CDBG program and process available to the public through reasonable and timely access to information including publications in local newspapers, public hearings, public meetings, the City's website, and the provision of technical assistance.

City of Palo Alto Citizen Participation Plan

Part I. The City Council

1. The City Council sets policy, priorities, and approves the overall Community Development Block Grant allocations.
2. The City Council will hold a minimum of two public hearings per year for the purpose of obtaining citizens' views and formulating or responding to proposals and questions. The public hearings will be held at different stages of the program year so that together they address community development and housing needs, development of proposed activities and program performance.
3. At least one public hearing will be held before a draft Consolidated Plan is published for comment.
4. All public hearings will be held at times and locations convenient to potential and actual program beneficiaries, with reasonable accommodations for persons with disabilities. Generally, public hearings will be held at City Hall in the evenings because the facility is centrally located, accessible by public transportation, and has disabled access.
5. Translation services will be provided when a significant number of non-English speaking residents can be reasonably expected to participate, or when a reasonable request for such an accommodation is made.
6. Actions of the City Council will direct the implementation of CDBG funded projects.

Part II. The General Public

1. The general public is encouraged to participate in the various stages of the CDBG program by attending and commenting at the noticed public hearings. They are also encouraged to express their views and comments directly to the CDBG Coordinator in the Planning Division, or receive program information from the Planning Staff, on the 5th floor of City Hall, 250 Hamilton Avenue, Palo Alto, CA 94301.
2. At any time, citizens may submit views concerning Palo Alto's performance in the CDBG program to the HUD Area Office at 600 Harrison Street, San Francisco, CA 94107-1300.
3. The City's website (cityofpaloalto.org) contains the adopted Consolidated Plan, and either the approved or draft versions of the Annual Action Plans and Performance Reports, the CDBG annual program timeline, and other pertinent program records, documents and information. Interested citizens are encouraged to review the material on

line, download files, and provide comments or suggestions via letter, or e-mail to the CDBG Coordinator.

4. Upon request, materials and information will be made available in a format accessible to persons with disabilities. Persons with disabilities who require auxiliary aids or services in using City facilities, services or programs, or who would like information on the City's compliance with the Americans with Disabilities Act (ADA) of 1990, may contact Larry Perlin, ADA Director, City of Palo Alto, 250 Hamilton Avenue, Palo Alto, CA 94301; (650) 329-2550 (Voice) or (650) 329-1199 (TDD); or larry.perlin@cityofpaloalto.org. Public hearings will be held in the Council Chambers or other accessible locations. Sign language interpreters will be provided upon request with 72 hours advance notice.

Part III. City Planning Staff

1. The Department of Planning and Community Environment has the primary responsibility for the administration and coordination of the CDBG program.
2. The planning process for the CDBG program is conducted on a two-year cycle, and is coordinated with the City's Human Service Resource Allocation Process. At the beginning of each fiscal year, staff will provide the general public, public agencies, interested citizens, and the Human Relations Commission (HRC) with the following information:
 - a) The amount of grant funds and program income expected to be made available during the next fiscal/program year for proposed community development and housing activities;
 - b) The range of activities that may be undertaken, including the estimated amount proposed to be used for activities that will benefit persons of low and moderate income;
 - c) The proposed CDBG activities which will likely result in relocation, and the City's intent to minimize the necessity for relocation of persons as a result of assisted activities;
 - d) The types and levels of assistance the City will make available (or require others to make available) to persons who are eligible for relocation assistance as a result of CDBG assisted activities.
3. Planning staff will publish a summary of the proposed Consolidated Plan/Annual Action Plan in the Palo Alto Weekly or other newspaper of local circulation. The summary will describe the contents and purpose of the Consolidated Plan and include a list of the locations where copies of the draft Consolidated Plan may be examined, and where it is available on the City's website.

4. A reasonable number of free copies of the Draft Consolidated Plan/Annual Action Plan will be provided to citizens and groups that request it. Draft copies will be available at the Downtown Library, City Hall Department of Planning and Community Environment and the City's Development Center located at 285 Hamilton Ave, Palo Alto. The draft documents will also be available on the City's website. Citizens may submit comments on the Consolidated Plan/Annual Action Plan during a public review period of not less than 30 days.
5. Planning staff will maintain a mailing list of interested parties, who will be mailed or e-mailed information regarding public hearings or meetings, the availability of draft plans, substantial amendments, public comment periods, and other announcements. Members of the City's Human Relations Commission will also receive this information.
6. To encourage a wider range of citizen participation during the development of the Consolidated Plan, the list of interested parties will be extended to include local and regional institutions and other organizations such as businesses, developers, community and faith-based organizations, residents of public and assisted housing developments, persons receiving tenant-based rental assistance, the Housing Authority of Santa Clara County, and neighboring jurisdictions.
7. Staff will provide adequate, timely notification of hearings and meetings so that citizens and other interested parties may attend and comment. Where feasible, a minimum of 14 days notice will be provided for all public meetings regarding the CDBG Program. When possible, an ad will be placed in the Palo Alto Weekly, or other local newspaper. All meetings and hearings will be noticed on the electronic City Hall Meeting Calendar.
8. Upon completion of the draft Consolidated Annual Performance Reports (CAPER), Planning staff will publish a notice in the Palo Alto Weekly, or another newspaper of general circulation, announcing the availability of the draft performance report, the locations where it may be reviewed, and a 15 day period for submitting public comments prior to its submission to HUD. Any comments or views of citizens received in writing or at public meetings in preparing the performance report shall be considered, summarized and attached to the performance report.
9. The Consolidated Plan/Action Plans as adopted, any substantial amendments, the performance reports and the Citizen Participation Plan will be available to the public on the City's website, and upon request. Reasonable accommodations will be provided for requests for materials or information by persons with disabilities.
10. Planning staff will arrange for reasonable and timely access to public records related to the Citizens' Participation Plan, the Consolidated Plan, the Action Plans, Consolidated Annual Performance and Evaluation Report (CAPER), any amendments thereto, and the City's use of CDBG funds during the preceding five years. Access to public records will be provided to citizens, public agencies, and other interested parties upon written or verbal request. An appointment may be required to view records, and a fee may be charged for copies to recover costs. Documents are available for public review in the

Planning Division, 5th floor, Civic Center, 250 Hamilton Avenue, Palo Alto, CA 94301, during advertised working hours.

11. Upon request, staff will provide technical assistance to community groups and groups representing individuals of low- and moderate-income in developing funding proposals for assistance under the Consolidated Plan. Staff will endeavor to provide assistance in the form of general information, relevant demographic or socio-economic data, interpretation of HUD rules and regulations, explanation of City policies and procedures affecting the CDBG program, or advice regarding funding proposals or alternative funding sources for projects which are ineligible under the CDBG program.
12. Planning staff will arrange for information to be presented in a bilingual fashion at public hearings whenever a significant number of non-English speaking residents can be expected to participate, or when a reasonable request is made for such a service.
13. Where practicable, planning staff will provide a timely, substantive written response to all written complaints and grievances regarding the CDBG program within 15 working days of receipt of such complaint or grievance.
14. Planning staff will schedule and notice all required public hearings. Notice of the date, time, place and agenda of the public hearings will be advertised at least 14 days prior to the hearing in the Palo Alto Weekly, or another newspaper of local circulation.

Part IV. The Human Relations Commission

1. The City's 7-member Human Relations Commission (HRC) is charged with the discretion to act with respect to any human relations matter when the Commission finds that any person or group does not benefit fully from public or private opportunities or resources in the community, or is unfairly or differently treated due to factors of concern to the Commission.
2. In order to coordinate the City's Human Service Resource Allocation Process (HSRAP) with the CDBG allocation process, the HRC will hold at least one public hearing annually to review and comment on the proposed CDBG funding allocations.

Part V. Substantial Amendments

1. Prior to the submission of any substantial change in the Consolidated Plan or proposed use of funds, interested citizens will be notified and provided a minimum of 30 days to comment on the proposed changes before the amendment is implemented. The City Council will hold noticed public hearings on substantial changes where interested persons may comment. All views and comments submitted in writing, or orally at public hearings will be considered in preparing the substantial amendment. A summary of these comments, and a summary of any comments or views not accepted and the reasons therefore, will be attached to the substantial amendment.

2. Substantial amendments are defined as:
 - a) changes in the use of CDBG funds from one eligible activity to another
 - b) The implementation of an activity not previously identified in sufficient detail to provide affected citizens an opportunity to submit comments, or
 - c) A change in an activity's program budget which exceeds ten percent of the City's latest annual entitlement grant.

Part VI. Anti-Displacement Policy

1. The City of Palo Alto will comply with all federal regulations governing residential anti-displacement and relocation assistance as they pertain to the CDBG program.
2. It is the City's policy to avoid, to the greatest extent feasible, the involuntary displacement of any persons, property or businesses as a result of a federally funded CDBG activity such as acquisition, demolition or rehabilitation.
3. The City will take all reasonable steps to minimize involuntary displacement by approving and designing activities in such a way that displacement is avoided whenever possible. In extraordinary circumstances where no feasible alternatives to displacement are available if the City's community development objectives are to be met, the City will (or will require others to) properly notice and inform residents or tenants of their rights and potential eligibility for relocation benefits.
4. When there is no alternative to displacement, relocation benefits will be provided to all eligible persons in accordance with the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended (URA) and the requirements of 24 CFR 570.606(b) and 24 CFR 570.606(c) governing the Residential Anti-displacement and Relocation Assistance Plan under Section 104(d) of the HUD Act.