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I. INTRODUCTION

The following Citizen Participation Plan provides a framework and process by which the County’s consolidated planning efforts comply with the citizen participation requirements of the U.S. Department of Housing and Urban Development (HUD). This Citizen Participation Plan is prepared and implemented in accordance with the guidance provided in HUD Regulations 24 CFR Part 91.105.

This Citizens Participation Plan supersedes and replaces all previous plans adopted or amended for the Community Development Block Grant (CDBG), Home Investment Partnerships (HOME), and the Emergency Solutions Grant (ESG) programs.

The County of Riverside receives annual grant funding from HUD for the CDBG, HOME, and the ESG programs. The Citizen Participation Plan is a component of: the five-year Consolidated Plan; each subsequent Annual Action Plan; each year’s Consolidated Annual Performance and Evaluation Report; and any Substantial Amendments to the Consolidated Plan or its five Annual Action Plans. It is policy of the County to ensure adequate citizen involvement, with particular emphasis on participation by low- and moderate-income persons, in the planning, implementation, and evaluation of its housing and community development programs.

II. The Citizen Participation Plan for the County of Riverside addresses each of the following elements:

A. Participation

It is the policy of the County of Riverside to encourage and facilitate the wide-range participation of residents, service providers, government agencies, and other stakeholders in the development of all CPD required consolidated planning documents including the Five-Year Consolidated Plan, annual Action Plans, Substantial Amendments, and the Consolidated Annual Performance and Evaluation Report (CAPER).

The primary purpose of the participation will be in needs identification, priority setting, funding allocations, and program recommendations related to the consolidated planning process. The County shall provide for and encourage citizen participation with particular emphasis on: low- and moderate-income persons; persons residing in predominantly low- and moderate-income neighborhoods; persons residing in slum and blighted areas; and persons residing in areas where the use of CPD funds is being proposed.

The primary purpose and intent of HUD’s CPD programs covered by this Citizen Participation Plan is to empower residents and improve communities by providing decent and affordable housing, a suitable living environment, and sustainable economic opportunities. The County encourages the participation of all its citizens, including minorities and non-English speaking persons, as well as persons with disabilities.

Note: Although the term “citizen” is used in the Citizens Participation Plan for consistency with the statutory language (i.e., “Citizens Participation Plan”), Riverside County welcomes and solicits input from all county residents regardless of their citizenship or right-to-work status.
Meeting the Needs of Non-English Speaking Persons

Throughout the unincorporated areas of Riverside County, there are significant populations of monolingual, Spanish-speaking persons residing in many of the very low, low, and moderate-income communities. For local Citizen Participation (CP) meetings and other public events in areas with considerable non-English speaking populations, translators can be provided and meeting materials made available in both English and Spanish. Whenever feasible, the County also utilizes Spanish radio stations, websites, flyers, brochures, and newspapers to announce the schedule of CP meetings. The County makes every effort to ensure that Limited English Proficient (LEP) persons have meaningful access to federally funded programs and services as is required under Title VI of the Civil Rights Act of 1964.

Access for Persons with Disabilities

It is the policy of Riverside County that there shall be no discrimination against persons because of race, religion, age, creed, color, sex, disability, sexual orientation, national origin, marital status, veteran’s status or political belief or affiliation and that equal opportunity and access to facilities shall be available to all. The County is committed to providing equal access in its programs, services, and activities for persons with disabilities. Special accommodations or materials in alternative format, under the Americans with Disabilities Act, are available upon request. In addition, accommodations will be made, upon request, for attendees who are either visually or hearing impaired. Requests must be made at least 72 hours prior to meeting. Later requests will be accommodated to the extent feasible. Please call the Clerk of the Board office at (951) 955-1069, from 8:00 a.m. to 5:00 p.m., Monday through Friday or the ADA information line at (800) 514-0301 (voice) or (800) 514-0383 (TTY).

B. Public Hearings

The County is required to conduct at least two public hearings per year to obtain the views and comments of residents, service providers, government agencies, and other stakeholders regarding the County’s CPD-funded programs. The hearings generally address housing, social, and community development needs; proposed activities; and the review of program performance. The hearings will be conducted at a minimum of two different stages in the program year - at least one of these hearings must be held prior to the adoption of the proposed Consolidated Plan and/or annual One Year Action Plan (March-April). The second public hearing is usually conducted later in the year and focuses upon the results reported to HUD in the Consolidated Annual Performance and Evaluation Report (CAPER). On the day of the public hearing, comments may be submitted in writing or made orally to the Board of Supervisors at the public hearing.

The hearings will be held at times and locations convenient to potential and actual beneficiaries, with reasonable accommodation for persons with disabilities and non-English speaking residents.

The Cooperating Cities that participate in the County’s CPD program are required to conduct their own Citizen Participation activities for their residents, especially low and moderate-income residents. At a minimum, these cities will publicly notice and hold at least one public meeting to discuss proposed uses of city’s Community Planning and Development grant fund allocation.
Cities are required to submit copies of public notices, agendas, and minutes of such meetings to the County as part of the annual CDBG application process.

C. Public Notices

All consolidated planning public hearings will be publically noticed for a period not less than thirty (30) calendar days in advance of the hearing date and at the beginning of official public comment periods. The notices will be published either as public notices or advertisements in one or more newspapers of general circulation serving the community of affected citizens. In areas where the County has determined that there is a substantial non-English speaking population within its jurisdiction, the hearing notice will be published in English and in the appropriate language(s). The notices will provide details concerning the nature of the public hearing, applicable HUD regulations, date and time of the hearings, and other necessary information. Public notices will also be posted on the Economic Development Agency’s website (www.rivcoeda.org) and referenced through press releases.

The County will also follow the above public noticing process for other “non-public hearing” CPD related actions to be taken by the Board of Supervisors. These actions include Substantial Amendments to the Consolidated Plan or Action Plans.

D. Access to Meetings

It is the policy of the County to plan and conduct public meetings, also known as Citizen Participation (CP) meetings, related to the Consolidated Plan and annual Action Plans in unincorporated communities. These meetings shall be held at times and locations convenient to potential and actual program beneficiaries. In most cases, these CP meetings are conducted as part of regularly scheduled meeting of another community-based entity (e.g., Community Council or Municipal Advisory Council (MAC). It has been the County’s experience that the use of an existing community-based forum for the Citizen Participation Meetings ensures acceptable turn-out of residents, service providers, government officials, and other stakeholders. Citizens are invited to attend the meetings to learn about the programs and services available to them, express their views on their community’s housing and community development needs, prioritize community needs, and comment on prior program performance. Attendees are also given the opportunity to complete the Needs Assessment Surveys, provided in English and Spanish, during the meetings or return them later. Prior to the Public Meetings, County-wide notices are published in one or more newspapers of general circulation, in the appropriate languages, announcing the purpose, date, time, and location of the meetings. In addition, accommodations will be made, upon request, for attendees with disabilities.

E. Public Comments

It is the policy of the County to provide residents, service providers, government agencies, and other stakeholders a sufficient time period (not less than thirty (30) days) to review and comment on proposed consolidated plan, annual action plans, and substantial amendments. All public notices advise interested persons of the process to submit comments and obtain additional information regarding the proposed action. All CPD documents include a summary of all related comments received during the public comment period.
F. **Strategic Plan Development**

Public meetings and hearings will be held to provide information and to obtain the views, concerns, ideas, and thoughts of residents and service providers during the development of the Consolidated Plan. It is the County’s intention that the meetings and hearing be held with representatives of participating cities, agencies, organizations, and interested persons. During the preparation of the Annual Action Plan, meetings are held to consider the Urban County Program’s short-term regional strategy for the use of federal funds.

The following program information is provided to the public:

a. The estimated amount of funds available to the Urban County Program for community development and housing activities;
b. The eligible program activities that may be undertaken with these funds;
c. The unincorporated areas and locations proposed for utilizing the available funding; and
d. The proposed allocation of federal funds to participating non-profit organizations, Cities, and unincorporated areas, and basic eligible program categories and proposed funding allocations for local funding programs.

G. **Substantial Amendments**

From time-to-time, it may be necessary for the County to process a “substantial amendment” to the Five Year Consolidated Plan or the One Year Action Plans to allow for new CDBG, ESG, or HOME-funded activities; modification of existing activities; or other CPD program administrative actions.

Any proposed amendment that is considered a “substantial amendment” is subject to the Citizen Participation process, requires formal action by the Board of Supervisors, and approval by HUD. A thirty (30) day public notice is published to provide the opportunity for the public to review and comment on the proposed substantial amendments. The County will consider all comments or views received from the public concerning proposed substantial amendments in accordance with 24 CFR 91.105 (c)(3). A summary of these comments and views, including comments or views not accepted (and the reason why) shall be attached to the substantial amendment.

The County of Riverside is required by HUD [24 CFR 91.505 (b)] to identify the criteria to be used in determining if a proposed action will be considered a **Substantial Amendment**. The following criteria will be used by the County – if any one criterion applies, a substantial amendment will be required:

1. A new activity not previously listed and described in the Consolidated Plan/One-Year Action Plan;

2. When a proposal is made to amend the description of an existing activity in such a way that the newly described purpose, scope, location, or beneficiaries differ significantly from the original activity’s purpose, scope, location, or beneficiaries; or

3. An increase in the amount of CPD funds allocated to an existing activity when the following apply:
a. an increase in funding for a CDBG public service-type activity in an amount greater than $75,000, or a 100% increase over the current funded amount, whichever is greater;

b. an increase in funding for an Emergency Solutions Grant activity in an amount greater than $75,000, or a 100% increase over current funded amount, whichever is greater; or

c. an increase in the funding for other activities (public facility improvements, code enforcement, acquisition, etc.) in an amount greater than $700,000, or a 100% increase over current funded amount, whichever is greater.

d. an increase in the funding for HOME eligible activity in an amount greater than $500,000, or a 50% increase over the current funded amount, but never to exceed $500,000.

In an effort to efficiently utilize CDBG/HOME funds, the County will consider the reprogramming of unspent CDBG/HOME balances from completed and cancelled CDBG/HOME-funded activities to other eligible activities. In the event that any of these “administrative” reprogramming actions fall under the “substantial amendment” criteria, the proposed actions are subject to the Citizen Participation process, requires formal action by the Board of Supervisors, and approval by HUD.

The County will maintain and provide for public review a Reprogramming Action File that provides details for every reprogramming action (formal and administrative) taking place during the program year.

The County will submit Substantial Amendments to HUD on an annual basis including all pertinent documentation. 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 annual Consolidated Annual Performance and Evaluation Report (CAPER), which is made available to the public.

**Amendment to Citizen Participation Plan**

During the County’s administration of the CPD programs, it may become necessary to amend the Citizen Participation Plan. Any proposed amendment to the Citizen Participation Plan requires a thirty-day public notice, formal action by the Board of Supervisors, and approval by HUD.

**H. Access to Information**

The County shall provide opportunities for residents, public agencies, and other interested parties, including those most affected, with reasonable and timely access to information and records relating to the jurisdiction’s consolidated plan, as well as the proposed, actual, and past use of funds covered by this Citizen Participation Plan.
Standard documents will be available for public review at the County of Riverside, Economic Development Agency current address location and their web site, (www.rivcoeda.org). These materials will also be available in a form accessible to persons with disabilities, upon request. Comments, questions, or suggested amendments should be directed to the CDBG Program Administrator at (951) 955-8916.

Standard program documents that shall be made accessible for public review and comment throughout the preparation process include: the proposed and final Consolidated Plan; Annual Action Plan; Consolidated Annual Performance Report (CAPER); Substantial Amendments; and this Citizen Participation Plan.

It is the policy of the County of Riverside to maintain and provide access to all applicable and appropriate records pertaining to the administration of the CDBG, ESG, and HOME programs. Records retention is a component of the County’s CPD Program File Management System. Accordingly, the County will maintain and provide access to documentation and records for a period of five (5) years. Current copies of all major documents related to the current Consolidated Plan and related Consolidated Annual Performance and Evaluation Report (CAPER) will be posted on the County’s Web site at www.eda.org. Copies may be requested in person, by mail, email or by telephone. Program records maintained on file, or requiring research and compilation, shall be provided within a reasonable time period upon receipt of a written request, which specifically states the information desired.

This paragraph 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.

Most reasonable requests shall be filled at no cost to the public. Administering agencies reserve 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 documentation.

I. RESIDENTIAL ANTIDISPLACEMENT AND RELOCATION ASSISTANCE POLICY HOME PROGRAM [24 CFR 42.325 and 91.353]

The County of Riverside will replace all occupied and vacant “occupiable” lower-income housing demolished or converted to a use other than lower-income housing in connection with a project assisted with funds provided under the HOME Investment Partnership Act.

All replacement housing will be provided within three years after the commencement of the demolition or conversion. Before entering into a contract committing the County of Riverside to provide funds for a project that will directly result in demolition or conversion, the County of Riverside will make public by publication in a newspaper of general circulation and submit to HUD the following information in writing:

1. A description of the proposed assisted project;

2. The address, number of bedrooms, and location on a map of lower income housing that will be demolished or converted to use other than as lower income housing as a result of an assisted project;
3. A time schedule for the commencement and completion of the demolition or conversion;

4. To the extent known, the address, number of bedrooms and location on a map of the replacement housing that has been or will be provided.

5. The source of funding and a time schedule for the provision of the replacement housing;

6. The basis for concluding that the replacement housing will remain lower income housing for at least 10 years from the date of initial occupancy;

7. Information demonstrating that any proposed replacement of housing units with smaller dwelling units (e.g., a 2-bedroom unit with two 1-bedroom units), or any proposed replacement of efficiency or single-room occupancy (SRO) units with units of a different size, is appropriate and consistent with the housing needs and priorities identified in the approved Consolidated Plan.

To the extent that the specific location of the replacement housing and other data in items 4 through 7 are not available at the time of general submission, the County of Riverside will identify the general location of such housing on a map and complete the disclosure and submission requirements as soon as the specific data are available.

The Economic Development Agency is responsible for tracking the replacement of lower income housing and ensuring that it is provided within the required period. The Owner/Developer will be responsible for providing relocation payments and other relocation assistance to any lower income person displaced by the demolition of any housing or the conversion of lower income housing to another use.

Consistent with the goals and objectives of activities assisted under the Act, the County of Riverside will take the following steps where appropriate to minimize the direct and indirect displacement of persons from their homes:

1. Coordinate code enforcement with rehabilitation and housing assistance programs.

2. Evaluate housing codes and rehabilitation standards in reinvestment areas to prevent undue financial burden on established owners and tenants.

3. Stage rehabilitation of apartment units to allow tenants to remain in the building/complex during and after the rehabilitation, working with empty units first.

4. Arrange for facilities to house persons who must be relocated temporarily during rehabilitation.

5. Adopt policies to identify and mitigate displacement resulting from intensive public investment in neighborhoods.

6. Adopt policies which provide reasonable protections for tenants faced with conversion to a condominium or cooperative.
7. Adopt tax assessment policies, such as deferred tax payment plans, to reduce impact of increasing property tax assessments on lower income owner-occupants or tenants in revitalizing areas.

8. Establish counseling centers to provide homeowners and tenants with information on assistance available to help them remain in their neighborhood in the face of revitalization pressures.

J. Performance Reports

Each fiscal year the County is required to provide a sufficient time period (not less than fifteen (15) days) for review and comment on the proposed Consolidated Annual Performance and Evaluation Report (CAPER) based on the previous program year. The information compiled in this document is necessary to assess the progress on funding received by the County, participating/metro cities, non-profits, and other agencies or organizations. Data gathered in the compilation of the annual report will be used to supply information to HUD and the public on the accomplishments and services provided. The information will include the number of people served, ethnicity, income category, objective and outcome, and type of service received, as well as the current status on housing, public facilities and improvements, and other projects. The information is also used to determine future funding considerations. A copy of the CAPER will be available at EDA for review and can be located on the following web site: www.rivcoeda.org. The CAPER shall be submitted to HUD within ninety (90) days after the end of the program year and prior to September 30 of each year. Final reporting documents will also be made available to any interested parties upon request.

The second public hearing (See Section B) is usually conducted later in the year and is based on a summary of results reported to HUD in the Consolidated Annual Performance and Evaluation Report (CAPER). A 30-day public notice is published in one or more newspapers of general circulation in English and, if necessary, in the appropriate language(s) so that Citizens will be provided reasonable notice to review and present comments on performance.

K. Technical Assistance

Technical assistance is made available as necessary to groups and organizations representative of persons of low and moderate-income that requests such assistance in developing proposals for funding assistance under the Consolidated Plan.

EDA makes technical assistance available to current and potential activity sponsors through the Program Managers who are the main source of information on CPD programs and the application process. Program Managers are available to provide assistance at community meetings and during proposal preparation, evaluation, review, and monitoring. Although the Program Managers are the primary contact to the communities and service providers, all other related EDA resources will be made available.

L. Complaints

Residents or other interested parties may submit complaints to the County in relation to administration of the CPD-funded programs. Complaints may be made via telephone by calling (951) 955-8916 or in writing to the Economic Development Agency. The complaining party should state the nature of the complaint, what prior efforts have been made to resolve the
problem and any other pertinent information which would help staff determine a solution. All complaints will receive careful consideration and a timely, substantive response will be provided within fifteen (15) working days.

M. Monitoring and Evaluation

In accordance with HUD CPD program regulations, the County continually monitors all CPD-funded sub-recipients and their activities. The County's CPD Program Monitoring Policies were developed and adopted in April 2006, through Administrative Program Notice 2006.01, and subsequently revised to ensure compliance with 24 CFR 570.502 (CDBG), 24 CFR 576.500 (ESG), and 24 CFR Part 85.40 (a).

HUD regulation 24 CFR Part 85.40 (a) provides for the general program monitoring responsibilities of the County in the administration of the HUD-funded CPD programs.

Monitoring by grantees Grantees are responsible for managing the day-to-day operations of grant and sub grant supported activities. Grantees must monitor grant and sub grant supported activities to assure compliance with applicable Federal requirements and that performance goals are being achieved. Grantee monitoring must cover each program, function, or activity.
Definitions

**CDBG**: Community Development Block Grant, a HUD grant which provides for a variety of community development programs that benefit low and moderate income persons.

**ESG**: Emergency Solutions Grant, a HUD grant that provides funds for services necessary to help those persons quickly regain stability in permanent housing after experiencing a housing crisis and/or homelessness.

**HOME**: Home Investment Partnership Programs, a HUD grant that provides funds to expand the supply of decent and affordable housing for low income households.

**One-Year Action Plan (OYAP)**: This document updates the Consolidated Plan on an annual basis and allocates one year’s funding (entitlement and program income) to specific projects and activities for the CDBG, ESG, and HOME programs.

**Consolidated Plan**: This document is submitted to HUD and serves as the planning documents of the jurisdiction and application for funding CDBG, ESG, and HOME. The document is developed in accordance with 24 CFR Part 91 and sets forth the priorities and strategies of the programs for a five-year period.


**Low and Moderate Income Persons** – An individual from a household with a total income does not exceed eight-percent (80%) of the median household income for the area (Riverside-San Bernardino Counties), adjusted for family size.

**EDA**: Economic Development Agency – responsible for administration of the County’s CDBG and ESG programs.

**HUD**: the U.S. Department of Housing and Urban Development.