

Appendix G: Community Participation Plan

The Los Angeles County Development Authority (LACDA) develops this Community Participation Plan (CPP) as part of the requirements to receive federal funds for the Community Development Block Grant (CDBG), HOME Investment Partnerships (HOME), and Emergency Solutions Grants (ESG) programs. The CPP defines the public engagement the LACDA will lead in developing its five-year Consolidated Plan (Con Plan), each related Annual Action Plan (Action Plan), each Consolidated Annual Performance and Evaluation Report (CAPER), and any substantial amendments to the Con Plan or its five Action Plans.

This CPP is organized in the following structure:

- Purpose
- Access to Participation Opportunities
- Amendments and Administrative Updates
- CAPER
- Affirmatively Furthering Fair Housing (AFFH) and the Assessment of Fair Housing (AFH)/Analysis of Impediments (AI)
- Publication and Access to Public Records
- Anti-Displacement and Community Participation for Other Programs
- Technical Assistance
- Complaints and Grievances

Purpose

The CPP:

- Sets the policies and procedures for community participation in Los Angeles Urban County's consolidated planning process and meets the requirements of the Citizen Participation Plan found at 24 CFR §91.105. The LACDA, as the lead agency for Con Plan, bears the responsibility for following the community participation process. Because of the size of the Los Angeles Urban County and its CDBG beneficiaries, each administering agency may expand on the requirements outlined in this CPP.
- Encourages Los Angeles Urban County residents to participate in the Consolidated Planning process from the beginning. This Plan outlines the procedures for community approval of the Con Plan, for addressing concerns and complaints, and for making amendments to the Con Plan after approval.
- Encourages participation among our potential program beneficiaries: persons of extremely low, low, and moderate incomes and residents of areas where funds are proposed to be used. In addition, it allows community members to participate in a collaborative process that involves proposing activities and assessing performance.
- Emphasizes the need to provide community members with adequate information and to allow them the opportunity to give meaningful input.

Definition of Terms

TERM	DEFINITION
CPP	A Citizen Participation Plan is required to receive funding from the U.S. Department of Housing and Urban Development (HUD) for the CDBG, HOME, and ESG Programs. This CPP meets the Citizen Participation Plan requirements.
Administrative Agencies	The LACDA and its participating cities
Participating Cities	Los Angeles Urban County generally consists of its unincorporated areas, plus cities with populations of less than 50,000 persons that have signed cooperation agreements with the LACDA. Currently, 47 cities participate in the Los Angeles Urban County program. As the grantee, the LACDA provides the participating cities with administrative and technical assistance in the planning and implementation of CDBG, HOME, and ESG activities within their jurisdictions.
Unincorporated Areas	There are 88 incorporated cities within Los Angeles County (County), each with its own city council. The areas that are not part of these cities are considered unincorporated County territory.
Public Hearing	Public or community meetings, forums, or town halls, including those held virtually, for purposes of this CPP ¹

Access to Participation Opportunities

Advertisement and Public Notice

Public hearings and community meetings will be advertised at least 14 calendar days in advance of the hearing and at the beginning of official public comment periods. The public notice shall indicate the date, time, location, and purpose(s) of the meeting, and discloses information that will contribute significantly to the public’s understanding of the issues to be discussed at the meetings and hearings.

County residents must be given adequate notice of all hearings and meetings through advertisements in the Los Angeles Times and/or other local publications of general circulation serving the community of affected residents.

The LACDA may use additional or alternative means of advertising as appropriate including, but not limited to, posting notices on the LACDA’s website (www.lacda.org) and social media accounts, placing radio public service announcements, developing press releases, sending notices to community organizations, mailing flyers, and distributing or posting notices at libraries, parks, and other public areas.

¹ Meetings held for purposed of this CPP will meet the requirements for public hearings under 24 CFR §91.105(e)(1).

Access to Meetings

Administering agencies will ensure that architectural barriers do not prevent the attendance of disabled persons at meetings and hearings convened under this CPP. In addition, accommodations, upon request, will be made for attendees who are either visually or hearing impaired. Requests for special accommodations or materials in an alternative format can be made by contacting Emily Codilla at (626) 586-1854, ActionPlan.Staff@lacda.org, or the California Relay Service at (800) 735-2959 (TTY) with at least five business days' notice.

For in-person and virtual meetings, accommodation for persons with disabilities will be made available to the greatest extent possible. Virtual meetings will be used in lieu of in-person hearings for access, public health, or other emergency reasons.

Community Meetings and Public Hearings in Unincorporated Areas

Participation and Information Provided

Before submission of the five-year Con Plan and Action Plan, administering agencies must solicit community input at all stages of the community development planning process through a public community meeting. The community meeting may be held at the LACDA, which is centrally located to Los Angeles Urban County residents. Virtual public community meetings and hearings may be used instead. The LACDA will post notices of all public community meetings, including virtual hearings, at yourvoicecounts.lacda.org.

The LACDA holds at least one public community meeting each year at the beginning of the planning process. Residents will be notified of the location of the public community meeting through advertisements in several newspapers no less than 14 calendar days before the meeting. The public community meeting is held to obtain community views on housing and community development needs and to allow residents to review program performance.

To facilitate substantive input, persons attending the public community meeting will be provided with the following information:

- The range of housing and community development activities that may be undertaken with CDBG (including HUD-guaranteed Section 108 loans), ESG, and HOME funds.
- Specific examples of activities that were undertaken to benefit their community during the most recently completed fiscal year including descriptions of these activities, their locations, and the funds allocated or expended. At least one copy of the annual CAPER will be available to the public for this purpose.
- The amount of funds expected to be available to the Los Angeles Urban County, including the annual grants, proceeds from HUD guaranteed loans, and other program income.
- The amount of funds expected to be available to each Supervisorial District for the unincorporated areas of the County, including the annual grant allocation and program income.

Meeting Format

Community members are invited to attend the community meeting to learn about the programs and services available to them through the LACDA and other Los Angeles Urban County CDBG programs. They are also invited to express their views on their neighborhood's housing and community development needs. The community meeting is a comprehensive, interactive forum facilitated by the LACDA staff, to identify community and economic development needs.

The goals of the meeting include:

- Increasing public engagement through a proactive marketing strategy, which includes partnerships with community leaders and organizations, direct mailings to unincorporated area residents, posting on the LACDA's website and social media accounts, and/or local advertisements.
- Providing a less formal and more interactive forum using examples of existing projects benefiting the neighborhood and a discussion of the community needs and local programs.
- Administering a survey to receive input on neighborhood housing and community development needs. All surveys used to gather community input will also be available to all County residents, not just to those who attend related community meetings.

Involvement of Public Housing Residents and Section 8 Participants

The LACDA specifically markets the community meeting to public housing residents and Section 8 participants through direct mailings, flyers, posting on relevant social media accounts, and announcements at resident council meetings to encourage them to participate in the planning process. Transportation to the community meeting may also be provided to public housing residents.

Comment Period

County residents can present oral or written comments by attending the community meeting. Residents unable to attend the community meeting are invited to submit written comments and/or surveys during the community meeting period and during the public comment period for inclusion in a summary of the community's input used during the County's planning process.

The LACDA will attach a summary of all comments received and incorporated into the Action Plan, and a summary of comments not accepted (and the reasons therefore) to the Action Plan.

Briefings

In addition to the annual community meeting, the LACDA may also involve the public in community advisory meetings and/or attend other meetings to inform the public about specific CDBG- or HOME-funded programs. Upon request by a Supervisorial District or the public, the LACDA may attend regularly scheduled meetings by various nonprofit or civic organizations to inform them of available CDBG-funded programs, as well as the availability of funding within their geographic area.

Participating City Planning Process

Cities annually plan the use of their CDBG funding, determining how best to use these funds to support the housing and community development needs of their communities. This planning is done in conjunction with a city's staff, elected officials, and the public. The following describes the difference between projects that are included in the Action Plan (Annual Activity Planning) from those that are not (Off-Cycle Activity Planning).

- Annual Activity Planning – CDBG activity planning is conducted prior to the start of the fiscal year. After city authorization, annual projects are included in the Los Angeles Urban County's Action Plan, which is later approved by the County Board of Supervisors (Board). Projects included in this process are considered part of the Los Angeles Urban County's annual activity planning, which is submitted and approved by HUD before the start of the fiscal year.
- Off-Cycle Activity Planning – Cities periodically engage in activity planning outside of the annual planning process mentioned above. In these instances, actions to modify or significantly change a city's program are considered off-cycle changes and are categorized as "Substantial Amendments" *if* they involve the following types of program changes:
 1. A new activity that was **not** included in the Action Plan (Proposed Project);
 2. A funded activity described in the Action Plan, but canceled during the fiscal year (Canceled Project); or
 3. A project listed in the Action Plan is changed from one eligible activity to another, or there is a change in purpose, scope, location, or beneficiaries (Revised Project).

Public Notice Requirements

The public will receive notice, as well as the opportunity to submit comments for both Annual Activity Planning and Off-Cycle Activity Planning.

- Annual Activity Planning: Participating cities must allow their constituency to provide input on housing and community development needs by holding one or more community meetings or a public hearing. The notification period for the public meeting must be a minimum of 14 calendar days and the public must have an opportunity to submit comments regarding the proposed activities for the upcoming fiscal year.
- Off-Cycle Activity Planning and Substantial Amendments: Participating cities must ensure that the public is given a 30-day notice of a proposed off-cycle change (an activity that is new or canceled or has a change in use (revised) from its previously identified eligible project), as well as an opportunity to submit comments on the changes prior to implementation.

Acceptable methods of meeting the public notice requirement include:

- Publication of the proposed action in a local newspaper whose primary circulation is within the area serving the community of affected residents; or
- Posting notices in public buildings within the jurisdiction of the administering agency, which include, but are not limited to, public libraries and city hall; or

- Holding public meetings within the city or area affected by the amendment to the approved Action Plan.

Content of the Public Notice

The notice must advise the public of the activity being proposed, how and where to submit comments, as well as when the comment period ends. The public notice must include all the following elements:

Annual Activity Planning

1. Identify that the action is a part of the Annual Activity Planning process.
2. Include the date of the upcoming community meeting/public hearing.
3. Include the project number.
4. Include the project title.
5. Identify the CDBG dollar amount designated for the activity.
6. Include a clear and concise description of the activity and beneficiaries.
7. Notification to the public of how and where to submit comments.
8. Include the date of when the public comment period ends.

Off-Cycle Activity Planning and Substantial Amendments

1. Identify that the action is a Substantial Amendment to the Action Plan.
2. Identify the type of amendment: Proposed Project, Cancelled Project, or Revised Project.
3. Include the project number.
4. Include the project title.
5. Identify the CDBG dollar amount of the activity.
6. Include a clear and concise description of the activity and beneficiaries.
7. For Revised Projects, the public notice must describe the information above for both the original and the new project, including reallocated funding amounts.
8. Notification to the public regarding how and where to submit comments about the proposed changes.
9. Include the date of when the public comment period ends.

Documenting Public Noticing

Both *Annual Activity Planning* (14-day notice period) and *Off-Cycle Activity Planning, Substantial Amendments* (30-day notice period) require public noticing and documentation in one of the two following methods:

- **Public Notice Posting:** If noticing the public through public advertising, cities must submit a copy of the official "*Proof of Publication*" and any comments received from the public regarding the project; or
- **Public Place Posting:** If noticing the public by posting in public buildings within the jurisdiction of the administering agency, cities must submit a copy of the notice posted with the city clerk attesting the day and location(s) of the posting, and any comments received from the public regarding the project.

Each city will be responsible for sending a copy of the appropriate documentation to the LACDA’s assigned Contract Manager in the Community Development Division and for maintaining this documentation in its files.

Documented City Council Action

To document official action by the jurisdiction, a clear description of the activity and the budget for each action/project must be identified and submitted to the Community Development Division Contract Manager for all Annual Activity Planning Projects. After city council action, participating cities are required to submit proof of the city council’s approval of its proposed activities by utilizing at least one of the following:

- A copy of the adopting resolution or approved city council minutes.
- A letter from the city manager stating that the activities have received city council approval.
- A certification by the city clerk stating that the activities have received city council approval.

Summary of Documentation to be Submitted to the LACDA

Timely approval is dependent upon receipt of the required documentation by the Community Development Division Contract Manager. The required documentation for each Annual Activity Planning and Off-Cycle Activity Planning project is summarized below:

Annual Activity Planning	Required Documentation to the LACDA
Projects Proposed for the Action Plan	(1a) Proof of public notice publication (14-day required); or (1b) Certification of public posting (if applicable); and
	(2) Any public comment(s) received; and
	(3) Certification of City Council action.

Off-Cycle Activity Planning	Required Documentation to the LACDA
Proposed Project	(1a) Proof of public notice publication (30-day required); or (1b) Certification of public posting (if applicable); and
	(2) Any public comment(s) received.
Cancelled Project	(1a) Proof of public notice publication (30-day required); or (1b) Certification of public posting (if applicable); and
	(2) Any public comment(s) received.
Revised Project	(1a) Proof of public notice publication (30-day required); or (1b) Certification of public posting (if applicable); and
	(2) Any public comment(s) received.

This documentation is kept on file at the LACDA and is available for public review.

Countywide Public Hearing and Comment Period

After the publication of the draft Action Plan, the Board convenes a public hearing to obtain views of County residents on projects proposed for funding in the ensuing fiscal year. The Action Plan, developed and disseminated by the LACDA, describes each proposed project in sufficient detail to enable residents to determine how they may be affected.

The LACDA shall make copies of the draft Action Plan available to the public for review at its offices, public libraries throughout the County, and on the LACDA's website at www.lacda.org/community-development/plans-and-reports. The public will be notified of library locations and the time and location of the public hearing through the advertisement of a public notice in several newspapers and online at www.lacda.org at least 30 calendar days before the public hearing. The public will have 30 calendar days and up to the day of the public hearing to comment. Comments may be submitted in writing or via email to the LACDA as noted in the public notice.

On the day of the public hearing, comments may be submitted in writing or made orally to the Board at the public hearing. All public comments made both orally and in writing will be included in the final Action Plan submitted to HUD. The agenda posted on the Board's website at publiccomment.bos.lacounty.gov provides instructions on how to submit public written and oral comments during the public hearing.

Amendments and Administrative Updates

The LACDA shall *amend* the Action Plan when it:

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

Definition of Terms

- **Standard Amendments:** Amendments that are not considered substantial shall be referred to as standard amendments. Standard amendments do not require community participation.
- **Substantial Amendments:** The LACDA has determined that an amendment is substantial when:
 - A new activity that was not included in the Action Plan is proposed;
 - A funded activity described in the Action Plan is canceled during the fiscal year; or
 - A project listed in the Action Plan is changed from one eligible activity to another, or there is a change in purpose, scope, location, or beneficiaries.
- **Administrative Updates:** Changes to the Action Plan that do not meet the criteria for standard or substantial amendments and do not require community participation are defined as administrative updates. Examples include the following: grammatical or structural edits that do not substantially change the scope or meaning of activity and changes in the coding or eligibility determination of a project that does not change the scope, location, or beneficiaries.

Public Notice and Comment

The LACDA will provide affected residents with a period of no less than 30 calendar days to make comments on a substantial amendment before it is implemented. Public notice shall include how and where to submit comments on the proposed changes. A summary of these comments and a summary of comments not accepted and the reasons, therefore, shall be attached to the substantial amendment that is submitted to HUD.

Acceptable methods of meeting the community participation requirements include:

- Publication of the availability of substantial change(s) in a local newspaper. The publication will provide a link to the LACDA's website at www.lacda.org, which will provide more detailed information on the substantial amendment(s) and how to provide comments.
- Publication of any proposed change shall appear in a local newspaper whose primary circulation is within the area serving the community of affected residents and include how to provide comments;
- Advertisement of the availability of the proposed change on the LACDA's website and include how to provide comments;
- Posting notices in public buildings within the jurisdiction of the administering agency, which include, but are not limited to, public libraries, and include how to provide comments; or
- Holding meetings with community advisory groups within the area affected by the substantial amendment.

Disaster/Emergency Events that may Require Expedited Substantial Amendments

It may be necessary to expedite substantial amendments to the Con Plan in the event of a declared disaster or emergency. There are three types of disasters/emergency events that may necessitate an expedited substantial amendment including:

1. Man-made disasters – Examples include chemical spills, mass rioting, power outages, dam failure, plant explosions, etc.
2. Natural disasters – Examples include earthquakes, tsunamis, hurricanes, tornadoes, wildfires, flooding, and public health issues, such as COVID-19
3. Terrorism – Examples include bomb threats, biochemical attacks like the spread of anthrax, or cyber-attacks like hacking, phishing, and virus distribution, etc.

These expedited substantial amendments may include funding new activities and/or the reprogramming of funding (ex: including canceling activities) to meet needs resulting from a declared disaster or emergency. Thus, the LACDA and/or participating cities may utilize CDBG, HOME, or ESG funds to meet these needs with a five-day public comment period, if a waiver is approved by HUD for a shorter public review period to help expedite assistance, instead of a 30-day public comment period.

NOTE: For CDBG funding under Fiscal Year (FY) 2019-2020, FY 2020-2021, and the Coronavirus Aid, Relief, and Economic Security Act or CARES Act, the LACDA and participating cities may provide a five-day notice

of a proposed off-cycle change beginning April 8, 2020, as allowed under the HUD waiver, "[Availability of Waivers of Community Planning and Development \(CPD\) Grant Program and Consolidated Plan Requirements to Prevent the Spread of COVID-19 and Mitigate Economic Impacts Caused by COVID-19.](#)" This waiver only applies to FY 2020 funds.

With respect to a declared disaster, the LACDA and/or participating cities may elect to use CDBG, HOME, or ESG funds to address needs not provided for by the Federal Emergency Management Agency (FEMA) and the Small Business Administration (SBA), or other disaster relief efforts. Funding for disaster relief may not duplicate other efforts already undertaken by federal or local sources, unless allowed by the federal government. Potential eligible uses of funds are those that are included in this CPP, the Action Plan, or any other CDBG, HOME, or ESG eligible use. HUD may provide new guidance on eligible uses or waivers for alternate protocols which the LACDA will comply with and may utilize as well.

All eligible CDBG activities, including those that address declared disasters or emergencies, must meet one of three national objectives which are:

1. To benefit low- and moderate-income (LMI) persons;
2. Aid in the prevention of slums or blight; and
3. Meet a need having a particular urgency (referred to as urgent need).

Responding to the COVID-19 Pandemic

Funding to programs, such as those for seniors and youths, are designed to prepare, prevent, and respond to the effects of the coronavirus.

Submission of Amendments and Administrative Updates to HUD

The LACDA will submit Substantial Amendments to HUD on a rolling basis or at the end of the fiscal year. Standard Amendments and Administrative Updates are not formally noticed to the public, nor submitted to HUD; however, cancellation of projects will be included in the CAPER, which is made available to the public.

CAPER

Current regulations require that the LACDA prepare and submit a CAPER to HUD 90 days after the end of the fiscal year. The CAPER allows HUD, local officials, and the public to evaluate the LACDA's overall performance, including whether activities and strategies undertaken during the preceding year made an impact on the goals and needs identified in the Con Plan and Action Plan.

Before submitting the CAPER, a notice is published in a newspaper of general circulation that serves the community of affected residents. The notice will indicate that copies of the CAPER are available for public review for a period of no less than 15 calendar days. The document will be available for review at the offices of the LACDA, at several public libraries throughout the County, and/or on the LACDA's website at www.lacda.org/community-development/plans-and-reports. The notification will also advise the public of how and where to submit comments regarding the CAPER. A summary of these comments and a

summary of comments not accepted and the reasons, therefore, shall be attached to the CAPER before it is submitted to HUD.

The final CAPER, which includes the most recent completed fiscal year, will be available at the annual community meeting to inform affected residents of specific activities that were undertaken in their communities.

Affirmatively Furthering Fair Housing (AFFH) and the Assessment of Fair Housing (AFH)/Analysis of Impediments (AI)

Effective April 2, 2025, HUD's 2025 Interim Final Rule rule revises HUD's regulation governing the Fair Housing Act's mandate that the HUD Secretary administer HUD's program and activities in a manner that affirmatively furthers fair housing. This interim final rule returns to the original understanding of what the statutory AFFH certification was prior to 1994—a general commitment that grantees will take active steps to promote fair housing. Grantee AFFH certifications will be deemed sufficient provided they took any action during the relevant period rationally related to promoting fair housing, such as helping eliminate housing discrimination. This interim final rule does not, however, reinstate the obligation to conduct an AI or mandate any specific fair housing planning mechanism; program participants must continue to affirmatively further fair housing as and to the extent required by the Fair Housing Act.

Community Participation, Consultation, and Coordination

The LACDA will conduct outreach per HUD's requirements. The LACDA will meet these requirements by:

1. Hosting community meetings for the general public. The LACDA may use various methods of outreach to ensure residents are notified of the community meetings, such as:
 - Direct mailings;
 - Posting on the LACDA's website and appropriate social media accounts; and
 - Notifying residents through a public notice, as well as newspaper advertisements 14 calendar days before the community meetings.
2. Consulting with agencies and organizations identified in consultation requirements at 24 CFR part 91 (see 24 CFR §§ 91.100, 91.110, and 91.235) and 24 CFR §§ 903.13, 903.15, 903.17, and 903.19.
3. Allowing the public to review the draft documents, including:
 - Providing 45 calendar days for the public to submit comments on the draft documents;
 - Making the draft documents available on the LACDA's website, as well as making hard copies available at the LACDA and local libraries; and
 - Notifying residents through a public notice, as well as newspaper advertisements 14 calendar days before the community meetings.
4. Reporting on their community participation processes and outcomes by providing the following in the final documents²:
 - A concise summary of the community participation process, public comments, and efforts

²Pursuant to [24 CFR § 5.150-5.152](#).

- made to broaden community participation in the development of the documents;
 - A summary of the comments, views, and recommendations received in writing, or orally at community meetings or public hearings, during the community participation process; and
 - A summary of any comments, views, and recommendations not accepted by the program participant and the reasons for non-acceptance.
5. Including the goals and strategies, if applicable, in the next Con Plan and the next Five-Year Public Housing Agency (PHA) Plan. With adequate noticing in compliance with this CPP, residents will be allowed to provide comment on the Public Housing goals and strategies within the draft PHA Five-Year Plan and PHA Annual Plan, which both provide a 45-day public comment period before they are finalized, and those in the draft Con Plan and Action Plan, which both provide a 30-day comment periods before they are finalized. The LACDA Public Housing accomplishments will be reported in the PHA Plan and community planning and development accomplishments will be reported in the CAPER.

Publication and Access to Public Records

Publishing the Final Action Plan

Following the public hearing, the Board authorizes the submission of the final Action Plan to HUD. The LACDA shall make copies of the final Action Plan available to the public for review at the LACDA, at several public libraries throughout the County, and/or on the LACDA's website at www.lacda.org. Final copies shall also be made available to the participating cities.

Access to Public Records

All community members will be given reasonable access to information and records regarding the Action Plan and the programs and projects it covers. Such information and records will be available at the offices of the administering agencies, Monday through Friday from 8:00 a.m. to 5:00 p.m., or within the normal business hours of the agencies. Current copies of all major documents related to the Action Plan, Con Plan, and CAPER, are available upon request. They are also posted online on the LACDA's website at www.lacda.org/community-development/plans-and-reports. Copies (including those in alternative formats accessible to persons with disabilities, or other languages) may be requested in person at the address listed below, by emailing ActionPlan.Staff@lacda.org, by calling (626) 586-1854, or by mail to:

Los Angeles County Development Authority
700 W Main St
Alhambra, CA 91801
Attn: Community Development Division

These documents may be obtained from the LACDA in accordance with the LACDA's fee policy for copies. Program records maintained on file or requiring research and compilation shall be provided within a reasonable period upon receipt of a written request, which specifically states the information desired. 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 shall

be determined by a combination of the number of copies requested, the size (pages and/or dimensions) of the document, the length of time needed to compile the data, and the direct costs to the administering agency to duplicate the document.

Program records maintained on file or requiring research and compilation shall be provided within a reasonable period upon receipt of a written request, which specifically states the information desired. All books and records relating to the Action Plan shall be maintained and available for a minimum period of five years.

Anti-Displacement and Community Participation for Other Programs

The CPP describes how the LACDA will engage persons who may be temporarily relocated or permanently displaced due to the use of CDBG, HOME, or ESG funds.

Relocation

The LACDA has adopted a policy that requires that a relocation assessment be completed in any circumstance when even one person may be displaced as the result of a project.³ This policy exceeds all state and federal requirements. The purpose of this assessment is to ensure that the LACDA is advised early in the process of any major relocation issues that may be encountered in a project. The early recognition of problems gives the LACDA the opportunity to cancel a project if there are excessive displacements in a project.

Displacement

Displacement occurs when a person moves as a direct result of a federally assisted acquisition, demolition, conversion, or rehabilitation activities because they are:

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

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

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

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

³ The LACDA follows the Citizen Participation process required in Paragraph 6012 of the State of California Relocation Regulations and HUD relocation regulations found in HUD Transmittal 1378 Paragraph 2-2.

Relocation of Displaced Persons

When a substantial number of persons will be displaced from their dwellings, the LACDA shall encourage the residents and community organizations in the displacement area to form a relocation committee. The committee shall include, when applicable, affected residential owner-occupants, residential tenants, businesspeople, and members of existing organizations within the area. In lieu of initiating a new process of community participation, public entities may utilize existing community participation and committees related to a development program if the goals of community participation will be reached.

During the relocation planning process, the LACDA will guarantee the following at a minimum:

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

Change in the Use of Real Property

The standards described in this section apply to real property within the administering agency's control, which is acquired or improved in whole or in part using more than \$25,000 in CDBG funds (24 CFR §570.505). These standards shall apply from the date CDBG funds are spent on the property until five years after close-out of the grant from which the assistance to the property was provided.

A recipient cannot change the use or planned use of any property (including beneficiaries of such use) from that for which the acquisition or improvement was made, unless the recipient provides affected residents with an opportunity to comment on any proposed change, and either:

1. The new use of such property qualifies as meeting one of the national objectives and is not a building for the general conduct of government; or
2. The recipient determines, after consultation with affected residents, that it is appropriate to change the property's use to another use which does not meet a national objective and reimburses the CDBG program in the amount of the current fair market value of the property, less any portion of the value attributable to expenditures of non-CDBG funds for the acquisition of and improvements to the property.

Community members will be informed of changes in the use or planned use of the property by means of a notice, which will be published in a newspaper of general circulation that serves the community of affected residents. The notice will provide a description of the proposed change in use or planned use of the property and will also advise how and where to submit comments. The public will have an opportunity

to comment on the proposed change in use or planned use of the property for a period of no less than 15 days.⁴

Community Participation for Environmental Reviews

The LACDA has assumed the role of “Responsible Entity” from HUD for certain federally funded programs within the County.⁵ Thus, the LACDA must assume the responsibility for environmental review, decision-making, and action that would otherwise apply to HUD under the National Environmental Policy Act of 1969 (NEPA) and other provisions of law that further the purposes of NEPA.

The LACDA maintains a written record of the environmental review undertaken for every project or program receiving federal funds administered by the LACDA. This environmental review record (ERR) is available for public inspection. Moreover, certain projects require publication of specific actions/findings, which include a description of the activity, its location, and identification of any measures required to mitigate potentially significant adverse effects. Public comment periods are included in the review process as prescribed by NEPA and 24 CFR Part 58.

Community Participation for Loan Guarantee Programs

The LACDA will comply with the following pre-submission and community participation requirements before submitting an application for Section 108 loan guarantee assistance to HUD.⁶ These requirements will also apply to the submission of an EDI application.

1. The LACDA will develop a proposed application to include the community development objectives and activities the LACDA proposes to pursue and carry out with the Section 108 funds. Each activity will be described in sufficient detail, including the provision under which the project is eligible, the national objective it meets, the amount of funds expected to be used, and the activity’s location to allow community members to determine the degree to which they will be affected. The proposed application will also indicate which activities will generate program income and where community members may obtain additional information about proposed activities. The proposed application will also include a description of the pledge of grants required under [24 CFR § 570.705\(b\)\(2\)](#).
2. The LACDA will publish a countywide public notice that will include its proposed application to give affected residents an opportunity to examine the application’s contents and to make comments. The public notice will be published at least 14 calendar days in advance of the public hearing and will advise community members of when and where a public hearing will be held, as well as how and where to submit comments.
3. A minimum of two public hearings, occurring at different stages of the Action Plan community participation process, will be held to obtain the views of community members and respond to questions. Before submission of a Section 108 application to HUD, at least one of these hearings will be held to obtain the residents’ opinions on community development and housing needs. At

⁴ Further details on changes in use requirements are set forth in the CDBG regulations at [24 CFR § 570.505](#).

⁵ In accordance with the provisions of [24 CFR Part 58](#).

⁶ In accordance with Section 108 regulations, Subpart M-Loan Guarantees at [24 CFR § 570.704](#).

the hearing, each activity will be described in sufficient detail including the provision under which the project is eligible, the national objective to be met, the amount of funds expected to be used, and the activity's location so that residents can determine the degree to which they will be affected. The public will have up to 14 calendar days and including the day of the public hearing to comment.

4. Once the LACDA has published the public notice and held the public hearing, the LACDA will determine if the proposed application needs to be modified, based on comments and views received, before submitting the application to HUD. Upon completion, the final application will be made available to the public on the LACDA's website at www.lacda.org.

Technical Assistance

Residents are encouraged to recommend activities that should be undertaken to meet housing and community development needs. Groups representative of extremely low-, low- and moderate-income persons desiring to develop project proposals may contact their respective administering agencies for technical assistance. Each respective administering agency will determine the level and type of technical assistance on a case-by-case basis.

Complaints and Grievances

Community members, administering agencies, and other interested parties may submit complaints and grievances regarding the Con Plan and Action Plan. Complaints should be in writing, be specific in their subject matter, and include facts to support allegations. The following constitute complaints to which a response is due:

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

Residents may also present complaints and grievances orally or in writing at a community meeting and/or public hearing for the draft Con Plan or Action Plan. All public comments, including complaints and grievances, made either orally or in writing within the 30-day public comment period, will be included in the final Con Plan or Action Plan.

Timely Response

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

Within 15 calendar days of receiving the complaint, the LACDA shall discuss the matter with the administering agency and respond to the complainant in writing. A copy of the LACDA's response will be concurrently transmitted to the complainant and the administering agency. If, due to unusual circumstances, the administering agency finds that it is unable to meet the prescribed time limit, the limit may be extended by written notice to the complainant. The administering agency's notice must include the reason for the extension and the date on which a response is expected to be generated, which may be based on the nature and complexity of the complaint.

Written complaints may be submitted to ActionPlan.Staff@lacda.org or mailed to:

Los Angeles County Development Authority
700 W Main St
Alhambra, CA 91801
Attn: Community Development Division