

Draft

Citizen Participation Plan

of the

City of Los Angeles

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City of Los Angeles Citizen Participation Plan

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INTRODUCTION

Overview

The City of Los Angeles is committed to providing opportunities for its citizens to participate in the development of plans and to comment on reports that outline activities funded by the US Department of Housing and Urban Development (HUD), Office of Community Planning and Development (CPD). These plans and reports include the Consolidated Plan (Con Plan), the Annual Action Plan, substantial amendments to the Con Plan, and the Consolidated Annual Performance and Evaluation Report (CAPER). The Citizen Participation Plan (CP Plan) is a requirement of the Con Plan under 24 Code of Federal Regulations (CFR) Parts 91.100 and 91.105. This update reflects the latest federal regulations regarding consolidated planning, implementation, and reporting process for HUD CPD programs. The City will place a copy of this Plan in draft form on its website and provide at least 30 days to solicit comments from the community. The CP Plan will then be submitted to the Mayor and City Council for approval.

City Department Reorganization

On July 1, 2013, the City's housing and community investment programs were officially integrated into the Los Angeles Housing and Community Investment Department (HCIDLA). HCIDLA is responsible for administering the Con Plan, the CP Plan, and the HUD CPD funds received by the City. HCIDLA is committed to building sustainable neighborhoods through affordable housing development and preservation, code enforcement, rent stabilization, and human and community services. All questions and comments relating to the CP Plan, Con Plan, Annual Plan, Substantial Amendments and the CAPER should be addressed to the Strategic Planning and Policy Division, HCIDLA, 1200 West 7th Street, Los Angeles CA 90017 or via email at hcidla.planning@lacity.org. The HCIDLA website can be found at www.hcidla.lacity.org and the CP Plan and Con Plan can be found at hcidla.org/PlansAndReports.

THE CITY ENCOURAGES PUBLIC PARTICIPATION

The City welcomes and encourages public participation in the development of the five-year Con Plan, the annual Action Plan, Substantial Amendments to those Plans, and the CAPER. Emphasis is placed on the involvement of low and moderate income people—especially those living in the low to moderate income neighborhoods, where funds are proposed to be used. The City will take whatever actions are appropriate to encourage participation of the racial and ethnic groups living in Los Angeles, persons of limited English proficiency, and people with disabilities. The City will coordinate with organizations that serve low income households and individuals with disabilities to solicit participation of the city residents they serve as well as with businesses that may employ or serve lower income City residents.

In addition, the City, in consultation with the Housing Authority of the City of Los Angeles (HACLA), encourages the participation of residents of public and assisted housing developments in the process of developing and implementing the Con Plan-related activities. The City will

inform HACLA when draft and final copies of the Con Plan, the Annual Action Plan and CAPER are available on the HCIDLA website for review by its residents and other interested parties.

Citizen participation is essential at all stages of the planning process: identifying needs, setting priorities based on needs, recommending activities to meet high-priority needs, and evaluating the effectiveness of the programs and activities. Opportunities for residents to participate in these processes, include, but are not limited to workshops, public meetings/hearings, and tours of CPD-funded facilities. The City also encourages local and regional institutions and other organizations (including businesses, developers, and community and faith-based organizations) to participate in the process of developing and implementing the Consolidated Plan. The City strives to conduct public meetings at convenient times and locations that are close to lower income neighborhoods that are accessible to persons with disabilities.

The City seeks new techniques to maximize citizen involvement with more sophisticated technology. One of the tools used in the 2013-2017 Con Plan needs assessment was an online needs survey, developed by City staff, to gain additional input from community residents. The HCIDLA's website is used to inform and update the community about Con Plan processes and CPD-funded programs.

BLOCK GRANT PROGRAMS FUNDED BY HUD CPD

On a formula basis, HUD provides annual allocations of grant funds directly to the City of Los Angeles to carry out a wide range of activities including neighborhood revitalization, affordable housing, economic development, improved community facilities, homeless housing and services, and housing opportunities for persons with HIV/AIDS. Four types of block grants are allocated to the City; these fund the following programs:

- Community Development Block Grant (CDBG)
- HOME Investment Partnerships (HOME)
- Emergency Solutions Grant (ESG)
- Housing Opportunities for Persons with AIDS (HOPWA)

Collectively, these are called the CPD-funded programs. When requirements differ, the funding source is specified in this Plan.

These grant programs do not provide cash or grants directly to the public. Rather residents benefit from various programs through the services and affordable housing supported by the CPD-funded programs. The Mayor and City Council determine the specific programs funded each year and the amount of those funds. This information can be found in the annual Action Plan.

A brief description of each type of block grant follows:

- **CDBG (Community Development Block Grant)** has been provided to the City since 1975. Authorized by Congress under the Housing and Community Development Act of 1974, as

amended, the primary purpose of CDBG is the development of viable urban communities, by providing decent housing and a suitable living environment and expanding economic opportunities, principally for persons of low and moderate income. Subject to HUD regulations regarding CDBG eligible activities, CDBG funds may be used for activities that include, but are not limited to:

- o Acquisition of real property for a public purpose;
- o Rehabilitation of residential and nonresidential structures;
- o Construction, reconstruction, rehabilitation or installation of public facilities and improvements, such community centers, libraries, street lighting, sidewalks, etc.
- o Public (social) services, limited to a 15% cap;
- o Clearance and remediation activities
- o Code enforcement (inspection of building code violations and enforcement of codes, but not correcting violations);
- o Planning and administrative activities limited to a 20% cap;
- o Assistance to for-profit businesses to carry out economic development activities that create/retain jobs for low income persons.

Generally, the following types of activities are ***ineligible***:

- o Acquisition, construction, or reconstruction of buildings for the general conduct of government;
- o Operations and maintenance/repair of public works/public facilities (except if providing services to low income people);
- o Political activities;
- o Income payments (cash or direct assistance to low-income persons); and
- o Construction of new housing.

CDBG National Objectives—Funded programs must meet one of three CDBG National Objectives and carry out a CDBG eligible activity. If an activity does not meet both a National Objective and an eligible activity, CDBG funds may not be used, even though that activity may be very worthwhile.

- ***HOME (HOME Investment Partnerships Program)*** are formula grants to localities, authorized by Congress under the National Affordable Housing Act of 1990, as amended, (Cranston-Gonzales Act). Communities use these grants to fund a wide range of housing activities, often in partnership with local nonprofit organizations, to build, buy, and/or rehabilitate affordable rental or ownership housing for low-income households.
 - o Development (site acquisition or improvement, demolition, relocation and construction) of Affordable Rental or Ownership Housing

- o Homebuyer Assistance Programs—Down payment and mortgage assistance for eligible properties
- **ESG (Emergency Solutions Grants)** The Homeless Emergency Assistance and Rapid Transition to Housing Act of 2009 (HEARTH Act) amended the McKinney-Vento Homeless Assistance Act, revising the Emergency Shelter Grants Program in significant ways and renaming it the Emergency Solutions Grants (ESG) program. The Emergency Solutions Grants program places greater emphasis on helping people quickly regain stability in permanent housing after experiencing a housing crisis and/or homelessness. The key changes that reflect this new emphasis are the expansion of the homelessness prevention component of the program and the addition of a new rapid re-housing assistance component. The new ESG program provides funding to:
 - o Engage homeless individuals and families living on the street;
 - o Improve the number and quality of emergency shelters for homeless individuals and families;
 - o Help operate these shelters;
 - o Provide essential services to shelter residents;
 - o Rapidly re-house homeless individuals and families; and
 - o Prevent families and individuals from becoming homeless.

ESG funds may be used for five program components: street outreach, emergency shelter, homelessness prevention, rapid re-housing assistance, and Homeless Management Information System; as well as used for administrative activities.

- **HOPWA (Housing Opportunities for Persons with AIDS)** Authorized by the AIDS Housing Opportunity Act of 1992, HOPWA remains the only federal housing program solely dedicated to providing rental housing assistance for persons and their families living with HIV/AIDS. The program provides states and localities with resources and incentives to devise long-term comprehensive strategies for meeting the housing needs of low-income persons living with HIV/AIDS. HOPWA housing support enables these special-needs households to establish or maintain stable housing, reduce their risks of homelessness, and improve their access to healthcare and other support. Housing assistance provides the foundation from which these individuals and their families may participate in advances in HIV treatment and related care.

PLANS AND REPORTS REQUIRING PUBLIC PARTICIPATION

As noted above, the City will provide the public with the opportunity to participate in the development of and comment on the following plans and reports:

- **The Consolidated Plan (Con Plan)** describes the City's community development priorities and multiyear goals based on an assessment of housing and community development needs, an analysis of housing and economic market conditions and available resources. The

City must describe the housing needs of the low and moderate income residents, outline strategies to meet these needs, and list all resources available to implement those strategies. It also contains the five-year goals, based upon local needs and strategies, which serve as the targets against which HUD will evaluate the City's programs and its performance.

The Con Plan also includes required certifications (written commitments) that the City makes to HUD, including the one that affirms that not less than 70% of the CDBG funds received will be used for activities that benefit low and moderate income persons; and also the certification that says the City will affirmatively further fair housing.

- **Annual Action Plan (AP)** is the one-year portion of the Con Plan that serves as the City's annual application to HUD for CPD funds. The AP sets forth annual priorities, strategies, goals and project activities in support of the Con Plan. It includes the amount of assistance the City expects to receive including grant funds, program income received from loans for previous projects, and other federal, state or local resources. It contains a discussion of leveraging of these resources and a written description of all proposed uses of CDBG, HOME, ESG, and HOPWA funds. The AP describes specific activities and projects to be implemented during the fiscal year, as well as other actions to be undertaken in public policy, institutional structure, public housing improvements, public housing, lead-based paint hazard reduction, coordination efforts, and anti-poverty strategies.

Consolidated Annual Performance and Evaluation Report (CAPER) describes the accomplishments of each project and activity undertaken during the previous fiscal year, including how funds were actually used and the extent to which these funds were used for activities that benefited low and moderate income residents. By providing detailed financial and beneficiary information, the CAPER explains how a jurisdiction is carrying out its housing and community development strategies, projects, and activities. City staff is required to use HUD's Integrated Disbursement and Information System (IDIS) to set up program projects and activities, draw funds, and report accomplishments. This input creates a database that contains information required for the CAPER. The CAPER must be submitted to HUD within 90 days of the close of Los Angeles' program year on March 31; therefore, the CAPER must be submitted no later than June 30. Members of the public have the opportunity to comment on the CAPER during the public comment period and at any public meetings/hearings in preparing the Report.

- **Amendments** may be minor or substantial. Whenever a substantial change (as described in the substantial amendments section of this Plan) is proposed, the amendment will be posted on the HCIDLA website and available for public comment for a period of thirty (30) days, before submission to City Council for adoption.

CONSOLIDATED PLANNING

In 1995, HUD created the Con Plan to serve as the planning document (comprehensive housing affordability strategy and community development plan) of local governments in addition to serving as an application for funding under any of the CPD formula grant programs. The Regulations at 24 CFR Part 91 contain the consolidated planning requirements. The Con Plan is

designed to help local jurisdictions receiving federal funds assess their affordable housing and community development needs and market conditions, and to make data-driven, place-based investment decisions. Consolidated planning can serve as the framework for a communitywide dialogue to identify housing and community development priorities that align and focus funding from the four CPD formula block grant programs.

A key component of the Con Plan is the consultation and citizen participation process described here. Through the Con Plan process, jurisdictions engage the community, both in the process of developing and reviewing the proposed Plan and as partners and stakeholders in the implementation of CPD programs. By consulting and collaborating with other public and private entities, local governments can align and coordinate community development programs with a range of other plans, programs, and resources to achieve greater impact.

THE CITY'S PROGRAM YEAR FOR THE EXPENDITURE OF CPD FUNDS

The City's Con Plan/Annual Action Plan program year begins April 1 and ends March 31.

STEPS IN PLANNING, IMPLEMENTING, AND EVALUATING THE ANNUAL PLAN

The Annual Action Plan (and/or Five Year Con Plan) process consists of the following steps:

Step 1: Initiate the Consolidated Planning Process.

Approximately six (6) months or more before the start of a new program year, usually in September, the City issues a memorandum describing the focus of the City's next annual Action Plan and/or Five-Year Con Plan, estimates of the funds that may be available, and how the City will seek applications for projects to be funded. A calendar is issued for the preparation of the Action Plan or Con Plan and the public meetings that serve as hearings to obtain input from the community in the drafting of the plan.

Step 2: Obtain Applications for Con Plan Funding; Provide Technical Assistance

In general, the City allocates Con Plan funds to programs such as the Affordable Housing Trust Fund, the Economic Development Fund, the Neighborhood Improvement Fund, the Handyworker Program, and other eligible programs. In turn, City departments that administer these programs may issue Requests for Proposals (RFP) or Notification of Funding Availability (NOFAs) to nonprofit agencies to provide specific activities; to for-profit firms that either create or retain jobs for lower income persons; or to developers to create or rehabilitate affordable housing. Entities that meet the qualifications specified in the RFPs and NOFAs may apply for funding. Each RFP or NOFA issued by the City contains information on how technical assistance will be offered to interested parties.

Step 3: Make the Proposed Plan Available to the Public

After the City has conducted public meetings, the Mayor's Office develops a draft Plan that identifies specific programs to be funded and sends that proposal to the City Council for review.

The draft Plan will identify the City's plans to minimize displacement of persons and to assist any person displaced in accordance with the Uniform Relocation Act and/or other such optional relocation assistance permitted by law. The HCIDLA notifies the public that the proposed Plan is available for review, generally in January of each year. The draft plan is published on the HCIDLA website. There are 30 days for public comment. All comments received by the deadline are addressed in the final Action Plan.

Step 4: Conduct a Public Hearing(s) on Proposed Plan

In January to February of each year, the appropriate City Council Committee schedules a public meeting to discuss the Mayor's proposed allocations for the Plan. This Committee meeting is also an opportunity for the public to comment on the proposed Action/Con Plan. The proposed Action/Con Plan, a summary of the public comments submitted within the 30-day review period, and any proposed changes made by the City Council Committee are scheduled for approval by the full City Council. The City Council meets to decide funding allocations. The City Council meeting provides another opportunity for public comment. The final annual Action Plan contains all public comments, including an explanation regarding any comments not accepted.

Step 5: Make the Final Plan Available to the Public

As previously noted, the final annual Action Plan (and/or Five-Year Con Plan) is made available to the public on the HCIDLA website. The public can access the Internet at all public libraries in the City as well as at many community-based organization and senior centers. In addition, copies of the Con Plan are available, upon request, at the offices of the HCIDLA.

TIMEFRAMES FOR PUBLIC NOTICES REGARDING PLANS, REPORTS, AND ACTIVITIES

- A 30-day notice is provided to the public when a federally required document is available for review and comment; this includes the annual Action Plan, Five-Year Con Plan, and Substantial Amendment(s) to the Con Plan/Annual Plan.
- A 15-day public notice is provided to the public for comments on the CAPER prior to its submission to HUD.

Notices are posted on the HCIDLA website. Members of the public may ask to be placed on a list to be notified when any HCIDLA document is available for public comment. Each notice describes how the documents can be accessed and how the public can make comments.

REASONABLE ACCOMMODATIONS

As a covered entity under Title II of the Americans with Disabilities Act, the City of Los Angeles does not discriminate on the basis of disability and, upon request, will provide reasonable accommodation to ensure access to its programs, services, and activities. Sign language interpreters, assistive listening devices, or other auxiliary aids and/or services may be provided upon request. To ensure availability, requests need to be made at least three (3) working days before the meeting. All public hearings are held at locations accessible to people with

disabilities. In addition, translators will be provided for people of limited English proficiency when requests are made at least three (3) working days prior to the hearing. Requests may be made by contacting hcidla.planning@lacity.org and requesting the accommodation.

PUBLISHING THE PLANS, CAPER AND SUBSTANTIAL AMENDMENTS

The Con Plan, Action Plan, CAPER and Substantial Amendments will be provided to citizens, public agencies, and other interested parties in a manner that affords them a reasonable opportunity to examine its contents and to submit comments. Since the entire Con Plan is a massive document, HUD allows jurisdictions to publish a summary for public review and provide access to the entire document upon request. This summary describes the contents and purpose of the Con Plan as well as a description of goals and activities, and includes a list of locations where the entire Con Plan may be examined.

The requirement for publishing are met, in accordance with HUD regulations, by placing a copy on the HCIDLA website. Upon request, a limited number of additional copies of the summary will be printed for the public and community organizations and will be made available in a form accessible to persons with disabilities, when requested. At a minimum, the entire Con Plan and CAPER will be available for review on the HCIDLA website (hcidla.lacity.org).

AMENDMENTS TO THE CON PLAN OR ANNUAL ACTION PLAN

HUD requires jurisdictions to amend its approved plan whenever it makes one of the following decisions:

1. To change allocation priorities or change the method of distribution of funds;
2. To carry out an activity not previously described in the action plan; or
3. To change the purpose, scope, location, or beneficiaries of an activity.

Some changes are considered minor and are referred to as administrative updates or technical amendments; other changes are considered substantial and are illustrated below.

Administrative Updates

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

Technical Amendments

Technical amendments are updates resulting from:

- Changes in HUD requirements or other HUD-provided data;

- Changes made to the City's General Plan, Specific Plans, department functions; or City organizational structure;
- Changes in names, telephone numbers, business unit names, and other like information;
- Other changes that do not rise to the level of a *substantial* amendment defined below.

Amendments related to changes in funding amounts and contract authorities are subject to City Council and/or Mayor approval, per City Charter and Administrative Code requirements.

Substantial Amendments

Substantial Amendments are those that are subject to the public participation process described in this CP Plan. The following constitute the criteria for Substantial Amendments:

1. *A change in priority needs contained in the Con Plan's Strategic Plan.* The addition or deletion of one of the priority needs eligible activities listed in the Con Plan's Strategic Plan (SP-25 Priority Needs Summary) will require a Substantial Amendment. This is because the first step in developing the Con Plan is to identify the City's priority needs that will be addressed by the goals outlined in the Strategic Plan. These needs establish the rationale for the allocation of funds in the Con Plan. Therefore, changes in priority needs could affect the allocation of funds.
2. *Introduction of a project (budget line item) not listed in the current annual Action Plan (e.g., reprogramming of funds).*
3. *An increase or decrease in a budget line item (e.g., reprogramming of funds) in the current annual Action Plan of thirty percent (30%) or more of that line item.* Increases or decreases may occur over time to a budget line item; however, when the cumulative change meets or exceeds the 30% threshold, the project causing that change will be subject to the Substantial Amendment process as well as every project thereafter. For example, if the first time homebuyer program were allocated \$1 million in the 39th Year Annual Action Plan and, during the program year, \$300,000 was added to the program, then a Substantial Amendment would be needed prior to the increase to the program. The same would be true of a like decrease in funds—even if those funds were to be transferred to a program such as the Affordable Housing Trust Fund that was allocated \$20 million and the addition of funds was an increase of 1.75%. In this case, the Substantial Amendment would focus on the reasons for and effects of the decrease in the homebuyer program.

Process for Approving Substantial Amendments

In general, most amendments occur in two ways. In the first case, a City Councilmember makes a motion to reprogram certain funds from a previous project to another current project or a new project. In the second case, management of HCIDLA or another City department wants to transfer funds between line items to improve program operations. In each case, the project must be an eligible use of funds and meet a National Objective (if CDBG). HUD regulations also require that the public be allowed a 30-day comment period on each Substantial Amendment

so that City Council can take those comments into account when acting on the Amendment. The following process has been designed to meet these requirements.

When a Councilmember wants to add or reprogram funds to a new project or a current project, the Councilmember makes a motion in Council that directs staff to determine whether the project is eligible, under the appropriate funding guidelines. The appropriate project personnel meet with HCIDLA staff to complete a project application, which is used to obtain sufficient detail about the project, including environmental information, to determine whether the project would be an eligible use of funds. If the project is determined eligible, staff places a description of the project and funding on the HCIDLA website for public comment. In addition, the project application is forwarded for National Environmental Policy Act (NEPA) review. HUD regulations require NEPA clearance for all federally funded projects.

This process of filling out the project application form, placing an eligible project application on the website for public comment, and sending it for NEPA review and clearance is followed for all department-initiated Substantial Amendments as well. After the public comment period has been completed and NEPA clearance received, a transmittal is prepared and submitted for final Council and Mayor action. In preparing the Substantial Amendment for final Council and Mayor action, careful consideration is given to comments and views expressed by the public, whether given as verbal testimony at the public hearing or submitted in writing during the review and comment period. The Substantial Amendment will include a discussion that presents all comments, plus explanation why any comments were not accepted. Only projects that constitute eligible uses of Con Plan funds will be implemented. In accordance with regulations, HUD will be notified of all amendments.

CHANGING THE CITIZEN PARTICIPATION PLAN

This Citizen Participation Plan can be changed only after the public has been notified of intent to modify it, and only after the public has had a 30-day period to review and comment on any proposed substantial changes to it.

APPLICABILITY OF DISABILITY AND FAIR HOUSING LAWS

It is HCIDLA's goal to create equal housing opportunities for all persons by establishing and implementing policies that prohibit discrimination in housing on the basis of race, color, religion, sex (gender), national origin, disability, marital status, sexual orientation, ancestry, familial status, source of income, medical condition, or age. To accomplish this goal, department policies and procedures regarding accessibility must comply with federal laws administered by HUD's Office of Fair Housing and Equal Opportunity, as well as with state laws.

The Office of Fair Housing and Equal Opportunity implements and enforces the Fair Housing Act (FHA) and other civil rights laws, including Section 504 of the Rehabilitation Act of 1973, Title II of the Americans with Disabilities Act (ADA) of 1990, and the Uniform Federal Accessibility Standards (UFAS). HCIDLA implements the policies to ensure that affordable housing projects

funded through the City are in compliance with the aforementioned accessibility laws and regulations.

Construction

All new construction and substantial rehabilitation housing projects must have five percent (5%) of the units in each project accessible to people with mobility impairments and two percent (2%) of the units accessible to people with sensory impairments. All common areas shall meet the requirements of Section 504 and the UFAS. All newly constructed and substantially rehabilitated public facilities shall meet these requirements.

Property Management

It is the policy of the City of Los Angeles that all developments built or rehabilitated using funding from HCIDLA be operated in accordance with all applicable disability and fair housing laws. Specific applicable laws may depend, in part, on which funding sources are used in a particular project, but will include the federal FHA, the ADA, as well as California's Fair Employment and Housing Act, and the Unruh Civil Rights Act. Not all of the laws apply to all properties. When more than one law applies, developers are to adhere to the law that provides the greatest protection against discrimination.

The City requires that each developer contracting with the City create a management plan, which must be approved by HCIDLA's Occupancy Monitoring Unit. This plan must reflect a commitment to affirmatively further the fair housing rights of individuals with disabilities. Developers must affirmatively market accessible units to individuals with disabilities who need such units due to a disability. Applicants for any and all units shall be considered for occupancy without prejudice in regard to race, color, religion, sex, gender, gender identity and expression, family status, national origin, marital status, ancestry, sexual orientation, disability, source of income, genetic information, or arbitrary characteristics. Developers must provide reasonable accommodations in policies, practices and procedures and allow reasonable modifications to existing facilities to ensure that individuals with disabilities, and households including individuals with disabilities, are not discriminated against or excluded from housing or housing-related services based on disability. Service dogs and other assistance animals shall be permitted in accordance with applicable laws.

Developers will provide effective communication when necessary so as not to exclude applicants and residents from housing or other related services for which they are otherwise qualified because of disability or limited English proficiency. Developers may also be required to complete self-evaluations of their projects and policies to identify and remove any impediments to participation by qualified people with disabilities, and may be under an obligation to appoint a 504/ADA coordinator who can accept complaints from individuals with disabilities.

LANGUAGE ACCESS FOR PEOPLE WITH LIMITED ENGLISH PROFICIENCY

Section 601 of Title VI of the Civil Rights Act of 1964 provides that no person shall “on the ground of race, color, or national origin, be excluded from participation in, be denied the benefits of, or otherwise be subjected to discrimination under any program or activity receiving Federal financial assistance...” To clarify this section further, on August 11, 2000, President Clinton issued Executive Order 13166, "Improving Access to Services by Persons with Limited English Proficiency." This Order required federal agencies to assess and address the needs of otherwise eligible persons seeking access to federally conducted programs and activities who, due to limited English proficiency (LEP), cannot fully and equally participate in or benefit from those programs and activities. The LEP obligations of federally funded programs apply to every person who meets the program requirements, regardless of the person's citizenship status. HCIDLA finalized a Language Access Plan (LAP) to meet these requirements. The LAP can be found on the HCIDLA website (hcidla.org/PlansAndReports). It identifies the language groups of LEP persons in the city and outlines a process for HCIDLA and its sub-recipients to comply with federal regulations.

PLANS TO MINIMIZE DISPLACEMENT OF PERSONS AND ASSIST ANY PERSON DISPLACED

To the extent possible, the City will not undertake any activities that cause the displacement of persons from their homes and/or businesses. However, if displacement occurs, the City will provide for temporary or permanent relocation of persons resulting from public and private acquisition intended for public use and voluntary rehabilitation of private property with funds from CDBG, HOME, or any other federally funded assistance program. A Residential Anti-displacement and Relocation Assistance Plan has been prepared by the City in accordance with the Housing and Community Development Act of 1974, as amended; and HUD regulations at 24 CFR 42.325 and is applicable to CDBG and/or HOME-assisted projects. Displacement resulting from federally funded economic development will be in accordance with HUD Handbook 1378.

Minimizing Displacement

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

- When considering the allocation of HOME and/or CDBG funds, the City will discourage projects that are likely to result in a large numbers of displacements, unless the rehabilitation of a rental development is in support of a City priority;
- Coordinate code enforcement efforts with rehabilitation and housing assistance programs, if possible;
- Encourage staged rehabilitation of apartment units to allow tenants to remain in the building/complex during and after the rehabilitation, working with the empty units first, if appropriate and economically feasible; and

- Adopt policies that provide reasonable protections for tenants faced with conversion to a condominium or cooperative.

Relocation Assistance to Displaced Persons

The City will offer relocation assistance, in accordance with the requirements of 24 CFR 42.350 (a.k.a. "Section 104[d]"), for lower-income tenants who, in connection with an activity assisted under the CDBG and/or HOME programs, move permanently or move personal property from real property as a direct result of the demolition of any dwelling unit or the conversion of a lower-income dwelling unit. The City will ensure that these tenants have the opportunity to choose whether to receive assistance under Section 104(d) or assistance under the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (URA), as amended.

A displaced person who is not a lower-income tenant will be offered relocation assistance in accordance with the URA and implementing regulations at 49 CFR Part 24. The City will ensure that, at a minimum, the allowable relocation benefits under either 49 CFR Part 24 or 24 CFR 42.350 is provided to displaced persons.

One-for-One Replacement of Lower-Income Dwelling Units

The City will replace all occupied and vacant occupiable lower-income dwelling units that are demolished or converted to a use other than as low income housing in connection with a project assisted with funds provided under the CDBG and/or HOME Programs, in accordance with 24 CFR 42.375. Part 42.375 has been waived for demolitions funded through the Neighborhood Stabilization Program (NSP).

Before entering into a contract committing the City to provide funds for a project that will directly result in demolition or conversion of lower-income dwelling units, the City will make public, by posting to the HCIDLA website (hcidla.lacity.org), and submit to HUD the following information in writing:

- A description of the proposed assisted project;
- The address, number of lower-income dwelling units by size (number of bedrooms), and location on a map of lower-income dwelling units that will be demolished or converted to a use other than as lower-income dwelling units as a result of an assisted project;
- A time schedule for the commencement and completion of the demolition or conversion;
- To the extent known, the address, number of lower-income dwelling units by size (number of bedrooms), and location on a map of the replacement lower-income housing that has been or will be provided.
- The source of funding and a time schedule for the provision of the replacement dwelling units;

- The basis for concluding that each replacement dwelling unit will remain a lower-income dwelling unit for at least 10 years from the date of initial occupancy; and
- Information demonstrating that any proposed replacement of lower-income dwelling 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 HUD-approved Con Plan and 24 CFR 42.375(b).

To the extent that the specific location and other data for the replacement dwelling units are not available at the time of the general submission, the City will identify the general location of such dwelling units on a map and complete the disclosure and submission requirements as soon as the specific data is available.

Replacement Not Required Based on Unit Availability

Under 24 CFR 42.375(d), the City may submit a request to HUD for a determination that the one-for-one replacement requirement does not apply based on objective data that there is an adequate supply of vacant lower-income dwelling units in standard condition available on a nondiscriminatory basis within the area.

Relocation Contacts

HCIDLA is responsible for tracking the replacement of lower-income dwelling units and ensuring that they are provided within the required period. HCIDLA is also responsible for overseeing the provision of relocation payments and other relocation assistance to any lower-income person displaced by the demolition of any dwelling unit or the conversion of lower-income dwelling units to another use financed with CDBG or HOME funds in regards to the development of housing.

To contact HCIDLA's Relocation Unit, please call 213-808-8936. For relocation resulting from economic development activities, contact the City's Economic and Workforce Development Department at 213-744-7300.

COMPLAINTS

All efforts will be made by the City to assess and respond to resident grievances and complaints. When a written complaint or grievance is received, a written response will be made within 15 working days, where practicable, by the appropriate implementing department. Residents should send their written complaints to *General Manager, Los Angeles Housing and Community Investment Department, 1200 West 7th Street, 9th Floor, Los Angeles CA 90017*.

The HCIDLA will investigate and provide a timely, substantive written response to every written complaint received from the public. If the matter is not resolved with staff, the General Manager will consider the complaint and respond in writing within 15 working days. A record

will be maintained of all complaints received that will include the nature of the complaint, referrals made, and the final disposition.

KEY COMMISSIONS AND COUNCIL COMMITTEES IN THE CONSOLIDATED PLAN PROCESS

Citizens are invited to attend meetings and make public comments at the following City Commissions and Council Committee. Please note that Commission and Committee names may change over time. Any changes to this CP Plan to modify the names and/or duties of these entities shall be considered a technical amendment to the Con Plan.

All Commissions and the City Council Housing Committee (Housing Committee) are subject to Conflict of Interest Laws under California Government Code Section 1090 et seq. and Title 24 Code of Federal Regulations, Section 570.611, as well as the requirements of the Brown Open Meeting Act. They use Roberts Rules of Order in the conduct of business.

Commission on Community and Family Services (CCFS)

The Commission on Community and Family Services (CCFS) was established by City ordinance in 2010 as an official advisory body to the CDBG program. It replaced the Citizens Unit for Participation (CUP). Like the CUP, the CCFS is a citizen advisory board created to fulfill the HUD mandate that residents of the City be actively involved in informing the formulation of the priorities for the HCIDLA's implementation of the CDBG program.. CCFS plays a significant role in Con Plan community outreach, needs assessment, and development of linkages to Commissioners' communities. A primary task of the Commission is to formulate workable and replicable approaches to expand civic engagement in the Consolidated Planning process, both through traditional and nontraditional means.

Affordable Housing Commission (AHC)

The Affordable Housing Commission (AHC) was created as an advisory body to the Mayor and the City Council on affordable housing policies in the City of Los Angeles. Many appointees are experienced housing professionals who represent community organizations, management, property owner-tenant, and affordable housing advocates. The AHC provides policy guidance regarding HOME and CDBG funding priorities and allocations for housing activities.

Los Angeles Countywide HOPWA Advisory Committee (LACHAC)

The Los Angeles Countywide HOPWA Advisory Committee (LACHAC) was created to provide a broad base of input and expertise in the HOPWA grant planning process. LACHAC is comprised of representatives from the Los Angeles County Commission on HIV Health Services, which locally administers the Ryan White CARE Act monies; representatives of the Homeless services community; representatives with nonprofit housing development expertise; and officials of the County of Los Angeles, the City of Los Angeles (including the City of Los Angeles AIDS Coordinator), and the cities of Long Beach, Pasadena and West Hollywood. Membership also includes individuals who themselves are HIV positive and/or representatives from AIDS service

organizations. Staffing for the committee is overseen by HCIDLA, which oversees the HOPWA grant. The LACHAC provides policy guidance regarding the HOPWA funds received by the City from HUD. As the administering agency, HCIDLA convenes, reports to, and staffs the regular meetings of the LACHAC, which is instrumental in long term program planning and needs assessment and provides a forum for public discussion of HOPWA-related items.

Los Angeles Homeless Services Authority (LAHSA) Commission

The Los Angeles Homeless Services Authority (LAHSA) is a Joint Powers Authority established in 1993 as an independent agency by the County and the City of Los Angeles. LAHSA provides oversight for the funds allocated to it by the City, which include CDBG, ESG, and City General Fund monies allocated to homeless activities. LAHSA is the lead agency in the Los Angeles Continuum of Care, and coordinates and manages over \$70 million dollars annually in Federal, State, County and City funds for programs providing shelter, housing, and services to homeless persons in Los Angeles City and County. The LAHSA Commission obtains information on homeless needs for the development and implementation of homeless services programs and routinely schedules a hearing on the annual Action Plan and CAPER.

City Council Housing Committee

The Housing Committee is a committee composed City Councilmembers that reviews, comments, and makes recommendations to the entire City Council regarding housing, and community development priorities, plans, budgets, activities, and changes in those activities.