

# **EXHIBIT A**

## **CITY OF NAPA CITIZEN PARTICIPATION PLAN**

### **POLICY STATEMENT**

It is the policy of the City of Napa to provide for full involvement by the community and its residents in the planning, development, implementation and evaluation of programs funded under the Housing and Community Development Act of 1974, as amended, including the Community Development Grant (CDBG) Program.

CDBG is a federal entitlement grant that allows entitlement jurisdictions to undertake a variety of housing and community development programming for persons who are primarily low and moderate income. Low and moderate income for purposes of the Community Development Block Grant (CDBG) program is defined as being persons who earn at or below 80% of area median income.

This Citizen Participation Plan sets forth the procedures and guidelines to be implemented by the City to provide for the continuing participation by the citizens of Napa. The City acknowledges the need for, and the role, of citizen involvement, but also recognizes that the final determination and responsibility for policy development rests with the City Council.

This plan may be amended from time to time and shall remain in effect until superseded by a new plan or until the City no longer participates in programs that require such a plan. Citizen Participation does not restrict the responsibility or the authority of the City for the development and execution of its Consolidated Plan and Annual Plan.

### **CONSOLIDATED PLAN AND ANNUAL ACTION PLAN**

The Consolidated Plan consists of three parts: (1) the needs assessment, (2) housing and community development strategic plan, and (3) an action plan. Commonly known as the Consolidated Plan, the needs assessment and community development strategic plan are updated every five years. The action plan ("Annual Plan") is updated annually, reflecting annual CDBG allocations and HOME grants.

The Annual Plan is updated annually, reflecting annual CDBG funding allocations, HOME grants and other funding allocations toward programs/projects identified in the Consolidated Plan. The Annual Plan includes the following elements:

- Description and location of each activity;
- Dollar amounts proposed for each activity;
- Entity responsible for implementation of each activity;
- Time frame for each activity.

Three groups are involved in the process of development of the Consolidated Plan and the Annual Plan:

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- Citizens and Community Groups;
- City Staff;
- CDBG Citizens' Advisory Committee and City of Napa City Council

### **SCOPE OF PARTICIPATION**

#### **A. Citizens and Community Groups**

Citizens and community groups, including non-profit organizations, have two roles to play. Frequently they serve as the originators of programs and projects that eventually may be funded with CDBG funds. In that role, they work with City staff and other funding organizations to develop proposals. The second role is providing citizen input on the Consolidated and Annual Plans, and the Consolidated Annual Performance and Evaluation Report (CAPER).

#### **B. City Staff**

The Housing Division of the Community Development Department is tasked with preparing the Consolidated Plan and Annual Plan. Working with staff from other City departments, the Housing Division is tasked with the following responsibilities:

- Collecting citizen input concerning neighborhood/community needs;
- Consulting with other public agencies regarding community needs;
- Consulting with private organizations that provide health services, social services for children, elderly, disabled, homeless, persons with AIDS, victims of domestic violence, and persons with alcohol/drug abuses, etc.;
- Preparing a prioritized list of neighborhood/community needs for review by the Advisory Committee and City Council;
- Preparing project recommendations for review by the Advisory Committee and City Council and for the City Council's final approval, culminating in the preparation of the Consolidated Plan and Annual Plan; and
- Reviewing project/program progress and reporting on the project/progress to the Advisory Committee and City Council via the CAPER

#### **C. Citizens' Advisory Committee**

The City Council appoints residents to serve on the Citizens' Advisory Committee. Efforts are made to appoint residents who represent the interests of the business community, the handicapped/disabled, seniors, youth, minority groups, low- or moderate-income persons and others who represent those directly affected by the CDBG program.

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The Citizens' Advisory Committee holds regularly scheduled meetings quarterly on the fourth Monday of each month beginning the start of a new quarter (i.e., January, April, July, and October.) Meetings are held in the evening in a publicly noticed location. At the first regular meeting in January, the Committee shall adopt a resolution or bylaws identifying the time, date, and place for regular meetings of the Committee for the calendar year in accordance with the Ralph M. Brown Action, Government Code Sections 54950 *et seq.* ("Brown Act"). The majority of the Committee or the Committee Chair may schedule special meetings of the Committee in accordance with Section 54956 of the Brown Act.

The Advisory Committee is tasked with the following items:

- Promoting and encouraging a wide range of citizen participation and input in the development of the Consolidated Plan and Annual Plan.
- Receiving and reviewing information presented by citizens and public and private agencies on community and neighborhood needs.
- Reviewing information presented by City staff on community and neighborhood needs.
- Reviewing reports on project/program progress and proposed projects in the Consolidated Plan and Annual Plan and making recommendations to the City Council.
- Making recommendations to the City Council on the allocation of CDBG funds in public service and community development activities in the Annual Plan, and on any substantial amendment to the Consolidated Plan and/or Annual Plan.

### **D. City Council**

The City Council is responsible for:

- Holding public meetings to receive citizen's input and carrying out procedures established in the Citizen Participation Plan;
- Making the final determination about the priority of various community needs that will guide the Council when allocating CDBG funds and approving the submittal of application for HOME funds.
- Reviewing the proposed Consolidated Plan and Annual Plan and approving the final documents.

## **THE PROCESS**

### **A. Public Meetings**

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In general, the City holds two (2) public meetings during the course of its program year. Together, the meetings must address housing and community development needs, development of proposed activities, and review of program performance. At least one of the meetings must be held before the proposed Consolidated Plan and/or Annual Plan is published for comment. Other public meetings may also be held. In addition, the Consolidated Plan and/or Annual Plan, is published for a 30-day comment period. The City's annual report, known as CAPER (Consolidated Annual Performance and Evaluation Report) is published annually for a 15-day comment period.

All public meetings shall be noticed in accordance with the Brown Act.

In response to coronavirus, as allowed under the Coronavirus Aid, Relief and Economic Security Act (CARES Act), the City is utilizing waivers authorized by HUD for the fiscal year 2019 and 2020 CDBG grants. Under these waivers, the City is using a reduced public comment period of no less than 5 days which can run concurrently with amendments made to this Citizen Participation Plan. Additionally, public meetings shall be held virtually if national and/or local authorities recommend this format. The meetings shall be held in accordance with the Brown Act. The City shall follow this temporary process for public comment periods and meetings until HUD has suspended the waivers.

Questions and comments regarding the Citizen Participation Plan may be addressed to:

Housing Manager

P.O. Box 660

Napa, CA 94559

Phone number is **707-257-9547**. The fax number is **707-257-9239**.

### **B. Written Comments**

The City encourages the submission of views and written comments by citizens regarding the Citizen Participation Plan, Consolidated Plan, Annual Plan and CAPER. The comments may be submitted to the Housing Division or at any public meeting conducted by the City Council.

All written views and proposals should be submitted no later than two (2) days prior to the last public meeting by the City Council on the final application to be submitted.

The City will respond to all written comments within fifteen (15) working days and state the reasons for the action taken on the proposal or view. All comments or views that were not accepted will be attached to the final plan, amendment or performance evaluation, along with the reasons why they were not accepted.

### **C. Technical Assistance and Accessibility**

To help facilitate citizen input, the City will provide technical assistance, through its staff, to community-wide and neighborhood associations and to groups of low- and moderate-

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income residents and to non-profits that provide assistance to low- and moderate-income persons who request such assistance.

Questions regarding specific programs can be answered by program staff and guidelines for programs will be made available on request. There is no charge for one copy of program materials. Additional copies are subject to the City's per page copy request policies.

Limited English Proficiency: On request, the City will make available translators/interpreters for speakers other than English for meetings and hearings relating to the Consolidated Plan, Annual Plan and CAPER. The City's primary language other than English is Spanish. Public hearings will be held in the City Council Chambers, which are accessible to the disabled. Persons requiring **translation** should contact the City Clerk at least 72 working hours in advance of the meeting to make arrangements. The City Clerk can be reached at **707-257-9503**. Some items may already be translated into Spanish.

Reasonable Accommodation: Citizens with disabilities who need special accommodation in order to access program information must contact the City Clerk at least 72 working hours in advance with its **reasonable accommodation** request. Reasonable accommodation includes the following: providing materials in a different and/or larger typeface/font; providing materials in an alternative medium, making special arrangements for meeting attendance. The City Clerk can be reached at **707-257-9503, or at TTY 707-257-9506**.

### **PUBLIC INFORMATION**

In order for citizens to become informed and involved in the program, the City will provide comprehensive access to program information. Adopted and draft plans and performance evaluations are regularly available on the City of Napa website at [www.cityofnapa.org](http://www.cityofnapa.org). The following information will also be made available during the planning process of program development and implementation:

- Amount of Entitlement
- Types of activities that are eligible for funding and activities previously funded
- Ineligible activities
- Schedule of meetings and hearings and the process to be followed by the City in approving applications

In addition, documents relevant to the Consolidated Plan, funding and reporting processes are available to all citizens during normal working hours. Normal working hours is defined as Monday through Friday from 8:00 to 5:00 p.m. Copies of the following materials are available for review at the City's Housing Division:

- Mailings and promotional material
- Records of hearings and meetings
- Prior applications

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- Reports required by HUD
- Regulations and issuances governing aspects of the program
- Records of prior use of funds for the last five (5) years

### **CITIZEN INVOLVEMENT**

As described earlier, citizen involvement will be sought in the development, implementation and evaluation stages of the City's plan. This will be accomplished in the following manner:

Consolidated Plan Development: Citizens will be invited to provide input into development of the Five-Year strategic plan, including identification of needs and setting of priorities, through Citizen Advisory meetings, public meetings and/or community meetings and public comment period, as scheduled by the City of Napa.

Implementation: Citizen involvement in the program implementation shall be in the form of advisory meetings, public meetings and/or community meetings, as scheduled by the City of Napa.

Evaluation: Citizens will be given the opportunity to review and comment on the entitlement programs, including the opportunity to review evaluation of the program, projects and activities. This will be in the form of public comment period and/or public meetings as applicable.

### **PUBLIC HEARINGS AND MEETINGS**

Citizen Advisory meetings and public meetings shall provide the major source of citizen input on proposed neighborhood improvement programs, activities, policies and procedures. At a minimum, the City will conduct two separate public meetings during the program year in order to address housing and community development needs, development of proposed activities, and review of program performance. To ensure that all City residents have ample opportunity to take notice of all scheduled public meetings, all notices regarding such meetings, including the date, time and location, shall be noticed in accordance with the Brown Act. Materials are available at City Hall and at the Housing Division.

The Council may hold additional meetings as necessary for the Consolidated Plan and/or Annual Plan, CAPER and/or substantial amendments to the adopted Consolidated Plan and/or Annual Plan. All meetings will be noticed in accordance with the Brown Act.

Minutes of all meetings shall be kept by the City in accordance with its standard practice. Copies of minutes shall be available on request, in accordance with City's adopted practice.

### **PROGRAM AMENDMENTS – DEFINITION OF SUBSTANTIAL AMENDMENT**

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U.S. Department of Housing and Urban Development regulations state that a grantee shall amend its Consolidated Plan and/or Annual Plan whenever it decides to make a change in allocation priorities or in the method of distributing funds, to carry out an activity not previously described, or to substantially change the purpose, scope, location, or beneficiaries of an activity. Furthermore, the grantee is required to develop and make public its criteria for what constitutes a substantial change.

A substantial change is herein defined as any amendment that changes program beneficiaries, the location of approved activities or major budget shifts between approved activities. A major budget shift is defined as an increase or decrease in budget of more than 25% of the current year entitlement funding. In the event that an amendment to the Consolidated Plan and/or Annual Plan qualifies as a substantial change, citizens will be given an opportunity to participate in the planning process. This opportunity will be afforded to the citizens in the following manner:

- Publication of Information for 30-day Comment Period
- Adoption of change through public process, as outlined above
- Publication of 30-day comment period and notification of public meeting may run concurrently.

In response to coronavirus, as allowed under the Coronavirus Aid, Relief and Economic Security Act (CARES Act), the City is utilizing waivers authorized by HUD for the fiscal year 2019 and 2020 CDBG grants. Under these waivers, the City is using a reduced public comment period of no less than 5 days which can run concurrently with amendments made to this Citizen Participation Plan. The City shall follow this temporary process for public comment periods until HUD has suspended the waivers.

All substantial amendments to the Consolidated Plan and/or Annual Plan and any and all amendments to the Citizen Participation Plan will be reviewed by and must receive approval from the City Council.

### **CITIZEN SERVICE REQUESTS AND GRIEVANCE PROCEDURE**

Citizens should be aware that any questions or grievances regarding entitlement programs and projects can be submitted to the Housing Division. During the actual development of the Consolidated Plan and/or Annual Plan submission, written concerns or complaints regarding the Plan shall initiate a written response indicating assessment of the complaint and/or proposals and actions taken to address the complaints and/or proposals before final submission of the Plan to HUD as outlined in “B. Written Comments”. The City shall ensure that reasonable attempts are made to respond to questions or complaints in a timely manner, usually within fifteen (15) working days after receipt of the inquiry.

If complaints are not addressed at the City level, citizens may forward such concerns or complaints to HUD. Although HUD will consider objections submitted at any time, such objections should be submitted within thirty (30) days of the submission of either the Consolidated Plan, Annual Plan or CAPER to HUD. Any written inquiries submitted to HUD should be addressed as follows:

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U.S. Department of Housing and Urban Development  
San Francisco Regional Office  
Office of Community Planning and Development  
One Sansome Street, Suite 1200  
San Francisco, CA 94104

Objections submitted to HUD must meet one or more of the following criteria:

- The description of needs and objectives are plainly inconsistent with available facts and data.
- The activities to be undertaken are plainly inappropriate to meeting the needs and objectives identified by the applicant jurisdiction.
- The submission does not comply with specific requirements or law.
- The submission proposes the undertaking of ineligible activities.