

CITIZEN PARTICIPATION PLAN
CITY OF ODESSA, TEXAS
2015-2019 Consolidated Plan



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Table of Contents

A. Introduction	1
Purpose	1
Lead Agency.....	1
Effective Date	1
B. Encouragement of Citizen Participation	1
Introduction	1
Encouragement of Participation of Disadvantaged Groups	2
Timely and Easy Access to Information	2
C. Citizen Participation Plan	3
Consolidated Plan Development	3
a. Stakeholder Consultation and Citizen Outreach.....	3
b. Public Hearings.....	3
c. Public Notice	4
d. Technical Assistance.....	4
e. Determination of Activities and Funding	4
f. Potential Displacement of Persons.....	5
Plan Amendments	5
Consolidated Annual Performance and Evaluation Report (CAPER)	7
Assessment of Fair Housing Development.....	7
a. Stakeholder Consultation and Citizen Outreach.....	7
b. Public Hearing.....	8
c. Public Display and Comment Period.....	8
d. Comments Received on the Draft Assessment of Fair Housing	8
D. Availability to the Public	8
E. Access to Records	9
F. Complaints.....	9

City of Odessa Amended Citizen Participation Plan

A. Introduction

Purpose

This Citizen Participation Plan (CPP) outlines the public participation process that will be used by the City of Odessa in the planning and implementation of housing and community development programs and activities funded by the Community Development Block Grant (CDBG). This process is undertaken in accordance with U.S. Department of Housing and Urban Development (HUD) regulations found in 24 CFR Part 91. This Citizen Participation Plan presents the City's plan for providing for and encouraging all citizens to participate in the development, revision, amendment, adoption, and implementation of the CPP, Consolidated Plan, Assessment of Fair Housing, Annual Action Plan and the Consolidated Annual Peerformance Evaluation Report (CAPER).

Lead Agency

The Community Development Department is the lead agency for the administration of the CDBG Program and the development of the Consolidated Plan, Annual Action Plan and Consolidated Annual Performance and Evaluation Report (CAPER), as well as the Assessment of Fair Housing.

Effective Date

Subsequent to approval of this CPP by the City, the CP shall be effective until the City amends or replaces it.

B. Encouragement of Citizen Participation

Introduction

The overall goal of community planning and development programs covered by HUD's consolidated planning rule in 24 CFR Part 91 is to develop viable urban communities by providing decent housing and a suitable living environment and expanding economic opportunities principally for low and moderate -income persons. Citizens of Odessa are encouraged to participate in the development of housing and community development programs. This participation is of great use to the City in identifying needs, developing priorities, and assessing effectiveness of ongoing activities and programs.

City of Odessa Amended Citizen Participation Plan

Encouragement of Participation of Disadvantaged Groups

Participation by low and moderate-income persons, residents of blighted areas, residents of predominantly low and moderate-income neighborhoods and of public housing, by minorities, by non-English speaking persons, and by persons with disabilities is especially encouraged.

When the Community Development Department is notified that non-English speaking persons are interested in participating in a community development meeting, translation assistance will be provided. Any non-English speaking resident who wishes to participate may contact the Community Development Department prior to the meetings so that adequate arrangements can be made. Such requests should be made at least five (5) working days prior to the hearing date to permit the City to make the necessary arrangements.

When accommodations are request by a person with a disability in order to participate in a community development meeting, the Community Development Department will make all reasonable efforts to make that accommodation. Such requests should be made at least five (5) working days prior to the hearing date to permit the City to make the necessary arrangements.

Timely and Easy Access to Information

The City of Odessa will provide citizens, public agencies, and other interested persons with reasonable and timely access to information and records relating to housing and community development plans and programs and use of housing and community development funds. There will be open access to all meetings. Documents related to Odessa housing and community development programs will be made available to citizens upon request. Information will also be available to the public through the City of Odessa website and news media, and will be available at City Hall. The City will post all draft and final copies of plan documents on its website.

Individuals who have a concern or complaint on housing or community development programs should contact the City of Odessa Community Development at P.O Box 4398, Odessa, Texas 79760 or by phone - 432 335-4820. Persons making telephone calls will be provided a verbal or written response as determined by the Department. Persons submitting written complaints will be provided written responses within 15 working days, where possible.

City of Odessa Amended Citizen Participation Plan

C. Citizen Participation Plan

Consolidated Plan Development

The City's Community Development Department will be the lead agency for developing the Consolidated Plan, Annual Action Plan and Consolidated Annual Performance and Evaluation Report (CAPER).

a. Stakeholder Consultation and Citizen Outreach

The Department will consult with appropriate City, County, and State departments and agencies and with housing, community development and human services organizations, neighborhood organizations and the public at large including, but not limited to, the following groups:

1. Local public housing authorities
2. Other affordable housing providers
3. Social service providers including those focusing on services to minorities, families with children, the elderly, veterans, persons with disabilities, persons with HIV/AIDS and their families, homeless persons, and other protected classes
4. Community-based and regionally-based organizations that represent protected class members and organizations that enforce fair housing laws
5. Organizations and agencies involved in non-housing community development issues, including transportation, economic development, schools, etc.
6. Internet service providers
7. Organizations engaged in narrowing the digital divide
8. Agencies responsible for the management of flood prone areas, public land or water resources
9. Emergency management agencies

Community Development will develop and host an on-line citizen survey. Data and information collected from stakeholders will supplement quantitative data analysis and review of City documents and policies.

b. Public Hearings

Community Development will hold at least one public hearing to seek input on housing and community development needs and possible activities and programs for the planning period. There will be open access to all meetings and ensure reasonable accommodation for disabled persons.

City of Odessa Amended Citizen Participation Plan

The second public hearing will be conducted during or after the 30-day public comment period during which the City will address identified housing and community development needs, proposed goals, proposed eligible activities, and proposed strategies and actions.

c. Public Notice

Notice of date time and place of the meetings will be given in the Odessa American newspaper at least two weeks prior to the meeting date or document review period. The notices will include date, location, and a summary regarding the information to be presented at the public hearing or forum. The notices shall be posted in the City of Odessa website.

d. Technical Assistance

The City of Odessa community development staff is available to assist any person or organization requesting assistance in applying for funding for the CDBG program. All potential applicants are strongly encouraged to contact the Community Development Department for more information on application requirements before initiating a request for funding.

e. Determination of Activities and Funding

The Community Development Department will provide technical assistance to groups that are representative of persons of low and moderate-income in developing proposals for funding. The level of assistance to be determined by the Department based on available staff resources. This assistance will not guarantee the provision of funds to the groups.

The Department shall be responsible for determining if a proposal for an activity is eligible for inclusion in the Annual Action Plan in light of 1) the criteria for meeting a National Objective of the CDBG Program, 2) eligibility requirements for activities under HUD regulations, and 3) the specific objectives of the Consolidated Plan.

The Department will be responsible for evaluating proposals considered for inclusion in the Annual Action Plan and may employ ad hoc advisors consisting of persons knowledgeable of housing and community development programs to assist in this evaluation of proposals. The public will be given an opportunity to make comments to the Department and ad hoc advisors on all proposed projects and programs at one or more public meeting(s) for that purpose. Notice of the date, time and place of the meetings shall be given in a newspaper of general circulation within the City at least two weeks prior to the meeting(s) date.

The Department will propose an Annual Action Plan with funding levels for projects and programs, and recommend that plan to the Mayor and City Council. Public notice will be

City of Odessa Amended Citizen Participation Plan

given that the plan is available for review, and how to obtain a copy of the proposed plan. The recommended Plan will be available to persons interested in housing and community development, made available at City Hall on the City's website, and distributed by other available methods.

f. Potential Displacement of Persons

The City of Odessa will also follow HUD Handbook 1378 on policies for displaced persons due to relocation funded in whole or in part by HUD funds. The handbook consolidates basic requirements and HUD policy guidance on acquisition and relocation under the Uniform Relocation Act of 1974 and Section 104 (d) of the Housing and Community Development Act of 1974. These requirements and policies are to be followed when acquiring real property or displacing persons for a project or program with HUD financial assistance.

Plan Amendments

The City of Odessa may amend its Consolidated Plan as the need arises. Any substantial amendments to the Consolidated Plan or Annual Action Plan will provide for a 30-day public comment period. Citizens will be provided with reasonable notice and an opportunity to comment on the proposed amendment.

Notice of the proposed amendment, a summary of its contents, the instructions on how to receive a copy of the amendment, and the final date for submission of written comments will be published in the Odessa American newspaper at least 30 days prior to the City Council meeting at which the change will be considered. Copies of the proposed amendments will be made available at City Hall, on the City's website.

For CDBG funding under FY 2019-2020, FY 2020-2021, and the Coronavirus Aid, Relief, and Economic Security Act or CARES Act, participating cities may provide a 5-day notice of a proposed off-cycle change or substantial amendments beginning April 20, 2020 as allowed under a HUD waiver.

The following criteria will be used to determine whether a change is substantial enough to warrant an amendment to the Consolidated Plan or Action Plan:

- New Activity- a previously unidentified activity (based on HUD's Matrix Code system) will receive funding allocation to undertake an activity allowed under program rules and regulations.

City of Odessa Amended Citizen Participation Plan

- Change in Activity-using the IDIS HUD Matrix Code, if the allocation of funding requires a change from one numeric code to another numeric code to undertake an activity under the program rules and regulations. An example would be moving funds between 03A (Senior Center) to 16A (Historic Preservation) would require an amendment to the Consolidated Plan.
- Change in Activity Location- unless identified in the Action Plan as a citywide activity, a new or different specific activity location has been identified other than the location that has been previously identified in the plan.
- Cancellation of Funding Allocation- funding for a previously identified activity, program or project is canceled as originally state in the plan.
- Change in Funding Allocation – an identified activity requires an increase or decrease in funding which exceeds fifty (50) percent of the original funding allocation.
- Emergency Action Plan Amendments- it may be necessary to amend the Action Plan in response to emergencies. Notice of proposed emergency changes will be published in the newspaper at least 7 days prior to the City Council meeting at which the change will be considered.

For CDBG funding under FY 2019-2020, FY 2020-2021, and the Coronavirus Aid, Relief, and Economic Security Act or CARES Act, participating cities may provide a 5-day notice of a proposed off-cycle change or substantial amendments beginning April 20, 2020 as allowed under a HUD waiver.

The City Council will review and comment on all proposed substantial changes. Notice of proposed substantial changes will be distributed to the news media, distributed to persons interested in housing and community development, published in a newspaper of general circulation within the City at least 30 days prior to the City Council meeting at which the change will be considered. The City Council will consider all comments on the proposed change prior to taking action. The City Council may make the proposed change, reject the proposed change, or make a modified change.

A copy of the amended Consolidated Plan or Annual Action Plan, including a summary of all written comments and those received during the public hearing will be made available for public review and submitted to HUD. This will include an explanation of any written comments and other public comments not accepted by the City Council.

City of Odessa Amended Citizen Participation Plan

Consolidated Annual Performance and Evaluation Report (CAPER)

The Community Development Department will be responsible for preparing all reports on the programs and activities including the Consolidated Annual Performance and Evaluation Report (CAPER). Prior to submitting the CAPER (annual performance report) to HUD, copies will be available for public comment. Notice of the availability of the report will be published in the Odessa American at least 15 days prior to the Mayor and City Council conducting a public hearing on the CAPER.

Prior to submitting the report to HUD, the Mayor and City Council will consider any comments or views of its citizens received in writing, or orally at the public hearings on the annual performance report (CAPER). The City will attach to the final submission of the CAPER a summary of these comments or reviews.

Assessment of Fair Housing Development

The following sections provide information on citizen outreach specific to the development of the Assessment of Fair Housing (also known as the Analysis of Impediments), following HUD requirement under 24 CFR 91 and best practices and guidance:

a. Stakeholder Consultation and Citizen Outreach

The Department will consult with appropriate City, County, and State departments and agencies and with housing, community development and human services organizations, neighborhood organizations and the public at large including, but not limited to, the following groups:

1. Local public housing authorities
2. Other affordable housing providers
3. Social service providers including those focusing on services to minorities, families with children, the elderly, veterans, persons with disabilities, persons with HIV/AIDS and their families, homeless persons, and other protected classes
4. Community-based and regionally-based organizations that represent protected class members and organizations that enforce fair housing laws
5. Organizations and agencies involved in non-housing community development issues, including transportation, economic development, schools, etc.

The Department will develop and host an on-line citizen survey. Data and information collected from stakeholders will supplement quantitative data analysis and review of City documents and policies.

City of Odessa Amended Citizen Participation Plan

b. Public Hearing

To obtain the views of the public on furthering fair housing in the City's housing and community development programs, the City will conduct at least one public hearing before the draft AFH/AI is published for public comment. This hearing may be part of the public hearing for the Consolidated Plan. Notice of the date, time and place of the meetings shall be given in the Odessa American newspaper at least two weeks prior to the meeting(s) date.

c. Public Display and Comment Period

The draft AFH/AI will be placed on display for a period of no less than thirty (30) calendar days to encourage public review and comment. The public notice shall include a brief summary of the content and purpose of the draft AFH/AI, the dates of the public display and comment period, the locations where copies of the proposed document can be examined, how comments will be accepted, when the document will be considered for action by the City Council, and the anticipated submission date to HUD.

d. Comments Received on the Draft Assessment of Fair Housing

Comments may be sent to the Senior Community Development Specialist or his /her designee will accept all public comments, during the 30-day public display and comment period. The City will consider any public comments or views received in writing, or orally at the public hearings, in preparing the final AFH/AI. Individuals may also request assistance on how to comment on the AFH/AI. A summary of these comments or views, and a summary of any comments or views not accepted and the reasons why, will be attached to the final AFH/AI for submission to HUD.

D. Availability to the Public

The City will make the following documents available for public access, at a minimum: Citizen Participation Plan, Consolidated Plan, Revisions to the Consolidated Plan, CAPER and Assessment of Fair Housing.

The City of Odessa will provide citizens, public agencies, and other interested persons with reasonable and timely access to information and records relating to housing and community development plans and programs and use of housing and community development funds.

Documents related to Odessa community development programs will be made available to citizens upon request. Every reasonable attempt shall be made to accommodate persons with disabilities and assist them in obtaining requested document. Citizens will have access to a reasonable number of copies that may also be available by downloading documents on the City of Odessa website.

City of Odessa Amended Citizen Participation Plan

E. Access to Records

The City will provide the public with reasonable and timely access to information and records relating to the data or content of the CP and the Assessment of Fair Housing (AI), as well as the proposed, actual, and past use of funds covered by this CPP. The law requires reasonable public access to records about previous expenditures during the past five years, and reasonable public access to records relating to the expenditure of funds during the previous five (5) program years.

F. Complaints

Individuals who have a concern or complaint on housing or community development programs should contact the Community Development Department. Persons making telephone calls will be provided a verbal or written response as determined by the Department. Persons submitting written complaints will be provided written responses within 15 working days, where possible.

Residents wishing to object to HUD approval of the final Consolidated Plan may send written objection to the HUD Field Office, Community Planning and Development Division, U.S. Department of Housing and Urban Development, 801 Cherry Street, Unit #45, Suite 2500, Fort Worth, Texas 76102

G. Contact Information

All communication regarding the Consolidated Plan, the Assessment of Fair Housing, the Annual Action Plan, the Consolidated Annual Performance and Evaluation Report (CAPER), comments, complaints, reasonable accommodation requests, translation services, or any related element regarding HUD funding, programs, and requirements should be directed to:

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