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RESOLUTION NO. 2267

**A RESOLUTION OF THE CITY OF LARGO, FLORIDA,
AMENDING THE CITIZEN PARTICIPATION PLAN FOR THE
COMMUNITY DEVELOPMENT BLOCK GRANT PROGRAM TO
INCORPORATE ALTERNATIVE MINIMUM PUBLIC NOTICE
AND PUBLIC MEETING REQUIREMENTS AND AVAILABILITY
OF DOCUMENTS AND RECORDS DURING DISASTER OR
EMERGENCY DECLARATION EVENTS; AUTHORIZING THE
SUBMITTAL OF THIS RESOLUTION TO THE UNITED STATES
DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT
(HUD); AND PROVIDING AN EFFECTIVE DATE.**

WHEREAS, the Largo City Commission adopted Resolution No. 1939 approving the current Community Development Block Grant (CDBG) Citizen Participation Plan which provides public meeting and notification procedures for the City of Largo's programs funded by the US Department of Housing and Urban Development (HUD); and

WHEREAS, the amendments to the Citizen Participation Plan establish alternative requirements for public notices, public meetings and availability of documents and records during a disaster or emergency declaration event; and

WHEREAS, HUD released a memorandum dated April 9, 2020, that permits jurisdictions to amend Citizen Participation Plans to incorporate expedited procedures for amending Citizen Participation Plans, Consolidated Plans and Actions plans in the event of a disaster or emergency declaration;

WHEREAS, HUD's memorandum dated April 9, 2020 further stated that these alternative procedures could be utilized concurrently with adoption of the procedures into the Citizen Participation Plan;

WHEREAS, the amendment to the Citizen Participation Plan incorporates minimum public notice requirements, virtual meeting requirements, and availability of public documents and records that would be applicable during a disaster or emergency declaration event;

WHEREAS, the Community Development Advisory Board recommended approval of the amendments to the Citizen Participation Plan on May 18, 2020; and

WHEREAS, in accordance with alternative public noticing requirements during the emergency disaster declaration for the rare coronavirus disease COVID-19 (DR-4486), the City advertised a five-day public comment period to allow the public to provide input on the amendments to the Citizen Participation Plan; and

WHEREAS, the City Commission held a formal public hearing to obtain the views of citizens on the amendments to the Citizen Participation Plan on June 2, 2020.

NOW, THEREFORE, BE IT RESOLVED BY THE LARGO CITY COMMISSION THAT:

SECTION 1. The amendments to the City's Citizen Participation Plan as set forth in Exhibit A attached hereto and incorporated herein by reference, are hereby approved to be submitted to HUD.

SECTION 2. The City Manager or his designee and the City Attorney are authorized and directed to execute all documents necessary in order to effectuate the intent and purpose of this Resolution upon approval by HUD.

53 **SECTION 3.** This Resolution shall take effect immediately upon adoption.

54
55 PASSED AND APPROVED THIS _____ DAY OF _____, 2020.

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58 CITY OF LARGO, FLORIDA

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61 _____
62 Mayor

63 ATTEST:

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65

66 _____
67 City Clerk

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69 REVIEWED AND APPROVED:

70 _____
71 City Attorney

Citizen Participation Plan



City of Largo

Community Development Department

CITY OF LARGO

U.S. DEPARTMENT

OF HOUSING AND URBAN DEVELOPMENT PROGRAMS

CITIZEN PARTICIPATION PLAN

COMMUNITY DEVELOPMENT DEPARTMENT
LARGO, FLORIDA

June 1988

Amended September 1990 (Resolution No. 1400)

Amended October 18, 2005 (Resolution No. 1888)

Amended January 22, 2008 (Resolution No. 1939)

Amended March 19, 2019 (Resolution No. 2230)

Planned Amendment June 2, 2020 (Resolution No. 2267)

CITY OF LARGO
COMMUNITY DEVELOPMENT DEPARTMENT
HOUSING DIVISION
Physical Address: 201 Highland Avenue, Largo, FL 33770
Mailing Address: PO Box 296, Largo, FL 33779

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INTRODUCTION

The Citizen Participation Plan provides the policies and procedures for citizen participation for the various plans and reports required by the City for its housing and community development grants. Adoption of a Citizen Participation Plan, pursuant to 24 CFR 91.105, is required by the U.S. Department of Housing and Urban Development (HUD) for the Community Development Block Grant (CDBG) program and the HOME Investment Partnership Program, which provide annual funding to the City of Largo.

The City of Largo intends to aid in facilitating citizen-devised solutions to neighborhood problems. The Citizen Participation Plan provides a vehicle for mutual problem solving which is essential to the neighborhood's sense of vitality and cohesiveness. The Citizen Participation Plan is designed to provide an effective means of involvement from its citizens, including minority and non-English speaking persons, as well as persons with disabilities. The City will also seek participation by low- and moderate-income persons, especially within the designated CDBG Target Area and other areas within significant slum and blight conditions in accordance with 24 CFR 570.2018(b)(1), and/or high concentration of low- and moderate-income persons.

Below is a summary of the two sections of this document as they pertain to the federal and state programs:

CITIZEN PARTICIPATION REQUIRED FOR FEDERALLY FUNDED PROGRAMS (24 CFR 91.105):

- Citizen Participation Plan and amendments;
- Assessment of Fair Housing (AFH) and consequent revisions to the AFH;
- Five-Year Consolidated Plan and substantial amendments;
- Annual Action Plan and substantial amendments; and
- Consolidated Annual Performance and Evaluation Report (CAPER).

CITIZEN PARTICIPATION OBJECTIVES

The Citizen Participation Plan will seek to:

- Provide for and encourage citizen participation to identify community needs, with particular emphasis on participation by persons of low- and moderate-income who are residents of slum and blighted areas and of areas in which funds are proposed to be used, and provide for participation of residents in low- and moderate-income neighborhoods as defined by the City of Largo.
- Encourage participation of minorities, non-English speaking persons, limited English proficiency persons, and persons with disabilities.
- Provide citizens with reasonable and timely access to local meetings, public hearings, information and records relating to the City's federal and state housing and community development programs.
- Encourage the participation of local and regional institutions and other organizations in the process of identifying community needs and implementing projects and programs.

- Provide technical assistance to groups representative of persons of low- and moderate-income that request such assistance in developing proposals with the level and type of assistance to be determined by the City.
- Provide for timely written responses to written complaints and grievances.

COMMUNITY DEVELOPMENT ADVISORY BOARD (CDAB)

The City of Largo will utilize the Community Development Advisory Board (CDAB) as a vital component to fostering citizen participation. This citizen-based Board includes residents from various geographic locations and income levels and provides recommendations to the City Commission through the phases of planning for housing and community development programs. Members of the Board are appointed by the Mayor and City Commissioners. The responsibilities of the CDAB that relate to the funding sources are outlined below.

The CDAB shall advise and make recommendations to the City Commission on the following items:

- CDBG Consolidated Plans;
- Assessments of Fair Housing;
- Annual pre-planning input on priorities for funding;
- Subrecipient and program funding allocations for CDBG Annual Action Plans;
- Major amendments to the plans listed above;
- Amendments to the Citizen Participation Plan;
- Other significant plans or policy changes related to the funding sources.
- Provide feedback on the CDBG Consolidated Annual Performance and Evaluation Report (CAPER).

CITIZEN PARTICIPATION REQUIRED FOR FEDERALLY FUNDED PROGRAMS (24 CFR 91.105)

CITIZEN PARTICIPATION PLAN

The City of Largo will provide public notice of the proposed Citizen Participation Plan and any amendments to the Citizen Participation Plan prior to adoption.

- a. Publish a 30-day public comment period in a newspaper of general circulation in legible print and in a section of the newspaper other than the legal section. The notice and plan will also be posted on the City's website. The notice will provide sufficient information about the plan and/or amendment to allow for informed comment. The notice shall include the location for viewing the plan, indicate the dates of the comment period and instructions for transmitting comments to the City of Largo's Housing Division.

- b. Upon request, the Citizen Participation Plan will be provided in alternative formats to accommodate people with disabilities (ex. large print for the visually impaired), for minority populations and persons with limited English proficiency.
- c. Community Development Advisory Board (CDAB) makes a formal recommendation to the Largo City Commission. This step can be completed before, during or after the 30-day public comment period.
- d. City Commission approve the Plan/amendments by resolution. This step must be completed after the 30-day public comment period.
- e. In the event of a disaster or a declaration of emergency, public notice will be altered to follow HUD issued waivers or notices. If HUD waivers or notices are not provided, the City of Largo will, at minimum, provide notice of proposed citizen participation plan and amendments on the City's website and allow a 5-day period for public comments prior to adoption.
- f. Virtual Public Meetings or Hearings: If City of Largo offices are closed due to a disaster or declaration of emergency, virtual public meetings and hearings may be used to fulfill applicable public hearing requirements instead of in-person meetings. Real-time responses and accommodations for persons with disabilities and/or limited English proficiency will be made available to the greatest extent possible.

ASSESSMENT OF FAIR HOUSING (AFH)

HUD has suspended requirements of jurisdictions to complete and AFH. The City will continue to perform an Analysis of Impediments to Fair Housing every five years. Should HHUD re-enact the requirements for the AFH, the process outlined below will be used.

The AFH requires data analysis, consultation with agencies and public input to determine the scope and scale of fair housing issues in the community. As a member of the Pinellas County Consortium for the CDBG Program, the City of Largo will perform this assessment in partnership with Pinellas County. The AFH is completed prior to the Consolidated Plan and strategies to address the fair housing issues should be integrated into the Consolidated Plan.

- a. The AFH requires two public hearings and a public comment period.
- b. *Publishing Data:* At the beginning of the AFH process, or as soon as data is available, the City will make HUD-provided data and other data used in the development of the AFH available to the public. HUD-provided data will be made available by cross-referencing to the data on HUD's website.
- c. *Consultation:* Consultation includes but is not limited to the following:
 - i. Public housing authorities, including residents, resident advisory boards, resident councils, and resident management corporations;
 - ii. Other providers of assisted housing, health services and social services, including those focusing on services to children, elderly persons, persons with disabilities, persons with HIV/AIDS and their families, and homeless persons;

- iii. Community-based and regionally-based organizations that represent protected class members and organizations that enforce fair housing laws, such as state or local fair housing enforcement agencies; and
- iv. Regional government agencies, adjacent units of local government and local government agencies, including local government agencies with metropolitan-wide planning and transportation responsibilities.

Consultation with these agencies could include, but is not limited to, public meetings, City staff attendance at regular meetings of other agencies (ex. Continuum of Care meetings), surveys, review of plans and reports, telephone calls, workshops, and public hearings.

d. *First Public Hearing:*

- i. A public hearing will be held during development of the AFH prior to the public comment period to obtain views of citizens on the AFH data and affirmatively furthering fair housing. This hearing can be facilitated by the City of Largo; however, due to the extent of outreach involved with this hearing, the City intends to work closely with Pinellas County to hold a joint public hearing.
- ii. The meeting should be held at a convenient time and location for stakeholders and reasonable accommodation should be made for persons with physical disabilities. Upon request, provisions will be made for the special needs of non-English speaking persons, as well as for the visually and hearing impaired and persons with physical disabilities. Evening meetings will begin no earlier than 6:00 PM and will be held at a City or County public facility or other public building.
- iii. A notice shall be published in a newspaper of general circulation, in legible print, and in a section of the newspaper other than the legal section at least 15 days prior to the public hearing. The notice will provide a reasonable explanation of the subject of the hearing, date, time and place and will state that reasonable accommodations will be provided for persons with disabilities and non-English speaking residents. Other methods should be used to advertise this hearing, such as email lists, websites, local news channels, and agency newsletters.

e. *Public Comment Period:* A 30-day public comment period will be published in a newspaper of general circulation, in legible print, and in a section of the newspaper other than the legal section. The public comment period will also be advertised on the City's website. The website contains functionality to translate the website text into multiple languages. The notice shall include:

- i. A summary of the proposed AFH and the provision of the public comment period;
- ii. The summary will describe the contents and purpose of the AFH and will include a list of the locations where copies of the entire proposed AFH may be reviewed. At a minimum, display locations will be provided on the City's website, at Largo City Hall and the Largo Public Library;
- iii. A reasonable number of free copies of the AFH will be provided to citizens and groups that request them.

g. In the event of a disaster or a declaration of emergency, public notice will be altered to follow HUD issued waivers or notices. If HUD waivers or notices are not provided, the City of Largo will, at minimum, provide notice of proposed AFH and amendments on the City's website and allow a 5-day period for public comments prior to adoption.

e.h. *CDAB Meeting:* The AFH will be presented to the CDAB for review and recommendation to the City Commission. Notice for this meeting will be included in the standard website meeting notice for the CDAB. This meeting may be held before, during or after the public comment period.

f.i. *Second Public Hearing:* A public hearing shall be held by the Largo City Commission after the 30-day public comment period.

- i. The purpose of this hearing is to provide another opportunity for public comment on the AFH prior to City Commission approval and submittal to HUD.
- ii. A notice shall be published in a newspaper of general circulation, in legible print, and in a section of the newspaper other than the legal section noticing this public hearing at least 15 days prior to the public hearing. The notice will provide a reasonable explanation of the subject of the hearing, date, time and place and will state that reasonable accommodation will be provided to persons with disabilities and non-English speaking residents. Notice for this public hearing can be included in the published 30-day public comment period notice.
- iii. The hearing will be held in the Largo City Commission Chambers at Largo City Hall or such other place as the City Commission designates.

iv. The City Commission will approve the AFH by resolution at the second public hearing.

v. Virtual Public Meetings or Hearings: If City of Largo offices are closed due to a disaster or declaration of emergency, virtual public meetings and hearings may be used to fulfill applicable public hearing requirements instead of in-person meetings. Real-time responses and accommodations for persons with disabilities and/or limited English proficiency will be made available to the greatest extent possible.

iv-vi.

h. *Comments on the AFH:* All comments and views of citizens received in writing, or orally at public hearings, will be considered in preparing the final AFH. A summary of these comments or views and a summary of any comments or views not accepted and the reasons for such, will be attached to the final AFH.

FIVE-YEAR CONSOLIDATED PLANS/ANNUAL ACTION PLANS

The Consolidated Plan permits the community to holistically address needs that it perceives to be of the greatest consequence. Input into the process will come not only from affected residents, but interested organizations, public agencies, the private sector, City staff and other community stakeholders. All interested parties are encouraged to participate in the development of the plan. The Consolidated Plan is developed every five years with the exception of the Action Plan portion of the Plan that is resubmitted to HUD by the City of Largo on an annual basis.

a. *First Public Hearing:* A public hearing will be held during the planning process prior to publishing the draft Consolidated Plan/Annual Action Plan. The purpose of this hearing is to obtain input from

stakeholders regarding community needs including, but not limited to: housing and homeless needs, non-housing community development needs, barriers to affordable housing, anti-poverty measures, institutional structures, and coordination of housing activities. This hearing will also include a review of program performance. The public hearing can be part of a CDAB meeting or held as a separate meeting.

- i. A notice shall be published in a newspaper of general circulation, in legible print, and in a section of the newspaper other than the legal section at least 15 days prior to the public hearing. The notice will provide a reasonable explanation of the subject of the hearing, date, time and place and will state that reasonable accommodation will be provided for persons with disabilities and non-English speaking residents. Other methods should be used to advertise this hearing, such as email lists, websites, local news channels, and agency newsletters.
 - ii. The meeting should be held at a convenient time and location for stakeholders and reasonable accommodation should be made available for persons with physical disabilities. Upon request, reasonable accommodations will be made for the special needs of non-English speaking persons, as well as for the visually and hearing impaired. Evening meetings will begin no earlier than 6:00 PM and will be held at a City or County public facility or other public building.
- b. *Notice of Funding Availability (NOFA):* The NOFA is published to announce anticipated funding availability for the next program year and coincides with the opening of the subrecipient application period. The NOFA will be published in a newspaper of general circulation, in legible print and in a section of the paper other than the legal section. Additional notices of the NOFA may be provided on the City's website, newsletters, mailings, and special notices to interested agencies, groups and persons. The NOFA should include the following information:
- i. *Anticipated Funding Availability:* Unless actual funding allocations have been announced by HUD for the following program year, estimated funding amounts shall be included in the NOFA;
 - ii. *Subrecipient Application Information:* funding priorities, how to access the subrecipient application, general project eligibility information and application deadlines; and
 - iii. *Technical Assistance:* Contact information for technical assistance on the applications. If the City schedules a technical assistance training session, this session should be advertised in the NOFA.
- c. *CDAB Meetings:* The CDAB will be involved in making funding recommendations for subrecipients and making recommendations on the final Consolidated Plan/Action Plan as follows:
- i. Hold subrecipient application presentations and make funding recommendations to the City Commission for incorporation in the Consolidated Plan/Action Plan.
 - ii. Review and provide recommendation to the City Commission for adoption of the Consolidated Plan/Action Plan.

- iii. Notice for CDAB meetings will be included in the standard website meeting notice for the CDAB. The CDAB meeting may be held before, during or after the 30-day public comment period (below), but must occur prior to approval by the City Commission.
- d. *Public Comment Period:* Once the Consolidated Plan/Action Plan has been drafted, including preliminary funding recommendations for projects, activities and programs for the upcoming fiscal year, the following will be published in a newspaper of general circulation, in legible print and in a section of the newspaper other than the legal section:
- i. A summary of the proposed Consolidated Plan/Action Plan; the amount of assistance the City expects to receive (including grant funds and program income); the estimated amount of grant funds that will benefit persons of low- and moderate-income; a statement of the City's plan to minimize displacement of persons and to assist any persons displaced; and the provision of the public comment period.
 - ii. The summary will describe the contents and purpose of the Consolidated Plan/Action and will include a list of the locations where copies of the entire proposed Plan may be examined. At a minimum, display locations will include Largo City Hall, Largo Public Library and the City of Largo's website.
 - iii. A reasonable number of free copies of the Plan and displacement information will be provided to citizens and groups that request it.
 - iv. A period of not less than 30 days after the published notice will be provided for public comments.
 - v. All public comments or views received in writing, or orally at public hearings, will be considered in preparing the final Consolidated Plan/Action Plan. A summary of these comments or views and a summary of any comments or views not accepted and the reasons for such will be attached to the final Consolidated Plan/Action Plan.
 - vi. In the event of a disaster or a declaration of emergency, public notice will be altered to follow HUD issued waivers or notices. If HUD waivers or notices are not provided, the City of Largo will, at minimum, provide notice of proposed Consolidated Plan/Action Plan on the City's website and allow a 5-day period for public comments prior to adoption.
- ~~vi.~~
- e. *Additional Consultation:* In addition to resident input, each funding source includes requirements for consulting with area agencies and population groups in the community.
- i. The following methods may be used to consult with such agencies:
 - Invitations to public meetings;
 - Staff attendance at other public input meetings;
 - One-on-one interviews;
 - City staff review of agency reports and plans;

- Ongoing staff participation in agency meetings and work groups; and
 - Surveys
- ii. Consultation with agencies should be documented.
 - iii. Refer to the most recent Consolidated Plan/Action Plan requirements from HUD to determine which agencies/community groups are required to be consulted. Other stakeholders specific to the needs of the community may also be consulted.
- f. *Second Public Hearing:* After the public comment period, a public hearing will be held on the Consolidated Plan/Action Plan and proposed activities by the City Commission. This public hearing is held as part of the hearing by the City Commission to adopt the Consolidated Plan/Action Plan.
- i. The purpose of the hearing is to provide an opportunity for public comment on the Plan and proposed activities to the City Commission prior to approval by the City Commission.
 - ii. A public notice will be published in a newspaper of general circulation at least 15 days prior to the public hearing. The notice will provide a reasonable explanation of the subject of the hearing, date, time and place and will provide contacts to request reasonable accommodation for persons with disabilities and non-English speaking persons. The notice will be published in legible print and in a section of the newspaper other than the legal section.
 - iii. The public hearing will be held at a regularly scheduled City Commission meeting located at Largo City Hall, or such other place as the Commission designates. The City Commission will take formal action on the Consolidated Plan/Action Plan through adoption by resolution. Upon request, reasonable accommodations will be made for the special needs of persons with disabilities and non-English speaking persons, as well as for the visually and hearing impaired.
 - iv. Virtual Public Meetings or Hearings: If City of Largo offices are closed due to a disaster or declaration of emergency, virtual public meetings and hearings may be used to fulfill applicable public hearing requirements instead of in-person meetings. Real-time responses and accommodations for persons with disabilities and/or limited English proficiency will be made available to the greatest extent possible.

iii.

SUBSTANTIAL AMENDMENTS

- a. *Citizen Participation Plan:* See “Citizen Participation Plan” section of this document, as the process is the same for adoption of the Citizen Participation Plan and amendments to the Plan.
- b. *Consolidated Plan/Action Plan:*
 - i. *Substantial Amendment Criteria:* The following criteria will be used to determine if an amendment constitutes a substantial amendment to the Consolidated Plan/Action Plan:

- a. The use of CDBG funds changes from one eligible activity to another activity that was not included in the Consolidated Plan/Action Plan (including Primary List and Alternate List).
 - b. A substantial change in the purpose, scope, location or beneficiaries of an activity. A substantial change involves any of the following:
 - i. The activity will no longer principally benefit the targeted population as identified in the Action Plan (ex. low- and moderate-income homeowners, homeless persons, etc.);
 - ii. The activity will no longer address the low- and moderate-income need identified in the Action Plan (ex. shelter for homeless, center for senior citizens, etc.) or the activity ceases to address the elimination of slum and blight, in accordance with 24 CFR 270.208, as identified in the Action Plan;
 - iii. The activity location of an area-benefitting activity changes so that the completed activity will principally serve beneficiaries other than those originally intended; or
 - iv. The scope of the activity has increased to the point where its completion with project funds would result in the inability to carry out another approved activity, or would necessitate reducing the scope of another activity to a point where it would not accomplish its intended purpose.
 - c. In the event of a local emergency, such as a natural disaster or other large-scale emergency, funds may be allocated to eligible activities needed to assist in disaster relief without triggering a substantial amendment with approval from the City Commission.
- ii. *Public Comment Period:* A 30-day public comment period will be completed prior to City Commission approval of the amendment. A notice shall be published in a newspaper of general circulation describing the proposed amendment, the availability of any materials regarding the amendment and providing information about the comment period. The notice will provide sufficient information about the amendment to enable informed public comment. The notice will be published in legible print and in a section of the paper other than the legal section. The notice may be published in other locations as appropriate, such as on the City's website or notification to affected entities.
 - iii. All comments or views received during the comment period will be considered prior to preparing the final amendment submitted to HUD. A summary of these comments or views and a summary of any comments or views not accepted and the reasons for such will be attached to the amendment submittal to HUD.
 - iv. The amendment will be approved by the City Commission by resolution and submitted to HUD.
 - v. In the event of a disaster or a declaration of emergency, public notice will be altered to follow HUD issued waivers or notices. If HUD waivers or notices are not provided, the City of Largo will, at minimum, provide notice of proposed Consolidated Plan/Action Plan amendments on the City's website and allow a 5-day period for public comments prior to adoption.

vi. Virtual Public Meetings or Hearings: If City of Largo offices are closed due to a disaster or declaration of emergency, virtual public meetings and hearings may be used to fulfill applicable public hearing requirements instead of in-person meetings. Real-time responses and accommodations for persons with disabilities and/or limited English proficiency will be made available to the greatest extent possible.

iv-vii.

c. *Assessment of Fair Housing Revisions:*

i. The City will revise its previously accepted AFH under the following circumstances:

a. A material change occurs. A material change is a change in circumstances in the City that affects the information on which the AFH is based to the extent that the analysis, the fair housing contributing factors, or the priorities and goals of the AFH no longer reflect actual circumstances. A material change includes, but is not limited to:

- Presidentially declared disasters under Title IV of the Robert T. Stafford Disaster Relief and Emergency Assistance Act (42 U.S.C. 5121 et seq.) in the City that are of such a nature as to significantly impact the steps the City may need to take to affirmatively further fair housing;
- Significant demographic changes;
- New significant contributing factors in the City; and
- A Civil Rights finding, determination, settlement (including Voluntary Compliance Agreements), or court order.

b. Upon HUD's written notification specifying a material change that requires the revision.

ii. *CDAB Meeting:* The CDAB will review and make recommendations to the City Commission regarding the proposed amendment to the AFH. Notice for this meeting will be included in the standard website meeting notice for the CDAB. This meeting may be held before, during or after the public comment period.

iii. *Public Comment Period:* A 30-day public comment period will be completed prior to City Commission approval of the revision. A notice shall be published in a newspaper of general circulation describing the proposed amendment, and the availability of any materials regarding the amendment and providing information about the comment period. The notice will provide sufficient information about the amendment to enable informed public comment. The notice will be published in legible print and in a section of the paper other than the legal section. The notice may be published in other locations as appropriate, such as on the City's website or notification to affected entities.

iv. All comments or views received during the comment period will be considered prior to preparing the final revision submitted to HUD. A summary of these comments or views and a summary of any

comments or views not accepted and the reasons for such will be attached to the amendment submittal to HUD.

v. Public Hearing: The revision will be approved by the City Commission by resolution and submitted to HUD.

vi. In the event of a disaster or a declaration of emergency, public notice will be altered to follow HUD issued waivers or notices. If HUD waivers or notices are not provided, the City of Largo will, at minimum, provide notice of proposed Consolidated Plan/Action Plan amendments on the City's website and allow a 5-day period for public comments prior to adoption.

vii. Virtual Public Meetings or Hearings: If City of Largo offices are closed due to a disaster or declaration of emergency, virtual public meetings and hearings may be used to fulfill applicable public hearing requirements instead of in-person meetings. Real-time responses and accommodations for persons with disabilities and/or limited English proficiency will be made available to the greatest extent possible.

viii.

CDBG ANNUAL PERFORMANCE REPORT

Each year, the City must submit to HUD the Consolidated Annual Performance Report (CAPER) within 90 days of the close of the program year. The CAPER is a performance and financial report for the prior program year.

a. *Public Comment Period:* The City will advertise the availability of the CAPER for viewing by the general public in a newspaper of general circulation. The notice will provide sufficient information about the CAPER to enable informed comment. The notice will be published in legible print and in a section of the newspaper other than the legal section. A 15-day comment period will follow this advertisement. A summary of these comments will be attached to the CAPER for submittal to HUD. Additional notices may be published on the City's website and other locations as appropriate.

b. A complete copy of the CAPER will be made available to the public on the City of Largo's website. Copies will also be made available at Largo City Hall and at the Largo Public Library- ~~unless~~ public facilities are closed to the public due to a disaster declaration.

~~b.~~

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MEETINGS

The City of Largo will provide reasonable and timely notice of all meetings so that all interested parties may have a chance to attend.

AVAILABILITY TO THE PUBLIC

In order to ensure that all citizens affected by the Largo CDBG Program have access to the Citizen Participation Plan; Assessment of Fair Housing, including any revisions to the AFH; Consolidated Plan, including substantial amendments to said plan; Annual Action Plan, including the substantial amendments; and the Consolidated Annual Performance and Evaluation Report, these documents will be made available for public inspection at the following locations during regular business hours for each location and on the City's website:

Community Development Department

201 Highland Avenue
Largo, FL 33770
(727) 586-7489

Largo Public Library

120 Central Park Drive
Largo, FL 33771
586-6715

Website:

www.largo.com/housing

These documents will, upon request, be made available in formats that are reasonably accessible to persons with disabilities and for minority populations and persons with limited English proficiency.

Should the above public facilities be closed to the public due to a disaster declaration, notifications and copies of plans will at minimum be available on the City's website.

ACCESS TO RECORDS

All records and information relating to the Assessment to Fair Housing, Consolidated Plan and the use of funds under that plan will be available for public inspection for a period of not less than five (5) years. This information is available for viewing at the Community Development Department of the City of Largo at the address below during regular working hours, Monday through Friday, excluding City holidays and/or closures due to disaster declarations:

City of Largo
Community Development Department
201 Highland Avenue
Largo, FL 33770
Telephone: (727) 586-7489 ext. 7212
Email: housing@largo.com

All citizens of Largo are guaranteed access to public records pertaining to the operation and administration of these programs pursuant to the Florida Public Records Law Act, Chapter 119, Florida Statutes. A reasonable number of free copies of studies, plans and reports as part of the Citizen Participation Process will be made available. Other records requests will be processed in accordance with Chapter 119, Florida Statutes and the City of Largo's Public Records Request Policy.

COMPLAINTS

Written complaints from the public will receive full consideration. Anyone wishing to make a formal complaint concerning the documents or programs referenced herein may do so in writing by submitting it to:

Housing Division
Community Development Department
City of Largo
P.O. Box 296
Largo, FL 33779-0296

Email: housing@largo.com

A substantive written response will be issued within 15 days, where practicable, for each written complaint received. City staff will be available during regular business hours, to assist persons in addressing concerns. All complaints shall be logged and addressed by City staff.

TECHNICAL ASSISTANCE

- a. Technical assistance will be provided to groups representing low- and moderate-income citizens that request assistance. Technical assistance provided will be based on the their needs, which may include (but is not limited to) the following:
 - i. Staff attendance/presentations at committee/neighborhood meetings, including at meetings held within the CDBG Target Area;
 - ii. Application workshops for agencies planning to apply;
 - iii. One-on-one technical assistance by phone, email, or in person;
 - iv. Printed or electronic reference/guidance materials; and/or
 - v. Assistance in establishing neighborhood planning committees.

b. Non-English Speaking Persons and Persons with Special Needs

To address the special needs of the non-English speaking population, the City will provide, when reasonably possible, translation assistance to non-English speaking persons attending Community Development Advisory Board (CDAB) meetings or other public meetings related to CDBG activities. Non-English speaking persons requesting translation services must give at least two days' notice prior to the meeting to the City Clerk's Office at (727) 587-6710. Furthermore, if other disadvantaged persons require special accommodations to participate in the CDBG process, the City will make every effort to ensure full and equal participation by such individuals. Residents with a hearing impairment may contact the City's TDD Line at (727) 587-6778 at least two days' prior to the meeting to request reasonable accommodations.

Upon request, reasonable accommodations will be made to provide documents in formats to persons with disabilities (ex. oral, electronic, large print copies, and/or delivering copies to persons that are homebound).

USE OF THE PLAN

The City of Largo will utilize this Citizen Participation throughout the development of the Citizen Participation Plan, and any amendments to the Citizen Participation Plan; Assessment of Fair Housing, and any revisions to the AFH; Consolidated Plan, and any substantial amendments to the Consolidated Plan; Annual Action Plan, and any substantial amendments; and the Consolidated Annual Performance Report.

DISPLACEMENT POLICY

If the City of Largo's use of federal grant dollars result in the displacement of residents, the City will implement its anti-displacement relocation policy and make all plans available for public comment. Such plans resulting in displacement of City residents shall include a plan for compensation of persons actually displaced as a result of the use of these funds, specifying the type and amount of compensation. The City of Largo ensures adherence to Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 to provide for the protection of displaced low- and moderate-income households.

DEFINITIONS

Annual Action Plan: A document submitted to HUD annually that describes the activities the City will undertake during the next year to address priority needs in terms of local objectives identified within the strategic plan. The Action Plan also includes a list of alternate projects to be pursued in the event that additional funding is available either through a substantial uncontrollable delay/cancellation of a primary project, or the unexpected receipt of additional program income or grant funds. The Annual Action Plan serves as the application for the Community Planning and Development formula grant programs (CDBG, ESG, HOME or HOPWA).

Applicant/Grantee: The government body which applies for funding under the HUD, and is responsible for complying with all regulations governing the program. In the City of Largo, the applicant is the City Commission. The applicant becomes the Grantee when funding is received.

Annual Application: The document submitted annually to HUD requesting funding under the CDBG Program. The application is submitted with the Action Plan.

Assessment of Fair Housing (AFH): A document submitted to HUD every five years that identifies fair housing issues and contributing factors, and results in prioritizing the City's fair housing objectives and strategies for affirmatively furthering fair housing.

Community Development Block Grant (CDBG): A federally funded grant program established for the purpose of developing viable communities, including decent housing, a suitable living environment, and economic opportunity for persons of low- and moderate-income. The grant also provides funds for the elimination of slums and blight.

Consolidated Plan: The Consolidated Plan is the long-range planning document that is part of the application requirements for the Community Development Block Grant (CDBG) and HOME Investment Partnership (HOME) programs. The plan is submitted every five (5) years and summarizes a community's priority needs and comprehensive strategies intended to meet those needs. Citizen and external institutional input is crucial to the development of the plan.

Consolidated Annual Performance and Evaluation Report (CAPER): The CAPER is prepared on an annual basis and documents progress made on achievement of strategies as outlined within the Consolidated Plan.

Formula Grant Funds: Federal grant programs under which the City of Largo receives funding as an entitlement directly from HUD (CDBG) or indirectly through the Pinellas County Consortium (HOME).

HOME Investment Partnership Program (HOME): A Federally-funded grant program established for the purpose of expanding the supply of decent, safe affordable housing for persons of low- and moderate-income and expanding the capacity of Community Housing Development Organizations to increase housing opportunities.

Participating Jurisdictions (PJs): States and local governments that are entitled to receive federal formula grant funds. This includes consortia that are designated by HUD to directly administer the HOME Program.

HUD-Defined Income Levels:

Extremely Low-Income Household: A household with an income less than 30% of the Tampa-St. Petersburg (Standard Metropolitan Statistical Area) SMSA.

Very Low-Income Household: A household with an income less than 50% of the Tampa-St. Petersburg (Standard Metropolitan Statistical Area) SMSA.

Moderate Income Household: A household with an income between 50-80% of the Tampa-St. Petersburg (Standard Metropolitan Statistical Area) SMSA.

Predominantly Low- and Moderate-Income Neighborhood: A block group, census tract or other clearly defined area that at least 51% of the residents in the neighborhood are low/moderate income.

Program Implementation: The process by which community development activities are set forth in the Action Plan and are carried out over the course of a fiscal year.

Program Assessment: The process through which annual community development and housing objectives are reviewed for progress achieved.

Project Application: The application for non-profit agencies who seek CDBG funding. The CDBG application period typically runs in fall/winter of the current year for the following year's funding.

Special Groups: Groups currently presumed by HUD to meet the low- and moderate-income criteria without requiring further income documentation. They include: abused children, elderly persons (62+), battered spouses, homeless persons, severely disabled persons, illiterate persons, and persons living with HIV/AIDS. Other special groups may also be designed in the Consolidated Plan.

Strategic Plan: A component of the Consolidated Plan that details how the priority needs indicated in the Consolidated Plan will be addressed.

Subrecipient: A public or private non-profit agency or organization receiving CDBG funds from a grantee or another subrecipient to undertake eligible activities.

Target Area: The City of Largo's CDBG Target Area has historically been the focus of federal assistance efforts since it is part of the City's original town center, and a significant number of the housing units are older and show signs of deterioration. All census tracts and/or block groups included in the CDBG Target Area have a low/moderate income household concentration greater than 51 percent. The boundaries of the Clearwater-Largo Road and the West Bay Drive Corridor, which have been designated a slum and blight area, generally fall within the Target Area. The area is located in the northwest section of the City, and covers approximately one square mile. Housing programs, such as rehabilitation loans and first time homebuyers assistance, while available citywide, are focused within the Target Area to maximize neighborhood stabilization and promote community reinvestment in the area.

U.S. Department of Housing and Urban Development (HUD): The federal department that administers the CDBG and HOME Programs.

Urban Counties: Those counties within a metropolitan area that have a population of at least 200,000 persons in their unincorporated areas, and counties with less than 200,000 persons in their unincorporated areas, but which have entered into cooperation agreements with cities whose populations are sufficient to bring the combined city and county populations to at least 200,000 persons. Pinellas County qualifies as an Urban County under both definitions, and as such, is entitled to apply for HOME funding.