# City of Corpus Christi, TX Amended Citizen Participation Plan

## PUBLIC DISPLAY AND COMMENT VERSION

## AMENDED CITIZEN PARTICIPATION PLAN

## RELATING TO THE ADMINISTRATION OF THE COMMUNITY PLANNING & DEVELOPMENT PROGRAMS OF THE U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT (HUD)

Public Comment Period from June 20, 2023 to July 20, 2023

## **Table of Contents**

## Contents

A. In	tro	duction	. 5
1.		Purpose	. 5
2.		Lead Agency and Contact Person	. 5
3.		Effective Date	. 5
B. En	со	uragement of Citizen Participation	. 5
1.		General	. 5
2.		Non-English Speakers	. 6
3.		Persons with Disabilities	. 6
4.		Low- and Moderate-Income Persons	. 6
5.		Organizations and Agencies	. 6
6.		Local Public Housing Authority	. 6
7.		Public Notices	. 6
8.		Public Meetings	. 7
9.		Technical Assistance	. 7
10		Online Access	. 7
11	•	Other Engagement Techniques	. 7
12		City Contact Person	. 7
C. Th	e (	Citizen Participation Plan	. 7
1.		Citizen Participation Plan Development	. 7
	a.	Public Review of the Draft CPP	. 7
	b.	Comments Received on Draft Amended CPP	. 8
	c.	Public Meeting	. 8
	d.	City Council Action	. 8
	e.	Submission to HUD	. 8
2.		Amendments to the Approved Citizen Participation Plan	. 8
	a.	Amendment Considerations	. 8
	b.	Draft Amended CPP Review	. 8
	c.	Comments Received on Draft Amended CPP	. 8
	d.	Public Meeting	. 9
	e.	City Council Action	. 9
	f.	Submission to HUD	. 9
	g.	Plan Access	. 9

	h.	In the Event of an Emergency	9
D. T	he C	Consolidated Plan (ConPlan)	9
1	. (	ConPlan Development	9
	a.	ConPlan Stakeholder Consultation and Citizen Outreach	9
	b.	ConPlan Public Meetings	. 10
	c.	ConPlan Potential Displacement of Persons	. 10
d.		ConPlan Public Display and Comment Period	. 11
	e.	Draft ConPlan Comments Received	. 11
	f.	City Council Action on ConPlan	. 11
	g.	Submission to HUD	. 11
2	. I	Revisions to the ConPlan	. 11
	a.	Revision Considerations	. 11
	b.	ConPlan Public Display and Comment Period	. 12
	c.	Public Meeting	. 12
	d.	Comments Received on the Draft Revised Consolidated Plan	. 12
	e.	City Council Action	. 12
	f.	Submission to HUD	. 13
3	. I	In the Event of a Disaster or Emergency	. 13
	a.	Public Review	. 13
	b.	Plan Access	. 13
E. T	ne A	Annual Action Plan (AAP)	. 13
1	. I	Plan Development	. 13
	a.	Public Meetings	. 14
	b.	Public Display and Comment Period	. 14
	c.	Comments Received on the Draft Annual Action Plan	. 14
	d.	City Council Action	. 14
	e.	Submission to HUD	. 15
2	. I	Revisions to the AAP	. 15
	a.	Revision Considerations	. 15
	b.	Public Display and Comment Period	. 15
	c.	Public Meeting	. 16
	d.	Comments Received on the Draft Revised AAP	. 16
	e.	City Council Action	. 16
	f.	Submission to HUD	. 16
3	. 1	In the Event of a Disaster or Emergency	. 16

а	. Plar	n Access 1	6
F. Con	solidate	ed Annual Performance and Evaluation Report (CAPER)1	7
1.	Report	t Development1	7
а	. Rep	port Considerations1	7
b	. Pub	blic Display and Comment Period1	7
с	. Con	nments Received on the Draft CAPER1	7
d	. Sub	pmission to HUD1	7
е	. Plar	n Access 1	7
G. Sec	tion 108	8 Loan Guarantee Program1	8
а	. Dev	velopment of Section 108 Loan Guarantee Application1	8
b	. Pub	blic Display and Comment Period1	8
с	. Con	nments Received on the Proposed Section 108 Application1	8
d	. Sub	pmission to HUD1	8
2.	Compl	laints1	8

## CITIZEN PARTICIPATION PLAN

## A. Introduction

#### 1. Purpose

Pursuant to the citizen participation requirements of 24 CFR Section 91.105 and 24 CFR Part 5, the City of Corpus Christi, TX (referred to as the "City") sets forth the following amended Citizen Participation Plan (the "Plan") as it relates to the administration of the Community Planning and Development (CPD) programs funded by the U.S. Department of Housing and Urban Development (HUD). The 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 following plans and programs:

- The Citizen Participation Plan (CPP)
- The Consolidated Plan (ConPlan)
- The Annual Action Plan (AAP)
- Analysis of Impediments to Fair Housing Choice (AI)
- The Consolidated Annual Performance and Evaluation Report (CAPER)
- The Section 108 Loan Guarantee Program (Section 108)

#### 2. Lead Agency and Contact Person

The Planning and Community Development Department of the City is the lead agency responsible for the administration of the Community Development Block Grant (CDBG) Program, HOME Investment Partnerships Program (HOME) and Emergency Solution Grant Program (ESG). All communication regarding the documents covered by this Plan, comments, complaints, reasonable accommodation for disabled persons, translation services, or other elements shall be directed to:

Director of Planning and Community Development Planning and Community Development Department City of Corpus Christi 1201 Leopard Street, Corpus Christi, TX 78401 Phone: 316.826.3010

#### 3. Effective Date

Subsequent to approval of the CPP by City Council and HUD, this Plan shall be effective until it is amended or otherwise replaced.

## **B. Encouragement of Citizen Participation**

#### 1. General

The City provides for and encourages citizens to participate in the development, revision, amendment, adoption and implementation of the CPP, the ConPlan, the AAP, the AI, the CAPER, Section 108. The City encourages participation by low- and moderate-income persons, particularly those living in areas designated as revitalization areas or in slum and blighted areas and in areas where HUD funds are proposed to be used, and by residents of predominantly low- and moderate- income neighborhoods. With respect to the public participation initiatives included in this Plan, the City will take appropriate

actions to encourage the participation of all of its citizens, including minorities, non-English speaking persons, and persons with disabilities, as described below.

#### 2. Non-English Speakers

The City has determined that, based on 2021 American Community Survey data, 4.0% percent of residents speak English less than very well. Upon request, materials may be provided in Spanish language.

#### 3. Persons with Disabilities

To encourage the participation of persons with disabilities, the City will include the following language in all public meeting notices published in the Caller Times:

If you need accommodations for physical mobility, sensory impairment or language needs to participate in the meeting, please contact the Planning and Community Development Department at (316) 826-3010. Notification 48 hours prior to the meeting will enable the Planning and Community Development Department to make reasonable arrangements to ensure accessibility to the meeting.

The City will conduct all public meetings in locations that are handicapped-accessible, when available.

#### 4. Low- and Moderate-Income Persons

The City will conduct at least one public meeting in a neighborhood that contains at least 51% low- and moderate-income residents, based on current HUD data, during the development of the ConPlan and the AAP.

#### 5. Organizations and Agencies

The City encourages the participation of local and regional institutions, the Continuum of Care, businesses, developers, nonprofit organizations, philanthropic organizations, and community-based and faith-based organizations in the process of developing, revising, amending, adopting and implementing all documents covered by the CPP. This will be achieved through stakeholder interviews, focus groups and/or public meetings.

#### 6. Local Public Housing Authority

The City, in consultation with the Corpus Christi Housing Authority (CCHA), encourages the participation of residents of any public housing developments located within the City in the process of developing, revising, amending, adopting and implementing the documents covered by this Plan. The City will provide information to the Executive Director of CCHA about the ConPlan and subsequent AAP activities related to the public housing developments and communities so that CCHA can make this information available at the annual public meetings required for its Public Housing Authority Agency Plan.

#### 7. Public Notices

Public review/comment periods and public meetings held in the process of developing, revising, amending, adopting and implementing the documents covered by the CPP shall be advertised in the Caller Times no less than 10 days prior to when the public meeting is held.

#### 8. Public Meetings

All public meetings will be scheduled at times and locations, either in-person and or virtually, that are convenient for potential and actual program beneficiaries, and with accommodation for persons with disabilities and non-English speakers in accordance with the CPP.

#### 9. Technical Assistance

The City's Planning and Community Development Department staff are available to assist organizations and other eligible individuals that are interested in submitting a proposal to obtain funding through the CDBG, HOME or ESG programs. All potential applicants are strongly encouraged to contact the Planning and Community Development Department for technical assistance before initiating a funding request application. The Planning and Community Development Department Department contact information can be obtained at: <a href="https://www.cctexas.com/gmd">https://www.cctexas.com/gmd</a>.

#### **10.Online Access**

The City will post draft copies and final copies of all documents covered by the CPP on its website: <u>https://www.cctexas.com/gmd.</u>

#### **11.Other Engagement Techniques**

The City's Planning and Community Development Department may, as needed, hold virtual ConPlan and AAP community and stakeholder engagement meetings and or events in order to potentially engage those residents who might not be able to attend such meetings in-person. The CPP may be amended as the City continues to gain access to technology that improves the avenues of participation by its residents.

#### **12.City Contact Person**

All communication regarding the CPP, ConPlan, AAP, AI, CAPER, project environmental reviews, or public comments or complaints, reasonable accommodation for disabled persons, translation services, or other elements of HUD entitlement programs and activities shall be directed to: the Grant Monitoring Program Manager, City of Corpus Christi

1201 Leopard Street, Corpus Christi, TX 78401.

## C. The Citizen Participation Plan

#### 1. Citizen Participation Plan Development

The City's public review procedure when developing its Citizen Participation Plan (CPP) is as follows:

#### a. Public Review of the Draft CPP

The draft CPP will be made available for public review for a 15-day period prior to City Council consideration and adoption and may be done concurrently with the public review and comment process for the ConPlan. Copies of the draft CPP will be made available for review at the following locations:

- The City's Planning and Community Development Department, 1201 Leopard Street, Corpus Christi, TX 78401.
- The City's website at: <a href="https://www.cctexas.com/gmd">https://www.cctexas.com/gmd</a>
- La Retama Library, 805 Comanche Street, Corpus Christi, TX 78401

#### b. Comments Received on Draft Amended CPP

Written comments will be accepted by the City's Director of Planning and Community Development, or a designee, during the 15-day public review period.

#### c. Public Meeting

The City will conduct a public meeting to review and accept public comments on the draft Amended CPP prior to its approval and submittal to HUD. This public meeting may be held concurrently with the public meeting held in conjunction with the Consolidated Plan.

#### d. City Council Action

Following the public meeting, the Plan will be presented to City Council for consideration and formal action.

#### e. Submission to HUD

A copy of the CPP, including a summary of all written comments and those received during the public meeting as well as the City's responses and proof of compliance with the minimum 15-day public review and comment period requirement, will be submitted to HUD. A summary of any comments or views not accepted and the reasons therefore shall be supplied to HUD as well.

#### 2. Amendments to the Approved Citizen Participation Plan

The City shall follow the following procedure to amend its approved (CPP), as needed.

#### a. Amendment Considerations

The City will amend the CPP, as necessary, to ensure adequate engagement and involvement of the public in making decisions related to its federal funding programs. Substantial amendments to the CPP may be required should a provision of the CPP be found by the City to conflict with HUD regulations, or when changes in HUD regulations occur, or based on current HUD guidance. Edits to the CPP that only include updated contact information or editorial changes for clarity will not be released for public review and comment.

#### b. Draft Amended CPP Review

The draft amended CPP will be made available for public review for a <u>15-day</u> period prior to City Council consideration and adoption and may be done concurrently with the public review and comment process for the ConPlan or a AAP. Copies of the draft and final Amended CPP will be made available for review at the following locations:

- The City's Planning and Community Development Department, 1201 Leopard Street, Corpus Christi, TX 78401.
- The City's website at: <a href="https://www.cctexas.com/gmd">https://www.cctexas.com/gmd</a>
- La Retama Library, 805 Comanche Street, Corpus Christi, TX 78401

#### c. Comments Received on Draft Amended CPP

Written comments will be accepted by the Director of Community Development Department, or a designee, during the <u>15-day</u> public review period.

#### d. Public Meeting

The City will conduct a public meeting to review and accept public comments on the draft Amended CPP prior to its approval and submittal to HUD. This public meeting may be held concurrently with the public meeting held in conjunction with the ConPlan or a AAP.

#### e. City Council Action

Following the public meeting, the CPP will be presented to City Council for consideration and formal action.

#### f. Submission to HUD

A copy of the Amended CPP, including a summary of all written comments and those received during the public meeting as well as the City's responses and proof of compliance with the minimum 15-day public review and comment period requirement, will be submitted to HUD. A summary of any comments or views not accepted and the reasons therefore shall be supplied to HUD as well.

#### g. Plan Access

The approved CPP and any amendments will be kept on file in the City of Corpus Christi, 1201 Leopard Street, Corpus Christi, TX 78401, attention: Planning and Community Development Department. The Plan can be accessed online at: <u>https://www.cctexas.com/gmd</u>. Hard copies can be made available to those requesting the CPP by contacting the City's Director of Planning and Community Development, or a designee.

#### h. In the Event of an Emergency

In the event of a local, state or federally declared disaster or emergency or pandemic where public places may be closed to the public or in-person participation may not be feasible or large gatherings may be considered a public health risk, the City may opt to forgo the public meeting for amendments to its CPP. The length of public comment for amendments to the CPP shall be no less than five (5) days. Draft documents for public comment and review will be made available on the City's website at: <u>https://www.cctexas.com/gmd</u>. Copies of the draft documents will be mailed or e-mailed upon request, if possible.

## D. The Consolidated Plan (ConPlan)

#### 1. ConPlan Development

The City will follow the process and procedures described below in the development of its ConPlan.

#### a. ConPlan Stakeholder Consultation and Citizen Outreach

In the development of the ConPlan, the City will consult with other public and private agencies including, but not limited to, the following:

- The Corpus Christi Housing Authority
- Other assisted housing providers
- Social service providers including those focusing on services to minorities, people with low-and moderate household income, families with children, the elderly, persons with disabilities, persons with HIV/AIDS and their families, homeless persons, and other protected classes
- Continuum(s) of Care that serve(s) the jurisdiction
- Community-based and regionally based organizations that represent protected class members

and organizations that enforce fair housing laws

- Regional government agencies involved in metropolitan-wide planning and transportation responsibilities
- Business and civic leaders
- Broadband internet service providers and organizations engaged in narrowing the digital divide
- Agencies whose primary responsibilities include the management of flood prone areas, public land or water resources
- Emergency management agencies.

When preparing the portion of the ConPlan concerning lead-based paint hazards, the City shall consult with local or state health and child welfare agencies and examine existing data related to lead-based paint hazards and poisonings, including health department data on the addresses of housing units in which children have been identified as lead-poisoned.

When preparing the description of priority non-housing community development needs, the City will notify adjacent units of local government, to the extent practicable. This shall involve, at a minimum, the City sending a letter to the chief elected official of each adjacent unit of government notifying them of the draft ConPlan and how to access a copy online for review and comment.

A variety of mechanisms may be utilized to solicit input from these persons/service providers /agencies/ entities. These include written letters, telephone or in-person interviews, surveys, internet-based feedback and surveys, focus groups, and/or consultation workshops.

#### b. ConPlan Public Meetings

The City will conduct at least two public meetings in the development of the ConPlan. The first public meeting will be conducted before the draft ConPlan is published for public comment, during which the City will address housing and community development needs, development of proposed activities, the amount of assistance the City expects to receive (including grant funds and program income), the range of activities that may be undertaken, including the estimated amount that will benefit low- and moderate-income residents, and a review of program performance.

The second public meeting will be conducted during or after the <u>30-day</u> public comment period during which the City will address identified housing and community development needs and proposed eligible activities.

The City shall provide meeting notices to local nonprofit agencies, subrecipients, CCHA, and other interested groups and residents (see Section D.1.a above).

#### c. ConPlan Potential Displacement of Persons

Although the City does not anticipate any residential displacement to occur in the foreseeable future, it is required to describe its plans to minimize the displacement of persons and to assist any persons displaced. When displacement is unavoidable on a temporary or permanent basis, the City will comply with the federal Uniform Relocation Act.

Should displacement of residents be necessary as a result of the use of funds covered by this CPP, the City shall compensate residents who are actually displaced in accordance with *HUD Handbook No.* 1378, Tenant Assistance, Relocation and Real Property Acquisition.

This resource is accessible online at: <u>https://www.hud.gov/program\_offices/administration/hudclips/handbooks/cpd/13780</u>

#### d. ConPlan Public Display and Comment Period

The draft ConPlan will be placed on display for a period of no less than <u>30 days</u> to encourage public review and comment. The public notice shall include a brief summary and purpose of the ConPlan; the anticipated amounts of funding (including program income, if any); proposed activities likely to result in displacement, if any; plans for minimizing the displacement of persons as a result of CDBG activities, if any; plans to assist persons actually displaced by the project, if any; the dates of the public display and comment period; the locations where copies of the draft ConPlan can be examined; how comments will be accepted; when the document will be considered for action by City Council; and, the anticipated submission date to HUD. Copies of the draft ConPlan will be made available for review at the following locations:

- The City's Planning and Community Development Department, 1201 Leopard Street, Corpus Christi, TX 78401.
- The City's website at: <u>https://www.cctexas.com/gmd</u>
- La Retama Library, 805 Comanche Street, Corpus Christi TX 78401

#### e. Draft ConPlan Comments Received

Written comments will be accepted by the Director of the City's Planning and Community Development Department, or a designee, during the 30-day public display and comment period. The City will consider any comments or views of City residents received in writing, or orally at the public meeting, in preparing the final ConPlan. 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 ConPlan for submission to HUD.

#### f. City Council Action on ConPlan

Following the public meeting, the ConPlan will be presented to City Council for consideration and formal action.

#### g. Submission to HUD

The ConPlan will be submitted to HUD no less than 45 days before the start of the City's five-year program cycle.

#### 2. Revisions to the ConPlan

The City shall follow the following procedure to revise its ConPlan, as needed.

#### a. Revision Considerations

There are two types of amendments that may occur with the ConPlan: minor amendments and substantial amendments.

- 1) Minor Amendment
  - When funds are added to an approved eligible activity that do not exceed \$25,000
  - When the scope of an approved eligible activity has changed, however the service area, site, accomplishments and or beneficiaries does not change.
- 2) <u>Substantial Amendment:</u>

An amendment to the approved ConPlan is considered substantial under the following circumstances:

- When a new eligible activity is added
- When an approved activity is deleted
- When there is a change in the priorities identified in the ConPlan
- When funds are added to an approved eligible activity that exceed \$500,000 in CDBG and/or HOME program or \$100,000 of the ESG programs

All other changes that do not meet the criteria defined above will be considered minor amendments and can be reviewed and approved by the Director, Planning and Community Development Department and will not be subject to public comments and or a public comment period. These changes will be fully documented and signed-off by the Director, Planning and Community Development Department.

The City may choose to submit a copy of each amendment to the ConPlan to HUD as it occurs, or at the end of the program year. Letters transmitting copies of amendments will be signed by the Director, Planning and Community Development Department.

#### b. ConPlan Public Display and Comment Period

The draft revised ConPlan will be placed on display for a period of no less than <u>30 days</u> to encourage public review and comment. The public notice shall include a brief summary of the revisions, the dates of the public display and comment period, the locations where copies of the proposed revised ConPlan can be examined, how comments will be accepted, when the document will be considered for action by City Council, and the anticipated submission date to HUD. Copies of the draft revised ConPlan will be made available for review at the following locations:

- The City's Planning and Community Development Department, 1201 Leopard Street, Corpus Christi, TX 78401.
- The City's website at: <a href="https://www.cctexas.com/gmd">https://www.cctexas.com/gmd</a>
- La Retama Library, 805 Comanche Street, Corpus Christi, TX 78401

#### c. Public Meeting

The City will conduct a public meeting to review and accept public comments on the draft Amended ConPlan prior to its approval and submittal to HUD. This public meeting may be held concurrently with the public meeting held in conjunction with the Consolidated Plan and the Annual Action Plan.

#### d. Comments Received on the Draft Revised Consolidated Plan

Written comments will be accepted by the City's Director of Planning and Community Development, or a designee, during the 30-day public display and comment period. The City will consider any comments or views of City residents received in writing, or orally at public meetings, in preparing the final Revised ConPlan. 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 Revised ConPlan for submission to HUD.

#### e. City Council Action

Following the public meeting, the revised ConPlan will be presented to City Council for consideration and formal action.

#### f. Submission to HUD

The revised ConPlan/Amendment will be submitted to HUD following the end of the public display and comment period and adoption by City Council.

#### 3. In the Event of a Disaster or Emergency

In the event of a local, state or federally declared disaster or emergency where public places may be closed to the public or in-person participation may not be feasible or large gatherings may be considered a public health risk, the City may opt to conduct public meetings and meetings virtually via conference call or live web-streaming with the ability to provide comment and ask questions and receive a response in a timely manner. Accommodations will be made for persons with disabilities and non-English speaking persons upon request. Documents for public review will be shared via the City's website. This provision shall apply to all documents covered by this CPP.

#### a. Public Review

In the event of an emergency, the following alternatives may be instituted by the City:

- The length of the public comment and display period for the ConPlan or AAP and Substantial Amendments shall be no less than five (5) days.
- Draft documents for public comment and review will be made available on the City's website at: <a href="https://www.cctexas.com/gmd">https://www.cctexas.com/gmd</a>. Copies of the draft documents will be mailed or e-mailed upon request, if possible.
- Public meetings may be held as virtual meetings using local cable access television or other online
  platforms for public viewing with the option to provide comment and questions ahead of time or
  during the meeting, and responses will be provided in a timely manner.
- The City may opt to hold one public meeting during the ConPlan/AAP process and its second required public meeting during the CAPER process for the same program year.

#### b. Plan Access

The revised ConPlan will be kept on file at the Department of Planning and Community Development, City of Corpus Christi website: <u>https://www.cctexas.com/gmd</u>

Hard copies can be made available to those requesting the Plan by contacting the City's Director of Planning and Community Development, or a designee.

## E. The Annual Action Plan (AAP)

The Annual Action Plan (AAP) is a component of the ConPlan, and it describes the City's proposed use of available federal and other resources to address the priority needs and specific objectives in the ConPlan for each program year; the City's method for distributing funds to local non-profit organizations; and, the geographic areas of the City to which it will direct assistance.

#### 1. Plan Development

The City will follow the process and procedures described below in the development of its AAP.

#### a. Public Meetings

The City will conduct at least two public meetings during the development of the AAP. The first public meeting will be conducted before the AAP draft is published for public comment. During the first public meeting, the City will address housing and community development needs, development of proposed activities, the amount of assistance the City expects to receive (including grant funds and program income), the range of activities that may be undertaken, including the estimated amount that will benefit low- and moderate-income residents, and a review of program performance.

The second public meeting 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 eligible activities, and proposed strategies and actions for affirmatively furthering fair housing, consistent with the Analysis of Impediments to Fair Housing.

Both public meetings conducted for the Year 1 AAP may be conducted concurrently with the required public meetings for the five-year ConPlan.

#### b. Public Display and Comment Period

The draft AAP will be placed on display for a period of no less than 30 days to encourage public review and comment. The public notice shall include a brief summary of the AAP, the anticipated amounts of funding (including program income, if any), the dates of the public display and comment period, the locations where copies of the draft AAP can be examined, how comments will be accepted, when the document will be considered for action by City Council, and the anticipated submission date to HUD. Copies of the draft AAP will be made available for review at the following locations:

- The City's Planning and Community Development Department, 1201 Leopard Street, Corpus Christi, TX 78401.
- The City's website at: <a href="https://www.cctexas.com/gmd">https://www.cctexas.com/gmd</a>
- La Retama Library, 805 Comanche, Corpus Christi TX 78401

#### c. Comments Received on the Draft Annual Action Plan

Written comments will be accepted by the City's Director of Planning and Community Development, or a designee, during the 30-day public display and comment period. The City will consider any comments or views of City residents received in writing or orally at the public meetings in preparing the final AAP. 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 AAP for submission to HUD.

#### d. City Council Action

Following the public meeting, the AAP will be presented to City Council for consideration and formal action.

#### e. Submission to HUD

The AAP will be submitted to HUD no less than 45 days before the start of the City's annual program year.

#### 2. Revisions to the AAP

The City shall follow the following procedure to revise its AAP, as needed.

#### a. Revision Considerations

There are two types of amendments that may occur with the AAP: minor amendments and substantial amendments. An amendment to the approved AAP is considered substantial under the following circumstances:

- When an eligible activity is added or deleted
- When a change occurs in the purpose, location, or beneficiaries of an activity previously approved
- When a 50 percent change in federal funding occurs where the project is \$25,000 or less
- When a 25 percent change in federal funding occurs where the project is more than \$25,000.

All other changes to funding allocations or approved eligible activities that do not meet the criteria defined above will be considered minor amendments, will be reviewed and approved by the City's Planning and Community Development Department and will not be subject to public comments. These changes will be fully documented and signed by the Director of Planning and Community Development.

The City may choose to submit a copy of each substantial amendment to the AAP to HUD as it occurs, or at the end of the program year. Letters transmitting copies of amendments will be signed by the Director of Planning and Community Development.

#### b. Public Display and Comment Period

The draft Revised AAP will be placed on display for a period of no less than 30 days to encourage public review and comment. The public notice shall include a brief summary of the revisions, the dates of the public display and comment period, the locations where copies of the draft AAP can be examined, how comments will be accepted, when the document will be considered for action by City Council, and the anticipated submission date to HUD. Copies of the draft Revised AAP will be made available for review at the following locations:

- The City's Planning and Community Development Department, 1201 Leopard Street, Corpus Christi, TX 78401.
- The City's website at: <a href="https://www.cctexas.com/gmd">https://www.cctexas.com/gmd</a>
- La Retama Library, 805 Comanche Street, Corpus Christi TX 78401

#### c. Public Meeting

The City will conduct a public meeting to review and accept public comments on the draft Amended Plan prior to its approval and submittal to HUD. This public meeting may be held concurrently with the public meeting held in conjunction with the ConPlan.

#### d. Comments Received on the Draft Revised AAP

Written comments will be accepted by the City Contact Person, or a designee, during the 30-day public display and comment period. The City will consider any comments or views of City residents received in writing, or orally at public meetings, in preparing the final Revised AAP. 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 Revised AAP for submission to HUD.

#### e. City Council Action

Following the public meeting, the Revised AAP will be presented to City Council for consideration and formal action.

#### f. Submission to HUD

The Revised AAP will be submitted to HUD following the end of the public display and comment period.

#### 3. In the Event of a Disaster or Emergency

In the event of a local, state or federally declared disaster or emergency where public places may be closed to the public or in-person participation may not be feasible or large gatherings may be considered a public health risk, the City may opt to conduct public meetings and meetings virtually via conference call or live webstreaming with the ability to ask questions and provide comment in real time where public comment is required to be heard. Accommodations will be made for persons with disabilities and non-English speaking persons upon request. Documents for public review will be shared via the City's website. This provision shall apply to all documents covered by this Plan.

- The length of the public comment and display period for the Consolidated Plan or Annual Action Plan and Substantial Amendments shall be no less than five (5) days.
- Draft documents for public comment and review will be made available on the City's website at: <u>https://www.cctexas.com/gmd</u>
- Copies of the draft documents will be mailed or e-mailed upon request, if possible.
- Public meetings may be held as virtual meetings using local cable access television or other online platforms for public viewing with the option to provide comment and questions ahead of time or during the meeting, and responses will be provided in a timely manner.
- The City may opt to hold one public meeting during the ConPlan/AAP process and its second required public meeting during the CAPER process for the same program year.

#### a. Plan Access

The Revised AAP will be kept on file in the City of Corpus Christi, 1201 Leopard Street, Corpus Christi, TX 78401, attention: Planning and Community Development Department. The Plan can be accessed online at: <a href="https://www.cctexas.com/gmd">https://www.cctexas.com/gmd</a>.

Hard copies can be made available to those requesting the Plan by contacting the City's Director of Planning and Community Development, or a designee.

# F. Consolidated Annual Performance and Evaluation Report (CAPER)

#### **1. Report Development**

The City shall follow the following procedure in the drafting and adoption of its Consolidated Annual Performance and Evaluation Report (CAPER).

#### a. Report Considerations

The Planning and Community Development Department will evaluate and report the accomplishments and expenditures of the previous program year for CDBG, HOME, and ESG funds and draft the CAPER in accordance with HUD requirements.

#### b. Public Display and Comment Period

The draft CAPER will be placed on display for a period of no less than 15 days to encourage public review and comment. Public notice of the display and comment period will be published in the Caller Times no less than 10 days before the comment period begins with accommodation for persons with disabilities and non-English Spanish speakers in accordance with this CPP. The public notice shall include a brief summary and purpose of the CAPER, a summary of program expenditures, a summary of program performance, the dates of the public display and comment period, the locations where copies of the draft CAPER can be examined, how comments will be accepted, and the anticipated submission date to HUD. Copies of the draft CAPER will be made available for review at the following locations:

- The City's Planning and Community Development Department, 1201 Leopard Street, Corpus Christi, TX 78401.
- The City's website at: <a href="https://www.cctexas.com/gmd">https://www.cctexas.com/gmd</a>
- La Retama Library, 805 Comanche Street, Corpus Christi TX 78401

#### c. Comments Received on the Draft CAPER

Written comments will be accepted by the City's Director of Planning and Community Development, or a designee, during the 15-day public display and comment period. The City will consider any comments or views of City residents received in writing in preparing the final CAPER. 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 CAPER for submission to HUD.

#### d. Submission to HUD

The CAPER will be submitted to HUD within 90 days following the last day of the City's annual program year.

#### e. Plan Access

The CAPER will be kept on file in the City of Corpus Christi, 1201 Leopard Street, Corpus Christi, TX 78401, attention: Planning and Community Development Department. The Plan can be accessed online at: <u>https://www.cctexas.com/gmd</u>.

Hard copies can be made available to those requesting the Plan by contacting the City's Director of Planning and Community Development, or a designee.

### G. Section 108 Loan Guarantee Program

#### a. Development of Section 108 Loan Guarantee Application

Applications for assistance filed by the City for Section 108 Loan Guarantee assistance authorized under HUD regulation 24 CFR Part 570, Subpart M, are subject to all provisions set forth within this Plan. Such applications for Section 108 assistance may be included as part of the Consolidated Planning process or may be undertaken separately anytime during the City's program year.

Before the City submits an application for Section 108 loan guarantee assistance, the City will make available to citizens, public agencies and other interested parties information that includes the amount of assistance the City expects to be made available (including program income), the range of activities that may be undertaken, the estimated amount that will benefit persons of low- and moderate-income, and any activities likely to result in displacement.

#### b. Public Display and Comment Period

The City will publish its proposed Section 108 loan application for review and comment. The public notice shall include a summary describing the contents and purpose of the application and listing the locations where the entire application may be examined. An application for Section 108 Loan Guarantee funding shall be made available for public review for a 30-day period prior to consideration and submission to HUD and may be done concurrently with the public review and comment process for the Consolidated Plan.

Copies of the proposed Section 108 loan application will be made available for review at the following locations:

- The City's Planning and Community Development Department, 1201 Leopard Street, Corpus Christi, TX 78401.
- The City's website at: <u>https://www.cctexas.com/gmd</u>La Retama Library, 805 Comanche Street, Corpus Christi TX 78401

#### c. Comments Received on the Proposed Section 108 Application

Written comments will be accepted by the City's Director of Planning and Community Development, or a designee, during the 30-day public display and comment period. The City will consider any comments or views of City residents received in writing in preparing the final application. 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 application for submission to HUD.

#### d. Submission to HUD

The Section 108 Loan Application will be submitted to HUD.

#### 2. Complaints

Residents may register complaints regarding any aspect of the CDBG, HOME and ESG programs by contacting the City's Director of Planning and Community Development, or a designee. All written complaints received will be addressed in writing within 15 days.

Residents wishing to object to HUD approval of the final ConPlan, AAP or any other documents identified in this CPP may send written objections to the HUD Field Office at:

U.S. Dept of Housing & Urban Development San Antonio Field Office Hipolito Garcia Federal Building 615 East Houston Street, Suite 347 San Antonio, TX 78205-2001

Any written objections should be made within 30 days after the City has submitted any of the documents covered by this CPP to HUD. Any objections made will only be submitted to HUD for the following reasons:

The applicant's description of needs and objectives is 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. The application does not comply with the requirements of the CDBG, HOME or ESG programs or other applicable laws. The application's proposed activities which are otherwise ineligible under the program regulations.

Objections shall include both an identification of requirements not met and available facts and data.