

City of Galveston
Citizen Participation Plan
Version 2
October 28, 2022





City of Galveston CDBG-DR/MIT Citizen Participation Plan

Background

The Texas General Land Office (GLO) administers Community Development Block Grant Disaster Recovery (CDBG-DR) and Mitigation (CDBG-MIT) funds allocated to Texas by the U.S. Department of Housing and Urban Development (HUD). As part of the administration of CDBG-DR/MIT funds, the GLO is required comply with HUD's citizen participation requirements as outlined in HUD's applicable Federal Register (FR) notices. In order to receive CDBG-DR/MIT funding, subrecipients must also comply with these FR requirements as well as those specified in 24 CFR 570.486 and the GLO Program Guidelines.

CDBG-DR/MIT application submittal and project awards are contingent upon the City of Galveston's Application for Federal Assistance (SF-424) certifications and complete documentation that, at a minimum, a substantially complete application was:

- Publicly posted for at least a 14-day public comment period; and
- All comments received and responses are documented as part of the application.

Documentation of citizen participation efforts to be incorporated as part of the application includes, but is not limited to, the following:

- An affidavit of public posting with photos to support the posting;
- Screenshots of a website posting; and
- Newspaper publisher's affidavit and tear sheet.

As part of the application process, the City of Galveston will carry out citizen participation procedures in accordance with this plan and will certify compliance with these requirements by signing the Application for Federal Assistance (SF-424) form.





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Consistency with City CDBG Consolidated Plan

The City maintains a Consolidated Plan for the administration of CDBG funding. This Plan has been made consistent with the Consolidated Plan by providing for a 14-day publication period.

Definitions

Residents of Predominantly Low- and Moderate-income neighborhoods means residents of census tracts where 51 percent or more of the population has annual household incomes at or below 80 percent of the Area Median Income, adjusted for household size, as published in HUD's annual income tables.

Publication of Citizen Participation Plan

In compliance with 24 CFR 91.105(a)(3) this Citizen Participation Plan will be published for public comment. The public comment period shall be no less than 14 days.

City of Galveston Citizen Participation Plan (CDBG-DR/MIT Funding)

As part of the citizen participation process, the City will ensure that all citizens have equal access to information about project activities by ensuring documentation of the following:

- 1) Outreach Efforts: The City will provide reasonable public notice, appraisal, examination, and comment on the activities proposed for the use of CDBG-DR/MIT funds. These efforts shall:
 - a) Provide for and encourage citizen participation, particularly by low- and moderate-income persons, and areas in which CDBG-DR/MIT funds are proposed to be used;
 - b) Ensure that citizens will be given reasonable and timely access to local meetings, information, and records relating to an entity's proposed and actual use of CDBG-DR/MIT funds;





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- c) Furnish citizens information, including, but not limited to:
 - i. The amount of CDBG-DR/MIT funds expected to be made available;
 - ii. The range of activities that may be undertaken with CDBG-DR/MIT funds;
 - iii. The estimated amount of the CDBG-DR/MIT funds proposed to be used for activities that will meet the national objective of benefit to low- and moderate-income persons; and
 - iv. If applicable, the proposed CDBG-DR/MIT activities likely to result in displacement and the entity's anti-displacement and relocation plan;
- d) Provide citizens with reasonable advanced notice of, and opportunity to comment on, proposed activities in an application to GLO and, for grants already made, activities which are proposed to be added, deleted, or substantially changed from the City's application to the state. "Substantially changed" means changes made in terms of purpose, scope, location, or beneficiaries as defined by criteria established by GLO;
- e) These City's outreach efforts will be accomplished through one or more of the following methods:
 - i. Publication of notice in a local newspaper (a published newspaper article may also be used, so long as it provides sufficient information regarding program activities and relevant dates);
 - ii. Notices prominently posted in public buildings and distributed to





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local public housing authorities and other interested community groups;

- iii. Posting of notice on the local entity website (if available);
- iv. Public hearing; or
- v. Individual notices to interested citizen organizations, advisory groups, and other entities as applicable using one or more of the following methods:
 - Certified mail;
 - Electronic mail or fax;
 - First-Class (regular) mail; or
 - Personal delivery (e.g., at a council of governments meeting).

Along with the application certification and documentation, the City will retain any notices of public hearings that the City may have that relate to the application and administration of CDBG-DR/MIT funds. In addition, the City will undertake the following:

- 2) Adoption of CDBG-DR/MIT Complaint Procedures: These written citizen complaint procedures will provide a timely written response (within 15 working days) to complaints and grievances. Citizens will be made aware of the location and the days and hours when the location is open for business so they may obtain a copy of these written procedures.
- 3) Technical Assistance: When requested, the City shall provide technical assistance





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to groups representative of persons of low and moderate income in developing proposals for the use of CDBG-DR/MIT funds. The level and type of assistance shall be determined by the specific needs of the community's residents, agencies, and organizations.

- 4) Public Hearing Provisions: For each public hearing scheduled and conducted all public hearing provisions listed in 1 (c) listed above will be observed in addition to the following:
 - a) Public notices for any hearings will be published 14 days prior to the scheduled hearing. The public notice will be published in a local newspaper. Each public notice will include the DATE, TIME, LOCATION, and TOPICS to be considered at the public hearing. A published newspaper article may also be used to meet this requirement so long as it meets all content and timing requirements. Notices will also be prominently posted in public buildings and distributed to local public housing authorities and other interested community groups.
 - b) Each public hearing shall be held at a time and location convenient to potential or actual beneficiaries and will include accommodation for persons with disabilities. Persons with disabilities must be able to attend the hearings, and an applicant must make arrangements for individuals who require auxiliary aids or services if contacted at least two (2) days prior to each hearing.
 - c) When a significant number of non-English speaking residents can be reasonably expected to participate in a public hearing, an interpreter will be present to accommodate the needs of the non-English speaking residents.
 - d) The City may conduct a public hearing via webinar if a physical location with associated reasonable accommodations will be made available, to ensure that those individuals without the necessary technology are able to





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participate.

More specifically, the following actions will be undertaken to implement the citizen participation plan to encourage citizen participation at all stages of the City's CDBG-DR/MIT projects:

- 1) Subsequent to the posting and publication of CDBG-DR/MIT applications, the City will provide a reasonable opportunity of at least 14 days and have a method(s) for receiving comments for substantially complete applications. Substantially complete applications will include, at a minimum, a scope of work, budget, identification of all sources of funding, and maps to identify the project location and beneficiaries. Citizens with disabilities or those who need technical assistance can contact the City's office for assistance, either via calling (409) 797-3546 or through the Federal Information Relay Service (1-800-877-8339) for TTY/Voice Communication.

All CDBG-MIT public notices will be published in the Galveston Daily News, posted on the City's website, and may be posted and/or distributed on social media, at City hall, public works department, public library, community centers, and Public Housing Authority. In addition, hard copies of the substantially complete CDBG-DR/MIT applications, and free copies thereof, will be available at:

Galveston City Secretary Office
823 Rosenberg
Galveston, TX 77550

Upon request, the Galveston Community Outreach Department will make the applications and program related materials available in a form accessible to persons with disabilities.

- 2) Public comments will be collected via USPS mail, fax, email, or through the City's website as follows:





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City of Galveston
Community Outreach
823 Rosenberg
Galveston, TX 77550
Phone: 409.797.3546
Email: publicinformationoffice@galvestontx.gov
Website: www.galvestontx.gov

- 3) Affected citizens will receive notifications through electronic mailings, press releases, statements by public officials, media advertisements, public service announcements, newsletters, contacts with neighborhood organizations, and/or through social media.
- 4) All citizens have equal access to information about the programs, including persons with disabilities and limited English proficiency (LEP). In addition, the City will ensure that program information is available in the appropriate languages for the geographic area served by the jurisdiction. To ensure that program information is available to LEP populations, the City will utilize HUD's *Final Guidance to Federal Financial Assistance Recipients Regarding Title VI, Prohibition Against National Origin Discrimination Affecting Limited English Proficient Persons* in the Federal Register notice published January 22, 2007 (72 FR 2732).
- 5) Stakeholder consultation: The City will consult and conduct outreach for affected local governments, Indian Tribes, public housing authorities, nongovernmental organizations, the private sector, and other stakeholders and affected parties.
- 6) Consideration of public comments: The City will consider all written comments regarding specific applications for CDBG-DR/MIT assistance. A summary of the comments and the City's response to each will be included in the relevant application submitted to GLO for approval.





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- 7) Citizen complaints: The City will provide a timely written response to every citizen complaint received. The response will be provided within 15 working days of the receipt of the complaint, if practicable. In addition, citizens will be made aware of the City location, days, and hours when copies of the procedures will be available. Complaints regarding fraud, waste, or abuse of government funds will be forwarded to the HUD OIG Fraud Hotline (phone: 1-800-347-3735 or email: hotline@hudoig.gov).
- 8) The City will assist GLO to maintain their public website that provides information accounting for how all grant funds are used and managed/administered, including: links to all CDBG-DR/MIT applications; performance reports; citizen participation requirements; and activity/program information for activities described in its application, including details of all contracts and ongoing procurement policies.
- 9) All public notices, minutes, and attendance lists for any public hearings, meetings, or other citizen participation opportunities will be retained and submitted to GLO.

Post Funding Citizen Participation Efforts

Upon GLO approval for CDBG-MIT funding, the City will:

- 1) Maintain a compliant Citizen Participation File for each funded project.
- 2) Hold a public hearing any time a substantial change in use of CDBG-DR/MIT funds from one eligible activity to another is proposed. GLO will determine when change is substantial.
- 3) Retain all documentation of the hearing notice(s), attendance lists, minutes of the hearing(s), and any other records concerning the actual use of funds. In addition, the City's Record Retention Policy (regarding federal grants) will include language requiring the retention of all its grant-related documentation for 3 years from the date GLO closes the City's related disaster grant with HUD, or the term specified





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by GLO, whichever is shorter.

Post-funding, all CDBG-DR/MIT available to the public in accordance with Chapter 552, Government Code and the City's records retention requirements.

Citizen Participation Files

For each application, the City of Galveston will provide documentation that the citizen participation requirements were met in accordance with 84 FR 45838, 24 CFR 570.486, and GLO CDBG-DR/MIT Application Guide and Program Guidelines. In addition, the City's Citizen Participation File for each project will include, at a minimum, the following:

- 1) A copy of the CDBG-DR/MIT Citizen Participation Plan meeting all GLO CDBG-MIT requirements;
- 2) CDBG-MIT Complaint Procedures, Compliant Log, and copies of all compliant responses;
- 3) Detailed listing of all Technical Assistance (TA) provided during the administration of CDBG-MIT project activities; and
- 4) Public notices, minutes, and attendance lists for any public hearings, meetings, or other citizen participation opportunities.





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Revision History:

Version	Date	Page	Description
Version 1	08.27.20		Initial Draft Adopted
Version 2	10.28.22	1	Added "Community Development Block Grant – Disaster Recovery (CDBG-DR)"
		Throughout	Changed CDBG-MIT to CDBG-DR/MIT
		2	Added new section "Consistency with City CDBG Consolidated Plan".
		2	Added new section "Definitions" and the definition of the term "Residents of Predominantly Low- and Moderate-Income Neighborhoods".
		2	Added new section "Publication of Citizen Participation Plan".
		5	Changed the 72-hour publication requirement for notice of public hearings to 14 days in item 4(a).





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Approval

This Citizen Participation Plan Policy will take effect immediately after its approval. This document supersedes any previously approved version.

Adoption

The City of Galveston Citizen Participation Plan is hereby adopted by the City Council in regular session on this _____ day of _____, 2022.

AUTHORIZED SIGNATURE

PRINTED NAME, Title

DATE

