

City of Staunton, VA

CITIZEN PARTICIPATION PLAN

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

Adopted by City Council on _____

City of Staunton, VA

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DEVELOPMENT (HUD)**

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A. Introduction

Purpose

Pursuant to the citizen participation requirements of 24 CFR Section 91.105 and 24 CFR Part 5, the City of Staunton, VA (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:

- 1) The Citizen Participation Plan
- 2) The Consolidated Plan (CP)
- 3) The Annual Action Plan (AAP)
- 4) Analysis of Impediments to Fair Housing Choice (AI)
- 5) The Consolidated Annual Performance and Evaluation Report (CAPER), and
- 6) The Section 108 Loan Guarantee Program

Lead Agency

The Community Development Department of the City is the lead agency responsible for the administration of the Community Development Block Grant (CDBG) Program.

Effective Date

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

B. Encouragement of Citizen Participation

General

The City provides for and encourages citizens to participate in the development, revision, amendment, adoption and implementation of the Citizen Participation Plan, the Consolidated Plan, the Annual Action Plan, the Analysis of Impediments to Fair Housing Choice (AI), the CAPER, and the Section 108 Loan Guarantee Program. 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.

Non-English Speakers

The City has determined that, based on 2013-2017 American Community Survey data, one percent of residents speak English less than very well. Upon request, materials may be provided in Spanish.

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 *News Leader*:

The City of Staunton will make reasonable accommodations and services necessary for sensory-impaired and disabled citizens at the public meeting. Additionally, translation services may be offered upon request and availability. Persons requiring such accommodations/services should contact the City of Staunton's Clerk of Council at least five working days in advance of the meeting at simmonssf@ci.staunton.va.us or (540) 332-3810. TDD (540) 332-3968.

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

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 Consolidated Plan and the Annual Action Plan.

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 this Plan. This will be achieved through stakeholder interviews, focus groups and/or public meetings.

Local Public Housing Authority

The City, in consultation with Staunton Redevelopment and Housing Authority, 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 Staunton Redevelopment and Housing Authority about the Consolidated Plan activities related to the public housing developments and communities so that Staunton Redevelopment and Housing Authority can make this information available at the annual public hearings required for its Public Housing Authority Agency Plan.

Public Notices

Public review/comment periods and public hearings held in the process of developing, revising, amending, adopting and implementing the documents covered by this Plan shall be advertised in the *News Leader* no less than two weeks before the public hearing is held or the public comment begins.

Public Hearings

All public hearings will be scheduled at times and locations that are convenient for potential and actual program beneficiaries, and with accommodation for persons with disabilities and non-English speakers in accordance with this Plan.

Technical Assistance

The City's 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 program. All potential applicants are strongly encouraged to contact the Community Development Department for technical assistance before initiating a funding request application.

Online Access

The City will post draft copies and final copies of all documents covered by this Plan on its website accessible at <https://www.ci.staunton.va.us/departments/community-development>.

Other Engagement Techniques

The Plan may be amended as the City continues to gain access to technology that improves the avenues of participation by its residents.

City Contact Person

All communication regarding the Plan, the Consolidated Plan, the Annual Action Plan, the CAPER, comments, complaints, reasonable accommodation for disabled persons, translation services, or other elements shall be directed to: The City of Staunton, Director of Community and Economic Development, City Hall, 3rd Floor; 116 W. Beverley St.; Staunton, VA 24401; 540.332.3862

C. The Citizen Participation Plan

Citizen Participation Plan Development

The City shall follow the following procedure when developing its Citizen Participation Plan.

a. Public Review of the Draft Plan

The draft Citizen Participation Plan 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 Consolidated Plan. Copies of the draft Citizen Participation Plan will be made available for review at the following locations:

- Community Development Department; 116 W. Beverley St.; Staunton, VA 24401
- Economic Development Department; 116 W. Beverley St.; Staunton, VA 24401
- Staunton Public Library; 1 Churchville Avenue; Staunton, VA 24401
- Staunton Redevelopment and Housing Authority; 900 Elizabeth Miller Gardens; Staunton, VA 24401
- City of Staunton website:
<https://www.ci.staunton.va.us/departments/community-development>

b. Comments Received on Draft Amended Plan

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

c. Public Hearing

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

d. City Council Action

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

e. Submission to HUD

A copy of the Citizen Participation Plan, including a summary of all written comments and those received during the public hearing 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.

Amendments to the Approved Citizen Participation Plan

The City shall follow the following procedure to amend its approved Citizen Participation Plan, as needed.

a. Amendment Considerations

The City will amend the Plan, as necessary, to ensure adequate engagement and involvement of the public in making decisions related to its federal funding programs. Substantial amendments to the Citizen Participation Plan may be required should a provision of the Plan

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 Plan that only include updated contact information or editorial changes for clarity will not be released for public review and comment.

b. Draft Amended Plan Review

The draft Plan 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 Consolidated Plan. Copies of the draft Amended Plan will be made available for review at the following locations:

- Community Development Department; 116 W. Beverley St.; Staunton, VA 24401
- Economic Development Department; 116 W. Beverley St.; Staunton, VA 24401
- Staunton Public Library; 1 Churchville Avenue; Staunton, VA 24401
- Staunton Redevelopment and Housing Authority; 900 Elizabeth Miller Gardens; Staunton, VA 24401
- City of Staunton website:
<https://www.ci.staunton.va.us/departments/community-development>

c. Comments Received on Draft Amended Plan

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

d. Public Hearing

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

e. City Council Action

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

f. Submission to HUD

A copy of the Amended Citizen Participation Plan, including a summary of all written comments and those received during the public hearing 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.

Plan Access

The approved Citizen Participation Plan, and any amendments, will be kept on file in the Community Development Department, City Hall, 3rd Floor; 116 W. Beverley St.; Staunton, VA 24401

The Plan can be accessed online at: <https://www.ci.staunton.va.us/departments/community-development>

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

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D. The Consolidated Plan (CP)

Plan Development

The City will follow the process and procedures described below in the development of its Consolidated Plan (CP).

a. Stakeholder Consultation and Citizen Outreach

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

- Staunton Redevelopment and 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 CP 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 CP 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, mail surveys, internet-based feedback and surveys, focus groups, and/or consultation workshops.

b. Public Hearings

The City will conduct at least two public hearings in the development of the CP. The first public hearing will be conducted before the draft CP 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 hearing will be conducted during or after the 30-day public comment period during which the City will address identified housing and community development needs and proposed eligible activities.

c. 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 Plan, 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:

https://www.hud.gov/program_offices/administration/hudclips/handbooks/cpd/13780

d. Public Display and Comment Period

The draft CP 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 and purpose of the CP; 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 CP 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 CP will be made available for review at the following locations:

- Community Development Department; 116 W. Beverley St.; Staunton, VA 24401
- Economic Development Department; 116 W. Beverley St.; Staunton, VA 24401
- Staunton Public Library; 1 Churchville Avenue; Staunton, VA 24401
- Staunton Redevelopment and Housing Authority; 900 Elizabeth Miller Gardens; Staunton, VA 24401
- City of Staunton website:

<https://www.ci.staunton.va.us/departments/community-development>

e. Comments Received on the Draft Consolidated Plan

Written comments will be accepted by the Director of the City's Department of 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 hearings, in preparing the final CP. 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 CP for submission to HUD.

b. City Council Action

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

c. Submission to HUD

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

Revisions to the Consolidated Plan

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

a. Revision Considerations

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

- When an eligible activity is added
- When there is a change in the priorities identified in the CP

All other changes that do not meet the criteria defined above will be considered minor amendments, will be reviewed and approved by the City Manager and will not be subject to public comments. These changes will be fully documented and signed by the City Manager.

The City may choose to submit a copy of each amendment to the CP to HUD as it occurs, or at the end of the program year. Letters transmitting copies of amendments will be signed by the City Manager.

b. Public Display and Comment Period

The draft Revised CP 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 proposed revised CP 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 CP will be made available for review at the following locations:

- Community Development Department; 116 W. Beverley St.; Staunton, VA 24401
- Economic Development Department; 116 W. Beverley St.; Staunton, VA 24401
- Staunton Public Library; 1 Churchville Avenue; Staunton, VA 24401
- Staunton Redevelopment and Housing Authority; 900 Elizabeth Miller Gardens; Staunton, VA 24401
- City of Staunton website:
<https://www.ci.staunton.va.us/departments/community-development>

c. Public Hearing

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

d. Comments Received on the Draft Revised Consolidated Plan

Written comments will be accepted by the City's Director of Community and Economic 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 hearings, in preparing the final Revised CP. 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 CP for submission to HUD.

e. City Council Action

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

f. Submission to HUD

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

In the Event of a Disaster

In the event of a local, state or federally declared disaster where program funds covered by this Plan may be expended to carry out eligible activities to address the City's disaster response, the City's requirements under this Plan will be streamlined to include:

- a. A 3-day public display and comment period to amend the CP.
- b. A minimum of one public hearing shall be held to receive comments on the Revised CP.
- c. Following the public hearing, the Revised CP will be presented to City Council for consideration and formal action.
- d. The Revised CP will be submitted to HUD upon City Council approval.

Plan Access

The Revised CP will be kept on file at the Department of Community Development, City Hall, 3rd Floor; 116 W. Beverley St.; Staunton, VA 24401

The Plan can be accessed online at: <https://www.ci.staunton.va.us/departments/community-development>

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

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E. The Annual Action Plan (AAP)

The Annual Action Plan (AAP) is a component of the Consolidated Plan, and it describes the City's proposed use of available federal and other resources to address the priority needs and specific objectives in the CP 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.

Plan Development

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

a. Public Hearings

The City will conduct at least two public hearings during the development of the AAP. The first public hearing will be conducted before the AAP draft is published for public comment. During the first public hearing, 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 hearing will be conducted during or after the 30-day public comment period during which the City will address identified housing and community development needs, proposed eligible activities, and proposed strategies and actions for affirmatively furthering fair housing, consistent with the Analysis of Impediments to Fair Housing.

Both public hearings conducted for the Year 1 AAP may be conducted concurrently with the required public hearings for the five-year Consolidated Plan.

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:

- Community Development Department; 116 W. Beverley St.; Staunton, VA 24401
- Economic Development Department; 116 W. Beverley St.; Staunton, VA 24401
- Staunton Public Library; 1 Churchville Avenue; Staunton, VA 24401
- Staunton Redevelopment and Housing Authority; 900 Elizabeth Miller Gardens; Staunton, VA 24401
- City of Staunton website:
<https://www.ci.staunton.va.us/departments/community-development>

c. Comments Received on the Draft Annual Action Plan

Written comments will be accepted by the City’s Director of Community and Economic 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 hearings 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 hearing, 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.

Revisions to the Annual Action Plan

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 Community Development Department and will not be subject to public comments. These changes will be fully documented and signed by the Director of Community and Economic 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 Community and Economic 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:

- Community Development Department; 116 W. Beverley St.; Staunton, VA 24401
- Economic Development Department; 116 W. Beverley St.; Staunton, VA 24401
- Staunton Public Library; 1 Churchville Avenue; Staunton, VA 24401
- Staunton Redevelopment and Housing Authority; 900 Elizabeth Miller Gardens; Staunton, VA 24401
- City of Staunton website:
<https://www.ci.staunton.va.us/departments/community-development>

c. Public Hearing

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

d. Comments Received on the Draft Revised Annual Action Plan

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 hearings, 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 hearing, 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.

In the Event of a Disaster

In the event of a local, state or federally declared disaster where program funds covered by this Plan may be expended to carry out eligible activities to address the City's disaster response, the City's requirements under this Plan will be streamlined to include:

- a. A 3-day public display and comment period to amend the AAP.
- b. A minimum of one public hearing shall be held to receive comments on the Revised AAP.

- c. Following the public hearing, the Revised AAP will be presented to City Council for consideration and formal action.
- d. The Revised AAP will be submitted to HUD upon City Council approval.

Plan Access

The Revised AAP will be kept on file at the Department of Community Development, City Hall, 3rd Floor; 116 W. Beverley St.; Staunton, VA 24401

The Plan can be accessed online at: <https://www.ci.staunton.va.us/departments/community-development>

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

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F. Consolidated Annual Performance and Evaluation Report (CAPER)

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 Housing and Community Development Department will evaluate and report the accomplishments and expenditures of the previous program year for CDBG 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 *News Leader* no less than two weeks before the comment period begins with accommodation for persons with disabilities and non-English Spanish speakers in accordance with this Plan. 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:

- Community Development Department; 116 W. Beverley St.; Staunton, VA 24401
- Economic Development Department; 116 W. Beverley St.; Staunton, VA 24401
- Staunton Public Library; 1 Churchville Avenue; Staunton, VA 24401
- Staunton Redevelopment and Housing Authority; 900 Elizabeth Miller Gardens; Staunton, VA 24401
- City of Staunton website:
<https://www.ci.staunton.va.us/departments/community-development>

c. Comments Received on the Draft CAPER

Written comments will be accepted by the City's Director of Community and Economic 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 at the Department of Community Development, City Hall, 3rd Floor; 116 W. Beverley St.; Staunton, VA 24401

The Plan can be accessed online at: <https://www.ci.staunton.va.us/departments/community-development>

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

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G. Section 108 Loan Guarantee Program

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.

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:

- Community Development Department; 116 W. Beverley St.; Staunton, VA 24401
- Economic Development Department; 116 W. Beverley St.; Staunton, VA 24401
- Staunton Public Library; 1 Churchville Avenue; Staunton, VA 24401
- Staunton Redevelopment and Housing Authority; 900 Elizabeth Miller Gardens; Staunton, VA 24401
- City of Staunton website:
<https://www.ci.staunton.va.us/departments/community-development>

Comments Received on the Proposed Section 108 Application

Written comments will be accepted by the City's Director of Community and Economic 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.

Submission to HUD

The Section 108 Loan Application will be submitted to HUD.

H. Complaints

Residents may register complaints regarding any aspect of the CDBG program by contacting the City's Director of Community and Economic 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 Consolidated Plan, Annual Action Plan or any other documents identified in this Plan may send written objections to the HUD Field Office at:

U.S. Dept of Housing & Urban Development
Richmond Field Office
600 East Broad Street, 3rd Floor
Richmond, VA 23219-4920

Any written objections should be made within 30 days after the City has submitted any of the documents covered by this Plan 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 program 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.