

2025-2029 CITIZEN PARTICIPATION PLAN
FOR FEDERAL GRANTS FROM THE DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT
CITY OF SAN MARCOS, TEXAS

CONTENTS

I.	GENERAL PROVISIONS	3
A.	Applicability.....	3
B.	Participation.....	3
C.	Displacement	3
D.	Information Available	3
1.	Activities and Eligibility	3
2.	Documents.....	4
3.	Access to Records	4
4.	Technical Assistance to Applicants.....	4
E.	Reallocation of Funds.....	4
1.	Reallocation of funds	4
F.	Comment Periods	4
G.	Public Hearings.....	5
H.	Adoption	6
I.	Non-Substantial Amendments.....	6
1.	Definition	6
2.	Process.....	6
3.	Public Comment	6
4.	HUD Notification.....	6
J.	Complaints	6
II.	CITIZEN PARTICIPATION PLAN.....	6
A.	Comment Period	6
1.	Required	6
2.	Public Notice.....	6
B.	Timing	7
III.	CONSOLIDATED PLAN and ANNUAL ENTITLEMENT ACTION PLAN.....	7
A.	Participation.....	7
B.	Consultation of Area Agencies	7
C.	Comment Period	8
1.	Required	8

2025-2029 CITIZEN PARTICIPATION PLAN
FOR FEDERAL GRANTS FROM THE DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT
CITY OF SAN MARCOS, TEXAS

2.	Information Made Available	8
3.	Summary Publication	8
D.	Public Hearings.....	8
E.	Additional Step Required during Consolidated Plan Creation	9
F.	Additional Steps Required during the CDBG Entitlement Annual Action Plan Creation	9
G.	Definition of Substantial Amendment	9
H.	Timing	9
IV.	CONSOLIDATED ANNUAL PERFORMANCE AND EVALUATION REPORT (CAPER)	10
A.	Comment Period	10
1.	Required	10
2.	Public Notice	10
B.	Public Hearing	10
C.	Timing	10
V.	CDBG-DR DISASTER RECOVERY AND CDBG-MIT MITIGATION ACTION PLAN	10
A.	Comment Period	10
1.	Required	10
2.	Document Publication	10
B.	Public Hearing	10
1.	Required	10
C.	Information Available	11
1.	In General	11
2.	Amendments (Substantial and Non-Substantial)	11
D.	Public Webpages	11
E.	Definition of Substantial Amendment	12
F.	CDBG-MIT Citizen Advisory Group	12
G.	Application Status and Transparency	12

2025-2029 CITIZEN PARTICIPATION PLAN
FOR FEDERAL GRANTS FROM THE DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT
CITY OF SAN MARCOS, TEXAS

I. GENERAL PROVISIONS

A. Applicability

Residents shall be involved in prioritizing and planning of Community Development Block Grant (CDBG) activities. The City of San Marcos (City) created this Citizen Participation Plan to meet the requirement that the City adopt and follow a Citizen Participation Plan (CPP) found in federal regulations 24 CFR 91.105 for CDBG-Entitlement, 81 FR 39687 for CDBG-DR Disaster Recovery and 84 FR 45838 for CDBG-MIT Mitigation, pending regulations pertaining to CDBG-CV Coronavirus, and any subsequent notices.

This CPP pertains to the creation and amendment of planning and implementation documents (“the documents”) related to any grant received from the U.S. Department of Housing and Urban Development (HUD) by the City of San Marcos, including the following: Five Year Consolidated Plan, CDBG-Entitlement Action Plan, CDBG-MIT Mitigation Action Plan, CDBG-DR Disaster Recovery Action Plan, CDBG-CV Coronavirus Action Plans or amendments to existing plans, Analysis of Impediments to Fair Housing Choice (AI), Citizen Participation Plan, and the Consolidated Annual Performance Evaluation Report (CAPER).

B. Participation

The purpose of this CPP is to establish a means by which residents of the city of San Marcos, public agencies, and other interested parties can actively participate in the creation, implementation, and assessment of planning and implementation documents related to HUD grants.

The City encourages residents, public agencies, and other interested parties to participate in the creation or amendment of any of the documents. This CPP is designed especially to encourage participation by low- and moderate-income people, particularly those living in slum and blighted areas and in areas where CDBG funds are proposed to be used, and by residents of predominantly low- and moderate-income neighborhoods. The City will take whatever actions are appropriate to encourage the participation of all its residents, including minorities and non-English speaking persons, as well as persons with disabilities.

C. Displacement

The City of San Marcos will conduct all its Community Development activities to minimize the displacement of persons. The City is following a residential anti-displacement and relocation assistance plan required under section 104(d) of the Housing and Community Development Act of 1974, as amended. In the unlikely event that any person is displaced by Community Development activities, the City will comply with the acquisition and relocation requirements of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970.

D. Information Available

1. Activities and Eligibility

To permit public examination and to enhance public accountability, the City of San Marcos will make the following information available to residents, public agencies and other interested parties upon request:

- a. The amount of funds expected to be available for proposed Community Development activities,
- b. The range of eligible activities that may be undertaken with such funds, including the estimated amount that will benefit people of low and moderate income, and

2025-2029 CITIZEN PARTICIPATION PLAN
FOR FEDERAL GRANTS FROM THE DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT
CITY OF SAN MARCOS, TEXAS

c. The geographic areas which meet Community Development eligibility criteria.

2. Documents

The latest versions of the documents will be available to the public at the San Marcos Public Library and City Hall. Upon request, these materials will be made available in a form accessible to people with disabilities. The City will provide a reasonable number of free copies to residents and local groups that request a copy.

3. Access to Records

The City will provide residents, public agencies, and other interested parties with reasonable and timely access to information and records relating to the City's Consolidated Plan and the City's use of CDBG funds during the preceding five years.

4. Technical Assistance to Applicants

The City will provide technical assistance to groups representative of persons of low- and moderate-income that request such assistance in creating proposals for funding assistance under any of the programs covered by the Consolidated Plan.

E. Reallocation of Funds

1. Reallocation of funds

Reallocation of funds can occur as a separate amendment process that meets the criteria in this document, or as part of the Annual Action Plan approval process since it is conducted in a way to ensure that all criteria in this document are met.

F. Comment Periods

As part of creation or substantial amendment of the documents, the City will provide a public comment period of no less than the days shown in the table below. (24 CFR 91.105(d)(1))

Plan and Report	Required Public Comment Period Length
Five Year Consolidated Plan (ConPlan)	30-days (per 24 CFR 91.105(b)(4))
Annual Action Plan (AAP)	30-days (per 24 CFR 91.105(b)(4))
Citizen Participation Plan (CPP)	15-days
CAPER	15-days
CDBG-DR Action Plan	14-days
CDBG-MIT Action Plan	45-days
Analysis of Impediments to Fair Housing Choice	None

Notice of the comment period will be provided in English and Spanish by publication in a local newspaper and on the City's website at least 14 days before the start of the comment period and shall include the names and addresses of the locations where copies can be found for review.(24 CFR 91.105(e)(2)) (Note: CAPER notification must be 15 days before the comment period.)

During the comment period, copies of proposed documents will be available for viewing at the San Marcos Public Library and City Hall and on the City's website

2025-2029 CITIZEN PARTICIPATION PLAN

FOR FEDERAL GRANTS FROM THE DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT

CITY OF SAN MARCOS, TEXAS

The City will provide a reasonable number of free copies of the proposed document to anyone who requests it. Upon request, these materials will be made available in a form accessible to people with disabilities.

The City will consider any comments or views of residents and agencies received in writing, or orally at the public hearings, in preparing the document. A summary of these comments or views, and a summary of any comments or views not accepted and the reasons therefore, shall be attached to the final document.

During a declared disaster, the requirement to publish the notice and summary in a newspaper of general circulation described above may be suspended. The City shall at a minimum publish public notices on the City's website and promote such advertisements on social media as available. Furthermore, a shorter time period for notification may be allowable by HUD waivers. The timelines adopted will be those established by HUD at the time.

The Analysis of Impediments to Fair Housing Choice (AI) does not require a public comment period or public hearing. Substantial Amendments to the Analysis of Impediments to Fair Housing Choice will be approved by the City Manager. There are no further citizen participation requirements for amending the AI.

G. Public Hearings

1. Hearings shall be held at times and locations convenient to potential and actual beneficiaries. (24 CFR 91.105(e)(3))
2. Notices of the hearings will be published no less than 14 days prior to the date of the public hearing. (24 CFR 91.105(e)(2))
3. Hearings shall be held with accommodation for persons with disabilities. Hearings will be held in facilities that are physically accessible to individuals with disabilities, or if that is not possible, the information will be provided through alternative methods that allow for the most integration possible. Individuals who require auxiliary aids and services for a meeting should contact the City of San Marcos ADA Coordinator at 512-393-8000(voice) or call Texas Relay Service (TRS) by dialing 7-1-1. Requests can also be sent by e-mail to ADArequest@sanmarcostx.gov.
4. In the case of public hearings where a significant number of non-English speaking residents can be reasonably expected to participate, public comments written in Spanish will be translated, and a Spanish translator will be present.
5. The City may meet public hearing requirements with virtual public hearings if:
 - a. national/local health authorities recommend social distancing and limiting public gatherings for public health reasons; and
 - b. virtual hearings provide reasonable notification and access for residents in accordance with the grantee's certifications, timely responses from local officials to all resident questions and issues, and public access to all questions and responses.

2025-2029 CITIZEN PARTICIPATION PLAN
FOR FEDERAL GRANTS FROM THE DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT
CITY OF SAN MARCOS, TEXAS

H. Adoption

After the public hearing (when required) and discussion, City Council will adopt a Resolution approving the document. While the residents and agencies of the City of San Marcos will provide input and direction for the creation of the documents, City Council will have the ultimate responsibility to determine how and where HUD Grant funds will be spent.

I. Non-Substantial Amendments

1. Definition

A non-Substantial Amendment is hereby defined to be any amendment that is not included in the definitions of Substantial Amendments in this CPP.

2. Process

Non-Substantial Amendments will be considered administrative revisions and will be accomplished by Planning and Development Services Department staff.

3. Public Comment

The City is not required to receive public comment for an amendment that is not considered a Substantial Amendment.

4. HUD Notification

The City will notify HUD of a Non-Substantial Amendment at least five business days before the amendment becomes effective.

J. Complaints

The City will provide a timely, substantive written response to every written complaint related to the City's HUD Grants within 15 working days. Complaints may be submitted in writing to the attention of the Community Development Block Grant Division, Planning and Development Services Department, 630 East Hopkins Street, San Marcos TX 78666. Complaints may also be submitted by e-mail to cdbg@sanmarcostx.gov. For more information about filing a complaint, contact the CDBG program office at 512-805-2644.

Complaints regarding fraud, waste, or abuse of government funds will be forwarded the Department of Housing and Urban Development Office of Inspector General (Phone: 1-800-347-3735 or by email: hotline@hudoig.gov).

II. CITIZEN PARTICIPATION PLAN

A. Comment Period

1. Required

As part of creation or amendment of the Citizen Participation Plan, a comment period as described in Section I.F. above is required

2. Public Notice

The notice announcing the comment period shall include a description of the purpose of the CPP as well as the other information described in Section I.F. above.

2025-2029 CITIZEN PARTICIPATION PLAN
FOR FEDERAL GRANTS FROM THE DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT
CITY OF SAN MARCOS, TEXAS

B. Timing

The Citizen Participation Plan will be evaluated every five years by City Council and will be revised as needed, then resubmitted to HUD as part of the Consolidated Plan.

III. CONSOLIDATED PLAN AND ANNUAL ENTITLEMENT ACTION PLAN

A. Participation

The City encourages the participation of local and regional institutions, the Continuum of Care and other organizations (including businesses, developers, nonprofit organizations, philanthropic organizations, and community-based and faith-based organizations) in the process of creating and implementing the Consolidated Plan and Annual Entitlement Action Plan.

The City encourages, in conjunction with consultation with public housing agencies, the participation of residents of public and assisted housing developments, in the process of creating and implementing the Consolidated Plan and Annual Entitlement Action Plans along with other low-income residents of targeted revitalization areas in which the developments are located.

B. Consultation of Area Agencies

1. Under **24 CFR.91.100 (a)(1)** as part of the Consolidated Plan creation process, the City shall consult with other public and private agencies that provide assisted housing, health services, and social services, including those focusing on services to children, elderly persons, persons with disabilities, people with HIV/AIDS and their families, and homeless persons. The City will incorporate consultation of agencies that narrow the digital divide and evaluate the vulnerability of LMI households to natural hazards such as climate change and other natural hazards. The City shall also consult with community-based and regionally based organizations that represent protected class members and organizations that enforce fair housing laws when preparing the Consolidated Plan including participants in Fair Housing organizations, nonprofit organizations that receive funding under the Fair Housing Initiative Program and other public and private fair housing service agencies, to the extent that such entities operate within the jurisdiction. Additionally, the consultation process will include consultation with regional government agencies in addition to adjacent units of general local government and local government agencies. This includes local government agencies with metropolitan-wide planning and transportation responsibilities, partially for problems and solutions that go beyond the City's jurisdiction.
2. Under **24 CFR.91.100 (c)(1)** as part of the Consolidated Plan development process, the City shall also consult with public housing authorities (PHAs) operating within the jurisdiction. This consultation will continue to consider public housing needs, planned programs and activities under the Consolidated Plan as well as strategies for affirmatively furthering fair housing specifically to address any fair housing issues in the public housing and Housing Choice Voucher programs. The consultation process requires the City to address the needs of public housing and, where necessary, the way it will provide financial or other assistance to a troubled PHA to improve the PHA's operations and remove the designation of troubled.

2025-2029 CITIZEN PARTICIPATION PLAN
FOR FEDERAL GRANTS FROM THE DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT
CITY OF SAN MARCOS, TEXAS

C. Comment Period

1. Required

As part of Consolidated Plan or Annual Entitlement Action Plan creation or substantial amendment, a Comment Period as described in Section I.F. above is required.

2. Information Made Available

Before the City adopts a Consolidated Plan, Annual Action Plan, or substantial amendment, as part of the comment period, the City will make available to the public the following information:

- a. The amount of assistance the City expects to receive (including grant funds and program income), and
- b. The range of activities that may be undertaken, and
- c. The estimated amount that will benefit people of low- and moderate income.

3. Summary Publication

As part of the comment period, the City will publish a summary of the proposed Consolidated Plan or Annual Action Plan or substantial amendment in the local newspaper and on the City's website. The summary will include the following:

- a. Description of the contents and purpose, and
- b. A list of locations where copies of the entire proposed Consolidated Plan or Annual Action Plan may be examined.

D. Public Hearings

Per 24 CFR 91.105(e)(1)(i) at least two public hearings per year must be held to obtain residents' views and to respond to proposals and questions, to be conducted at a minimum of two different stages of the program year. **These two public hearings will be held as part of the creation of the Annual Action Plan.** Together, the hearings must address housing and community development needs, development of proposed activities, proposed strategies and actions for affirmatively furthering fair housing, and a review of program performance.

The City shall hold at least one public hearing before City Council during the creation or substantial amendment of the Consolidated Plan or Annual Action Plan, **before the proposed Consolidated Plan or Annual Action Plan is published for comment** (24 CFR 91.105(e)(ii)), to obtain the views of the public on housing and community development needs, including non-housing community development needs, and the selection of proposed activities.

The City shall hold a second public hearing on or before the day of Council decision about allocating the funds during the creation of the Annual Action Plan.

The hearings will be held in accordance with the public hearing requirements as described in Section I.G. above.

2025-2029 CITIZEN PARTICIPATION PLAN
FOR FEDERAL GRANTS FROM THE DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT
CITY OF SAN MARCOS, TEXAS

E. Additional Step Required during Consolidated Plan Creation

To encourage ample public participation in HUD Grant programs, during the creation of the Five-Year Consolidated Plan, workshops and meetings will be held with local social service agencies, local government agencies, Neighborhood Associations, health care and assisted housing providers and City staff to receive input and information regarding the City of San Marcos' needs for the Plan's five-year period. The purpose of these workshops and meetings is to gather information and data on the community and economic development needs of the community.

F. Additional Steps Required during the CDBG Entitlement Annual Action Plan Creation

Per 24 CFR Part 91, the City of San Marcos is required to create an Annual Action Plan that details the projects to be undertaken with CDBG funds for the upcoming year. The following steps must be taken during the creation of the annual Action Plan:

1. Staff will conduct at least one stakeholder meeting before the application deadline. The meeting will be held at a time and location convenient to potential and actual beneficiaries and with accommodations for persons with disabilities.
2. Funding applications will be made available to the public. Staff will review the applications received by the application deadline for compliance and eligibility. If deficiencies in the application are found, the applicant will be notified in writing and provided ten days in which to correct the deficiencies.
3. All eligible applications will be submitted to the City Council for their review and consideration in determining which projects will be awarded funding.
4. The City shall hold a second public hearing on or before the day of Council decision about allocating the funds during the creation of the Annual Action Plan. Following the public hearing, Council will award the allocation for the program year.

G. Definition of Substantial Amendment

The following constitute a substantial amendment to the Five-Year Consolidated Plan or the CDBG Entitlement Annual Action Plan.

1. The addition of a new project to the current Annual Action Plan, or
2. Any funding change to an existing project in excess of 10% of the annual allocation amount of the current program year, or
3. Changes in the use of grant funds from one eligible activity to another, as "Eligible Activity" is defined in 24 CFR 570 Subpart C. (This is the same as a "Project" in the Annual Action Plan Section AP-35 and the HUD IDIS software), or
4. Any change in the priorities of the Five-Year Consolidated Plan.

H. Timing

The Consolidated Plan is due to HUD in August every five years (2020, 2025, etc.). The Annual Action Plan is due to HUD in August every year.

2025-2029 CITIZEN PARTICIPATION PLAN
FOR FEDERAL GRANTS FROM THE DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT
CITY OF SAN MARCOS, TEXAS

IV. CONSOLIDATED ANNUAL PERFORMANCE AND EVALUATION REPORT (CAPER)

A. Comment Period

1. Required

As part of the annual CAPER process, a comment period as described in Section I.F. above is required.

2. Public Notice

The notice announcing the comment period shall include a list of the contents and description of the purpose of the CAPER as well as the other information described in Section I.F. above.

B. Public Hearing

The City shall hold at least one public hearing before City Council after publication of the above public notice and conclusion of the comment period, to review program performance and to obtain public comments and input for the direction of the CDBG Entitlement programs. The hearing will be held in accordance with the public hearing requirements as described in Section I.G. above.

C. Timing

The CAPER is due to HUD annually in December, at most ninety days after the program year ends September 30.

V. CDBG-DR DISASTER RECOVERY AND CDBG-MIT MITIGATION ACTION PLAN

A. Comment Period

1. Required

- a. CDBG-DR - As part of the creation or substantial amendment of the CDBG-DR Disaster Recovery Action Plan, a comment period as described in Section I.F. above is required.
- b. CDBG-MIT - As part of the creation or substantial amendment of the CDBG-MIT Mitigation Action Plan, a comment period as described in Section I.F. above is required.

2. Document Publication

Before adopting a CDBG-DR or CDBG-MIT action plan or substantial amendment, the City will publish the proposed action plan or amendment in the following manner:

- a. The action plan or amendment must be prominently posted on the City's official website.
- b. The topic of disaster recovery or mitigation (as applicable) must be navigable from the City's homepage.

B. Public Hearing

1. Required

- a. CDBG-DR - The City shall hold at least one public hearing before City Council during the creation or substantial amendment of a CDBG-DR Action Plan, before the proposed Action Plan is published for comment, to obtain the views of citizens on disaster recovery needs and

2025-2029 CITIZEN PARTICIPATION PLAN
FOR FEDERAL GRANTS FROM THE DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT
CITY OF SAN MARCOS, TEXAS

the selection of proposed activities. The hearing will be held in accordance with the public hearing requirements as described in Section I.G. above.

- b. CDBG-MIT - The City shall hold at least two public hearings in the HUD-identified Most Impacted and Distressed Areas during the creation or substantial amendment of the CDBG-MIT Mitigation Action Plan. At least one of these public hearings must occur prior to the City's publication of the action plan on its website. Each hearing must be conducted at different locations within the Most Impacted and Distressed Area in locations that ensure geographic balance and maximum accessibility. The purpose of the hearings is to obtain the public's views and to respond to proposals and questions. The hearings will be held in accordance with the public hearing requirements as described in Section I.G. above.

C. Information Available

1. In General

During the active term and record retention period of the CDBG-MIT and CDBG-DR grants, the City will provide residents and other interested parties with reasonable and timely access to information and records relating to the action plan and to the grantee's use of grant funds. Information will be made available in a form accessible to persons with disabilities and those with limited English proficiency, upon request.

2. Amendments (Substantial and Non-Substantial)

- a. As they occur, all amendments will be numbered sequentially and posted on the City's website. Copies of amendments will be available upon request to: cdbg@sanmarcostx.gov or 512-805-2644.
- b. The most current version of the entire action plan for CDBG-DR and CDBG-MIT will be accessible for viewing as a single document for each. Each amendment will be highlighted as a change in the document.
- c. At the time of each amendment the following information will be provided separately:
 - i. The exact content that has been added, deleted, or changed;
 - ii. A revised budget allocation table that reflects all funds and illustrates where funds are moving from and to; and
 - iii. A description of how the amendment is consistent with the needs assessment document that was used to draft the grant's Action Plan.

D. Public Webpages

The City shall maintain public web pages that specifically provide information on how CDBG-DR and CDBG-MIT funds are used, managed, and administered. The following items shall be available on the Disaster Recovery and Mitigation web pages, and upon request from the City in accordance with open records procedures:

1. The action plan and all amendments
2. Performance reports

2025-2029 CITIZEN PARTICIPATION PLAN
FOR FEDERAL GRANTS FROM THE DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT
CITY OF SAN MARCOS, TEXAS

3. Citizen participation requirements
4. Information about activities, projects, and programs
5. All executed contracts that will be paid with grant funds
6. Procurement policies and procedures
7. The status of services or goods currently being procured

E. Definition of Substantial Amendment

1. CDBG-DR - The following constitute a substantial amendment to the CDBG-DR Disaster Recovery Action Plan:
 - a. A change in program benefit or eligibility criteria; or
 - b. The addition or deletion of an activity; or
 - c. The allocation or reallocation of more than \$1 million between activities.
2. CDBG-MIT - The following constitute a substantial amendment to the CDBG-MIT Mitigation Action Plan:
 - a. The addition of a CDBG-MIT Covered Project, or
 - b. A change in program benefit or eligibility criteria, or
 - c. The addition or deletion of an activity, or
 - d. A new allocation or reallocation of more than 25 percent of an activity in the Program Budget.

F. CDBG-MIT Citizen Advisory Group

The City has formed a citizen advisory committee that meets at least twice annually in order to provide increased transparency in the implementation of the CDBG-MIT funds, to solicit and respond to public comment and input regarding the City's mitigation activities, and to serve as an on-going public forum to continuously inform the City's CDBG-MIT projects and programs.

G. Application Status and Transparency

1. For applications received for CDBG-MIT or CDBG-DR assistance, the City will provide multiple methods of communication to provide applicants with timely information to determine the status of their application for assistance, including by phone, by mail, and in person.
2. When competitively awarding CDBG-MIT or CDBG-DR funds, the City will publish on the applicable website the following information:
 - a. Eligibility requirements for the funding, and
 - b. All criteria to be used by the City in the selection of applications for funding, including the relative importance of each criterion, and
 - c. The time frame for consideration of applications.

The City will maintain documentation to demonstrate that each funded and unfunded application was reviewed and acted upon by the City in accordance with the published eligibility requirements and funding criteria.