

Pinellas County
Community Development Block Grant – Disaster Recovery (CDBG-DR)
Citizen Participation Plan (CPP)

I. Overview

Pinellas County (County) has developed this Citizen Participation Plan (CPP) in compliance with the following regulations and Federal Register Notices (FRNs) for the Community Development Block Grant – Disaster Recovery (CDBG-DR) grant funds awarded to the County in response to Hurricanes Idalia, Helene, and Milton that occurred in 2023 and 2024:

- Federal Register Notice 90 FR 1754 on January 8, 2025 (The Universal Notice) and as amended on March 19, 2025, at FR-6489-N-01 and in subsequent revisions issued by HUD
- Federal Register Notice 90 FR 4759 on January 16, 2025 (Allocation Notice)
- 24 CFR 91.105

Housing and Urban Development's (HUD) citizen participation requirements. To permit a more streamlined process and ensure disaster recovery grants are awarded in a timely manner, provisions of 42 U.S.C. 5304(a)(2) and (3), 42 U.S.C. 12707, 24 CFR 570.486, 24 CFR 1003.604, 24 CFR 91.105(b) through (d), with respect to citizen participation requirements, are waived and replaced by the alternative requirements in 90 FR 1754 (January 8, 2025).

Under the streamlined requirements, Pinellas County will hold a minimum of three public hearings on the published draft Action Plan and provide a reasonable opportunity (30 calendar days) for public comment. Pinellas County will follow this CPP that satisfies the requirements of 24 CFR 91.105 (except as provided for in FRNs providing waivers and alternative requirements). In addition to electronic mailings, the County may use the following methods to notify residents about public hearings: press releases, statements by public officials, media advertisements, social media, public service announcements, and/or contacts with neighborhood organizations, any other methods that the County determines would constitute effective outreach.

The Pinellas County Housing and Community Development Department will be responsible for ensuring that the requirements in this CPP are enforced throughout the duration of the County's administration of the CDBG-DR grant funds for Hurricanes Idalia, Helene, and Milton.

II. Citizen Participation Plan Development and Amendments

Initial Citizen Participation Plan: This CPP was developed to comply with the requirements specified in the above-referenced FRNs governing the administration of Pinellas County's CDBG-DR grant funds for Hurricanes Idalia, Helene, and Milton.

Public Comment and Availability: The County will provide citizens with a reasonable opportunity to comment on its original CDBG-DR citizen participation plan and on any amendments to the plan and will make the citizen participation plan and proposed amendments available for public review, including information in a format accessible to persons with disabilities, upon request. Notice of the plan or an amendment will be posted on the County's website and will provide sufficient information about the plan and/or amendment to permit informed comment. The notice will include the location for viewing the plan, indicate the dates of the comment period and provide a means for transmitting comments to the Housing and Community Development Department. The notice will be published in a newspaper of general circulation in legible print and in a section of the paper other than the legal section.

The County will provide a period of at least fifteen (15) days to receive comments on the Plan or amendment(s) to the Plan and will consider all public comments received in the Plan's finalization process. This CPP, as well as any amendments to the Plan, will be made available for review and comment on the Pinellas County disaster recovery website (<https://recover.pinellas.gov/>) and submitted to the Board of County Commissioners for approval.

CDBG-DR Action Plan

Initial CDBG-DR Action Plan: The initial CDBG-DR Action Plan for Pinellas County's Hurricanes Idalia, Helene, and Milton grant funds is being developed in accordance with FRNs Vol. 90, No. 5 (January 8, 2025) and amendments thereto, and Vol. 90, No. 10 (January 16, 2025) and will be published for public comment, with a 30-day public comment period. Following the required consultations, public hearings and public comment period, the CDBG-DR Action Plan will be submitted to HUD within 90 days of the effective date of the Allocation Announcement (FRN Vol. 90 No. 10), unless an extension is granted. HUD has provided the County with an extension of the deadline for Action Plan submission to June 20, 2025.

Following HUD approval of the Action Plan and the County's accompanying certifications, and any revisions required by HUD, HUD will transmit a CDBG-DR grant agreement to the County. Prior to receiving the CDBG-DR grant agreement, Pinellas County will certify to HUD that the County is implementing a detailed Citizen Participation Plan (this Plan) that satisfies the requirements of 24 CFR 91.105 (except as provided for in waivers and alternative requirements).

Consultation: Pinellas County will consult with various stakeholders, including the public, and inform residents about any funding decisions prior to submitting the Action Plan to HUD for review. Additionally, the County will consult with the State of Florida, any impacted Indian Tribes, local governments, Federal partners, nongovernmental organizations, the private sector, and other stakeholders and affected parties in the surrounding geographic area during Action Plan preparation to ensure consistency of the Action Plan with applicable regional development plans.

Pinellas County will consult with other relevant government and local agencies, including State and local emergency management agencies that have primary responsibility for the administration of FEMA funds, agencies that manage local Continuums of Care, Public Housing Agencies, and HUD approved housing counseling agencies, as applicable.

Action Plan Development

Pinellas County encourages all of the County's citizens, especially low-income and moderate-income persons, particularly those persons living in areas designated by the County as a revitalization area or in a slum and blighted area and in areas where the CDBG-DR grant funds are proposed to be utilized, residents of predominantly low-income and moderate-income neighborhoods and persons with disabilities, to participate in the development of the CDBG-DR Action Plan, and any substantial amendments to the CDBG-DR Action Plan (and performance reports).

The County encourages the participation of local and regional institutions, Continuums of Care, and other organizations (including businesses, developers, nonprofit organizations, philanthropic organizations, and community-based and faith-based organizations) in the process of developing and implementing the Action Plan.

Examples of organizations that may assist in this process include, but are not limited to, the Homeless Leadership Alliance (HLA), the Juvenile Welfare Board, the United Way of the Suncoast, the Office of Human Rights, the Housing Finance Authority, and other human service agencies serving residents of the County.

The County also encourages, in conjunction with consultation with public housing agencies, the participation of residents of public and assisted housing developments (including any resident advisory boards, resident councils, and resident management corporations) in the process of developing and implementing the Action Plan, along with other low-income residents of targeted revitalization areas in which the developments are located.

The County will set forth its plans to minimize displacement of persons and to assist any persons displaced in its individual program policies and procedures, as required by the applicable FRN.

Public Hearings: For the initial draft published CDBG-DR Action Plan, Pinellas County will hold a minimum of three (3) public hearings and provide a reasonable opportunity for citizen comment and ongoing citizen access to information about the County's use of the CDBG-DR grant funds.

A notice of all public hearing will be published in a newspaper of general circulation in the County in legible print and in a section of the paper other than the legal section for

a minimum of fourteen (14) days prior to the date of the initial public hearing. The County will utilize the County's disaster website, social media, new releases, electronic mailings and other forms of community outreach to publicize all public hearings.

The County will hold each hearing in a different location within the County and will select locations that will promote a geographic balance and maximize accessibility for stakeholders to actively participate. All in-person hearings will be in the County (the HUD Most Impacted and Distressed area) and in facilities that are physically accessible to persons with disabilities. If the County conducts a virtual hearing, the County will allow questions in real time, with answers coming directly from County representatives to all attendees.

Additionally, for both virtual and in-person hearings, the County will:

- Hold hearings at times and locations convenient to potential and actual beneficiaries,
- Provide accommodation for persons with disabilities, and
- Ensure effective communication for individuals with disabilities, including through the provision of auxiliary aids and services, consistent with 24 CFR 8.6, establishing HUD's regulations about effective communication.

Persons requesting oral or written translation services for any public hearing are requested to contact the Pinellas County Housing and Community Development Department at 727-464-8210.

Public Comments: Following the development of the initial Action Plan, the County will publish the proposed Action Plan for public comment. The manner of publication will include prominent posting on the County's disaster recovery website (<https://recover.pinellas.gov/>) and will afford residents, affected local governments, and other interested parties 30 days to review the Action Plan. The County will endeavor to identify and redress any potential barriers that may limit or prohibit disaster-impacted populations from providing public comment on the Action Plan or substantial amendments. The County's efforts will consider how it can address barriers to participation (e.g., a lack of childcare and/or transportation) that may limit individuals from participating in public hearings, providing comments, or other engagement events or techniques.

The County will consider all oral and written comments on the Action Plan and will provide timely responses to all citizen questions and issues. Any updates or changes made to the Action Plan in response to public comments will be clearly identified in the Action Plan. A summary of comments on the Action Plan, and the County's response to

each, will be included with the Action Plan. The County's responses to comments will address the substance of the comment rather than merely acknowledge that the comment was received. The County will provide public access to the Action Plan, including all questions and responses.

III. Action Plan Amendments

Each amendment to the Action Plan will be published on the County's disaster recovery website (<https://recover.pinellas.gov/>) with a description of the changes within the context of the entire Action Plan. The County's current version of its entire Action Plan will be accessible for viewing as a single document at any given point in time. Every amendment to the Action Plan (substantial and non-substantial) will be numbered sequentially on the County's website.

Substantial Amendments to CDBG-DR Action Plan: The CDBG-DR Action Plan specifies that the following criteria will constitute a Substantial Amendment to the CDBG-DR Action Plan:

- Changing program benefits and/or eligibility criteria (including the expansion of eligible beneficiaries (e.g., establishing a new grantee-identified MID area);
- Adding and/or deleting an activity;
- Proposing a reduction in the overall benefit requirement;
- Re-allocating funds from one budget allocation in the CDBG-DR Action Plan to another budget allocation in the CDBG-DR Action Plan so that the re-allocated amount is equal to or greater than 10 percent of the total budget amount.
- An update to the submitted initial Action Plan if the original submission was incomplete with regard to the maximum amount of program awards, income limits or changes to the criteria for award, as provided in applicable FRN.

For all substantial amendments, the County will follow the same procedures required for the preparation and submission of an Action Plan, with the exception, as noted above, that no public hearing or consultation on a substantial or non-substantial amendment is required.

Public Comments: Pinellas County will provide a 30-day public comment period prior to Pinellas County's submission of a Substantial Amendment to HUD. The Substantial Amendment will be published on Pinellas County's website (<https://recover.pinellas.gov/>) to allow citizens, affected local governments, and interested parties an opportunity to review and comment on the proposed Substantial Amendment.

Any updates or changes to the CDBG-DR Action Plan that are made in response to submitted public comments received by Pinellas County will be clearly identified in the CDBG-DR Action Plan's Substantial Amendment. A summary of the public comments regarding the Substantial Amendment, and Pinellas County's response to each, will also be included in the Substantial Amendment's finalization process. The County's responses to comments will address the substance of the comment rather than merely acknowledging that the comment was received.

Non-Substantial Amendments to CDBG-DR Action Plan: An amendment to the CDBG-DR Action Plan that does not meet any of the above criteria for Substantial Amendments will be considered a Non-Substantial Amendment.

Non-Substantial Amendments may be made at the discretion of Pinellas County and do not require a public comment period. Notice of a Non-Substantial Amendment will be provided through Pinellas County's disaster recovery website. Pinellas County will notify HUD five (5) business days before the Non-Substantial Amendment is effective or when Pinellas County makes any amendment to the CDBG-DR Action Plan that is not considered to be a Substantial Amendment, and Pinellas County will publish the Non-Substantial Amendment on Pinellas County's website (<https://recover.pinellas.gov/>)

IV. Meetings

Public meetings may be held as deemed necessary throughout the course of the County's CDBG-DR grant. The County will provide residents with reasonable and timely access to local meetings, consistent with accessibility and reasonable accommodation requirements; and will provide reasonable and timely notice of all meetings so that all interested parties may have a chance to attend.

V. Availability to the Public

Pinellas County will ensure that the CDBG-DR Action Plan, substantial amendments to the Action Plan and performance reports will be available to the public, including in a form accessible to persons with disabilities, upon request.

Upon request, this CPP, the Action Plan and any Substantial Amendments will be provided in a format to accommodate persons with disabilities (e.g., oral, Braille, electronic, or large print copies for the visually impaired; and/or delivering copies to the homebound).

VI. Access to Records

During the term of the CDBG-DR Grant Program for Hurricanes Idalia, Helene, and Milton and/or any of HUD's disaster recovery grant programs that are or may be administered by Pinellas County, Pinellas County will provide residents of the community, public agencies, and other interested parties with reasonable and timely access to information and records related to the CDBG-DR Action Plan, Substantial Amendments and Non-Substantial Amendments to the CDBG-DR Action Plan, performance reports, and use of assistance under the programs covered by the Action

Plan during the preceding five (5) years – and after a reasonable time to retrieve records.

All records and information relating to CDBG-DR and amendments, and the use of funds under the plans will be available for public inspection for a period of not less than five years. This information is available for viewing at the Community Development Division of the Pinellas County Housing and Community Development Department at the address below during regular working hours, Monday through Friday excluding County holidays:

Pinellas County Housing and Community Development Department
440 Court Street, 2nd Floor Clearwater, FL 33756
Telephone: 727- 464-8210
FAX: 727-464-8254

Since older records may be in storage, a two-day waiting period may be necessary while the information is retrieved. In all cases, persons wishing to view records or documents must set up an appointment at least 24 hours in advance with Pinellas County Housing and Community Development so that the requested information may be gathered together. A reasonable number of copies will be made available without charge to the person requesting documents. Numerous copies are available for a nominal fee in accordance with State law.

VII. Complaints and Grievances

As required per the applicable FRNs and 24 CFR § 91.105(j), Pinellas County will provide a timely, substantive written response to every written complaint received by Pinellas County. The County's response will be provided within fifteen (15) working days of the County's receipt of the complaint. If a response cannot be provided within the fifteen (15) working daytime period, the County will document the reason(s) why additional time for the response is required.

Complaints and grievances are to be stated in writing by the aggrieved party or his/her representative, and are to be submitted to the applicable local, state, or federal government agency, for resolution.

All such comments, complaints, and grievances submitted to Pinellas County or to HUD shall be addressed in writing to the following designees:

PINELLAS COUNTY:

Pinellas County Housing and Community Development Department
440 Court Street, 2nd Floor Clearwater, FL 33756
Telephone: 727- 464-8210
FAX: 727-464-8254

HUD:

United States Department of Housing and Urban Development
Office of Community Planning and Development
400 West Bay Street, Suite 1015, Jacksonville, FL 32202

Records of the citizens' comments and complaints that have been received by the County concerning its CDBG-DR Program, and records of the subsequent actions that have been taken by County in response to those comments and complaints, shall be maintained on file at the offices of County's Housing and Community Development Department and shall be made available for public review and inspection upon request.

All verbal complaints received by Pinellas County will be considered informal and will not be subject to the same complaint resolution process described above. Pinellas County will attempt to resolve any such verbal complaint(s) it receives.

Complaints alleging violation of fair housing laws will be directed to HUD for immediate review and can be submitted multiple ways—via email, phone, online, or mail. To speak with a Fair Housing Equal Opportunity (FHEO) intake specialist, complainants are requested to call 1-800-669-9777. To speak with a local FHEO office (**Region IV** includes Florida), complainants are requested to call 1-800-440-8091.

Complaints regarding fraud, waste, or abuse of funds will be forwarded to the HUD Office of Inspector General Fraud Hotline (phone: 1-800-347-3735 or email: hotline@hudoig.gov). Pinellas County will make available to HUD detailed Fraud, Waste, and Abuse Policies and Procedures on (<https://pinellas.gov/cdbg-dr/>) to demonstrate adequate procedures are in place to prevent fraud, waste, and abuse.

VIII. Consultation and Public Input for Program Policies and Procedures

To promote effective program design and public transparency, the County will engage in the consultations and disaster website posting requirement prescribed by the applicable FRN(s).

Publication of program specific policies and procedures. Pinellas County will prominently post its final individual CDBG-DR program-specific policies and procedures on the County's disaster recovery website (<https://recover.pinellas.gov/>) within the timelines required by HUD. The County will make these program-specific policies and procedures available to the public on its disaster recovery website before accepting applications for that program, along with the County's projected timeline for expenditures and outcomes.

Public Disaster Recovery Website and Document Availability

The County will maintain a public disaster recovery website (<https://recover.pinellas.gov/>) that permits individuals and entities awaiting assistance and the general public to see how all CDBG-DR grant funds are used and administered.

The public website will be accessible to persons with disabilities in compliance with Section 504, Title II of the ADA and Title VI.

Publication and accessibility of documents: The County's disaster recovery website will include copies of all relevant procurement documents and, except as noted below, all County-administrative contracts, details of ongoing procurement processes, and action plans and amendments. To meet this requirement, the County will make the following items available on its website:

- the Action Plan (including all amendments);
- each quarterly performance report (as created using HUD's **DRGR** system);
- the County's citizen participation plan (and all amendments);
- County procurement policies and procedures;
- CDBG-DR program-specific policies and procedures including a projection of expenditures and outcomes;
- application status, as reflected in individual CDBG-DR program policies and procedures;
- all contracts, as defined in federal regulations at 2 CFR 200.22, that will be paid with CDBG-DR funds (including, but not limited to, subrecipients' contracts); and a summary including the description and status of services or goods currently being procured by the grantee or the subrecipient (e.g., phase of the procurement, requirements for proposals, etc.). *(Contracts and procurement actions that do not exceed the micro-purchase threshold, as defined in 2 CFR 200.1, are not required to be posted to a grantee's website.)*

The County will provide updates to its disaster recovery site at least quarterly.

The County will make these required documents available on its disaster recovery website in a form accessible to persons with disabilities and other populations identified in the applicable FRN.

Persons with disabilities or special needs who may require special materials, services, or assistance with accessing program materials are requested to contact the Pinellas County Housing and Community Development Department at 727-464-8210 or by email at cdplanning@pinellas.gov.

IX. Quarterly Performance Report

Once HUD has approved a County quarterly performance report, the County will publish a version of the performance report that omits any personally identifiable information on its disaster recovery website (<https://recover.pinellas.gov/>) within three (3) calendar days of HUD's approval.

X. Technical Assistance

Pinellas County may provide technical assistance to facilitate citizen participation when requested, including responding to technical assistance requests made by citizens. The level and type of technical assistance to be requested may be determined, in part, by

the units of local government who are subrecipients of Pinellas County's CDBG-DR Grant Program for Hurricanes Idalia, Helene, and Milton funds, based on the specific need(s) of the respective community. The level and type of technical assistance to be provided will be determined by Pinellas County, based on the specific request submitted by the requesting party.

Additionally, technical assistance will be provided to groups representatives of persons of low- and moderate-income that request such assistance in developing proposals for funding assistance under any of the programs covered by the Action Plan. This assistance may take, but is not limited to, the following forms:

- Staff participation in committee meetings, including coordination of target area committees.
- Workshops for agencies proposing projects.
- One-on-one technical assistance provided in-person, over the phone, by email, at public meetings, or at scheduled and advertised public hearings. The level and type of assistance will be determined as needed on a case-by-case basis.
- Assistance with the establishment of neighborhood planning committees.

Pinellas County may provide other types of technical assistance as deemed appropriate.

XI. Jurisdiction Responsibility

The requirements for citizen participation do not restrict the responsibility or authority of Pinellas County for the development and execution of its CDBG-DR Action Plan.

XII. Citizen Participation Plan Contact

To connect with Pinellas County regarding CDBG-DR citizen participation efforts, please contact:

Email: cdplanning@pinellas.gov