

# MOBILE COUNTY ALABAMA CITIZEN PARTICIPATION PLAN ADDENDUM: COMMUNITY DEVELOPMENT BLOCK GRANT- DISASTER RECOVERY PROGRAM



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# Introduction

The Community Development Block Grant (CDBG) Program provides annual grants from the Department of Housing and Urban Development (HUD) on a formula basis to states, cities, and counties to develop viable urban communities by providing decent housing and a suitable living environment, and by expanding economic opportunities, principally for low- and moderate-income persons. On May 26, 2020, the Mobile County Commission (“the County”) executed an amendment to their comprehensive Citizen Participation Plan<sup>1</sup> (CPP) for the annual CDBG program. The Community Development Block Grant – Disaster Recovery (CDBG-DR) is a separate program administered by HUD with grant money allocated by Congress to recover from specific disasters. While much of the regulatory framework is the same for both CDBG and CDBG-DR, specific regulations and requirements for disaster recovery allocations require its own CPP. This document is an addendum to the CDBG CPP for the County and lists specific ways that the CDBG-DR grant will interact with the public differently. Unless otherwise specified, all parts of the County’s CPP apply to CDBG-DR and also apply to this document.

This addendum has been prepared pursuant to federal regulations (U.S. Department of Housing and Urban Development (HUD) Regulations 24 CFR Part 91.105). In preparing this document, the County aligned their procedures with the State’s guidance as referenced in the [State’s 2020 Citizen Participation Plan](#), CDBG-DR [Public Action Plan](#) for Hurricanes Sally (2020) and Hurricane Zeta (2020) and the Federal Register Notice ([87 FR 31636](#)). To ensure compliance and consistency, the County designed this addendum to provide the opportunity and encourage citizen participation in the Community Development Block Grant - Disaster Recovery (CDBG-DR) Program.<sup>2</sup>

Community participation is a critical component to the County’s present and future community disaster recovery from Hurricanes Sally and Zeta. When implementing a CDBG-DR Program, community input is imperative to the Programs success. The addendum’s objective is to give citizens the opportunity to communicate their needs to County leaders and stakeholders. The County will evaluate the community’s feedback during the planning and implementation phase of the CDBG-DR Program and apply that feedback where appropriate. Citizens are encouraged to participate in all phases of the CDBG-DR Program and will be provided full access and transparency to information. However, final responsibility and authority for the development and implementation of the CDBG-DR Program will remain with the County.

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<sup>1</sup> All applicable content of the Mobile County Citizen Participant Plan adopted May 26,2020 will remain active and utilized for the Community Development Block Grant - Disaster Recovery (CDBG-DR) Program.

<sup>2</sup> CDBG-DR Program may consist of housing and infrastructure programs and/or projects, as determined in the Local Recovery Plan (LRP).

## Scope of Participation

This addendum sets forth the policies and procedures for CDBG-DR Program participation designed to maximize citizen participation in the disaster recovery process. Emphasis will be placed on encouraging participation by persons of low- and moderate-incomes (LMI)<sup>3</sup>, residents of the Hardest Hit Most Impacted and Distressed (HHMID)<sup>4</sup> where CDBG-DR funds will be utilized, and targeted areas that were significantly impacted by Hurricanes Sally and Zeta. To maximize citizen participation of the targeted population, the County will collaborate with public agencies, public housing authorities (PHA) and advocates, neighborhood groups, faith-based and other community-based organizations representing low- and moderate-income residents, individuals with special needs, vulnerable populations, and non-English speaking populations in the impacted area.

The County will use the communication outreach platforms outlined in this addendum and other organizations in developing the CDBG-DR Unmet Needs Assessment (UNA), the Local Recovery Plan (LRP), and the design and implementation of activities. The County will encourage participation from broadband internet service providers, organizations engaged in narrowing the digital divide, agencies who manage flood prone areas, public land or water resources, and emergency management agencies<sup>5</sup>. The County will make reasonable efforts to provide the opportunity for citizen participation throughout the planning and implementation of the CDBG-DR Program. The County is committed to providing full transparency to its citizens during all phases of the Program including, but not limited to, the:

- Assessment of housing<sup>6</sup>, infrastructure, economic and mitigation unmet needs;
- Determination of CDBG-DR Program(s), project(s) and required documentation;
- Amendments to State awarded CDBG-DR projects; and,
- Program performance milestones.

## Citizen Participation Coordinator

The Director of Grants Management (or their designee) shall serve as the Citizen Participation Coordinator for all matters related to the Citizen Participation Plan. The Citizen Participation Coordinator may be contacted through the Mobile County Grants Department during regular business hours, weekdays from 8:00am to 5:00pm CST. Contact information is provided at <https://www.mobilecountyal.gov/cdbg-dr->

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<sup>3</sup> Low and moderate income (also referred to as LMI) is defined as family or household with an annual income less than the Section 8 Low Income Limit, generally does not exceed 80 percent of the area median income (AMI), adjusted for family size.

<sup>4</sup> Hardest Hit Most Impacted and Distressed (HHMID) City/County identified by the federal government. Mobile County has been designated as an HHMID.

<sup>5</sup> Additional information regarding outreach and translation can be found in the County's CPP, page 4.

<sup>6</sup> The Alabama Department of Economic and Community Affairs (ADECA) is the responsible entity for the [Home Recovery Alabama Program \(HRAP\)](#), the County will collaborate with ADECA on an as needed basis for this Program. The County has received CDBG-DR funding that will be allocated to address the affordable housing implementation.

[hurricanes-sally-and-zeta-1/](#) or staff can be reached at Mobile Government Plaza, South Tower, 8<sup>th</sup> Floor, 205 Government Street 36644.

The Citizen Participation Coordinator will serve as the contact person for all matters concerning citizen participation activities. This person shall be responsible for overseeing citizen participation throughout the CDBG-DR process and the implementation of all citizen participation activities and functions. The specific duties and responsibilities of the Citizen Participation Coordinator shall include, but are not limited to:

- Disseminating information concerning proposed CDBG-DR Programs, projects and the status of current activities;
- Outreach and coordinating with community groups in the CDBG-DR process with an emphasis on LMI individuals;
- Receiving and responding to written comments; serving as a vehicle by which ideas, comments, and proposals from the community may be transmitted to County staff and/or program staff; and,
- Monitoring the citizen participation process and proposing such amendments to the Citizen Participation Plan, as necessary.

## Public Engagement

The County serves as a Subrecipient to the State for both Hurricane Sally and Zeta CDBG-DR dollars, and a Subrecipient Agreement has been executed. The State, County, and other government entities serving as Subrecipients must complete an Unmet Needs Assessment (UNA) before deciding on how to allocate the funds provided. The allocation of funds will be written in the Local Recovery Plan (LRP), which like the UNA, will be posted to the County's website when complete. The County will work with the State and other local government entities to ensure that the Program decided upon is complimentary, and not overlapping. The Subrecipient Agreement currently ends on May 31, 2026 and may not be extended beyond May 18, 2028.

Public engagement meetings will be held to allow citizens the opportunity to provide public comment regarding the disaster recovery process. These engagement meetings will allow citizens the opportunity at different stages of the disaster recovery process to propose, review and comment on proposals concerning the development, implementation, and performance of CDBG-DR Program. County staff will respond to questions and comments from citizens at and/or following each public engagement. During these engagements, the County will provide informational material to the community to promote clear understanding and Program transparency.

As noted above, the County will conduct a UNA to define the community needs for long-term recovery. Following this assessment, the County will create an LRP. The community will be encouraged to participate by providing feedback on the LRP during two (2) public hearings, separate and in addition to the public engagement meetings. The County will provide notice to the community 14 days prior to the hearings. Guidance regarding County public hearings can be found in the CPP for the annual CDBG Program.<sup>7</sup>

Citizens may also express comments and views regarding the CDBG-DR Program and/or the community recovery process to the County at any regularly scheduled County Commission Meeting. For a complete list of County Commission meeting dates, times, and locations, go to the following website: <https://www.mobilecountyal.gov/government/meetings-agendas/>. The locations of the County Commission meetings are ADA accessible. Live and archived Mobile County Commission meetings can be viewed at <https://www.mobilecountyal.gov/government/livestreaming/>.

## Limited English Proficiency Residents

The County has prepared a HUD compliant [Four-Factor Analysis and Language Access Plan \(LAP\)](#), to determine the need to facilitate the participation of persons with limited English Proficiency. The County assessed the four (4) following factors when conducting the analysis:

- Number or proportion of LEP persons served or encountered in the eligible service population;
- The frequency with which the LEP persons come into contact with the program;
- The nature and importance of the program, activity, or service provided by the program;
- The resources available and costs to the recipient.

The County will evaluate their existing LAP and provide the necessary updates for determining which language assistance measures will need to be undertaken and/or updated to guarantee access to the CDBG-DR Program. Any amendments deemed necessary to the County's LAP will follow the guidance provided in the CPP for the annual CDBG Program.<sup>8</sup>

County staff will undertake all reasonable actions necessary to allow such persons to participate in the community disaster recovery process. Such actions may include, but are not limited to, the provision of an interpreter and/or the provision of materials in the appropriate language or format for persons with Limited English Proficiency. Tables 1 and 2 reflect the 2022 US Census Bureau's American Community Survey demographics. Further analysis will be undertaken as part of the UNA.

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<sup>7</sup> CPP - Section 5: Public Hearings & Related Comment Periods, page 8-13.

<sup>8</sup> CPP – Section 9: Amendments to the Citizen Participation Plan, page 16-17. Minor amendments (those incorporating HUD and State regulatory revisions or minor administrative changes) must also be approved by the Commission but are not subject to the 10-day public comment period.

Table 1: Mobile County 2022 Language Spoken at Home Data

County	English	Spanish	Asian and Pacific Islander	Other
<a href="#">Mobile</a>	95.8%	1.7%	1.4%	0.8%

Source: [United States Census Bureau – Table S1601- ACS Year 2022](#)

Table 2: Municipalities within Mobile County 2022 Language Spoken at Home Data

Municipalities	English	Spanish	Asian and Pacific Islander	Other
<a href="#">City of Bayou La Batre</a>	82.7%	0.3%	17.0%	0%
<a href="#">City of Chickasaw</a>	97.9%	1.2%	0.0%	0.1%
<a href="#">City of Citronelle</a>	98.8%	0.5%	0.7%	0.0%
<a href="#">City of Creola</a>	98.9%	0.6%	0.5%	0.0%
<a href="#">Town of Dauphin Island</a>	96.4%	3.2%	0.0%	0.0%
<a href="#">City of Mobile</a>	96.4%	1.6%	1.0%	0.4%
<a href="#">City of Saraland</a>	98.6%	0.1%	0.5%	0.3%
<a href="#">City of Satsuma</a>	98.1%	0.6%	1.0%	0.3%
<a href="#">City of Semmes</a>	97.1%	1.3%	1.4%	0.0%
<a href="#">City of Prichard</a>	99.4%	0.6%	0.0%	0.0%
<a href="#">Town of Mount Vernon</a>	97.2%	0.9%	0.0%	0.0%

Source: [United States Census Bureau – Table S1601- ACS Year 2022](#)

## Public Engagement Outreach

Notice of public engagements will be published on the County website no later than 10 days prior to the meeting date. In addition to the County’s website, a notice will be published in the local newspaper that is most accessible. The County will collaborate with local organizations, municipalities, and tribes throughout the community to conduct outreach efforts to the citizens they serve. All notices shall include the time, date, place, and topics of discussion.

The County will use established stakeholders and partnerships throughout the community to provide outreach to the targeted population. Partnerships include, but are not limited to:

- Local Municipalities and Tribes;
- Community Organizations;
- Educational Institutions;
- Public Assistance Agencies (such as SNAP, Medicaid, and/or WIC local offices);
- Community Centers; and

- Workforce Development Agencies.

## Public Engagement Meetings

Public meetings may be held as deemed necessary by the County to inform citizens of the CDBG-DR process, project(s), activities, and to solicit citizens' feedback. Prior to the drafting of the LRP, the County will host up to five (5) public engagement meetings, three (3) in-person and two (2) virtually. Throughout implementation of the CDBG-DR Program, the County will continue to host public engagement meetings and/or comment periods at critical milestones, such as Program development, Application for Funding development, and Program closeout.

Public engagement meetings will be held at times and locations that are ADA accessible, encourage LMI individual participation, and emphasize CDBG-DR potential project areas, as well as locations directly impacted by Hurricane Sally and Zeta. All public engagement meetings will comply with the requirements set forth in the State's CPP and this addendum to the County's existing CPP.

The public engagement meetings noted above are separate and in addition to the two (2) state required public hearings following the completion of the LRP.

## Accessibility to Persons with Disabilities

The locations of all public hearings and engagement meetings shall be made accessible to persons with disabilities. Also, the County shall provide reasonable accommodations whenever the Citizen Participation Coordinator is given advance notice of three (3) business days that one or more persons with mobility or developmental disabilities will be in attendance.

## Technical Assistance

The County Grants Department shall provide technical assistance to individual citizens and/or citizen groups upon request. Focus will be placed on those groups and representatives of persons of low- and moderate-income impacted by Hurricanes Sally and Zeta. Technical assistance shall also be utilized to foster public understanding of CDBG-DR Program requirements and will be provided on request and may include, but is not limited to:

- Provide information and/or materials concerning the CDBG-DR Program in formats accessible to the disabled, impaired or limited English-speaking populations;
- Interpret the CDBG-DR Program and its rules, regulations, procedures and/or requirements;
- Assist LMI individuals impacted by Hurricane Sally and Zeta in identifying unmet needs, and;
- Develop activities and proposals for projects which, when implemented, will address unmet disaster



recovery needs.

Technical assistance may be requested by contacting the Citizen Participation Coordinator as noted above.

## Recordkeeping and Retention

To facilitate citizen access to CDBG-DR Program information, the Citizen Participation Coordinator will keep all documents related to a CDBG-DR Program on file at the Mobile County Grants Department. Information from the project files shall be made available for examination and duplication, on request, during regular County business hours, weekdays from 8:00am to 5:00pm CST.

As a subrecipient of ADECA, all CDBG-DR Program information and materials must be available online during the life of the Program and all records must be retained for no less than five (5) years after grant close-out.

Program information materials will be available and distributed to the public at the regularly scheduled public engagement meetings as outlined in this addendum. Additionally, all Program related materials can be found on the County's CDBG-DR website: <https://www.mobilecountyal.gov/cdbg-dr-hurricanes-sally-and-zeta-1/>

. These documents include, but are not limited to:

- Public Engagement Meeting Recordings;
- Public Engagement Meeting Notes;
- Handouts and brochures from Public Engagement Meetings;
- Program Guides;
- Applicable Federal Register Notices;
- Quarterly Progress Reports; and
- Subrecipient Agreements.

## Procedures for Comments, Objectives and Complaints

Citizens are encouraged to submit their comments on all aspects of a CDBG-DR Program at the public engagement meetings or online through the County's website <https://www.mobilecountyal.gov/cdbg-dr-hurricanes-sally-and-zeta-1/>.

Citizens may, at any time, submit written comments or complaints to the County. Complaints should be submitted to the Citizen Participation Coordinator. Should, after a reasonable period, a party believe that his/her comment or complaint has not been properly addressed or considered, then the aggrieved may appeal his/her case to the County. County staff shall make every effort to provide written responses to citizen proposals or complaints within fifteen (15) business days of the receipt of such comments or

complaints where practical. The County's aim will be to always try to resolve complaints in a way that is sensitive to the complainant's concerns and achieves a fair result. Should the County be unable to sufficiently resolve an objection or complaint, it may be forwarded by the aggrieved party to the Alabama Department of Economic and Community Affairs (ADECA).

Citizens may, at any time, contact ADECA and/or HUD directly to register comments, objections or complaints concerning the County's CDBG-DR Program. Citizens are encouraged, however, to resolve any complaints at the County level as outlined above before contacting ADECA or HUD. All comments or complaints submitted to ADECA or HUD shall be addressed in writing to:

Alabama Department of Economic and Community Affairs  
Attention: CDBG-DR Program  
401 Adams Avenue, Suite 580  
Montgomery, Alabama 36103-5690

U.S. Department of Housing and Urban Development  
Attention: Community Planning and Development Division  
The Plaza, 417 20<sup>th</sup> Street N, Suite 700  
Birmingham, Alabama 35203

Records of all comments, objections and/or complaints by citizens concerning the County's CDBG-DR Program and subsequent action taken in response to those comments shall be maintained on file at the County's Grants Department and shall be made available for public inspection upon request. Complaint files will include the following:

- The name of the person who filed the complaint;
- The date the complaint was received;
- A description of the complaint;
- The name of each person contacted in relation to the complaint;
- A summary of the results of the review or investigation of the complaint; and
- An explanation of the resolution (e.g., the reason the file was closed).

## Addendums

It shall be the policy of the County to periodically review, discuss and amend the provisions outlined within this addendum. Updates to this addendum may be discussed at any CDBG-DR public engagement meeting and will be reflected in the publication. Addendums to the County's CPP shall be approved by resolution to the Mobile County Commission and shall be incorporated into the active Citizen Participation

Plan upon expiration of a 10-day public comment period (commencing on the date of publication).<sup>9</sup>

## Authority

No portion of this addendum shall be construed to restrict the responsibility and authority of the elected officials of the Mobile County Commission in the development, implementation, and execution of any Community Development Block Grant - Disaster Recovery Program.

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<sup>9</sup> Minor amendments (those incorporating HUD and State regulatory revisions or minor administrative changes) must also be approved by the Commission but are not subject to the 10-day public comment period.