

Section 1

City of Modesto Citizen Participation Plan For HUD Programs



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These policies supersede any previously adopted policies and are subject to review and revision by the City of Modesto's Citizens Housing and Community Development

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City of Modesto
Citizen Participation Plan

1. INTRODUCTION

- 1.1. The City of Modesto (City) is a federal entitlement jurisdiction that receives federal grant funding from the U.S. Department of Housing and Urban Development (HUD) for the following programs: Community Development Block Grants (CDBG), HOME Investment Partnerships Program (HOME) and Emergency Solutions Grants (ESG).
- 1.2. As a requirement for receiving the above named entitlement grants, the City is required to prepare the following documents:
 - 1.2.1. Consolidated Plan: A five year Consolidated Plan to identify local community development needs and set forth a funding strategy to address those needs.
 - 1.2.2. Annual Action Plan: An Annual Action Plan that summarizes the activities that will be undertaken in the upcoming Fiscal Year (FY) to address the needs outlined in the Consolidated Plan.
 - 1.2.3. Consolidated Annual Performance Evaluation Report (CAPER): A Performance Report that evaluates the progress during the fiscal year in carrying out the activities outlined in the Annual Action Plan.
 - 1.2.4. Assessment of Fair Housing: Identify local and regional fair housing issues and set goals for improving fair housing choice and access to opportunity. Assessment of Fair Housing uses the Assessment of Fair Housing tool to guide grantees through the identification process of fair housing issues and related contributing factors.
- 1.3. Under HUD’s Code of Federal Regulations for the Consolidated Plan (24 CFR Part 91 Sec.91.105), the City must adopt a Citizen Participation Plan that sets forth the City’s policies and procedures for citizen participation in the planning, execution, and evaluation of the Assessment of Fair Housing, Consolidated Plan, Annual Action Plan and CAPER. The guidelines established in this Citizen Participation Plan apply to the development and adoption of all of the above-listed documents (hereafter referred to as “the Plans”).

2. OBJECTIVE

- 2.1. The Citizen Participation Plan establishes standards to promote citizen participation in the development of the Plans and related documents. The Citizen Participation Plan is designed to especially encourage participation by low and moderate-income persons, including those living in blighted areas. As an entitlement jurisdiction for the respective HUD programs, the City is responsible for the implementation of the Citizen Participation Plan.

3. CITIZEN PARTICIPATION

3.1. The City provides for and encourages the participation of residents and stakeholders in the development of all the documents covered by the Citizen Participation Plan. The City further encourages participation by low- and moderate-income persons, particularly those living in blighted areas, in areas where HUD funds are proposed to be used and by residents of predominantly low- and moderate-income neighborhoods. The City encourages participation in all stages of the Consolidated Planning process by all residents, including minorities and non-English speaking persons, as well as persons with mobility, visual, or hearing impairments, and residents of assisted housing developments and recipients of tenant-based assistance.

4. CONSULTATION REQUIREMENTS (24 CFR 91.100)

- 4.1. In the development of the Plans, the City will consult other public and private agencies and public organizations including but not limited to those providing:
- 4.1.1. Assisted housing;
 - 4.1.2. Health services; and
 - 4.1.3. Social services and fair housing services (including those focusing on services to children, elderly persons, persons with disabilities, persons with HIV/AIDS and their families, homeless persons, economic development, neighborhood development and other housing and community development services).
- 4.2. When preparing the section of the Plans describing the City's homeless strategy and the resources to address the needs of homeless persons (particularly chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth) and persons at risk of homelessness, the City will consult with:
- 4.2.1. The local Continuum of Care;
 - 4.2.2. Public and private agencies that address housing, health, social service, victim services, employment, or education needs of low-income individuals and families ; homeless individuals and families, including homeless veterans; youth; and/or other persons with special needs;
 - 4.2.3. Publicly funded institutions and systems of care that may discharge persons into homelessness (such as health-care facilities, mental health facilities, foster care and other youth facilities, and corrections programs and institutions); and
 - 4.2.4. Business and civic leaders.
- 4.3. When preparing the portion of the Plans concerning lead-based paint hazards, the City will consult with State or local 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.

- 4.4. When preparing the description of priority non-housing community development needs, the City of Modesto will notify adjacent units of general local government, to the extent practical.
- 4.5. The City of Modesto will consult with adjacent units of general local government, such as adjacent HUD entitlement jurisdictions and local government agencies with metropolitan-wide planning responsibilities, particularly for problems and solutions that go beyond the City's jurisdiction.
- 4.6. The City of Modesto will consult with the Housing Authority of the County of Stanislaus (HACS), the local public housing agency (PHA), concerning consideration of public housing needs, planned programs and activities, the Assessment of Fair Housing, strategies for affirmatively furthering fair housing, and proposed actions to affirmatively further fair housing in the consolidated plan.
- 4.7. The City will consult with community based and regionally based organizations that represent protected class members, and organizations that enforce fair housing laws, such as State or local fair housing enforcement agencies, fair housing organizations and other nonprofit organizations that receive funding under the Fair Housing Initiative Program (FHIP), and other public and private fair housing service agencies operating within the City. Consultation will occur, at a minimum, during the fair housing planning process, in the development of the Assessment of Fair Housing and the Consolidated Plan. Consultation on the Consolidated Plan will specifically seek input into how the goals identified in the accepted Assessment of Fair Housing informed the priorities and objectives of the Consolidated Plan.
- 4.8. As a recipient of ESG funds, the City will consult with the Continuum of Care in determining how to allocate its ESG funds toward eligible activities; in developing the performance standards for, and evaluating the outcomes of, projects and activities assisted by ESG funds; and in developing funding, policies, and procedures for the operation and administration of the Homeless Management Information System (HMIS).
- 4.9. In addition, in accordance to the ESG Final Rule requirements, the City will consult with the following entities in the planning for ESG related activities:
 - 4.9.1. Public and private agencies that address housing, health, social service, victim services, employment, or education needs of low-income individuals and families;
 - 4.9.2. Homeless individuals and families, including homeless veterans; youth; and/or other persons with special needs;
 - 4.9.3. Publicly funded institutions and systems of care that may discharge persons into homelessness (such as health-care facilities, mental health facilities, foster care and other youth facilities, and corrections programs and institutions); and

4.9.4. Business and civic leaders.

4.10. A variety of mechanisms may be utilized to solicit input from the persons/service providers/agencies listed above. These include posting and/or mailing notices of public meetings and hearings, telephone or personal interviews, mail surveys, internet-based feedback and consultation workshops

5. AVAILABILITY OF DRAFT AND APPROVED DOCUMENTS

5.1. When developing the Consolidated Plan and the Assessment to Fair Housing, the following criteria will apply:

5.1.1. As soon as feasible after the start of the public participation process, the HUD provided data and any other supplemental information to be incorporated into the Assessment of Fair Housing will be made available to the residents, public agencies, and any other interested parties.

5.1.2. The City of Modesto may make the HUD provided data available to the public by cross-referencing the data on HUD's website.

5.2. The draft versions of Consolidated Plans and Annual Action Plans will make available to residents, public agencies, and other interested parties information that includes the estimated amount the City expects to receive (including grant funds and program income) and the range of activities that may be undertaken, including the estimated amount that will benefit persons of low and moderate income.

5.3. The draft and final versions Consolidated Plans, Annual Action Plans, CAPERs, Assessments of Fair Housing, and Citizen Participation Plans, and all related amendments, will be made available for public review online at the City of Modesto Housing and Urban Development Publications and Reports website: <https://www.modestogov.com/1848/Publications-Reports>. Public review periods will vary as outlined in Section 7.4, below.

5.4. Hard copies of the documents will be available at the City of Modesto, Community Development Division, 1010 10th Street, Suite 3100, 3rd Floor, Modesto, California, 95354.

5.5. Written comments will be accepted by the Community Development Manager, or designee, during public review periods. A summary of the comments received, written and verbal, will be attached to the final Consolidated Plans, Annual Action Plans, Substantial Amendments, approved CAPERs, or draft Assessments of Fair Housing prior to submission to HUD. Copies will be made available following the process described in Section 7.4 of this document.

6. AMENDMENTS

6.1. Amendments will be necessary whenever any of the criteria under each Plan listed below is proposed. Substantial amendments to any of the Plans will be subject to Citizen Participation Plan requirements.

6.2. Consolidated Plan Amendment Considerations

- 6.2.1. A “substantial change” to a Consolidated Plan is defined as an addition or deletion of Consolidated Plan priorities or goals.
- 6.2.2. All other changes may be handled administratively and are not subject to the public hearing requirements of this Citizen Participation Plan; however, public outreach and City Council approval will be conducted as required by City practice.

6.3. Citizen’s Participation Plan Amendment Considerations

- 6.3.1. A “substantial change” to a Citizen’s Participation Plan is defined as an addition or deletion of Citizen’s Participation Plan priorities or goals.
- 6.3.2. All other changes may be handled administratively and are not subject to the public hearing requirements of this Citizen Participation Plan.

6.4. Annual Action Plan Amendment Considerations

- 6.4.1. A “substantial change” to an Annual Action Plan is defined as:
 - 6.4.1.1. Addition of a new activity not previously identified in the Annual Action Plan;
 - 6.4.1.2. Deletion or cancelation of an activity identified in the Annual Action Plan which has NOT been deemed ineligible or determined to be infeasible (provided any allocated funds are transferred to another approved activity as part of a subsequent Annual Action Plan approval); and
 - 6.4.1.3. The addition of new CDBG Public Service or ESG award grantees.
- 6.4.2. All other changes may be handled administratively and are not subject to the public hearing requirements of this Citizen Participation Plan; however, public outreach and City Council approval will be conducted as required by City practice. The following changes are considered administrative:
 - 6.4.2.1. Proportional adjustment to CDBG Public Service and ESG award amounts to accommodate actual HUD allocations amounts (provided new sub-recipients are not awarded funds);
 - 6.4.2.2. Reallocation of funds, not exceeding an amount of \$100,000 between activities approved in the current or prior Annual Action Plan; and
 - 6.4.2.3. Reallocation of fund balance, in any amount, from a completed activity to another approved activity.
- 6.4.3. In any case where the reallocation of funds occurs, the reallocation will be reported accordingly in the respective fiscal year CAPER.

6.5. Assessment of Fair Housing

- 6.5.1. A “substantial change” to an Assessment of Fair Housing is defined as:
 - 6.5.1.1. A material change occurs. A material change shall be a change in circumstances within the City that affects the

information on which the Assessment of Fair Housing is based to the extent that the analysis, the fair housing contributing factors, or the priorities and goals of the Assessment of Fair Housing no longer reflect actual circumstances. Examples include, but are not limited to:

- 6.5.1.1.1. A Presidentially declared disaster within the City of Modesto that is of such nature as to significantly impact the steps the City may need to take to affirmatively further fair housing;
 - 6.5.1.1.2. Significant demographic changes;
 - 6.5.1.1.3. New significant contributing factors within the City of Modesto; and
 - 6.5.1.1.4. Civil rights findings, determinations, settlements, or court orders.
- 6.5.1.2. HUD's written notification specifying a material change that requires revision.

7. PUBLIC HEARINGS, NOTIFICATION AND ACCESS

7.1. The City will follow the following procedure in conducting public hearings and providing notification and access to all Consolidated Plan documents discussed in this Citizen Participation Plan:

7.2. Public Hearing Process

7.2.1. The City will conduct at least two public hearings per year to obtain citizens' views and comments on planning documents during the public review and comment period. These meetings will be conducted at different times of the program year and together will cover the following topics:

- 7.2.1.1. Housing and Community Development Needs
- 7.2.1.2. Development of Proposed Activities
- 7.2.1.3. Review of Program Performance

7.2.2. At least one public hearing before the Citizens' Housing and Community Development Committee (CHCDC) prior to the publication of the draft documents will be held to obtain the views and input of citizens, public agencies, and other interested parties. The City, at its discretion, may conduct additional outreach, public meetings or public hearings as necessary to foster citizen access and engagement.

7.3. Public Hearing Notification

7.3.1. Notices will be printed/posted at least 14 days prior to the meeting date. Noticing may include:

- 7.3.1.1. Printing a public notice in newspaper(s) of general circulation in the City;
- 7.3.1.2. Display ads and/or press releases; and/or
- 7.3.1.3. Posting notices at City Hall.

7.3.2. Notices will include information on the subject and topic of the meeting including summaries when possible and appropriate to properly inform the public of the meeting. Notices may be published in additional languages as appropriate and will be accessible to those with disabilities. Meeting location and access is described below.

7.4. Public Review/Comment Period

7.4.1. Public notices will be printed / posted prior to the commencement of any public review/comment period alerting citizens of the documents for review. The minimum public comment/review period for each Consolidated Plan document is listed below:

Document	Public Comment Period
Consolidated Plan	30 days
Action Plan	30 days
Substantial Amendments	30 days
CAPER	15 days
Assessment of Fair Housing	30 days
Citizen Participation Plan	30 days

7.4.2. Copies of all documents and notices will be available for public review at the following location:

City of Modesto
 Community and Economic Development Department
 1010 10th Street, Suite 3100
 Modesto, California, 95354

7.4.3. Documents and notices will also be posted to the City of Modesto website at: <https://www.modestogov.com/1848/Publications-Reports>

7.5. Access to Meetings

7.5.1. Unless otherwise noted, Public Hearings requiring City Council action will be conducted at City Council meetings located at 1010 10th Street, Lower Level (Basement), Modesto, California, 95354. For public meetings not requiring City Council participation, the City will make every effort to conduct such meetings at a location within the low- and moderate-income target areas accessible and convenient to potential and actual beneficiaries. The City will work with neighborhood groups and other stakeholders for guidance in selecting meeting locations and times.

7.5.2. It is the intent of the City to comply with the Americans with Disabilities Act (ADA) and Title VI of the Civil Rights Act of 1965 and related statutes in all respects. If an attendee or participant at a public hearing and/or meeting needs special assistance beyond what is normally provided, the

City will attempt to accommodate these people in every reasonable manner.

7.6. Access to Records

7.6.1. Approved Plan documents will be kept on file by the City at the Community and Economic Development Department, 1010 10th Street, Suite 3100, Modesto, California, 95354 and online at : <https://www.modestogov.com/1848/Publications-Reports>. Copies of the Plans can be made available to those requesting the Plans.

7.6.2. The City will ensure timely and reasonable access to information and records related to the development of the Plans and related documents, and the use of HUD funds from the preceding five (5) years.

7.6.3. Requests for information and records must be made to the City in writing. Staff will respond to such requests within fifteen (15) working days or as soon as possible thereafter.

7.7. Technical Assistance

7.7.1. The City will provide technical assistance, particularly to groups or individuals representing persons with very low or low incomes. Said assistance shall be used to develop funding proposals for assistance under any of the formula programs covered by the Consolidated Plan. City staff shall determine the necessary level and degree of assistance. Such technical assistance might include, but is not limited to, the following:

- 7.7.1.1. Assisting with forms/applications;
- 7.7.1.2. Explaining the process for submitting proposals;
- 7.7.1.3. Explaining federal and local requirements;
- 7.7.1.4. Providing comments and advice on the telephone or in meetings; and/or
- 7.7.1.5. Reviewing and commenting on draft proposals.

7.8. Comments and Complaints

7.8.1. Written and verbal comments received at public hearings, public meetings, or during the comment period will be summarized and considered in the development of the Plans and related documents subject to this Citizen Participation Plan, and included as an attachment to final Plans and related documents submitted to HUD. Written comments are strongly encouraged and should be addressed to:

City of Modesto
Community and Economic Development Department
Attn: Community Development Manager
1010 10th Street, Suite 3100
Modesto, California, 95354

- 7.8.2. A complaint regarding any the Plans and related documents covered by this Citizen Participation Plan must be submitted in writing to the Community Development Manager.
- 7.8.3. The City will accept written complaints provided they specify:
 - 7.8.3.1. The description of the objection, and supporting facts and data; and
 - 7.8.3.2. Provide name, address, and telephone number of complainant and date of complaint.
- 7.8.4. Pursuant to the Code of Federal Regulations (Section 24, CFR 91.105 (j)), a written response will be made to all written complaints within fifteen (15) working days, acknowledging the letter and identifying a plan of action, if necessary.

7.9. Individuals with Limited English Proficiency

- 7.9.1. In compliance with Title VI of the Civil Rights Act of 1964, the City will take responsible steps to ensure meaningful access to benefits, services, information, and other important aspects of the programs covered by the Plans and related documents for individuals with Limited English Proficiency. If an individual or participant with Limited English Proficiency needs assistance beyond what is normally provided, the City will attempt to accommodate their request in every reasonable manner.
- 7.9.2. If anyone needs any information related to the Plans and related documents in an alternate format, please contact the City of Modesto ADA Title II/Civil Rights Title VI Coordinator at (209) 577-5282.

8. ANTI-DISPLACEMENT AND RELOCATION POLICY AND PLAN

8.1. Anti-Displacement Policy

- 8.1.1. The City seeks to minimize, to the greatest extent feasible, the involuntary displacement, whether permanently or temporarily, of persons (families, individuals, businesses, nonprofit organizations, or farms) from projects funded with CDBG, ESG, or HOME involving single or multi-family rehabilitation, acquisition, commercial rehabilitation, demolition, economic development, or capital improvement activities.
- 8.1.2. Projects that the City deems beneficial but that may cause displacement may be recommended and approved for funding only if the City of Modesto demonstrates that such displacement is necessary and vital to the project and that they take efforts to reduce the number of persons displaced. Further, it must be clearly demonstrated that the goals and anticipated accomplishments of a project outweigh the adverse effects of displacement imposed on persons who must relocate.

8.1.3. This section describes the City’s Anti-displacement and Relocation Plan and how it will assist persons who will be temporarily relocated or permanently displaced due to the use of HUD funds. This plan takes effect whenever the City sponsors projects using CDGB, ESG, or HOME funds that involve the following:

8.1.3.1. Property acquisition; or

8.1.3.2. The demolition or conversion of low- and moderate-income dwelling units.

8.2. Background

8.2.1. Two acts apply whenever any of the above issues are present:

8.2.1.1. The Uniform Relocation Assistance and Real Property Policies Act of 1970 (URA); and

8.2.1.2. Section 104(d) of the Housing and Community Development Act of 1974.

8.2.2. Each of these acts place different obligations on the City.

8.2.3. The URA governs the processes and procedures which the City must follow to minimize the burden placed on low- and moderate-income tenants, property owners, and business owners who must move (either temporarily or permanently) as the result of a project funded in whole or in part by the CDBG, ESG, or HOME programs. The URA applies to:

8.2.3.1. Displacement that results from acquisition, demolition, or rehabilitation for HUD-assisted projects carried out by public agencies, nonprofit organizations, private developers, or others;

8.2.3.2. Real property acquisition for HUD-assisted projects (whether publicly or privately undertaken);

8.2.3.3. Creation of a permanent easement or right of way for HUD-assisted projects (whether publicly or privately undertaken); and

8.2.3.4. Work on private property during the construction of a HUD-assisted project even if the activity is temporary.

8.3. What is Displacement?

8.3.1. Displacement occurs when a person moves as a direct result of federally assisted acquisition, demolition, conversion, or rehabilitation activities¹, because he or she is:

8.3.1.1. Required to move; or

8.3.1.2. Not offered a decent, safe, sanitary and affordable unit in the project;

8.3.1.3. Treated “unreasonably” as part of a permanent or temporary

¹ Persons who voluntary participate in a CDBG, ESG, or HOME funded rehabilitation activity may only qualify for relocation assistance when no other housing options are available to them.

move.

8.3.2. A person may also be considered displaced if the necessary notices are not given or provided in a timely manner and the person moves for any reason.

8.4. What is a Displaced Person?

8.4.1. The term displaced person means any person that moves from real property or moves his or her personal property from real property permanently as a direct result of one or more of the following activities:

8.4.1.1. Acquisition of real property, in whole or in part, for a project;

8.4.1.2. Rehabilitation or demolition of real property for a project;

8.4.2. The City may offer advisory and financial assistance to eligible tenants (or homeowners) who meet the above definition.

8.5. Persons Not Eligible for Assistance

8.5.1. A person is not eligible for relocation assistance under the provisions of the URA if any of the following occurs:

8.5.1.1. The person was evicted for serious or repeated violation of the terms and conditions of the lease or occupancy agreement, violation of applicable Federal, State, or local law, or other good cause. However, if the person was evicted only to avoid the application of URA, then that person is considered displaced and is eligible for assistance;

8.5.1.2. The person has no legal right to occupy the property under State or local law;

8.5.1.3. The City determines that the person occupied the property to obtain relocation assistance and the HUD Field Office concurs in that determination;

8.5.1.4. The person is a tenant-occupant that moved into the property after a certain date, specified in the applicable program regulation, and, before leasing and occupying the property, the City provided the tenant-occupant written notice of the application for assistance, the project's impact on the person, and the fact that he or she would not qualify as a "displaced person" because of the project;

8.5.1.5. The person is a tenant-occupant of a substandard dwelling that is acquired or a tenant-occupant of a dwelling unit to which emergency repairs are undertaken and the HUD field office concurs that:

8.5.1.5.1. Such repairs or acquisition will benefit the tenant;

8.5.1.5.2. Bringing the unit up to a safe, decent, and sanitary condition is not feasible;

8.5.1.5.3. The tenant's new rent and average estimated monthly utility costs will not exceed the greater of:

the old rent/utility costs or 30 percent of gross household income; and

- 8.5.1.5.4. The project will not impose any unreasonable change in the character or use of the property.
- 8.5.1.6. The person is an owner-occupant of the property who moves because of an arm's length acquisition;
- 8.5.1.7. The City notifies the person that they will not displace him or her for the project;
- 8.5.1.8. The person retains the right of use and occupancy of the real property following the acquisition; or
- 8.5.1.9. The City determines that the person is not displaced as a direct result of the acquisition, rehabilitation, or demolition for the project and the HUD field office concurs in the determination.

8.6. Minimizing Displacement

- 8.6.1. The City will take reasonable steps to minimize displacement occurring as a result of its CDBG, ESG, and HOME activities. This means that the City will:
 - 8.6.1.1. Consider if displacement will occur as part of funding decisions and project feasibility determinations;
 - 8.6.1.2. Assure, whenever possible that occupants of buildings to be rehabilitated are offered an opportunity to return;
 - 8.6.1.3. Plan substantial rehabilitation projects in "stages" to minimize displacement; and
 - 8.6.1.4. Meet all HUD notification requirements so that affected persons do not move because they have not been informed about project plans and their rights.

8.7. Displacement Assistance

- 8.7.1. Consistent with the goals and objectives of the CDBG, ESG, and HOME programs, the City will take all reasonable steps necessary to minimize displacement of persons, even temporarily. If displacement occurs, the City will provide relocation assistance to all persons directly, involuntarily, and permanently displaced according to HUD regulations.
- 8.7.2. If the City temporarily displaces a low- or moderate-income household, that household becomes eligible for certain relocation payments. The assistance applies to those persons residing in the residence at the time the application is processed and is based on the following procedures:
 - 8.7.2.1. If the structure and its occupants are determined eligible for temporary relocation assistance, the owner-occupants and/or tenants are eligible for the actual reasonable cost (based on fair market rent) of temporary lodging facilities until the structure is determined habitable by a housing or building inspector authorized by the City to make the determination;
 - 8.7.2.2. The City must approve housing and the Lessor and Lessee

must sign a rent agreement before move-in. Housing must be comparable functionally to the displacement dwelling and decent, safe, and sanitary. This does not mean that the housing must be in comparable size. The term “functionally equivalent” means that it performs the same function, has the same principal features present, and can contribute to a comparable style of living. Approved lodging accommodations include apartments and houses. The City of Modesto does not reimburse “rental expenses” for living with a friend or family member;

- 8.7.2.3. The City may facilitate moving and storage of furniture with a moving company;
- 8.7.2.4. Damage deposits, utility hookups, telephone hookups and insurance costs are not eligible for reimbursement; and
- 8.7.2.5. The City may pay the cost of relocation assistance from available Federal funds.

8.8. One-For-One Replacement Dwelling Units

- 8.8.1. The City will generally avoid awarding funds for activities resulting in displacement. However, should the City fund an activity, specific documentation is required to show the replacement of all occupied and vacant dwelling units demolished or converted to another use. The following exception applies to the demolition of units:
 - 8.8.1.1. Vacant blighted dwelling units that have been determined by the City to be unsafe for human occupancy and subsequently demolished using federal funds shall not require replacement.
- 8.8.2. Should the City fund an activity resulting in displacement, the City will assure that relocation assistance is provided as described in 24 CFR 570.606(b)(2).
- 8.8.3. Consistent with the goals and objectives of the CDBG, ESG, and HOME programs, the City will take all reasonable steps necessary to minimize displacement of persons from their homes. The City will avoid funding projects that cause displacement of persons or businesses and will avoid funding any project that involves the conversion of low- and moderate-income housing to non-residential purposes.