

## **CDBG AND HOME CITIZEN PARTICIPATION PLAN**

### **1. Overview**

The City of Vancouver receives federal Community Development Block Grant (CDBG) and HOME Investment Partnerships Program (HOME) grant funds annually from the U.S. Department of Housing & Urban Development (HUD). Each grant has different regulations, program requirements, and target populations. The two grants are awarded based on a formula that takes into account the population, the demographics of persons living in poverty, the level of overcrowded housing, and the age of housing.

The 5 Year Consolidated Plan for Housing and Community Development (Consolidated Plan) is intended to establish a unified vision of housing and community development strategies for the two federal grants received by the City. The plan is also designed to assist the community in providing decent housing, suitable living environments, and expanding economic opportunities for low-income or disabled persons.

### **2. Final Policy/Implementation Authority**

The Citizen Participation Plan recognizes that the Vancouver City Council, as the elected governing body for the City of Vancouver, has the ultimate responsibility and authority for the adoption and implementation of the Consolidated Plan and CDBG and HOME activities. The City of Vancouver conducts a minimum of two public hearings per year. The Consolidated Plan / Action plan hearing is conducted the spring and the Consolidated Annual Performance Evaluation Report (CAPER) is conducted in the fall. City Council will be apprised of any plan amendments made during the year at the appropriate hearing.

### **3. Citizen Participation**

The City shall follow a detailed citizen participation plan that addresses the following issues:

- access to information
- access to meetings
- access to records
- amendments to plans
- complaints
- emergency / disaster policies
- minimizing displacement
- notice of hearings
- participation opportunities
- public comment opportunities
- public hearings
- publishing plans
- technical assistance

- a) **Encouragement of Citizen Participation in CDBG/HOME Planning & Activities:** All citizens, including low- and moderate-income persons, persons living in low- and moderate-income neighborhoods, minority populations, non-English speaking persons, persons with disabilities, homeless persons/agencies and residents of public and assisted housing developments are encouraged to participate in the development and review of the:

- Citizen Participation Plan and amendments
- Consolidated Plan
- Assessment of Fair Housing
- Annual Action Plan
- Consolidated Annual Performance and Evaluation Report (CAPER)
- Substantial Amendments to the Assessment of Fair Housing, Action Plan and Consolidated Plan

All meetings are open to the public with efforts made to be scheduled at times and locations convenient to potential and actual beneficiaries with accommodations for persons with disabilities and assistance available for non-English speaking persons. Those wishing to be regularly informed of meetings/activities can be added to the program mailing and e-mail notification lists.

- b) **Public Review and Comment on the Adoption of or Amendments to the Citizen Participation Plan:**

Amendments to the Citizen Participation plan shall be processed similar to a substantial amendment as noted in Section 12. Prior to submitting an amended Citizen Participation Plan to HUD, the City will publish a 15-day notice in *The Columbian* newspaper and online at [www.cityofvancouver.us/CDBG](http://www.cityofvancouver.us/CDBG) advising citizens of an opportunity to comment on any proposed amendment.

- **Public Notice Requirement & Comment Period:** A notice of a proposed amendment to the Citizen Participation Plan is advertised in *The Columbian* newspaper allowing the public a 15-day comment period and listing the amendment.
- **Public Review:** During the 15-day public comment period, copies of the proposed plans will be available for review at the Vancouver City Hall (415 W 6th Street), online at [www.cityofvancouver.us/CDBG](http://www.cityofvancouver.us/CDBG), web links available through City social media formats, and where possible at public library branches within Vancouver. A reasonable number of free copies of the plans are available upon request to citizens and groups. Reasonable accommodations will be made for non-English speaking persons and for people with disabilities. For details contact the Programs Manager, CDBG/HOME Program, City of Vancouver, PO Box 1995, Vancouver, WA 98668-1995, voice (360) 487-7952 | TTY: (360) 487-8602 | WA Relay: 711.

- **Public Comments:** The public may comment on proposed amendments during the 15-day public comment period. A summary of all comments will be considered and attached to the plan. Written comments must be directed to the Programs Manager, CDBG/HOME Program, City of Vancouver, PO Box 1995, Vancouver, WA 98668-1995.

#### 4. **Public Meeting Notice and the Corresponding Public Comment Period Requirements**

Notices of public meetings, public hearings, substantial amendments, notifications of 15 or 30-day comment periods, and the notification of the City of Vancouver's proposed and actual use of CDBG/HOME funds will be published in *The Columbian* and posted online at [www.cityofvancouver.us/CDBG](http://www.cityofvancouver.us/CDBG).

To further encourage the attendance and participation of persons of low- and moderate-income, notices will also be sent to:

- the Vancouver Housing Authority
- the Coalition of Service Providers (COC)
- public and private agencies that provide housing, health, and social services
- public and private agencies that represent minorities and non-English speaking persons residing in the City of Vancouver
- other organizations including businesses, developers, nonprofit organizations, philanthropic organizations, and community-based and faith-based organizations
- Interested parties on the City of Vancouver CDBG/HOME mailing list
- Social media sources including the City Facebook page and Twitter account

#### 5. **Access to Records**

The City of Vancouver shall provide citizens, public agencies, and other interested parties with reasonable and timely access to information and records relating to the Consolidated Plan and the City's allocation of funding through the CDBG/HOME Programs.

Copies of the adopted plans and performance reports, as well as information regarding use of funds and other program information will be maintained by the City's CDBG/HOME program staff.

copies of the proposed plans will be available for review at the Vancouver City Hall (415 W 6th Street), online at [www.cityofvancouver.us/CDBG](http://www.cityofvancouver.us/CDBG), web links available through City social media formats, and where possible at public library branches within Vancouver. A reasonable number of free copies of the plans are available upon request to citizens and groups. Reasonable accommodations will be made for non-English speaking persons and for people with disabilities. For details contact the Programs Manager, CDBG/HOME Program, City of Vancouver, PO Box 1995, Vancouver, WA 98668-1995, voice (360) 487-7952 | TTY: (360) 487-8602 | WA Relay: 711.

6. **5 Year Consolidated Plan for Housing and Community Development, Assessment of Fair Housing and the Annual Action Plan:**

- a) **Consolidated Plan:** Every five years the City of Vancouver develops a Consolidated Plan. The function of this plan is to provide an analysis of community needs and establish objectives and strategies to guide the allocation of federal housing and community development funding over that five year period. The plan is developed through a community planning process with the involvement of community stakeholders and agencies. The plan proposes strategies to implement HUD objectives, while focusing on the priorities of the City.
- b) **Annual Action Plan:** Provides annual updates to the specific level of funding available and the proposed uses of the funds. A public application review process prioritizes funding projects. The Annual Action Plan is subsequently approved by City Council and submitted to HUD for approval each year.
- c) **Assessment of Fair Housing:** The Assessment of Fair Housing is an analysis of fair housing issues and contributing factors in a program participant's jurisdiction related to fair housing practices. The AFH is a tool to help programs take meaningful actions to overcome systemic segregation, promote fair housing choice, and foster inclusive communities that are free from discrimination. Based on the results of local research data programs must generate goals to guide program participants during the subsequent planning cycle.
- d) **Public Hearing & Comment Period:** The City of Vancouver provides a public review process that affords citizens, public agencies, and other interested parties an opportunity to examine the proposed Assessment of Fair Housing, Action Plan, and Consolidated Plan and to submit comments regarding the proposed Action/Consolidated Plan.
  - **Public Notice Requirement & Comment Period:** A Public Hearing for the adoption of or amendment to the Assessment of Fair Housing, Action Plan, Consolidated Plan shall be published in *The Columbian* newspaper and online at [www.cityofvancouver.us/CDBG](http://www.cityofvancouver.us/CDBG) at least 30 days before the date of the hearing. The notice shall include:
    - i. Anticipated amount of assistance (including grants funds and program income)
    - ii. Range of activities that may be undertaken
    - iii. Estimated amount that will benefit low- and moderate income persons
    - iv. Summary of the contents and purpose of the Action/Consolidated Plan
    - v. List of the locations where copies of the entire proposed plan may be examined.

- **Public Review:** During the 30-day public comment period, copies of the proposed plans will be available for review at the Vancouver City Hall (415 W 6th Street), online at [www.cityofvancouver.us/CDBG](http://www.cityofvancouver.us/CDBG), web links available through City social media formats, and where possible at public library branches within Vancouver. A reasonable number of free copies of the plans are available upon request to citizens and groups. Reasonable accommodations will be made for non-English speaking persons and for people with disabilities. For details contact the Programs Manager, CDBG/HOME Program, City of Vancouver, PO Box 1995, Vancouver, WA 98668-1995, voice (360) 487-7952 | TTY: (360) 487-8602 | WA Relay: 711.
- **Public Comments:** The public may comment on the proposed plans in writing during the 30-day public comment period or at the public hearing. A summary of all comments will be considered and attached to the final plan. Written comments must be directed to the Programs Manager, CDBG/HOME Program, City of Vancouver, P.O. Box 1995, Vancouver, WA 98668-1995.
- **Public Hearing Location:** Hearings shall be held in Council Chambers, Second Floor, Vancouver City Hall, 415 W 6th Street, in Vancouver, WA unless otherwise specified.

## 7. Consolidated Annual Performance Evaluation Review (CAPER)

This report analyzes progress towards the goals established in the Consolidated Plan and implemented through the Annual Action Plan. The report also provides information on the performance of funded projects in relationship to HUD and local program objectives. A public hearing is typically scheduled in September to present program accomplishments to City Council and receive public comment.

- **Public Notice Requirement & Comment Period:** A Public Hearing for the adoption of the CAPER will be published in *The Columbian* newspaper and online at [www.cityofvancouver.us/CDBG](http://www.cityofvancouver.us/CDBG) at least 15 days before the date of the hearing. The public hearing notice shall include a list of the locations where copies of the report may be viewed.
- **Public Review:** During the 15-day public comment period, copies of the proposed plans will be available for review at the Vancouver City Hall (415 W 6th Street), online at [www.cityofvancouver.us/CDBG](http://www.cityofvancouver.us/CDBG), web links available through City social media formats, and where possible at public library branches within Vancouver. A reasonable number of free copies of the plans are available upon request to citizens and groups. Reasonable accommodations will be made for non-English speaking persons and for people with disabilities. For details contact the Programs Manager, CDBG/HOME Program, City of Vancouver, PO Box 1995, Vancouver, WA 98668-1995, voice (360) 487-7952 | TTY: (360) 487-8602 | WA Relay: 711.

- **Public Comments:** The public may comment on the draft CAPER in writing during the 15-day public comment period or at the public hearing. A summary of all comments will be considered and attached to the final plan. Written comments must be directed to the Programs Manager, CDBG/HOME Program, City of Vancouver, PO Box 1995, Vancouver, WA 98668-1995.
- **Public Hearing Location:** Hearings shall be held in Council Chambers, Second Floor, Vancouver City Hall, 415 W 6th Street, in Vancouver, WA. unless otherwise specified.

#### 8. **Non-English Speaking and Handicapped Residents Accommodation**

All public meetings, workshops, and hearings are held in facilities that are accessible to people with disabilities. Upon reasonable request, the City will provide translators at public hearings and meetings. Furthermore, meeting notices will be sent to organizations representing non-English speaking residents of the city.

To request another format, language or accommodation, please contact the Programs Manager, CDBG/HOME Program, City of Vancouver, PO Box 1995, Vancouver, WA 98668-1995, voice (360) 487-7952 | TTY: (360) 487-8602 | WA Relay: 711 at least two days prior to the meeting or hearing.

#### 9. **Technical Assistance**

The City will provide technical assistance to groups representing low- and moderate-income persons that request such assistance to develop an application for CDBG/HOME funding through the City. Such technical assistance may include an explanation of:

- Program rules and regulations
- Requirements for implementing and managing projects
- Project eligibility and national objectives requirements

#### 10. **Procedures for Complaints or Grievances**

Complaints, inquiries, and grievances shall be submitted in writing to the Programs Manager, CDBG/HOME Program, City of Vancouver, PO Box 1995, Vancouver, WA 98668-1995. A written response shall be provided to the complaining or aggrieved party within 15 working days of the date of receipt of the written complaint or grievance.

## 11. Program Year Schedule

July	Start of program year
September	Public meeting to review goals, objectives and needs in the Consolidated Plan (15-day comment period prior to meeting)
September 3 <sup>rd</sup> or 4 <sup>th</sup> week	Public Hearing regarding the Consolidated Annual Performance Evaluation Review and annual amendments (15-day Public Comment period prior to hearing)
October	Notice of Funding Availability published and applications made available for next funding round of CDBG and HOME funds
December	CDBG and HOME Applications due
January	Public meeting to present projects proposed for funding
March	Projects prioritized for funding and presented to City Council
May 1 <sup>st</sup> or 2 <sup>nd</sup> week	Public Hearing on Assessment of Fair Housing, Action Plan, and Consolidated Plan (30-day Public Comment period prior to hearing)

## 12. Criteria & Procedures for Substantial Amendments to Assessment of Fair Housing, Action Plan, and Consolidated Plan

Substantial Amendments require a 30 day public comment period. Prior to submitting Substantial Amendments to HUD, the City will publish a 30-day notice in *The Columbian* newspaper and online at [www.cityofvancouver.us/CDBG](http://www.cityofvancouver.us/CDBG) advising citizens of an opportunity to comment on such a proposed amendment.

- **Public Notice Requirement & Comment Period:** A notice of a proposed Substantial Amendment to the Assessment of Fair Housing, Action Plan, and Consolidated Plan is advertised in *The Columbian* newspaper and online at [www.cityofvancouver.us/CDBG](http://www.cityofvancouver.us/CDBG) allowing the public a 30-day comment period and listing the amendment.
- **Public Review:** During the 30-day public comment period, copies of the proposed plans will be available for review at the Vancouver City Hall (415 W 6th Street), online at [www.cityofvancouver.us/CDBG](http://www.cityofvancouver.us/CDBG), web links available through City social media formats, and where possible at public library branches within Vancouver. A reasonable number of free copies of the plans are available upon request to citizens and groups. Reasonable accommodations will be made for non-English speaking persons and for people with disabilities. For details contact the Programs Manager, CDBG/HOME Program, City of Vancouver, PO Box 1995, Vancouver, WA 98668-1995, voice (360) 487-7952 | TTY: (360) 487-8602 | WA Relay: 711.



- **Public Comments:** The public may comment on proposed amendments during the 30-day public comment period. A summary of all comments will be considered and attached to the plan. Written comments must be directed to the Programs Manager, CDBG/HOME Program, City of Vancouver, PO Box 1995, Vancouver, WA 98668-1995.

A Substantial Amendment is defined as:

- Changes to any of the goals, policies, or procedures identified in the Consolidated Plan
- Changes to the CDBG or HOME budget for a project by an amount in excess of twenty-five percent (25%) or \$15,000, whichever is greater
- Changes in the purpose, scope, beneficiaries, or location of the project
- A change in allocation priorities or method of distribution of funds
- A change in the source of funding, from one source to any other source (including program income) covered by the Action/Consolidated Plan
- Cancellation of an existing project or adding a new project

Changes that are not considered substantial amendments include:

- Data updates such as census information, income limits, fair market rents, HOME high and low market rents, HOME subsidy limits, and similar types of data shall not be considered a substantial amendment;
- Minor change in project location - A minor change in location on a specific property is not considered a substantial change as long as the purpose, scope, and intended beneficiaries remain essentially the same
- Project Budget Line Item change - The transfer of some (but not all) funds within a project from one approved budget line item to another approved budget line item (e.g., construction rather than engineering) does not constitute a substantial change.
- Emergency /Disaster Response- To ensure emergency and disaster recovery grants are awarded in a timely manner a formal adoption of an amendment to the Consolidated Plan, Action Plan, Citizen Participation Plan, or Section 108 Guaranteed Loan Application may not constitute a substantial amendment under Section 12 above.

### 13. Waiver Process

Upon determination of good cause, the U. S. Department of Housing and Urban Development has the authority to waive certain regulatory provisions of the CDBG and HOME programs subject to statutory limitations.

Following HUD issuance of waiver notices or approval of waiver requests, the City reserves the right to amend the Citizen Participation Plan as follows:

1. A reduction in the public comment period for Consolidated Plan/Action Plan substantial amendments from 30 calendar days to the HUD prescribed period, and
2. Flexibility in determining what constitutes reasonable notice and opportunity to comment.
3. Any other additional flexibility deemed necessary by HUD.



#### 14. **Minimizing Displacement**

The City will take the following steps to minimize the displacement of people, businesses, nonprofits, and/or farms:

- a) Discourage projects involving displacement/relocation through a grant application scoring system that reduces the total score of projects that anticipate displacement/relocation;
- b) Encourage project sponsors to plan or stage projects to minimize and/or prevent the adverse impacts of displacement;
- c) Provide for the establishment of temporary relocation facilities in order to provide housing to households whose displacement will be temporary;
- d) Provide advisory services, which will include such measures, facilities, and services as may be necessary to determine relocation needs, or other assistance for which displaced persons may be eligible;
- e) Coordinate code enforcement with rehabilitation and housing assistance programs; and
- f) Stage the rehabilitation of apartment units to allow tenants to remain in the building /complex during and after rehabilitation by working with empty units or buildings first.

Any residential tenant who will be permanently and involuntarily displaced shall be entitled to the following services and benefits:

- a) **Timely Information.** The tenant will be contacted and provided with timely information that fully explains the reason for the displacement and the relocation assistance available;
- b) **Advisory Services.** The tenant will be provided appropriate advisory services necessary to minimize hardships in adjusting to the relocation;
- c) **Advance Notice.** Unless there is an urgent need for the property (e.g., substantial danger to a person's health or safety) or the tenant is evicted for cause, the tenant shall be given at least 90 days' advance notice of the earliest possible date which they must vacate the property.
- d) **Replacement Housing Assistance.** Replacement housing assistance is available to both renters and owners in the form of rental assistance or purchase assistance. The replacement assistance is based on a number of factors as provided in the Uniform Relocation Act and its regulations at 24 CFR Part 24; and,
- e) **Moving Expenses.** The tenant will be reimbursed for reasonable, documented costs of his/her moving and related expenses or the tenant may elect to receive a fixed payment for moving and related expenses.