



# **TRI-CITIES HOME CONSORTIUM**

KENNEWICK · PASCO · RICHLAND

## **CITIZEN PARTICIPATION PLAN**

## **Tri-Cities HOME Consortium Citizen Participation Plan Community Development Block Grant and HOME Programs Amendments to Existing Plans**

In response to the COVID-19 Pandemic, the Tri-Cities HOME Consortium is amending its Citizen Participation Plan, to promote and support “social distancing” while continuing to offer the public an opportunity to provide valuable citizen input and insight into the policies and procedures of the Consortium, particularly as it relates to the administration and implementation of its federal programs with the use of Community Development Block Grant (CDBG) and Home Investment Partnerships Program (HOME). The following process will be used to solicit citizen participation and input into any programmatic amendments necessary to quickly and effectively administer federal funding made available as a result of the COVID- 19 Pandemic.

- Effective April 1, 2020, consistent with the Mega-waiver issued by HUD on March 31, 2020, and for a period ending program year December 31, 2020, community input prior to drafting a substantial amendment to any plan will be waived, including but not limited to an approved consolidated plan or annual action plan concerning the proposed uses of CDBG and HOME funds.
- Staff will prepare an amendment to any respective plan, where applicable, and the amendment shall include a discussion of the amount of funds the respective City expects to receive, the range of activities it will undertake with the funds, and, to the extent possible, the benefit to low and moderate income people of these proposed activities.
- The Amendment will be posted in a prominent place on the respective City’s website, along with a notice identifying the availability of the amendment. The Notice will include the opportunity to provide comments via email for a period of not less than five days and information on participation in a “virtual public hearing”. As part of the Notice, the respective City will provide information on how citizens who have special needs may obtain the Amendment in a form that is accessible to them.
- Such Notice will be published in the Tri-City Herald, the newspaper of record, no fewer than seven (7) days prior to a public hearing. Notice will also be made available to one bilingual publication.
- Copies of the Notice will be emailed to interested community stakeholders that are signed up to receive email notifications from the respective city.
- Any comments received, either at the virtual public hearing or during the public comment period will be considered by the respective City before the final amended plan is submitted to HUD. A summary of the comments and the City's responses will be an attachment to the final amended plan.



- The procedures and actions discussed above will constitute the Consortiums citizen participation plan for any substantial amendments, which may need to be made in the course of the program year. A "substantial amendment" to the plan is when the original purpose of the project is changed to a new eligible category, or modification of a project to address a different CDBG national objective or when a change in the allocation exceeds twenty-five percent of the individual City's current year's CDBG or HOME allocation, including program income.
- This amended citizen participation plan will itself be made available to the public for a five-day public comment period prior to implementation, and any interest groups may review and comment accordingly.



# Tri-Cities HOME Consortium Citizen Participation Plan Community Development Block Grant and HOME Programs

## Introduction

The purpose of this Citizen Participation Plan is to provide a framework to guide the Tri-Cities HOME Consortium (Consortium) and its members (the Cities of Kennewick, Pasco and Richland, as Lead) in their efforts to encourage citizen participation in the planning, implementation and assessment in the Community Development Block Grant (CDBG) and the HOME Investment Partnership (HOME) programs. Specifically, in the Assessment of Fair Housing, Consolidated Plan, Annual Action Plan and Consolidated Annual Performance and Evaluation Report (CAPER).

This Citizen Participation Plan is prepared and implemented in accordance with the guidance provided in U.S. Department of Housing and Urban Development (HUD) Regulations 24 CFR Part 91.105.

Prior to implementation, the Citizen Participation Plan will be available for a period of 30 days for public comment. Any amendment to the Plan will be made available for a period of 30 days advising citizens of an opportunity to comment on the proposed amendment. A summary of the comments or views and a summary of any comments or views not accepted and the reasons why it was not accepted will be attached to the plan submitted to HUD for final approval.

## Citizen Advisory Committee

Each city has established individual citizen advisory committees to serve as a link between the public, city staff and City Council, and to aid in the development of the Consolidated Plan, Annual Action Plans, CAPER review, and assist in the administration and utilization of HUD grants. Each advisory position is selected based upon providing a balance of specific community interests or expertise to the committee. Low and moderate-income persons are encouraged to participate when a position becomes vacant. This is accomplished through public solicitations as well as direct communication with residents and participants in various social service organizations.

Each advisory committee will meet as necessary to review and make decisions regarding CDBG and HOME. These meetings are open to the public. The advisory committees review written funding requests, attend oral presentations by applicants, and make funding recommendations to the respective City Council to aid in the development of the Annual Action Plan.

## Encouraging Public Participation

It is the intent of Tri-Cities HOME Consortium to encourage and facilitate the participation of all citizens in the development of the Assessment of Fair Housing (AFH), Consolidated Plan, Annual Action Plan, any substantial amendments to the plans and the performance report through public hearings and meetings. Additionally, the Consortium encourages involvement of protected classes, low- and moderate-income persons, particularly neighborhoods where 51 percent, or an amount determined by HUD as an exception criteria service area, where federal funding is proposed to be used. The Consortium also welcomes the participation of minority populations, non-English speaking persons and persons with disabilities.

Consultations, with direct mailings/emails and other contact will be made with local and regional organizations and through other publications that serve those in protected classes, or that provide assisted housing, health services, and social services, including those focusing on services to children, elderly persons, persons with disabilities and their families, and homeless persons.

## The Consolidated Plan (CP)

The development of the CP is a cooperative effort between the cities of Kennewick, Pasco and Richland as members of a Consortium, businesses, developers, nonprofit organization, philanthropic organizations, and community-based and faith-based organizations that serve low and moderate-income persons. This document provides the planning framework, strategies, goals and performance benchmarks to be achieved over a five-year period by the CDBG and HOME Programs. HUD will evaluate the performance of each City and the Tri-Cities HOME Consortium through the accomplishments of community development and housing program goals established in the CP.

At least two public hearing will be held by the Consortium throughout the development of the CP to allow participation from the public on this planning document. At least one of the public hearings will be held before the Consolidated Plan is published for comment. The draft CP Plan will be made available for public review and comment for a minimum of 30 days to allow for interested persons and organizations to comment prior to completion and submission of the final plan to HUD. A summary of the comments or views and a summary of any comments or views not accepted and the reasons why it was not accepted will be included in the final plan submitted to HUD for final approval.

## Assessment of Fair Housing Plan

If applicable, the Tri-Cities HOME Consortium and the two local housing authorities, Kennewick Public Housing Authority (KHA) and City of Pasco & Franklin Consortium Housing Authority (HACPFCA) operating within Consortium jurisdiction will enter into a Joint Agreement to align their consolidated planning cycle(s) in accordance with the regulations at 24 CFR Part 91 for consolidated plan program participants, and 24 CFR part 903, for Public Housing Authorities. PHAs agree to collaborate with the Tri-Cities HOME Consortium to prepare the Assessment of Fair Housing.

Furthermore, the Tri-Cities HOME Consortium and the Kennewick and Pasco Housing Authorities will work together by establishing comprehensive community development goals and ensure strategies and actions are taken to Affirmatively Further Fair Housing. Moreover, local and regional fair housing organizations and enforcement agencies will be consulted with. The Consortium members will report progress on those goals to HUD through the consolidated annual performance reports (CAPER) that are posted on each Cities website and in a HUD database.

HUD set out the following four clear fair housing goals for all communities to ensure greater opportunities for all Americans:

1. *Reduce segregation, and build on the nation's increasing racial, geographic and economic diversity.*
2. *Eliminate racially and ethnically concentrated areas of poverty*
3. *Reduce disparities in access to important community assets such as quality schools, job centers, and transit*
4. *Narrow the gaps that leave families with children, people with disabilities, and people of different races, colors and national origins with more severe housing problems (disproportionate housing needs)*

The Public, residents, public agencies and other interested parties will have access to any HUD provided data and other supplemental information the HOME Consortium plans to incorporate into its Assessment of Fair Housing (AFH) at the start of the public participation process or as soon as feasible after. The HOME Consortium may make HUD provided data available to the public by cross-referencing to the data on the HUD website.

Consortium staff will hold at least one public hearing and meet with community groups, reviews HUD data tables and HUD maps to develop the Assessment of Fair Housing (AFH) Plan goals. Through collaboration with the Housing Authorities of Kennewick and Pasco, staff will consult with HA Resident Boards in accordance with procedures described in 24 CFR 903.13, 903.15, 903.17 and 903.19 in the process of conducting the Assessment of Fair Housing (AFH), obtaining Resident Advisory Board and community feedback, and addressing complaints.

The draft AFH Plan will be made available for public review and comment for a minimum of 30 days as a Consortium plan. Otherwise, teaming with the local PHAs will require a minimum of 45-day review and comment period. A summary of the comments or views and a summary of any comments or views not accepted and the reasons why it was not accepted will be included in the Assessment of Fair Housing (AFH) Plan, submitted to HUD for final approval.

## **Annual Action Plan (AAP)**

The AAP is a document that serves as the application for annual funding to HUD under the CDBG and HOME Programs and identifies federal and other funding resources that are expected to be used to address the needs identified in the CP. This plan represents programs and activities that will be undertaken from January 1 through December 31 of each program year. It identifies the amount of grant funds and program income each city anticipates receiving each year, gives a specific description of the programs and activities that will be used to address the priority needs established in the Consolidated Plan, and provides benchmarks and goals to benefit low and moderate-income persons in which to measure program performance.

At least two public hearings will be held by each individual City each year at separate stages of development of the plan. The draft AAP Plan will be made available public review and comment for a minimum of 30 days to allow for interested persons and organizations to comment prior to completion and submission of the final plan to HUD. A summary of the comments or views and a summary of any comments or views not accepted and the reasons why it was not accepted will be included in the final plan. The Annual Action Plan is submitted to HUD once grant formula allocations have been announced each program year.

## **Section 108 Loan Guarantee Program**

The Section 108 of the Housing and Community Development Act of 1974 provides for a loan guarantee component specific to the CDBG Program. If applicable, and a member Grantee (Kennewick, Pasco or Richland) moves forward with a program application to HUD the Grantee will comply with requirements in 24 CFR 570.704(a)(2). In addition, the following would apply:

- Prior to submission of an application for loan guarantee assistance to HUD the Grantee must publish the proposed application community wide to allow the public to examine the application and to provide comments on the proposed application.
- The public will be given timely notification of public hearings, reasonable and timely access to local meetings, information, and records relating to the proposed and actual use of guaranteed loan funds, including, but not limited to the amount of funds expected to be made available, including anticipated program income generated from activities carried out with guaranteed loan funds, range of eligible activities to be undertaken, proposed low-moderate beneficiaries, etc. Technical assistance may be provided to representative groups at the discretion of the Grantee.
- The public will be provided reasonable advance notice of, and opportunity to comment on, proposed activities not previously included in the application and activities, which are proposed to be deleted or substantially changed in terms of purpose, scope, location, or beneficiaries in accordance with requirement for a significant amendment.
- Grantee policies and procedures will provide for timely written answers to written complaints and grievances within 15 working days of the receipt of the complaint, where practicable.

## Consolidated Annual Performance and Evaluation Report (CAPER)

This report describes the accomplishments of each activity undertaken during the previous year, identifies how funds were actually used versus how the funds were proposed to be used, what impacts the activity realized, and to what extent the funds benefited low and moderate-income persons.

The draft CAPER will be made available public review and comment for a minimum of 15 days to allow for interested persons and organizations to comment prior to completion. A summary of the comments or views and a summary of any comments or views not accepted and the reasons why it was not accepted will be included in the final plan submitted to HUD for final approval. The CAPER is due no later than 90 days following the end of the program year, or by March 31 of each year.

## Public Hearing Notice

Public hearings, meetings will be published as a display ad in the non-legal section of the newspaper of record, the Tri-City Herald and at respective member city's website at least 14 days prior to the hearing. Public hearing notices will also be made available to one bilingual publication. The notice will include some or all of the following information as appropriate to the particular event:

- The date, time and place.
- Estimated amount of funds that will be available for distribution, and the amount that will benefit low and moderate-income persons.
- Topic(s) to be discussed including, but not limited to, housing and community development needs, development of proposed activities, and review of program performance.
- Proposed strategies and actions for AFH.
- Basic information about the program(s).
- Timing and procedures followed in the development and approval of the CP, Annual Action Plan, Substantial Amendments, or CAPER.
- Contact name and phone number for requesting additional information or special accommodations.

**Public hearings and meetings will be held at times and in locations convenient to potential or actual beneficiaries, and that are easily accessible to persons with disabilities. All comments and views of residents of the community in writing or orally during a public hearing or meeting will be considered and attached to the plan.**

## Public Comment Period

The draft or substantial amendments to the Citizen Participation Plan, Assessment of Fair Housing, Consolidated Plan, Annual Action Plan or CAPER will be made available for public comment for the minimum 15, 30 or 45 days, as required. A notice of the public comment period, the locations where the plan is available for review, and a summary of the plan will be published in the Tri-City Herald, one bilingual publication and in other places frequented by the public, especially low- and moderate-income persons and persons benefiting from or affected by proposed CDBG/HOME activities. The notice of the public comment period, as well as the draft, will be posted on the respective City's website. Additionally, direct outreach to local and regional organizations that serve those in protected classes, assisted housing providers, public housing agencies, social service agencies, and advocacy groups, as well as their beneficiaries, will be utilized to broaden the efforts to notify all. All comments and views of residents of the community in writing during a public comment period will be considered and attached to the plan.

**A reasonable number of free copies of the draft plan will be available upon request by calling or visiting the respective City's Office during regular business hours. The draft plan may be made available in an alternative format with a three-day notice for a request to the respective city member.**

## Non-English Speakers

The Consortium has elected to address the Limited English Proficiency (LEP) need as a reasonable accommodation. Language assistance will be given to ensure meaningful access to participation by non-English speaking residents of the community. Given reasonable notice, during regular business hours, the following accommodation may be requested:

1. Interpretation services for clients, at no cost to the clients,
2. Documents may be translated for clients who do not communicate in English,
3. A TTY telephone shall be provided for clients,
4. Consortium members shall provide printed materials in alternate formats for clients, or
5. Consortium members shall make whatever reasonable accommodations are needed to improve accessibility to programs, activities and services.

### **Request assistance by contacting the respective Member City:**

- City of Richland, Community and Development Services Office, (509)942-7580
- City of Kennewick, Management Services Office, (509)585-4432
- City of Pasco, Community and Economic Development Office, (509)545-3441

## Reasonable Accommodation

Pursuant to the Rehabilitation Act of 1973 and the Americans with Disability Act of 1990, within reason, any individual with an impairment or disability who requires reasonable accommodation to attend or participate in a meeting or public hearing may request assistance. Assistance may be requested 48 hours prior to meeting, during regular business hours.

### **Request assistance by contacting the respective Member City:**

- City of Richland, Development Services Office, (509)942-7580
- City of Kennewick, Management Services Office, (509)585-4432
- City of Pasco, Community and Economic Development Office, (509)545-3441

## Plan Approval

The Citizen Participation Plan recognizes Kennewick, Pasco and Richland City Councils, as the elected governing body for each City. The draft Assessment of Fair Housing, Consolidated Plan and/or Annual Action Plan as well as Substantial Amendments to the Plans will be presented to the respective member City Council for approval before submitting to HUD. These are regularly scheduled Council meetings that are open public meetings and broadcast live.

## Amendments or Substantial Amendments to the Plan

An “amendment” to the approved plan will occur when a revision is made to the priority needs, a change is made in the method of distribution of funds, when an activity not previously identified in the plan is added, or when the purpose, scope, location or beneficiaries of an activity are changed.

A “substantial amendment” to the approved AFH Plan will occur when fair housing contributing factors, priorities and or goals in the Assessment of Fair Housing Plan no longer reflect actual circumstances. A “substantial amendment” to an approved Consolidated Plan or Annual Action Plan will occur with any of the following conditions:

1. Increasing or decreasing funding levels of twenty-five (25) percent of the City’s current or prior year CDBG or HOME approved project/activity allocations, including program income.
2. Modification of a project to address a different CDBG national objective, or
3. Changes in the use of CDBG funds from one eligibility category to another, in accordance with 24 CFR 91.105(c).



A substantial amendment to a plan will be forwarded to the respective City’s advisory committee; a display ad will be placed in the Tri-City Herald and in one available publication, and will be available for a period stated below for public review and comments. Upon expiration of the review and comment period, and approval by the individual City’s Council, the proposed change will be signed by the authorized official of the jurisdiction and submitted in the Integrated Disbursement Information System (IDIS) for HUD approval.

<b>Plan</b>	<b>Comment Period</b>
<b>5-year AFH Plan Consortium only</b>	<b>30-Day</b>
<b>5-year AFH Plan team with PHA</b>	<b>45-Day</b>
<b>5 year Consolidated Plan</b>	<b>30-Day</b>
<b>Annual Action Plan</b>	<b>30-Day</b>

### **Responding to Complaints**

Each City will consider written complaints from the public regarding the citizen participation process, the Consolidated Plan, the Assessment of Fair Housing Plan, the Annual Action Plan, any amendments and the CAPER. Where practicable. A written response will be made within 15 working days. Where not practicable, written responses will be made as quickly as possible. If the complainant is unable to file a complaint due to disability, alternative filing methods will be allowed by contacting the respective City.

### **Access to Records**

Each city will be responsible for providing citizens, public agencies and other interested parties within five days of request, access to information and records relating to the City’s Consolidated Plan and the use of assistance under the CDBG and HOME programs covered during the preceding five-year period. Such access shall be consistent with applicable State and local laws, subject to privacy and obligations of confidentiality.

### **Staff Support and Technical Assistance**

Staff from each city will be responsible and will make every reasonable effort to provide access and technical assistance to citizens, and agencies representing low and moderate-income persons, in order that they may participate in planning and assessing projects. Staff from each city will also respond to those who request assistance in developing proposals for CDBG or HOME funding, and will provide technical assistance to assist in the implementation of the project.

### **Relocation and Displacement Policy**

The Cities of Kennewick, Pasco and Richland intend to minimize to the greatest extent possible, the permanent displacement of any low and moderate-income persons that might result from the use of CDBG or HOME funds. This will be achieved through the design and evaluation of each project for potential displacement, by measuring and comparing such potential among alternative proposals and designs, and by considering alternatives when selecting projects for funding, prior to a final commitment of funds.

While there is no intent to directly displace individuals, families, businesses, or nonprofit organizations because of projects, the respective City will assist any individual, family, business, or nonprofit organization displaced by projects funded with CDBG or HOME funds as authorized under the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended, or under Section 104(d) of the Housing and Community Development Act of 1974. The Cities reserve the right to reject a project, or require that any sub-recipient provide non-federal financial relocation assistance to persons or organizations affected by the project, if the project causes permanent displacement.



## Availability of Documents

Citizens are encouraged to review draft plans on the respective City's website and at the following locations:

### **Richland**

<https://www.ci.richland.wa.us/CDBG>

- City of Richland, Development Services Office, 625 Swift Blvd.
- Richland Public Library, 955 Northgate Dr.

### **Kennewick**

<https://www.go2kennewick.com/620/Community-Development-Block-Grant>

- City of Kennewick, Management Services Office, 210 W. 6<sup>th</sup> Ave.
- Mid-Columbia Library, 1620 S. Union
- Kennewick Housing Authority, 1915 W. 4<sup>th</sup> Pl.

### **Pasco**

<https://www.pasco-wa.gov/188/Five-Year-Consolidated-Plan>

- City of Pasco, Community and Economic Development Office, 525 N. 3<sup>rd</sup> Ave.
- Pasco Public Library, 1320 W. Hopkins St.
- Pasco and Franklin County Housing Authority, 2505 W. Lewis St.

Approved plans will be available on respective City's website and at member City offices.

***Given reasonable advanced notice, individual, electronic or copies in a format accessible to non-English speaking persons and persons with disabilities will be made available by calling or visiting the respective Member City's Office during regular business hours.***