

# **CITY OF TACOMA**

## **CITIZEN PARTICIPATION PLAN GUIDE FOR CITIZEN INVOLVEMENT**

### **CONSOLIDATED PLAN FOR HOUSING AND COMMUNITY DEVELOPMENT**

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## Citizen Participation Plan

In Tacoma, citizen participation has always been strong, but often this participation has not fully represented all of Tacoma's citizens, such as low income, the elderly, minorities, persons with disabilities, youth or persons with limited English proficiency. However, Tacoma's city government and its citizens are committed to the growth of Tacoma as a pleasant, safe and united community for all its citizens and believe this goal can best be met by increasing opportunities for citizen participation in local government decisions that improve the quality of life in Tacoma.

To receive funding for housing and community development programs from the Department of Housing and Urban Development (HUD), the City must develop a Consolidated Plan for the use of these funds. The Plan consolidates a five-year strategic plan with the applications for the Community Development Block Grant (CDBG), Home Investment Partnership (HOME), and Emergency Solutions Grant (ESG) Programs. The City encourages the participation of all citizens in developing the Consolidated Plan, any substantial Plan amendments, and the Plan performance report. The City particularly encourages the participation of low-income persons, persons living in low-income neighborhoods, persons living in areas targeted for revitalization, residents of public and assisted housing, minorities, non-English speaking persons, persons with disabilities, and other persons affected by the Plan. In addition, the City encourages businesses, developers, philanthropic organizations, community and faith-based organizations, and public housing authorities to participate in the planning process.

The Citizen Participation Plan was initially adopted to encourage involvement in the CDBG Program and was subsequently amended to provide an ongoing mechanism for widespread citizen participation in HUD funded programs.

In 1997, the City Council modified the allocation process for federal funds to make the development of housing projects more effective and efficient. The December 1997 amendment to the Citizen Participation Plan modified the allocation process by separating the housing development allocations from all other allocations of federal CDBG, HOME, and ESG funds.

In 2005, the City Council amended the Citizen Participation Plan to further define the responsibilities of the Human Services Commission (HSC) and the Tacoma Community Redevelopment Authority (TCRA), committees appointed by the Council.

In 2013, the City Council amended the Citizen Participation Plan to include a new section to facilitate the participation of residents with limited English proficiency. This new section is intended to increase language access to the Consolidated Plan and related documents and to the planning process associated with the development and implementation of these documents. The Plan will also update changes to City department names, federal grant name changes and the responsibilities of the HSC and TCRA.

In 2015, the City Council amended the Plan to include specific language and new responsibilities for the TCRA to directly acquire property for redevelopment through its existing Affordable Housing Fund and newly created Economic Development Fund.

In 2020, in response to the COVID-19 crisis, HUD allowed cities to offer a shorted 5-day public comment period on substantial amendments to the Annual Action Plan on funds related to crisis relief. The City amended the Plan to permit a 5-day public comment period as well as allow for virtual public hearings if attendance could cause a public safety issue.

## **A. Background**

The City encourages citizens to be involved in the identification of needs, the development of plans and strategies, the review of proposed activities, and the review of program performance. The Consolidated Plan and the programs funded by the Plan are designed to improve opportunities for decent housing, a suitable living environment, and economic development, particularly for low and moderate income persons. This Citizen Participation Plan outlines the opportunities citizens have to participate in the program.

Tacoma's citizens and community groups have demonstrated their understanding of the city's needs and their commitment to improving the quality of life in Tacoma. Therefore, recognizing the valuable contribution by citizens in the community development process, the City of Tacoma encourages their continued participation.

While this Citizen Participation Plan gives citizens many opportunities to participate in the planning, implementation and assessment of the Consolidated Plan programs, final local authority for development, modification and execution of the Consolidated Plan lies with the City Council and its appointed officials.

Tacoma citizens have the opportunity to participate throughout the Consolidated Plan development process.

Groups and individuals are encouraged to identify needs, to express their opinions at one or more needs assessment public hearings, and to submit project proposals to meet community needs.

On the citywide level, several citizen committees are appointed by the City Council to provide advice and input into the process of developing and implementing the Consolidated Plan. The Human Services Commission (HSC), the Tacoma Community Redevelopment Authority (TCRA) and the Planning Commission provide input on housing and community development needs and strategies. Specifically, the Planning Commission reviews and makes recommendations on the five-year Consolidated Plan. The HSC and TCRA develop, for City Council approval, biennial funding strategies in the Funding Priorities Statement for their respective human service, housing, community and economic development activities and programs. In addition, TCRA reviews proposals for minor housing/capital projects, public facility projects, and economic development activities, including applications for use of designated housing and community development funds supported with CDBG and HOME monies. The HSC reviews proposals for human service programs supported with CDBG public services funding.

With regard to ESG funding, federal regulations now require the City to consult with the Tacoma/Lakewood/Pierce County Continuum of Care, the local planning body for homeless services. As a result, the responsibility for reviewing proposals and making recommendations for ESG funding no longer exclusively resides with the Human Services Commission. A special 5-member review panel that includes Continuum of Care members, HSC members, and a formerly homeless individual is responsible for reviewing applications and making funding recommendations for City Council approval.

Funding recommendations for all of these projects are made to City Council once each year. The City Council holds a public hearing prior to making final funding decisions and submitting the Five Year Consolidated Plan and/or the Annual Action Plan to the U.S. Department of Housing and Urban Development (HUD) for approval.

## **B. Purpose**

The purpose of the Citizen Participation Plan is to inform citizens of opportunities to express their needs and wishes for community improvements and to participate in planning and implementing needed improvements. Additionally, this plan provides for representation of all of Tacoma's citizens by allowing them to have a voice in the decision-making process. Citizens are provided an opportunity to participate in developing the Consolidated Plan, including annual updates and any significant amendments.

## **C. Consolidated Plan Processes**

### *Five Year Consolidated Plan*

The HSC and the TCRA, in consultation with the Community and Economic Development (CED) Department, Neighborhood and Community Services (NCS) Department, city officials, public agencies, housing developers and providers, community groups, service providers, and citizens, develop a community profile, identify housing and community development needs, and develop a five-year strategic plan. The Consolidated Plan is reviewed by the Planning Commission prior to consideration by the City Council.

### *Annual Action Plan*

Before the beginning of the Annual Action Plan process, CED and NCS provides citizens, public agencies and other interested parties with basic information about the program (amount of funds expected to be available, range of activities that will be considered, and an estimate of the amount of funds that will benefit low income persons), and outlines specific opportunities to participate in developing the Annual Action Plan. The Departments publishes an advertisement in a newspaper of general circulation which provides basic program information, outlines opportunities to participate in the process, and notifies citizens when the process begins.

One or more public hearings are held at the beginning of the process to assess housing and community development needs. Citizen input is considered when establishing funding priorities. All citizens, housing developers and providers, and community organizations representing low and moderate income persons and residents of blighted and deteriorated neighborhoods, are encouraged to submit proposals for funding. During the proposal application period, applications

may be obtained from the City’s Customer Service Center, CED, NCS, or downloaded from the City’s website.

At least 30 days prior to adoption of the Consolidated Plan Five Year Strategic Plan and/or the Annual Action Plan, the City will publish a summary of the draft plan in a newspaper of general circulation. As stated in the CARES act, a 5-day comment period is permitted regarding all funds associated with the act and responding to community impacts due to COVID-19.

Free copies will be made available for citizen review in the Tacoma Public Library, CED, NCS, the City’s website and other public places. A summary of citizen comments will be incorporated into the final Consolidated Plan and/or Annual Action Plan.

Virtual Public Hearing Option: Under certain condition, including but not limited to states of emergency, national state or local declarations, disaster declarations, or similar declarations resulting from health or other public safety concerns, the City may have the option to conduct one or all of its public hearing via virtual means, provided the hearing allows questions in real time, with answers coming directly from the elected representatives to all “attendees”. The public hearing must provide accessibility for persons with disabilities and those with limited English proficiency.

#### **D. Annual Action Plan - Human Services Recommendations**

All CDBG and ESG supported human service proposals are submitted to NCS and then provided to the HSC and ESG Review Panel for review and recommendation to the City Council. The final decision for CDBG funded human services and ESG funded proposals is made by the City Council.

After the HSC and ESG Review Panel has made their recommendations to the City Council regarding CDBG and ESG supported human service programs, but prior to final City Council action on the Annual Action Plan, applicants submitting specific proposals are notified in writing whether or not their proposals have been recommended for funding. This notification includes the date, time and place of the public hearing before the City Council.

#### **E. Annual Action Plan - Housing / Community Development Recommendations**

All housing and community development proposals (e.g. minor housing/capital projects, community/public facilities, and economic development) are submitted to CED and provided to TCRA for their funding recommendations to City Council. The final decision for these specific CDBG and HOME funded housing and community development proposals is made by the City Council. City Council will also allocate funds directly to TCRA for their operation of direct housing programs such as homeowner rehabilitation and down payment assistance.

Through the Annual Action Plan Process, the City Council will allocate CDBG, HOME and any other funds to support the Affordable Housing Fund (AHF) and/or the Economic Development Fund (EDF) administrated by TCRA. Under the AHF program, TCRA will invite developers to

submit proposals to TCRA. Housing proposals are then reviewed and funds awarded by the TCRA with decisions based on funding priorities adopted by the City Council and prudent lending practices within the affordable housing industry. TCRA will also conduct an open application process, request for funding economic development activities through its EDF program. These activities will also be reviewed and funded by TCRA. TCRA may, under either fund, choose to directly acquire and redevelop real property.

Prior to awarding funds from either the AHF or the EDF or for any TCRA direct acquisition or redevelopment project, TCRA will provide a 30-day public comment period (or 5-day comment period if responding to COVID-19 impacts) on the application(s) and/or project(s) under consideration. TCRA will also provide an opportunity to receive oral comments within the comment period. Applicants will be notified in writing whether or not their application has received approval for funding by the TCRA and informed of the process for appealing TCRA decisions and the grounds on which an appeal may be based. Similarly, members of the public will be informed of the process for submitting comments during the comment period regarding any TCRA direct property acquisition(s). These comments will be made available to the TCRA Board for its consideration. Projects approved by the TCRA Board will be published in the local paper as an Amendment to the Annual Action Plan, following the amendment guidelines stated below. This process is incorporated into the funding agreement between TCRA and the City.

## **F. Contingencies and Amendments**

The HSC and TCRA may recommend to the City Council alternate projects which can be implemented if projects approved by the City Council, HSC or the TCRA are rejected by the Department of Housing and Urban Development. When projects are substantially changed, the HSC and/or TCRA are notified and consulted for comments or recommendations prior to implementation of the amendment. Prior to City Council action on a substantial amendment to the Plan, a notice of the proposed change is published in a newspaper of general circulation 30 days (or 5 days if the amendment is responding to impacts of COVID-19) prior to implementation.

When a substantial amendment is proposed, the City Council allows public comment at a regularly scheduled Council meeting before acting on the substantial amendment to an approved Consolidated Plan. This public comment opportunity takes the place of a formal public hearing. A summary of citizen comments and why the comments were accepted or rejected will be attached to the amendment prior to its submission to HUD.

A substantial amendment is defined as:

1. A change of 25 percent or more in project funding. Changes that are less than \$100,000 are not considered substantial.
2. A change of 25 percent or more in project beneficiaries (i.e. income groups, ethnic groups, limited clientele groups, residents of a targeted area) or a change in purpose, scope or location which would change the project beneficiaries by more than 25 percent, or

3. A determination is made by the Director of either CED or NCS that the change is substantial, even though it falls below the standards in Sections 1 and 2 above.

TCRA funding decisions that meet the approved criteria of an established loan program or an approved Affordable Housing Fund (AHF) or Economic Development Fund (EDF) allocation are not considered substantial amendments. TCRA may select alternate projects during a funding cycle which can be implemented if an approved project does not achieve milestones set at the time of funding, the project is discontinued or postponed, or for whatever other reason an approved project is unable to perform in a timely manner. If alternative projects are not recommended and a project fails, the funds are reallocated for a future round of funding.

## **G. Performance Report**

The City prepares a Consolidated Annual Performance and Evaluation Report (CAPER) for Consolidated Plan programs at the end of each program year. The City publishes a notice in a newspaper of general circulation that the report has been completed and is available for review at least 15 days prior to submission of the CAPER to HUD. Citizens are given at least 15 days to submit comments on the report. The City considers any comments received and summarizes the comments in the report.

## **H. Consolidated Plan Public Hearings**

The City holds two types of public hearings each year.

The first hearing (or hearings) is held to allow citizens and applicants the opportunity to identify needs and priorities and comment on prior performance. Hearings are held in locations which are accessible to residents of areas where housing and community development activities are proposed and ongoing. Hearings are held at times which are convenient to those affected by the Consolidated Plan programs. A final hearing is held by the City Council prior to adopting the City's Five Year Consolidated Plan and/or Annual Action Plan, giving citizens and applicants an opportunity to comment on the proposed plan and on program performance.

CED and NCS will notify citizens and applicants of the dates, times, places and procedures of public hearings through newspaper advertisements. Notices of public hearings will be provided to agencies serving non-English speaking residents of the city. Upon request, the City will have translation services available during the public hearings. Interested citizens must notify CED and NCS 72 hours in advance of the scheduled hearing of the type of translation services needed. (refer to the Limited English Proficiency section of this plan). All public hearings and public meetings scheduled as part of the Consolidated Plan process will be held in facilities which are accessible to physically disabled persons.

## **I. Meetings**

All public hearings, citizen advisory committee meetings and other public meetings are open to the public in accordance with the RCW Chapter 42.30 Open Public Meeting Act.

## **J. Availability of the Plan to the Public**

The draft plan and any substantial amendments are published prior to City Council action to allow time for citizen review and comment. Citizens and applicants are notified of the availability of the draft Consolidated Plan for review by publication of a plan summary in a general circulation newspaper. Citizens are given 30 days' notice prior to adoption of the plan (or 5 days if the amendment is related to COVID 19 relief). Copies of the plan are available in CED, NCS, Tacoma Public Library and other public places. Citizens are given 30 days' notice (or 5 days if the amendment is related to COVID 19 relief) prior to the implementation of any substantial amendments and copies of the amendments are available from CED and NCS.

#### **K. Limited English Proficiency (LEP) Residents**

Residents who, as a result of national origin, do not speak English as their primary language and who have limited ability to speak, read, write or understand English may be entitled to language assistance related to the planning, programming and implementation of federal CDBG, HOME and/or ESG funding by the City of Tacoma. In providing such language assistance, the City will be taking affirmative steps in complying with Title VI of the Civil Rights Act of 1964, which is the federal law which protects individuals from discrimination.

The two primary goals of this policy are to provide specific services to eligible individuals in need of language assistance and to increase participation of residents from all races and national origins comparable to their representation within this community. The threshold for eligibility and access to language services shall be 5% of the population as determined in the most current federal Census. Since the 2000 Census identified 6.9% of the Tacoma resident population as either Hispanic or Latino, special considerations (e.g. publishing the Annual Action Plan in Spanish and English) will be directed to this group in the implementation of the Citizen Participation Plan.

The provision of the language assistance shall be implemented by the Community and Economic Development (CED) Department and/or the Neighborhood and Community Services (NCS) Department.

#### **L. Access to Records**

All public records, as defined by the State Public Disclosure Act, are available for review in the offices of the Community and Economic Development (CED) Department and the Neighborhood and Community Services (NCS) Department during normal business hours. Requests for records are handled in accordance with the City of Tacoma's policy for review of public records. A reasonable fee may be charged for copying records for citizens.

#### **M. Technical Assistance**

Any citizen, public agency, housing developer or provider, or other funding applicant may contact CED or NCS for technical assistance. CED staff will help anyone who is interested in understanding Consolidated Plan programs and federal regulations, the Consolidated Plan, City Council policies, the procedures for submitting a proposal, the Citizen Participation Plan and other program requirements so they can effectively participate in the Consolidated Plan development process. NCS staff will assist nonprofits and other applicants in the development of CDBG and

ESG supported human service proposals as part of the application process. CED staff will also advise housing developers and providers, citizen groups representing low and moderate income persons and residents of lower income or blighted neighborhoods on how to formulate needs statements and project proposals. Staff members from CED and NCS will be available before and after each public hearing to give citizens assistance. Staff members will help the HSC and TCRA in obtaining any information or assistance they need to make their recommendations and decisions.

## **N. Complaints**

All written citizen complaints are referred to the appropriate staff person(s) for action. Under normal circumstances, the department will respond to the person making the complaint within 15 days. All complaints and responses will be kept on file.

## **O. Citizens Advisory Committees**

The Tacoma Mayor and City Council defines by ordinance, resolution or agreement the functions of and appoint members to the HSC, TCRA and the Planning Commission. These advisory committees will, to the extent possible, include low and moderate income persons, representatives of community groups, and members of minority groups. The HSC is the citywide citizen advisory committee which recommends CDBG supported human services to the City Council. The TCRA is composed of professionals from the lending, construction, real estate, accounting and legal fields. It recommends funding for housing and community and economic development proposals and makes underwriting decisions on housing and business loans. The Planning Commission, which was created by the City of Tacoma's Charter with members appointed by the City Council, will review and make recommendations on the Consolidated Plan Five Year Strategy. The ESG Review Panel, which recommends ESG-supported human services, is not appointed by the City Council, but is rather subject to the requirements of ESG regulations.

## **P. Implementation**

Each program is different and requires a unique form of public involvement during the implementation phase. Typical forms of involvement considered by CED and NCS include, but are not limited to, the following: direct participation in a program such as applying for a housing rehabilitation, development or business loan, formation of a citizens advisory committee for the planning and operation of a program, participation in the architectural selection committee for a project, conducting neighborhood surveys, holding meetings, or similar activities. Each project will use the form of citizen/organization involvement most appropriate to the project's purpose.

There will be an opportunity to comment on the implementation of projects when the City Council considers implementing resolutions for projects requiring Council approval.

## **Q Effective Date and Amendments**

This plan, as amended, will be effective May 2020 and will remain in effect as long as Consolidated Plan activities are ongoing or until superseded by a new Citizen Participation Plan. Citizens will be given notice and an opportunity to comment on any substantial amendments to the

Citizen Participation Plan. This Plan will be made available to the public at the offices of CED and NCS. Persons with disabilities that need special accommodations to review this Plan may make a request to CED or NCS, and reasonable accommodations will be made to provide the document in a form that is accessible to the person making the request.

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