

2024 DRAFT Community Participation Plan



City of Vancouver
Economic Prosperity and Housing
April 2024



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CDBG AND HOME COMMUNITY PARTICIPATION PLAN¹

Introduction

The City of Vancouver (City) 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. Grants are awarded based on a formula that considers the area population, the number of people living in poverty, the level of overcrowded housing, and the age of its housing.

To receive this funding, a jurisdiction must develop a five-year Consolidated Plan for Housing and Community Development (Consolidated Plan). The Consolidated Plan establishes a unified vision of housing and community development strategies utilizing the two federal grants received by the City and other housing and community development resources. The plan focuses on decent housing, suitable living environments, and expanding economic opportunities for low and moderate-income or disabled persons.

This Community Participation Plan (CPP) provides for and encourages community members to participate and provide feedback on the development of the following documents prepared by the City:

- **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.
- **Annual Action Plan (Action Plan):** Provides annual updates on funding available and the proposed uses of the funds. An application review process prioritizes programs and projects for funding awards. The Action Plan is subsequently approved by City Council and submitted to HUD for approval each year.
- **Assessment of Fair Housing (AFH):** An analysis of fair housing issues and contributing factors in a community related to fair housing practices. The AFH guides 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 data, programs must generate goals to inform the subsequent planning cycle.
- **Consolidated Annual Performance Evaluation Report (CAPER):** Analyzes progress towards the goals established in the Consolidated Plan and implemented through the Action Plan. The CAPER also provides information on the performance of funded projects related to HUD and local program objectives.

¹ 24 CFR Part 91.105 requires that jurisdictions adopt a citizen participation plan that sets forth the jurisdiction's policies and procedures for citizen participation in the HUD-funded programs. As an effort to be more inclusive and use inclusive language, the City refers to this document as the Community Participation Plan (CPP). The CPP adheres to all the federal requirements under Part 91.

- **Substantial Amendments to the Action Plan and Consolidated Plan:** Changes in program priorities, budget reallocations, changing project scope or design, and/or other policy revisions.

Community Participation Summary

Activity	Frequency	Due Date	Comment Period	Public Hearing
Consolidated Plan	Every 5 years	May 15	30 days	1
Action Plan	Annually	May 15	30 days	1
Substantial Amendment	As needed	--	30 days	Not required
CAPER	Annually	September 28	15 days	1
Emergency Amendments to CPP, Consolidated Plan and/or Annual Action Plan	As needed	--	5 days	Not required

Final Policy/Implementation Authority

The Community Participation Plan recognizes that 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.

City Council will review and approve amendments as needed.

Encouragement of Community Participation

Interested groups² and individuals are encouraged to provide input into all aspects of the City's consolidated planning activities, from assessing needs and setting priorities through performance evaluation. The CPP offers numerous opportunities for community members to contribute information, ideas, and opinions about ways to improve our neighborhoods, promote housing affordability, and enhance the delivery of public services to all community members.

In developing the Consolidated Plan, the City will undertake community engagement efforts that are culturally responsive and encourage hard to reach populations including:

- People with low and moderate-income, particularly those living in areas where CDBG funds are proposed to be used;
- Community members of predominantly low and moderate-income neighborhoods;
- Black, Indigenous, People of Color (BIPOC) Communities
- People with Limited English Proficiency and/or non-English-speaking people;
- People with disabilities; and
- Community members living in public and assisted housing developments.

²Interested Groups include local and regional institutions, the Vancouver Housing Authority, the Coalition of Service Providers, and other organizations (including businesses, developers, nonprofit organizations, philanthropic organizations, and community-based and faith-based organizations) in the process of developing and implementing the Consolidated Plan.

To ensure broad outreach, the City will make housing and community development plans and reports available via digital media, i.e., city websites, social media and email announcements will contain summaries of programs and reports with links to specific documents. Likewise, public comments may be accepted via email during specified comment periods.

All community members from the City of Vancouver are encouraged to participate in the development and review of these reports.

Comments on the Community Participation Plan and Amendments

The City will provide community members a reasonable opportunity to comment on the CPP, and on substantial amendments to the CPP, and will make the CPP public. The CPP will be made available in a format accessible to people with disabilities upon request.

The CPP is part of the City's Consolidated Plan and is subject to all community comments. The CPP may be amended to reflect comments received during the Consolidated Plan CPP process.

Assistance for those with Limited English Proficiency and People with Disabilities

All public meetings, workshops, and hearings are held in facilities that are accessible to people with disabilities. Upon reasonable request, the City will provide interpretation services 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 or via email to housing@cityofvancouver.us at least seven days prior to the meeting or hearing.

Public Notice, Comment Period and Public Hearing

The City conducts a minimum of two public hearings per year for CDBG and HOME programs. The Consolidated Plan and Action plan hearings are conducted in the spring and the Consolidated Annual Performance Evaluation Report (CAPER) hearing is conducted in the fall. Information regarding the time, location and subject of each hearing will be provided to community members at least two weeks in advance through public notice and outreach listed below.

Notices of public meetings, public comment periods, public hearings, substantial amendments, and the notification of the City of Vancouver's proposed and actual use of CDBG/HOME funds will be published in *The Columbian* and on the City's website at www.cityofvancouver.us/CDBG:

- At least 30 days before the submission to HUD for the Consolidated Plan, Action Plan, or a Substantial Amendment;
- At least 15 days before the submission to HUD for the CAPER.

Notice will also be made available on social media, including that of the City.

The notice shall include:

- Anticipated amount of assistance (including grants funds and program income);
- Description of activities;
- Estimated amount that will benefit people with low- and moderate-income;
- Summary of contents and purpose of the Action/Consolidated Plan; and
- List of locations where copies of the entire proposed plan may be examined.

To further encourage the attendance and participation of people with low to 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 people of color and non-English speaking people residing in the City of Vancouver;
- other organizations including businesses, developers, nonprofit organizations, philanthropic organizations, community-based and faith-based organizations;
- Interested parties on the City of Vancouver CDBG/HOME mailing list; and
- Social media sources utilized by the City.

During the public comment period, copies of the proposed plans will be available for review at Vancouver City Hall (415 W 6th Street), online at www.cityofvancouver.us/CDBG, and web links available through City social media. A reasonable number of free copies of plans and reports are available upon request. Reasonable accommodations will be made for non-English speaking people and for people with disabilities. For details contact the Housing 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, or via email to housing@cityofvancouver.us.

All public comments will be considered, and a summary of all comments will be included in HUD submissions. Written comments must be directed to: Housing Programs Manager, CDBG/HOME Program, City of Vancouver, PO Box 1995, Vancouver, WA 98668-1995, or submitted via email to housing@cityofvancouver.us.

Public hearings will be held during the public comment period prior to the submission of the proposed plan to HUD. 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 people with disabilities and assistance available for non-English speaking people. Those wishing to be regularly informed of meetings/activities can be added to the program mailing list.

Hearings are held in Council Chambers, Second Floor, Vancouver City Hall, 415 W 6th Street, in Vancouver, WA unless otherwise specified.

All public hearings and public meetings associated with the Consolidated Planning process will conform to the Washington Open Public Meetings Act.

Consolidated Annual Performance and Evaluation Report (CAPER)

The performance report on CDBG and HOME programs covered by the Consolidated Plan are prepared by the City for submission to HUD 90 days after the close of each program year (June 30). Draft performance reports will be made available to the public, program participants, service providers and partner agencies. The draft performance report will be available for comment and review for no less than fifteen (15) days, and any public comment received will be reported in an addendum to the final performance report submitted to HUD.

Substantial Amendments

A Substantial Amendment is defined as:

- A change in allocation priorities (any increase greater than 30 percent in an individual project budget) or a change in the method of distribution of funds;
- Carrying out an activity (including those funded exclusively with program income) not previously described in the Consolidated Plan or Annual Action Plan; or
- A change in the purpose, scope, or beneficiaries of an activity.

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 if the purpose, scope, and intended beneficiaries remain essentially the same.
- Project Budget Line-Item change - The transfer of 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, Community Participation Plan, or Section 108 Guaranteed Loan Application may not constitute a substantial amendment.

Emergency and/or Disaster Waiver

Upon determination of good cause, HUD 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 Community Participation Plan as follows:

1. A reduction in the public comment period for CPP, 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. Public notice may be provided by alternate means such as publication on the City website and direct email.
4. In-person public hearings will not be required.
5. Any other additional flexibility deemed necessary by HUD.

Program Year Schedule

July	Start of program year
September 3 rd or 4 th week	Public Hearing regarding the CAPER and annual amendments (15-day Public Comment period prior to submission of report to HUD)
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
April	Projects prioritized for funding and presented to City Council
May 1 st or 2 nd week	Public Hearing on Assessment of Fair Housing, Action Plan, and Consolidated Plan (30-day Public Comment period prior to submission to HUD)

Displacement

Displacement of people, businesses, nonprofits and/or farms by activities or projects funded through HUD entitlement programs is discouraged by the City. The City will take the following steps to minimize displacement:

1. Discourage projects involving displacement/relocation through a grant application scoring system that reduces the total score of projects that anticipate displacement/relocation;
2. Encourage project sponsors to plan or stage projects to minimize or prevent the adverse impacts of displacement;
3. Provide advisory assistance, measures, facilities, and services necessary to determine relocation needs, or other assistance for which displaced people or businesses may be eligible;
4. Coordinate code enforcement with rehabilitation and housing assistance programs; and
5. Encourage projects to stage 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.

If displacement is unavoidable, full benefits and assistance will be provided according to appropriate provisions of Uniform Relocation Act and its regulations at 24 CFR Part 24. Sponsors of projects that may involve displacement must submit a General Information Notice to every person or business impacted *at the point of application* for federal assistance. In addition, the project sponsor must submit a Relocation Plan to the City. Subsequent notices (type of notice and expected due date) to affected parties must be identified in the Plan.

Public Access to Information

The City of Vancouver shall provide community members, 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 and 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 and HOME program staff.

Copies of proposed plans will be available for review at City Hall (415 W 6th Street), online at www.cityofvancouver.us/cdbg, web links available through City social media formats, and hard copies mailed upon request. Reasonable accommodations will be made for non-English speaking persons and for people with disabilities. For details contact the Housing 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, or via email to housing@cityofvancouver.us.

Complaints

Complaints, inquiries, and grievances shall be submitted in writing to the Housing Programs Manager, CDBG/HOME Program, City of Vancouver, PO Box 1995, Vancouver, WA 98668-1995, or via email to housing@cityofvancouver.us. 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.