



City of Bellevue

Citizen Participation Plan

Community Development Block Grant
U.S. Department of Housing and Urban Development

Adopted by the Bellevue Human Services Commission
May 21, 2019

(This version supersedes prior versions of the Citizen Participation Plan)

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I. Introduction

In compliance with **24 CFR 91.105**, the City of Bellevue (the City) is required to adopt a Citizen Participation Plan. This Plan encourages resident engagement in the planning and evaluation of the Community Development Block Grant (CDBG) Program and outlines the process for public participation in annual CDBG planning; all are encouraged to participate.

The City of Bellevue Human Services Division conducts the planning and administration for the CDBG entitlement program. This Citizen Participation Plan sets forth the City's policies and procedures for citizen participation with respect to the following Consolidated Plan documents:

- Five-Year Consolidated Housing & Community Development Plan (Consolidated Plan)
- Annual Action Plan
- Consolidated Annual Performance and Evaluation Report (CAPER)
- Fair Housing Assessment

Code of Federal Regulations for Citizen Participation:

[24 CFR Part 91.105](#) Local Governments Citizen Participation

[24 CFR Part 91.100](#) Local Governments Consultation

[24 CFR Part 91.401](#) HOME Consortia

II. Development of the Consolidated Plan and Plan Amendments

The City welcomes public participation in the development of the Consolidated Plan and amendments to the Plan. Prior to the adoption of the Plan, the entitlement amount expected from HUD to the City, the range of activities that may be undertaken, and the amount of funding expected to benefit low/moderate-income persons will all be made available to the public.

III. Participation

Residents and stakeholders, including the Public Service agencies and Public Housing Authorities, will be provided with information and the opportunity to give meaningful input to the consolidated planning process.

A. Public Hearings

Public hearings will be held at least twice per year at key stages of the grants administration process to obtain the public's views and to provide the public with responses to their questions and comments. Public hearings refer to both public hearings and community meetings.

B. Public Notice

Residents must be given adequate notice of all public hearings and public meetings through posting on the City of Bellevue webpage and direct notification to stakeholders. Adequate notice is defined as 14 calendar days. Public notice shall indicate the date, time, location, purpose of the meeting, and information about the issues to be discussed.

C. Comment Period

The comment periods for plans and reports are listed in the following table and are described in more detail in Section IV.

Document	Comment Period
Consolidated Plan & Annual Action Plan	30 calendar days
Substantial Amendment to Consolidated & Annual Action Plan	30 calendar days
Fair Housing Assessment	30 calendar days
Citizen Participation Plan	30 calendar days
CAPER	15 calendar days

D. Access to Meetings

Meetings and forums shall be held in accessible locations to ensure that architectural barriers do not preclude the attendance of people who have a disability. In addition, accommodations will be made, upon request, for attendees who have hearing or visual challenges.

E. Language Access

The City of Bellevue shall take reasonable steps to provide language assistance to ensure meaningful access to participation by non-English speaking and limited English proficient residents of the community. The City will make arrangements to provide interpreters at public hearings, upon request. Any non-English speaking resident who wishes to participate may contact the Human Services Division prior to the hearing so that adequate arrangements can be made. Reasonable accommodations at the public hearing such as sign language interpretation or alternate formats for printed material are available for individuals with disabilities with a minimum of 7 days advance notice.

IV. Plans and Reports

The following section describes the key planning and reporting documents for the CDBG federal grant.

A. Consolidated Housing and Community Development Plan (Consolidated Plan)

The Consolidated Plan guides the use of federal CDBG funds for a five-year period. It describes the amount of assistance, priorities, range of activities, and estimated amount that will benefit low and moderate-income people.

B. Annual Action Plan (AAP)

The AAP outlines the specific programs and activities to be undertaken for the program year and the amount of funds that will be awarded to those projects. The program year begins January 1 and ends December 31.

C. Consolidated Annual Performance and Evaluation Report (CAPER)

The CAPER reports on the activities and projects undertaken and completed during the previous program year. This is completed and submitted to HUD no later than March 31.

D. Analysis of Impediments to Fair Housing (AI) or Assessment of Fair Housing (AFH)

In coordination with the Consolidated Plan process, the City prepares a community-wide analysis of impediments to fair housing. Annual progress and work towards the fair housing goals are reported annually in the CAPER.

E. Citizen Participation Plan (CPP)

The CPP (this subject document) is required by HUD regulations and outlines the means and methods that the City uses to encourage public input into the planning and review process for the CDBG program. It is updated as needed.

V. Amendments to the Consolidated Plan and Annual Action Plans

A. Amendments to the Consolidated Plan

The following descriptions and definitions of amendments apply only to formally adopted and approved plans. Any plans not yet approved by HUD are considered draft documents subject to changes without public review.

1. Revisions to the Consolidated Plan

Revisions are edits, updates or corrections that do not alter the activities, purpose or intended beneficiaries of any of the strategies adopted in the Strategic Plan sections. Revisions do not require public notice or HSC review. The revised Consolidated Plan will be published on the City's website.

2. Minor Amendments to the Consolidated Plan

Minor Amendments are those which alter the annual accomplishment goals of the major strategies in the strategic plan. Minor amendments must be reviewed and approved by the HSC. The amended Consolidated Plan will be published on the City's website.

3. Substantial Amendments to the Consolidated Plan

Substantial amendments are those which:

- a) Alter the activities, purpose or intended beneficiaries of a strategy identified in the Strategic Plan section of the Consolidated Plan;
- b) Add or delete a strategy in the Strategic Plan section;
- c) Alter the long-term goals of the major strategies in the strategic plan.

Substantial amendments require public notice and an opportunity for the public to comment for 30 days prior to the date set for the HSC meeting to take action on the substantial change(s) to the Consolidated Plan. Substantial amendments must be reviewed and approved by the HSC.

All comments that are submitted, either orally or in writing during the comment period, shall be considered in any substantial amendment to the Consolidated Plan. A summary of public comments made and how they influenced the amendment, as well as the reasoning for comments that were rejected and did not influence the amendment, will be attached to the substantial amendment. The City will submit the amended Consolidated Plan to HUD. The amended Consolidated Plan will be published on the City's website.

B. Amendments to the Annual Action Plan

After the AAP is submitted to HUD, changes to the AAP follow the processes described below. The City is responsible for providing citizens with reasonable notice and an opportunity to comment when amendments to the plan are proposed.

Modifications to the Annual Action Plan fall into three categories.

1. Revisions to the Annual Action Plan.

Revisions are minor changes that do not meet threshold criteria for amendments and do not require public notice or HSC review. The revised AAP will be published on the City's website.

2. Minor Amendments to the Annual Action Plan

Minor amendments are those which:

- a) Change more than 50 percent of the amount of CDBG funds awarded to a project.
- b) Change the intended beneficiaries of an activity.
- c) Change the purpose, scope, or location of an activity such that the estimated number of intended beneficiaries are impacted by 50 percent or more.
- d) Cancel or add a project or activity.

A minor amendment must be approved by the HSC and the amended AAP published on the City's web site.

3. Substantial Amendments to the Annual Action Plan

Substantial amendments are those which:

- a) Involve a modification in the amount of CDBG funds awarded by more than 35 percent of the annual entitlement grant amount.
- b) Change the use of CDBG funds from one eligible activity to another.

Substantial amendments require public notice and an opportunity for the public to comment 30 days prior to the date set for the HSC meeting to take action on the amendment. All comments that are submitted, either orally or in writing, during the comment period shall be considered in any amendment to the AAP. A summary of public comments made and how they influenced the amendment, as well as the reasoning for comments that were rejected and did not influence the amendment, will be attached to the amendment. The City will submit the substantial amendment to HUD. The amended AAP will be published on the City's website.

VI. Public Participation for the Fair Housing Analysis of Impediments (AI)/Assessment of Fair Housing (AFH) and Affirmatively Furthering Fair Housing

The preparation of an Analysis of Impediments to Fair Housing (AI) and its subsequent document, the Assessment of Fair Housing (AFH), are critical parts of HUD housing and community development programs, and citizen participation is key to the successful completion of these planning efforts. In order to maximize opportunity for public input into the process, City staff will make HUD-provided data and any other supplemental information to be incorporated into its AI or AFH available to its residents, public agencies, and other interested parties. Such data will be made available at, or as soon as feasible after, the start of the public participation process. The data may be made available to the public in a variety of formats and locations, both physical and electronic, including references to the data on HUD's website.

For purposes of the AI and/or AFH, the duty to “affirmatively further fair housing” means taking meaningful actions, in addition to combating discrimination, that overcome patterns of segregation and foster inclusive communities free from barriers that restrict access to opportunity based on protected characteristics. Specifically, affirmatively furthering fair housing means taking meaningful actions that, taken together, address significant disparities in housing needs and in access to opportunity, replacing segregated living patterns with truly integrated and balanced living patterns, transforming racially or ethnically concentrated areas of poverty into areas of opportunity and fostering and maintaining compliance with civil rights and fair housing laws.

Draft versions of the document will be published on the City’s website and will be available by request from the Human Services Division either via hard copy or email. The public will be notified of the availability of the AI/AFH in the local paper of record and via other methods such as email and social media. Notification will be sent to public housing authorities, human services agencies, and other interested parties. The public will be encouraged to review and comment on this document prior to its submission to HUD. The public will be provided 30 days within which to comment on the report. Citizen comments on the AI/AFH will be considered if they are received orally at a HSC meeting or submitted in writing within the 30-day period for comment. The AI/AFH will be reviewed and approved by the HSC.

The City shall consider any comments or views received in writing or orally at a HSC meeting when preparing the final AI/AFH. A summary of these comments or views, and a summary of any comments or views not accepted and the reasons why, shall be attached to the final AI/AFH.

VII. Public Comment on the Annual Performance Report (CAPER)

The City is required by HUD regulations to report annually on its performance in implementing the activities of the Consolidated Plan. This takes place via the Consolidated Annual Performance Evaluation Report (CAPER). The public will be notified of the availability of the CAPER in the local newspaper of record and will have the opportunity to comment on this document prior to its submission to HUD. The CAPER will generally be available in March of each year. The public will be provided 20 days to comment on the report. The CAPER must be submitted to HUD by March 31.

VIII. Access to Records

Records relevant to the consolidated planning process and program administration are available for the preceding six years. Citizens, public and private agencies, and other interested parties will be given reasonable and timely access to information and records related to the Consolidated Plan and program activities.

IX. Anti-Displacement and Relocation Policy

Applicants are encouraged to propose projects that avoid or minimize displacement. Projects that include or that will include federal funding (CDBG), and will acquire, demolish, or rehabilitate a building that has residential or commercial tenants in place, must follow the federal relocation requirements of the Uniform Relocation Act (URA) and the Real Property Acquisitions Regulations for Federal and Federally Assisted Programs, as well as the Barney Frank Amendment, Section 104(d), if applicable.

X. Technical Assistance

Technical assistance will be made available to groups representing low- and moderate-income persons who request assistance in commenting on the AI/AFH or in understanding the requirements for developing proposals and preparing applications under the Consolidated Plan and the Annual Action Plan.

XI. Complaint Review Process

The City will provide a timely, substantive, written response to every written resident complaint within 15 working days. A complaint pertaining to the CDBG Program, Consolidated Plan, Annual Action Plan, any plan amendments and/or the performance report may be submitted for response to Human Services staff. Staff will review the complaint and will provide a response within a period of 15 working days of receipt of any complaint. A written appeal of a response may be requested of the Human Services Manager who will review and provide a written response within 21 days. The Human Services Manager's decision will be final.