



## **CITY OF BOISE, IDAHO**

### **CITIZEN PARTICIPATION PLAN**

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## **INTRODUCTION**

The City of Boise (City), as an entitlement community, is eligible to receive Community Development Block Grant (CDBG) and Home Investment Partnerships Program (HOME) funds from the U.S. Department of Housing and Urban Development (HUD). This Citizen Participation Plan (Plan) provides for and encourages citizen participation in the CDBG and HOME programs. This Plan is an essential element of the City's community development process and has been developed to comply with the regulations of the CDBG and HOME programs as administered by HUD.

This Citizen Participation Plan for the City is designed to provide all citizens adequate opportunity to participate in the planning, implementation, and assessment of the CDBG and HOME programs. The Plan sets forth policies and procedures for citizen participation, which are designed to maximize the opportunity for citizen participation in the process, with special emphasis on encouraging participation by persons of low and moderate income and residents of areas where community development funds are utilized.

## **OBJECTIVES**

Subject to federal requirements, CDBG is used for a variety of housing and community development programs and activities with the objective of providing decent housing, a suitable living environment and expanded economic opportunities that benefit low and moderate income persons in the City. HOME program funds are provided by HUD to carry out activities that increase the supply of decent affordable housing to low and moderate income households, expand the capacity of non-profit housing providers, strengthen the ability of state and local governments to provide housing and leverage private sector participation in the provision of decent affordable housing.

The primary objectives of the City's Five-Year Consolidated and Citizen Participation Plans are to:

- Encourage citizen participation in the development of the Five-Year Consolidated Plan, the Annual Action Plan and the Consolidated Annual Performance and Evaluation Report with emphasis on participation from individuals and households identified as low to moderate income, residents of slum and blighted areas, minorities, those with limited English proficiency, the disabled and those residing in areas where funding will be utilized.
- Provide citizens with reasonable and timely access to meetings, information and records relating to the City's plan for utilizing funding in addition to allowing reasonable opportunity to comment on the Five-Year Consolidated Plan, the Action Plan, the Citizen Participation Plan and the Consolidated Annual Performance and Evaluation Report.
- Provide technical assistance to groups representative of persons of low to moderate income and of minority populations that request such assistance in developing proposals for funding. As a condition of providing technical assistance, the City requires that the activities to be addressed in a proposal be consistent with identified community

development and housing needs and funding program guidelines, and that funds be available for such activities as may be involved.

- Provide public hearings to obtain citizen views and to provide the City's responses to proposals and questions at all stages of the community development program. Public hearings provide for citizen input on community needs, review of proposed uses of funds, and to assess how funds were spent during previous program year.
- Provide substantive written response to every written citizen complaint within fifteen (15) working days of receiving statement (where practicable).
- Endeavor to meet the needs of non-English speaking and Limited Language Proficiency (LEP) residents in the case of public hearings where a significant number of non-English speaking and/or LEP residents can be reasonably expected to participate. When requested no later than five (5) business days prior to a public hearing, appropriate provisions will be determined and made that may include translation of public hearing comments and documents into the language of the majority of the non-English speaking or LEP residents affected.
- Provide public hearings at locations accessible to persons with disabilities, and make provisions for persons with disabilities when requests are made at least five (5) business days prior to the hearing.

## **COVERED PROGRAMS**

This Citizen Participation Plan is to establish policies and framework in which citizens are provided the opportunity to review and respond to proposals for the use of federal block grant funds, evaluate program performance and receive technical assistance in application development. Appropriately planned and implemented, this plan will promote citizen participation in the preservation and revitalization of neighborhoods throughout the City employing the following programs:

- Community Development Block Grant Program: The Community Development Block (CDBG) Program is authorized under Title I of the Housing and Community Development Act of 1974, as amended. The CDBG program was enacted in 1974 under the Housing and Community Development Act or HCDA. Prior to this point in time, there were numerous federal programs which addressed community development issues.

The primary objective of Title I of the Housing and Community Development Act of 1974, as amended, is the development of viable urban communities. These viable communities are achieved by providing the following, principally for persons of low and moderate income:

- Decent Housing;
- A suitable living environment; and
- Expanded economic opportunities.

To achieve these goals, the CDBG regulations set forth eligible activities and the national objectives that each activity must meet. As a recipient of CDBG funds, the City is charged with ensuring that these requirements are met.

- Home Investment Partnerships Program: The Home Investment Partnerships (HOME) Program was created by the National Affordable Housing Act of 1990 (NAHA), and has been amended several times by subsequent legislation. The intent of the HOME program is to:
  - Provide decent affordable housing to lower income households;
  - Expand the capacity of nonprofit housing providers;
  - Strengthen the ability of state and local governments to provide housing; and
  - Leverage private sector participation.

HOME funds are allocated by formula to participating jurisdictions (PJs). PJs are state and local governments that receive funds to operate the HOME program. The City as a PJ utilizes HOME funds to provide housing assistance to low and moderate income households for homebuyer acquisition, housing rehabilitation, tenant-based rental assistance (TBRA) and financing of rental housing construction.

## **CITIZEN PARTICIPATION REQUIREMENTS**

The planning and reporting activities associated with the CDBG and HOME programs that require public participation are as follows:

- Five-Year Consolidated Plan: The City every five years develops a new Housing and Community Development Consolidated Plan (Consolidated Plan) in accordance with the citizen participation requirements in 24 CFR 91.105 of the Consolidated Submission Community Planning and Development Programs; Final Rule.

The City will provide a thirty (30) day period to receive comments from citizens on the proposed Consolidated Plan. The City will consider and respond within fifteen (15) business days to any comments received, whether submitted electronically, in writing, or orally at public hearings, in developing the final Consolidated Plan. A summary of these comments, whether used in the final plan or not, and the City's response to these comments will be included in the final Consolidated Plan.

The Consolidated Plan, which is in place from October 1, 2011 through September 30, 2016, is available online at <http://www.cityofboise.org/Departments/PDS-HCD/Documents/page51603.aspx> or a copy can be requested from the City of Boise's Housing and Community Development Division.

- Annual Action Plan: The City of Boise is required to submit an Annual Action Plan (Action Plan) describing the programs and services funded in each year of the Consolidated Plan. The 2011 Action Plan and each subsequent Action Plan is due to HUD by August 15 of each year and represents the application for continued CDBG and HOME funding initially requested by the Consolidate Plan. This annual planning and reporting activity is essential to ensure that funds are allocated efficiently and to allow flexibility for shifting priorities over the period covered by the Consolidated Plan.

While the Mayor and City Council retain the final authority and responsibility for the manner in which CDBG and HOME funds are used in the community, the comments and suggestions of citizens as well as those of the Housing and Community Development Citizens Advisory Committee are carefully considered when determining which activities the City will assist.

- Consolidated Annual Performance and Evaluation Report: The Consolidated Annual Performance and Evaluation Report (CAPER) is a self-assessment of the implementation of the Consolidated Plan and the Action Plan. Activity accomplishments are reported showing the effectiveness of the CDBG and HOME funds through the numbers and demographics served in the community.

The City will provide for a fifteen-day public review and comment period for citizen input on the CAPER. A summary of all comments received will be included in the final CAPER, which is due to HUD ninety (90) days from the end of the program year.

## **PARTICIPANTS IN THE HOUSING AND COMMUNITY DEVELOPMENT CITIZEN PARTICIPATION PLAN**

The development of the Consolidated and its annual Action Plan components is a collaborative effort of numerous individuals, organizations and agencies. The City's Housing and Community Development Division provides staff support to develop the Consolidate Plan and each Action Plan.

- Individual Citizens: The participation of individual citizens is the foundation of the housing and community development programs within the City. Reasonable efforts are made to ensure all citizens are aware of public hearings, planning meetings and citywide events that involve the development of the Consolidate Plan and each Action Plan.
- Community Outreach for Minority Residents: Organizations involved the development of the Consolidated Plan and each Action Plan will include advertisement in minority media, contact with leaders of minority community organizations and distribution of outreach materials at events sponsored by minority community organizations.
- Public Housing Authority, Organizations and Agencies: The Boise City/Ada County Housing Authority, as well as other organizations and agencies involved in the development and implementation of activities to assist low income citizens will be contacted to advise them of the Consolidate Plan and Action Plan process. These organizations and their clients will be encourage to participate in the development of the Consolidate Plan and each Action Plan.
- Boise City Housing and Community Development Citizens Advisory Committee: The Boise City Housing and Community Development Citizens Advisory Committee (Advisory Committee) is the citizen body that reviews, prioritizes and make recommendations to the Mayor and City Council on the contents the Consolidated Plan

and each Action Plan including activities within. The Advisory Committee consists of not fewer than five (5) members appointed by the Mayor with the confirmation of the City Council. Two (2) members shall be active in the business of development, banking, or real estate and at least two (2) members shall be active in private not for profit organizations or public agencies serving the communities economically disadvantaged citizens.

The Advisory Committee assists the City in reviewing applications for CDBG and/or HOME program funding and provides recommendations for programs and/or projects to receive CDBG and/or HOME program funding. The Mayor and City Council will approve or modify the recommendations and direct the Housing and Community Development Division to prepare a draft Action Plan. After a public comment period of thirty (30) days, the proposed Action Plan is presented to Mayor and City Council for final review and adoption.

- Mayor and City Council: The Mayor and City Council is the final policy body that reviews and takes action on the Consolidated Plan and/or Action Plan. After receiving, the Consolidated Plan and/or Action Plan, the Mayor and City Council considers and then votes on the proposed Consolidated Plan and/or Action Plan before the plan and/or plans are present to the citizens for comment. After receipt and consideration of citizen comments, the Mayor and City Council approves the final Consolidated Plan and/or Action Plan. Once approved by Mayor and City Council the Consolidated Plan and/or Action Plan are presented to HUD.

## **COMMUNICATIONS, COOPERATION AND COLLABORATION**

The development of the Consolidated Plan and each Action Plan takes place over several months, with citizen participation encouraged in all phases by an all-inclusive communication effort. The City's Housing and Community Development Division coordinates the communication efforts that include but are not limited to the following components:

- Minority Outreach: Conduct outreach announcing all public hearings to organizations that represent minorities and organizations that represent persons with disabilities at least five (5) business days prior to the date of each hearing.
- Language Interpreter: Include a statement in all notices of public hearings indicating that participants in the hearing may request a language interpreter to assist in their participation in the hearing by contacting the Housing and Community Development Division during scheduled office hours, Monday through Friday between 8:00 a.m. and 5:00 p.m., at least five (5) business days prior to a hearing date.
- Accessible Locations: Include a statement in all notices of public hearings indicating that locations are accessible to persons with physical disabilities.
- Reasonable Accommodations: Include a statement in all notices of public hearings indicating that participants may request reasonable accommodations from the City to facilitate their participation in the hearing by contacting the Housing and Community



Development Division during scheduled office hours, Monday through Friday between 8:00 a.m. and 5:00 p.m., at least five (5) business days prior to a hearing date.

- **Translation:** Notify organizations representing minorities that every reasonable effort will be made to translate the Citizens Participation Plan, Consolidated Plan, Action Plan and CAPER into other languages upon request.
- **Alternate Formats:** Notify organizations representing persons with disabilities that every reasonable effort will be made to provide the Citizens Participation Plan, Consolidated Plan, Action Plan and CAPER in a format accessible to person with disabilities upon request.
- **Training and Technical Assistance:** Provide educational sessions on the CDBG and HOME programs and processes to organizations representing minorities and/or persons with disabilities.
- **Committee Vacancies:** Notify organizations representing minorities and /or person with disabilities of vacancies on the Advisory Committee.
- **Mailing Lists:** Maintain a community partners' mailing list and/or e-mail list for use in distribution of flyers, public hearing announcements, and so forth.
- **Publicity:** Contribute articles and notices about the Housing and Community Development Division's process to community newspapers.
- **Citywide Media-based Communication:** The use of media and other publicity efforts are planned to include newspaper notices of public hearing dates, time and locations. A newspaper notice will give the amount of funds the City expects to receive and the range of activities that will be undertaken with these funds. This notice will give the estimated percentage of proposed CDBG and HOME funds that will be used for activities that benefit low and moderate income citizens.
- **Availability and Review of the Consolidated Plan and Action Plan Drafts:** The Citizen Participation Plan provides for a thirty (30) day public review of the Consolidated and Action Plan drafts prior to submission to the Mayor and City Council for final approval and adoption. The beginning and ending dates for the thirty (30) day public comment period will be published in a notice with The Idaho Statesman a newspaper of general circulation.

## **STAFF SUPPORT AND TECHNICAL ASSISTANCE**

Housing and Community Development Division staff support is an important element of the Citizen Participation Plan. To guarantee citizen participation in the development of Action Plans, the Housing and Community Development Division will make every reasonable effort to respond to requests from agencies requiring technical assistance to develop project proposals. In addition, staff works directly with the Advisory Committee to convey community development information, setup meetings, make telephone calls, facilitates communication concerning project implementation, and so forth.

## **ACCESS TO RECORDS**

The Housing and Community Development Division will provide citizens, public agencies and other interest parties' reasonable and timely access to information and records relating to the City's Consolidated Plan, Action Plans and CAPERs in accordance with federal regulations,

Idaho State statutes and City policy. The City may from time to time enter into public/private partnerships utilizing federal program, i.e. loans and grants that required the submission of proprietary business information to document the financial conditions of the proposed loan or grant. Such proprietary business information may be exempted from disclosure under certain conditions.

The City may charge a fee for copies to recover the cost of materials and operations. In addition, the City will require an appointment to view records and may assign a Housing and Community Development Division staff member to be present during the inspection of records.

### **ASSESSMENT OF PERFORMANCE**

Citizens and citizen organizations have the following opportunities to submit comments on all aspects of the City's housing and community development performance:

- Public hearings and public comment periods;
- Correspondence to the Advisory Committee;
- Correspondence or verbal comment to the Housing and Community Development Division during the allocation process, implementation phase and/or after completion of the projects; and
- Neighborhood meetings - a minimum of three (3) conducted during the planning period for the Consolidated Plan.

### **AVAILABILITY OF PUBLIC INFORMATION**

The Housing and Community Development Division office will be open Monday through Friday from 8:00 a.m. to 5:00 p.m., except during legal holidays, in order to allow citizens the opportunity to inspect public file and records related to the activities receiving CDBG and HOME program funding.

Housing and Community Development Division staff will be available to provide interested citizens with information concerning the following:

- Total amount of CDBG and HOME funds expected to be available for use;
- List of proposed activities to benefit low and moderate income persons using CDBG and HOME programs funding;
- List of proposed activities likely to result in displacement and the City's plans for minimization of such displacement; and
- Types and levels of assistance the City will provide to persons displaced by CDBG and/or HOME programs funded activities.

### **PUBLIC HEARINGS**

The City will conduct at least two (2) public hearings annually and will conduct onsite information gatherings and community awareness meetings at local area homeless shelters and other social service agencies serving the needs of low and moderate income individuals. In

addition, three (3) additional neighborhood meetings will be conducted during the preparation of the Consolidated Plan.

Public hearings will be advertised community-wide at least two (2) weeks in advance, in order to allow interested parties to express their views or respond to proposals or questions related to the CDBG and HOME programs.

Public hearings will be held at the City's Housing and Community Development Division office site, located at 1015 South Capitol Boulevard or another public facility which provides for the adequate access of individuals with mobility impairments, at a time which is convenient to potential and actual beneficiaries of the programs. Participants requesting reasonable accommodations from the City to facilitate participation in a public hearing or requiring further information may call or write the Assistance Program Administrator at (208) 384-4158, 1025 South Capitol Boulevard, Boise, ID, 83706. Individuals who are deaf, hard of hearing or have speech disabilities with others may contact the Assistant Program Administrator at (208) 384-4158 through the Idaho Relay Service at 7-1-1. Please contact the Housing and Community Development Division during scheduled office hours, Monday through Friday between 8:00 a.m. and 5:00 p.m., at least five (5) business days prior to a hearing date.

One (1) of the two (2) public hearings will be conducted prior to the City's submission to HUD of the required CAPER. This public hearing will provide an opportunity for citizens to comment on the performance of the City during the previous year in carrying out the activities specified in the Consolidated Plan. At least fifteen (15) days prior to this public hearing, the City will make available copies of the CAPER for citizen review and comment.

The City will consider all comments or views of citizens received in writing or orally at the public hearing and a summary of the comments or views will be attached to and submitted with the performance report.

The second of the two (2) annual public hears will be conducted no less than sixty (60) day before the proposed Consolidated Plan is initially published for comment. This public hearing will provide an opportunity to obtain the views of citizens on housing and community development needs and to develop proposed activities for inclusion in the yearly Action Plan.

### **APPLICATIONS FOR COMMUNITY DEVELOPMENT BLOCK GRANT AND/OR HOME PROGRAMS FUNDING**

The application process for CDBG and/or HOME programs funding will officially open during the public hearing conducted to obtain the views of citizens on housing and community development needs within the community.

- Public Service Application Process: Activities in this funding category are limited to no more than fifteen percent (15%) of the annual CDBG entitlement allocation. Public service applications will be accepted, reviewed, ranked and funded on a bi-annual basis by the Advisory Committee, commencing with Program Years 2011 and 2012.

Historically, the majority of public service applications come from community groups and non-profit agencies that provide services to low and moderate income clients (e.g. homeless services, domestic violence counseling, or emergency rental assistance).

The Advisory Committee will meet to review and rank the public service applications. The meeting dates will be published in The Idaho Statesman and are considered open public meetings. Public service applicants may be invited by the Advisory Committee to present their project during the scheduled meeting dates. After the presentation, the Advisory Committee may comment and ask questions of the applicant to ensure they have the necessary information to judge the merits of the project.

The final scheduled Advisory Committee meeting determines which public service applicants will receive CDBG funding and how much will be allocated based on the review and total score of each application.

- During the second year of funds, if HUD should reduce or increase the total federal funding of the CDBG program, the percent of the change will be distributed equally among all subrecipients granted public service funds.
- **Non-Public Service Applications:** Activities funded in this category account for the majority of the total of CDBG and HOME programs entitlement funding. The types of project generally funded include tenant-based rental assistance, homeownership, housing rehabilitation, community facilities, public infrastructure and economic development. Due to the nature of the work, non-public service activities are most often administered or facilitated by the City.
  - Non-public service funding is available to outside organizations.

Allocation of non-public service funds involves an internal City process to determine viable project priorities with assistance from the Advisory Committee upon request. The funding commitment for non-public service project will be determined by the type, size and scope of the project. For example, large construction activities may have a multi-year funding commitment to focus CDBG and/or HOME funds in a high priority area.

- The City's Housing and Community Development Manager will make the final recommendations for Mayor and City Council approval and adoption.
- For projects with multi-year funding, if HUD should reduce or increase the total federal funding of the CDBG and/or HOME programs, the Housing and Community Development Manager will determine if the change will be distributed to one or all of the funded projects.

## **RESPONSE TO COMPLAINTS AND GRIEVANCES**

The City, through the Housing and Community Development Division, will answer in a timely and responsive manner to written complaints and grievances related to the CDBG or HOME

programs. Staff will make every reasonable effort to provide written responses within fifteen (15) days.

When writing a complaint, citizens should provide enough information to permit an investigation. The complaint should be clear, concise and include the following information:

- Identification of the project and project location;
- The reason for the complaint (hearsay and innuendo will not be considered valid);
- Sufficient data to substantiate any claims or charges. If possible, supporting documentation should be included; and
- If desired, citizens may propose a solution or remedy to the problem.

Complaints and grievances shall be first filed with the project sponsor if the complaint or grievance is related to an activity or project initiated with a subrecipient. A copy of the complaint or grievance should also be filed with the City's Housing and Community Development Division. Subrecipients must make every reasonable effort to provide written responses within fifteen (15) days (where practical), and forward a copy of the response to the City's Housing and Community Development Division.

If the complainant feels the response from the subrecipient or project sponsor is unsatisfactory, he or she may appeal to the City's Housing and Community Development Manager to review the complaint for resolution. Additional information may be requested at that time. Every reasonable effort will be made to provide written responses within thirty (30) days (where practical).

If valid and sufficient data has been provided to substantiate the complaint, an investigation will be conducted. The extent of an investigation depends on the scope and depth of the issues involved. Some investigations may include examining a set of circumstances; others may involve examining local policies and practices.

### **CRITERIA FOR AMENDMENTS TO THE ACTION PLAN/CONSOLIDATED PLAN**

24 CFR 91.105 (c) of the Consolidated Submission Community Planning and Development Programs; Final Rule requires that grantees of CDBG and HOME programs make public the criteria the City will use for determining what changes in the planned or actual activities constitute a substantial amendment to the Consolidated Plan. An amendment to the approved Action Plan will occur when the City plans not carryout a project or activity described in the Action Plan, plans to carryout a project or activity not previously described, or plans to substantially change the purposed, scope, location or beneficiaries of a project or activity.

In accordance with these requirements, the City will consider a change of the purposed, scope, location, or beneficiaries of a project or activity to be substantial under the following conditions:

- A requested increase or decrease in the budgeted amount for a project or activity exceeds 85% of the original budgeted amount;

- When a project or activity previously described in the Action Plan will not be carried out; or
- When a new project or activity is proposed that is not currently identified in the Action Plan.

Upon the determination that an amendment to the Consolidated Plan and/or Action Plan is necessary and consistent with the amendment criteria established herein, the City shall publish a summary of the proposed amendment in The Idaho Statesman to provide an opportunity for affected citizens to comment on the proposal for a period of thirty (30) days.

### **SUMMARY**

The City has developed its Citizen Participation Plan in order to provide for and encourage citizen participation with particular emphasis on participation by persons of low and moderate income, residents of slum and blighted areas, and of areas in which CDBG and HOME funds are proposed. This Plan will be amended as required by the regulations governing the CDBG and HOME programs or as deemed necessary by the City's Housing and Community Development Division.