

CITY OF TACOMA

PARTICIPATION PLAN FOR HOME, CDBG, AND ESG PROGRAMS

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Intro

In Tacoma, community participation has always been strong, but often this participation has not fully represented all of Tacoma's residents, such as low income, the elderly, minorities, persons with disabilities, youth or persons with limited English proficiency. However, Tacoma's city government and its residents are committed to the growth of Tacoma as a pleasant, safe and united community for all its residents and believe this goal can best be met by increasing opportunities for 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 and annual action plans for the use of these funds. The Consolidated Plan includes 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 residents in developing the Consolidated Plan, any substantial amendments to plans, and providing feedback on the annual performance report. The City particularly encourages the participation of low-income persons, persons living in low- and moderate-income neighborhoods (neighborhoods with 51% or more at 80% or lower of area median income), 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. The City engages with and provides information to community-based representative groups to encourage participation from minorities, non-English speaking persons, and persons with disabilities. 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 Participation Plan (the Plan) was initially adopted to encourage involvement in the CDBG Program and was subsequently amended to provide an ongoing mechanism for widespread 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 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 Plan to include a new section to facilitate the participation of residents with limited English proficiency. This new section was 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 also updated 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 shortened 5-day public comment period on substantial amendments to the Annual Action Plan for 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.

In 2024, City Council will review an amendment to update the previous Participation Plan for HOME, CDBG, and ESG Programs. This amended plan will streamline the substantial amendment process as well as language access.

Purpose

The purpose of the Plan is to inform residents of opportunities to express their needs and priorities for community improvements and to participate in planning for needed improvements. Additionally, this Plan provides for representation of all of Tacoma's residents by allowing them to have a voice in the decision-making process. Residents are provided an opportunity to participate in the development process for the following plans and reports for affordable housing, community and economic development that guide the City's use of HOME, CDBG, and ESG funds:

1. The Consolidated Plan
2. The Annual Action Plan
3. The Consolidated Annual Performance and Evaluation Report,
4. Fair Housing Plan, and
5. Substantial Amendments to Consolidated Plans and/or Annual Action Plans

Background

The City encourages residents 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. This Participation Plan outlines the opportunities available to residents to participate in improving opportunities for decent housing, a suitable living environment, and economic development, particularly for low- and moderate-income persons.

On the citywide level, several committees are appointed by the City Council to provide advice and input into the process of developing and implementing the Consolidated Plan and Annual Action Plans. These advisory committees, to the extent possible, include low- and moderate-income persons, representatives of community groups, and members of minority groups. The following groups and committees all provide input on housing and community development needs and strategies:

- The Human Services Commission (HSC) reviews applications for funding and/or funding recommendations from Neighborhood & Community Services (NCS) Department staff for ESG funding and human service programs supported with CDBG public services funding for City Council approval. HSC membership must reflect the diversity of our community as to race and culture, gender, age, socioeconomics, geography, and interest in Commission membership. The HSC is supported by staff from the NCS Department.

- The Tacoma Community Redevelopment Authority (TCRA) develops the Funding Priorities Statement for its programs and activities. 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 TCRA's board is composed of professionals from the lending, construction, real estate, accounting and legal fields. The TCRA is supported by staff from the Community and Economic Development Department.
- The Tacoma/Lakewood/Pierce County Continuum of Care (CoC) is the local planning body for homeless services. As a result, NCS staff present CDBG Public Services and ESG allocation recommendations to the CoC for their feedback (in accordance with 24 CFR 91.100).

Planning Activities

A. Five Year Consolidated Plan

The City of Tacoma's Consolidated Plan is developed through a collaborative process where the community establishes a unified vision of Tacoma's community development actions. The development of the Consolidated Plan includes the following steps:

1. At least one public hearing is held during the beginning of the planning process, to gather information from and share information with community members. Comments will be accepted during the public hearing.
 - a. A notice of the public hearing will be published in a newspaper of general circulation.
2. Consultation with numerous City and community partners (including the Community and Economic Development [CED] Department, NCS Department, city officials, public agencies, public housing authorities, housing developers and providers, community groups, service providers) and residents.
3. A draft Consolidated Plan will be available for public comment during a 30-day comment period. During the comment period, a public hearing will be held. Free copies of the draft Consolidated Plan will be made available for review in Tacoma Public Library branches, the offices of CED and NCS, and the City's website. A summary of comments received will be incorporated into the final Consolidated Plan.
 - a. A notice for the public comment period and public hearing will be published in a newspaper of general circulation. Instructions for submitting public comments will be included in the notice.
 - b. For the CARES Act or crisis response, a 5-day comment period is permitted regarding all funds associated with the act and responding to community impacts due to COVID-19 or other crisis declarations.
4. After the comment period ends, the final plan will be presented to City Council for approval prior to the submission of the plan to HUD.

B. Annual Action Plan

The Annual Action Plan serves as the one-year spending plan for the HOME, CDBG, and ESG programs. It is developed using the following process:

1. At least one public hearing is held during the beginning of the planning, to gather information from and share information with community members regarding the amount of funds expected to be available, the range of activities that will be considered, and an estimate of the amount of funds that will benefit low-income persons. Comments will be accepted during the public hearing.
2. Through the Annual Action Plan Process, the City Council will allocate CDBG and HOME funds to support affordable housing and/or the economic development programs administered by TCRA. The TCRA will invite developers to submit proposals to the TCRA. Housing proposals are then reviewed, and funds awarded by the TCRA. The TCRA will also conduct an open application process for funding economic development activities.. These activities will also be reviewed and fund awarded by the TCRA. The TCRA may also choose to directly acquire and redevelop real property for housing or economic development activities using HOME or CDBG funds, or directly allocate those funds to a project without an RFP being used. Through the annual planning process, the City Council will also allocate funds directly to TCRA for their operation of direct housing programs such as homeowner rehabilitation and down payment assistance.
3. All CDBG Public Services and ESG funding recommendations are developed by NCS staff by competitive funding processes or direct allocations. Recommendations are then presented to the HSC and CoC (in accordance with 24 CFR 91.100) prior to being presented to the City Council. The final decision for CDBG Public Services and ESG funding recommendations is made by the City Council.
4. A draft Annual Action Plan will be available for public comment. Free copies of the draft Annual Action Plan will be made available for review in Tacoma Public Library branches, the offices of CED and NCS, and the City's website. A summary of comments received will be incorporated into the final Annual Action Plan.
 - a. A notice will be published in the newspaper of general circulation that the public can submit comments during a 30-day period indicated in the notice.
 - b. For the CARES Act or crisis response, a 5-day comment period is permitted regarding all funds associated with the act and responding to community impacts due to COVID-19 or after crisis declarations.
5. After the comment period ends, the final plan will be presented to City Council for approval prior to the submission of the plan to HUD.

C. Fair Housing

The City of Tacoma is responsible for producing an Analysis of Impediments to Fair Housing Choice. The report details the barriers that have been identified, contributing factors, and recommendations for future action. As part of this process, HUD mandates that the City report on progress made towards closing out any identified barriers annually, as part of the Consolidated Plan, in the Consolidated Annual Performance and Evaluation Report (CAPER).

The Analysis of Impediments to Fair Housing Choice is updated during the development of the five-year Consolidated Plan. Stakeholder input and feedback is collected to update the report at the same

time as the Consolidated Plan engagement process. There are no formal comment periods or required approval processes for the Analysis of Impediments to Fair Housing Choice.

D. Consolidated Action Plan Evaluation 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. Residents 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.

Amendments

Throughout the year, changes may be necessary to the Consolidated Plan or the Annual Action Plan. Changes to the plan fall into two categories; Substantial and Non-substantial.

A substantial amendment is defined as:

1. A funding increase of more than 30 percent unless the change is less than \$100,000, or
2. A reduction of 30 percent or more in project beneficiaries (i.e., income groups, ethnic groups, limited clientele groups, residents of a targeted area), or
3. A determination is made by the Director of either CED or NCS that the change is substantial, even if it falls below the standards in numbers 1 and 2 above.

When plans or projects are substantially changed, the HSC and/or TCRA are notified and consulted for comments or recommendations. A notice of the proposed change is published in a newspaper of general circulation, which will include the dates for the 30-day comment period (or 5 days if the amendment is responding to impacts of COVID-19 or other emergency declarations) prior to implementation. The HSC and/or TCRA allow for public comment at a regularly scheduled meeting before acting on a substantial amendment. The summary or comments and why comments were accepted or rejected will be attached to the amendment prior to its submission to HUD.

The TCRA provides final approval for substantial amendments under the purview of housing and community and economic development activities and programs. The HSC forwards recommendations for substantial amendments under the purview of human services activities and programs to the NCS director for approval. Outside of these scopes, the NCS and/or CED director will provide final approval for substantial amendments.

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.

Contingencies

TCRA may select alternate projects during a funding cycle to be implemented if a previously 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 will be reallocated for a future round of funding.

NCS may recommend alternate projects during a funding cycle to be implemented if a previously 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 will be reallocated for a future round of funding.

Public Meetings and Hearings

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.

Public Hearings

The City holds at least two public hearings each year related to HOME, ESG, and CDBG funds. A public hearing is held by the TCRA at the beginning of the planning process to allow residents and applicants the opportunity to identify needs and priorities and comment on prior performance. Another public hearing will be held by City Council during the Consolidated Plan and/or Annual Action Plan adoption process giving citizens and applicants an opportunity to comment on the proposed plan.

Residents and applicants will be notified of the dates, times, places, and procedures of public hearings through newspaper advertisements and/or via email. Public hearings may be held virtually, in-person, or hybrid. When a hearing has an in-person component the physical location must be a facility that is accessible to physically disabled persons. Virtual hearings are close-captioned and amplified hearing devices are available for the hearing impaired.

Public Meetings

Additional meetings may be held as part of the application processes for funds that are included in the Consolidated Plans or Annual Action Plans. Meetings may be held virtually, in-person, or hybrid. When a meeting has an in-person component the physical location must be a facility that is accessible to physically disabled persons. Virtual hearings are close-captioned and auxiliary aids are available.

Residents and applicants will be notified of the dates, times, places, and procedures of public meetings through newspaper advertisements and/or via email.

Public Review of Documents

Draft Consolidated Plans, Annual Action plans and any substantial amendments are published prior to approval to allow time for the public to review and provide comment. Notification of the opportunity to review and/or comment on a draft plan or substantial amendment is provided by an announcement in a general circulation newspaper. Residents are given 30 calendar days to provide comment on the draft plan (or 5 days if the amendment is related to COVID 19 or an emergency declaration). During the review and comment period, copies of the plan are made available online at

the City of Tacoma website, CED and NCS offices, and Tacoma Public Library branches.

Access to Records

All public records, as defined by the State Public Disclosure Act, are available for review in the offices of the CED Department and the 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 residents.

Limited English Proficiency

The City of Tacoma is a diverse community, with a significant population of foreign-born residents as well as limited English speakers. Residents who do not speak English as their primary language or who have limited ability to speak, read, write or understand English may receive language assistance related to participation in the planning, programming, and implementation of federal CDBG, HOME and/or ESG grant programs by the City of Tacoma. In providing such language assistance, the City will take 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.

Summary information from the Consolidated Plan, Annual Action Plan, or Consolidated Annual Performance Evaluation Report may be made available in multiple languages upon request. Community members may contact the CED Housing Division for assistance at cedhousing@cityoftacoma.org.

Notices of public hearings will be provided to agencies serving non-English speaking residents of the city. Upon request and when feasible, the City may have translation services available during the public hearings. Interested residents must notify CED or NCS 72 hours in advance of the scheduled hearing of the type of translation services needed.

The provision of the language assistance shall be implemented by the CED Department and/or the NCS Department.

Technical Assistance

Any resident, public agency, housing developer, provider, or other funding applicant may contact CED or NCS for technical assistance. Staff provides technical assistance to 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 Participation Plan and other program requirements so they can effectively participate in the Consolidated Plan and Annual Action 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, community 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, as applicable, will help the HSC and TCRA in obtaining any information or assistance they need to make their recommendations and decisions.

Complaints

All written 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 working days, where practicable. All complaints and responses will be kept on file.

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 an 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 community/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.

Effective Date

This plan, as amended, will be effective May 1, 2024, and will remain in effect as long as Consolidated Plan activities are ongoing or until superseded by a new Participation Plan for HOME, CDBG, and ESG Programs. The public will be given notice and an opportunity to comment on any major revisions to the 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.