

CITIZEN PARTICIPATION PLAN June 2, 2020

1. Introduction

The Citizen Participation Plan provides for and encourages citizens, organizations, businesses and other stakeholders to participate in the development of the Consolidated Plan, the Annual Action Plan, and any substantial amendments to the Plans. This plan describes how the City of Raleigh encourages and promotes participation through the establishment of policies and procedures for participation in the implementation of the Community Development Block Grant (CDBG), HOME Investment Partnership, and Emergency Solutions Grant (ESG) programs.

The City of Raleigh is required to adopt a Citizen Participation Plan that meets HUD's minimum requirement as set forth in the regulations for "Consolidated Submission for Community Planning and Development Programs" (24 CFR 91 Subpart B). In carrying out these requirements the City of Raleigh understands that participation on the part of its citizens, organizations, businesses and other stakeholders is vital to the effectiveness of all Consolidated Plan activities. All persons, but especially very low, low and moderate-income persons, particularly those living in slum and blighted areas and in areas where funds are proposed to be used, can actively participate in the planning, implementation, and assessment of such activities.

The Citizen Participation Plan outlines procedures by which each of the requirements set forth in 91:105 of the Federal Regulations are carried out. This Plan is effective as of May 16, 2020 and remains in effect until such time as all activities assisted are completed, or until superseded by a new Plan. This Plan also supersedes any Plan that may have been in effect prior to May 16, 2020.

2. Goals of the Citizen Participation Plan

A. To provide for involvement of citizens, organizations, businesses and other stakeholders in the identification of community development needs and housing; review of proposed activities and assessment of program performance in accordance with the schedule that is adopted each year.

B. To enable the City to respond to the needs of its citizens through community development and housing programs, policies and plans.

C. To encourage citizens, particularly very low, low and moderate income persons, residents of blighted neighborhoods, members of minority groups, non-profit agencies, public housing residents, the business and civic community, and special populations to submit their comments, questions and proposals regarding the City's Community Development Program.

3. Development of the Consolidated Plan

The Citizen Participation Plan requires that before adoption of the Consolidated Plan the City will provide the following information:

- A. The amount of assistance the City expects to receive from any grant funds and program income
- B. The range of activities that may be undertaken including the estimated amount that will benefit very low, low and moderate income persons
- C. The City's plans to minimize displacement
- D. The City's specific action steps to end chronic homelessness
- E. The City's long-term and short-term objectives for neighborhood revitalization strategies
- F. The City's public hearing calendar and process for developing and submitting the Consolidated Plan
- G. Provisions for receiving public comments on the proposed Plan

4. The Participation Process

The participation process is conducted both at a community wide level and in neighborhoods where revitalization activity is proposed or under way. The community wide process involves consultations with businesses, developers, community and faith based organizations, and other interested citizens concerning housing and redevelopment issues.

A. Agency Consultation Process: Agency consultations are a part of the ongoing process that includes service providers, advocacy groups and coordinating bodies responsible for providing services, especially to populations with special housing needs. City staff meet throughout the year with a number of local housing, social service, homeless, and economic development agencies to determine the housing needs of specific populations and groups.

B. Public Housing Authority Consultation: The City consults with the Raleigh Housing Authority (RHA) to facilitate city understanding of public housing needs and planned RHA activities, which will provide the basis for local certification of RHA's annual plans. Such consultation also helps ensure coordination between ConPlan activities and RHA activities in addressing issues of joint concern.

C. Neighborhood Outreach: The City meets with citizens' groups and conducts public meetings primarily in downtown neighborhoods. The City may also meet with neighborhood associations and other citizen groups as requested.

5. Consolidated Plan/Annual Action Plan Public Hearings

Each year the City conducts two (2) public hearings for the development of an Annual Action Plan for the City's housing and community development programs at a City Council meeting. The State of North Carolina's Open Meeting Law is followed.

A. Public Hearing #1: The first hearing occurs at the beginning of the planning process to review past program performance, to obtain views on community development and housing needs and to identify general strategic priorities for projected funding. The purpose of this hearing is to let very low, low and moderate income persons and residents of blighted neighborhoods offer their perceptions of problems within their neighborhoods and in the community at large and present proposals aimed at solving the problems. This public hearing is held in the City Council Chambers, **except as described in E. below.**

B. Public Hearing #2: The public hearing is held after staff has drafted the proposed annual budget and Consolidated Plan (or annual Action Plan) but prior to City Council approval of the Plan. This public hearing is held in the City Council Chambers, **except as described in E. below.**

C. Public Notice: Notices of all hearings will be advertised **not less than 12 days and not more than 30 days** prior to the hearing. Public notices indicate the date, time and location of the hearing, and the topics to be covered. Mailings (electronic where appropriate) are sent to interested persons and entities and the public hearing notices are posted on the City of Raleigh's web site at www.raleighnc.gov

D. Accessibility: All public meetings are held at locations providing accessibility for persons with physical disabilities and take place in locations convenient to residents.

E. When circumstances prevent an in-person event for public meetings or one or both public hearings held in support of a Consolidated Plan or Annual Action Plan, or amendment(s) to one or both, a "virtual" public meeting or public hearing will substitute for in-person gatherings, as allowed by the U.S. Department of Housing and Urban Development (HUD).

6. Public Comment Period

The Consolidated Plan and each Annual Action Plan are made available in draft form to receive public comments for at least thirty (30) days, **except in emergency situations such as that created by COVID-19, in which case the public comment period can be shortened to 5 days, as suggested by HUD.** Before the Plan is sent to HUD it will be approved by City Council. Copies of the draft Plan are available at the Housing and Neighborhoods Department office. The draft plan is also posted on the City's website at www.raleighnc.gov and accessible through the City's automated e-mail delivery system.

The proposed plan includes public comments made either orally at a public hearing or in writing. A summary of these comments or views and a summary of any comments or views not accepted and the rationale for not accepting the comments is attached to the final Consolidated Plan. Written responses are provided to all comments including complaints and grievances and/or proposals submitted during the Citizen Participation Planning process. The City makes every reasonable effort to provide a written response to all written comments within fifteen days of receipt of the comment. A concise summary of citizen participation and consultation process, including efforts to broaden public participation, is included in the Plan.

7. Section 108 Loan Guarantee Program

A. Background: The program is authorized under Section 108 of the Housing and Community Development Act of 1974 as the loan guarantee component of the Community Development Block Grant (CDBG) Program. The Section 108 program provides low-cost, long-term financing to the City of Raleigh to be used for economic development, housing, public facilities, infrastructure, and other community development activities.

B. Purpose: The City intends to create a loan pool to re-lend Section 108 funds to affordable housing developers, nonprofits, and businesses. Goals for using the Section

108 Loan Pool include acquiring land for redevelopment, revitalizing housing stock, development of new public facilities, directly assisting businesses and nonprofits, and real estate development projects that produce a public benefit.

C. Public Notice: Prior to making a loan, the City will provide public notice by posting a Notice of Funding Availability (NOFA) on the City website to solicit project proposals. The NOFA will be posted on the City website for a period of 30 calendar days. The NOFA will include a summary of the funding opportunity, funding eligibility criteria, proposal evaluation criteria, the proposal submission process, and the proposal submission deadline. Individual project proposals will be evaluated by a loan investment committee led by the City's Housing and Neighborhoods Department and comprised of City and community representatives.

D. Loan Awards: The City will post information about loans awarded through the Section 108 Loan Pool on the City website.

8. Adequate and Timely Information

All aspects of citizen participation in the City of Raleigh government are conducted in an open manner, with freedom of access for all interested persons or groups. Information pertinent to the activities of the Housing and Neighborhoods Department is circulated to the public and made available for review in the Community Development Division (CDD) during normal business hours of the City. This information is made public subject to all applicable laws regarding confidentiality and personal privacy in the CDD office. Access to all documents is open except where prohibited by law. There may be reproduction costs charged to persons requesting personal copies of CDD documents. Every attempt is made to respond to written requests for information within 15 days of receipt.

9. Non-English Speaking Persons

Where a significant number of very low, low and moderate income residents of blighted neighborhoods speak and read a primary language other than English, public hearing notices and basic information summaries are produced and made available in the appropriate language(s). The Community Services Division of the Housing and Neighborhoods Department has resources to help with this requirement but a qualified interpreter inventory is maintained by the City of Raleigh's Communications Department, which also has a responsibility to promote public awareness of this service. It is the responsibility of the Housing and Neighborhoods Department to request this service when needed.

Informational material is sent as appropriate to non-profit and social services organizations that serve non-English speaking residents.

10. Persons with Disabilities

The City of Raleigh has taken steps to ensure that individuals with disabilities are able to participate in the public hearings held in City Council Chambers.

Audio enhancements have been installed in the City Council Chamber. Assistive listening devices are available upon request. Interpreters for deaf and hearing impaired persons are available. Citizens in need of such assistance should provide a 24-hour notice by calling 919-996-3100 (voice) or 996-3107 (TDD).

11. Annual Performance Assessment and Reports

The Consolidated Annual Performance and Evaluation Report (CAPER) is a summary of Community Development Block Grant, HOME, ESG, and other housing program accomplishments for the past fiscal year. The CAPER is sent to HUD ninety days after the completion of the program year. Prior to its submission, the Housing and Neighborhoods Department will inform the public of the CAPER's availability for comment through a local newspaper, the City's web page (www.raleighnc.gov), and electronic notices.

Citizens have 15 days to examine the report and provide comments prior to its submission to HUD. A summary of all comments or views are attached to the CAPER submitted to HUD.

12. Program Amendments

From time to time, the Consolidated Plan or Annual Action Plan may be substantially amended to reflect changes in program activities and priorities. The following are considered substantial changes:

- A. Addition of a new activity or new priority not previously described,
- B. Cancellation of an activity category or deletion of a priority,
- C. A change in the purpose, scope, location, or beneficiaries of an activity, and
- D. A substantial change in the allocation or distribution of funds is defined as when the dollar amount of that change is equal to or greater than 25% of the City's current fiscal year federal budget by source (e.g., CDBG is undergoing a substantial change when 25% or more of that year's CDBG allocation plus program income is affected).

Prior to amending the Consolidated Plan or Action Plan, citizens will be given reasonable notice of, and opportunity to comment on, such proposed changes and the re-use of funds. The process to substantially amend the plan includes a public hearing using the public notice process described in section 5c above and a thirty (30) -day comment period to receive citizen comments on the proposed amendment prior to implementation. Citizens' comments, orally or in writing, will be considered. A summary of the comments and the rationale for not accepting any comments will be attached to the substantial amendment of the Consolidated Plan.

12. Technical Assistance

Technical assistance is provided to citizen organizations and very low, low and moderate-income persons who live in CD areas through a number of city departments. Staff support is provided through Community Specialists in the Community Engagement Division of the Housing and Neighborhoods Department who provide technical assistance to citizen groups. Assistance consists in part in helping to organize meetings,

explaining City policies and referring questions and concerns to appropriate City departments and other agencies. Within the Housing and Neighborhoods Department, there are staff persons who are available to answer questions related to the CDBG, HOME, and ESG programs, as well as to offer technical assistance to groups representative of LMI citizens in developing proposals for assistance under these programs.

13. Complaint Procedure

Written or oral complaints or grievances concerning the Consolidated Planning process or the CDBG, HOME, and ESG programs should first be directed to the City's Housing and Neighborhoods Department. It is the policy of the City to provide a procedure for the acknowledgment, presentation, consideration, investigation and disposition of complaints received concerning Community Development programs.

The Housing and Neighborhoods Department makes every effort to respond to all complaints within fifteen (15) days of receipt by sending a written response. Should the complainant not be satisfied, the complainant may arrange a meeting with the Housing and Neighborhoods Director or the Assistant City Manager for Community to discuss the complaint. If the complaint can still not be satisfied, a written complaint may be submitted in writing to the City's Compliance Officer located in the City Manager Office. Any citizen may make an oral or written petition to the City Council to discuss problems not resolved at the staff level.

14. Relocation Plan and Anti-Displacement Policy

Displacement will be minimized but when it is unavoidable, any person(s) displaced due to the activities of the Consolidated Plan Programs receive(s) relocation assistance and relocation payments in accordance with the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (Uniform Act) or 106(d) of the Housing and Community Development Act of 1974. The Relocation Staff provides information and assistance one-on-one to prospective displaced persons.