

**City of Walla Walla  
Community Development Block Grant (CDBG) Consolidated Plan  
Citizen Participation Plan**

Revised on April 23, 2020 to:

- Include virtual hearings as an allowed method for citizen participation;
- Include the types of declared disasters or emergency events, such as the recent coronavirus 19 (COVID19) pandemic, that may necessitate expedited substantial amendments;
- Provide details on possible actions, including reprogramming of funding and inclusion of new types of activities, that may be undertaken in response to the COVID19 pandemic;
- Includes provisions relative to Consolidated Plan citizen participation and Community Development Block Grant waivers made available under the Coronavirus Aid, Relief, and Economic Security (CARES) Act;
- Make minor edits that do not change current citizen participation policies.

Please be advised that if virtual hearings are used, real-time responses and accommodations for persons with disabilities and/or with limited English proficiency will be made available to the greatest extent possible.

All amendments to the plan are in **bold**. Please visit this webpage for future revisions to this plan.

## CDBG FUNDING

Beginning in 2014, the City of Walla Walla will receive an annual allocation of Community Development Block Grant (CDBG) funds through the US Department of Housing and Urban Development (HUD). In accordance with federal guidelines, CDBG funds are provided to projects that meet a national objective and carry out a CDBG eligible activity. There are three (3) national objectives: 1) benefiting low and moderate persons; 2) preventing or eliminating slums and blight; and 3) meeting urgent needs.

The city's CDBG allocation must focus on projects benefitting low- and moderate-income persons. Toward that end, the City of Walla Walla is required by HUD to develop a Consolidated Plan (Con Plan) and an Assessment of Fair Housing (AFH). The Con Plan includes a needs assessment and market analysis outlining levels of need in the areas of affordable housing, homelessness, special needs, and community development. This information forms the basis of a strategic plan to address priority needs given available funding and local capacity to carry out the activities. The AFH replaces the Analysis of Impediments of Fair Housing (AI) to assist the city in identifying fair housing issues and related contributing factors to address housing discrimination by affirmatively further fair housing. A Citizen Participation Plan (CPP) guides development of the Con Plan and the AFH.

## PURPOSE OF CITIZEN PARTICIPATION PLAN

The city recognizes the importance of public participation in both defining and understanding current housing, community development, and fair housing needs, and prioritizing resources to address those needs. The city's Citizen Participation Plan (CPP) is designed to provide for and encourage broad citizen involvement in development of the Con Plan, any substantial amendment to the Con Plan, the development of the AFH, any revisions to the AFH, and the performance report. This CPP was written in accordance with Section 91.105 of HUD's Consolidated Plan regulations.

The CPP encourages the representative participation of all citizens within the City of Walla Walla including racially and ethnically diverse populations, non-English speaking persons, youth, and those with disabilities. The CPP is designed specially to encourage participation by low- and moderate-income persons, particularly residents of predominantly low- and moderate-income neighborhoods as determined by the City of Walla Walla.

## ESTABLISHMENT OF A CITIZEN ADVISORY GROUP

A Citizen Advisory Group (CAG) comprised of elected officials, community leaders and at least one low- to moderate-income resident will be formed to review the needs assessment and market analysis and consider the input of city staff, residents, and

agencies in the areas of decent housing, a suitable living environment, and economic opportunities for low- and moderate-income residents. A minimum of five (5) persons to a maximum of nine (9) persons will be selected to serve on the CAG; members will be appointed by Council. Membership may include representatives from such entities as Walla Walla City Council, Walla Walla School District, Port of Walla Walla, Walla Walla County Human Services Department, the housing industry, and citizens at-large. Potential sub-recipients of funds will be ineligible to serve on the CAG.

The CAG will provide guidance and recommendations to City Council for identifying strategies and allocating funds. The CAG may also serve in the review of the performance report, substantial amendments to the Consolidated Plan, development of the Annual Action Plan, and development of the AFH.

#### LEAD AGENCY

The city's Support Services Department will develop and monitor the participation process. They will also serve as Lead Agency for development of the Consolidated Plan and the AFH for the City of Walla Walla.

Contact information:

City of Walla Walla

Support Services Department

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#### WALLA WALLA URBAN AREA COMPREHENSIVE PLAN

The Walla Walla Urban Area Comprehensive Plan 2007 Review and Update is the culmination of extensive community involvement in the development of a 20-year vision for Walla Walla and its urban area. An extensive series of events were held by the Comprehensive Planning Steering Committee and city staff to elicit citizen participation and input on issues. Over 500 people were involved in events including neighborhood walks and four facilitated neighborhood public meetings. Public input was also gathered using vision sessions, focus groups, a community survey, and public hearings.

Elements of the Comprehensive Plan include Community Character, Environment and Natural Resources, Land Use, Population and Housing, Economic Vitality, Commercial Retail Community, Utilities, Transportation, Capital and Community Facilities, and Parks and Recreation. The planning process addressed these categories in terms of

strengths, weaknesses, opportunities, and threats. That process included a review of existing conditions for each of these same elements and resulted in established goals, objectives, policies, and a strategic plan for implementation.

The Comprehensive Plan and its broad public input will be a major tool in development of the CDBG Consolidated Plan and its strategic plan for addressing the needs of low- and moderate-income residents and neighborhoods. The Consolidated Plan will focus on issues such as affordable housing, homelessness, economic development, special needs, community development, and neighborhood public safety needs.

#### ACTIVITIES TO ENHANCE CITIZEN PARTICIPATION:

Activities to enhance citizen participation in development of the Consolidated Plan and AFH include:

- City staff will announce the beginning of the Consolidated Plan and AFH planning processes and may publish periodic updates via the city's website and utility bill inserts.
- City staff will meet with community-based and regionally based organizations that represent protected class members and organizations that enforce fair housing laws.
- Encourage participation of Continuums of Care, businesses, developers, nonprofit organizations, philanthropic organizations, and community-based and faith-based organizations in the process of developing and implementing the AFH and Con Plan.
- In conjunction with community-based organizations such as Commitment to Community, city staff may provide outreach and/or hold meetings specifically in neighborhoods defined as low- and moderate-income.
- The city may conduct a citizen survey of community development needs and city service satisfaction.
- The city will conduct a minimum of two public hearings per year to obtain citizens' views and to respond to proposals and questions; at least one will be held before the proposed Consolidated Plan is published for comment and another before the proposed AFH is published for comment.
- Consult with regional government agencies in addition to adjacent units of general local government and local government agencies, including those with metropolitan-wide planning and transportation responsibilities.
- Consult with the Housing Authority (HA) on strategies and proposed actions to affirmatively further fair housing and on proposed actions to affirmatively further fair housing in the Con Plan.
- Obtain HA input on addressing fair housing issues in public housing and Housing Choice Voucher programs.

## MEASURES TO ENHANCE CITIZEN PARTICIPATION

Measures to enhance citizen participation in the development of the Consolidated Plan and AFH include:

- When citizen participation is expected to exceed 10% non-English speaking persons, neighborhood outreach efforts, meetings and public hearings will include interpreters to meet the needs of the non-English speaking residents, primarily our Latino population, the largest minority group in the city at approximately 24%.
- Public hearings will generally be located in City Hall, 15 N. 3<sup>rd</sup> Ave. during City Council meetings. Council chambers are accessible to persons with disabilities. Public meetings concerning development of the Consolidated Plan, the CPP, and the AFH will be held in buildings accessible to disabled persons. **In the event that City Hall is closed to the public, virtual public meetings and hearings may be used instead. Check [www.wallawallawa.gov](http://www.wallawallawa.gov) for notices of all public meetings, including virtual hearings.**
- **If virtual public hearings are used, real-time responses and accommodation for persons with disabilities and/or with limited English proficiency will be made available to the greatest extent possible. Also, the virtual hearing method will only be used in lieu of in-person hearing if national or local health authorities recommend social distancing and limit public gatherings for public health reasons.**
- Upon reasonable notice, the city will make efforts to provide notices and summaries of information in other languages and will make efforts to provide accommodations for persons with disabilities. To arrange for such assistance, requests must be made to the Support Services Department, (509) 527-4540, at least five working days prior to the scheduled public hearing or meeting.
- A list of agencies, organizations and persons interested in updates throughout the planning and evaluation processes will be maintained by Support Services.

## NOTICE OF PUBLIC HEARING DATES

Notice of public hearings dates will be accomplished by the following:

- Notices of public hearing dates will be published in the Union Bulletin at least (14) days prior to the hearings.
- An electronic copy of the notice will be sent to the mailing list of interested agencies and persons maintained by the Support Services Department.
- A copy of the notice will be posted on the City of Walla Walla's webpage.
- A copy of the notice will be posted at City Hall.

The notice will include the date, time, location, subject matter and how and to whom to submit comments.

**Public hearing refers to both public hearings, including virtual hearings, and community meetings for purposes of this Citizen Participation Plan as well as for meeting the requirements for public hearings under the CDBG regulations [Title 24 of the Code of Federal Regulations, Part 91.105(e)(1)].**

#### COMMENTS ON THE CITIZEN PARTICIPATION PLAN

The public will be advised of the availability of the draft Citizen Participation Plan and is invited to comment on it. A notice will be placed in the Union Bulletin providing thirty (30) days to comment. Comments may be sent in writing to the CDBG Coordinator, Support Services Department, 15 N 3<sup>rd</sup> Ave., Walla Walla, WA 99362.

#### COMMENTS ON THE CDBG CONSOLIDATED PLAN

The public will be advised of the availability of the draft CDBG Consolidated Plan. A notice will be placed in the Union Bulletin providing fifteen (15) days to comment. Comments may be sent in writing to the CDBG Coordinator, Support Services Department, 15 N 3<sup>rd</sup> Ave., Walla Walla, WA 99362.

#### COMMENTS ON THE ANNUAL ACTION PLAN

The public will be advised of the availability of the draft Annual Action Plan and is invited to comment on it. A notice will be placed in the Union Bulletin providing fifteen (15) days to comment. Comments may be sent in writing to the CDBG Coordinator, Support Services Department, 15 N 3<sup>rd</sup> Ave., Walla Walla, WA 99362.

#### COMMENTS ON THE ANNUAL PERFORMANCE REPORT

The public will be advised of the availability of the draft Annual Performance Report and is invited to comment on it. A notice will be placed in the Union Bulletin providing fifteen (15) days to comment. Comments may be sent in writing to the CDBG Coordinator, Support Services Department, 15 N 3<sup>rd</sup> Ave., Walla Walla, WA 99362.

#### COMMENTS ON THE ASSESSMENT OF FAIR HOUSING

The city will make available to the public, residents, public agencies, and other interested parties any HUD-provided data and other supplemental information included in the AFH. Consultation and community participation is required in the analysis of fair housing data, the assessment of fair housing issues and contributing factors, and in the identification of fair housing priorities and goals.

The public will be advised of the availability of the draft Assessment of Fair Housing and is invited to comment on it. A notice will be placed in the Union-Bulletin providing (45) days to comment. Comments may be sent in writing to the CDBG Coordinator, Support Services Department, 15 N 3<sup>rd</sup> Ave., Walla Walla, WA 99362.

## AMENDMENTS AND REVISIONS

From time to time, amendments to the CPP, Consolidated Plan, AAP, and AFH will be necessary as conditions change. Amendments of a minor nature will be made as needed throughout the year. However, the public will be given a 30-day opportunity to comment on all substantial amendments to the plans.

A “substantial” amendment to the Consolidated/Annual Plan is defined as:

- A budget increase or decrease that is more than 10% of the grant allocation.
- A change in purpose, scope, general location, or intended beneficiaries or the addition of a new project.

A revision to the AFH is required, at minimum, when:

- A material change occurs which can include but is not limited to:
  - Presidentially declared disasters;
  - Significant demographic changes;
  - New significant contributing factors;
  - Civil rights findings, determinations, settlements, or court orders.
- HUD provides written notification specifying a material change that requires revision.

**\*\*For CDBG funding under FY 2019-2020, FY 2020-2021, and the Coronavirus Aid, Relief, and Economic Security Act or CARES Act, the City may provide a 5-day notice/comment period of a proposed amendment beginning April 26, 2020 as allowed under a HUD waiver. This includes any new activities proposed. A public hearing is not required but documentation relative to substantial amendments applies.**

## DISASTER/EMERGENCY EVENTS THAT MAY REQUIRE EXPEDITED SUBSTANTIAL AMENDMENTS

It may be necessary to expedite substantial amendments to the Consolidated Plan in the event of a declared disaster or emergency. There are three types of disasters/emergency events that may necessitate an expedited substantial amendment including (1) Man-Made-disasters, (2) Natural disasters, and (3) Terrorism. Man-made disasters can include chemical spills, mass rioting, power outages, dam failure, plant explosions, etc. Natural disasters can include earthquakes, tsunamis, hurricanes, tornadoes, wildfires, flooding, and public health issues such as wide-spread disease such as the recent coronavirus disease (COVID-19). Terrorism events include bomb threats, biochemical attacks like the spread of anthrax, or cyber-attacks like hacking, phishing, and virus distribution, etc.

These expedited substantial amendments may include funding new activities and/or the reprogramming of funds including canceling activities to meet needs resulting from a declared disaster or emergency. Therefore, the City of Walla Walla may utilize CDBG funds to meet these needs with a 5-day public comment period instead of a 30-day public comment period, which is otherwise required for

**substantial amendments.**

**For CDBG funding under FY 2019, FY2020, and the Coronavirus Aid, Relief, and Economic Security Act or CARES Act, the City may provide a 5-day notice of a proposed substantial amendment beginning April 26, 2020 as allowed under a HUD waiver.**

**With respect to a declared disaster, the City may elect to use CDBG funds to address needs not provided for by the Federal Emergency Management Agency (FEMA) and the Small Business Administration (SBA), or other disaster relief efforts. Funding for disaster relief may not duplicate other efforts undertaken by federal or local sources unless allowed by the federal government. Potential eligible uses of funds are those that are included in this Citizen Participation Plan, the Consolidated Plan, or any other CDBG eligible uses. HUD may provide new guidance on eligible uses in which the City will comply with and may utilize as well.**

**All eligible CDBG activities, including those to address declared disasters or emergencies, must meet one of three national objectives which are: (1) Benefit to low- and moderate-income (LMI) persons; (2) Aid in the prevention of slums or blight; and (3) Meet a need having a particular urgency (referred to urgent need). The City may carryout eligible CDBG activities to meet needs resulting from declared disasters or emergencies under any one of the three national objectives.**

#### ACCESS TO INFORMATION AND AVAILABILITY OF PLAN DOCUMENTS

During development of the CDBG Consolidated Plan, city staff will meet with community groups, agencies, organizations and citizens to provide information on the uses of the CDBG funds and to hear and discuss needs. In addition, city staff will discuss the components of the Plan including the needs assessment, the strategic plan, the Annual Action Plan, and any substantial amendments to those plans.

The city will provide reasonable and timely access by citizens, public agencies, and other interested parties to records and information on the CDBG Consolidated Plan (and previous Consolidated Plan documents) and the city's use of the funds under the programs covered by the Plan during the preceding five years. In addition, the city will provide information to the public during the planning processes on proposed activities, the amount of assistance available, the range of activities that may be undertaken, and estimates of the amount of funds that will benefit low- and moderate-income persons.

The Citizen Participation Plan, CDBG Consolidated Plan as adopted, the Performance Report, the Assessment of Fair Housing, and all associated policy documents will be available to the public including in a form accessible to persons with disabilities upon request. The most recent documents will be available on the City of Walla Walla web page, <http://wallawalla.gov>, and at the City Library, 238 E Alder, Walla Walla, WA

99362. These documents will also be available by contacting the Support Services Department at (509) 527-4540.

### TECHNICAL ASSISTANCE

The city may provide technical assistance to groups representing low- and moderate-income persons to assist them in understanding the requirements for developing proposals for funding assistance under the Consolidated Plan. Technical assistance may include referral to information sources, providing information on programs and activities, workshops, and one-one assistance.

### COMPLAINTS AND GRIEVANCES

Complaints concerning the CDBG Program, the Consolidated Plan, Annual Action Plan, Assessment of Fair Housing, or the Performance Report may be made to the CDBG Coordinator of the Walla Walla Support Services Department. All complaints made in writing will be responded to in writing within 15 days of receipt. Persons not satisfied with the response may write an appeal of the decision and request a review of the complaint by the Deputy City Manager of the City of Walla Walla. A written response conveying the results of the review to the complainant will be made in writing within 21 days of receipt of the appeal. All decisions of the Deputy City Manager will be final.

### ANTI-DISPLACEMENT AND RELOCATION ASSISTANCE PLAN

The city's Anti-Displacement and Relocation Assistance Plan is intended to minimize the displacement of persons as a result of program activities and to assist any persons actually displaced. The policy is to minimize the adverse impacts of the displacement and discourage displacement unless it is clearly necessary to achieve the Plan's objectives. In the event that displacement is unavoidable, those displaced will receive the full benefits and assistance provided for under the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended, and HUD regulations. The full Anti-Displacement and Relocation Assistance Plan is available upon request by contacting the Support Services Department and is included in the Consolidated Plan.