

Section 5 – PLAN FOR PUBLIC INPUT

5.1 Public Input for development of 2009-2012 Consolidated Plan

5.1.1 Community consultation (see Section 6 – Reference Tools for links to most of the community plans consulted).

Descriptions of the public input efforts conducted by organizations whose published studies and plans are cited in the Consolidated Plan are summarized below. This is not an exhaustive list, since not all plans included such information in their respective publications.

1. AIDS Housing Continuum Planning Meeting

HSD and Public Health – Seattle & King County HIV/AIDS Program staff worked together to coordinate a planning retreat to create a vision for the AIDS Housing continuum in Seattle and King County in the year 2012. Over 15 agencies were represented and spent the day discussing emerging needs and identifying service and housing strategies for homeless and low-income persons living with HIV/AIDS in our community. The priorities that emerged from the session include: reviewing the focus of the housing continuum; creating low-barrier, service-enriched housing units; and enhancing the centralized housing entry system that exists within the AIDS housing system. These priorities will be incorporated into the work of the AIDS Housing Committee over the next year.

2. Seattle Housing Authority Moving to New Ways (MTW) 2008 Annual Plan development.

As part of developing the MTW Plan and annual budget, SHA provides opportunities for public review and comment.

- The primary opportunity is a public hearing. Residents are notified of the hearing through The Voice (a monthly newspaper for SHA residents), a notice on rent statements, posters in SHA buildings, and a letter to about 120 resident leaders.
- The public is informed via SHA's free monthly e-mail newsletter, Building Community, which reaches about 1,300 subscribers, and through posting on www.seattlehousing.org and an ad in the Seattle/King County newspaper of record, the Daily Journal of Commerce.
- SHA held a public hearing on September 17, 2007. About 40 people attended, including residents of SHA housing programs. The draft plan and annual budget were presented and testimony taken, followed by a general question and answer period.

- SHA’s Joint Policy Advisory Committee, which is made up of resident representatives who advise SHA on issues of concern to residents, discussed major plan activities on September 11 and 13, 2007. In total, about 50 resident leaders attended.

3. **Seattle/King County Area Agency on Aging 2008 strategic plan development:**

The Older American’s Act (OAA) requires the Area Agency on Aging to establish a volunteer Advisory Council to assist in identifying unmet needs, advise on needed services, and advocate for policies and programs that promote quality of life. As required by the OAA, our plan incorporates suggestions from the Advisory Council as well as numerous partners in the community. We engaged community members in several activities to better understand local needs by conducting:

- Five Focus on the Future community forums,
- An on-line survey through *Seniors Digest*,
- Three focus group discussions with older adults and health and social service providers, and
- A review of the Draft Plan by the Advisory Council, Sponsors, and key partners, and
- Three public hearings

4. **Homeless Youth and Young Adult subcommittee of TYP:**

Marci Curtain, HSD liaison to the Ten Year Plan Homeless Youth and Young adult subcommittee submitted the recently published “*A Plan to End Young Adult Homelessness in King County*” in response to a call for comment on the draft Homeless Needs Assessment section in August 2008. Excerpts from that plan are included in the Special Needs and Vulnerable Populations analysis in Section 3 – Needs Assessment of the 2009 Consolidated Plan.

5. **Human Services Department - Homeless coordinating committee**

On August 12, 2008, Andrea Akita announced the availability of the 2009 Consolidated Plan for comment. The group of 15+ internal City and external Ten Year Plan committee liaisons were encouraged to submit comment, especially on the draft Homeless Needs section of the Consolidated Plan.

5.1.2 **Consolidated Plan public comment summary**

During the 2007-2008 period of development for the Consolidated Plan, staff took advantage of multiple formal and informal venues for engaging the general public and consumers in dialogue about the issues they identified as emergent and/or important to consider in evaluating program options and funding decisions. Not all venues were specific to the four federal fund sources, but all are relevant to the needs captured in Section 2 and Section 3 of this Consolidated Plan. Input venues included:

- Specific drafts of sections of the Consolidated Plan vetted through standing cross-organization work groups for comment (e.g. Human Services Homeless coordinating committee, Housing Levy work group, CEH- Ten Year Plan Homeless Youth and Young Adult subcommittee, etc.)
- Staffing of on-going or issue specific community groups and feedback from those participants
- Advertisement of the opportunity for public comment on the draft Consolidated Plan through print and online media including:
 - ❖ Legal notice through the Daily Journal of Commerce on August 19, 2008
 - ❖ August 19, 2008 notice of public comment and explanation of 2009 Consolidated Plan development process on HSD's CDBG administration website posted at http://www.seattle.gov/humanservices/community_development/conplan/default.htm
 - ❖ August, 2008 listing of link to draft 2009 Consolidated Plan on Office of Housing website under "In the News" at <http://seattle.gov/housing>
 - ❖ Article published in the September, 2008 Area Agency on Aging sponsored e-newsletter *Senior Digest*
 - ❖ Publication to public and community services stakeholders via the September 2008 Human Services Department newsletter
 - ❖ Public hearings held jointly with City Council review of the draft document on three occasions: August 6th, September 3rd and September 17, 2008. Comments received summarized below.

1. **Ballard Home for All**

The voluntary group of neighborhood and homeless service advocates is organized around the issue of increasing numbers of individuals and families who are living out of parked cars or campers in various locations in Ballard. Human Services Department staff are working with this group to educate them about existing options for homeless services and learn about community concerns and thoughts regarding car camping for homeless people.

- **Refugee and Immigrant symposium:** A limited scope research study conducted by a University of Washington Geography student investigated current housing challenges faced by refugees in Washington communities. Challenges included finding and keeping

housing and exploring housing resources that are available. The report noted that housing challenges vary from one refugee community to another, as different communities have different housing preferences and needs. The methodology used for the study included handwritten surveys, translated focus group discussions, and personal interviews with refugee housing recipients and providers. Focus group topics included personal housing experiences, including frustrations when looking for housing; use of low-cost or free services such as shelters; suggestions to improve housing services; and experiences refugees encountered working with non-profit service organizations, private landlords and the public housing authorities. The author gathered a number of comments and concerns during the course of the study.

Concerns from Somali families included:

- Difficulty getting on the waiting list for subsidized housing.
- Difficulty accessing public and private housing
- Insufficient information about federal protections against discriminatory housing practices (Fair Housing Act).
- Lacking the skills and education for the American job market.
- Lacking long-term rental histories, a requirement of many landlords.
- Difficulties of single –parent households to receive affordable childcare.

Refugees from the former Soviet Union reported similar concerns:

- Language barriers, wait list, and inadequate access to housing information.
- Perceived or actual discrimination from landlords.
- Limited income prevents rental of units large enough to accommodate the number of adults living in one space.
- Desire to live close to family and friends or within certain school districts force living in areas where affordable housing is scarce or non-existent.

Public Housing Authority staff comments:

- Language barriers between housing seekers and housing providers lead to miscommunication and non-compliance with housing regulations.
- Using family members for interpretation can result in incorrect interpretations where the potential housing client receives information that their family member thinks they want to hear, rather than actual housing rules.
- Lack of cultural understanding can lead to Housing Authority staff inadvertently offending potential housing clients, which then makes the client less cooperative with the housing application process and less compliant once housing is secured.
- Some refugee clients don't follow housing rules because they either don't understand or are choosing not to follow the rules originally agreed upon.

Rental Assistance/Section 8 Housing Program summary comments:

- Refugees like vouchers because they allow housing support without the negative, stigmatizing public housing associations.
- Vouchers expand housing opportunities and enable openings on waiting lists.
- Agency-based vouchers allow housing decision to be made jointly by case manager and client.
- Limited number of availability of vouchers does not address current housing demand.
- Difficult to help LEP clients get through all the necessary paperwork.
- It is impossible to get all potentially eligible people on the wait list.
- Research findings indicated that the design of a housing orientation information packet could have immediate benefit to nonprofits that lack the time or resources to conduct training sessions or hire a housing coordinator to develop and package this information.

Other comments from refugee and immigrant participants in the study:

- Section 8 certificates issued by the Seattle Housing Authority and the King County Housing Authority create a safety net to prevent homelessness and stabilize the lives of many refugee and immigrant households.
- Refugees noted that though they met all requirements for the Program, they often faced additional scrutiny from housing authority staff.
- Conflicting requirements from the Seattle Housing Authority and the King County Housing Authority make it difficult for refugees and immigrants to access the program.
- Though community nonprofit agencies which serve refugees and immigrants report that many refugees reside in public housing in Seattle, the local Housing Authority currently does not compile data on the number of refugees and immigrants on its waiting list.

The report concluded with recommendations including:

- Create a single, centralized housing information center, staffed full time with staff informed about public and private housing resources, options, basic rental rules, and related information.
- Provide housing information translated into “high demand” languages.
- Create an incentive program to encourage refugees to transition from public housing to the private market.
- Improve training for staff members who assist refugees with housing resources. This training should include information about the Landlord/Tenant Act as well as other housing laws and concerns.

2. Presentation of the DRAFT 2009 Consolidated Plan highlights to the Seattle King County Coalition for the Homeless (SKCCH) on 8/20/08:

General reaction was one of interest in the next four year funding cycle. No comments were received specific to the Goals and data presented. The Seattle/King County

Coalition on Homelessness (SKCCH) was formed in 1979 and is one of the oldest homeless coalitions in the country. The Coalition works collaboratively to ensure the safety and survival of people who are homeless and to end the crisis of homelessness in our region. SKCCH's current membership roster includes over 60 agencies serving homeless people County-wide.

Ongoing efforts of the coalition include:

- Organizes and implements advocacy campaigns for increased funding for homelessness and housing programs
- Takes a leadership role in the Committee to End Homelessness in King County
- Shapes public policy related to housing, poverty and homelessness
- Coordinates the Annual One Night Count of homeless individuals on the street and in shelter & transitional programs
- Organizes and implements "Project Cool", a yearly event that collects and distributes back-to-school supplies for homeless children
- Provides an important forum for information sharing in relation to service-provision, current legislative issues, and funding resources
- Allocates government funds through competitive processes

3. Comments from Advisory council on Aging and Disability Services:

- A letter calling for all publicly funded housing to be built utilizing Universal Design (UD) elements that assist those with limited mobility and physical handicaps including:
 - Step-free entrances, with smooth flooring transitions between rooms
 - Wide doors at least 36" wide
 - Wheelchair accessible path to all rooms on main floor
 - Lever door handles
 - Adjustable height shower heads
 - Variable height work surfaces in the kitchen and bathroom
 - Light switches placed at entryway to each room
 - Rocker style switches at convenient height (44-48") for old and younger disabled
 - Electrical wall outlets at least 18" above floor level
 - Grab-bars in bathrooms (shower, bathtub, and toilet areas)
 - At least one main floor toilet wheel-chair accessible
 - Non-slip surface on stair treads

While these considerations may add slightly to the cost per unit, they are necessary to allow publicly funded housing to serve Seattle's large and rapidly growing aged and disabled populations, and to allow aging-in-place.

4. Comments from Mr. Robert Jackson, given in person to CDBG Administrator on September 12, 2008:

- Mr. Jackson requested and received both a hard copy and electronic copy of the draft Consolidated Plan to review
- He asked that charts and graphs used in the Needs Assessment section of the draft Plan be available in color for improved readability
- He complained broadly that City documents are hard to find, that neither the Clerk's Office nor the neighborhood service bureaus know anything about the draft Consolidated Plan and therefore could not provide him with any information. He suggested that there be one reading room in City where all City documents could be made available. He also suggested having CD ROMs of the documents available at all public hearings or meetings about the plan. (Note: the City plans to make both hard copy and CD-ROM copies of the final plan available to the public through a variety of outlets.)
- He would like, clearly described in the first few pages the author and a phone number for the author, and thought a footer identifying the version of the draft plan would be a good idea
- He also indicated it would be a good time to evaluate the Seattle Housing Authority's "Moving to Work" plan

5. Comments from August 6, 2008 Housing and Economic Development Committee briefing

- Comments specific to the draft 2009 Consolidated Plan were not received
- However, 12 citizens commented on the City's proposed application for the Fort Lawton Redevelopment plan which focuses on providing opportunities for housing for low-income and formerly homeless individuals. Neighborhood support for the planned redevelopment is generally positive with concerns for the proposed density and mix of housing units as well as protection of green space and trees on the existing land. Traffic concerns regarding the entrance to the new development and its shared boundary with existing streets were also raised. The Office of Housing, as lead for the Fort Lawton proposal, worked closely with CDBG administration to use data from the adopted 2005 Consolidated Plan in the application as well as creating consistency with the proposed 2009 Consolidated Plan.

6. Comments from September 3, 2008 Housing and Economic Development Committee briefing

- Comments specific to the draft 2009 Consolidated Plan were not received
- However, three citizens commented on the City's proposed application for the Fort Lawton Redevelopment plan. Concerns were raised regarding parts of the application that were still at the "conceptual" phase with a request to access details of planning development as soon as practicable.
- Linda Pilot, a private citizen raised concerns about relocation of subsidized housing residents in Jefferson Terrace due to potential condo conversion. As a disabled person she cannot pay for moving from a public housing unit to a private apartment

and asked that the City remain involved to monitor the outcome of potential relocation.

7. Comments from September 17, 2008 Housing and Economic Development Committee briefing

- No comments received at the hearing or via communication with City Council staff.

5.2 Citizen Participation Plan

Introduction

The City of Seattle is required by the U.S. Department of Housing and Urban Development (HUD) to have a detailed Citizen Participation Plan that contains the City's policies and procedures for public involvement in the Consolidated Plan process and the use of Community Development Block Grant (CDBG), HOME Investment Partnerships (HOME), Emergency Shelter Grant (ESG), and Housing Opportunities for Persons with AIDS (HOPWA) money.

The community involvement process has three main objectives:

- To determine how well our housing, economic and human development funding is meeting the needs of the community
- To determine what other types of resources and services are needed in the future
- To help develop priorities

The City will provide community members with a reasonable opportunity to comment on the Citizen Participation Plan and on substantial amendments to the Participation Plan. The City will announce the availability of the Citizen Participation Plan in the Daily Journal of Commerce and online at the City's official website for the Human Services Department. Copies are also available at the CDBG Administration Office and will also be mailed to individuals by request by calling 206-684-0288.

I. CONSOLIDATED PLANS AND ANNUAL UPDATES

Encouraging Public Participation

The Citizen Participation Plan encourages public participation by:

- Facilitating involvement of residents of public and assisted housing and of low- and moderate-income people, especially those living in neighborhoods and areas where CDBG, HOPWA, ESG and HOME grants might be spent.
- Holding public hearings at relevant stages of the funding process. Hearings must give residents a chance to state community needs, review the proposed uses of funds, and comment on the past uses of these funds.
- Taking whatever actions are appropriate to encourage involvement from people of color, people who do not speak English, and people with disabilities.
- Mayor Greg Nickels launched an Immigrant and Refugee initiative as part of Seattle's commitment to improve access to services for an increasingly multi-cultural and diverse population. The initiative includes a translation and interpretation policy. The policy guides the City's efforts to provide access to key services and increase the transparency of City forms and publications through languages other than English. Interested residents

and community groups may request pertinent sections of CDBG related reports for translation into Spanish, Vietnamese, Cantonese, Mandarin, Somali, Tagalog and Korean. In addition, translations of the Frequently Asked Questions (FAQ) about the 2009-2012 Consolidated Plan are planned to be available on the CDBG website:
http://www.seattle.gov/humanservices/community_development/conplan/default.htm

The Role of Low-Income People

HUD declares that the primary purpose of the programs covered by this Citizen Participation Plan is to improve communities by providing: decent housing, a suitable living environment, and expanded economic opportunities -- all principally for low- and moderate-income people. The amount of federal CDBG, HOME, ESG, and HOPWA money Seattle gets each year is heavily based upon the severity of poverty, substandard housing conditions, and the prevalence of HIV/AIDS. Hence, it is necessary that the Consolidated Planning process genuinely involve low-income residents who experience these conditions. Meaningful participation from low-income people must take place at all stages of the process, including: identifying needs; setting priorities among these needs, deciding how much money should be allocated to each high-priority need, and suggesting the types of programs to meet high-priority needs; overseeing the way in which programs are carried out; and, commenting on program performance.

The Various Stages of the Consolidated Plan Process

The policies and procedures in this Citizen Participation Plan relate to several stages of action mentioned in law or regulation. In general, these stages or events include:

1. Identification of housing and community development needs.
2. Preparation of a draft plan for use of funds for the upcoming year called the Proposed Annual Action Plan or a new Consolidated Plan. The final Annual Action Plan and Consolidated Plan are adopted by the City Council.
3. Development of a Substantial Amendment, if it is necessary to change how the money already budgeted in an Annual Action Plan will be used, or to change the priorities established in the Consolidated Plan. If a Substantial Amendment is needed, it will be proposed, considered, and acted upon.
4. Preparation of an Annual Performance Report after a complete program year, . The Annual Performance Report is released for public review and comment and then sent to HUD.

The Program Year

The "program year" chosen by Seattle is **January through December**.

Community members may comment on the **Citizen Participation Plan** for a period of **fifteen (15)** days from the date of the publication of notice announcing its availability by writing to the CDBG Administration Office of the Human Services Department, P.O. Box 34215, Seattle, Washington, 98124-4215, or by e-mail to blockgrants@seattle.gov.

Citizen Comment Overview

- **All comments are welcomed.** The City urges community members to identify needs and share their housing and community development ideas. All comments and suggestions regarding the Citizen Participation Plan, Consolidated Plan, Annual Performance Report, and Section 108 Loan Guarantee Projects are welcome.
- **There is a 30-day comment period for the Consolidated Plan and Substantial Amendments.** Community members may comment on the Consolidated Plan, and, when applicable, on a Substantial Amendment(s) to these documents for a period of thirty (30) days from the date of the publication of notice announcing its availability by writing to the CDBG Administration Office of the Human Services Department, P.O. Box 34215, Seattle, Washington, 98124-4215, or by e-mail to blockgrants@seattle.gov.
- **There is a 15-day comment period for the Consolidated Annual Performance and Evaluation Report.** Community members may comment on the Consolidated Annual Performance and Evaluation Report (CAPER) for a period of fifteen (15) days from the date of the publication of notice announcing its availability by writing to the CDBG Administration Office of the Human Services Department, P.O. Box 34215, Seattle, Washington, 98124-4215, or by e-mail to blockgrants@seattle.gov.
- **All documents will be made available on the Internet.** The Citizen Participation Plan, Consolidated Plan and Annual Performance Report will be made available online on the City of Seattle Department of Human Services website.
- **Arrangements will be made for those with special needs.** For announced public hearings before the City Council or a committee of the Council, persons with hearing impairments may call the City Council Office at 206-684-8888 or TDD 206 233-0025.
- **Non-English speaking community members and sight-impaired persons** may call the CDBG Administration Office at 206-684-0288 or e-mail to blockgrants@seattle.gov to make arrangements for translated materials and recordings.

Public Notice

Public notice shall be provided once certain documents are available, such as the Proposed Annual Update or Consolidated Plan, any proposed and final Substantial Amendment to the Annual Update or Consolidated Plan, and the Annual Performance Report. In addition, public notice shall be provided of all public hearings and all public meetings relating to the use of funds or planning process covered by this Citizen Participation Plan. Public notice shall be provided with enough lead-time for residents to take informed action. The amount of lead-time will depend upon the event.

- **Notice of a Public Hearing will be published 14 days before the event.** Notice of all public hearings will be published in the *Daily Journal of Commerce* and community newspapers fourteen (14) days prior to the date of the hearings.

- **Notices will be published in a variety of sources.** The City shall publish public notices in the *Daily Journal of Commerce* and in community newspapers as necessary and appropriate. To encourage involvement by people of color, people who do not speak English, and people with disabilities, public notice may also be provided through flyers or letters to neighborhood organizations, public housing resident groups, religious organizations, and non-profit agencies providing services to low-income people through mailing lists maintained by the City of Seattle Human Services Department, the Office of Economic Development, and the Office of Housing. The contents will include the date, time, location and purpose of the meeting or hearing, or a summary of the content of the newly available document. In addition, a public notice will be sent to any person or organization requesting to be on a mailing list. Public notices will also be published online at the official website of the City's Human Services Department.
- **Members of the public will have access to records and information.** The City will provide the public with reasonable and timely access to the data or content of the Consolidated Plan, as well as the proposed, actual, and past use of funds covered by this Citizen Participation Plan. The City's public disclosure policies and procedures will be followed.
- **Members of the public will have access to meetings.** The City will provide the public with reasonable and timely access to local meetings relating to the Consolidated Plan process.
- **Standard Documents will be made available to members of the public.** Standard documents include: the proposed and final Annual Update and Consolidated Plan adopted by the City Council; proposed and final Substantial Amendments to either an Annual Update or the Consolidated Plan; Annual Performance Reports; and the Citizen Participation Plan.

In the spirit of encouraging public participation, copies of standard documents will be provided to the public at no cost and within a minimum of five working days of a request. These materials will be available in a form accessible to persons with disabilities, when requested.

Public Hearings and Meetings

Public hearings are held in order to obtain the public's views. Hearings cover community needs, development of proposed activities and proposed uses of funds, and a review of program performance, i.e. to review what was accomplished with the use of funds spent during the past program year. To ensure that City Council members are able to hear the views of potential and actual beneficiaries of the funds, at least one annual public hearing will be sponsored by the City Council.

- **Public hearings will be accessible to members of the public.** Public hearings will be scheduled at times convenient to most people who benefit or who might benefit from the use of funds. Hearings will be held at locations accessible by bus. All public hearings will

be held at locations accessible to people with disabilities. Provisions will be made for people with disabilities when requests are made at least five working days prior to a hearing. In addition, translators will be provided for people who do not speak English when requests are made at least five working days prior to a hearing.

- **The public process will involve a number of opportunities to comment.** At least one public hearing will be held each year to obtain the views and opinions about housing and community development needs and the priority of those needs from potential and actual beneficiaries of the funds. In order to encourage public involvement, focus groups and small group meetings may be held prior to the first public hearing to help determine the specific needs and priorities identified by low- and moderate-income people. There will be a considerable effort to engage communities of color and marginalized communities. The meetings, if held, will be completed thirty (30) days before a draft Plan is published for comment so that the needs identified can be considered by the City and addressed in the draft Annual Update/Consolidated Plan.
- **Public hearings will be held at least 15 days after the draft Consolidated Plan is made available and members of the public will have at least 30 days to comment.** A public hearing will be conducted by City Council at least fifteen (15) days after the Proposed Annual Update/Consolidated Plan is available to the public. The public shall have a minimum of thirty (30) days from the time of the publication of proposed Annual Updates or Consolidated Plans to comment on the proposed documents before a Final Annual Update/Consolidated Plan is approved by the City Council.
- **All comments will be carefully considered.** In preparing a final Annual Update or Consolidated Plan, careful consideration will be given to all comments and views expressed by the public, whether given as oral testimony at the public hearing or submitted in writing during the review and comment period. The final Annual Update or Consolidated Plan will have a section that presents all comments, plus explanations of the City's response.

Technical Assistance

City staff will work with organizations and individuals representative of low- and moderate-income people who are interested in developing and submitting a proposal to obtain funding for an activity under any of the programs covered by the Consolidated Plan. The level and type of assistance will be determined by the City, but does not include the provision of funds to the group.

II. CONSOLIDATED ANNUAL PERFORMANCE AND EVALUATION REPORT

- **A performance report is required each year.** Every year, Seattle must send HUD Consolidated Annual Performance and Evaluation Report (CAPER) within 90 days after the close of the program year. In general, the CAPER must describe how funds were

actually used and the extent to which these funds were used for activities that benefited low- and moderate-income people.

- **The City will conduct a public comment process for the CAPER.** The City will provide public notice that a CAPER report is available so that residents will have an opportunity to review it and comment on it. The following procedures apply specifically for CAPER reports:
 - There will be a fifteen (15)-day comment period once the CAPER is made available to the public prior to submitting the report to HUD;
 - The CAPER will be available online at the City Human Services Department's website; and
 - Copies will be mailed to individuals by request by calling 206-684-0288 or e-mailing the request to blockgranst@seattle.gov.
- **All comments will be carefully considered.** In preparing the CAPER for submission to HUD, consideration will be given to all comments and views expressed by the public. The CAPER that is submitted to HUD will have a section that summarizes all citizen comments or views in addition to explanations why any comments were not accepted.

III. SUBSTANTIAL AMENDMENTS

The City of Seattle must specify the criteria it will use for determining what changes in the planned or actual activities of the Consolidated Plan constitute a Substantial Amendment to the Consolidated Plan. The following describes those criteria and the procedures for citizen notification and comment on such proposed Substantial Amendments prior to the implementation of such amendments.

Criteria

Changes in the City of Seattle's Consolidated Plan that constitute Substantial Amendments include only the following:

- A change in the use of CDBG funds from one eligible activity to another; or
- Any changes in excess of \$50,000 in the amount allocated to any project or activity as shown in the Proposed Annual Action Plan (or in any allocation list subsequently adopted by the City Council).

Procedure

- **Each Substantial Amendment requires a public notice period.** Prior to the adoption of any Substantial Amendment to the City's Consolidated Plan, the City shall publish in the *Daily Journal of Commerce*, a "Notice of Substantial Amendment to the Consolidated Plan," which will identify the activities involved and the nature of the substantial amendment to be implemented. The notice will advise citizens that they have a period of thirty (30) days to seek additional information or to comment on the change by writing to the address below.

- **Substantial Amendments must be adopted by the City Council after all comments are considered.** Before adopting a proposed Substantial Amendment, the City shall consider the comments received in writing and oral comments at public hearings and make modifications to the proposed substantial amendment where appropriate. All Substantial Amendments shall be implemented only after the City Council has adopted the Substantial Amendment by resolution or ordinance. Amendments to the Consolidated Plan that are not substantial may be submitted for City Council approval at the discretion of the HSD Director. The final adopted Substantial Amendment shall be made available to the public, and a copy of the amendment shall be forwarded to HUD in the form of an amendment to the City's Consolidated Plan. A summary of the comments or views received, and a summary of any comments or views not accepted and the reasons those comments were not accepted, shall be attached to the Substantial Amendment and submitted to HUD.

IV. CHANGING THE CITIZEN PARTICIPATION PLAN

Substantial Amendments to the Citizen Participation Plan can be made only after the public has been notified of intent to modify it, and only after the public has had a reasonable opportunity to review and comment on proposed substantial change. Substantial Amendments to the Citizen Participation Plan must be adopted by City Council.

Complaint Procedures

Written complaints from the public about the Consolidated Plan, amendments or the performance report will receive a meaningful, written reply within fifteen (15) working days. The public may write to:

CDBG Administration Office
City of Seattle Human Services Department
P.O. Box 34215
Seattle, Washington 98124-4215

V. SECTION 108 LOAN GUARANTEE PROJECTS

Technical Assistance

- **The City will provide technical assistance to proposers.** The City will provide technical assistance to groups who are developing proposals that may benefit from and be eligible for Section 108 Loan Guarantee Fund assistance. The City will provide assistance through the Office of Economic Development (OED) or through a contracted assistance provider. Technical assistance will include an initial review of the proposed project and a financial and regulatory feasibility assessment. The level and type of assistance will be determined at the discretion of the OED.

Public Hearings

- **Two public hearings will be held for the Section 108 Loan Guarantee program.** All Section 108 Loan Guarantee applications must be approved by the City Council. The public hearing for each Section 108 Loan Guarantee Program application will be held in conjunction with a Council committee meeting or briefing regarding a resolution that authorizes the application to be submitted to HUD. Based on input from the public and the Council committee regarding the proposed application, the City will consider comments from the public hearing and modify the application if appropriate.
- **Each project will also be reviewed at a public hearing.** Each individual project proposed to be assisted with Section 108 Loan Guarantee will be reviewed at a public hearing held in conjunction with the City Council committee that will vote on the ordinance authorizing the contractual agreements to implement the loan proposal (after HUD's approval of the City's Section 108 Loan Guarantee application.)
- **Accommodations will be made for people with special needs.** For Section 108 Loan Guarantee application hearings, the City will provide the appropriate accommodations if the project affects non-English speaking persons. Translators will be provided for people who do not speak English when requests are made at least five working days prior to a hearing. For public hearings specific to an application, the City will work with applicable community-based development organizations to conduct outreach to non-English speaking persons. In addition, community members can call (206) 233-3885 to make arrangements for translated materials and recordings. The public announcement will also indicate services that are accessible for physically disabled individuals (print and communication access will be provided upon request).

Location of Hearings

- **The Section 108 Loan Guarantee application hearings will be held at the City of Seattle's Council Chambers.** Every attempt will be made to schedule these hearings during evening hours. The City will provide contact information that includes a phone number, address and an email address for people who wish to provide additional feedback or cannot attend the public hearing.

Notices of Public Hearings

- **Notice will be provided for Section 108 Loan Guarantee application public hearings.** Notices of Section 108 Loan Guarantee application public hearings will be published in the *Daily Journal of Commerce* and any applicable local or ethnic newspapers fifteen (15) days in advance of the hearing. All notices will include the amount of guaranteed loan funds expected to be made available for the coming year (including program income anticipated to be generated by the activities carried out with guaranteed loan funds) and the amounts proposed to be used for activities that benefit low- and moderate-income persons.

All notices for program application hearings will include:

- A description of the proposed activity, the amount of the guaranteed loan, and any program income to be generated; and
- A citation of the National Objective (benefit to low- and moderate-income persons, elimination of slum and blight or urgent need) and the activity eligibility (e.g., area benefit, housing, jobs, limited clientele, etc); and whether the activity will result in displacement. If the project displaces individuals, the public hearing notice will either detail the City’s displacement plans or provide information on how to access the displacement plan.
- **If substantial changes are to be made to the original 108 Loan application, a public notice of the hearing/application will describe the substantial changes that are being proposed.** A substantial change to the Section 108 Loan Guarantee application is defined as any change to the borrower, loan amount, project activity, project location, fees, term and security.

Availability of Application

- **The proposed application and supporting documents will be made available to the public.** A proposed application and supporting documents will be made available to the public two weeks prior to the public hearing (Council committee meeting) through either a direct request for information from the Office of Economic Development (OED) or through the City of Seattle’s web site, which will be enumerated in the public notice. A copy of the final application, as submitted to HUD, will be available to the public by request at OED.

Grievances and Complaints

- **The City will respond to all written complaints.** The Office of Economic Development will respond to any written citizen grievances or complaints within **fifteen (15)** days of receipt of such notice, where practicable. In all public notices and during the public hearings, the City will make available contact information for citizens who wish to express any grievances or complaints regarding the project.

Public Participation

- **The City encourages citizen participation, particularly by low- and moderate-income persons.** The processes that will be used to encourage and carry out public participation are described under “Encouraging Citizen Participation” as found elsewhere in this Plan. In addition, the City will encourage public participation by using the City’s network of community-based development organizations, which represent many of the geographic areas in which Section 108 projects are located.

VI. RESIDENTIAL ANTI-DISPLACEMENT AND RELOCATION ASSISTANCE

Seattle will minimize displacement of families and individuals from their homes and neighborhoods as a result of projects discussed in the Consolidated Plan and projects that are funded through Section 108 Loan Guarantee assistance.

- **Projects that receive funds from CDBG** (Community Development Block Grant), HOME (Home Investments Partnerships Program), UDAG (Urban Development Action Grant) or a Section 108 Loan Guarantee (funds awarded under section 108 of the Housing and Community Development Act of 1974) or funding from any program income that may accrue from these programs, the City has adopted a Residential Antidisplacement Plan and Relocation Assistance Policy that applies to such projects and that specifies the levels of relocation assistance available. (See Ordinance 119163).
- **Projects included in the Consolidated Plan that do not receive funds from CDBG, HOME, UDAG or Section 108 Loan Guarantee funds**, the City has other ordinances in place that may apply and that may require relocation assistance for any persons displaced as a result of certain projects. For any projects that involve City-funded acquisition of property that may also include state or federal funds, SMC chapter 20.84, which provides for relocation assistance in certain instances, applies and specifies relocation assistance available.
- **Projects that do not involve state or federal assistance that involve demolition, change of use, substantial rehabilitation, or removal of subsidized housing restrictions that may result in displacement**, SMC chapter 22.210 applies and provides for relocation assistance to low-income renter households. For projects that may involve displacement of renters from residential rental projects converting to condominiums, SMC chapter 22.903 applies and provides for relocation assistance to such persons.