

CITIZEN PARTICIPATION PLAN

City of Gresham, City of Portland, and, Multnomah County (Consortium)

I. Overview

This Citizen Participation Plan (CPP) is a framework and process for public involvement. The goal is to involve all interested local citizens in the development and implementation of the housing and community development programs of all the jurisdictions in the Consortium: City of Gresham, City of Portland, and Multnomah County. The CPP focuses on public involvement in the Consolidated Plan process because the Five-Year Consolidated Plan and Annual Action Plans, when approved by the County Commission and the City Councils of the Cities of Portland and Gresham, govern the allocation of federal US Department of Housing & Urban Development funds.

The CPP anticipates that each jurisdiction in the Consortium will have jurisdiction-specific processes for local issues and for selection of CDBG/HOME projects. This Plan describes what the three jurisdictions will do to encourage public participation in the development and amendment, if any, of the Five-Year Consolidated Plan and Annual Action Plans, and in the review of their accomplishments. This Plan recognizes that citizen participation is an integral component of the Five-Year Consolidated Plan effort. The Consortium will take appropriate actions to encourage the participation of all of its citizens, especially:

- Low and moderate-income persons, particularly those living in areas where CDBG/HOME funds are proposed to be used,
- Residents of predominantly low- and moderate-income neighborhoods,
- Black, Indigenous and People of Color (BIPOC)
- Non-English-speaking persons,
- Persons with disabilities, and
- Residents of public and assisted housing developments.

The CPP offers numerous opportunities for citizens to contribute information, ideas, and opinions about ways to improve our neighborhoods, promote housing affordability, and enhance the delivery of public services to local residents.

The provisions of the CPP fulfill statutory and regulatory requirements for citizen participation specified in the US Department of Housing and Urban Development's Rules for the Consolidated Plan, the Community Development Block Grant (CDBG) Program, the HOME Investment Partnerships (HOME) Program, and the Emergency Solutions Grant (ESG) Program.

This Citizen Participation Plan (CPP) is the guiding document for the Consortium's Consolidated Plan 2021-25. Since March 2020, the United States has been under a state of public health crisis due to the COVID-19 Pandemic. Consequently, to ensure the safety of the Consortium public while balancing

citizen participation that is integral to the plan process, the CPP includes a section on citizen participation during this ongoing Pandemic and similar potential emergency situations that may make providing longer public noticing and comment period difficult and may also pose challenges to holding in-person public hearings and meetings.

II. Public Hearings and Meetings

The Consortium will conduct at least two public hearings each year to obtain citizens' views and to respond to comments and questions. The hearings will take place at different stages of the consolidated planning process and together address:

- Housing and community development needs,
- The proposed use of program funds, and
- Program performance during the past year.

At least one hearing will be held in the Fall to review Consortium needs and one late Spring to review projects that may be funded for the following fiscal year. Members of the Consortium may elect to hold additional public hearings or meetings as needed. Members of the Consortium may hold their meetings jointly or individually, as best meets the needs of each community.

Every effort will be made to ensure that public hearings are inclusive. Hearings will be held at convenient times and locations, preferably in the evening or on weekends, and in places where people most affected by proposed activities can attend. The Consortium will utilize public hearing facilities that are accessible to persons with mobility impairments. If reasonable notice, of at least 5 days, is given before a hearing date, the Consortium will provide appropriate materials, equipment, and interpreting services to facilitate the participation of non-English speaking persons and persons with visual and/or hearing impairments. Depending on available resources and staffing, the Consortium may exceed these basic requirements

The jurisdictions may hold additional public meetings/hearings as deemed necessary throughout the entire Consolidated Plan planning process.

All public hearings and public meetings associated with the Consolidated Planning process will conform to the Oregon Open Meetings Law.

III. Publication of the Proposed Consolidated Plan and Related Action Plans and Consolidated Annual Performance and Evaluation Report (CAPER)

The Consortium will publish its proposed Consolidated Plan, subsequent Action Plans and annual performance report in a manner that affords citizens, public agencies, and other interested parties a reasonable opportunity to examine its contents and submit comments. The jurisdictions will provide a reasonable number of free copies of plans and reports to citizens, community-based partnering organizations and groups requesting it.

Once approved by HUD, all plans and reports will be available online and on the jurisdiction's websites and in hard copy in the jurisdiction's offices. Additionally, interested parties may contact the jurisdiction for an electronic copy of the plans and reports. Jurisdictions may also provide copies of plans and reports at libraries and other public places.

IV. Public Comments on the Proposed Consolidated Plan, Annual Action Plans, Substantial Amendments to plans and Consolidated Annual Performance and Evaluation Report (CAPER)

The Consortium will receive comments from citizens on its proposed Plans, Substantial Amendments to Plans and annual performance for a period of 30 days prior to submission of the plan to HUD. All comments or views of citizens received in writing, via mail or email, or orally at public hearings, will be considered in preparing the final Consolidated Plan. A summary of these comments or views, and a summary of any comments or views not accepted and the reasons, therefore, shall be attached to the final Plans.

V. Public Notice

Notice of public hearings, meetings and other events will be published in at least one general circulation newspaper and on the jurisdiction's website at least 7 days prior to the event. Publication may also occur in culturally specific newspapers, on-site at various locations in the jurisdictions, via the Consortium members Website, Facebook, or Twitter. The notice will include the locations of plans and reports for review.

Notice will also be published, as indicated above, announcing the 30-day comment period for the Consolidated Plan, Annual Action Plan, Substantial Amendments to the Plans and the CAPER.

VI. Public Outreach

An informed citizenry is critical to effective and responsive housing and community development programs. Efforts to educate residents and empower their participation are an ongoing element of the consolidated planning process.

Public outreach and consultation will occur with all interested parties and those required by the Consolidated Plan. HUD required outreach and consultation includes: public and private agencies that provide assisted housing, health services, fair housing services for children, veterans, youth, elderly, persons with disabilities, persons living with HIV/AIDS and their families, the Continuum of Care (CoC) and other agencies that provide homeless assistance and homelessness prevention services. Outreach may occur via focus groups, surveys, face-to-face meetings with non-profit partners, neighborhood associations, public school PTAs in low-income areas, and those in predominately low-income neighborhoods.

VII. Amendments to the Consolidated Plan and Action Plan

The Consortium will amend its Consolidated Plan when any of the following events occur:

Minor Amendment – A Minor Amendment shall occur when either the entitlement allocation(s) or funded project/ activity is adjusted by an amount equal to or less than \$25,000 or less than 25% whichever is the higher threshold. This flexibility helps the Consortium to accommodate funding changes to projects/activities that are allocated small amounts of funding and hence may hit the 25% threshold very quickly. Minor Amendments will be discussed in the CAPER for that reporting year.

Substantial Amendment – Changes to the Consolidated Plan shall be considered Substantial when:

- The budget for the funded activity is adjusted by more than 25% or over \$25,000, whichever is the higher threshold.
- The jurisdictions change allocation priorities or methods of distributing HUD entitlement funds
- Jurisdictions utilize entitlement funds (including program income) to carry out an activity not previously described in the Action Plan; or
- Changes to the Consolidated Plan involve the purpose, scope, location, eligibility, or type of beneficiaries of an activity.

Substantial Amendments require similar Public Notice and Public Comment as described earlier in the CPP.

VIII. Citizen Participation during Pandemic & Other Emergencies

The COVID 19 Pandemic has impacted how citizen participation and comments are solicited. The amended participation plan was largely shaped by guidance from health experts and regulatory waivers from HUD¹ that allowed for appropriate changes like conducting virtual community needs hearings, providing a reasonable notice period and allowing for a shortened comment period.

The Portland Consortium will continue that model for the duration of the Pandemic. Similarly, in case of another emergency and/or natural disaster that presents a serious and immediate threat to the health and welfare of area residents, the Consortium reserves the ability to utilize any waivers relating to citizen participation that HUD may issue in relation to that emergency and/or natural disaster.

IX. Technical Assistance

Groups or individuals interested in obtaining technical assistance to develop project proposals or apply for funding assistance through HUD entitlement programs covered by the Consolidated Plan may contact the staff of the Consortium's jurisdictions. Such assistance may be of particular use to neighborhood improvement organizations, non-profit service providers, and for-profit and non-profit housing development groups that serve or represent persons of low and moderate-income. Consortium members may conduct workshops offering basic program information and materials to potential project sponsors, and staff from offices are available to provide in-depth guidance and assistance to applicants and program participants on an on-going basis.

X. Displacement

Displacement of persons by activities or projects funded through HUD entitlement programs is discouraged by all members of the Consortium. All written materials regarding funding programs, all workshops for potential applicants, and all application materials include information on anti-displacement policies and caution applicants to discuss any activities that may entail displacement with the local jurisdiction staff in advance of submitting funding proposals. In the event that displacement is unavoidable, full benefits and assistance will be provided according to appropriate provisions of Uniform Relocation Act regulations.

XI. Access to Records

To the extent allowed by law, interested citizens and organizations shall be afforded reasonable and timely access to records covering the preparation of the Consolidated

¹ [CPD Memo: Revision, Extension, and Update of April 2020 Memo - Availability of Waivers and Suspensions of the HOME Program Requirements in Response to COVID-19 Pandemic - HUD Exchange](#)

Plan and Action Plan, project evaluation and selection and annual performance reports. In addition, materials on entitlement programs covered by the Consolidated Plan, including activities undertaken in the previous five years, will be made available to any member of the public who requests information from the City of Portland, City of Gresham or Multnomah County. A complete file of citizen comments will also be available for review by interested parties.

After receiving notice of HUD's approval of the Consolidated Plan, Action Plan and annual performance reports, members of the Consortium will post final versions on their websites.

XII. Citizen Complaints

All materials relating to the Consolidated Plan and Action Plan, and to specific programs governed by the plan shall include the names and telephone numbers of appropriate persons designated as lead contacts. Inquiries, complaints, or grievances raised by members of the public will be addressed immediately, with every effort made to satisfactorily resolve issues prior to their becoming the subject of a formal complaint. Any written complaint or grievance will be investigated promptly and reviewed by the appropriate program manager or department head. A written response will be made to the complainant within at least fifteen (15) working days, where practicable. Public review materials and performance reports will include data, as appropriate under confidentiality regulations, on any written complaints received and how each was resolved.

XIII. Amendments to the Citizen Participation Plan

The Consortium will provide citizens with a reasonable opportunity to comment on any substantial amendments to the Citizen Participation Plan.

XV. Availability of the Citizen Participation Plan

Copies of the Citizen Participation Plan may be obtained by contacting any of the Consortium Partners.

Contact Information:

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(503) 823-2375

(503) 823-2387

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Housing Program Coordinator: Uma Krishnan, uma.krishnan@portlandoregon.gov

Visit: [Consolidated Plan for Portland, Gresham, and Multnomah County | Portland.gov](#)

Director: Shannon Callahan, Shannon.Callahan@portlandoregon.gov

GRESHAM COMMUNITY DEVELOPMENT DEPARTMENT

1333 NW Eastman Parkway

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Visit: www.greshamoregon.gov/communityrevitalization

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MULTNOMAH COUNTY DEPARTMENT OF COUNTY HUMAN SERVICES

209 SW 4th Ave. Suite 200

Portland OR 97204

(503) 988-6295

(503) 988-3707

CDBG Coordinator: May Cha, may.p.cha@multco.us

Visit: [Community Development Block Grant \(CDBG\) | Multnomah County \(multco.us\)](#) -

Youth and Family Services Division

Director: Peggy Samolinski, peggy.l.samolinski@multco.us