

Snohomish County Urban County Consortium
Housing and Community Development

Citizen Participation Plan

Adopted May 12, 2010 via Motion 10-239
Amended August 28, 2013 via Motion 13-327
Amended November 17, 2017 via PAB

Introduction. Snohomish County, in consortium with 19 cities and towns within the county, receives funds annually from the U.S. Department of Housing and Urban Development (HUD) on an entitlement basis under the Community Development Block Grant (CDBG), HOME Investment Partnerships (HOME) and Emergency Shelter Grant (ESG) programs. The funds may be used to support affordable housing projects and non-housing community development projects (such as public facility improvements, infrastructure improvements, public services, and economic development) in our community. The funds must be used primarily to benefit low- and moderate-income persons, including but not limited to, persons with special needs such as abused children, battered spouses, elderly persons, homeless persons, illiterate adults, persons living with HIV/AIDs, migrant farm works, and severely disabled adults.

Snohomish County is the official grant recipient (lead agency) which contracts with HUD for these funds on behalf of the Consortium. In this capacity, Snohomish County is responsible for the overall administration, planning, monitoring, and reporting requirements for these programs on behalf of the Consortium.

The County acts through a five-member elected County Council to establish policies governing use of HUD funds and to select and contract with subgrantees to carry out housing and community development activities. Subgrantees include local governments (may include county departments), public agencies, and private non-profit organizations (including faith-based organizations). A nine-member Housing and Community Development Policy Advisor Board (PAB) representing the County and units of local government participating in the consortium assists the Council in its responsibilities. The PAB provides a public forum for developing, evaluating and recommending policy issues and recommending activities for funding for Council action. The PAB receives advice on program technical issues and recommendations for activities to be funded from its subordinate Technical Advisory Committee (TAC). The TAC consists of representatives of the local governments within the Consortium and the Housing Authority of Snohomish County as well as citizen representatives. The Snohomish County Human Services Department (HSD) and the Office of Housing, and Community Development (OHCD) within the HSD staffs the TAC and PAB and manages the competitive application processes for the County's HUD funds. It is also responsible for contracting, monitoring and compliance procedures.

Jurisdictions that receive CDBG, HOME, and ESG funds are required to prepare a Housing and Community Development Consolidated Plan (Consolidated Plan) and to Affirmatively Further Fair

Housing (AFFH). The plan Consolidated Plan identifies the community's affordable housing and non-housing community development (public facility, infrastructure, public service, and economic development) needs and determines priorities, strategies and objectives to guide investment of these funds over a five-year period to help meet the identified needs. In addition, for each year of the five-year Consolidated Plan, an Annual Action Plan is developed. The Annual Action Plan is required to include the Consortium's spending plan for the next program year and to establish that the allocations are responsive to the strategies and objectives set forth in the five-year Consolidated Plan. It includes a description of the specific activities to be funded and the amount and type of funding awarded to each activity. For the purposes of this citizen participation plan the term "Consolidated Plan" will refer to both the five year strategic plan and the annual plans.

The AFFH strategy sets forth a meaningful and transparent process to identify and understand local and regional fair housing issues and to set goals for improving fair housing choice and access to opportunity. The strategy will support the development of the Assessment of Fair Housing (AFH), which identifies fair housing issues and related contributing factors, to establish fair housing priorities and goals in the upcoming planning period.

Snohomish County believes that the participation of the general public in the development of the AFH, any revisions to the AFH, the Consolidated Plan, any substantial amendments to the Consolidated Plan and the plan's evaluation, is an essential aspect of the program. Only through input from the public, especially those populations that the AFH and the Consolidated Plan are designed to principally benefit, can the County ensure that the allocation of limited federal community assistance funds will be governed by prevailing community priorities. This Citizen Participation Plan (CPP) is designed to encourage the maximum degree of meaningful public participation in Snohomish County's administration of the programs subject to the AFH and the Consolidated Plan.

For additional information on the CPP, the AFH, or any aspect of the Consolidated Plan or the CDBG, HOME, and ESG programs, please contact the Snohomish County Human Services Department (HSD) Office of Housing, Homelessness and Community Development (OHCD), 3000 Rockefeller Avenue, M/S 305, Everett, WA 98201. Telephone numbers are: (425) 388-7454 (voice), (425) 388-3700 (TDD).

Purpose. The purpose of this Citizen Participation Plan is to provide for and encourage residents to participate in the development of the AFH, any revisions to the AFH, the Consolidated Plan, any substantial amendments to the Consolidated Plan and the Consolidated Annual Performance and Evaluation Report (CAPER). The CPP is designed especially to encourage participation by low- and moderate-income persons, particularly those living in slum and blighted areas and in areas where Community Development Block Grant funds are proposed to be used and by residents of predominantly low- and moderate-income neighborhoods, as defined by Snohomish County. The CPP encourages the participation of all of the County's residents, including minorities and non-English speaking persons, as well as persons with disabilities. In addition, Snohomish County will refer to the approved Consolidated Plan as a means to assess predominant languages spoken in

the jurisdiction and to identify any need for translation of notices, summaries, and other vital documents.

The CPP seeks, in conjunction with consultation with public housing authorities, the participation of residents of public and assisted housing developments, in the process of developing and implementing the AFH and the Consolidated Plan, along with other low-income residents of targeted revitalization areas in which the developments are located. The County shall make an effort to provide information to the public housing agencies about the AFH, Affirmatively Furthering Fair Housing (AFFH) strategy, and Consolidated Plan activities related to their developments and surrounding communities so that the public housing agencies can make this information available at an annual public hearing to the extent feasible.

The CPP provides residents with a reasonable opportunity to comment on the citizen participation plan and on substantial amendments to it. The CPP will be made generally available to the public and will be made available in a format accessible to persons with disabilities, upon request.

Elements. Citizen comment on the citizen participation plan and amendments. Proposed amendments to the CPP will be subject to a public comment period prior to being acted upon by the Housing and Community Development Policy Advisory Board (PAB). Proposed amendments will be advertised in a newspaper of general circulation within Snohomish County for a period of thirty days and notice of the proposed amendment will be sent electronically to: the mailing list of interested agencies and persons maintained by OHCD, Everett/Snohomish County Homeless Policy Task Force mailing list maintained by OHCD, and the Housing Consortium of Everett and Snohomish County. Copies of the proposed amendments, together with a copy of the full text of the existing CPP, will be available to the public on the County's Human Services Department OHCD website and in hard copy upon request. The material will be made available in a format accessible to persons with disabilities upon request. Staff will evaluate commentary received and a written record maintained regarding disposition of written commentary and testimony. The PAB will act upon the amendments. Such action may be adoption, rejection, or a remanding to staff for additional work. If remanded for additional work, the revised amendments will be subject to the public comment process outlined above.

Development of the AFH and Consolidated Plan. Snohomish County wishes to ensure the participation of all interested and affected parties in development of the AFH, and both the five-year Consolidated Plan and the annual action plans which implement it. Before Snohomish County adopts an AFH, the County will make available to residents, public agencies, units of local government and other interested parties information that includes access to the HUD-provided data and any other supplemental information used in the development of the AFH. Before Snohomish County adopts a consolidated or annual plan, the County will make available to residents, public agencies, units of local government and other interested parties information that includes the amount of assistance the County expects to receive (including grant funds and program income) and the range of activities that may be undertaken, including the estimated

amount that will benefit persons of low- and moderate-income. For the AFH, the Consolidated Plan and annual action plans, this will be accomplished by advertising the information in one or more newspapers of general circulation; by sending electronic notice to: the mailing list of interested agencies and persons maintained by OHCD, the Everett/Snohomish County Homeless Policy Task Force mailing list maintained by OHCD, and the Housing Consortium of Everett and Snohomish County; by posting a notice on the County's Human Services Department OHCD website; by maintaining the information for public inspection at the Snohomish County Human Services Department; and by e-mailing or mailing the information to agencies and individuals upon request. The information will be made available in a format accessible to persons with disabilities and non-English speaking persons, as feasible.

In addition, residents are encouraged to participate in the development of the Consolidated Plan Annual Action Plans each year through participation in the Technical Advisory Committee (TAC). The TAC has eight seats for citizen representatives which are selected by the PAB through an application process. There are two seats representing each of the following groups: low-income persons, persons with disabilities, senior citizens, and minority persons. At least one of the citizen representatives is a homeless or formerly homeless person, or represents such groups.

Some programs governed by the Consolidated Plan have the potential to displace residents of Snohomish County. The County maintains a policy to minimize the displacement of persons and to assist any persons displaced. The policy specifies the types and levels of assistance the County will make available (or require others to make available) to persons displaced. It is part of the County's public participation process to make copies of that policy available upon request. The policy is also available for public inspection at the Snohomish County Human Services Department. The displacement policy will be made available in a format accessible to persons with disabilities and non-English speaking person, as feasible.

Publication of the Proposed AFH and Consolidated Plan. Snohomish County will publish the proposed AFH and Consolidated Plan in a manner that affords residents, public agencies and other interested parties a reasonable opportunity to examine the content and to submit comments. This will be accomplished by publishing a summary of the proposed AFH and the Consolidated Plan in one or more newspapers of general circulation; by sending the summary electronically to: the mailing list of interested agencies and persons maintained by OHCD, the Everett/Snohomish County Homeless Policy Task Force mailing list maintained by OHCD, and the Housing Consortium of Everett and Snohomish County; by making copies of the proposed AFH and Consolidated Plan available at libraries, government offices, public places and on the Snohomish County Human Services Department OHCD website. The summary will describe the contents and purpose of the AFH and the Consolidated Plan and will include a list of the locations where copies of the entire proposed AFH and the Consolidated Plan may be examined. In addition, the County will provide a reasonable number of free copies of the AFH and Consolidated Plan to residents and groups that request it. The AFH and Consolidated Plan will be made available in a format accessible to persons with disabilities and non-English speaking person as feasible.

Public Comment on the Proposed AFH and the Consolidated Plan. Snohomish County will accept comments from residents on the proposed AFH and Consolidated Plan for a period of not less than 30 days beginning with the date of official publication. The County will consider any comments or views of residents received in writing, or orally at the public hearings, in preparing the final AFH and the Consolidated Plan. A summary of these comments or views and a summary of any comments or views not accepted and the reasons therefore, will be attached to the final AFH and the final Consolidated Plan.

Amendments to the Consolidated Plan and Revisions to the Assessment of Fair Housing

From time to time it is necessary to amend the Consolidated Plan. Amendments are characterized as either substantial or non-substantial and the County's policies for public participation differ for the two amendment categories.

Substantial amendments are defined as follows:

A substantial amendment to a Consolidated Plan is a change involving any of the following actions:

1. Allocation of funds, from any one or combination of the Community Development Block Grant (CDBG), HOME Investment Partnership (HOME), and Emergency Solutions Grant (ESG) programs, in an amount greater than \$50,000 to a new activity (that is, an activity not currently identified and allocated funds under any of these grant programs in an Action Plan).
2. Allocation of additional funds to an activity currently identified and allocated funds in an Action Plan from any one or combination of CDBG, HOME, and ESG funds, of more than \$100,000 or an amount which raises the total commitment of all such funds to the activity by more than 50 percent of the originally planned total County contribution, whichever is greater; whether or not accompanied by a substantial change in other characteristics identified in (3), (4), (5), (6), or (7) below.
3. A change of more than 50% in the scope or scale of an activity or in the number of intended beneficiaries of an activity as identified in an Action Plan.
4. A change of more than 50% in the characteristics of the intended beneficiaries of an activity as identified in an Action Plan, including:
 - a. The HUD recognized income levels or
 - b. The target population (e.g. renters, homeowners, elderly persons, etc.).
5. A change in the purpose of an activity such that the activity will no longer principally address the Consolidated Plan priority, strategy, and objective identified for the activity in an Action Plan or the activity's ultimate objective.

6. A change in the location identified in the Action Plan of a funded capital rental housing unit development, capital homeownership unit development, public facility, or infrastructure activity, which includes a change:
 - a. From one city to another city;
 - b. From a city to unincorporated Snohomish County;
 - c. From unincorporated Snohomish County to a city;
 - d. From a project site not yet identified to an identified project site.
7. A change in use of CDBG funds from one eligible activity to another, as eligible activities are defined under the CDBG regulation at 24 CFR 570.
8. The addition of a new priority, strategy or objective or the deletion of an existing priority, strategy or objective in the Strategic Plan section of the current Consolidated Plan.

Revisions to the Assessment of Fair Housing. An AFH previously accepted by HUD must be revised and submitted to HUD for review, within 12 months, under the following circumstances:

1. A material change occurs. A material change is a change in circumstances in the jurisdiction of a program participant that affects the information on which the AFH is based to the extent that the analysis, the fair housing contributing factors, or the priorities and goals of the AFH no longer reflect actual circumstances. Examples include Presidentially declared disasters, under title IV of the Robert T. Stafford Disaster Relief and Emergency Assistance Act (42 U.S.C. 5121*et seq.*), in the program participant's area that are of such a nature as to significantly impact the steps a program participant may need to take to affirmatively further fair housing; significant demographic changes; new significant contributing factors in the participant's jurisdiction; and civil rights findings, determinations, settlements (including Voluntary Compliance Agreements), or court orders; or
2. Upon HUD's written notification specifying a material change that requires the revision.

Snohomish County will provide the public with reasonable notice of, and an opportunity to comment on, substantial amendments and revisions. Notice of intent to enact a substantial amendment to the Consolidated Plan or a revision to the AFH will be published in summary form in one or more newspapers of general circulation; by sending an electronic copy of the notice to: the mailing list of interested agencies and persons maintained by OHCD, the Everett/Snohomish Continuum of Care distribution list maintained by the Office of Community and Homeless Services (OCHS), and the Housing Consortium of Everett and Snohomish County; and by making copies of the proposed amendment or revision available at libraries, government offices and public places and on the Snohomish County Human Services Department OHCD/OCHS website. The notice will describe the contents and purpose of the amendment or revision. The notice will be made available in a format accessible to persons with disabilities, and non-English speaking persons, as feasible.

The County will receive comments on the substantial amendment for at least 30 days, commencing with official publication of the notice of intent, before the amendment is implemented or the revision is sent to HUD. The County will consider any comments or views of the public received in writing, or orally at public hearings, if any, in preparing the substantial amendment of the Consolidated Plan or revisions to the AFH. A summary of these comments or views and a summary of any comments or views not accepted and the reasons therefore, will be attached to the substantial amendment of the Consolidated Plan or the revision to the AFH, as applicable. The County Council has approval authority for substantial amendments and revisions.

Other amendments made to the Consolidated Plan which do not fall under the category of a substantial amendment as defined above will be considered a non-substantial amendment. This includes, but is not limited to, amendments involving a change in the allocation priorities, a change in the method or distribution of funds, the addition of a new activity not currently identified in an Action Plan of \$50,000 or less, the allocation of additional funds to an activity currently identified in an Action Plan in an amount under the substantial amendment threshold, a change of 50% or less in the scope or scale of a project, a change of 50% or less in the characteristics of the intended beneficiaries of a project, a change in the purpose of an activity that is under the substantial amendment threshold, a change in the location of a currently funded activity that is not defined as a substantial amendment, a change in the source of funding for an activity from one source to another source (including program income) between CDBG, HOME, and ESG funds, cancellation or partial cancellation of funding for an existing project, a change in Consolidated Plan priorities, strategies, or objectives that are not defined as a substantial amendment, data updates, and technical/clerical error corrections. Non-substantial amendments do not require a public notice of intent or a public review and comment period prior to approval. The Director of the County's Human Services Department has approval authority for non-substantial amendments. Non-substantial amendments will be considered in accordance with PAB and Human Services Department policies, will become part of the administrative record after approval, and will be available for public inspection on request at the Snohomish County Human Services Department.

Performance and Evaluation Reports. Snohomish County is required to prepare an annual performance report for HUD and encourages residents to review and comment on the report before it is transmitted to HUD. This report is known as the Consolidated Annual Performance and Evaluation Report (CAPER). Annually the County will publish a notice of intent to submit its performance report in one or more newspapers of general circulation; will send notice electronically to: the mailing list of interested agencies and persons maintained by OHCD, the Everett/Snohomish County Homeless Policy Task Force mailing list maintained by OHCD, and the Housing Consortium of Everett and Snohomish County; and will make copies of the report available at libraries, government offices and public places and on the Snohomish County Human Services Department OHCD website. The County will receive comments on the performance report for a period of not less than 15 days prior the date the performance report is submitted to HUD. The County will consider any comments or views of residents received in writing, or orally

at public hearings in preparing the performance report. A summary of these comments or views shall be attached to the performance report.

Public Hearings. The County will provide for at least two public hearings per year to obtain residents' views and to respond to proposals and questions, to be conducted at a minimum of two different stages of the program year. Together, the hearings will address housing and community development needs, development of proposed activities, proposed strategies and actions for affirmatively furthering fair housing consistent with the AFH, and review of program performance. To obtain the views of residents on housing and community development needs, AFH-related data and affirmatively furthering fair housing in the Consortiums' housing and community development programs, including priority non-housing community development needs, at least one of these hearings will be held before the proposed Consolidated Plan and AFH are published for comment.

Public notice of intent to hold the hearings will be accomplished by publishing a notice in one or more newspapers of general circulation a minimum of two weeks prior to the hearings; by sending an electronic copy of the notice to: the mailing list of interested agencies and persons maintained by OHCD, the Everett/Snohomish County Homeless Policy Task Force mailing list maintained by OHCD, and the Housing Consortium of Everett and Snohomish County; and by posting the notice on the Snohomish County Human Services Department OHCD website. The notice will contain sufficient information about the subject of the hearing to permit informed comment. The hearings will be held at times and locations convenient to potential and actual beneficiaries. Normally, the hearings will be held in the Snohomish County Administration Building located at 3000 Rockefeller Ave, Everett, Washington. The Administration building is handicapped accessible, located adjacent to public transportation, has adequate parking and is central to a substantial proportion of the County's HUD-eligible population. When appropriate, meetings may be held in other locations to ensure access by potential and actual beneficiaries. The County will make reasonable accommodations for persons with disabilities, upon advance request. The County will also provide interpreters for hearings where a substantial number of non-English speaking residents can reasonably be expected to participate.

Meetings. It is the County's policy to provide residents with reasonable and timely access to local meetings.

Availability to the Public. The Consolidated Plan as adopted, substantial amendments as adopted, the HUD-accepted AFH, revisions to the AFH, performance report 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 Consolidated Plan, HUD accepted AFH, and performance report will be available on the Snohomish County Human Services Department OHCD website. These documents will also be available by contacting the Human Services Department OHCD. Substantial amendments and prior year Consolidated Plans will be available by contacting the Snohomish County Human Services Department OHCD. Snohomish County OHCD may be contacted by writing the Snohomish County Human Services Department at 3000

Rockefeller Avenue, M/S 305, Everett, WA 98201 or by contacting the department point of contact at (425) 388-7454 (voice), (425) 388-3700 (TDD).

Access to Records. The County will provide residents, public agencies and other interested parties with reasonable and timely access to information and records relating to the AFH, Consolidated Plan, and the County's use of assistance under the programs covered by the Consolidated Plan during the preceding five years.

Technical Assistance. The County will provide technical assistance to groups' representative of persons of low- and moderate-income that request such assistance in commenting on the AFH and in developing proposals for funding assistance under any of the programs covered by the Consolidated Plan. The assistance to be provided will be commensurate with the resources available to the County for provision of such assistance. The County will also provide applicant information workshops as part of the funding rounds for CDBG, HOME, and ESG funds to assist potential applicants in developing their project proposals.

Complaints. Within 15 working days, where practicable, the County will provide a timely, substantive written response to every written resident complaint generated by the Consolidated Plan, amendments, AFH, revisions, and the performance reports or any of the programs it governs.

Use of Citizen Participation Plan. Snohomish County commits itself to follow this citizen participation plan.

Jurisdiction Responsibility. The requirements for citizen participation do not restrict the responsibility or authority of Snohomish County for the development and execution of its AFH or Consolidated Plan.