



# **Citizen Participation Plan**

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Department of Housing and Community Development  
Federal Programs Division  
501-A Boush Street  
Norfolk, Virginia 23510  
Phone: (757) 664-2467  
Web: [www.norfolk.gov/HUDentitlement](http://www.norfolk.gov/HUDentitlement)  
Email: [HUDentitlement@norfolk.gov](mailto:HUDentitlement@norfolk.gov)

# CITIZEN PARTICIPATION PLAN

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# CITIZEN PARTICIPATION PLAN

## SECTION 1: INTRODUCTION

The Citizen Participation Plan sets forth the jurisdiction's policies and procedures for participation by the citizens of the City of Norfolk ("City") in activities funded by three federal programs: the Community Development Block Grant ("CDBG") including the Section 108 Loan Guarantee Program, the Home Investment Partnership Program ("HOME"), and the Emergency Solutions Grant ("ESG") Program.

## SECTION 2: ENCOURAGEMENT OF CITIZEN PARTICIPATION

The City of Norfolk's Department of Housing and Community Development is responsible for assuring that all citizen participation requirements under the federal guidelines are met in the development of the Citizen Participation Plan, the Consolidated Plan or Annual Action Plan, substantial amendments thereto, and Performance Reports. The requirements are set forth in Title 24, Part 91.105, Citizen Participation Plan – Local Governments.

The City of Norfolk will:

- Provide for and encourage citizens to participate in the development of:
  - Any fair housing plan that may be required by HUD to affirmatively further fair housing (including the Equity Plan proposed by HUD on 02/09/2023 in the Federal Register);
  - Any Consolidated or Annual Action Plan;
  - Any substantial amendment to the Consolidated or Annual Action Plan; and
  - Any annual performance report
- The city will especially encourage participation by low-to-moderate income residents (at or below 80% of area median income), particularly those living in areas where CDBG funds are proposed to be used and residents of predominately low-to-moderate income neighborhoods. Predominantly low-to-moderate income neighborhoods are defined as areas where the number of low-to-moderate income residents exceeds 51% of the population, as calculated by census block with American Community Survey data.
- Take appropriate action to encourage participation of minorities, limited English speaking persons, and persons with disabilities. Affirmative marketing activities aimed to reach this population may include but are not limited to:
  - Outreach in coordination with the Norfolk Redevelopment and Housing Authority (NRHA) to residents living in public housing or otherwise supported by NRHA;
  - Outreach in coordination with CDBG, ESG and HOME funded public service providers to their client population; and
  - Outreach to organizations that primarily serve minority, non-English speaking persons and persons with disabilities.
  - Outreach to Civic Leagues serving predominately low-to-moderate income neighborhoods.
- Encourage the participation of local and regional institutions including NRHA, the local Continuum of Care, businesses, developers, nonprofit organizations, philanthropic organizations, and community-based and faith-based organizations.

- Encourage the participation of public and private organizations, including broadband internet service providers, organizations engaged in narrowing the digital divide, agencies whose primary responsibilities include the management of flood prone areas, public land or water resources, and emergency management agencies.
- Ensure that communication of citizen participation events and posting of information will be made available on all available media platforms such as the local newspaper, anchor branch libraries, and the city's mobile web application, so that low-to-moderate income persons are not excluded based on access to digital communication.
- Encourage, in conjunction with NRHA, the participation of residents of public and assisted housing developments (including any resident advisory boards, resident councils, and resident management corporations) along with other low-income residents of targeted revitalization areas in which the developments are located.
- Explore alternative public involvement techniques and quantitative ways to measure efforts that encourage citizen participation.

### **SECTION 3: EQUITY PLAN, CONSOLIDATED PLAN, AND ANNUAL ACTION PLAN DEVELOPMENT**

Every 5 years, the city will affirmatively further fair housing by developing an Equity Plan with robust community engagement, to be defined by the finalized AFFH rule, initially proposed by HUD on 02/09/2023 in the Federal Register (88 FR 8516). The plan will contain an analysis of fair housing issues confronting the community, goals and strategies to remedy the issue. The plan will be made available to residents, public agencies and interested parties. At least 30 days prior to adoption of the Consolidated Plan or Annual Action Plan the city will make available to citizens, public agencies, and other interested parties a draft of these documents. The draft plan(s) will include:

- The anticipated amount of assistance the city expects to receive from the Community Development Block Grant (CDBG), HOME Investment Partnerships Program (HOME) and Emergency Solutions Grants (ESG) including program income.
- The range of activities that may be undertaken, including the estimated amount that will benefit persons of low- to-moderate income.

The city will provide reasonable opportunity for citizens, public agencies, and other interested parties to review and comment on the Draft Consolidated or Annual Action Plan by taking the following steps:

1. The city will publish a summary of the draft Equity Plan, Consolidated Plan or Annual Action Plan in one or more newspapers of general circulation. This summary will describe the contents and purpose of the draft Consolidated or Annual Action Plan and will include a list of the locations where copies of the entire draft plan(s) may be examined.
2. The city will make copies of the draft Consolidated or Annual Action Plan available for examination at all Norfolk anchor branch libraries, at the Department of Housing and Community Development (DHCD) and on the City of Norfolk's HUD Entitlement webpage. However, if under extraordinary circumstances, such as a national emergency declaration, public libraries or other public buildings are closed, the city may consider alternative locations or electronic means of dissemination.

3. The city will take additional appropriate actions to encourage participation of minorities, nonlimited - English speaking persons, and persons with disabilities, as described in Section 2 of this document.
4. The city will consider all comments or views of citizens received in writing, or orally at the public hearings, in preparing the final Consolidated or Annual Action Plan. A summary of these comments or views, and a summary of any comments or views not accepted and the reason, therefore, shall be attached to the final Consolidated or Annual Action Plan.
5. After HUD approves the Consolidated or Annual Action Plan the city will make the document available to the public by posting the final plan on the city's HUD Entitlement webpage.

#### **SECTION 4: ANTI – DISPLACEMENT AND RELOCATION PLAN**

The city will comply with the acquisition and relocation requirements of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended and implement regulations at 49 CFR 24. All the City of Norfolk's Consolidated Plan activities are designed to eliminate (or minimize) the occurrence of displacement. Program guidelines and limitations are structured so that temporary displacement is unlikely.

If an involuntary displacement should occur, it is the City of Norfolk's policy to provide housing referral assistance and, if required, make relocation payments in accordance with local, state and federal law.

#### **SECTION 5: PUBLIC HEARINGS AND NOTICES**

The city will conduct at least two public hearings per year to obtain citizen's views and to respond to proposals and questions. Together, the hearings will address housing and community development needs, the development of proposed activities, proposed strategies and actions for affirmatively furthering fair housing, and a review of program performance.

The first scheduled hearing shall occur at least 30 days prior to the issuance of the draft Consolidated or Annual Action Plan. The purpose of this hearing is to obtain the views of citizens on housing and community development needs (including priority non-housing community development needs) as well as the development of proposed activities and to discuss program performance.

The second public hearing will occur at least 30 days prior to adoption of the Consolidated or Annual Action Plan. This meeting will allow citizens, public agencies, and other interested parties to comment on the draft Consolidated or Annual Action Plan.

Notice of the public hearings will be published in one or more newspapers of general circulation and on the city's website. The city will seek to accommodate non-English speaking or hearing-impaired citizens to the best of its ability upon advanced request of at least 10 days.

Public Hearings shall be held in the City Hall Building, City Council Chambers, and/or other facilities that are handicapped accessible and are centrally located. Under extraordinary circumstances, including but not limited to a national, state, or local emergency declaration, a virtual public hearing may take place. Required notification and comment period for such hearings will adhere to requirements for a regular hearing to the maximum extent possible.

## **SECTION 6: ASSESSMENT OF PERFORMANCE**

At least 15-days prior to submitting the Consolidated Annual Performance Evaluation Report (CAPER) to HUD, the City of Norfolk will publish a notice of availability and opportunity to comment in a newspaper of general circulation.

The draft CAPER will be made available to citizens, public agencies, and other interested parties on the city's website. The city will also take appropriate actions to encourage participation of minorities, nonlimited -English speaking persons, and persons with disabilities, as described in Section 2 of this document.

The city will consider all comments or views of citizens received in writing by the specified deadline in preparing the CAPER. A summary of these comments or views shall be attached to the final CAPER submitted to HUD. It is anticipated that the notice of availability and opportunity to comment will be published in the first or second week of September and the CAPER will be submitted to HUD not later than September 28th each year.

## **SECTION 7: AMENDMENTS TO THE CONSOLIDATED OR ANNUAL ACTION PLANS**

### **A. Amendments in General**

The city shall amend its approved Consolidated or Annual Action Plan whenever it makes one of the following decisions as referenced in 24 CFR, Part 91.505:

- (1) To make a change in its allocation priorities or a change in the method of distribution of funds;
- (2) To carry out an activity, using funds from any program covered by the Consolidated Plan (including program income), not previously described in the action plan portion of the Consolidated Plan; and
- (3) To change the purpose, scope, location, or beneficiaries of an activity included in the Annual Action Plan.

All amendments are limited to changes from one eligible activity to another and all proposed amendments must be reviewed and approved by an official representative of the city. All amendments will be made public, and the city will notify HUD when an amendment has been made. Comments or views of citizens received orally or in writing shall be considered during the amendment process and shall be attached to the amendment.

### **B. Substantial Amendment**

A substantial amendment is defined as a change in the use of CDBG funds that affects more than 10% of the annual funding of the CDBG program for that program year or utilizes funds to establish a new program.

When it has been determined that a substantial change must be made to the Consolidated Plan, it will be published for review in at least one newspaper of general circulation. The city will also take appropriate actions to encourage participation of minorities, nonlimited -English speaking persons, and persons with disabilities, as described in Section 2 of this document. Citizens will have a 30-day period to submit oral

or written responses. A summary of these comments and a summary of any comments or views not accepted will be attached to the substantial amendment.

Upon completion of the substantial amendment process, the city shall notify HUD that an amendment has been made. A copy of the amendment will be provided to the HUD office for the jurisdiction and shall include a transmittal letter signed by an official representative of the city.

#### **C. Procedure for Emergency Declaration**

In the event that a state of emergency has been declared by the Mayor, Governor and/or President of the United States; any unexpended CDBG funds are subject to being redirected for the immediate response and/or recovery of the declared emergency. Existing contracts are subject to reduction and amending. CDBG funds will be used in a manner that addresses the immediate needs of the community as deemed appropriate by the Director of Housing and Community Development in conjunction with the City Manager. To expedite local response to these events, the public comment period may be reduced to a period of not less than 5 days.

#### **SECTION 8: TECHNICAL ASSISTANCE**

The city shall provide technical assistance to groups representative of persons of low and moderate income that request such assistance in developing proposals for funding assistance under any of the programs covered by the Consolidated Plan. The technical assistance shall consist of the provision of available and relevant information. Technical assistance will be provided for and arranged by the Department of Housing and Community Development (DHCD), Federal Programs Division, 501-A Boush Street, Norfolk, VA 23510.

#### **SECTION 9: COMMENTS AND COMPLAINTS**

The City of Norfolk will consider any comments or views of citizens received in writing, or orally at public hearings, on the preparation of the Consolidated Plan, amendments to the Plan, and performance reports. A summary of all comments or views, as well as how they were addressed in the relevant document (or, if applicable, why they could not be accommodated), will be included in the final Consolidated Plan, amendments to the Plan, or performance reports.

With regard to citizen complaints, the city will make every reasonable effort to issue a written response to every written complaint or grievance within 15 working days of receipt. When this is not possible, the city shall, within 15 working days of receipt of a complaint, issue a letter indicating the status of the complaint review and the approximate anticipated date of a complete response.

#### **SECTION 10: RECORD AVAILABILITY AND ACCESSIBILITY TO THE PUBLIC**

##### Availability of Records

The adopted fair housing plans, Consolidated Plans, Annual Action Plans, Substantial Amendments, and Performance Reports will be made available to the public, and upon request, in a form accessible to persons with disabilities and in a language, which can be understood by non-English speaking persons, when requested.

In accordance with 24 CFR 91.105(h), the city will provide residents of the community, public agencies, and other interested parties with reasonable and timely access to information and records relating to the jurisdiction's Consolidated Plan and use of assistance under the programs covered by this part during the preceding 5 years.

The translation and/or modification of these documents will occur in as timely a manner as possible.

## **SECTION 11: APPLICABILITY TO SECTION 108 LOANS**

In accordance with the requirements of 24 CFR 570.704(2), the city modifies this citizen participation plan to include Section 108 guaranteed loan funds. This section highlights the applicability and expansion of this citizen participation plan as it relates to the requirements of 24 CFR 570.704(2).

- A. Provide timely notice of local meetings and reasonable access to meetings, information, and records relating to public entity's proposed and actual use of guaranteed loan funds including, but not limited to:
  - a. 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;
  - b. The range of activities that may be undertaken with guaranteed loan funds;
  - c. The estimated amount of guaranteed loan funds (including program income derived therefrom) proposed to be used for activities that will benefit low and moderate income persons;
  - d. The proposed activities likely to result in displacement and the city's plans, consistent with the policies developed under § 570.606 for minimizing displacement of persons as a result of its proposed activities. *(See Section 3 and 4 of this Plan)*
- B. Providing technical assistance to groups representative of persons of low and moderate income that request assistance in developing proposals. *(See Section 8 of this Plan)*
- C. Hold a minimum of two public hearings. *(See Section 5 of this Plan)*
- D. Meet the needs of non-English speaking residents in the case of public hearings where a significant number of non-English speaking residents can be expected to participate. *(See Section 10 of this Plan)*
- E. Respond to citizens' complaints and grievances. *(See Section 9 of this Plan)*
- F. Encourage citizen participation, particularly by low- and moderate-income persons who reside in slum or blighted areas and other areas in which guaranteed loan funds are proposed or used. *(See Section 2 of the Plan)*