



# CITY GRANTS PASS CITIZEN PARTICIPATION PLAN for the CONSOLIDATED PLAN

Adopted



# CDBG

COMMUNITY DEVELOPMENT BLOCK GRANT

**Adopted:**  
**Submitted to HUD:**  
**Approved by HUD:**

## **A. INTRODUCTION**

The Citizen Participation Plan (CPP) has been prepared and implemented pursuant to federal regulations (U. S. Department of Housing and Urban Development (HUD) Regulations 24 CFR Part 91.105) and the City of Grants Pass' desire to encourage and support public participation in the development of the documents related to the consolidated planning process.

The purpose of the CPP is to establish a viable means by which residents of the City of Grants Pass (City), public agencies, and other interested parties can actively participate in the development of documents related to the consolidated planning process including:

- The Consolidated Plan
- The Annual Action Plan
- The Assessment of Fair Housing (AFH) and its revisions
- Amendments to Consolidated Plan or Annual Action Plan(s)
- The Consolidated Annual Performance and Evaluation Report (CAPER)
- Amendments to the CPP

The actions described in the CPP relate to the planning and expenditure of funds provided to the City by the HUD Office of Community Planning and Development. The City receives entitlement funds for its Community Development Block Grant (CDBG) program.

## **B. ENCOURAGEMENT OF CITIZEN PARTICIPATION**

The City of Grants Pass strives to encourage and facilitate the participation of its residents in the development of priorities, strategies, and funding allocations related to the consolidated planning process. The City will emphasize the involvement of low- and moderate-income persons, especially those living in slum and blighted areas, areas designated as a revitalization area, areas where the funds are proposed to be used, and low- and moderate-income neighborhoods where 51% of the residents are at or below 80% of the area median income (AMI).

The City encourages the participation of local and regional institutions, the Continuum of Care, and other organizations (including businesses, developers, nonprofit organizations, philanthropic organizations, and community/faith-based organizations) in the process of developing and implementing the documents related to the consolidated planning process.

Also, the City will encourage participation from broadband internet service providers, organizations engaged in narrowing the digital divide, agencies who manage flood prone areas, public land or water resources, and emergency management agencies.

To encourage citizen participation that emphasizes the involvement of low- and moderate- income residents, the City will continue to work with public housing authorities, neighborhood groups, and other organizations representing the City's low- and moderate-income areas and residents.

The CPP ensures that all parties, including residents, non-profit organizations, and other interested organizations, are afforded adequate opportunity to review and comment on plans, programs, activities, and reports covering the City's federally funded housing and community development programs. This includes minority populations, people with limited English proficiency, and persons with disabilities.

The City may alter some requirements listed in this CPP based on waivers or suspensions provided by HUD, typically in response to disasters or other emergencies. For example, the City may shorten a public comment period of a consolidated planning document to more quickly respond to a disaster or emergency with HUD approval.

## **C. CONSOLIDATED PLANNING ACTIVITIES**

### **1. Consolidated Plan and Annual Action Plan**

Every five years, the City of Grants Pass develops a Consolidated Plan, as required by HUD, detailing how the City plans to invest its resources to meet Grants Pass's ongoing affordable housing, community development, economic development, and public service needs over the next five years. The Consolidated Plan is a strategic plan and is developed using a collaborative community engagement process that results in a shared strategic vision for how resources are allocated to meet needs.

The Annual Action Plan outlines the community's needs, budget priorities, local and federal resources, and proposed activities for the upcoming year. Public hearings and draft documents are necessities in the citizen participation process.

#### **a. Public Hearings**

Public hearings will be held at key stages of the consolidated planning process to obtain public input and response regarding community needs, proposed use of funds, proposed strategies and actions for Affirmatively Furthering Fair Housing (AFFH) consistent with the Fair Housing Act of 1968. The AFFH rule is a provision of the 1968 Fair Housing Act that directs the Department of Housing and Urban Development (HUD) and the agencies it funds to ensure that they do not discriminate in their housing and community development programs. The rule requires that these programs actively work to eliminate the barriers and disparities caused by residential segregation. It also requires HUD grantees to certify that they will affirmatively further fair housing.

Pursuant to HUD regulations, the City will conduct a minimum of two (2) public hearings held at different planning stages within the program year prior to submission of the Consolidated Plan and/or Annual Action Plan to allow for resident participation in the development process. At least one (1) of these hearings will be held during the development of the Consolidated Plan and/or Annual Action Plan, before the proposed plan is published for comment.

In the event of a natural disaster or a declared emergency, HUD may waive hearing regulations to include other hearing formats, i.e. virtual hearings. If virtual hearings are used, real-time responses and accommodation for persons with disabilities and/or with limited English proficiency will be made available to the greatest extent possible. Also, the virtual hearing method will only be used in lieu of in-person hearing if national or local health authorities recommend social distancing and limit public gatherings for public health reasons.

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

#### **b. Draft Plan(s)**

Before the Consolidated Plan and/or Annual Action Plan is adopted by the City Council and submitted to HUD (i.e., mid-August), the City will make the plan(s) available to citizens, public

agencies, and other interested parties for review and will also establish the means to submit comments. Information made accessible to the public will include the amount of grant funds the City expects to receive (including program income), the range of activities to be undertaken, and the anticipated number of low- and moderate-income persons to benefit from funded activities.

The City will publish its Draft Consolidated Plan and/or Annual Action Plan for no less than thirty (30) days so that all affected residents will have sufficient opportunity to review and comment on the draft plan(s). A summary describing the contents and purpose of the Consolidated Plan and/or Annual Action Plan will be published in one or more newspapers of general circulation. The summary will be available in English. Every effort will be made to accommodate other languages.

The notice will detail locations where the entire draft plan(s) will be made available for review. Locations may include:

- Community Development Department – 101 NW A Street, Room 202
- City of Grants Pass's Community Development Department Website [Grants Pass, OR - Official Website | Official Website \(grantspassoregon.gov\)](https://www.grantspassoregon.gov/Grants-Pass-OR-Official-Website-Official-Website-grantspassoregon.gov)
- City of Grants Pass Main Public Library – 200 NW C Street

A reasonable number of free copies will be available at the City of Grants Pass Community Development Department (101 NW A Street, Room 202), upon request.

The City will consider any comments or views of residents of the community received in writing, or orally at the public hearings, in preparing the final Consolidated Plan and/or Annual Action Plan. A summary of these comments or views, and a summary of any comments or views not accepted and the reasons why, shall be attached to the final Consolidated Plan and/or Annual Action Plan.

## **2. Amendments to the Consolidated Plan and Annual Action Plan**

For the purpose of the CPP, amendments to the Consolidated Plan and Annual Action Plan are divided into two categories: Substantial Amendments and Minor Amendments.

### **a. Substantial Amendments**

Occasionally, it may be necessary for the City to process a Substantial Amendment to the Consolidated Plan or an Annual Action Plan to allow for new activities, modification of existing activities, or other program changes.

Substantial Amendments are subject to the citizen participation process and require formal action by the City Council and submission to HUD by the end of the program year. Unless waived, the City announces Substantial Amendments to the public by publishing a public notice in one or more newspapers of general circulation for a period of not less than thirty (30) days in order to provide the opportunity for the public to review and comment on the proposed Substantial Amendments. The notice will be available in English and may also be available in Spanish as feasible. The City will consider all written or oral comments or views received from the public concerning proposed substantial amendments in accordance with 24 CFR 91.105(c)(3). A summary of these comments and views, including comments or views not accepted and the

reason why, shall be attached to the substantial amendment.

When using funds from any program covered by the consolidated plan process, any one of the following criteria shall be used by the City for determining what constitutes a Substantial Amendment to its approved Consolidated Plan and/or Annual Action Plan.

- i. Adding a new activity not previously described in the Consolidated Plan or Annual Action Plan
- ii. Deleting an activity previously described in the Consolidated Plan or Annual Action Plan
- iii. Changing the purpose, scope, location, or beneficiaries of an activity previously described in the Consolidated Plan or Annual Action Plan
- iv. Changing allocation priorities or changing the method of the distribution of funds
- v. The budget for the funded activity is adjusted by more than 25 percent (25%) of the jurisdiction's annual award for that activity for that specific year; since the original funding amounts are estimates, it often requires adjustments for actual costs, and this allows the City more flexibility to accommodate funding changes to projects/activities (e.g. economic changes preclude the usage of the funds for the activity leaving unspent funds)

#### Disaster/Emergency events that may require expedited substantial amendments

It may be necessary to expedite substantial amendments to the Consolidated Plan in the event of a declared disaster or emergency. There are three types of disasters/emergency events that may necessitate an expedited substantial amendment: (1) Man-made disasters; (2) Natural disasters; and (3) Terrorism.

Man-made disasters can include chemical spills, mass rioting, power outages, dam failure, plant explosions, etc. Natural disasters can include earthquakes, tsunamis, hurricanes, tornadoes, wildfires, flooding, and public health issues such as wide-spread diseases like the recent COVID-19 pandemic. Terrorism events include bomb threats, biochemical attacks like the spread of anthrax, or cyber attacks such as hacking, phishing, and virus distribution.

These expedited substantial amendments may include funding new activities and/or the reprogramming of funds including canceling activities to meet needs resulting for a declared disaster or emergency. Therefore, the City may utilize CDBG funds to meet these needs using the guidance of HUD regulations as determined for the disaster or emergency crisis.

With respect to the declared disaster, the City may elect to use CDBG funds to address needs not provided for by the Federal Emergency Management Agency (FEMA) and the Small Business Administration (SBA) or other disaster relief efforts. Funding for disaster relief may not duplicate other efforts undertaken by federal or local sources unless allowed by the federal government.

All eligible CDBG activities, including those to address declared disasters or emergencies, must meet one of three national objectives which are: (1) benefit to low-and moderate-income (LMI) persons; (2) aid in the prevention of slums or blight; and (3) meet a need having a particular

urgency (referred to urgent need).

**b. Minor amendments**

Any change that does not meet the threshold of a Substantial Amendment is a minor amendment. A Minor Amendment represents any total proposed amendment that involves less than twenty-five percent (25%) of that year’s annual award. Minor Amendments require the signature of the City’s Manager, or designated representative, but do not require public notice or City Council approval.

A summary of public comments or views and a summary of any comments or views not accepted and the reasons, therefore, shall be included in the description of the amendments forwarded to HUD and published in either the Action Plan or CAPER report. Each such amendment shall be incorporated into the Consolidated Plan through publishing in the next Action Plan and/or CAPER.

**3. Consolidated Annual Performance Evaluation Report (CAPER)**

The City is required to submit a CAPER for its CDBG program to HUD no later than 90 days from the end of a program year. The CAPER describes how funds were spent and the extent to which these funds were used for activities that benefitted low- and moderate-income people.

To allow the public to comment on the performance report, the City of Grants Pass will publish notice in one or more newspapers of general circulation that its Draft CAPER is available for review. The notice will be available in English and may also be available in Spanish as feasible. The notice will detail locations where the entire Draft CAPER will be made available for review.

Locations will include:

- Community Development Department – 101 NW A Street, Room 202
- City of Grants Pass’s Community Development Department Website [Grants Pass, OR - Official Website | Official Website \(grantspassoregon.gov\)](http://Grants Pass, OR - Official Website | Official Website (grantspassoregon.gov))
- City of Grants Pass Main Public Library – 200 NW C Street

The public will have at least fifteen (15) days to comment on the Draft CAPER. All comments and views received during the comment period will be considered and shall be included in the performance report.

**4. Citizen Participation Plan (CPP)**

When changes to the CPP are necessary, the City will publish notice in one or more newspapers of general circulation that the amended CPP is available to review so that the public will have sufficient opportunity to review and comment on the updates. There will be a thirty (30) day public comment period prior to the adoption of the amended CPP. This reasonable notice, opportunity to comment, and comment period will be followed unless subject to HUD waivers or suspensions.

**D. GENERAL REQUIREMENTS**

**1. Public Hearings and Public Meetings**

During the consolidated planning process, the City may hold both public hearings and public meetings.



The location of the public hearings will be held at City Council Chambers, 101 NW A Street, Grants Pass.

Public hearings and public meetings are held at locations accessible to persons with disabilities, consistent with accessibility and reasonable accommodation requirements. Interpretation for persons with limited English proficiency or persons with hearing impairments will be provided, upon request. The City may also provide interpreters, upon request, if a public hearing is held where a significant number of non-English speaking residents are expected to participate. Additional accommodations may be made upon advance request.

Public hearings shall be held after a minimum of a fourteen (14) day notice in at least one newspaper of general circulation. Notices will be available in English and may also be available in Spanish, as feasible.

Public hearings and public meeting notices are posted on the bulletin board at City Hall, readily accessible to the general public at least three (3) days (72 hours) prior to the meeting date, in accordance to the Oregon Open Meetings Law. Public notices are also available on the city's website [Grants Pass, OR - Official Website | Official Website \(grantspassoregon.gov\)](https://www.grantspassoregon.gov). Hard copies will be available for review at the City's Municipal Building, 101 NW A Street, Room 202 between the hours of 8:00 am and 5:00 pm. Upon request, the city will make the subject documents available in a format accessible to persons with disabilities.

In certain circumstances, including health and safety concerns related to public gatherings, the City may utilize virtual public hearings and meetings to meet HUD requirements.

## **2. Technical Assistance**

The City will provide technical assistance, as requested, to groups representing low- and moderate-income persons that are requesting such assistance to develop proposals for HUD funding through the City's CDBG programs. The nature of the assistance to be provided shall be determined by the City Council and need not include the provision of funds to the groups.

## **3. Access to Records**

The City of Grants Pass will provide the public with reasonable and timely access to information and records relating to documents related to the consolidated planning process, as well as the proposed, actual, and past use of funds covered by the CPP.

The public will be provided reasonable access to information, subject to local, state, and federal public information laws and laws regarding privacy and obligations of confidentiality. Confidential documents will be set apart from public information, and any requestors of this information will be promptly informed. The public will have access to records for at least five years from the publication date of the requested document.

## **4. Availability to the Public**

Copies of documents related to the consolidated planning process, as described below, will be available to the public:

- Adopted Citizen Participation Plan
- Final Consolidated Plans

- Final Annual Action Plans
- Final Substantial Amendments to an Annual Action Plan or Consolidated Plan
- HUD-accepted Assessment of Fair Housing (AFH) and its revisions
- Final Consolidated Annual Performance Reports (CAPER)

Copies of these documents will be available for review at the following locations:

- Community Development Department – 101 NW A Street, Room 202
- City of Grants Pass’s Website – [Community Development Block Grant \(CDBG\) and Consolidated Plan | Grants Pass, OR - Official Website \(grantspassoregon.gov\)](http://Community Development Block Grant (CDBG) and Consolidated Plan | Grants Pass, OR - Official Website (grantspassoregon.gov))

Additional single copies of these documents may be obtained from the Community Development Department at no charge.

## 5. **Anti-Displacement and Relocation Policy**

The City’s consolidated planning activities are designed to eliminate or minimize displacement of residents. Program guidelines and limitations are structured so that permanent displacement is unlikely.

Tenants in occupied rental properties are made aware of their rights with respect to displacement and relocation. Property owners are made aware of their rights and responsibilities. Property owners must assume the financial responsibility for the relocation of their tenants.

If displacement will occur due to any planned actions, the City will comply with the requirements of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended, as described in 49 CFR Part 24. If displacement should occur because the dwelling is deemed uninhabitable, it is the City’s policy to provide advisory service and, if applicable, make relocation payments in accordance with local, state, and federal law. The City’s Displacement and Relocation Policy is attached as Exhibit A.

## E. **CITIZENS’ COMPLAINTS**

Written complaints from the public related to the City’s CPP, Consolidated Plan, Annual Action Plans, Substantial Amendments, CAPERs will receive careful consideration and will be answered in writing, or other effective method of communication, within fifteen (15) business days, where practicable.

Written complaints should be sent to:

**Attn: Community Development Department, CDBG**  
 101 NW A Street, Room 202  
 Grants Pass Oregon 97526

## F. **USE OF THE CITIZEN PARTICIPATION PLAN (CPP)**

By adoption of this resolution, the city agrees to follow its CPP during the implementation of all HUD related and HUD funded activities.



## **G. RESPONSIBILITY FOR CITIZEN PARTICIPATION PLAN (CPP)**

The requirements for citizen participation under this CPP shall not restrict the city's responsibility or authority for the development and implementation of the consolidated plan and/or any HUD related or HUD funded activities.

## **H. AMENDMENT TO THE CITIZEN PARTICIPATION PLAN (CPP)**

The City may from time to time modify the provisions outlined herein through an amendment to this CPP. The city will provide citizens with a reasonable opportunity to comment on any amendments to the CPP.

---

## EXHIBIT A

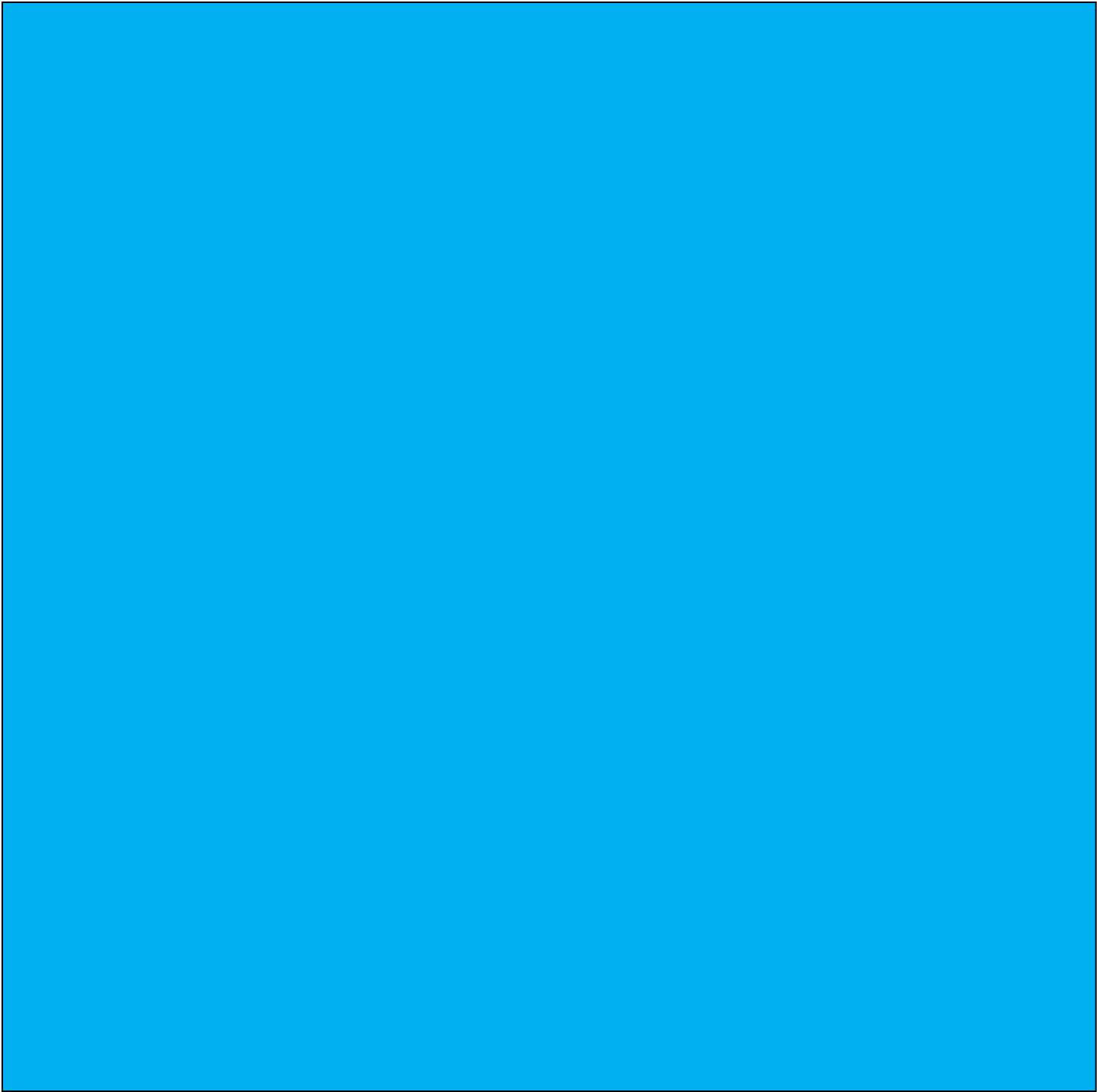
---

### ANTI-DISPLACEMENT AND RELOCATION POLICY FOR THE COMMUNITY DEVELOPMENT BLOCK GRANT PROGRAM

In accordance with the acquisition and relocation requirements of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (the “Act”), as amended, and the implementing regulations of the HUD at 49 CFR 24, and as required under Section 104(d) of the Housing and Community Development Act of 1974, as amended, and Resolution No. 3741 dated and adopted November 6, 1996 by the CITY, the CITY certifies the following provisions are in effect and will be undertaken by the CITY prior to, and in connection with, any activity, assisted with CDBG funds, that will result in the displacement and/or relocation of lower-income City residents.

1. Consistent with the goals and objectives of activities assisted under the Act, the CITY will take the following steps to minimize the direct and/or indirect displacement of persons from their homes:
  - a. Coordinate code compliance activities with its residential rehabilitation and housing assistance programs.
  - b. Evaluate housing codes and rehabilitation standards for lower-income housing to prevent undue financial burden on established owners and tenants.
  - c. Encourage the rehabilitation of lower-income rental units to allow tenants to remain in the building/complex during and after the rehabilitation, working with unoccupied units first.
  - d. Arrange for facilities to house persons who must be relocated temporarily during rehabilitation.
  - e. Identify counseling centers to provide homeowners and tenants with information on assistance available to help them remain in their neighborhood in the face of revitalization pressures.
2. The CITY or designee will replace all occupied and vacant occupiable lower-income (“low/moderate-income”) housing units demolished, or converted to a use other than as lower-/moderate income housing, in connection with a project assisted with CDBG funds.
3. All replacement housing will be provided within three (3) years after the commencement of the demolition or conversion. Before entering into a contract committing the City to provide funds for a project that will directly result in demolition or conversion, the CITY will make public by publication in a newspaper of general circulation and submit to HUD the following in writing:
  - a. A description of the proposed assisted project.

- b. The address, number of bedrooms and location on a map of lower-income housing that will be demolished, or converted to a use other than as lower-/moderate income housing, as a result of an assisted project.
  - c. A time schedule for the commencement and completion of the demolition or conversion.
  - d. To the extent known, the address, number of bedrooms and location on a map of the replacement housing that has been, or will be, provided.
  - e. The source of funding and a time schedule for the provision of the replacement housing.
  - f. The basis for concluding that the replacement housing will remain lower-/moderate income housing for at least ten (10) years from the date of initial occupancy.
4. To the extent that the specific location of the replacement housing will remain lower-/moderate income housing and other data in items (a) through (f) above are not available at the time of the general submission described in paragraph 3 above, the CITY will identify the general location of such housing on a map and complete the disclosure and submission requirements as soon as the specific data is available.



GRANTS PASS OREGON

