2023

City of Alexandria

CITIZEN PARTICIPATION PLAN

FOR HOUSING AND COMMUNITY DEVELOPMENT ACTIVITIES

CITY OF ALEXANDRIA, VIRGINIA
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HOUSING AND COMMUNITY DEVELOPMENT ACTIVITIES

1. Introduction

This Citizen Participation Plan (Participation Plan) has been prepared in accordance with U.S. Department of Housing and Urban Development (HUD) regulations at 24 CFR Part 91 on Community Planning and Development Programs Consolidation published February 6, 1995 and amended February 9, 2006. It updates the Participation Plans approved by City Council in 1995, 2009, and 2021.

The purpose of this Participation Plan is to provide residents of the City of Alexandria, particularly low- to moderate- income persons, with an understanding of their role in the development, implementation, and assessment of housing and community development activities and encourage their participation in the formulation of the Consolidated Plan for Housing and Community Development (Consolidated Plan), the Annual Plan for Housing and Community Development (Annual Plan), any amendments to the Consolidated and/or Annual Plan, and performance reports, such as the Consolidated Annual Performance and Evaluation Report (CAPER).

The Consolidated Plan is a requirement for participation in the Community Development Block Grant (CDBG), Section 108 Loan Guarantee, and Home Investment Partnerships (HOME) Programs, under which the City is an entitlement grantee. In this document, the Section 108 Loan Guarantee Program and funds will be included in any references to the CDBG Program and funds.

The Consolidated Plan is also a requirement for participation in the Emergency Shelter Grant (ESG) and Housing Opportunities for Persons with AIDS (HOPWA) Programs. The City is not an entitlement grantee under the ESG and HOPWA Programs; however, ESG funds are provided through the State, and HOPWA funds are awarded to the entire metropolitan area and distributed to local jurisdictions.

The Consolidated Plan is the City's single planning and application submission to the U.S. Department of Housing and Urban Development (HUD) for participation in these programs. The Consolidated Plan is intended to be a collaborative process whereby the City, with the input of its residents, establishes a unified vision for housing and community development actions.

It is noted that the term “Citizen” is a HUD term with no reference relative to a person’s legal status and applies broadly to all residents of a jurisdiction. The City of Alexandria has requested that HUD review its use of the term and seek more inclusive language.

2. Organizations Involved in or Affected by Housing and Community Development Activities

The City will maintain a list of organizations whose membership or clientele may be affected by the Consolidated Plan and/or CDBG- and HOME Program-funded activities. Each organization will be asked to provide input into the development of the Consolidated Plan and the operation of the City's services and activities funded by the Community Development Block Grant, Home Investment Partnerships, and other housing and community development programs.

The list will include of the following types of organizations:

A. City Boards and Commissions with an interest in housing issues or any of the special populations whose housing needs are addressed in the Consolidated Plan;

B. Homeless shelters and/or service providers;

C. Alexandria-based organizations representing or serving low-to moderate-income persons or persons with special needs throughout the city or expressly concerned with addressing the housing and community development needs of such persons;

D. Regional organizations representing or serving low- to moderate-income persons or persons with special needs throughout the city or expressly concerned with addressing the housing and community development needs of such persons; and

E. Any other organizations with which the City deems necessary or desirable to consult on the Consolidated and/or Annual Plan.

The City will ask that the listed organizations designate a representative to serve as a contact person and provide contact information (email address and phone number). These designated persons will be invited to attend at least one public hearing per year, which will be the staff-level public hearing held prior to the development of the Consolidated Plan and/or Annual Plan. This hearing will include a discussion on past performance and current housing and community development needs. The designated representatives will be provided with electronic copies of the Draft Consolidated Plan (every five years) and Draft Action Plan (annually) via email and notified of the City Council Public Hearing on these draft plans, which will be held in the spring of each year. Hard copies of Plans will be available for public review at the Office of Housing (421 King Street, Suite 215, Alexandria, VA 22314) and City Public Libraries, posted electronically to the City's website at http://www.alexandriava.gov/Housing, and available directly to individuals by postal mail or in accessible format upon request.

The City reserves the right to add new organizations or remove non-participating

organizations (i.e., those that elect not to designate a representative or otherwise elect not to participate) as needed.

Prior to City Council consideration of formal amendments to CDBG and/or HOME Program activities, as well as other not previously mentioned plans and reports requiring public review, the City will disseminate these items to the designated representatives. Material will be provided to the designated representative of each organization in sufficient time to allow comments and input. In addition, designated representatives will be notified of relevant public hearings.

3. Information to be Provided

Prior to the adoption of the Consolidated Plan, the City will make available to the designated representatives of interested organizations (as described above), public agencies, and the public the HUD and Census data it intends to use in the Consolidated Plan. This information will be contained in the draft plan and cross-referenced with the HUD and Census Bureau websites. The draft Consolidated Plan will also include the amount of CDBG and HOME assistance the City anticipates and the projects that may be undertaken. This information will include the estimated amount that will benefit persons of low-to moderate-income. In addition, the City will provide information to the Alexandria Redevelopment and Housing Authority (ARHA) about housing and community development plan activities that will have an impact on public housing communities and surrounding neighborhoods. This information will be made available by ARHA at its annual public hearing conducted as a required part of the Capital Fund Program planning process.

The proposed Consolidated Plan and/or Annual Plan, amendments, and reports will be available in hard copy for public review at the Office of Housing (421 King Street, Suite 215, Alexandria, VA 22314) and City Public Libraries, posted electronically to the City's website at http://www.alexandriava.gov/Housing, and available directly to individuals by postal mail or in accessible or translated formats upon request. A summary of the Consolidated Plan and/or Annual Plan will be distributed to designated representatives of interested organizations as previously described. In accordance with federal requirements, the City will provide the Consolidated Plan and/or Annual Plan at least 30 days prior to the close of the public comment period on the Consolidated Plan and/or Annual Plan, at least 30 days prior to the close of the public comment period on amendments to the Participation Plan, and at least 15 days prior to the close of the public comment period on required reports prior to submission to HUD. Residents will be also notified of the availability of the City's final Consolidated Plan, as adopted, any amendments, and its performance report, to afford residents a reasonable opportunity for review.

4. Public Hearings

The Consolidated Plan regulations include a requirement that the City conduct at least two public hearings per year to obtain residents' views. The hearings must be held at two different stages of the program year and together must address housing and community development needs,

development of proposed activities and review of program performance. One of the two required hearings must be held before the proposed Consolidated Plan and/or Annual Plan is published for comment. The City will meet this requirement by holding one hearing at least 10 days prior to the submission of the CAPER. This hearing will be conducted by staff to allow resident input on the City's prior year performance under the covered HUD programs, as well as housing, homelessness, and community development needs. The second hearing will be held during the public comment period of the Consolidated Plan and/or Annual Plan at a City Council Public Hearing or other designated public body. This hearing will allow for public comment on the draft Consolidated Plan and/or Annual Plan, including the proposed projects for the upcoming grant year, prior to its finalization and submission to HUD.

The City will provide not less than two weeks' notice to the public of the time, location, and subject of all public hearings. Such notices will be published in at least one newspaper of general circulation in Alexandria and distributed to the public via the City's eNews electronic newsletter and announced in abbreviated form using the Office of Housing's social media accounts. A full public hearing notice will be placed in at least one Spanish language news publication which has a circulation that includes the City of Alexandria.

All public hearings will be held at suitable times and in places that are fully accessible to persons with mobility impairments. Virtual or hybrid meetings may also be scheduled to enable public participation. Accommodations for persons with hearing or visual impairments will be made upon request. Whenever the City anticipates that a significant number of non-English speaking residents can reasonably be expected to attend a public hearing, interpretation services will be made available. In emergency or disaster situations (Section 10), public hearings may be held virtually or in hybrid format. The determination of what form of hearing will be held will be made in accordance with the guidance of the City Clerk, the City Attorney, and relevant local ordinances.

5. Access to Records

In addition to posting most materials online, the City will provide residents, public agencies, and other interested parties with reasonable and timely access to information and records relating to the City's use of assistance under the HOME, CDBG and other programs funded by HUD during the preceding five years. To the greatest extent possible, this information will be available for review at the Office of Housing, 421 King Street, Suite 215, during regular office hours (9:00 a.m. to 5:00 p.m., Monday through Friday). If it is not possible for staff to access the building because of emergency circumstances, all digitally available information and records will be provided electronically and access to physical records will be provided as soon as feasible. Requests for difficult to access records, voluminous records or for group inspection of records may require advance scheduling. Residents should call the Office of Housing at 703.746.4990 regarding these types of requests. In some cases, the City may require that such information be requested under the Freedom of Information Act, in which case the Office of Housing will refer residents to the City of Alexandria website or to the City Attorney's Office for further assistance.

6. Technical Assistance

Group representatives of very low- and low- income persons may request technical assistance from the City in developing proposals for funding assistance under any of the programs covered by the Consolidated Plan. The City will, at its discretion, determine whether to provide the technical assistance directly, or to provide funding at a level to be determined by the City. It is important to note that certain regulatory restrictions apply to funding under both the CDBG and HOME Programs.

Requests for technical assistance must be made in writing and should be sent to the attention of the Deputy Director, Office of Housing, 421 King Street, Suite 215, Alexandria, VA 22314, or a future Office of Housing location.

7. Comments and Complaints

The City of Alexandria will consider any comments or views of residents received in writing, or orally at public hearings, during the preparation of the Consolidated Plan and/or Annual 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 and/or Annual Plan, amendments to the Plan, or performance reports.

Regarding resident 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, issue a letter indicating the status of the complaint review and the approximate anticipated date of a complete response.

8. Amendments to the Consolidated Plan

The Consolidated Plan regulations require that the City amend its approved Consolidated Plan whenever it makes one of the following decisions:

A. To make a change in its allocation priorities or a change in the method of distribution of funds;

B. To carry out an activity, using funds from any program covered by the Consolidated Plan regulations (including program income), not previously described in the Annual Plan; and

C. To change the purpose, scope, location, or beneficiaries of an activity.

HUD allows two kinds of plan amendments: minor and substantial. Minor amendments do

not require public participation; however, substantial amendments are subject to a public participation process.

HUD regulations do not define the term "substantial," leaving this definition to the discretion of the City. The City considers a substantial change to include: a change in the targeted beneficiary group of a program or activity; a change in the use of more than 50% of CDBG funds allocated to one eligible activity to another eligible activity; or a change resulting in the reduction of the budget for any activity by more than 50%.

Substantial amendments to the Consolidated Plan will be made public and submitted to HUD for approval prior to the implementation of any changes embodied in the amendment. Residents will be provided with reasonable notice of the changes and an opportunity of not less than 30 days (unless otherwise provided by HUD) to comment on the proposed changes. Copies of amendments to the Plan will be made available to the public at the time they are submitted to HUD. Public hearings will be held during 30-day public comment periods, but the City may elect not to hold such hearings during HUD-authorized shorter comment periods, unless otherwise required by HUD.

9. Adoption of the Participation Plan

The City will provide residents with a reasonable opportunity to comment on any amendments to this Participation Plan. The City will advertise the availability of any amendments as well as the date and time of a public hearing on the matter. Hard copies of the Participation Plan will be made available at the Office of Housing (421 King Street, Suite 215, Alexandria, VA 22314) and City Public Libraries, posted electronically to the City's website at http://www.alexandriava.gov/Housing, and available directly to individuals by postal mail or in accessible format upon request. With reasonable advance notice, the City will make reasonable accommodation for persons with disabilities who require assistance in accessing the report. Translations into other languages will also be available with reasonable advance notice.

10. Emergency or Disaster Situations

In the case of an emergency or disaster, it may be necessary for the City to amend the Consolidated Plan or the Annual Action Plan in an expedited manner. For purposes of this Plan, an "emergency" shall be defined as a State of Emergency as declared by the City, State, or Federal government. A "disaster" shall be defined as the City being included in a State or Federal designated disaster area. Under these circumstances, the public comment and public hearing period requirements of this Plan shall be waived as in accordance with the Waiver Process in Section 11, provided the amendment to the plan redirects the funds to address urgent needs. In the event of a State and/or Federal designated disaster in Alexandria, the City may apply for new CDBG-Disaster Recovery grants. In general, to ensure disaster recovery grants are awarded in a timely manner, provisions of 42 U.S.C. 5304(a)(2) and (3), 42 U.S.C. 12707, 24CFR 570.486, 91.105(b) and (c), and 91.115(b) and (c), with respect to public participation requirements, are waived via Federal

Register Notice.

- HUD criteria used to qualify local "urgent needs" e.g., events of "particular urgency because existing conditions pose a serious and immediate threat to the health or welfare of the community for which other funding is not available" found at 24 CFR 570.483(d);

- Federal Emergency Management Agency criteria used to determine eligibility for assistance after "the emergency or major disaster event" can be found at 44 CFR 206.221-223;

- City actions that could impact Consolidated Plan funds will be consistent with officially adopted emergency management and disaster recovery plans (see https://www.alexandriava.gov/uploadedFiles/fire/info/2016%20City%20of%20Alexandria%20Emergency%20Operations%20Plan.pdf for more detail);

- The City will notify HUD five (5) days before implementing changes or amendments to the Consolidated Plan and/or Action Plan, but is not required to undertake public comment; and

- The City will make reasonable efforts to provide public opportunities for comment about changes using the criteria documented in Section 11 below.

11. Waiver Process

Upon determination of good cause, the U. S. Department of Housing and Urban Development has the authority to waive certain regulatory provisions of the CDBG, HOME, ESG and HOPWA programs subject to statutory limitations.

Examples of good cause for such waivers:

A. Presidential Disaster Declarations under Title IV of the Stafford Act represent one example of good cause for such waivers;

B. The City of Alexandria may seek a waiver to its public participation process, in emergency situations when expedited assistance not available through Consolidated Plan and/or Action Plan covered programs is deemed necessary by the City Manager; and

C. HUD issues notices to waive deadlines for submission and reduction of public comment periods.

Following HUD issuance of waiver notices or approval of a waiver requests, the City reserves the right to amend the Participation Plan comment period as follows:

A. A reduction in the public comment period for Consolidated Plan and/or Action Plan substantial amendments from 30 calendar days to seven calendar days;

B. A reduction in the public comment period from 30 calendar days to seven calendar days in the event of a local "urgent needs" emergency or state/federally declared disaster;

C. Flexibility in determining what constitutes reasonable notice and opportunity to comment; and

D. A removal of the requirement for a public hearing on substantial amendments.

12. Displacement of Residents

The City will make every effort to avoid displacing residents while undertaking the projects or activities funded with HOME or CDBG monies. Residents displaced because of projects or activities affecting only a single residence will be provided with temporary lodging at no cost to themselves and given a daily stipend for the purchase of food in the case of temporary relocations. In the case of permanent relocations, they will be relocated in accordance with the Uniform Relocation Act or the City of Alexandria's Tenant Relocation Policy. If a project or activity affects multiple residential units, residents may be relocated to other residential units on a temporary basis or permanently relocated in accordance with the Uniform Relocation Act or the City of Alexandria's Tenant Relocation Policy. In cases where residents were displaced because of the substantial rehabilitation or redevelopment of their units, they will be relocated to other residential units on a temporary basis and have the right of return to their units or an equivalent unit.

ORGANIZATIONS INVOLVED IN OR AFFECTED BY HOUSING AND COMMUNITY DEVELOPMENT ACTIVITIES

ACT for Alexandria
Affordable Housing Affordability Advisory Committee
African Communities Together
AHC, Inc.
Alexandria Chapter of the NAACP
Alexandria Commission for Women
Alexandria Commission on Aging
Alexandria Commission on Employment
Alexandria Commission on Persons with Disabilities
Alexandria Community Policy and Management Team
Alexandria Community Services Board
Alexandria Community Shelter
Alexandria Council of Human Service Organizations
Alexandria Economic Development Partnership
Alexandria Landlord Tenant Relations Board
Alexandria Redevelopment and Housing Authority
Alexandria Redevelopment and Housing Authority Resident Council
ALIVE!, Inc.
Carpenter's Shelter
Casa Chirilagua
Children, Youth, and Families Collaborative Commission
Christ House
Community Lodgings, Inc.
Economic Opportunities Commission
Friends of Guest House
Habitat for Humanity of Northern Virginia
Housing Alexandria (formerly Alexandria Housing Development Corporation)
Legal Services of Northern Virginia
Northern Virginia Affordable Housing Alliance
Northern Virginia Regional Commission
The Partnership to Prevent & End Homelessness
Rebuilding Together Alexandria – D.C.
Sheltered Homes of Alexandria
Social Services Advisory Board
Tenants and Workers United
Wesley Housing Development Corporation
Others, as determined