COMMUNITY PARTICIPATION PLAN

CITY OF SOMERVILLE
Office of Strategic Planning & Community Development
93 Highland Avenue
Somerville, MA 02143

March 28, 2024

Pursuant to the requirements of 24 CFR 91.105, the City of Somerville hereby issues the following plan to provide for and encourage community participation in the development of the City of Somerville's Consolidated Plan, Annual Action Plan, Assessment of Fair Housing, any substantial amendments to the Consolidated Plan, Annual Action Plan, or Assessment of Fair Housing, and the Performance reports (CAPER).

I. Introduction

The City of Somerville annually receives Community Development Block Grant (CDBG), HOME Investment Partnerships Program (HOME) and Emergency Solutions Grant (ESG) funds from the U.S. Department of Housing and Community Development (HUD), which it administers through the City of Somerville Mayor's Office of Strategic Planning and Community Development. In 1995, the Department of Housing and Urban Development (HUD) combined the CDBG, HOME, and ESG application cycles, creating the Consolidated Plan process. Now this single process is used to evaluate needs, set priorities and allocate funds to implement projects using CDBG, HOME, ESG, and McKinney funds. As a recipient of these entitlement program funds, the City is required to produce the following documents:

1. **Consolidated Plan:** A five-year plan that documents Somerville's housing and community development needs, outlines strategies to address those needs, and identifies proposed program accomplishments.
2. **Annual Action Plan:** An annual plan that describes specific CDBG-, HOME- and ESG funded projects that will be undertaken over the course of the upcoming fiscal year.
3. **Consolidated Annual Performance and Evaluation Report (CAPER):** An annual report that evaluates the use of CDBG, HOME, and ESG funds.
4. **Assessment of Fair Housing (AFH)**: an analysis of local fair housing issues that sets priorities and goals for addressing those issues

In addition to these reports, program recipients must also have in place an approved Community Participation Plan as a requirement of the Cranston-Gonzalez National Affordable Housing Act and Section 508 of the Housing and Community Development Act of 1974, as amended, for direct recipients of HUD programs. This Community Participation Plan has been developed to provide residents, local and regional institutions, and other interested agencies and organizations with opportunities to participate in an advisory role in the planning, implementation and evaluation of the CDBG, HOME and ESG programs which primarily benefit Somerville's low- and moderate-income residents and to review and comment on each of the documents listed above.

II. National Objectives

The primary purpose of these formula grant programs is to assist low to moderate income persons achieve the following goals:

1. Provide decent, safe, and sanitary housing
2. Provide a suitable living environment
3. Expand economic opportunities

Furthermore, under HUD regulations, each activity to be funded must meet one of the above objectives and address one (or more) of the following:

- Serve low or moderate income residents (low or moderate income residents are defined as individuals, families, or households with an annual income less than the Section 8 low income limits. These limits are generally defined as 80 percent of the median area income or less, but greater than 50 percent of the median area income as established by HUD to qualify as low and moderate income individual, families, or households; or equal to 50 percent of the median area income or less as established by HUD to qualify as very low income individuals, families, or households)
- Affirmatively further fair housing by eliminating or reducing slum or blight, improving access to opportunity, expanding housing choice, and allowing for increased mobility.
- Meet an "urgent need" (damage caused by a flood or hurricane, etc.).

III. Administration

The programs are administered by the City of Somerville Mayor's Office of Strategic Planning and Community Development. Throughout each step of the funding process, the OSPCD will be responsible for notifying agencies, organizations and the public regarding funding availability, and assisting the Mayor with funding decisions. Also, the OSPCD will execute agreements with sub-recipients and other City Departments in order to articulate specific program responsibilities including:

- Oversight of the procurement process for design and construction work
- Review and approval of reimbursement requests
- Performance monitoring of sub-recipient performance
- Preparation of plans and reports as required by HUD

IV. Development of the Consolidated Plan

HUD regulations 24 CFR 91.205 to 91.230 requires recipients of CDBG funding to prepare a Five-Year Consolidated Planning Strategy (Consolidated Plan). The Consolidated Plan identifies and prioritizes community development needs, project proposals, and the specific funding needs of programs. The OSPCD will solicit community input for the Consolidated Plan in order to understand and prioritize community needs, and to further explain the consolidated planning process. The consolidated planning process is completed in several stages summarized below:

- Data Collection and Tabulation
- Drafting
- Public Viewing
- Editing
- Submission

A number of methods may be employed to gather input from community members including residents, non-profit organizations and agencies, and members of the business community including: surveys, direct consultation with individual groups, and community outreach programs. The City also conducts public hearings, which encourage the participation of residents, the public housing authority (including residents of the public housing authority as well as management companies and any resident advisory boards or councils if they exist), any other publicly assisted housing developments (including residents of those housing developments as well as management companies and any resident advisory boards or councils if they exist), and assisted living developments, prior to the development of each Annual and Consolidated Action Plan. In an effort to maximize the participation of the low to moderate income community; meetings are held

in a low to moderate income area of the city and are advertised to residents as well as local and regional institutions, agencies, businesses, developers, nonprofit organizations, philanthropic organizations, and community-based and faith-based organizations. In order to maximize participation of non-English speaking residents, translation of all notices, vital documents, and of public hearings will be provided for residents in languages spoken by the five largest Limited English Proficiency (LEP) populations determined by the American Community Survey and/or Decennial Census will be provided. At the public hearings, OSPCD staff review a number of topics including:

- Amount of assistance received from HUD annually (grants & program income);
- Encourage feedback on housing and community development needs;
- The development of activities that may be under-taken using these funds; including the estimated amount that will benefit persons of low- and moderate-income;
- The areas of the city where activities may be undertaken;
- A description of the projects programs and services that are underway using currently available funds; and efforts to minimize displacement.

More information on public hearings is described in Section VII below. In addition to holding public hearings, OSPCD staff will meet with the Continuum of Care and the Somerville Housing Authority to directly discuss the needs assessment of each upcoming Action Plan. The City will also provide an opportunity for residents to review and comment on the contents of a draft of the plan by publishing a summary of the plan in local newspapers of general circulation, making copies of the document available on the City's website and in public locations around the city. More information on public comment procedures is provided in Section X.

V. Development of Assessment of Fair Housing (AFH)

HUD regulations 24 CFR 5.154 requires recipients of CDBG funding to prepare an Assessment of Fair Housing (AFH). The AFH is an analysis of fair housing data, fair housing issues, contributing factors, and an identification of fair housing priorities and goals, which is conducted and submitted using HUD's Assessment Tool. The OSPCD will solicit community input for the AFH in order to understand fair housing issues, prioritize contributing factors needs, and identify strategies and actions to mitigate contributing factors and reduce fair housing issues. The Assessment of Fair Housing process is completed in several stages summarized below:

- Analysis of HUD provided data
- Collection of local data, local knowledge, and local feedback through a community engagement process
- Identification of fair housing issues, prioritization of contributing factors, and setting goals
- Drafting of the AFH using the HUD's Assessment Tool
- Public viewing and commenting
- Editing and responding to public comments
- Submission

The same methods as described in Section IV will be used to gather community member input for the development of the AFH. Additionally, the City shall make HUD-provided data and other supplemental information related to the AFH available to the public at the beginning of the community participation process. The City will do this by providing links to

the data and maps on the City's website, through social media posts, and in direct emails to local and regional institutions, agencies, businesses, developers, nonprofit organizations, philanthropic organizations, and community-based and faith- based organizations. In addition the City shall solicit community input through public hearings and by publishing and making available drafts of the AFH for public comment. More information on procedures for public hearings and public comment is provided below in Sections VII and X, respectively.

VI. Consolidated Annual Performance Evaluation Report (CAPER)

Pursuant with 24 CFR 91.105(a)(2)(i) The City of Somerville will, prior to submitting any Consolidated Annual Evaluation Report (CAPER) to HUD, make available to residents, businesses, public agencies, and other organizations a draft CAPER. A draft will be made available in order to provide for and encourage residents to participate in the development of the Performance report. The OSPCD will provide a reasonable opportunity for these groups to examine and comment on the draft through the following actions:

- The City will publish a legal notice in a local daily newspaper of general circulation such as the Somerville Times or the Somerville Journal, summarizing the contents and purpose of the CAPER and include a list of the locations, such as libraries, city government offices, and other public buildings, where copies of the entire draft may be examined. The notice will also specify the deadline and place to which comments may be submitted. The City will allow for a minimum of a 15 day period for comments to be received.
- A public hearing will be held no later than 15 days prior to submitting the final CAPER report to HUD. The public hearing will follow the same protocol and procedures as those detailed in Section VI.
- A draft of the CAPER report will be posted on the City website in a format that is available for residents to examine and download. The opportunity to return comments will be made available by email at ospcd@somervillema.gov.
- A reasonable number of free copies of the CAPER will available to residents and groups that request it.

VII. Section 108 Loan

In accordance with Section 108 of the Housing and Community Development Act of 1974, as amended (the "Act"), and with 24 CFR Part 570.704 (b) the City of Somerville certifies that before applying for a Section 108 loan, it made efforts to secure financing for activities described in the application without the use of the loan guarantee and cannot complete such financing consistent with the timely execution of the program plans without such guarantee. Prior to submitting a loan application to HUD, the City will make available to residents, businesses, public agencies, and other organizations a draft application. The OSPCD will provide a reasonable opportunity for these groups to examine and comment on the application by:

- Holding a minimum of two public hearings each at a different stage of the application process.
- Including information regarding the amount of guaranteed loan fund expected to be made available in the coming year, the range of activities that may be undertaken with the funds, the estimated amount of loan funds proposed to benefit low- and moderate-income persons, and any proposed activities that may result in the displacement of persons and the plans to minimize the displacement.

- Including the needs and input of non-English speakers, LMI persons, persons who reside in slum/blight areas, and areas where the funds are proposed to be used.
- Responding to citizen comments within 15 days of receipt.

VIII. Public Hearing Process

1. Frequency. The City will hold a minimum of two public hearings annually, at different times during the Consolidated Plan process to obtain resident input, respond to proposals and questions on proposed programs and projects, address housing and community development needs, discuss strategies to affirmatively further fair housing, and review program performance. These meetings will coincide with development of the Consolidated Action Plan, Annual Action Plan, CAPER Performance report, and AFH report. A minimum of one public hearing will be held for the development of the Consolidated/Annual Action plan, the Annual Performance report (CAPER), and the Assessment of Fair Housing (AFH). For the Consolidated Plan and Assessment of Fair Housing, this meeting will be held before the draft plan/assessment is published for public comment.

    - It is anticipated that the draft Consolidated Plan or Action Plan will be issued on or about the second week of April of each year and the plans shall be adopted and submitted to HUD no later than the 15th of May of each year.
    - It is anticipated that the draft Performance Report (CAPER) will be issued on or before the 15th of September of each year and the report shall be submitted to HUD no later than the 30th of September of each year.
    - It is anticipated that for the first submission of the Assessment of Fair Housing (AFH), the draft Assessment of Fair Housing (AFH) will be issued on or before the 15th of August, 2017. For subsequent Assessment of Fair Housing (AFH) submissions, which are due 195 calendar days before the start of the 5-year Consolidated Plan period, draft Assessments of Fair Housing (AFH) will be issued on or before the 1st of November of the year prior to when the next 5-year Consolidated Planning period begins in order to allow for public comment.
    - It is anticipated that the intent to apply for any Section 108 funding will trigger a minimum of two public hearings following the timing and format noted in the Section 108 requirements (Section VII) stated above.

2. Location. Hearings will be held in areas of the city where CDBG funds are proposed to be used, specifically in neighborhoods of predominantly low- and moderate-income residents as defined by the most recent U.S. Census data. The meetings will be held on a weekday evening and the location will be handicap accessible.

3. Outreach. Notification of Public Hearings will be given in accordance with HUD regulations and the Massachusetts Open Meeting Law, Chapter 30A: Section 11A/2. Public meeting notices with information about the hearing will be published in English, Portuguese, Haitian Creole and Spanish two weeks prior to the date of the hearing in general circulation publications within the city.

    - Translations of the public meeting notice in Haitian Creole, and Portuguese, in addition to English and Spanish, will be published on the City's cable wheel.
    - Meeting notices will be posted in English, Spanish, Haitian Creole, and Portuguese on the City's website.

- Special Accommodations – In order to encourage participation among minority groups, non-English speaking persons, and persons with disabilities; the City of Somerville will, with a minimum of ten (10) days advance notice to the OSPCD by phone, mail, or e-mail , arrange for an interpreter, a sign interpreter, services for the visually impaired or other special accommodations for persons with disabilities (e.g. providing Braille, oral, electronic, or large print copies).
- Surveys may be distributed to community members to collect additional input.
- Outreach to the LMI Community - Public Notices will be sent to each of the CDBG funded public service providers and to participating organizations based in the Neighborhood Revitalization Areas for posting in public areas.
- Fliers of the meeting will be posted and distributed in the following locations throughout the city:

  - Mailing to all public service agencies with a request that the fliers be translated, if possible, into languages other than Spanish, Portuguese, Haitian Creole or English, if this is appropriate for their constituency.
  - All branches of the Public Library
  - Front hall of City Hall
  - The Mayor's office
  - OSPCD front desk
  - Other locations as deemed appropriate

4. Accessibility. All hearing/meeting locations will be handicapped accessible. Meetings will be advertised in English, Spanish, Portuguese and Haitian Creole (and other languages as necessary with advance notice). All ads, notices and flyers will include a TTY phone number and contact information to arrange for special accessibility requirements. The City's SomerViva interpreters will be present at all public hearings to provide translation services to any non-English speaking residents. Persons with disabilities who need auxiliary aids and services for effective communication, written materials in alternative formats, or reasonable modifications in policies and procedures in order to access the programs and activities of the City of Somerville, are invited to make their needs known to the ADA coordinator:

   ADA Coordinator
   Executive Office on Disability and Compliance
   167 Holland Street, Second Floor, Room 207
   Somerville, MA 02144
   617-625-6600 X2323
   866-808-4851 (TTY)

5. Information Provided. At the first public hearing after the City receives information on the amount of assistance it expects to receive from HUD (including grant funds and program income), the City will provide this information to the public. Generally, at each hearing the following information is to be provided:

   - Amount of assistance received from HUD annually (grants & program income);
   - The development of activities that may be under-taken using these funds, including the estimated amount that will benefit persons of low to moderate income;

- Strategies and actions aimed at affirmatively furthering fair housing consistent with the Assessment of Fair Housing (AFH);
- The areas of the city where activities may be under-taken;
- A description of the projects programs and services that are underway using currently available funds; and efforts to minimize displacement;
- Review of program performance;
- Copies of the most recently published consolidated plan; performance report; and other relevant documents (Neighborhood Revitalization Strategy Area plans etc.) will be made available free of charge to any local resident, agency, or organization.

IX. Notification to Public Housing Authority

The City will provide information on a regular basis to the Somerville Housing Authority about Consolidated Plan activities related to its developments and surrounding communities so that the Housing Authority can:

- Have this information available for the annual public hearing required under the Comprehensive Grant program.
- Encourage participation among residents in the process of developing and implementing the consolidated plan.

X. Amendment Policy

The following criteria will require that the City enact its outlined community participation plan in order to solicit and obtain feedback from the low and moderate income community, in accordance with 24 CFR 91.105:

- To make a change in its allocation priorities or a change in the method of distribution of funds from one eligible activity to another.
- 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.
- To change the purpose, scope, location, or beneficiaries of an activity.

Any of these factors will be considered a substantial amendment and will be required to go through a formal amendment process. Notwithstanding the foregoing, minor budgetary revisions to the Consolidated Plan, which are defined as changes that do not exceed 25 percent of the original budget amount, will not constitute a substantial amendment and will be made without a public hearing or notification.

The City shall revise an accepted Assessment of Fair Housing (AFH) and submit the revised AFH for review by HUD under the following circumstances:

- 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. This may include natural disasters; 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;
- HUD notifies the City that a material change has occurred that requires a revision.

In such instances, the City of Somerville shall hold a public hearing on such an amendment to the Consolidated Plan or revision to the Assessment of Fair Housing. The public hearing will follow all the protocol and procedures detailed in Section VI. The notice will summarize the nature of the proposed amendment, the date, time and location of the public hearing, and procedures for submission of comments. The City may make this notification by publishing a notice in the newspaper of general circulation along with notification sent to agencies or organizations affected by the amendment. The notice will also be posted on the City's website. The City shall provide a period of at least 30 calendar days for comment on amendments to the Consolidated Plan and/or revisions to the Assessment of Fair Housing (AFH). The City shall consider any comments received in writing or orally at the public hearing. The City of Somerville will determine whether to adopt the proposed amendment/revision, adopt a revised version of the amendment/ revision, or reject the amendment/revision. The determination will be posted on the City's website. If the amendment/revision is adopted, the change will be incorporated into the Consolidated Plan and/or Assessment of Fair Housing (AFH), along with a summary of comments on the amendment and the City's response to such comments. The amended Consolidated Plan or revised Assessment of Fair Housing along with the summary of comments and responses shall then be submitted to HUD for review.

XI.Resident Comment on the Consolidated Plan / Amendments, Assessments of Fair Housing/Revisions, Performance Reports, and proposed Section 108 borrowings.

1. Notification. In accordance with to 24 CFR 91.105(a)(3), the City will publish notification of the availability of the proposed Consolidated Plan, Consolidated Annual Performance Evaluation Report (CAPER), and any substantial amendments in a newspaper of general circulation and on the City website giving residents not less than 30 days for the Consolidated Plan and substantial amendments and not less than 15 days for the Performance Report (CAPER) to comment. This notice will include:

    - The date on which the plan will be available and the date by which comments must be received;
    - The name of the person and/or agency where comments should be directed (Comments should be directed to the Office of Strategic Planning and Community Development);
    - The form that comments should take (written, email, fax etc.).

2. Location. The City will make the plan available at the following location for a period of not less than 30 days for the Consolidate Plan and substantial amendments (15 days for the CAPER) so that residents may comment on the plan:

    - All branches of the public library;
    - Office of Strategic Planning and Community Development;
    - By email or parcel post as requested;
    - On the City website at www.somervillema.gov. Persons who are visually impaired may contact OSPCD to arrange for special accommodations; and,
    - In addition to the documents being available online or at one of the sites listed above, local residents may also request a copy from the Office of Strategic Planning and Community Development. Copies will be made available to the public free of charge.

3. Technical Assistance. The City will provide for technical assistance to groups representative of person of low-to-moderate income that request such assistance to comment on the Consolidated Plan and/or Assessment of Fair Housing (AFH).
4. Consideration of Comments. All comments or views of residents received in writing, or orally at the public hearings will be considered in preparing the final consolidated plan.

XII.Availability to Access Public Records

The City of Somerville will publish the entire final Consolidated Plan, related amendments, and Performance report (CAPER). The City of Somerville will also publish and make available the entire Community Participation Plan. These documents will be made available to the public at the following locations and by the following means:

- All branches of the public library;
- Office of Strategic Planning and Community Development;
- By email or parcel post as requested; and,
- On the City website at http://www.somervillema.gov.
- A reasonable number of copies will be made available free of charge.
- These documents will also made available in a format accessible to persons with disabilities upon request (e.g. providing oral, Braille, electronic, or large-print copies for the visually impaired and delivering copies to the homeward bound).

XIII.Technical Assistance

The City and OSPCD Staff will be available during business hours to answer questions and provide technical assistance to residents, public agencies and other interested parties in developing proposals for funding under any of the programs covered by the Consolidated Plan. CDBG applicants will be encouraged to contact the OSPCD staff prior to the submission of application materials to ensure that the proposal meets program eligibility requirements.

XIV. Resident Complaint Process

The OSPCD will be responsible for responding to complaints from residents regarding the Consolidated Plan, any related amendments, the Performance report (CAPER), the Assessment of Fair Housing (AFH), any amendments or revisions to the plans, and the community participation plan. Complaints may be submitted in writing to the OSPCD by mail, or in-person. When submitting a complaint, residents shall provide a description of the specific activity and/or project, information on the organization responsible for carrying out the activity and/or project, and a statement of the grievance. Complaints must be mailed or hand delivered to:

City Hall
City of Somerville, Massachusetts
Mayor's Office of Strategic Planning and Community Development
93 Highland Avenue
Somerville, MA 02143

The OSPCD will review complaints and provide a written response within 15 business days.