

Citizen Participation Plan

91.200(b)

The Citizen Participation Plan for the City is designed to ensure citizen involvement in the planning and reporting on the City's programs covered under the HUD Consolidated Plan requirements. The purpose of the Citizen Participation Plan is to ensure that citizens, nonprofit organizations, and other interested parties are afforded adequate opportunity to review and comment on plans, programs, activities and reports regarding the City's federally funded housing and community development programs.

Citizen Participation Plan Objectives

The primary objectives of the City's Consolidated and Citizen Participation Plans are to:

- Encourage citizen participation in the development of the Consolidated Plan and the Comprehensive Annual Performance and Evaluation Report (CAPER) with emphasis on participation from individuals and households identified as low to moderate income, residents of blighted areas, minorities, those with limited English proficiency, the disabled, and those residing in areas where funding will be utilized.
- Provide citizens with reasonable and timely access to meetings, information and records relating to the City's plan for utilizing funding in addition to allowing reasonable opportunity to comment on the Consolidated Plan, the Citizen Participation Plan and the CAPER.
- Finalize consultation with the Housing Authority of Billings on the development and implementation of the Consolidated Plan through the Annual Action Plan, which includes input from residents of public and assisted housing.
- Provide technical assistance to neighborhood task forces which represent the low to moderate income and the highest concentrations of minority populations in Billings.
- Provide public hearings to obtain citizen views and to respond to proposals and questions at all stages of the community development program. All hearings and meetings shall be provided in areas where accommodations for the disabled can be provided.

Community Development Board

The Community Development Board is a citizen's advisory board consisting of nine members who are appointed by the Mayor of Billings with the consent of the City Council. Six members are appointed from lower-income neighborhoods of the City as defined by federal regulations for the Community Development Block Grant (CDBG) program and three members represent the community at large. This board serves in an advisory capacity to the City Council for the purpose of providing citizen input on policy decisions to the City Council. The primary responsibilities of the board are to review existing and proposed City policies and to review the Community Development Division's activities to ensure policies are being implemented and carried out.

The Community Development Board makes recommendations to the City Council regarding the Consolidated Plan, the Annual Action Plan, the Citizen Participation Plan, and the Comprehensive Annual Performance and Evaluation Report (CAPER). In addition, the Community Development Board reviews applications submitted for CDBG and HOME funding in order to make funding recommendations to the City Council for approval.

Billings City Council

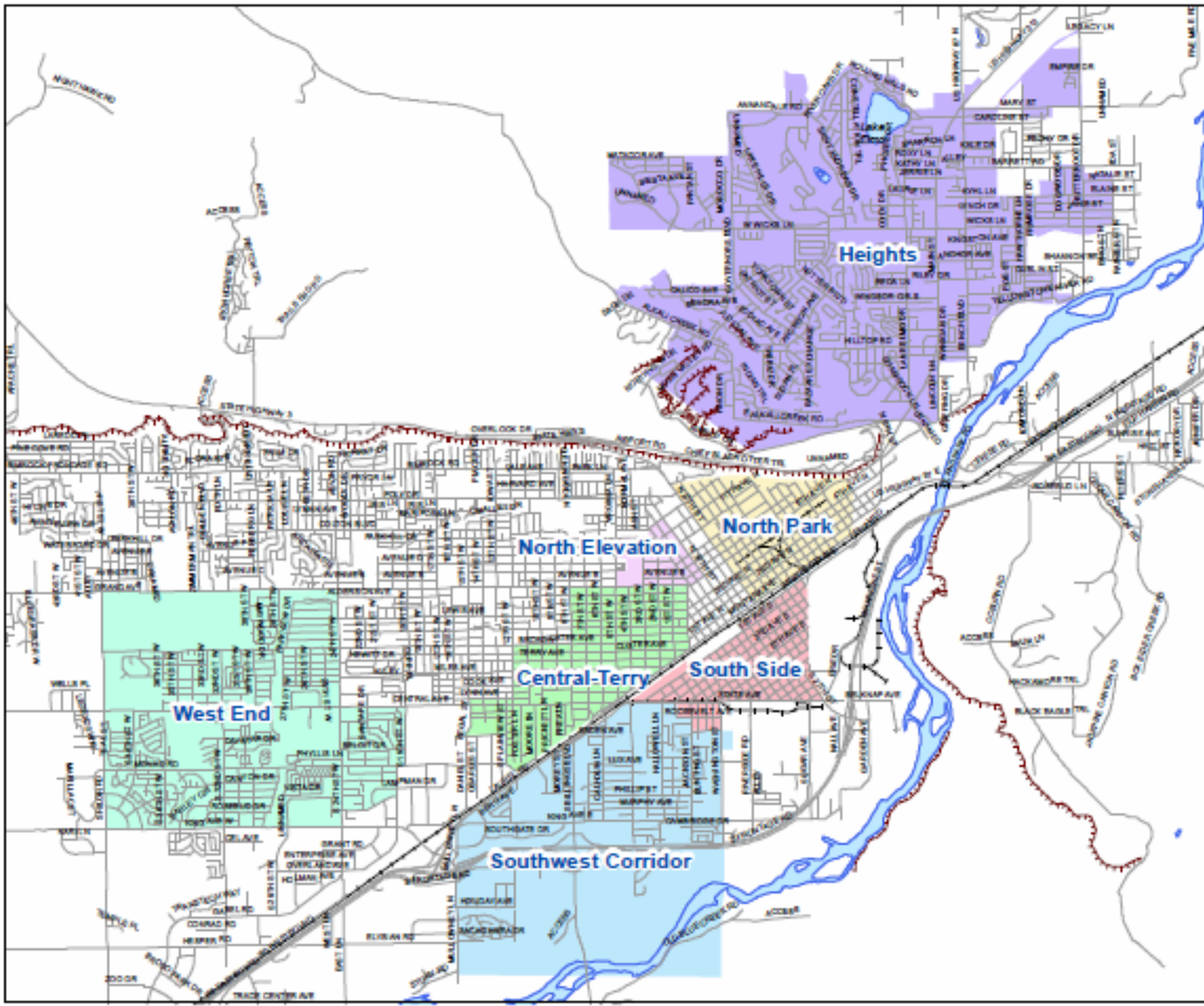
The Billings City Council is the final citizen policy body that reviews and takes action on the Annual Action Plan, including the Citizen Participation Plan. The Community Development Board presents recommendations to the City Council during a scheduled work session preceding the public hearing in April in order to deliver information on decisions made regarding recommendations. After receipt and consideration of public comments, the City Council approves the Annual Action Plan and proposed funding allocations. Following approval in May, the Annual Action Plan is forwarded to HUD.

Neighborhood Task Forces Representing Low / Moderate Income Households

In order to encourage citizen participation emphasizing the involvement of lower-income residents in areas where housing and community development funds may be spent, the City will continue to work with neighborhood organizations representing the City's lower-income areas. These areas are predominantly illustrated as established Task Force areas in Billings. A map of the City's lower-income areas is located on the following page.

The City will continue to work with neighborhood task forces that represent the community's lower-income areas to ensure input from these areas in the development and implementation of the City's community development strategies as described in the Consolidated Plan. The City will also continue to support the activities for the Adjacent Neighborhood Committee, which is comprised of Task Force Officers who meet bi-monthly to collaborate and exchange information regarding the task force areas. The Community Development Division supports task force functions through the distribution of monthly newsletters to over 1,400 recipients, by facilitating the Adjacent Neighborhood Committee, and by requesting project rankings from task force participants on housing and neighborhood activities for the annual allocation process.

The Community Development Division staff attends meetings of lower-income task force neighborhoods when requested for specific presentations. Staff also provides information regarding housing and community development programs and activities during each allocation process and garners rankings of housing / neighborhood activities preferred for funding.



Participation through Partnerships

The Community Development Division's vision is to act as a catalyst for joining community partners with resources to increase access to housing, to create a sustainable community and to promote neighborhood revitalization. The Division's mission focuses on striving to exceed the expectations of our stakeholders by supporting housing and community partners with quality leadership, accountability, and innovative programs and services. Guiding values and principles include:

- Embracing diversity and being respectful of all viewpoints.
- Utilizing creativity to develop best practices in programs, administration, and community service.
- Recognizing that our first responsibility is to low and moderate income individuals who would most benefit from programs.
- Showing integrity as public servants to thoughtfully manage and pursue resources to the benefit of the community.

Establishing and maintaining partnerships with myriad organizations that support the community vision is the keystone to the Division's planning efforts. In addition to neighborhood task forces and the Adjacent Neighborhood Committee, the Community Development Division supports the following organizations and includes their input throughout the year:

- ***Affordable Housing Task Force*** – The Affordable Housing Task Force is comprised of lenders, realtors, the Housing Authority of Billings, local housing developers, and other organizations working in housing to ensure coordination and collaboration in identifying needs, undertaking actions to meet those needs, and evaluating activity effectiveness. The vision of the group is to successfully identify the housing needs of the community and provide expertise and innovative solutions to ensure attainable housing for all. Their mission is to work as a positive voice coordinating action, and organizing and energizing efforts to promote affordable housing in the Billings area.
- ***Billings Partners for American Indian Homeownership*** – The Billings Partners for American Indian Homeownership (BPAIH) was formed in order to provide an organized approach to outreach and education for American Indians who would like to purchase a home. This group has identified a 26% American Indian homeownership rate compared to 67% for whites and 45% for blacks and Hispanics. Their vision is to increase American Indian private homeownership in the greater Billings community. This organization is comprised of lenders, realtors, housing organizations, credit counseling organizations, Indian Health Service, Yellowstone County Extension Office, and others.
- ***Mayor's Committee on Homelessness*** - The Mayor's Committee began meeting in June 2006 following Mayor Tussing's charge to develop a 10-Year Plan to address the needs of the chronically homeless in Billings. The development of this plan was part of a national movement to change the way in which communities address homelessness and was the first of its kind in Montana. To date, over 300 cities across the nation have committed to implementing 10-Year Plans to impact chronic homelessness. The Mayor's Committee includes representation from a broad stakeholder group including housing / service providers, civic / business leaders, economic / work force agencies, faith based / philanthropy groups, and other interested parties.
- ***Fair Housing Organizations*** – The City actively partners with organizations with an interest in fair housing and has facilitated several grant applications for the Fair Housing Initiative Program

(FHIP) available competitively through HUD. The City was awarded this grant in 2006 for over \$93,000. In 2007 and 2008 grant awards were made for over \$99,000 for each year. Previous partners and sub-recipients of FHIP funding include: homeWORD, the Community Housing Resource Board, Interfaith Hospitality Network, the Billings Partners for American Indian Homeownership and Yellowstone County Council on Aging in Billings.

Racial / Minority Participation

The City's most concentrated minority populations are located in the Southside, Southwest Corridor, North Park, North Elevation, and Central – Terry Park Task Force neighborhoods. Outreach efforts include ongoing communication through task force newsletters, the Adjacent Neighborhood Committee, the Billings Partners for American Indian Homeownership, the Mayor's Committee on Homelessness, and the Billings Area Resource Network. Further details are located in Section Five - Geographic Data.

Persons with Disabilities & Reasonable Accommodation

The City will provide accommodations for individuals with disabilities in public meetings, public hearings and in written documentation regarding programs and services available from the Division. Statements are included in notices of public hearings and service brochures indicating that office and hearing locations are accessible to persons with disabilities. Accommodations can be made for other disabilities as well.

Limited English Proficiency Plan & Language Assistance Plan

The City complies with federal regulations regarding the provision of a Limited English Proficiency Plan and Language Assistance Plan in order to adequately provide for the needs of those individuals who have self-identified a primary language which is not English. Statements are included in notices of public hearings and service brochures regarding the availability of language interpretation for those requiring this accommodation.

Technical Assistance

The Community Development Division provides technical assistance as requested and as staff time allows to lower income groups to develop proposals for housing and community development activities in the City limits. The technical assistance is offered any time proposals for the use of funding are requested, and is offered routinely in January prior to application deadlines for CDBG / HOME funding allocations.

Public Involvement & Consolidated Plan Review

Citizen participation is the foundation of housing and community development programs. Reasonable efforts are made to make all citizens aware of public hearing and citywide events concerning the development of the Annual Action Plan.

City Council agendas covering housing and community development programs are made available to the public as required by Montana State Law. The City follows State Law governing advertising of public

hearings required for CDBG and HOME activities. The City is required to advertise the public hearing on two consecutive Thursdays prior to the City Council Meeting on Monday or Tuesday in the event of a holiday.

Plans and reports on the City's housing and community development activities are made available for review by citizens, public agencies, and other interested parties. These documents are available at the Community Development Division and posted on its website at www.ci.billings.mt.us. All records regarding these activities are maintained according to the City Record Retention Schedule and as required by federal regulations.

Public Hearings

The City holds three public hearings each year regarding housing and community development activities. The first public hearings are held each March by the Community Development Board to gather public input on the community and housing needs of Billings and strategies to meet those needs through Budget Hearings. The second public hearing is held by the City Council in April to provide nonprofit agencies, organizations, and individuals with an opportunity to provide input on the Consolidated Plan and the allocation of CDBG and HOME funds in the community. The third public hearing is held by the City Council in September to gather public input on the City's performance and progress in meeting the strategies included in the City's Five-Year Consolidated Plan and Annual Action Plan for the previous fiscal year ending each June 30th. All public hearings are accessible to disabled individuals, publicized as required by State law and allow for accommodation of individuals with hearing, visual, or mobility impairments.

Report & Plan Availability

The availability of the reports and plans required under the Consolidated Plan is published in the local newspaper with complete copies available on the internet at www.ci.billings.mt.us and at the City's Community Development Division. The public notice describes the contents and purpose of each document including the location at which the complete plan can be examined. Subrecipients, housing partners, and neighborhood task force chairpersons are contacted regarding the availability of the information described above.

A summary of the plan development process and public comments received during this process will be included in final version of the Consolidated Plan, Annual Action Plans, and Comprehensive Annual Performance and Evaluation Report submitted to the U.S. Department of Housing and Urban Development. The Community Development Division office is located at the Parmly Billings Library, 4th Floor, 510 North Broadway, Billings, Montana 59101 and has office hours Monday through Friday, 8:00am to 5:00pm.

Public Comments

Public comments are requested at least 30 days prior to submission of reports required under HUD's Consolidated Plan process. The City will consider all written comments by citizens, public agencies and other interested parties prior to submission of its final Consolidated Plan and related reports to HUD and attach a summary of each comment to the final submission. If written comments are not accepted for

inclusion in the Plan, the City will provide written explanation of why those comments were not accepted.

The City will provide written responses to all written complaints and grievances related to the Consolidated Plan requirement and the City's housing and community development programs within 15 working days of receipt of the complaint or grievance where practical.

For the purposes of reviewing the specific five-year Consolidated Plan, public hearings were held on the following dates:

- March 18, 2010 - 9:00am - 2:00pm (advertised March 4 & 11, 2010)
- March 19, 2010 - 9:00am - 2:00pm (advertised March 4 & 11, 2010)
- April 26, 2010 - 6:30pm (advertised March 25, 2010 and April 8, 2010)

The public comment period was held from March 26, 2010 through April 26, 2010, and the Consolidated Plan was available online at www.ci.billings.mt.us.

Public comments submitted for the Consolidated Plan include the following:

- **Jim Hartung:** Said he was the vice chair of the Community Development Board and was available to answer any questions. Councilmember Gaghen said she had served on the Community Development Board years ago and was well aware of the amount of time and effort that went into the whole process. She thanked Mr. Hartung for the Board's commitment.
- **Paul Chinberg:** Said he was the Executive Director of Family Service, Inc. and was present to encourage Council's approval. He said Family Service, Inc. had seen a 25% increase in people asking for assistance; many who were just on the verge of homelessness; and their program was intended to prevent homelessness. He said the additional funding would help them provide for their neighbors in need.
- **Adela Awner:** Said she was the Executive Director of Interfaith Hospitality Network, whose mission was to help homeless families achieve and sustain independence. She said she would like to thank the Community Development Board for their work. She said they, too, had seen a significant increase in people coming to them seeking help. Ms. Awner said those who come into their program are having a much more difficult time finding jobs. She said they required their families to find work and save their money for the first month's rent and deposit, but because of the job situation, that was taking much longer to achieve. She said the funding would help the families with their first month's rent and deposit and utility deposits, so they could move families out faster and take in new families. Ms. Awner encouraged council's approval.
- **Mary Lou Affleck:** Said she was the Vice President of Rebuilding Together Yellowstone County. She said they were a volunteer organization preserving affordable housing. Ms. Affleck thanked the Community Development staff and asked for Council's approval.
- **Darrell LaMere:** Said he was a housing services specialist with homeWORD. Mr. LaMere said last year they had served 243 families in Billings with First Time Homebuyer applications and presented a copy of statistics for the record. Mr. LaMere asked for Council's approval. Councilmember Ronquillo asked Mr. LaMere if they continued to meet at Southern Lights and complimented Mr. LaMere on the good job they were doing. Mr. LaMere said they still held their classes at Southern Lights located at 801 South 28th Street.

- **Ernan Cortes:** Said he was the Executive Director of the Community Housing Resource Board. He said the Board asked Council to approve the recommendation regarding the disbursement of funds. He thanked Ms. Beckett for being their liaison. He said the Community Housing Resource Board was founded in 1992 and played an integral part in providing fair housing. Mr. Cortes also thanked Council for proclaiming April as Fair Housing Month. He said the Community Housing Resource Board was reaching out to all active partners and nonprofits to hopefully consolidate and leverage their ability to seek out funds, and it was his goal to reach out to everyone, including the Human Relations Commission and others, so the Community Housing Resource Board could provide and share the funding that the Community Development Board granted them to those who did not have funding.

Criteria for Amending the Consolidated Plan

24 CFR part 91.105(c) of the Final Rule requires grantees of CDBG and HOME programs make public the criteria the City will use for determining what changes in planned or actual activities constitute a substantial amendment to the Five-Year Consolidated Plan. An amendment to the approved plan will occur when the City of Billings decides:

- Not to carry out a project or activity described in the plan.
- To carry out a project not previously described.
- Substantially change the purpose or scope of a project.

Prior to the submission of any substantial change in the proposed use of federal housing and community development funds, the City of Billings will hold a public hearing to allow citizens reasonable notice of, and opportunity to comment on, proposed amendments. Public comment periods will not be less than thirty (30) days.

Substantial changes are defined as the creation of any new budget line item to be funded under the City's HOME and CDBG programs, or a budget amendment resulting in an increase or decrease in a previously approved line item of more than \$25,000.