



City of Bellingham

Consolidated Plan and Assessment of Fair Housing

Community Participation Plan

The City of Bellingham updates its Consolidated Plan and Fair Housing Assessment every five years as required by the U.S. Department of Housing and Urban Development (HUD) and the Code of Federal Regulations (CFR). The Consolidated Plan provides a 5-year roadmap for Bellingham's community development and housing needs, with implementation reflected in Annual Action Plans and Annual Performance Reports. CFR 24 § 91.105 requires local governments to develop a Community (or Citizen) Participation Plan (Plan). This Plan addresses how the City will meet the requirements for early and continuous public engagement.

Why does this Process Matter?

Everyone in Bellingham is impacted by issues related to housing and poverty. Whether you yourself struggle to find affordable housing, know someone who has faced discrimination in housing, or witness the effects of unstable or no housing for those who have little means and/or are disabled, we all know these issues shape our community. The Consolidated Plan impacts actions the City takes over a 5-year period. It impacts goals, priorities, strategies, and funding allocations. It helps shape local funding priorities, including the housing levy. It helps prevent geographic disparities within the City. We invite community members to help us create a future that addresses the real needs and issues by providing your own input and helping the City to 'truth test' the data we rely on as the backbone of our plans. Even when we are not actively in the process of updating the plans, we appreciate hearing community input and value the voices of community members.

What is the Assessment of Fair Housing?

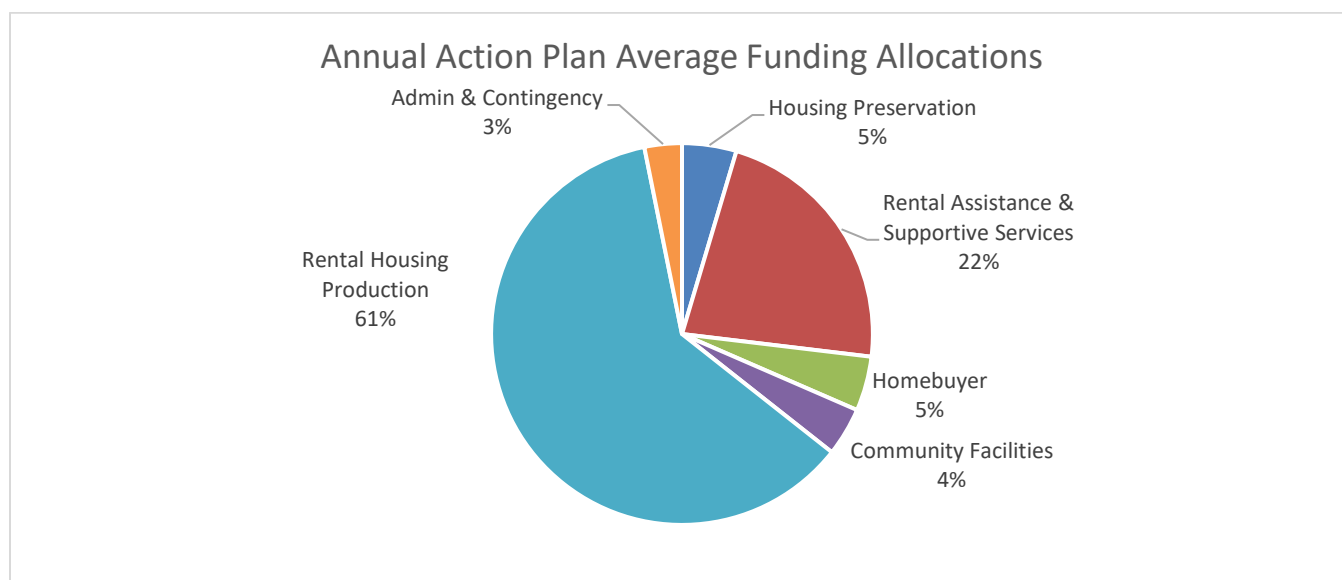
The federal Fair Housing Act (FHA) and its amendments protect people from negative housing actions that occur because of their race, color, national origin, religion, sex, disability, or family status. State fair housing laws cover additional groups: marital status, sexual orientation or gender identity, age, and military/veteran status. Together, we refer to all of these groups as "protected classes." Housing practices should not discriminate against or negatively affect these state and federal protected classes. HUD accepted the City's [Assessment of Fair Housing](#) (AFH) on December 13, 2017, and this plan must be updated every five years. The AFH (also referred to as the Analysis of Impediments to Fair Housing) looks at how our community is doing in carrying out Fair Housing practices. In addition to complying with the regulations, the AFH offers the opportunity to reconsider barriers to housing for protected classes of people, and see what strategies are needed to reduce those barriers.

What is the Consolidated Plan?

The Consolidated Plan is Bellingham's community choice – over a 5-year period – of how multiple sources of funding will be used in the community within the parameters of those funding programs. Housing and services funding comes to the City primarily from HUD Community Development Block Grant (CDBG), HUD

HOME Investment Partnership Program (HOME), the Bellingham Housing Property Tax Levy (Levy), and the Bellingham Affordable Housing Sales Tax (BAHST). The Consolidated Plan consists of a Needs Assessment and Market Analysis, as well as a 5-year Strategic Plan and first year Action Plan. Each year throughout the Consolidated Plan period, another Action Plan is developed and approved that follows the goals and strategies laid out in the Consolidated Plan. The Consolidated Plan updates build on the assessment, analysis and strategies in prior Consolidated Plans, incorporating updated language where necessary. In addition to complying with the regulations, the update of the City's Consolidated Plan provides the City with the opportunity to evaluate and reconsider local needs, address changes in applicable laws that may impact local services, and consider strategies for meeting the housing and services needs of the City.

Below is a snapshot of average annual allocations of the City of Bellingham's funding related to Consolidated Plan implementation:



Is this the best way programmatically for the City to continue allocating the various funding sources? The Consolidated Plan helps shape program priorities and allocations.

What is the Community Participation Plan?

This Community Participation Plan is a plan for how the City engages community members in the development and modification of the AFH and Consolidated Plan, and the implementation of these plans through the Annual Action Plan and Annual Performance Report processes.

The Plan is designed to encourage the public to participate in the development of all the plans and any substantial amendments to these documents. The community is encouraged to participate in the development and substantial amendment of plans and performance reports. The community generally has a minimum opportunity to provide comments of 30 days for the Consolidated Plan and AFH, and 15 days for Annual Action Plans and Performance Reports. Exceptions to these timeframes are occasionally granted for disaster response or other urgent situations consistent with HUD waivers, provided no less than 5 days are provided for public comments even in these urgent situations.

The City aims to take appropriate actions to encourage the participation of all its residents, including minorities and non-English speakers, as well as persons with disabilities. The City will take reasonable steps

to provide language assistance to ensure meaningful access to participation by non-English-speaking residents of the community, and to otherwise provide this plan and participation opportunities in a format accessible to persons with disabilities, upon request.

Community Participation Plan Goals

- Provide information to assist the public and stakeholders in understanding what the Consolidated Plan is, and why it is important;
- Seek early and continuous opportunity for the public and stakeholders to provide meaningful input;
- Offer a variety of opportunities for the public and stakeholders to give feedback directly to staff and appointed and elected officials;
- Make the process accessible and engaging to the public and stakeholders;
- Support community-driven planning;
- Explain past goals, strategies, and actions, and progress made toward implementation; and
- Use a flexible, adaptive approach to build on previous Consolidated Plans and continually improve.

Community Participation Plan implementation

The objective of this Plan is to establish how the City engages the public and stakeholders while updating and implementing the Consolidated Plan and Assessment of Fair Housing (AFH). The City employs a range of public participation strategies to encourage and facilitate widespread community participation in the planning process. The Plan is flexible and adaptive and may be refined as the process progresses.

The City makes HUD-provided data and any other supplemental information available to its residents, public agencies, and other interested parties. The City also provides information that includes the amount of assistance the City expects to receive (including grant funds and program income) from HUD and local funding sources, and the range of activities that may be undertaken, including the estimated amount that will benefit low- and moderate-income households. The City minimizes displacement of people in its housing program implementation, in accordance with its [Housing Development Guideline and Procedure Handbook](#).

All community input timely received will be considered related to the AFH and Consolidated Plan, as well as Annual Action Plans created under the Consolidated 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 AFH, Consolidated Plan, and Action Plan (as applicable).

Consolidated Annual Performance Reports (CAPER) assessing performance under the Consolidated Plan are also subject to public review and comment. Notice will be published in the paper, with at least 15 days allowed and a public hearing held to receive comments on the performance report prior to submitting it to HUD for approval (or, in the presence of an urgent situation and HUD waiver, no less than 5 days for the same). All verbal comments or views received in writing will be considered and summarized within or as an attachment to the performance report.

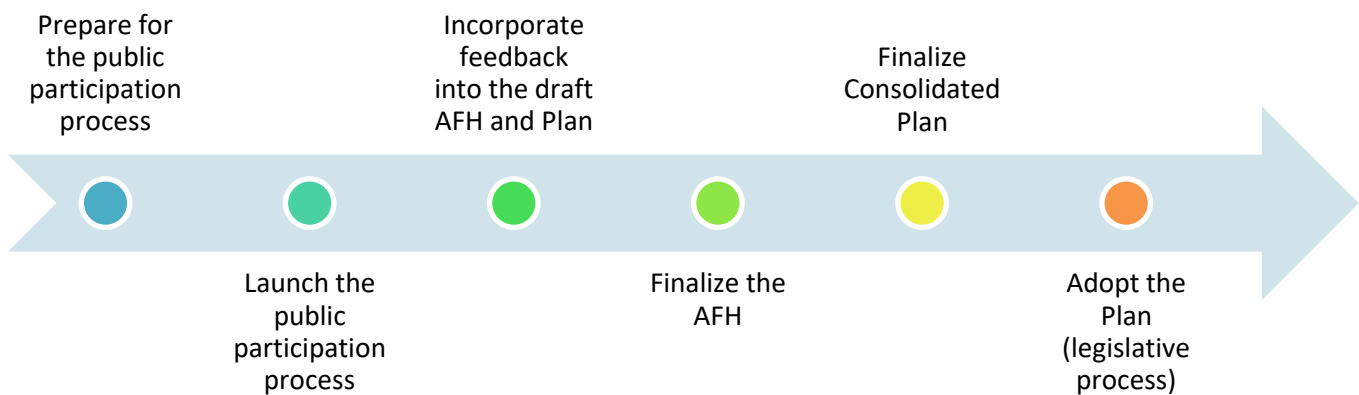
The City may receive complaints from its residents related to the Consolidated Plan, amendments, AFH, revisions, action plans, and the performance report. The City will track all concerns and comments and they will be shared with decision-makers. Those who ask for clarification or responses will receive a reply within 15 working days.

Accommodations

Opportunities for public comment and involvement will be offered in various forms, times, and venues in order to have options that are convenient to potential and actual beneficiaries, and with accommodation for persons with disabilities. Anyone may request reasonable accommodations with prior adequate notice to the City. An alternative form of materials may also be available to persons with disabilities, upon request. The City will hold at least one public hearing for both the Consolidated Plan and AFH before the proposed plans are published for comment.

City staff will make themselves available for technical assistance to groups representative of persons of low- and moderate-income upon request, if assistance is needed in commenting on the AFH, on the Consolidated Plan, on an Annual Action Plan, or in developing proposals for funding assistance under any of the programs covered by the Consolidated Plan. Instructions for requesting assistance will be included with all published materials.

For the purposes of the development of a new Consolidated Plan, the City implements this Community Participation Plan in the following manner:



1.5 years prior to Consolidated Plan due date

Prepare for the public participation process

Staff attends trainings and begins to review the goals, strategies, and actions in the existing Consolidated Plan and Assessment of Fair Housing. The public and *stakeholders* are introduced to the process of the plan updates at the October and November Community Development Advisory Board (CDAB) meetings and a November City Council meeting, as well as various stakeholder group meetings such as the Whatcom Coalition to End Homelessness and/or its subcommittees.

At least 1 year prior to Consolidated Plan due date

Launch the public participation process

Staff begins soliciting feedback gathered through stakeholder meetings and other means (e.g. emails, Facebook page, phone calls, etc.) to ensure that the feedback solicited covers the whole range of stakeholders relevant to the AFH and Consolidated Plan. Staff attends regular stakeholder meetings and makes an effort to establish points of contact with the full range of stakeholder groups to ensure all relevant parties are adequately engaged in the process. Every effort will be made to ensure that stakeholder feedback is representative of the population of the City of Bellingham as a whole.

Within 1 year of Consolidated Plan due date

Incorporate feedback into the draft Assessment of Fair Housing and draft Consolidated Plan

Staff increases efforts to solicit feedback through a community survey and continued stakeholder meetings. Feedback gathered through the meetings, survey, and other means is incorporated into the draft Assessment of Fair Housing and draft Consolidated Plan. Staff presents the draft language to relevant City advisory boards and stakeholder groups.

Finalize and complete the Assessment of Fair Housing and continue development of Consolidated Plan

A public hearing and subsequent online distribution provide the public and stakeholders with an opportunity to comment on elements of the draft Assessment of Fair Housing prior to the CDAB review, finalization, and subsequent City adoption (the AFH is typically completed about 6 months prior to the final Consolidated Plan).

Staff gives a preliminary update to City Council on the status of the Consolidated Plan.

Within 6 months of Consolidated Plan due date

Finalize the Consolidated Plan

Staff finalizes draft versions of all chapters of the Consolidated Plan. A public hearing provides the public and stakeholders with an opportunity to comment on elements of the draft plan prior to the Community Development Advisory Board review and discussion. Stakeholder comments and recommendations are forwarded to CDAB. The stakeholder groups have an opportunity to review the work, and all comments are compiled and made public.

Before adoption of the Consolidated Plan, the City makes available to the community and stakeholder groups the amount of assistance the City expects to receive (including grant funds and program income) and the range of activities that may be undertaken, including the estimated amount that will benefit persons of low and moderate income.

Within 2 months of Consolidated Plan due date

Start and complete the legislative process (adopt the plan)

The legislative process includes CDAB final recommendations, Mayoral review and City Council approval. The process culminates in the adoption of a new Consolidated Plan before the typical federal submission deadline of May 15 (or otherwise published submission deadline).

Amendments

If changes are proposed to the City's Consolidated Plan after final approval, any changes reflecting a newly proposed activity or major funding allocation change will constitute a substantial amendment. Major funding allocation changes include changes in the use of HUD or local funds from one activity to a newly proposed activity. Adjustments of allocations or program income to reflect actual (rather than anticipated) income, updates of home values through annual market studies, pursuit of contingency projects, and similar adjustments, will not be considered substantial amendments; nor will adjustments in activity funding, provided no new activities are proposed without a substantial amendment process. A revision of the AFH will be undertaken whenever a material change takes place – a substantial change in the circumstances of the City broadly affecting the information on which the AFH is based. Substantial amendments to the Consolidated Plan and AFH revisions trigger a 30-day public comment period and public hearing process (with the exception of urgent situations reflected by a HUD waiver, which may allow for no less than 5 days for the same).

Tactics for community participation

City Community Development Advisory Board

The CDAB is engaged throughout the process and updated during their regular meetings starting one year prior to the Consolidated Plan adoption deadline. They review and provide feedback on components of the process, and review the results of stakeholder engagement and public input.

Stakeholder list outreach

Staff maintains a list of interested members of the public and stakeholders who are notified regularly of public meetings, process updates, and when materials and drafts are available for written comment. See Appendix 1 for a list of current stakeholder contacts. Please note, this is not an exhaustive list.

Early in the planning process, staff will invite all community stakeholder groups to collaborate on public engagement to gather feedback. Staff will regularly review the list of stakeholders we've been in touch with and make targeted outreach efforts if there are any priority populations that we haven't heard from.

CDAB public hearings

CDAB conducts a public hearing to gather public comment on elements of the draft AFH and draft Consolidated Plan before developing recommendations that are forwarded to the Mayor and City Council. Public notice of the public hearings is published in the Bellingham Herald and on the City's website prior to the date of the hearing. In addition to the required noticing procedures, notice is also provided through such means as a press release, the City's Facebook page and the stakeholder list.

Stakeholder groups

Staff regularly attends existing stakeholder group and advisory board/committee meetings to present information and include the public in venues typically attended by key stakeholders. For example, meetings with residents of public housing or beneficiaries of housing assistance programs, and cross-sectoral groups such as the Coalition to End Homelessness and its subcommittees.

Staff may identify additional stakeholder groups affected by the Consolidated Plan that are not adequately represented in our existing stakeholder list and attempt to establish a point of contact within those groups. This may include neighborhood associations, or groups at the school district, senior center, or emergency response departments. If additional meetings are scheduled, they will be held at a time and location that is convenient for stakeholders to participate.

Engage Bellingham

The City will utilize the Engage Bellingham platform throughout the process to solicit comments and questions, and keep the public up to date on the plan as it is updated. This online platform was introduced in 2020 and has been a main interface for online public participation.

Webpage

All materials associated with the plan update, are posted on a project-specific webpage on the City's website. Additionally, feature stories are posted on the homepage of the City's website and on the City's social media pages.

Online surveys

One year prior to the Assessment of Fair Housing submission to HUD, the City of Bellingham conducts a comprehensive residential survey which collects public views about issues facing the community. This includes priorities such as housing affordability and homelessness. Staff uses insights from this survey to inform our information gathering and community participation processes.

An online survey is distributed within the year prior to Consolidated Plan submission to assess local fair housing issues, and goals of the existing Analysis of Impediments to Fair Housing or Assessment of Fair Housing serves as a starting point for the survey questions. City staff takes the lead in its development. Members of the public and stakeholders are notified of the survey through a variety of channels to enable participation of diverse groups. This survey is translated into Spanish (with an assessment of additional language translation that may be needed).

Social media

Process updates and notice of public meetings are posted on all City social media, and partner organizations are encouraged to cross-post notices to increase our reach.

Press releases and media advertisements

The City issues press releases to local and regional media and subscribers, and advertises the survey and public meetings in the Bellingham Herald, on the local cable television channel, BTB10, and local radio station KGMI.

Open House

An open house is utilized to present the draft updated Consolidated Plan, including the first year Action Plan to the public and stakeholders in the early stages of the legislative process. Staff provides an overview of the process to date; draft goals, strategies and actions; and next steps. Notice of this meeting is provided through such methods as a press release, the Bellingham Herald, the City's website, the City's Facebook page and the stakeholder distribution list.

City Council

The City Council's relevant subcommittee periodically reviews and discusses the Consolidated Plan update. All meeting dates and materials are posted on the City's website.

Once complete, the City Council reviews the draft plan forwarded by CDAB and the Mayor. In addition to the required noticing procedures, notice is also provided through such means as a press release, the City's Facebook page and the stakeholder list. City Council takes action to adopt the final Consolidated Plan in April or early May.

Contact Information

Written comments are welcome at any time during the Consolidated Plan update process. To be considered for the CDAB public hearings, formal written comments should be submitted by the deadline included in the public notice information. Staff publishes all formal comments, in addition to staff's responses, on the City's website prior to public hearings and work sessions. To find out more about the Community Participation Plan and to comment on the draft Consolidated Plan, please contact the City's Housing & Services Program Manager, Development Specialist, or Housing Programs Specialist, at the contact information listed below.

Planning and Community Development Department
210 Lottie Street
Bellingham, WA 98225
Phone: 360-778-8300 | Fax: 360-778-8302 | Email: cd@cob.org

To be notified of up-coming meetings and process updates, send an email to: Community Development Administrative Secretary at cd@cob.org. All documents related to the Plan update are located here: <https://cob.org/services/housing/planning-and-performance-documents>.

The City of Bellingham does not discriminate on the basis of race, color, national origin, sex, religion, age, families with children, and disability in employment or the provision of services. With five business days' notice, special accommodations will be provided, and materials will be provided in alternative formats. Refer any inquiries or complaints related to HUD regulations implementing Section 504 to the Housing & Services Program Manager. Contact 778-8385 (voice) or 711 (TTY).

Appendix 1. Members of the Public and Stakeholders

Staff will use a variety of tactics for encouraging citizen participation and will follow HUD guidelines for including specific stakeholder groups as described below. All community members will have multiple opportunities to engage in the planning process and submit feedback. The following is not an all-inclusive list.

Community Members

Business Owners
 City Residents
 Employees
 ESL / Minority populations
 Homeless/formerly homeless residents
 Key community influencers
 Neighborhood associations
 Residents of public and assisted housing developments
 Seniors
 Special needs populations
 Students

Bellingham Technical College
 HOME Consortium of Skagit, Island, and Whatcom counties
 Lummi Nation
 Nooksack Indian Tribe
 Northwest Indian College
 U.S. Department of Social & Health Services (DSHS)
 Washington State Dept of Commerce
 Western Washington University
 Whatcom Community College
 Whatcom County Health Department
 Whatcom Transportation Authority

Regulatory

City Council
 U.S. Department of Housing & Urban Development (HUD) - Seattle Field Office

Advisory to City Council and/or Mayor

Community Development Advisory Board (CDAB)
 Homeless Coordination Committee (interdepartmental)

Other Advisory Committees

Healthy Whatcom
 Whatcom County Coalition to End Homelessness (and Steering Committee, other subcommittees)
 Whatcom County Housing Advisory Committee (and subcommittees, including Affordable Housing Planning Group)
 Whatcom County Racial Equity Commission

Other Public Agencies

Bellingham / Whatcom County Housing Authorities
 Bellingham School District

Social Service Agencies

Bellingham Childcare & Learning Center
 Bellingham Food Bank
 Brigid Collins Family Support Center
 Bellingham Tenants Union
 Bellingham Public Library
 Catholic Housing/Community Services
 Center for Independence (North Sound)
 Community-2-Community Development (C2C)
 Compass Health
 Domestic Violence Sexual Assault Services (DVSAS)
 Hearing, Speech and Deaf Center (North Sound)
 Goodwill
 Immigrant Resources & Immediate Support (IRIS)
 Interfaith Coalition
 Kulshan Community Land Trust
 Lake Whatcom Residential and Treatment Center
 LAW Advocates
 Lighthouse Mission Ministries
 Lydia Place
 Max Higbee Center
 Mercy Housing Northwest

NAMI Whatcom (local affiliate of the
National Alliance on Mental Illness)
North Sound Mental Health
Northwest Regional Council
Northwest Youth Services (NWYS)
Opportunity Council and Volunteer Center
of Whatcom County
PeaceHealth
Pioneer Human Services
Rebound of Whatcom County
Salvation Army
SeaMar Community Health
Sean Humphrey House
Skookum Kids
SUN Community Services
The Arc of Whatcom County
Unity Care Northwest
Whatcom Council on Aging
Whatcom Dispute Resolution Center
Whatcom Early Learning Alliance
Whatcom Family and Community
Network

Whatcom Literacy Council
Young Men's Christian Association
(YMCA)
Young Women's Christian Association
(YWCA)

Business/Development and Philanthropic

Association of Realtors
Bellingham/Whatcom Chamber of
Commerce
Broadband internet providers
Building Industry Association
Chuckanut Health Foundation
City and County Employers
NW Workforce Development Council
Small Business Development Center
Technology Alliance Group
United Way
Whatcom Community Foundation
Whatcom Housing Alliance
WorkSource Whatcom