# CITY OF FLINT MICHIGAN



# CITIZEN PARTICIPATION PLAN (Amended April 2013)

# CITY OF FLINT CITIZEN PARTICIPATION PLAN

# I. <u>INTRODUCTION</u>

#### Purpose

Citizen Participation is a valuable and essential component of Housing and Community Development (Consolidated) programs. The knowledge and motivation of the community aids in the development, implementation, and evaluation of programs that are responsive to community needs. The City is committed to full and meaningful citizen participation. This Citizen Participation Plan describes the means by which the City of Flint will provide for citizen participation for Housing and Community Development programs.

A Consolidated Plan which includes a Housing and Community Development Five-Year Strategy and Annual Plan guides the delivery of consolidated programs. The Consolidated Plan currently incorporates the federal Community Development Block Grant (CDBG), HOME Investment Partnership (HOME), Emergency Solutions Grant (ESG), Section 108 Loan Guarantee, EDI Grant, and all federal recovery programs, including Neighborhood Stabilization Program (NSP1, NSP2, and NSP3). The Consolidated Plan and Citizen Participation Plan are established according to requirements of the U.S. Department of Housing and Urban Development, and may be revised to comply with any future amended requirements.

#### Background

Citizen participation has been incorporated into Community Development (CD) programs since the inception of the Community Development Block Grant program in Flint in 1974. A Mayor's City-Wide Advisory Committee (CWAC) was established in the City Code of Ordinances. This policy established the CWAC with forty-five citizen representatives appointed by the Mayor and Flint City Council, to act in an advisory capacity to the City of Flint in connection with all community and economic development programs.

The Consolidated Plan of 1995 was developed with great emphasis on citizen participation. Citizen input was sought on several occasions over the course of ten months, at official public hearings, community meetings, and agency forums. City staff joined with officials of other governmental bodies and with citizen representatives, to seek public comment on community needs. The Community Development Citizens' Committee was considerably involved throughout the development of the Consolidated Plan.

At several stages of the development process, notices were mailed to an extensive list of individuals and organizations. Notices were published in a broad array of community publications, including publications serving minority communities and Spanish speaking residents. Flyers were also posted or distributed in numerous center city neighborhood locations, including public housing complexes.

These efforts to encourage citizen participation resulted in a number of citizen comments. Further detail on the citizen participation activities for the 1995 Consolidated Plan, along with summaries of citizen comment and associated responses may be found in the 1995 Consolidated Plan.

# II. <u>GENERAL PROVISIONS OF THE CITIZEN PARTICIPATION PLAN</u>

# **Citizen Input**

This Plan provides for citizen input on the Consolidated Plan, on any substantial amendments to the Consolidated Plan, and on the performance of programs described in the Consolidated Plan. The Consolidated Plan currently incorporates the federal Community Development Block Grant (CDBG), HOME Investment Partnership (HOME), Emergency Solutions Grant (ESG), Section 108 Loan Guarantee and EDI programs, as well as other federal recovery programs, including all of the Neighborhood Stabilization Programs (NSP).

The following general provisions apply to the Consolidated Plan and activities incorporated in the Consolidated Planning process. Individual programs may have additional provisions and procedures for citizen participation.

# **Public Comment Opportunity**

Opportunity will be provided for public comment on the Consolidated Plan, on any substantial amendments to the Consolidated Plan, on performance of incorporated programs, and substantial amendments to the Citizen Participation Plan. The City will consider any comments or views of citizens received in writing, or orally at public hearings. A summary of written public comments and a summary of comments or views not accepted and the reasons therefore will be included with the submission to the U.S. Department of Housing and Urban Development (HUD) of the Consolidated Plan, substantial amendments to the Consolidated Plan, substantial amendments to the Citizens Participation Plan, and the Performance Report under the Plan.

The City will publish notice of opportunity to comment on the Consolidated Plan, substantial amendments to the Consolidated Plan, substantial amendments to the Citizens Participation Plan, and Performance Report in a newspaper of general circulation with adequate advance. Notices will provide sufficient information about the subject of the comment period to permit informed citizen comment. In cases for which summaries or description of documents are published, citizens will also be provided the opportunity to review the full document(s).

An effort will be made to publish notices in publications serving minority communities and foreign language-speaking residents, dependent upon availability and publication deadlines. The City will also make an effort to mail notices to affected organizations funded under the Consolidated Plan, to local media and to major community service providers, including those serving minority communities and special needs populations. Notices will include information on assistance requests for accessibility for persons with physical disabilities or language barriers.

#### Consolidated Plan Comment Period

A minimum of 30 days will be provided for public comment on the Consolidated Plan and any substantial amendment to the Plan. The public comment period will begin the day the notice is published.

Any action required to authorize entering into contracts as a result of the proposed Consolidated Plan or Consolidated Plan substantial amendment will not be taken until the end of the 30-day comment period.

Consolidated Annual Performance Report (CAPER) Citizens Participation Plan

#### Substantial Amendments to Citizens Participation Plan

A minimum of 15 days will be provided for public comment on the Performance Report under the plan, the Citizen Participation Plan, and any substantial amendments to the Citizen Participation Plan.

Action is not required prior to submission of the Performance Report, Citizen Participation Plan, or substantial amendments to the Citizens Participation Plan.

#### **Public Hearings**

At least one public hearing will be held prior to submission of the Consolidated Plan to obtain citizen input on the proposed Plan and funding amounts; at least one hearing regarding community needs will be held prior to publication for comment on the proposed Consolidated Plan; at least one hearing will be held prior to submission of Section 108 Loan and EDI Grant applications and at least one hearing will be held prior to submission of the Annual Report to obtain citizen review and comment on program performance. These may be either official City Council public hearings, or hearings conducted by the Department of Community and Economic Development to provide for the greatest opportunity for public comment.

For all hearings, the City will aim to provide balanced accessibility as regards location, time and format, particularly over the course of a several year period. Coordination will be encouraged with other communities involved with community development programs. All hearings will be held in locations accessible to persons with mobility impairments. Assistance will also be made available upon request for accessibility for sensory limitations or language barriers such as sign language interpreters or language translators for hearings for which a significant number of non-English speaking persons are expected to participate.

Special topic meetings may be held to discuss the impact of a significant new project. Examples might be a neighborhood meeting or meeting with community representatives regarding a major public construction project or housing development, or workshops convened by the Department to provide technical assistance or discuss new policies or procedures.

#### **Public Information and Access to Records**

The City has adopted Standard Operating Procedures for document management. These procedures are attached to this Citizens Participation Plan.

In general, the Consolidated Plan and significant related documents for incorporated programs will be available for public review at the main office of the City of Flint Department of Community and Economic Development during normal business hours. The draft and final Consolidated Plan and annual Performance Report will be made available for review at additional accessible public locations, including the Flint City Clerk's office, main branch of the Flint Public Library, office of the Genesee County Metropolitan Planning Commission, and the Flint Housing Commission. In addition to the Consolidated Plan and Amendments, other documents that may be available for review include the Citizen Participation Plan, amendments to the Consolidated Plan and Citizens Participation Plan, neighborhood redevelopment plans, and proposed brownfield plans and pending Section 108/EDI/BEDI applications. These materials will be made available in a form accessible to persons with disabilities upon request.

Many other records are available for review upon advance request, such as prior year program applications and performance reports, copies of applicable federal regulations and laws, copies of funding proposals and contracts for incorporated Consolidated Plan programs, and environmental reviews and audits.

Summary documents for incorporated Consolidated Plan programs may also be maintained and provided to the public free of charge upon advance request. Such documents include project descriptions and funding; a fact sheet of cumulative CDBG program accomplishments; a Consolidated Target Area map; and income eligibility guidelines.

Copies of relevant summary documents will also be made available at public hearings and meetings. Citizen questions or requests for information recorded at public hearings will be responded to within 15 working days whenever practical.

# **Technical Assistance and City Staff Support**

The Department of Community and Economic Development will endeavor to respond to all reasonable requests for technical assistance or information for community groups, applicants for funding and citizen advisory boards for Consolidated Plan incorporated programs.

# III. <u>REPRESENTATIVE CITIZEN PARTICIPATION</u>

#### **Citizen Representation**

In addition to the many opportunities for citizens at large to provide input for housing and community development programs, citizen representatives considerably bolster citizen participation. Citizen advisory committees, client representation on organizational boards, and the advocacy roles of organizations serving program clients, all provide important representation of citizen views to housing and community development programs.

#### **Organizational Advocacy**

The City of Flint is fortunate to possess a strong network of community organizations and agencies that actively advocate for the needs of their clients. The City of Flint will make every effort to engage in continuing communication with organizations that serve persons who potentially may benefit from housing and community development programs. Notices of

housing and community development public comment opportunities will be sent to organizations such as the Flint Housing Commission, community-based social service complexes in CDBG target areas, multi-service community agencies serving minority populations, and representative agencies serving persons who are homeless, who have disabilities, who are elderly, or who have AIDS/HIV. City staff will encourage cooperation with such organizations through such means as sharing of information; service on community committees and task forces that address housing and community development issues; and special issue forums to solicit agency input.

# Citizen Representation on Organizational Boards

The representation of actual or potential program beneficiaries on boards of organizations implementing housing and community development programs serves to strengthen citizen input to housing and community development programs. Federal requirements for certain of the Consolidated incorporated programs ensure such representation in specific areas. In particular, the HOME program requires that low/moderate income persons serve on the boards of funded Community Housing Development Organizations (CHDO's). Additionally, the Emergency Solutions Grants program requires that homeless persons serve on the boards of funded provider organizations or in other decision-making capacities.

# IV. <u>SPECIAL ISSUES</u>

# Complaints

Every effort will be made to consider complaints as potentially informative responses to programs. Any written complaints will be maintained on file and responded to in a substantive manner within 15 working days whenever practicable.

Generally, unresolved complaints may be pursued sequentially by citizens to the Director of Community and Economic Development, then City Administrator. Citizens may also file complaints directly with the U.S. Department of Housing and Urban Development. Service providers may have additional specific procedures for citizen complaints or grievances.

# **Substantial Amendments**

#### Consolidated Plan Substantial Amendments

The City of Flint will amend its approved Consolidated Plan whenever it makes substantial amendments to the Plan. Substantial amendments are defined as follows:

- 1. A change in allocation priorities
- 2. A major change in the method of distributing funds.
- 3. The addition or deletion of a Priority Objective from the Consolidated Plan Five Year Strategy, unless due to circumstances not under the control of the City of Flint.
- 4. A significant reorientation of program funding priorities in the Consolidated Plan Five Year Strategy due to a major change in local economic conditions or population characteristics.
- 5. New activities exceeding 15% of the federal program grant (CDBG, HOME, or ESG) year from which the funding is derived, unless arising from state or federal

declarations of emergencies or disasters and activities occur with City Council review and approval.

These substantial amendments are subject to a 30-day public comment period through published notice in a newspaper of general circulation.

# Citizens Participation Plan Substantial Amendments

The City of Flint will amend its approved Citizens Participation Plan whenever it makes substantial amendments to the Plan. Substantial amendments are defined as follows:

- 1. Changes in times required for comment periods or notice publications
- 2. Changes to the City Wide Advisory Committee structure
- 3. Changes to the Consolidated Plan substantial amendment policy

# Minor Amendments

#### Consolidated Plan Minor Amendments

Minor amendments to the Consolidated Plan are defined as follows:

- 1. Change in scope, location or intended beneficiaries of a CDBG, ESG, or HOME activity described in the Consolidated Annual Action Plan, such that:
  - The activity's planned units of service are reduced
  - The activity's service area or boundaries change
  - The activity's intended beneficiaries change yet still meet regulatory guidelines
- 2. A change in vendor, but the activity remains substantially the same
- 3. Deletion of an activity described in the Annual Action Plan
- 4. Budget increase of an already approved activity which does not exceed 15% of the federal program grant amount for the fiscal year from which it is funded

These are not subject to a public comment period, but will be incorporated and submitted annually to HUD:

# Citizens Participation Plan Minor Amendments

1. Any modifications to the Citizens Participation Plan not described above as a substantial amendment will be considered a minor amendment. These are not subject to a public comment period, but will be incorporated and submitted annually to HUD:

# Meetings

Citizens may attend any official meeting of the full committees of the City Council. Meeting schedules and agendas are available upon request.

# **Anti-Displacement Policy**

The City is committed to minimizing the involuntary and permanent displacement of residents as a result of federally assisted projects. The City's CDBG, HOME and ESG programs are operated under a Residential Anti-Displacement and Relocation Assistance Plan as required by HUD. A copy of this plan is available upon request. While no displacement is expected as a result of proposed Community Development activities, the City is prepared to similarly assist any resident found to be so displaced. Relocation benefits, including payment for replacement housing and reasonable moving expenses, will be offered to residents who are displaced. Benefits and procedures for displacement would be carried out in Performance with the Uniform Relocation Act or Section 104(d) of the Housing and Community Development Act of 1987, as amended.

#### **Additional Information**

Any question not covered here should be brought to the attention of the Department of Community and Economic Development staff person assigned to the Citizens' Participation Plan. Department of Community and Economic Development staff will address the item of concern in writing within fifteen (15) working days.

The Department of Community and Economic is located in Flint City Hall, North Building, Room N102, 1101 S. Saginaw Street, Flint, Michigan 48502. Telephone 810.766.7436.

The public is urged to use this plan, attend the meetings and public hearings and to become involved.

Citizens are advised to call the Department of Community and Economic Development to verify dates prior to meetings.

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