
City of Lansing

Citizen Participation Plan



Andrew Schor, Mayor

*Revised and adopted by Lansing City Council on
May __ 2020*

*Prepared for the U.S. Department of Housing and Urban Development
by the City of Lansing, Michigan
Department of Economic Development and Planning
316 N. Capitol Avenue
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SECTION 1: INTRODUCTION

The City of Lansing's Citizen Participation Plan (CPP) for the Community Development Block Grant (CDBG) Program was adopted by the Lansing City Council in 1984. It was amended in 1995 to reflect new Federal requirements regarding citizen participation in community development projects. It was revised again in 2010 and 2012 to streamline the Citizen Participation process, clarify procedures and update the methods for public notice. The 2020 revision to the Citizen Participation Plan identifies and address reduced time for public comments and defines "reasonable notice and opportunity to comment" in a crisis situation. This Citizen Participation Plan applies to the City's Community Development federal entitlement grant programs. In addition to CDBG, the City's Community Development entitlement programs include HOME and Emergency Solutions Grants (formerly Emergency Shelter Grant) programs. The Citizen Participation process in the Community Development Program is intended to assure that the citizens of the community, and organizations concerned with housing and community development will have opportunity to participate in the planning and utilization of community development funds.

Citizen participation is mandated as part of the City's Annual Consolidated Strategy and Plan Submission (CSPS) and application for federal funds which is due to the Department of Housing and Urban Development in May. It applies to substantial amendments to that plan, which can occur at any time and to Consolidated Annual Performance and Evaluation Reports (CAPER) which are due in September. This document describes procedures which have been simplified and clarified to allow citizens easier access to the planning and application process. The plan attempts to maintain and strengthen the cooperative effort already established between citizens and the City by providing the forum for more frequent interaction, review and comment. The plan also recognizes the need for both City-wide representation and target area representation in the community development planning process. It should be noted that opportunity for citizens to participate in community development goes beyond the formal process described in the Citizen Participation Plan. Input through involvement with City staff, formal boards, planning committees, ad hoc advisory groups and through interaction with the Mayor and City Council will continue to provide additional opportunities for day-to-day citizen involvement.

The Citizen Participation process for the Consolidated Strategy and Plan Submission (CSPS) and Consolidated Annual Performance and Evaluation Report (CAPER) is repeated annually for each grant funding cycle. The process involves engaging citizens for input in assessing community development needs, setting priorities, planning community development projects, allocating funds to them and reporting accomplishments. Citizen Participation is invited formally at several times throughout each year mostly through public notices, at public hearings and during public comment periods. Informal Citizen Participation is welcomed at any time.

SECTION 2: OVERALL CITIZEN PARTICIPATION PROCESS

The City of Lansing will meet the citizen participation requirements of the Consolidated Strategy and Plan Submission (CSPS) under Section 91.105 of the Federal regulations, as amended, by providing citizens:

- a. a reasonable opportunity to comment on the Annual Consolidated Plan, substantial amendments to that plan and the CAPER;
- b. information that includes the amount of assistance and the range of activities that may be undertaken;
- c. a statement identifying how the information will be available for public review and comments, including time lines and response to those comments;
- d. notices of two public hearings for the Annual Consolidated Plan to receive comments, views and proposals of citizens;
- e. a notice and an opportunity to comment on substantial amendments in writing or orally at public hearings;
- f. a notice and an opportunity to comment on annual performance reports,
- g. times and locations of hearings convenient to potential and actual beneficiaries and with accommodations for persons with disabilities;
- h. information about how to request technical assistance or file a complaint; and
- i. information about how low-income and minority groups will be notified of the citizen participation processes.

The City will make a reasonable effort to assure that the public has ample opportunity to comment on issues contained in the Citizen Participation Plan. In the event that citizen participation is needed in a crisis situation to gather/respond to the effects of an emergency, such as the COVID-19 pandemic, the City may seek waivers as allowed by HUD, and reduce the required comment period to a “reasonable notice of opportunity to comment” of not less than five (5) days, upon public notification on the city’s website.

SECTION 3: CONSOLIDATED STRATEGY AND PLAN SUBMISSION (CSPS)

A.GENERAL INPUT

The City may hold community meetings or request input. Notices of those community meetings will be disseminated to stakeholder groups and organizations including: neighborhood watch groups and associations, other local jurisdictions, state agencies, other City departments, special needs groups and organizations and groups concerned with housing and related supportive services and other community development activities.

In addition, the City will focus on encouraging participation of minority groups, low and moderate income persons, particularly those residing in low and moderate income areas.

B. NEEDS HEARING (CSPS) (FIRST PUBLIC HEARING)

An initial public hearing (Needs Hearing) will be conducted before the Lansing Planning Board to provide citizens an opportunity to present their views on community development and housing needs. The Needs Hearing shall be held in September - December prior to the development of a proposed statement of community development objectives and use of funds. Information will be published as identified in the Publishing of Notices section of this Plan.* Input received at the public hearing will be considered in preparing the Proposed Statement of Community Development Objectives and Projected Use of Funds.

C. HEARING ON PROPOSED STATEMENT OF COMMUNITY DEVELOPMENT OBJECTIVES AND PROJECTED USE OF FEDERAL FUNDS (STATEMENT)

The City of Lansing Department of Economic Development and Planning (EDP) shall prepare and publish a Proposed Statement of Community Development Objectives and Projected Use of Funds (Proposed Statement.) The Planning Board shall conduct a second public hearing in January/February on the Proposed Statement which will include a description of objectives and projected budget for uses of funds for the upcoming fiscal year. Notices of the hearing will be published according to the Publishing of Notices Section of this Plan.

After considering citizen comments, the Planning Board shall make modifications to the Statement as appropriate, approve and forward the document to the Mayor with the recommendation that it be incorporated into the CSPS and referred for adoption by the Lansing City Council.

D. COMMENT PERIOD FOR DRAFT CSPS

The draft CSPS shall be prepared by the City and made available for review and comment by the public prior to submission of the plan in May to the Department of Housing and Urban Development. A summary of the plan shall be published in February/March. Notices of the availability of the document will be published according to the Publishing of Notices Section of the Plan. Citizens will be furnished with information concerning the amount of Community Development Block Grant (CDBG), HOME and Emergency Solutions Grant (ESG) funds expected to be available for community development and housing activities, and the range of activities that may be undertaken with these funding sources.

The published notice will also include information that a summary and complete copy of the plan will be on file and available in the office of the Lansing City Clerk, at the Capitol Area District Library, at the Department of Economic Development and Planning as well as on the City's website. A summary of the plan will be e-mailed to organizations, groups

and agencies known to be concerned with or affected by the use of Housing and Community Development Resources in the community.

E. FINAL PUBLIC HEARING

The final public hearing will be held before City Council in April/May. City Council will follow their established notification process which may include publishing in the Lansing State Journal or the Lansing City Pulse or other publication of general circulation.

The City will provide citizens and organizations thirty (30) days to comment on the proposed CSPS, unless waived as allowed by HUD. The comment period shall commence from the date of publication of the summary in the Lansing State Journal, Lansing City Pulse or other publication of general circulation, in February. The Proposed Statement shall contain sufficient detail including locations of activities where appropriate, to allow citizens to determine the degree to which they may be affected. In addition, citizens will be furnished information on:

- a. the amount of assistance the City expects to receive and the range of activities that may be undertaken, including the estimated amount that will benefit persons of low and moderate-income.
- b. Plans to minimize displacement of low and moderate income persons as a result of CDBG assisted activities and to assist persons that are so displaced. Information relative to displacement and relocation procedures are included in the City's **Residential Antidisplacement and Relocation** Assistance Plan, prepared pursuant to Section 104 (D) of the Housing and Community Development Act of 1974 as amended. Copies are available upon request from the Development Office of the Department of Economic Development and Planning.
- c. Estimated amounts that will be used for activities that benefit low and moderate income persons.

Written or oral comments or views of citizens submitted during the thirty (30) day comment period or submitted at the public hearing will be considered prior to adoption of the final CSPS. A summary of comments or views, written and oral, and the response of the City will be included in the final CSPS document.

The City shall hold all public hearings related to the CSPS at a designated location (with prior notice) in Lansing, MI. The meetings will be held during the evening hours to better afford citizens an opportunity to attend and participate in the process. The facility will be barrier free to accommodate persons with mobility limitations/disabilities. In the event it is anticipated that a significant number of non-English speaking residents may attend a public hearing, the City will provide a resource person for translation purposes. The City will work in a partnership with the Lansing Housing Commission (LHC) on an ongoing basis to develop the CSPS. The LHC will facilitate the participation of public housing residents in the process.

F. Publishing of Notices

Notice of the hearing and of availability of the CSPA for review will be published in the Lansing State Journal, Lansing City Pulse or other publication of general circulation, mailed to known citizen groups and other organizations concerned with housing and community development issues, and will appear at City Clerk's office, Capital Area District Library, Lansing and on the City's website. Copies of the document will also be made available upon request. The comment period shall commence on the date following the publication of the notice(s).

SECTION 4: CONSOLIDATED PLAN AMENDMENTS

A. Amendment Requirement

The City of Lansing will follow its CSPA unless or until a CSPA amendment is required based on the following:

- If the City elects not to carry out an activity contained in its approved CSPA; or
- If the City elects to carry out activities other than those described in the approved CSPA; or
- If the City wishes to delete or add an activity to those activities described in CSPA; or
- If the City proposes to make any substantial change** in the use of CDBG, HOME, and/or ESG funds from one eligible activity to another;

The citizen participation requirements described above shall apply to applications or submissions to the Department of Housing and Urban Development, unless otherwise specified by HUD, including the Section 108 Loan Guarantee Program.

**Unless substantial change is otherwise defined by HUD regulations or current legislation, a "substantial change" shall mean:

- a. the City proposes to use more than fifteen percent (15%) of the entitlement amount approved for the affected program year, other than that amount for local option activities, to undertake one or more new activities;
- b. the City proposes to alter the stated purpose, location or class of beneficiaries of previously approved activities whose cost exceeds fifteen percent (15%) of the entitlement amount for the affected program year;
- c. the combination of proposed new activities, other than local option activities, and changes in the purpose, location or class of beneficiaries of previously approved activities involves more than fifteen percent (15%) of the entitlement amount approved for the affected program year;
- d. the cumulative effect of a number of smaller changes involving new activities, other than local option activities, or changes in the purposes, location, or class of beneficiaries of approved activities exceeds fifteen percent (15%) of the entitlement amount approved for the affected program year; or
- e. the City proposes to utilize funds for an eligible activity that is not consistent with

the goals and objectives stated in the Five Year or Annual CSPA.

B. PUBLIC PARTICIPATION AND HEARING PROCESS - CONSOLIDATED PLAN AMENDMENTS

The City shall make available to the public and shall submit to the Department of Housing and Urban Development (HUD) a description of any substantial changes adopted for the current year CSPA. The Citizen Participation process used in consideration of an amended use of funds shall be that part of the process which includes public notification of the proposed changes and will be published in accordance with Section 3.F herein, mailed to known citizen groups and other organizations concerned with housing and community development issues, and will appear at City Clerk office, Capital Area District Library and on the City's website. Any written or oral comments or views of citizens submitted during the thirty (30) day comment period. Copies of the proposed amendment document will be made available upon request from the Development Office of Economic Development and Planning. A summary of comments or views, written and oral, and the response of the City will be included in the final CSPA document.

SECTION 5: CONSOLIDATED ANNUAL PERFORMANCE AND EVALUATION REPORTS (CAPER)

The City of Lansing shall in September of each year make available to citizens a grantee performance report (CAPER), or an equivalent report as may be required by the Department of Housing and Urban Development, which shall contain a report and evaluation of the City's accomplishments for the previous fiscal year based on objectives and the amount of funds projected to be used to benefit low and moderate income persons as stated in the annual CSPA. A summary of citizens' comments shall be incorporated into the CAPER report before its submission to HUD.

A. PUBLIC PARTICIPATION/HEARING PROCESS - CAPER

Notice of the availability of the grantee performance report shall be published as discussed in the Publishing of Notice herein. A summary of citizens' comments or views, written and oral, and the response of the City will be included in the final CSPA document. Citizen's shall be given a period of fifteen (15) days to comment on the report.

SECTION 6: TECHNICAL ASSISTANCE

Technical Assistance shall be provided as much as practicable by the Department of Economic Development and Planning to individuals, organizations, agencies and groups interested in developing proposals for funding through the CSPA planning and budget process. Requests for such assistance shall be submitted in writing. Reasonable levels of assistance shall include informational and training meetings, provision of printed informational material, provision of statistical data, and reference to electronic or other sources of information and referral service. The amount of technical assistance to be provided to any one group or organization shall be at a level determined by the City. The City shall take into consideration the total demand for assistance in determining the amount of assistance able to be provided to any one entity.

SECTION 7: ACCESSIBILITY OF INFORMATION

All documents and information related to the CSPA process and programs including CDBG, HOME and ESG, (*except* personal confidential information such as family income, social security, tax returns, medical, credit data or relocation matters, etc.) are to be made available for citizen review.

Whenever possible information shall be disseminated to members of appropriate advisory organizations at least twenty (20) days before action is expected to be taken by the advisory organizations. When this is not possible, staff shall make every effort to provide information to citizens in a timely manner.

SECTION 8: COMPLAINT PROCESS

It is clearly recognized that good communications are necessary if community development program are to be effectively implemented. The following process is a guide to resolving complaints and disagreements.

When citizens disagree with policies or actions of the City regarding CSPA matters and those disagreements are not able to be resolved with the City staff most directly involved, citizens should express the complaint in writing to involved staff persons with a copy to supervisory staff. If it is necessary to pursue the complaint further, it should be submitted to the Director of the Planning and Neighborhood Development Department in the same written form. If the matter remains unresolved, the written complaint should be submitted to the Law Department. Formal complaints should be made in writing and mailed, e-mailed or delivered to the Department of Planning and Neighborhood Development office.

A written response to complaints received shall, if at all possible and practicable, be prepared and mailed to citizens within fifteen (15) days of the receipt of the complaint in the Development Office of the Department of Economic Development and Planning.

SECTION 9: EFFECT OF CHANGES TO LAW, HUD REQUIREMENTS OR FEDERAL REGULATIONS

The City of Lansing will continue to comply with any and all HUD requirements, including those related to new programs, amendments and changes to regulations, changes pertaining to the Consolidated Plan process, Amendments, CAPER, the Citizen Participation Plan, public comment period and form of public notice. In the event of conflict between this Citizens Participation Plan and new or amended requirements set by HUD or federal law, the new requirements shall supersede this Plan.

In the event HUD allows or provides for a waiver of any requirement of this CPP as allowed by law or regulation, including but not limited to public hearing, public comment, and publication requirements, the Department may elect to exercise said waiver for the

purpose of expediting programs to address emergency situations, including but not limited to the COVID-19 pandemic.