

CITY OF DEARBORN

ECONOMIC DEVELOPMENT DEPARTMENT



Citizen Participation Plan

8/1/2022

City of Dearborn

**US Department of Housing and Urban Development
Community Planning and Development Programs**

**Citizen Participation Plan
(2022 Revision)**

Summary: This Citizen Participation Plan (CPP) provides for and encourages citizens to participate in the development of the City of Dearborn's Community Development Block Grant Consolidated Plan (a planning document that directs the City's use of federal community planning and development funds from the US Department of Housing and Urban Development (HUD)), any substantial amendments to the Consolidated Plan (Con Plan), and Consolidated Annual Performance Reports. Additionally, this CPP encourages citizens to participate in the development of the City's CDBG-DR Disaster Recovery Action Plans received from HUD.

The Con Plan includes the following formula grant programs: the Community Development Block Grant (CDBG) program [24 CFR 570]; the Emergency Solutions Grant (ESG) program [24 CFR 576]; the HOME Investment Partnerships program [24 CFR 92]; and, the Housing Opportunities for Persons with Aids (HOPWA) program [24 CFR 574]. Applications for several other HUD programs [see 24 CFR 91.2b] require a certification that the application is consistent with a HUD-approved Con Plan.

The Dearborn CDBG-DR Action Plan and substantial amendment process under federal public law PL 117-43 will follow the same process as the Con Plan.

Effective Date: The City of Dearborn (City) will fully implement this plan on August 1, 2022. Upon effect, this plan replaces the Citizen Participation Plan adopted May 18, 2020.

For Further Information Contact: Regina Sistrunk, Community Development Coordinator, City of Dearborn, Economic Development Department, 16901 Michigan Avenue, Suite 15, Dearborn, Michigan 48126-2967 or rsistrunk@ci.dearborn.mi.us.

Non-English-speaking residents or individuals with disabilities who require special accommodations, auxiliary aids, or services concerning this CPP may contact

313-943-2195 or refer to the Dearborn Limited English Proficiency Plan. Reasonable advance notice is required.

In event of a local, state, and national natural disaster, existing and new funding may be allocated or re-allocated in an expedited timeframe. The City of Dearborn may streamline the allocation process and reduce delays in accessing grant funds following HUD notices, waivers, award letters or other HUD communication. To achieve this minimum citizen participation requirement, it will be applied per HUD notices, waivers, award letters or other HUD communication to the Con Plan and/or substantially amended Annual Action Plan(s).

Additional Program Modifications in the event of local, state, and national natural disaster may include the following:

- Permits a public comment period of no less than 5 days when citizen participation is required.
- Permits grantees to develop expedited citizen participation procedures and to hold virtual public hearings when necessary for public health reasons.
- Elimination the public services cap.
- Allows states and local governments to reimburse allowable costs of eligible activities regardless of the date the costs were incurred.

New language below will be added to the City of Dearborn Citizen Participation Plan:

- Additionally, this plan encourages citizens to participate in the development of the City's CDBG-Disaster Recovery (DR) action plans and substantial amendments to the CDBG-DR action plans.
- **Addressing Language Barriers - Limited English Proficiency Persons (LEP)**
- The City will take affirmative steps to communicate with people who need services or information in a language other than English. These persons will be referred to as persons with Limited English Proficient (LEP). For the purposes of this document, Federal Community Planning and Development Programs (CPD) consists of; Community Development Block Grant (CDBG), Home Investment Partnership (HOME), and Disaster Recovery (DR).

- Limited English Proficient persons are persons who, as a result of national origin, do not speak English as their primary language and who have limited ability to speak, read, write, or understand. For purpose of the CPD programs, LEP persons are applicants and participants, and parents and family members of applicants and participants.
- The Dearborn Economic Development Department is required to make reasonable efforts to provide language assistance to ensure meaningful access for LEP persons to the City's federal CPD programs and activities. However, HUD recognizes that some City budgets and resources are constrained by contracts and agreements with HUD. These constraints may impose a material burden upon the City.
- Language assistance that the Dearborn Economic and Development might provide to LEP persons includes, but is not limited to:
 1. Oral interpretation services;
 2. Bilingual staff;
 3. Conduct special briefings in another language;
 4. Arrange for interpreter to be present at briefing;
 5. Translate written material that accompanies briefing;
 6. Allow for special staff to assist in briefing families and translating documents;
or
 7. Referrals to community liaisons proficient in the language of LEP persons

Program Year

The Con Plan program year coincides with the City of Dearborn's fiscal year: July 1 through June 30. Planning for an upcoming program year will begin in November.

Public Notices

Public Notices will be published in the official City of Dearborn newspaper which is the Dearborn Free Press and Guide. All notices will include a statement regarding assistance to LEP and disabled individuals.

Public Hearings

General. Con Plan public hearings will be conducted by the Economic Development Department. Public hearings #1 and #2 will take place on a weekday at an accessible Dearborn Administrative Center location. Other public hearings will be held at a time and location suitable to the topic and intended audience. Upon reasonable advance request, bilingual staff will be in attendance.

Persons unable to present their views and comments at the public hearings may do so, in writing, to the Dearborn Economic Development Department, located at 16901 Michigan Avenue, Suite 15, Dearborn, MI 48126. Comments received within ten (10) days of the hearings will be considered timely.

Notice of public hearings will be published not less than ten (10) days prior and will contain sufficient information about the subject of the hearing. A copy of the public notice will be forwarded to the Con Plan e-mail distribution list.

Public Hearing #1. The first public hearing (February/March) will be conducted prior to, or in conjunction with the Notice of Funds Availability and will include, but not be limited to the following topics: performance during the most recently completed one year report period, eligible housing and community development activities, identification of current and projected housing and community development needs, and the funding application process.

Public Hearing #2. The second public hearing (March/April) will be conducted after the deadline for submission of funding applications and will include, but not be limited to the following topics: anticipated community planning and development resources for the coming year (including funds reprogrammed from prior activities, program income, pre-award funding, float funding, and guaranteed loan assistance), proposals for the use of anticipated funds (must identify intended beneficiaries), and a schedule of other Con Plan events.

Notice of Funds Availability

A notice announcing the availability of applications for City community planning and development funds will be published in the official City Newspaper (may be a separate notice or may be included in the notice for Public Hearing #1). A copy of the public notice will be forwarded to the Con Plan e-mail distribution list.

Proposed Con Plan or DR Action Plan

A summary of the proposed Con Plan or DR Action Plan, which describes the contents and purpose of the plan, and an announcement of the Plan's availability for review and comment, will be published in the official City Newspaper. A copy of the public notice will be forwarded to the Con Plan e-mail distribution list.

The proposed Con Plan or DR Action Plan will be available, during the published 30-day comment period, at the Economic Development Department or electronically upon request. Proposed five-year Con Plans will also be forwarded to the US Department of Housing and Urban Development, the State of Michigan and the County of Wayne.

Citizen Comments. The City of Dearborn will consider any comments or views of citizens received in writing (or orally at the public hearings) in preparing the final

Con Plan or DR Action Plan. A summary of these comments or views, and a summary of any comments or views not accepted and the reasons therefore, will be attached to the final Con Plan or DR Action Plan.

Free Copies. Not less than three (3) free copies of the proposed Con Plan or DR Action Plan will be made available to Dearborn citizens or groups representing Dearborn citizens upon request. Written requests for plan copies should include the name and address of the resident or group, identification of the residents or interest group represented, and the intended use of the plan copy. (Disabled individuals may request to receive materials in an accessible format.)

Con Plan Amendments

The Con Plan is the long-term (five-years) housing and community development plan. The DR Action Plan is the disaster recovery action plan/strategy that addresses unmet recovery needs and mitigation projects/activities related to the 2021 flood disaster. The Con Plan includes a Needs Assessment, a Strategic Plan, and Annual Action Plans. The Annual Action Plan is the City's application for HUD community planning and development funds and allocates those annual resources to specific activities/projects.

HUD Regulation: **24 CFR 91.105** (c) (2) requires the citizen participation plan to provide residents with reasonable notice and an opportunity to comment on substantial amendments to the Con plan.

The City will amend its approved Con Plan or DR Action Plan whenever, between annual submissions, it makes one of the following decisions: 1) to make a change in its allocation priorities (Strategic Plan Priority Needs Summary Table) or a change in its project selection process; 2) to carry out an activity not previously described in its Action Plans; or, 3) to change the purpose, scope (activity budget), location (community or neighborhood), or beneficiaries (ex. low income, disabled, elderly) of an activity. All amendments will be submitted to HUD at the end of each program year.

For the purposes of this Citizen Participation Plan, amendments to the Con Plan are divided into three categories: substantial amendments, moderate amendments, and minor amendments.

Substantial Amendments. The City will consider the following changes to be substantial amendments to the Con Plan: 1) changes to Priority Need Levels as identified in the Strategic Plan Priority Needs Table; 2) a change in the project selection process, as described in the Con Plan; 3) the addition of a new activity not previously described in its Action Plans; 4) the deletion of a previously approved activity; 5) an increase to an activity's total budget in an amount that exceeds the greater of 20% or \$100,000; or, 6) a change in the purpose, location or beneficiaries

of an approved activity whose pro-rata budget share exceeds the greater of 20% or \$100,000. [For example: The service area of a \$250,000 activity is doubled, decreasing the benefit to the approved service area by 50%, or \$125,000. This change would, therefore, be considered a substantial amendment.]

A summary of the proposed substantial amendment will be published in the official City Newspaper and will establish a 30-day public comment period. A copy of the public notice will be forwarded to the Con Plan e-mail distribution list. Questions (including requests to review supporting documentation) or written comments regarding the proposed amendment will be directed to the Economic Development Department. Comments received, if any, will be considered in the preparation of the amendment. A summary of these comments, and a summary of any comments or views not accepted and the reasons therefore, will be attached to the Con Plan Amendment.

Moderate Amendments. The City will consider the following changes to be moderate amendments to the Con Plan: 1) an increase to an activity's total budget in an amount that exceeds the greater of 10% or \$50,000 but no more than the greater of 20% or \$100,000; or, 2) a change in the purpose, location or beneficiaries of an approved activity whose pro-rata budget share exceeds the greater of 10% or \$50,000 but does not exceed the greater of 20% or \$100,000. [Note: Moderate amendments to an activity that cumulatively exceed the greatest of 20% or \$100,000 will be considered substantial amendments.]

A summary of the proposed moderate amendment will be published in the official City Newspaper and will establish not less than a 10-day public comment period. A copy of the public notice will be forwarded to the Con Plan e-mail distribution list. Questions (including requests to review supporting documentation) or written comments regarding the proposed amendment will be directed to the Economic and Community Development Department. Comments received, if any, will be considered in the preparation of the amendment.

Minor Amendments. The City will consider the following changes to be minor amendments to the Con Plan: 1) an increase to an activity's total budget in an amount that does not exceed the greater of 10% or \$50,000; or, 2) a change in the purpose, location or beneficiaries of an approved activity whose pro-rata budget share does not exceed the greater of 10% or \$50,000. [Note: Minor amendments to an activity that cumulatively exceed the greatest of 10% or \$50,000 will be considered moderate amendments.]

DR Action Plan Amendments

DR Substantial Amendments. For the purposes of the CDBG DR Action Plan, The City will consider the following changes to be substantial amendments to the DR Action Plan: 1) changes to Priority Need Levels as identified in the DR Action Plan and/or Needs Assessment; 2) a change in the project selection process, as described in

the DR Action Plan; 3) the addition of a new activity not previously described in its DR Action Plans; 4) the deletion of a previously approved activity; 5) an increase to an activity's total budget in an amount that exceeds the greater of 50% or \$2,000,000; or, 6) a change in the purpose, location or beneficiaries of an approved activity whose pro-rata budget share exceeds the greater of 50% or \$2,000,000.

DR Moderate Amendments. The City will consider the following changes to be moderate amendments to the DR Action Plan: 1) an increase to an activity's total budget in an amount that exceeds the greater of 25% or \$1,000,000 or, 2) a change in the purpose, location or beneficiaries of an approved activity whose pro-rata budget share exceeds the greater of 25% or \$1,000,000 [Note: Moderate amendments to an activity that cumulatively exceed the greatest of 25% or \$1,000,000 will be considered substantial amendments.]

A summary and public notice of the proposed moderate amendment will be posted in the Dearborn Administrative Center and three (3) Dearborn libraries for citizen's review. A copy of the public notice will be forwarded to the Con Plan e-mail distribution list. Questions (including requests to review supporting documentation) or written comments regarding the proposed amendment will be directed to the Economic Development Department. Comments received, if any, will be considered in the preparation of the amendment.

DR Minor Amendments. The City will consider the following changes to be minor amendments to the DR Action Plan: 1) an increase to an activity's total budget in an amount that does not exceed the greater of 15% or \$750,000; or, 2) a change in the purpose, location or beneficiaries of an approved activity whose pro-rata budget share does not exceed the greater of 15% or \$750,000. [Note: Minor amendments to an activity that cumulatively exceed the greatest of 25% or \$1,000,000 will be considered moderate amendments.]

A summary of the proposed minor amendment will be available for public review (without public notice) in the Economic Development Department. Refer to "Documents Available," later in this plan.

Annual Performance Reports

Prior to its submission to the US Department of Housing and Urban Development, the City of Dearborn's Con Plan performance report will be made available, via publication in the official City newspaper, for a 15-day review and comment period. A copy of the public notice will be forwarded to the Con Plan e-mail distribution list.

The performance report will be available for review at the Dearborn Economic Development Department and electronically upon request.

Citizen Comments. The City of Dearborn will consider any comments or views of citizens received in writing in preparing the performance report. A summary of these comments or views will be attached to the performance report.

Guaranteed Loan Funds

The City of Dearborn is eligible to apply for loan guarantee assistance (in an amount not to exceed five times its annual CDBG entitlement allocation) under Subpart M of 24 CFR Part 570. An application for loan guarantee assistance may be submitted simultaneously with the City's annual grant submission (Annual Action Plan) or as a separate assistance application.

Proposed applications for guaranteed loan assistance will be the subject of a separate Public Hearing before the City's governing body. Information made available to affected citizens will include: a description of the activities to be undertaken, the national objective to be met by each activity, the amount of any program income expected to be generated, the amount of guaranteed loan funds to be used, the proposed term of the guaranteed loan, proposed resources (including the pledge of future grant funds) for loan repayment, and whether the proposed activities are likely to result in displacement and plans to minimize displacement.

Notice of the public hearing will be published not less than ten (10) days prior and will contain sufficient information about the subject of the hearing. A copy of the public notice will be forwarded to the Con Plan e-mail distribution list.

Float Funding

The City of Dearborn may, from time to time, use undisbursed funds in its CDBG line of credit that are budgeted for one or more other activities that do not need the funds immediately (24 CFR 570.301b). Each activity funded using this "float" must meet all of the same requirements that apply to CDBG-assisted activities generally and be expected to produce program income in an amount not less than the amount of float so used. The expected time between the obligation of assistance for a float funded activity and the receipt of program income to fund the activity must not exceed 2.5 years.

The proposed use of float funding will be the subject of a Public Hearing before the City's governing body. (The hearing may be conducted concurrently with a public hearing regarding loan guarantee assistance if the assistance is for the same activity.) Information made available to affected citizens will include: a description of the activities to be undertaken, the national objective to be met by each activity, the amount of float funding to be used, and the amount, sources and schedule of program income expected to be generated. Information must also be provided that identifies the actions that will be taken if the activity fails to produce sufficient income in a timely manner.

Notice of the public hearing will be published not less than ten (10) days prior and will contain sufficient information about the subject of the hearing. A copy of the public notice will be forwarded to the Con Plan e-mail distribution list.

E-Mail Distribution List

The Con Plan e-mail distribution list includes representatives of the State of Michigan, the County of Wayne, adjacent local governments, the Dearborn Housing Commission, CDBG Sub-recipients, local non-profit organizations, neighborhood associations representing low and moderate income neighborhoods, and public and private agencies that provide assisted housing, health services and social services (including those focusing on services to children, elderly persons, persons with disabilities, homeless persons and persons with HIV/AIDS and their families).

The Con Plan e-mail distribution list is maintained as an open list. Private citizens, as well as public and private agencies representing Dearborn citizens will be added to or removed from the mailing list upon request.

[You may request to be added/deleted from the Con Plan e-mail distribution list via e-mail to: rsistrunk@ci.dearborn.mi.us. Please include your name, title, company/agency name, address, phone, and email address.]

Technical Assistance

Groups representing low-and-moderate income Dearborn residents may request assistance in developing proposals for funding under any of the programs covered by the Con Plan or DR Action Plan. Specifically, Economic Development Department staff with available resources (time and expertise) will provide assistance concerning project eligibility, project proposal and implementation requirements, and internal controls. Technical assistance does not include the provision of funds.

Displacement

All of the City of Dearborn's Con Plan activities are designed to eliminate (or minimize) the occurrence of displacement. Program guidelines and limitations are structured so that temporary displacement is unlikely.

Tenants in occupied rental properties are made aware of their rights with respect to displacement and relocation. Property owners are made aware of their rights and responsibilities: property owners must assume the financial responsibility for the displacement and relocation of their tenants.

If an *involuntary* displacement should occur, it is the City of Dearborn's policy to provide housing referral assistance and, if required, make relocation payments in accordance with local, state and federal law.

Complaints

The Economic Development Department will provide a timely (within 15 working days where practicable), written response to written citizen complaints concerning the Con Plan, Dr Action Plan, amendments and performance reports. Economic Development Department complaint resolution may be appealed to the City Administration or to the US Department of Housing and Urban Development.

Documents Available

The following public documents are available at the Economic Development Department, 16901 Michigan Avenue, Suite 15, Dearborn, MI 48126 during regular business hours: the Con Plan regulations and guidebook; the most recent, HUD-Approved Con Plan; Con Plan amendments; this Citizen Participation Plan; and, performance reports covering the past five-year period.

All public documents for the DR Action Plan are available on the City's website at <https://cityofdearborn.org/disaster-recovery> or you can request a hard copy of the document in person at the Dearborn Administrative Center (DAC) located at 16901 Michigan Avenue, Dearborn MI 48126 or via email at DearbornDR@ci.dearborn.mi.us