

# CITIZEN PARTICIPATION PLAN

Superior, Wisconsin

*“An official plan for citizen involvement in housing and community development programs.”*

## **A. Background: Community Development Block Grant Program**

The Community Development Block Grant (CDBG) Program is authorized under Title I of the Housing and Community Development Act of 1974, as amended. The CDBG program was enacted in 1974 under the Housing and Community Development Act (HCDA).

The primary objective of Title I of the Housing and Community Development Act of 1974, as amended, is the development of viable urban communities. These communities are achieved by providing the following, principally for persons of low and moderate income:

- Decent housing
- Suitable living environment
- Economic opportunities

Based on a grant funding formula, the City of Superior is the direct recipient of Community Development Block Grant (CDBG) funds distributed by the United States Department of Housing and Urban Development (HUD). As an entitlement community, the City receives an annual allocation from HUD which is managed through the Consolidated Planning process. The Consolidated Plan is a tool developed in consultation with public and private agencies to determine strategies to achieve the three goals listed above by identifying its housing and community development needs.

Section 107 of the Cranston-Gonzalez National Affordable Housing Act and its implementing regulations at 24 CFR Part 91 require jurisdictions to implement a citizen participation process as a prelude to the allocation and expenditure of funds for the CDBG Program. These requirements are also contained in section 104(a)(2) of the Housing and Community Development Act of 1974 for CDBG grantees. The citizen participation plan is a component of the consolidated plan required pursuant to 24 CFR 91 and shall be updated every five years as a prelude to the Consolidated Plan. Citizens are encouraged to participate in the process as described below.

## **B. Introduction: The Citizen Participation Plan**

Superior is required by HUD regulations to have a detailed Citizen Participation Plan, which contains the City's policies and procedures for public involvement in the Consolidated Plan process and the use of CDBG, HOME and ESG money. The Consolidated Plan process includes the development of standard documents known as the annual Action Plan, the Citizen Participation Plan, the Consolidated Annual Performance and Evaluation Report (CAPER), the Analysis to the Impediments of Fair Housing Choice (AI)/Assessment of Fair Housing (AFH) and any substantial amendments.

Superior supports participation from public and private agencies and organizations, and encourages citizen participation, emphasizing involvement by low and moderate income people, especially those living in low to moderate income neighborhoods (low to moderate income neighborhoods have incomes less than eighty percent of the median income level according to the most recent census data). Superior will also take action to encourage participation of minorities, residents who do not speak English and people with disabilities. Genuine involvement by citizens will take place at all stages of the process, including: identifying needs; setting priorities among these needs; funding activities; and overseeing program execution.

This Citizen Participation Plan is made available to the public on the City's website and copies are available in the Department of Planning and Development.

### **C. Accessibility:**

Efforts will be made to encourage low and moderate income people, people of various races, persons who do not speak English, people who are disabled, people who are obtaining housing assistance and past recipients of money to attend the CDBG Advisory Board Meetings and the Common Council's Public Hearings.

Public hearings will be held only after there has been adequate notice as described in the Public Notice portion of this Citizen Participation Plan.

All public hearings will be held at locations accessible to people with disabilities and provisions will be made for people with disabilities when requests are made. Translators will be provided for people who do not speak English when requests are made according to City policy.

Pursuant to the Americans with Disabilities Act of 1990, if you are in need of an accommodation to participate in the public meeting process, please contact the City Clerk's Office at (715) 395-7200 before 4:30 pm on the day prior to the scheduled meeting. The City will try to accommodate any request depending on the amount of notice we receive. TTY 715-395-7521.

Notices will be posted at all public review locations. Locations include: Government Center, Douglas County Courthouse, Superior Public Library, Superior Housing Authority and Northwest Wisconsin Community Services Agency. It will also be displayed on the City of Superior's web site.

### **D. Access to records and technical assistance:**

The City of Superior will provide the public with reasonable and timely access to information and records relating to the data or content of standard documents concerning the acquisition and expenditure of federal funds through the CDBG Program.

To encourage public participation, copies of current standard documents and other relevant information will be available for viewing at public review locations and on the City's website. Additional copies will be provided to the public upon request according to the City of Superior's

current policy. All standard documents will be available for seven years in the Department of Planning and Development. Standard documents include:

- The Annual Action Plan
- The Consolidated Plan
- Any Substantial Amendments
- Consolidated Annual Performance and Evaluation Report
- The Analysis of Impediments to Fair Housing Choice/Assessment of Fair Housing
- The Citizen Participation Plan

City staff will work with organizations and individuals representative of low and moderate- income people who are interested in submitting comments on standard documents at a public hearing or to submit a proposal to obtain funding for an activity. All potential applicants for funding are encouraged to contact City staff for technical assistance before completing a proposal form.

**E. Anti-displacement:**

The City of Superior intends to minimize the extent to which low and moderate income people will have to leave their homes as a result of the use of these federal dollars (called "displacement"). An anti-displacement plan is on file and describes how citizens are compensated who are actually displaced as a result of the use of these funds, specifying the type and amount of compensation.

**F. Public Notice and Comment Period:**

Public hearings are required in order to obtain the public’s views and to provide the public with the City's responses to public questions and proposals. Public Notices will be issued for the following events and actions with a comment period provided:

Type of Event or Action	Comment Period and Availability of Documents
Citizen Participation Plan (CPP) Public Hearing	30 days
Analysis of Impediments to Fair Housing Choice (AI)/Assessment of Fair Housing(AFH) Public Hearing	30 days
Consolidated Plan Public Hearing	30 days
Action Plan Public Hearing	30 days
Substantial Amendments for CPP, AI, AFH, Consolidated Plan, Action Plan Public Hearing	30 days*
Consolidated Annual Performance and Evaluation Report (CAPER) Public Hearing	30 days
Housing and Community Needs Public Hearing	30 days
Fair Housing Choice Public Hearing	30 days

**\*In the event of disaster/emergency events, a 5-day notice/comment period of a proposed change/amendment may be provided as allowed under a HUD waiver.**

Public notices will be posted at all public review locations. Locations include: Government Center, Superior Public Library, Catholic Community Services, Superior Housing Authority and Northwest Wisconsin Community Services Agency. The notice will also be displayed on the City of Superior's web site. Before conducting a public hearing on the Consolidated Plan and the AI/AFH, a summary describing the content and purpose of the documents will be published in the local newspaper.

The Consolidated Annual Performance and Evaluation Report will be available for public view and comment for a minimum of fifteen days before submittal to HUD.

Notices will be distributed to any person or organization requesting to be on the CDBG mailing list as well as past recipients of funds.

### **G. Public Hearings**

Superior holds various public hearings each year to obtain residents' opinions regarding needs, priorities and expenditures. In order to encourage public involvement, meetings of the CDBG Advisory Board and the Common Council are held in accessible places. To ensure that public hearings are orderly, each public hearing will be conducted in accordance with Roberts Rules of Order. **Virtual or remote access meetings will be allowed per City resolution and/or as provided under a HUD waiver.** Public hearings will be held by the Common Council.

Public hearings will be held as follows:

- To approve or amend the Citizen Participation Plan
- During the development, approval or to amend the Consolidated Plan and the Analysis of Impediments to Fair Housing Choice/Assessment of Fair Housing
- To solicit comments and approve an Annual Action Plan
- To solicit comments and approve the Consolidated Annual Performance and Evaluation Report
- Before action is taken on any substantial amendments
- To solicit comments on Superior's housing and community development needs
- To solicit comments regarding fair housing choice in Superior.

These hearings address housing and community development needs, development of proposed activities and review of program performance. The City will consider any comments or views of citizens in writing or orally before and at public hearings.

Accountability and responsiveness to the public is of primary importance to the Citizen Participation process. In that spirit and in compliance with the terms of the law, the City of Superior will respond to proposals, comments and questions within a reasonable time from the date of the public hearing. A summary of these comments or views and those not accepted, and the reasons therefore, will be attached to the Substantial Amendment, Annual Action Plan,

Consolidated Plan, Consolidated Annual Performance Report and Analysis of Impediments to Fair Housing Choice/Assessment of Fair Housing as applicable.

**H. Revisions and Substantial Amendments:**

The Consolidated Plan and Annual Action Plan will be amended anytime there is:

- A substantial amendment in allocation priorities or method of distribution of funds;
- A change in the use of money to an activity not described in the Annual Action Plan, or;
- A change in the purpose, location, scope or beneficiaries of an activity.

Substantial Amendments
A change in the use of money to an activity not included in the Annual Action Plan.
A change in the use of CDBG money from one activity to another activity.
A significant change in the primary purpose of an activity; for example, a change in a construction project from housing to commercial.
A significant change in the location of an activity; for example from inside to outside the target area.
A significant change in the type or characteristics of persons benefiting from an activity (such as household income level, size, race/ethnicity).
A change in the scope or budget of an activity such that there is a 50% or more increase in the amount of money allocated to the activity for projects with initial budgets of \$50,000 or less, or 35% for budgets between \$50,000 and \$100,000, and 25% for all other project budgets.

The public will be notified whenever there is a Substantial Amendment and the public notice and hearing process will be adhered to as described in this plan to allow for input from citizens, private and public agencies and organizations and other interested parties. All comments will be noted in the amendment and Consolidated Annual Performance and Evaluation Report.

The Planning and Port Director may administratively approve non-substantial or minor amendments to the Action Plan. Generally, fund transfers between activities will occur only within that subrecipient’s allocation of funds and not between subrecipients. All budget adjustments will require an amendment to the budget included in the subrecipient agreement.

Revisions and amendments to the Analysis of Impediments to Fair Housing Choice (AI)/Assessment of Fair Housing (AFH) may occur when there is a material change in circumstances in Superior that affects the information on which the AI/AFH is based, to the extent that the analysis, the fair housing contributing factors, or the priorities and goals of the AI/AFH no longer reflect the actual circumstances. For example: a sudden large increase in population. Revisions and amendments to the AI/AFH will follow the public notice and hearing process to allow for citizen, private and public agencies and organizations and other interested parties the opportunity to provide comment on the revisions or amendments. Comments will be included in the amendment and the Consolidated Annual Performance and Evaluation Report.

## **I. Disaster/Emergency Events:**

It may be necessary to expedite substantial amendments to the Consolidated Plan, Action Plan and Citizen Participation Plan in the event of a declared disaster or emergency. There are three types of disasters/emergency events that may necessitate an expedited substantial amendment including (1) Man-Made disasters, (2) Natural disasters, and (3) Terrorism. Mad-made disasters can include chemical spills, mass rioting, power outages, plant explosions, etc. Natural disasters can include earthquakes, tornadoes, wild fires, flooding and public health issues such as wide-spread disease such as the coronavirus disease. Terrorism events include bomb threats, biochemical attacks, or cyber-attacks like hacking, phishing, and virus distribution, etc.

These expedited substantial amendments may include funding new activities and /or the reprogramming of funds including canceling activities to meet needs resulting from a declared disaster or emergency. Therefore, the City of Superior may utilize CDBG funds to meet these needs with a 5-day public comment period instead of a 30-day public comment period, which is otherwise required for substantial amendments.

## **J. Complaint Procedures:**

Written complaints from the public regarding the Consolidated Plan, Analysis of Impediments to Fair Housing Choice/Assessment of Fair Housing, Consolidated Annual Performance and Evaluation Report, Action Plan and amendments and revisions of such plans will receive a written reply from the City within 15 working days of its receipt. Staff will inform the complainant of their recourse to file a grievance with the CDBG Advisory Board or the Department of Housing and Urban Development. Complaints must be mailed to: Department of Planning and Development, Suite 210, 1316 North 14<sup>th</sup> Street, Superior, WI 54880.

## **K. Amending the Citizen Participation Plan:**

This Citizen Participation Plan may be changed only after the public has been notified of the proposed modifications and provided that the public has had a reasonable opportunity for review and comment.

## **L. CDBG Advisory Board:**

The Common Council created the CDBG Advisory Board to encourage active participation by low and moderate income people. The CDBG Advisory Board membership will be comprised of individuals representing low income people and/or organizations that serve low income people.

The CDBG Advisory Board is a five-member body that contributes to public participation by recommending the amount of CDBG monies to be allocated for public service activities. All CDBG Advisory Board meetings are open to the public. The Department of Planning and

Development will establish the agenda of CDBG Advisory Board meetings, in cooperation with the Board Chair.

**M. Conclusion:**

The Citizen Participation Plan, as adopted, improves the public’s awareness of, and participation in, the various HUD funded housing and community development programs implemented by the City of Superior. The effectiveness of this Plan will be evaluated every five years with amendments made as necessary.

Prepared by:  
Department of Planning and Development  
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