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Res. No. _____ - 19 - 20. By Alderpersons Donohue and Bohren.
October 21, 2019.

A RESOLUTION adopting a Citizen Participation Plan which is required when funds are acquired from the U.S. Department of Housing and Urban Development, Community Development Block Grant Program.

WHEREAS, the U.S. Department of Housing and Urban Development requires that recipients of Community Development Block Grant monies have in place a Citizen Participation Plan (CPP); and

WHEREAS, the CPP shall encourage citizen participation (especially by persons of low to moderate income), provide citizens reasonable and timely access to local meetings and information, provide for technical assistance, provide for public hearings, and provide for complaint procedures; and

WHEREAS, the City of Sheboygan has prepared and reviewed the CPP.

NOW, THEREFORE, BE IT RESOLVED: That the City of Sheboygan Common Council officially adopts the CPP, a copy of which is attached hereto.

*Finance
Personnel .*

I HEREBY CERTIFY that the foregoing Resolution was duly passed by the Common Council of the City of Sheboygan, Wisconsin, on the _____ day of _____, 20____.

Dated _____ 20____. _____, City Clerk

Approved _____ 20____. _____, Mayor

**City of Sheboygan
Community Development Block Grant Program**

Citizen Participation Plan

A. Background: Community Development Block Grant (CDBG) Program

The Community Development Block Grant (CDBG) program was established by Congress in 1974 with the passage of the Housing and Community Development Act. The program provides funding for three (3) broad goals:

- 1) Decent housing;
- 2) A suitable living environment; and
- 3) Economic opportunities

These three (3) broad goals are primarily oriented to serve the needs of low and moderate income persons living within the city.

The city receives a regular annual allocation of CDBG funds from the U.S. Department of Housing and Urban Development (HUD). The CDBG funds are managed through the Consolidated Planning process, which identifies housing and community development needs, and identifies strategies to meet those needs. The process encourages citizens to participate in the Consolidated Planning process as outlined below.

B. Introduction: Citizen Participation Plan

The Citizen Participation Plan serves as the foundation for developing stronger citizen relationships throughout the City of Sheboygan. The City supports and encourages participation of citizens, community groups, and other interested agencies in both the development and evaluation of programs and activities funded with CDBG and included in the Consolidated Plan. Increased citizen and community involvement is an important component of understanding the needs in the City and developing appropriate strategies to address those needs.

The City of Sheboygan has adopted this Citizen Participation Plan in compliance with Section 104 (a)(3) of the Housing and Community Development Act of 1974 as well as 24 CFR 91.105, the federal regulations governing public participation in the Consolidated Planning process.

Copies of the Citizen Participation Plan are available in the City Development Department and on the City website.

C. CDBG Policy and Administrative Oversight

The City of Sheboygan's Department of City Development will provide planning and administrative oversight of the CDBG funded activities. Policy oversights including, but not limited to, approval of all housing loans, economic development project participation, and other financial assistance.

D. Public Hearings

Two (2) public hearings will be held each Program Year to provide opportunities for public participation at different stages of the CDBG Program Year and planning process.

- 1) The Annual Action Plan – Needs Assessment Public Hearing is held to identify community development needs and programs. The city utilizes the feedback and comments from the public hearing in determining CDBG funding recommendations for the next year.
- 2) The Annual Action Plan – Adoption Public Hearing corresponds with the draft publication of the CDBG Annual Action Plan which outlines the proposed activities for the upcoming Program year. Following the hearing, the city will allow at least 30 days to receive citizen comments before submitting the Annual Action Plan to the U.S. Department of Housing and Urban Development.

Notices of public hearings are published in the local newspaper (Sheboygan Press), on the City of Sheboygan webpage, and various other media outlets.

E. Public Comment Periods

The Consolidated Annual Performance & Evaluation Report (CAPER) summarizes the activities undertaken the previous Program Year. A notice is published in the local newspaper notifying the public of the availability of the draft CAPER report and to provide comments which will be included in the submission of the final report. The city will allow at least 30 days to receive citizen comments from the date of publication of the Notice.

Notices of public comment periods are published in the local newspaper (Sheboygan Press), on the City of Sheboygan's web page, posted at a public area at City Hall, and various other media outlets.

F. Consolidated Plan-Public Hearing/Comment Period

Citizens are encouraged to participate in the public hearings and comment periods that occur as part of the development and adoption of the Five Year Consolidated Plan for the CDBG Program. The development of the Consolidated Plan includes identification of long-term housing and community development related strategies. The draft of the Consolidated Plan will be available on the City of Sheboygan web page and in hard copy at the Department of City Development.

The development and adoption of the Five Year Consolidated Plan will follow requirements of Section D. Public Hearings.

G. Accessibility

All city residents, namely persons of low-and-moderate income, persons with disabilities, persons with limited English-speaking ability and persons of racial minority are encouraged to contribute input regarding CDBG-funded activities. No person shall be excluded from participation in the City of Sheboygan CDBG programs on the grounds of race, color, national origin/ancestry, sex, sexual orientation, disability, gender identity, age, religion, marital status, familial status, lawful sources of income, or domestic abuse, sexual assault and stalking victims.

To encourage equal access in participation for persons with disabilities, all CDBG-related hearings and meetings are held at City Hall which is handicapped accessible. With advanced notice, the City will also provide interpreters for speaking and hearing impaired persons.

H. Access to Records & Technical Assistance

The Department of City Development shall provide citizens, agencies, and other interested parties with access to information and records related to the city's CDBG Program, including reports, policies, and CDBG funded activities for the last seven (7) years. A printed copy of the current Consolidated Plan, Annual Action Plan and CAPER will be available to the public in the Department of City Development, 828 Center Avenue, 2nd Floor, Sheboygan, WI 53081. Electronic versions of both reports will be available on the City's web page.

Staff shall provide technical assistance to organizations that serve low and moderate income persons in developing their CDBG subrecipient applications. In addition, an organization that receives CDBG funding will receive technical assistance in the implementation and reporting of their activity to insure compliance with HUD regulations.

All citizens and/or local agency representatives are encouraged to contact staff with questions about both program guidelines inquiries and general community developments in the City.

I. Amendments

The City will amend its approved Consolidated Plan whenever it makes one of the following decisions:

- To make a substantial amendment in allocation priorities or a substantial amendment to the method of distributing funds;
- To carry out an activity not previously described in the Action Plan, using funds from any program covered by the Consolidated Plan (including program income); or
- To substantially amend purpose, scope, location or beneficiary of an activity.
- To amend or revise the Citizen Participation Plan

Substantial amendment is defined as a change in a planned or actual activity proposed after the official adoption of the Consolidated Plan/Annual Action Plan that affects 10% or more of the City's current annual allocation of CDBG funds. Substantial amendments to the approved Consolidated Plan must be authorized by the Common Council, and will be made public by postings and public notices in the newspaper. The city will receive and consider comments on the substantial amendment to the Consolidated Plan/Annual Action Plan for 30 days before implementing those amendments.

J. Anti-Displacement

It is the policy of the City of Sheboygan to minimize the displacement of individuals and businesses which may result from CDBG activities. In cases where displacement is absolutely necessary, relocation benefits will be paid in accord with the Uniform Relocation Act, other applicable federal regulations, and Chapter 32 of the Wisconsin State Statutes.

K. Objections to CDBG Documents

Citizens may provide comments regarding the Consolidated Plan, Annual Plan, substantial amendments, the Consolidated Annual Performance & Evaluation Report (CAPER) or other CDBG-related matter at any time during the Program Year. Comments must include identification of unmet requirements and relevant supporting data and will be considered on the following grounds:

- 1) Stated needs and objectives are inconsistent with available and reliable data
- 2) Stated projects are inappropriate for meeting needs and approved objectives

3) Consolidated Plan elements do not comply with federal regulations for the CDBG Program

Comments must be submitted by email or in written form to the Department of City Development, 828 Center Avenue, 2nd Floor, Sheboygan, WI 53081. Upon receipt, the Director of Planning and Development shall respond in writing, where practicable, within 15 days.

L. Complaints

Any participant of a specific CDBG funded activity or program may file a complaint in writing with the Director of Planning and Development within 30 days of the action that gave rise to the complaint. The complaint should include the basis for which the participant believes that an action is not in compliance with CDBG regulations and/or the City's CDBG Program policies and guidelines. The Director of Planning and Development shall respond, where practicable, within 15 days. Upon receiving the response of the Director of Planning and Development, the program participant may request the city to review the matter. The program participant must submit the request by email or in writing within 30 days of the date of the response and the matter will be brought before the city at the next available meeting.