

# **CITIZEN PARTICIPATION PLAN**

*For*

## **Community Development, Housing, Homelessness and Special Needs**

City of Springfield, Massachusetts

May 2015

### **Amendment #2 5/26/2020**

The U.S. Department of Housing and Urban Development (HUD) has provided guidance via a memorandum dated April 10, 2020 (available at <https://files.hudexchange.info/resources/documents/Suspensions-and-Waivers-to-Facilitate-Use-of-HOME-Assisted-TBRA-COVID-19.pdf>) permitting HOME participating jurisdictions, such as the City of Springfield, to seek certain regulatory waivers to enable the jurisdiction to use HOME tenant-based rental assistance (TBRA) funds to facilitate urgent housing assistance to the communities and families experiencing financial hardship due to the Covid-19 pandemic. Springfield requested and received authorization to allow it to amend its Citizen Participation Plan to reduce the required public comment period to 5 days when the City is seeking an amendment to its Consolidated Plan or Annual Action Plan.

This Amendment #2 to the City's Public Participation Plan provides that, for creating plan amendments relating to the HOME Investment Partnerships Program, the City shall provide a public comment period of not less than 5 days, and may use may use a virtual public hearing when necessary for public health reasons.

This amendment was posted to the City's website on May 26, 2020, and a public hearing was held May 29, 2020 at 1:00 pm on Facebook Live at <https://www.facebook.com/CityofSpringfieldMA>.

## **Amendment #1 4/17/2020**

The Coronavirus Aid, Relief and Economic Security Act (CARES Act) (Public Law 116-136) has made available supplemental funding, flexibilities, and waivers in response to COVID-19. The U.S. Department of Housing and Urban Development (HUD) has allocated supplemental HOPWA, ESG, and CDBG funding in response to COVID-19. The supplemental awards are to prevent, prepare for, or respond to coronavirus. The CARES Act also provides CDBG grantees with flexibilities for 2019 and 2020 CDBG Grant Amendments for coronavirus response. The Citizen Participation requirements have been waived or changed by HUD as follows:

**ESG** – The funds are not subject to the consultation and citizen participation requirements that otherwise apply to the Emergency Solutions Grants, however each recipient must publish how its allocation has and will be used, at a minimum, on the Internet at the appropriate Government web site or through other electronic media.

**HOPWA and CDBG** – The public comment period is reduced to not less than 5 days, grantees may use virtual public hearing when necessary for public health reasons.

**Citizen Participation for Substantial Amendments to Action Plans 2019 and 2020 in response to COVID-19:**

ESG:

- Publication on the City’s website.
- Notice of publication on the City’s social media platforms, including Facebook and Twitter.

HOPWA and CDBG: The substantial amendment will be published as follows:

- Publication on the City’s website at [www.springfield-ma.gov/planning/index.php?id=community-development](http://www.springfield-ma.gov/planning/index.php?id=community-development)
- Notice of publication on the City’s social media platforms, including Facebook and Twitter.
- A comment period for the required five days
- A virtual Facebook live hearing during the five-day comment period at <https://www.facebook.com/CityofSpringfieldMA>. The public throughout the duration of the hearing can submit comments at the Facebook site. Spanish-speaking staff will be present and available for translation at the hearing. Accommodations for disabilities will be provided upon request.
- Additional submission of comments will be allowed as follows:
  - Written comments mailed to the Office of Community Development, 1600 East Columbus Avenue, Springfield, MA 01103
  - Via email to [cbuono@springfieldcityhall.com](mailto:cbuono@springfieldcityhall.com)
  - By telephone contacting 311, the City of Springfield’s main source of government information and non-emergency services, or the Office of Community Development at (413) 787-6082.

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**Introduction**

Pursuant to the citizen participation requirements of 24 CFR Section 91.105, the City of Springfield’s Development Services Division sets forth the following Citizen Participation Plan as it relates to the consolidated planning process for housing and community development programs funded by the Department of Housing and Urban Development (HUD). The Citizen Participation Plan presents the City’s plan for providing and encouraging all citizens, particularly low- and moderate- income citizens, to participate in the development and adoption of four components of the consolidated planning process:

- 1.) The Citizen Participation Plan
- 2.) The Five-Year Consolidated Plan
- 3.) Substantial Amendments to the Consolidated Plan
- 4.) The Annual Action Plan
- 5.) The Consolidated Annual Performance and Evaluation Report (CAPER)

### **Lead Agency and Administering Agencies**

The Development Services Division is the lead agency responsible for administering the programs covered by the Consolidated Plan, and the Annual Action Plan or any other HUD related documents. This Division is made up of the following departments: Community Development (OCD), Planning and Economic Development (OPED), Housing, Code Enforcement and Neighborhood Services. The Division administers funds provided to other City Departments to carry out the plan, which include Parks and Recreation, Public Works, Elder Affairs, and Health and Human Services. The Division also administers grant funding to various agencies and nonprofit organizations to carry out the plan. The OCD is the lead agency responsible for the Consolidated Planning process and the administration of the Community Development Block Grant Program (CDBG), the Home Investment Partnerships Program (HOME), the Emergency Solutions Grant Program (ESG), and the Housing Opportunities for Persons with Aids Program (HOPWA). All of these funds are collectively known as Community Planning and Development (CPD) funds.

In accordance with the regulations, the minimum annual number of public hearings at which citizens may express their views concerning the Consolidated Plan Documents shall be two (2) public hearings. These public hearings shall occur during the public review and comment period for the Annual Action Plan and for the Consolidated Annual Performance and Evaluation Report. Additional public hearings and comment periods will be held when substantial amendments to the Citizen Participation Plan, Consolidated Plan or Annual Action Plan become necessary as described later in this document. The City, at its discretion, may conduct additional outreach, public meetings or public hearings as necessary to foster citizen access and engagement.

The plan shall be effective until it is amended or otherwise replaced.

Understanding the importance of citizen input, it is the City of Springfield's goal to encourage citizen participation in the development of its five-year Consolidated Plan and Annual Action Plans, particularly from those citizens most affected by Community Development Programs. This Citizen Participation Plan establishes the policies and procedures that the City of Springfield will follow to ensure that participation is as inclusive as possible.

The City of Springfield intends that its Community Development Program has the support of the largest possible number of people in the community. Emphasis is placed on opportunities for participation by low/moderate income persons and the organizations and agencies that serve low/moderate income persons through the Community Development Block Grant Program (CDBG), HOME Investment Partnership Program (HOME), Emergency Solutions Grants (ESG) and Housing Opportunities for Persons with AIDS (HOPWA).

## **Encouragement of Citizen Participation**

The City will implement this Plan that is designed to encourage citizens to participate in the development of the Consolidated Plan, Annual Action Plan, substantial amendments to the Consolidated Plan and Performance Reports, CAPER. As described within this section, the City will encourage the input of low moderate income residents by (1) outreach to the public through mailings, (2) conducting a series of public hearings at various stages of the planning process, (3) creating a system to accept and respond to written comments from the citizens.

The City encourages participation by low and moderate-income persons, particularly those living in slum and blighted areas and in areas where CPD funds are proposed to be used, and by residents of predominantly low and moderate-income neighborhood. The City will also take appropriate actions to encourage the participation of all its citizens, including minorities and non-English speaking persons, as well as persons with disabilities.

HUD defines low and moderate-income persons or households as those whose gross annual income is less than 80% of the area median income. HUD publishes those income limits annually. For the current annual income limits citizens may contact OCD.

The City encourages the participation of local and regional institutions, the Continuum of Care and other organizations (including businesses, developers, nonprofit organizations, philanthropic organizations, and community-based and faith-based organizations) in the process of developing, amending, and implementing the Consolidated Plan. The City encourages, in consultation and cooperation with public housing agencies, the participation of residents of any public and assisted housing developments located within the City, in the process of developing and implementing the Consolidated Plan, along with other low-income residents of targeted Neighborhood Revitalization Strategy Areas (NRSAs) in which the developments are located.

The City may also explore alternative public involvement techniques and quantitative ways to measure efforts that encourage citizen participation in a shared vision for change in communities and neighborhoods, and the review of program performance. The Citizen Participation Plan has been and will continue to be amended as the City continues to gain access to technology that improves the avenues of participation.

The draft Citizen Participation Plan shall be made available for public review for a 30day period prior to the adoption of the plan, and may be done concurrently with the public review and comment process for the five year Consolidated Plan. The Citizen Participation Plan shall be provided in a format accessible to persons with disabilities upon request. Such formats may include, but are not limited to providing oral, Braille, electronic or large print versions of the plan to those visually impaired and delivering copies to those who are homebound.

The plan will encourage comment and participation by minority and non-English speakers, and, when feasible, translation services will be available upon request by contacting the OCD, [cbuono@springfieldcityhall.com](mailto:cbuono@springfieldcityhall.com).

The plan will encourage comment and participation by low- and moderate-income residents, especially those living in low- and moderate-income neighborhoods and in areas where CDBG funds are proposed to be used.

Written comments will be accepted by OCD during the public review period by emailing [cbuono@springfieldcityhall.com](mailto:cbuono@springfieldcityhall.com). A summary of all written comments and those received during the public hearing as well as the City's responses will be attached to the Citizen Participation Plan prior to submission to HUD.

The approved Citizen Participation Plan will be kept on file by the OCD, and online at: <http://www3.springfield-ma.gov/planning/index>

Hard copies can be made available to those requesting the plan by contacting the OCD, [cbuono@springfieldcityhall.com](mailto:cbuono@springfieldcityhall.com). Upon request, the approved plan will be made available in a manner accessible to non-English speakers or those with disabilities.

The City is committed to making information available and accessible to all interested parties. At a minimum, the City will provide information concerning proposed activities, including amount of assistance, range of activities to be undertaken and the amount that will benefit low/moderate income persons.

### **Development of the Consolidated Plan**

Before the City adopts a consolidated plan, the City will make available to citizens, public agencies, and other interested parties, information that includes, but not limited to:

- The amount of assistance the City expects to receive in its annual allocation, other grant funds, and program income
- The range of activities that are proposed to be undertaken
- The estimated amount of funds that will benefit persons of low- and moderate-income
- Plans to minimize displacement of persons, and to assist any persons who are displaced, including specifying the types and levels of assistance the City will make available to persons displaced even if the City expects no displacement to occur.

### **Summary of the Consolidated Plan Development Process**

- Data Collection, Outreach, and Consultation
- Con Plan Draft process
- Public Review

- Staff editing plan; finalizing document for HUD
- Submission of plan to HUD for review and acceptance

### **Publication of Materials/Notices of Hearings**

To ensure that the City provides for maximum citizen participation, the City will always provide sufficient information to permit informed comment, and conduct hearings at times and locations convenient to potential and actual beneficiaries. In order to accomplish a robust citizen participation process, the City will:

1. Ensure participation among low/moderate income residents in areas where funds are proposed to be spent and to public housing residents, by publishing legal notices with a summary of the proposed consolidated plan 14 days prior to public hearings and releases of all documents and informing citizens where hard copy or electronic documents will be available for public review. Hearings are conducted within CDBG target areas, where the majority of the funds are proposed, especially in the designated NRSA neighborhoods.

Legal notices are published in English and Spanish 14 days prior to the public hearing. Notices and information pertaining to public hearings are also published in LaVoz, Spanish newspaper to accommodate Spanish speaking residents.

2. The City will also increase its efforts to maintain communication with directors of programs to notify them of pertinent dates and presenting them with information. The City will utilize the Springfield Republican; LaVoz Spanish newspaper; Springfield Republican section Neighborhoods Plus and mailings to notify residents when and where documents will be available for public review. The documents, mailings and notices will be posted on the City of Springfield's Office of Community Development's website <http://www3.springfieldma.gov/planning/index>.
3. All documents will be made available to the public at no charge in English and Spanish. Upon request, when feasible, and within a reasonable timeframe, the Draft and approved plan will be made available in a manner accessible to other non-English speakers, or those with disabilities.
4. Notify, via direct mail, an extensive mailing list of all organizations and interested parties of the purpose, date, time and place of hearings, and inviting them to attend. Organizations are encouraged to invite persons that they serve.
5. Notify, via direct mail, an extensive mailing list of organizations and interested parties notifying them of the period of review for the Consolidated Plan, Annual Action Plans, any substantial amendments and Performance Reports. The



mailing will include a listing of locations where these documents will be made available for review.

6. Utilize the Office of Community Development's web site to publicize public hearings, periods of review, summaries of information, etc.

The City will continually review this policy and will modify accordingly.

### **Period of Review**

The City's Draft Consolidated Plan, Draft Annual Action Plan and any substantial amendments will be made available for public review and comment for thirty (30) days prior to submission to HUD. The Performance Report, CAPER, will be made available for public review and comment for fifteen (15) days prior to submission to HUD. All of these documents will be available for review at multiple locations in English and Spanish, including the Office of Community Development's website, to increase the likelihood of citizen participation. Those locations are as follows:

Office of Community Development, 1600 East Columbus Avenue; Office of Housing, 1600 East Columbus Avenue; Office of Planning and Economic Development, 70 Tapley Street; Office of Neighborhood Services, 70 Tapley Street and the City's website <http://www3.springfield-ma.gov/planning/index>.

To further elicit comment, the City offers citizens the opportunity to present testimony at public hearings or, if they prefer, written commentary may be submitted. All citizen input received will be incorporated into the City's Consolidated Plan, Annual Action Plan, Substantial Amendments and Performance Reports.

### **Public Hearings**

The City will conduct a series of public hearings to address housing and community development needs during the development of the Consolidated Plan and Annual Action Plan. The City will hold at least two (2) hearings during this phase. These hearings will be held in neighborhoods where the majority of funding has historically been spent. All public hearings shall be scheduled and conducted in compliance with applicable requirements of 24CFR Part 91.105(e). The City holds all public hearings in accessible buildings and in the evenings to maximize participation, and will utilize a translator for its Spanish residents during the public hearings. Upon request, and within a reasonable timeframe, the City will make reasonable accommodations for persons that are visually or hearing impaired. All requests for a reasonable accommodation should be directed to the Office of Community Development, 1600 East Columbus Avenue [cbuono@springfieldcityhall.com](mailto:cbuono@springfieldcityhall.com)

In order to receive comment on the Draft Consolidated Plan, Draft Annual Action Plans, and Substantial Amendments, the City will hold a public hearing during the 30-day

comment period. All comments received will be submitted to HUD as an attachment to the Consolidated Plan/Annual Action Plan, as will minutes of the public hearings. If any comments are not accepted, the City will set forth the reasons within its Plan.

In order to receive comment on the City's Consolidated Annual Performance and Evaluation Reports, (CAPER), the City will hold a public hearing during the 15-day comment period.

To address the needs of residents with disabilities and language barriers, the City publishes materials in English and Spanish, holds meeting in accessible buildings and will utilize a translator for its Spanish residents during the public hearings. Upon request, within a reasonable timeframe, the draft and approved plans will be made available in a manner accessible to other non-English speakers, or those with disabilities.

### **. Amendments**

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

- (1) To make a change in its allocation priorities or a change in the method of distribution of funds;
- (2) To carry out an activity, using funds from any program covered by the Consolidated Plan (including program income), not previously described in the Annual Action Plan; or
- (3) To change the purpose, scope, location, or beneficiaries of an activity

Once the final Consolidated Plan has been submitted by the City of Springfield for HUD's approval, significant changes, or "Substantial Amendments" to the accepted Plan will require citizen notification and comment. The criteria defining a Substantial Amendment will include:

- (a) Activities which will require new goals/objectives for the current fiscal year;
- (b) Changes in the use of CDBG funds from one eligible activity to another
- (c) An activity which will require a funding change that exceeds 30% of the approved allocation for that activity.

If any one of these actions occurs within the fiscal year of the approved Plan, community development officials will seek public comment for the proposed change. A notice published in English and Spanish will be placed in the local newspaper summarizing the significant change. The City of Springfield will make available at the aforementioned locations information describing the details of the change to the Consolidated Plan. Public input will be solicited for a period of 30-days and reviewed at

the conclusion of that time. The proposed change accompanied by a summary of the public comments and any comments not accepted and the reasons therefore will be attached to the Substantial Amendment and submitted to HUD as described below.

All other changes to the Consolidated Plan documents that do not meet the criteria defined above will be reviewed and approved by City staff and will not be subject to public comments. These changes will be fully documented and must be signed by the official representative of the jurisdiction authorized to take such action.

The City may submit a copy of each amendment to HUD as it occurs, or at the end of the program year. Letters transmitting copies of amendments must be signed by the official representative of the jurisdiction authorized to take such action.

### **Technical Assistance**

The City of Springfield will provide technical assistance to any organizations who have received funding through our programs and those that request such assistance in developing proposals for funding under any programs covered by the Consolidated Plan, either upon their request or the City of Springfield may request it. The level and type of technical assistance shall be determined by the City. During the RFP process, technical assistance is not provided; however, the subrecipient can put any questions regarding the RFP in writing and they will be answered and put on the website. The OCD will not provide any information that will give one applicant an advantage over another.

### **Anti-Displacement Plan**

The City is sensitive to displacement and the effects resulting therefrom. Therefore, prior to commencement of a project funded through the City that either potentially, or most certainly, displaces a person or persons, top City officials will consider the overall public benefit(s) of the project and discuss potential alternatives to determine whether the project should move forward. Authorization will be given only when there is significant public benefit that outweighs the displacement. In the event that displacement will occur, the City will provide the necessary assistance to affected persons to minimize the trauma of displacement. Assistance would include moving expenses, rental assistance, assistance with identifying other housing, etc. The actual type and level of assistance will be made on a case-by-case basis, but will be sufficient to ease the transition for the displaced persons. All assistance shall be in compliance with applicable sections of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended (URA).

### **Complaints**

A complaint regarding the Consolidated Planning process, Consolidated Plan amendments, and applicable programs must be submitted in writing. A written response will be made to written complaints within 15 working days, acknowledging the letter and identifying a plan of action, if necessary.

The City will accept written complaints provided they specify:

- The description of the objection, and supporting facts and data; and
- Provide name, address, telephone number of the person submitting the complaint, and a date of complaint.

All written complaints shall be submitted to: [cbuono@springfieldcityhall.com](mailto:cbuono@springfieldcityhall.com)

**APPROVED:**

\_\_\_\_\_  
Domenic J. Sarno  
Mayor

Date Signed:\_\_\_\_\_