CITY OF EAST LANSING
CONSOLIDATED PLAN PROCESS AND COMMUNITY DEVELOPMENT BLOCK GRANT
PROGRAM-CITIZEN PARTICIPATION PLAN

INTRODUCTION

The City of East Lansing is required by law to have a detailed Citizen Participation Plan (hereafter called the “Plan”) which contains the City’s policies and procedures for public involvement in the Consolidated Plan process and the use of CDBG money including CDBG funds, Section 108 Loan funds, and other grants. This Plan must be available to the public.

Encouraging Public Participation

The City of East Lansing will make reasonable efforts to provide for citizen participation throughout the planning, implementation and assessment of all CDBG program(s) undertaken by the City. Local officials will make every effort to involve citizens in all phases of the development, implementation and assessment of community development programs including, but not limited to, the following phases:

a. identification and assessment of public infrastructure, housing and community development needs; determination of CDBG project(s) and documentation
b. changes and/or amendments to approved CDBG projects; and,
c. assessment of CDBG program performance.

All phases of the community development process will be conducted by local officials in a transparent manner. Citizens of the City of East Lansing are encouraged to participate at all levels and will be given access to program information during each phase of any CDBG program as outlined herein.

The Program Year

The “program year” chosen by East Lansing is July 1 through June 30.

PUBLIC NOTICE

Items Covered by the Public Notice Requirement

There shall be advanced public notice once a federally required document is available, such as the Proposed Annual Action Plan or Five-Year Consolidated Plan, any proposed Substantial Amendment to the Action Plan or Consolidated Plan, and the Annual Performance Report (CAPER).

In addition, there shall be advanced public notice of all public hearings and all public meetings relating to the funds or planning process covered by this Citizen Participation Plan.
“Adequate” Public Notice

Adequate advance notice is given with enough lead time for the public to take informed action. Specific amounts of time are given for different events later in this Plan.

Forms of Public Notice

Public notices for public hearings on any Proposed Annual Action Plan or Five-Year Consolidated Plan, any proposed Substantial Amendment to the Annual Action Plan or Consolidated Plan, or Annual Performance Report (CAPER) will be published as display advertisements in the legal section of one of the following local publications: the Lansing State Journal, State News, and the City Pulse. Project review public hearings may be similarly advertised. Notices may also be posted on the City’s website, advertised through neighborhood groups, through direct mailings to project area residents, or any additional means of communication with East Lansing residents. The content of notices will give residents a clear understanding of the event being announced.

General Consolidated Plan and CDBG Program information shall be provided at the discretion of Program staff. Notice shall be publicized through one or more of the following: area newspapers and newsletters, cable television or radio, the City’s website, direct mailings, press releases, or social media.

Citizen comment periods - The City shall provide a 30-day comment period on any Proposed Annual Action Plan or Five-Year Consolidated Plan, any proposed Substantial Amendment, and proposed changes to the Citizen Participation Plan. The City shall provide a comment period of no less than 15 days for Annual Performance Reports to be submitted to HUD.

During times of declared disasters or emergencies by the local government, state government, or federal government, the public comment period for substantial amendments to both the Action Plan document and Consolidated Plan document is reduced to not less than 5 days. The City of East Lansing may also use virtual public hearings, when necessary for public health reasons. If virtual public hearings are used, real time responses and accommodations for persons with disabilities will be made to the farthest extent possible.

In addition, the CARES Act authorizes the Secretary to grant waivers and alternative requirements to statutes and regulations the Secretary administers in connection with the use of CDBG funds and HUD Program Year 2019 and 2020 (except for requirements related to fair housing, nondiscrimination, labor standards, and the environment). Waivers and alternative requirements can be issued when necessary to expedite and facilitate the use of funds to prevent, prepare for, and respond to Coronavirus.

PUBLIC ACCESS TO INFORMATION

As required by law, the City of East Lansing will provide the public with reasonable public
access to information and records relating to the data or content of the Consolidated Plan. Standard documents relevant to the City’s CDBG program shall be made available virtually and at the Department of Planning, Building, and Development, East Lansing City Hall, 410 Abbot Road, East Lansing, MI 48823 during normal working hours for citizen review upon request. “Standard Documents” include the following:

a. Annual Action Plan
b. Five-Year Strategic Plan (the “Consolidated Plan”)
c. Substantial Amendments to either an Annual Action Plan or the Five-Year Strategic Plan
d. Annual Performance Reports
e. The Citizen Participation Plan

The City shall also provide for full and timely disclosure of its program records and information consistent with applicable State and local laws regarding freedom of information, personal privacy, and obligations of confidentiality. These documents include all key documents such as prior applications for funding, prior scopes of service and projected use of funds documents, grant agreements, mailings and promotional materials, hearing records, copies of regulations and issuances governing the program, reports required by HUD, and other documents regarding important program requirements, such as contracting procedures, environmental policies, fair housing and other equal opportunity requirements, and relocation provisions.

**Availability of Standard Documents**

These materials will be available in a form accessible to persons with disabilities, when requested.

**Places Where Standard Documents are Available**

The City shall make copies of the Standard Documents listed above available at City Hall and the East Lansing Public Library. A reasonable number of free copies of the proposed and approved Consolidated Plan and annual Action Plans shall be provided by the City for citizens and groups. The City may also post Standard Documents and other resources on the City website.

**Records Management Procedures**

In accordance with recent HUD guidance, all documentation pertaining to the City of East Lansing’s CDBG program will be principally managed and maintained virtually by City staff. However, all CDBG documentation available to the public can be provided virtually or physically upon request.

**PUBLIC HEARINGS**

Public hearings are held to obtain the public’s views and to provide the public with the
City’s responses to public questions and proposals. The law requires at least two public hearings to address community needs, review proposed uses of funds, and assess how funds were spent during the previous program year.

Access to Public Hearings

Public hearings will be held only after there has been adequate noticed as described in the Public Notice part of this Plan, including a display advertisement in the non-legal section of the newspaper 12 days prior to the public hearing. Public hearings will be held at a convenient time and location to facilitate broad citizen participation, particularly by low- to moderate-income East Lansing residents.

Public Hearings and Populations with Unique Needs

All citywide public hearings shall be held at accessible locations to allow for the full participation of residents with disabilities. For neighborhood meetings, if no accessible neighborhood facility is available, the notice of public hearing shall so indicate and invite the submission of written comments by residents with disabilities. Non-English-speaking citizens may arrange for translation services by notifying the City at least five days prior to the event. The City of East Lansing may also use virtual public hearings when necessary for public health reasons and permitted under state and local law. If virtual public hearings are used, real time responses and accommodations for person with disabilities will be made to the furthest extent possible.

THE STAGES IN THE PROCESS

A. Identifying Needs of the Annual Action Plan

The City of East Lansing seeks to obtain citizen input each year to identify public infrastructure, housing, and community development needs and what priority those needs have. East Lansing identifies the needs of the community when it begins planning for the next program year through outreach activities which may include public meetings, neighborhood meetings, focus groups, and surveys. Needs are assessed throughout the year; however specific public meetings shall be held between March-May. It is important to note that, as documented within the 2021-2025 Consolidated Plan document, members of the public and City Council identified the following high priority project activities:

a. homeowner rehabilitation
b. down payment assistance towards the purchase of a home
c. emergent subsidy housing payments
d. overnight shelter and job training for persons experiencing homelessness
e. persons trying to escape households with domestic abuse
f. public infrastructure projects
g. senior assistance projects

B. The “Proposed Annual Action Plan (and/or Five-Year Strategy)
In November of each year, the City will issue a public notice or press release requesting organizations to submit proposals for CDBG activities for the upcoming fiscal year. Applications will close in December of each year. From here, the following process is followed to create the Annual Action Plan.

The Community Development Advisory Committee (hereafter referred to as the “CD Advisory Committee” or “Committee”) provides citizen oversight for the Consolidated Plan and Annual Action Plan development process. According to Policy Resolution 2021-17, the CD Advisory Committee is charged with working with City staff to review applications, conduct public hearings, and make recommendations to East Lansing City Council regarding the Community Development Block Grant program.

During the months of January and February, the CD Advisory Committee will hold public meetings to review applications and draft a budget recommendation for the City’s CDBG funds. The draft CDBG budget will outline funding allocations to specific agencies and projects. The CD Advisory Committee will hold a first public hearing in March to hear comments on the draft CDBG budget. After this, the Committee’s recommendation will be presented to East Lansing City Council by City staff. Council will then hold a second public hearing on the draft CDBG budget in April or May.

Notices for both public hearings shall be disseminated to stakeholder and neighborhood groups or organizations including, but not limited to:

a. East Lansing Council of Neighborhood Presidents;
b. organizations providing public services;
c. organizations concerned with housing and related supportive services; and
d. special needs groups.

Additionally, the City will be intentional about encouraging the participation of marginalized communities as well as low-to moderate-income persons, particularly those residing in low-to moderate-income areas.

Final approval of the CDBG budget will be made in the form of a majority vote by Council, held in April or May.

Following approval of the proposed CDBG fiscal year budget by the East Lansing City Council, City staff shall finish drafting and publish the Proposed Annual Action Plan for review by the public prior to its submission to the U.S. Department of Housing & Urban Development. Public notice is given that the Proposed Annual Action Plan is available for public review and comment on over a period of 30 days. The public notice includes:

1. The total amount of CDBG funds, Section 108 Loan funds, and other grants anticipated to be made available by the City for the coming year, including program income anticipated to be generated by the activities carried out with CDBG or
guaranteed loan funds, for housing and community development activities, including planning and administrative activities,

2. The range of activities that may be undertaken with these funds and the kind of activities previously funded in the community, including the estimated amount proposed to be used for activities that will benefit low- and moderate-income persons.

3. The role of citizens in the Consolidated Plan and Annual Action Plan, as provided for in this Plan,

4. A summary of other important program requirements such as Davis-Bacon, environmental policies, equal employment opportunity, fair housing, Section 3 Affirmative Action Plan requirements.

5. Any proposed activities likely to result in displacement and the public entity’s relocation provisions.

During times of declared disasters or emergencies by the local government, state government, or federal government, the public comment period for substantial amendments to both the Action Plan document and Consolidated Plan document is reduced to not less than 5 days. The City of East Lansing may also use virtual public hearings, when necessary for public health reasons. If virtual public hearings are used, real time responses and accommodations for persons with disabilities will be made to the farthest extent possible.

**Availability of a Proposed Annual Action Plan**

The City will make the Plan available to the public at least 30 days prior to approval by so that persons of low- and moderate- income will have a reasonable opportunity to examine it and to submit comments.

In preparing a Final Annual Action Plan, careful consideration will be given to all comments and views expressed by the public, including verbal comments from public hearings or written comments submitted during the review and comment period. The Final Annual Action Plan will include a summary of all comments received and explain why any comments were not accepted.

**Technical Assistance**

The City's CDBG Program Staff shall be available throughout the year to meet with individuals and groups, discuss their project proposals, and provide information and assistance. Technical assistance is available both to plan projects eligible under the City's Consolidated Plan and to help form a neighborhood or project area organization. Staff shall also attend neighborhood association meetings when requested to review the City's CDBG Program with its members and discuss project proposals. Citizens must directly request technical assistance from the City.

All individuals and groups who submit a proposal for CDBG funding must notify and solicit comments from any property owner who might be affected by any physical
improvement project or program. City staff, in reviewing proposals, will require the name of the affected property owner/contact person in order to verify and/or solicit comments from the person. If the group making a project/proposal is not able to provide City staff with the comments or position of the affected property owner, City staff will seek such comments or position.

C. The “Final” Annual Action Plan (and/or Five-Year Strategy)

Copies of the Final Annual Action Plan and a summary of it will be made available to the public for free. In addition, copies will be available at the locations specified above in the section “Public Access to Information.”

D. “Amendments” to the Annual Action Plan (and/or Five-Year Strategy)

This Plan specifies the criteria East Lansing will use for determining when one or several cumulative change(s) in the jurisdiction’s planned or actual activities exceed the amendment threshold and constitute a need for amendment to the Consolidated Plan.

A change in the use of CDBG or Section 108 Loan funds from one eligible activity or cumulative activities that is 10% or less of the fiscal year CDBG entitlement amount is not considered “substantial” and will not require a substantial amendment to that fiscal year’s Annual Action Plan.

Under program regulations, the City must amend any Annual Action Plan whenever it decides:

1. Not to carry out a CDBG or Section 108 Loan-funded activity described in any Annual Action Plan;
2. To carry out a CDBG or Section 108 Loan-funded activity not previously described; or,
3. To substantially change the purpose, scope, location, or beneficiaries of a CDBG or Section 108 Loan-funded activity as described below:

   a. "Substantial change in purpose" shall mean that the original purpose of a proposed activity shall either not be accomplished or shall be accomplished to only a minimal degree or that a new purpose shall be the primary purpose of such activity.

   b. "Substantial change in scope" shall mean that the original scope of a proposed activity shall either not be accomplished or shall be accomplished to only a minimal degree or shall mean that a new scope shall be the primary scope of such activity.

   c. "Substantial change in location" shall mean that the location in which a proposed activity is to be carried out shall be changed so that the activity shall not be carried out at all or to any significant degree in the originally proposed location or shall mean that a new location shall be the primary
location for undertaking such activity.

d. "Substantial change in beneficiaries" shall mean that the group or groups of individuals that an activity was intended to benefit or was believed would benefit, shall either not benefit or shall only benefit to a minimal degree or shall mean that another group of individuals shall be the primary beneficiaries of such activity.

Contingency and Local Option Activities

The City Staff shall recommend to the CD Committee or City Council the contingency and/or local option activity (ies) desired to be specified in the Annual Action Plan. After receiving the Staff recommendation, the CD Committee shall make a recommendation to the City Council.

Public Notice and Public Hearing for Substantial Amendments

Notice to the public of proposed program amendments shall be given to the public as specified in the “Public Notice” section above. The City shall also contact citizens and groups who may be directly affected by a proposed program amendment either by mail or by telephone and shall provide notification of the proposed amendment and the scheduled public hearing.

Proposed program amendments shall be placed on the agenda of the East Lansing City Council. The City Council will determine whether to hold a public hearing at one of its regularly scheduled Council meetings and shall thereupon either approve or disapprove the proposed program amendment.

At least 30 days shall be allowed for citizen comments on any proposed Consolidated Plan or Annual Action Plan amendment. The 30-day comment period shall begin on the date public announcement is made of the proposed amendment. No amendment shall be implemented by the City until after the 30-day citizen comment period.

The City shall include a summary of any citizen comments not adopted in response to any proposed Consolidated Plan or Annual Action Plan amendment, and the reasons that those views were not adopted in the amended Consolidated Plan or Annual Action Plan.

During times of declared disasters or emergencies by the local government, state government, or federal government, the public comment period for substantial amendments to both the Action Plan document and Consolidated Plan document is reduced to not less than 5 days. The City of East Lansing may also use virtual public hearings, when necessary for public health reasons. If virtual public hearings are used, real time responses and accommodations for persons with disabilities will be made to the farthest extent possible.
E. The Annual Performance Report

Every year, the City of East Lansing must send a Consolidated Annual Performance Report (CAPER) to HUD within 90 days of the close of the program year. In general, the Consolidated Annual Performance Evaluation Report describes the specific use of program year funds and the extent to which funded activities benefited low-to moderate-income people.


Notice shall be given that the Consolidated Annual Performance Evaluation Report (CAPER) is available so that residents will have an opportunity to review and comment on it. Notice will be made according to the procedures described earlier in this Plan with the addition of the following procedures specific for the Annual Performance Reports:

1. A complete copy of the report will be made available to the public at no cost. Copies will be available at the locations indicated earlier in this Plan under “Public Access to Information.”

2. CDBG Program Staff shall hold a public hearing each year prior to the date the City submits the CAPER in order to obtain comments from the public and in order to review program progress and performance.

3. City of East Lansing citizens and citizen organizations shall be given the opportunity to assess and submit comments on all aspects of the City's Consolidated Plan performance, including the performance of the City's grantees and contractors. They shall also be given the opportunity to assess projects and activities to determine whether objectives are achieved. Such participation in the assessment of the City's Consolidated Plan performance shall be elicited from citizens and citizen organizations at the public hearing. A comment period of not less than 15 days shall be provided on performance reports to be submitted to HUD.

COMPLAINT PROCEDURES

The City’s Community Development Staff shall provide a written response to complaints within 15 working days of their receipt, where practicable. Upon successful resolution of the complaint no further action shall be taken. If further action is required, a copy of the complaint along with the Staff’s proposed resolution and response shall be sent to the Director of Planning, Building & Development. Formal complaints should be written and mailed, e-mailed, or delivered to the Department of Planning, Building & Development office.

CHANGING THE CITIZEN PARTICIPATION PLAN

This Plan can be changed only after the public has been notified of intent to modify it, and
only after the public has had a reasonable chance to review and comment on proposed substantial changes to it. The public notice and comment period shall be the same as for a substantial amendment to the Consolidated Plan, which is 30 days unless a local, state, or federal disaster is declared. In such a case, public comment regarding a substantial amendment to the Consolidated Plan document shall be no less than 5 days.

APPENDIX I
CRITERIA FOR WAIVING PROJECT REVIEW PUBLIC HEARINGS

1. **Standard Design/Predetermined Location**

   Project review hearings will not be held in the case of a public improvement project which has a design which cannot be modified by the public and where the location of the project has been predetermined through the CDBG Program development process.

2. **General Agreement Reached At First Project Review Hearing**

   A second project review public hearing will not be held for those projects where general agreement on the project design was reached at the first public hearing. For those projects where this criterion applies, staff will notify all property owners directly abutting the project location about the project design and give such owners ten days from the receipt of the notification to comment on the design. If as a result of this notification process a major concern is raised, Staff will either schedule a second public review hearing or notify the East Lansing City Council as to the concern which has been raised.

3. **Project Constituency Is Not Neighborhood Based**

   For those projects where the constituency is not neighborhood based (e.g., bike racks, or handicap ramps in a commercial area) a citywide public review hearing may be held. Comments will be solicited from organizations and persons who have shown or are known to have interest in the project.