

CITIZEN PARTICIPATION PLAN DAKOTA COUNTY CONSORTIUM

Anoka County/Dakota County/Suburban Ramsey County
Washington County/ City of Woodbury

1. Introduction

The Citizen Participation Plan, hereafter referred to as CPP, is the framework that sets forth the policies and procedures the Dakota County Consortium will follow to provide for and encourage public participation in the development of the jurisdictions' Consolidated Plan and Assessment of Fair Housing (AFH). The goal is to involve and partner with all local citizens, neighborhoods and areas impacted in the implementation of the housing and community development programs provided by the Consortium members. The CPP also applies to any substantial amendments to the Consolidated Plan, to the preparation of the Annual Action Plans, to the performance report which evaluates the progress in meeting the Consolidated Plan objectives and to the AFH.

The provisions of the CPP fulfill the statutory and regulatory requirements pursuant to 24 CFR parts 91 et al, the Dakota County Consortium is required to adopt as formula grantees of HUD entitlement fund programs. The Dakota County Consortium receives entitlement funds from the following three programs: Community Development Block Grant (CDBG), the HOME Investment Partnerships (HOME) and Emergency Solutions Grant (ESG). These programs provide approximately \$4.5 million in federal grants for community economic development and housing priorities. The Dakota County Consortium also applies for other federal funding such as Shelter Plus Care (S+C), Supportive Housing Program (SHP) and Neighborhood Stabilization (NSP) to achieve its objectives. Dakota County is the only recipient of ESG funds. As such, all references in this document related to ESG uses pertain only to Dakota County.

This is the overall Citizen Participation Plan for the Dakota County Consortium. Each member community must meet the minimum requirements set forth herein. However, members are free to add opportunities for citizen participation beyond those required here.

2. Definitions

The Dakota County Consortium, here on referred to as *the Consortium*, members are made up of Anoka County, Suburban Ramsey County, Washington County, and the City of Woodbury. Dakota County is the lead agency for the Consortium and has appointed the Dakota County Community Development Agency (CDA) the lead entity responsible to oversee the administration of the Consortium and submit all consolidated planning documents to HUD.

Each Consortium member is considered a formula grantee for CDBG funds on their own; as an authorized formation for the purpose of receiving HOME funds; and Dakota County only receives ESG funds. A fourth grant, which the Consortium is not a direct recipient of, Housing Opportunities for Persons with AIDS (HOPWA), is regionally covered by the City of Minneapolis which administers HOPWA funding for the metropolitan area.

A *federal formula grant* is awarded to a jurisdiction based upon a formula that takes into account factors such as the number of households in poverty, age of housing stock, population and economic growth, and in the case of HOPWA, the number of reported cases of people with AIDS in the metropolitan area. The U.S. Congress appropriates federal grants annually so each grant amount may vary from year to year.

Each grant fund is subject to specific regulatory requirements and has specific applications for which the funds can be spent.

- *The Community Development Block Grant (CDBG)* is a flexible program that granted to larger cities and urban counties to develop viable communities by providing decent housing, a suitable living environment, and opportunities to expand economic opportunities
- *The HOME Investment Partnership (HOME)* provides formula grants to States and localities that communities used-often in partnership with local nonprofit groups-to fund a wide range of activities that build, buy, and/or rehabilitate affordable housing for rent or homeownership or provide direct rental assistance to low-income people.
- *The Emergency Solutions Grant (ESG)* recipients are state governments, large cities, and urban counties who provide assistance for individuals and families to quickly regain stability in permanent housing after experiencing a housing crisis or homelessness.
- *Housing Opportunities for Persons with AIDS (HOPWA)* is provided to the eligible metropolitan statistical area (EMSA) and can be used for a variety of housing and services for people living with HIV and their families.

As recipients of these formula grant funds, the Consortium is required to produce the following documents:

- *The Consolidated Plan* is a five-year planning document intended to established a unified vision for community development, outlines coordinated strategies to address community needs related to housing and economic development, identifies proposed programs and establishes goals and projected accomplishments over the five-year period.
- *Annual Action Plan* is the annual planning document that describes how the specific federal formula funds are going to be spent over the course of the upcoming program year and the projects that will be undertaken to accomplish the strategies and goals that were set forth in the five-year Consolidated Plan.
- *Consolidated Annual Performance and Evaluation Report (CAPER)* is the annual report that evaluates the uses of the formula grants, outlines the yearly expenditures, and assesses the jurisdictions' progress at implementing their Annual Action Plan as well as reaching the goals set in the five-year Consolidated Plan.
- *Assessment of Fair Housing (AFH)* is an analysis of fair housing issues in the Consortium's jurisdictions and region that results in goals that inform the strategies and actions of the Consolidated Plan and the Annual Action Plan.¹

¹ HUD published three Notices on May 23, 2018 in the Federal Register clarifying Consolidated Plan program participants' legal obligation to affirmatively further fair housing. The Notices announced HUD has withdrawn the current version of the Local Government Assessment Tool, which is used to complete the Assessment of Fair Housing (AFH). Therefore, the Consortium must continue to comply with applicable fair housing planning procedures, meaning the Consortium should comply with the existing Analysis of Impediments (AI) to fair housing choice requirements by having an up-to-date AI and taking action to affirmatively further fair housing in accordance with the AI.

- *Substantial Amendment* is an amendment to any of the aforementioned documents by which a “substantial change” in priority need/objective or planned activity is to occur. A “substantial change” is defined further in the Citizen Participation Plan.

The Consortium’s fiscal/program year runs July 1 through June 30. The Consortium must submit its Consolidated Plan by May 15 in the year it is due, Annual Action Plans by May 15 each year, and CAPERs by September 28 each year.

The intent of the grants is to principally benefit low – and moderate–income persons or low-and moderate-income neighborhoods:

- *Moderate-income* is a household whose income is 80% or less of the area median income (AMI).
- *Low-income* is a household whose income is below 50% AMI.
- *A low-and moderate-income neighborhood* is a geographic area where more than 51% of the households have incomes that are at or below 80% of AMI.
- *Area Median Income (AMI)* is the median income determined by HUD for a particular area. HUD sets the area median income each year by publishing a table that shows median income for households of different sizes. Find the area median income table at: <http://www.huduser.org/portal/datasets/il.html>

All members of the Consortium are a part of the Minneapolis-St. Paul-Bloomington MSA.

3. Encouraging Citizen Participation

Interested groups and individuals are encouraged to provide input into all aspects of the Consortium’s consolidated planning activities, from assessing needs and setting priorities through performance evaluations. The CPP outlines the Consortium’s responsibility for providing opportunities for active participation from citizens of all income levels to contribute information, ideas, and opinions about ways to improve our neighborhoods, promote housing affordability, and enhance the delivery of public services to local residents.

In developing its Consolidated Plan, Annual Action Plans, Substantial Amendments, CAPER and AFH, the Consortium will take appropriate actions to encourage citizen participation by all residents of the Consortium-member communities, emphasizing the involvement of:

- Low-and moderate-income persons, particularly those living in areas where federal funds are proposed to be used;
- Residents of predominantly low-and moderate-income neighborhoods;
- Minorities;
- Persons with Limited English Proficiency;
- Persons with disabilities;
- Residents of public and assisted housing developments; and
- Local and regional institutions, the regional Continuum of Care (known as SMAC) and other organizations including businesses, developers, nonprofit organizations, philanthropic organizations, and community-based and faith-based organizations.

Each member will decide how best to engage the citizens within their jurisdiction. Each member must afford its citizens the opportunity to comment on the development of the Consolidated Plan/Annual Action Plan, AFH and on performance reports (CAPER) by way of a public comment period and a public hearing. Additional methods the public *may* be engaged:

- Community meetings
- Focus groups
- Surveys
- Public Housing Agency (PHA) plans

a. Public Hearings

Each member of the Consortium individually will typically conduct at least two public hearings a year to obtain citizens' views and respond to comments and questions. An additional public hearing will be held during the year AFH is being developed. The hearings will take place at different stages of the planning processes. At least one public hearing will be held to solicit comments on the development of the Consolidated Plan and/or Annual Action Plan and AFH, which includes the proposed uses of CDBG, HOME and ESG funds or fair housing issues. Another public hearing will occur during the development of the CAPER, which will be held prior to the submission to HUD. Information about the time, location and subject of each hearing will be provided to citizens through the adopted public notice procedures.

As the lead entity for the Consortium, the Dakota County Board of Commissioners will hold a public hearing prior to the submission of the Consolidated Plan and/or Annual Action Plan to the U.S. Department of Housing and Urban Development (HUD). Governing boards of other consortium members may also hold public hearings for their residents.

Every effort will be made to ensure that public hearings are inclusive. Hearings will be held at convenient times to accommodate work and school schedules, preferably in the evening, and at locations where people most affected by proposed activities can attend. The Consortium will utilize public hearing facilities that are accessible to persons with mobility impairments, usually libraries, administration buildings, or city halls. The Consortium will also utilize virtual public meeting technology when necessary to comply with federal, state, or local emergency orders issued for public health, natural or other declared disasters, or for other reasons as may arise from time to time. Each Consortium member will provide detailed information to the public about the virtual public meeting technology that will be used and how the public can provide comments during the public meetings.

If notice is given at least seven (7) days before a hearing date, the Consortium will provide reasonable accommodations for limited English proficient persons and persons with visual and/or hearing impairments. Each Consortium member will follow their adopted LEP plans

b. Public Notices and Publication of the Proposed Consolidated Plan

A public notice will be published in one or more newspapers of general circulation at least ten (10) days prior to the public hearing but not more than two (2) weeks. When possible, the Consortium will utilize display ad notices in newspapers of general circulation. Due to the high cost of publishing in print media, a summary of the proposed Consolidated Plan and/or Annual Action Plan will be published. Consortium members will post either a full document or an executive summary on their website and any other websites deemed appropriate.

The information to be provided to the public on or before the public hearing will include:

1. The amount of assistance the local government expects to receive (including grant funds and program income);
2. The range of activities that may be undertaken;
3. The estimated amount of funding that will benefit person of low-and moderate incomes; and
4. The anti-displacement and relocation plan

Either the full document or an executive summary of the Consolidated Plan, Annual Action Plans, CAPER and/or AFH will be made available at the main office of each Consortium member and at various locations throughout the Consortium member's jurisdiction. Locations would include public libraries, government centers, and city halls.

Citizens and groups may obtain a reasonable number of free copies of the proposed Consolidated Plan or AFH by contacting the main office of the Consortium member(s). A list of contact information can be found on page 7 of the CPP.

c. Public Comments

Citizens and other interested parties may present oral comments at the time of a hearing and/or submit written comments. A public comment period of not less than thirty (30) days will be afforded for the Consortium to receive comments from citizen on its proposed Consolidated Plan and/or Annual Action Plan, any substantial amendments to the plans and AFH.

COVID-19 PANDEMIC WAIVERS: HUD released a memo on March 31, 2020 that provided waivers to certain provisions of federal statutes pertaining to the 30-day public comment period due to the COVID-19 pandemic for the Consolidated Plan and Annual Action Plans. Dakota County informed the Minneapolis Field Office on April 8, 2020 that it would utilize the waivers to reduce the public comment period from 30 days to no less than five days for any substantial amendments to the FY 2020 Action Plan and FY 2019 Action Plan to use funds from these years for activities related to the COVID-19 pandemic. HUD also released memos on April 10, 2020 that provided waivers due to the COVID-19 pandemic for the HOME Program. The Dakota County HOME Consortium informed the Minneapolis Field Office on April 17, 2020 that Consortium members would utilize the waivers to reduce the 30-day comment period to not less than five days. This waiver is in effect for any necessary substantial amendments to FY 2020 and earlier Consolidated Plans or Action Plans.

The public comment period for the CAPER will be fifteen (15) days.

The Consortium will consider all comments or views of citizens received in writing or orally at public hearings and during the public comment period in preparing the final Consolidated Plan and/or Annual Action Plan or AFH. A summary of these comments or views, and a summary of any comments or views not accepted and any such reasons therefore not accepted, shall be included in the applicable Consolidated Plan and/or Annual Action Plan or CAPER of AFH.

Consortium members are required to respond to complaints. See section 7 of the CPP for further details on the process members will follow.

d. Technical Assistance

Groups or individuals interested in obtaining technical assistance to develop project proposals or apply for funding assistance through HUD formula grant programs covered by the Consolidated Plan may contact staff of the Consortium. The level and type of assistance provided is determined by the Consortium member. Receiving technical assistance does not guarantee award of funds.

4. Displacement and Relocation

Each Consortium member prepares an anti-displacement and relocation plan. Consortium members attempt to avoid displacement whenever possible, while realizing that in some situations it is unavoidable. In the event displacement occurs, Consortium members will follow their HUD approved Anti-displacement and Relocation Plans. These plans are available for review upon request.

5. Amendments to the Consolidated Plan or Annual Action Plans

The CPP requires the Consortium to identify the criteria it will use for determining what constitutes a substantial amendment to the Consolidated Plan and/or Annual Action Plans. The Consortium shall amend its approved plan whenever it makes on one of the following decisions:

- An activity included in a consolidated plan or annual action plan is canceled;
- An activity not previously included in a consolidated plan or annual action plan is added;
- An activity's budget is increased or decreased by \$100,000.00 or more at one time;
- The location and/or national objective of an activity changes; or
- The allocation priorities within a Consortium member's jurisdiction change.

Notices announcing the requested substantial amendment and the start of a thirty (30) day public comment period will appear in one or more newspapers of general circulation. After the comment period, the requested change goes before the appropriate governing body for approval. Changes that occur that do not meet the above definition are considered administrative in nature and do not go through the substantial amendment process. These changes are made internally and appear in the CAPER at the end of the program year.

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6. Access to Records

The Consortium will provide citizen, public agencies, and other interested parties with reasonable and timely access to information and records relating to the Consolidated Plan and/or, Annual Action Plans, AFH and the use of funds under the CDBG, HOME and ESG programs during the preceding five years.

A hard copy of the final adopted Consolidated Plan, Annual Action Plans, CAPER and AFH will be available for public inspection during normal business hours of the Consortium members' main office. Electronic versions of the aforementioned documents are available at all times on the Consortium members' websites. Residents without computers and/or internet access may gain access to the documents at any public library location throughout the Consortium's jurisdictions.

If requested, the public will be provided a reasonable number of free copies of each aforementioned document within a reasonable period of time. If requested, the document will be provided in alternative formats within a reasonable period of time and mailed copies to those who are homebound.

7. Response to Written Citizen Complaints

The Consortium will, to the best of its ability and to the extent possible, provide within fifteen (15) working days a written response to any complaint related to the Consolidated Plan, Annual Action Plans, Substantial Amendments, CAPER, AFH or Citizen Participation Plan made in writing to the appropriate Consortium member. A list of contacts is available in section 10 of the CPP.

8. Amendments to the Citizen Participation Plan

The Consortium will provide citizens with a reasonable opportunity, no less than ten (10) days, to comment on any substantial amendments to the Citizen Participation Plan.

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9. Availability of the Citizen Participation Plan

Copies of the Citizen Participation Plan may be obtained by contacting the appropriate Consortium member. Upon request, Consortium members will make the plan available in an alternative format of anyone requested a special accommodation.

10. Contact and Resource Information

If a resident of:	Contact	Address & Phone Number	Web Site
Anoka County	Community Development Manager	Anoka County Courthouse 2100 Third Ave Suite W-250 Anoka, MN 55303 763-324-4613	www.co.anoka.mn.us
Dakota County	Community & Economic Development Representative	1228 Town Centre Drive, Eagan, MN 55123 651-675-4400	www.dakotacda.org
Ramsey County	Community & Economic Development Representative	250 Ramsey County Court House 15 W Kellogg Blvd St Paul, MN 55102 651-266-8000	www.co.ramsey.mn.us
Washington County	Housing & Redevelopment Representative	Washington County HRA 7645 Currell Boulevard Woodbury, MN 55125 651-458-0936	www.wchra.com
Woodbury	Community Development Coordinator	8301 Valley Creek Road Woodbury, MN 55125 651-414-3438	www.ci.woodbury.mn.us

The Dakota County Consortium Adopted a Citizen Participation Plan:
5/1998

Since then it has been revised:

5/2000	5/2015
6/2002	5/2016
11/2004	7/2017
5/2005	6/2018
8/2009	5/2019
6/2010	5/2020
7/2012	
5/2013	