

## **City of Holland Citizen Participation Plan Community Development Block Grant Program**

The City of Holland adopts this citizen participation plan that sets forth the city's policies and procedures for citizen participation and consultation to comply with 24 CFR (Code of Federal Regulations) 91.105 for local governments in the U.S. Department of Housing and Urban Development (HUD) Community Development Block Grant (CDBG) entitlement program.

**A. Encouragement of Citizen Participation** - This plan is adopted to encourage citizen participation. The City's Neighborhood Improvement Committee (NIC) is a City Council-appointed body made up of residents of the City of Holland. The NIC is the primary body responsible for advising Holland City Council on administration of the CDBG program, including development of the consolidated plan, including corresponding annual action plans, amendments, and performance reports.

1. The City of Holland encourages citizens to participate in the development of any consolidated plan, substantial amendment to the consolidated plan, and the performance report (CAPER). These requirements are designed specially to encourage participation by low-and moderate-income persons, particularly those living in areas where CDBG funds are proposed to be used, and by residents of predominantly low- and moderate-income neighborhoods. The City of Holland will take whatever actions are appropriate to encourage the participation of all its citizens, including minorities and non-English speaking persons, as well as people with disabilities.
2. The City of Holland shall encourage 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 and implementing the consolidated plan.
3. The City of Holland will 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; e.g., use of focus groups and the internet.

**B. Citizen comment on the citizen participation plan and amendments** - The City of Holland will provide citizens with a reasonable opportunity to comment on the original citizen participation plan and on substantial amendments to the citizen participation plan and will make the citizen participation plan public. The citizen participation plan will be made available in a format accessible to people with disabilities, upon request. The City of Holland will also take all reasonable action to provide language assistance to assure meaningful access to participation by non-English-speaking residents of the city.

**[Definition of Substantial Amendment to Citizen Participation Plan** - Amendments to the Citizen Participation Plan will be considered substantial only if the City of Holland proposed to change the notice or comment period requirements. Other changes to comply with HUD requirements will be considered minor amendments that do not require citizen participation.]

C. **Development of the Consolidated Plan (within this document, Consolidated Plan refers to Five-Year Consolidated Plans and Annual Action Plans)** - The citizen participation plan includes the following minimum requirements for the development of the consolidated plan.

1. **Consolidated Plan Development** - Before it adopts a consolidated plan, The City of Holland will make available to citizens, public agencies, and other interested parties, information that includes the amount of assistance The City of Holland expects to receive (including grant funds and program income) and the range of activities that may be undertaken, including the estimated amount that will benefit persons of low and moderate income. The City of Holland will minimize any projects that cause the displacement of persons. The City of Holland expects no displacement to occur. If persons are displaced as a result of a CDBG-funded activity, the property owner will be responsible for the cost of relocating residents.
2. **Publishing** - The City of Holland will publish the proposed consolidated plan in a manner that affords citizens, public agencies, and other interested parties a reasonable opportunity to examine its contents and to submit comments. The City of Holland will publish the proposed consolidated plan and give reasonable opportunity to examine the contents of the proposed consolidated plan. The City of Holland will publish a summary of the proposed consolidated plan in one or more newspapers of general circulation, and by making copies of the proposed consolidated plan available at Holland City Hall, or via the City of Holland website. The summary will describe the contents and purpose of the consolidated plan and include the location where copies of the entire proposed consolidated plan may be examined. In addition, the City of Holland must provide a reasonable number of free copies of the plan to citizens and groups that request it.
3. **Public Hearing** - The City of Holland will provide for **at least one public hearing** during the development of the consolidated plan. See section F for public hearing requirements, generally.
4. **Comment Period** - The City of Holland will provide a period **not less than 30 days** to receive comments from citizens on the **consolidated plan**.
5. **Consideration of Comments** - The City of Holland will consider any comments or views of citizens received in writing or orally at the public hearings in preparing the final consolidated plan. A summary of these comments or views, and a summary of any comments or views not accepted and the reasons thereof, shall be attached to the final consolidated plan.

D. **Criteria for Amendments**

1. **Consolidated Plan Amendments** - Amendments will be processed as follows:
  - a) If The City of Holland elects not to carry out an activity contained in a CDBG program year; or
  - b) If The City of Holland elects to carry out activities other than those described in the CDBG program year; or
  - c) The City of Holland proposes to make any **substantial change** in the use of the CDBG funds from one eligible activity to another; then, a substantial amendment is required.Amendments that do not qualify as those described in items a) through c) above would, in most cases, only require a minor amendment.

Note: Unless **substantial change** is otherwise defined by HUD regulations, it shall include any change in which:

- i. The City proposes to use more than ten percent of the annual entitlement amount for the affected program year to undertake one or more new activities;
  - ii. The City proposes to alter the stated purpose, location or class of beneficiaries of previously approved activities whose cost exceeds 10 percent of the entitlement amount for the affected program year;
  - iii. The combination of proposed new activities, and changes in the purpose, location or class of beneficiaries of previously approved activities involves more than ten percent of the entitlement amount approved for the affected program year;
  - iv. The cumulative effect of a number of smaller changes involving new activities, changes in the purpose, location or class of beneficiaries of approved activities exceeds ten percent of the entitlement amount approved for the affected program year.
2. **Publishing and Comment Period** - The City of Holland will publish a summary of the proposed **substantial amendment**, give reasonable opportunity to examine the contents of the amendment, and will provide a period, not less than **30 days** to receive comments on the amendment before it is implemented. The City of Holland will publish a summary of the proposed amendment in one or more newspapers of general circulation, and make copies of the proposed substantial amendment available at Holland City Hall, or via the City of Holland website. The summary will describe the contents and purpose of the amendment and include the location where copies of the entire proposed amendment may be examined.
3. **Consideration of Comments** - The City of Holland will consider any comments or views of citizens received in writing, or orally at public hearings, if any, in preparing the substantial amendment of the consolidated plan. A summary of these comments or views, and a summary of any comments or views not accepted and the reasons thereof, shall be attached to the substantial amendment of the consolidated plan.

#### E. **Performance Reports**

1. **Publishing and Comment Period** - The City of Holland will publish a summary of any **performance reports**, give reasonable opportunity to examine the contents of the report, and will provide a period not less than **15 days** to receive comments on them before they are submitted to HUD. The City of Holland will publish a summary of performance reports in one or more newspapers of general circulation, and make copies of the reports available at Holland City Hall, or via the City of Holland website. The summary will describe the contents and purpose of the performance report and include the location where copies of the entire report may be examined.
2. **Comments** - The City of Holland will consider any comments or views of citizens received in writing, or orally at public hearings in preparing the performance report. A summary of these comments or views shall be attached to the performance report.

- F. **Public Hearings** - The City of Holland will hold a least two public hearings per year to obtain citizens' views and to respond to proposals and questions, to be conducted at a minimum of two different stages of the program year. Together, the hearings must address housing and community development needs, development of proposed activities, proposed strategies and actions for affirmatively furthering fair housing, and review of program performance. To obtain the views of citizens on housing and community development needs, including priority non-housing community development needs and affirmatively furthering fair housing, the City of Holland will hold at least one of these hearings before the proposed consolidated plan is published for comment.
1. **Notice of Public Hearings** - The City of Holland will provide adequate advance notice to citizens of each hearing, with sufficient information published about the subject of the hearing to permit informed comment. **The minimum notice for Public Hearings is two weeks.** The hearings be held at times and locations convenient to potential and actual beneficiaries, and with accommodation for people with disabilities.
  2. **Aids for people with disabilities, or non-English speaking residents** - The City of Holland will provide necessary services and auxiliary aids, such as signers for hearing impaired and audiotapes of printed materials, to individuals with disabilities, upon receipt of seven days prior notice. People with disabilities requiring auxiliary aids services should contact the City of Holland by writing or calling: Human Relations C/O City Clerk's Office, 270 S River Avenue Holland, MI 49423, telephone 616.355.1301. Language translations or interpretations will be provided upon request with seven days prior notice.
- G. **Meetings** - The City of Holland will provide citizens with reasonable and timely access to local meetings, in accordance with section 504 of the Rehabilitation Act of 1973, the Americans with Disabilities Act, and the regulations at 24 CFR part 8 and 24 CFR parts 35 and 365, as applicable.
- H. **Availability to the public** - The consolidated plan as adopted, substantial amendments, and the performance report will be available to the public, including the availability of materials in a form accessible to people with disabilities, upon request.
- I. **Access to records** - The City of Holland will provide citizens, public agencies, and other interested parties with reasonable and timely access to information and records relating to The City of Holland's consolidated plan and The City of Holland's use of assistance under the programs covered by this part during the preceding five years.
- J. **Technical assistance** - Technical assistance will be provided to groups representative of persons of low- and moderate-income that request such assistance in developing proposals for funding assistance under any of the programs covered by the consolidated plan, with the level and type of assistance determined by The City of Holland. The assistance need not include the provision of funds to the groups.
- K. **Complaints** - The City of Holland will provide a timely, substantive written response to every written citizen complaint, within an established period of time (within 15 working days). The response shall 1) state that the complaint will be addressed at the next Neighborhood Improvement Committee Meeting 2) Include a notice to where and when the meeting is to take place, and 3) encourage complainant to attend the meeting. A copy of the complaint along with the Staff's response shall be

sent to Committee members. Within seven (7) calendar days of the Commission meeting, the complainant shall be sent a letter stating the action taken by the Committee and the reason(s) for this action.

- L. **Use of Citizen Participation Plan** - The City of Holland must follow its citizen participation plan.
- M. **Jurisdiction responsibility** - The requirements for citizen participation do not restrict the responsibility or authority of The City of Holland for the development and execution of its consolidated plan.
- N. **Allowance for expedited public comment period and modified procedures** - The following language has been added to the City of Holland Citizen Participation Plan per waiver as permitted by HUD in response to the COVID-19 pandemic:

In the event of a local, state, or national disaster, or when otherwise approved by HUD by waiver, existing and new funding may be allocated or re-allocated in an expedited timeframe. The 30-day minimum for required public comment period shall be waived for substantial amendments. The City shall provide no less than five (5) days for public comment, and provide reasonable notice of opportunity to comment. In each instance in which an expedited timeframe is used, the City shall determine what constitutes reasonable notice and opportunity to comment given the particular circumstances, including using the option of holding remote public hearings in place of in-person hearings when deemed appropriate or necessary.

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[Approved by the City of Holland Neighborhood Improvement Committee, December 20, 2022.]