

# **Citizen Participation Plan**

Updated September 10, 2024

#### BACKGROUND

#### Purpose of Consolidated Plan and Analysis of Impediments to Fair Housing

The City of La Crosse is an entitlement community that receives annual grant funding from the U.S. Department of Housing and Urban Development (HUD), namely through the Community Development Block Grant (CDBG) program and HOME Investment Partnerships Program (HOME). These programs are critical to supporting home rehabilitation efforts, affordable housing development, public facility development and improvement, and other projects that benefit low- and moderate-income persons, prevent or eliminate slums or blight, and/or address urgent threats to community welfare.

The Consolidated Plan and Analysis of Impediments to Fair Housing are required by HUD to continue receiving CDBG and HOME funding. The Consolidated Plan will examine the housing and community development needs of the City, set priorities for the CDBG and HOME funds, outline an Annual Action Plan for meeting current and future needs, and evaluate the City's performance in meeting these annual goals through the Consolidated Annual Performance Evaluation Report (CAPER). The Analysis of Impediments to Fair Housing will further examine current barriers to fair housing access and related contributing factors to achieve comprehensive community development goals.

The following Citizen Participation Plan (CPP) provides a framework by which the City of La Crosse's Consolidated Planning efforts comply with HUD's citizen participation requirements outlined in 24 CFR Part 91.105.

Throughout this CPP, "<u>Federal Reports</u>" will be used to encapsulate the group of documents being drafted through this planning process, since they will be submitted to HUD. These reports include the Consolidated Plan, Action Plan, Analysis of Impediments to Fair Housing, Consolidated Annual Performance Evaluation Report (CAPER), and any Substantial Amendments.

#### Goals of Citizen Participation in the Federal Planning Process

The City of La Crosse recognizes the importance of public participation in defining and understanding current housing, community development, economic development, and fair housing needs, and prioritizing resources to address those needs. This CPP outlines the process by which residents of all ages, genders, economic levels, races, ethnicities, and abilities can become involved in the Consolidated Plan development process.

Public participation is intended to aid the City in needs identification, priority setting, funding allocations, and program recommendations related to the CDBG and HOME programs. Particular emphasis shall be placed on collecting input from the following entities:

- Low-, very low-, and extremely low-income persons, particularly those living in areas where CDBG funds are proposed to be used;
- BIPOC residents of predominantly low-and moderate-income neighborhoods;
- People with limited English proficiency;
- People with disabilities;
- Residents of public and other assisted housing developments;
- Homeless individuals and families, including veterans and youth;
- Public Housing Authorities (PHAs); and
- Local and regional institutions including the La Crosse Housing Authority, the Wisconsin Balance of State Continuum of Care, and other community organizations (e.g. businesses, developers, nonprofit organizations, philanthropic organizations, and community-based and faith-based organizations).

### Public Review of the Citizen Participation Plan

This CPP was made available for public review and comment prior to adoption, in accordance with the public notice, public hearing/meeting and public comment procedures described herein. Any Substantial Amendments to this Citizen Participation Plan will be made available for public review and comment through the same process prior to adoption. This CPP will be available on the City's website at <u>www.cityoflacrosse.org/communitydevelopment</u>. Copies will also be made available to those that do not have internet access at no charge and will be made available in a format accessible to persons with disabilities, upon request.

### Outreach

The City will conduct outreach as necessary to encourage individuals, groups, and organizations identified above to provide input during the Federal Plans development process. Outreach may include:

- Submitting press releases and public hearing notices to the La Crosse Tribune;
- Developing informational materials and flyers to distribute to agencies, as needed;
- Providing email notices to interested parties; and
- Posting notices on the City's website.

### Access to Records

Citizens, public agencies and other interested parties have the opportunity to receive information through public meetings; direct contact with the City of La Crosse Planning, Development & Assessment Department; or via review of draft and final documents at City Hall, the City's website, and the La Crosse Library System. Public hearings are noticed in the La Crosse Tribune and on the City's website.

The jurisdiction will maintain information and records relating to these Federal Reports and use of assistance under the programs covered by the Consolidated Plan for a minimum of five years. Citizens,

public agencies and other interested parties may gain access to such information by contacting the City Planning Department during regular business hours.

### **Technical Assistance**

Technical assistance will be provided to low-, very low-, and extremely low-income groups that request assistance in developing proposals under the Consolidated Plan submission. The Economic & Community Development Commission may, from time to time, deal with issues affecting non-English speaking residents. If any non-English speaking group does not have adequate representation, an independent translator will be hired to translate information at public forums upon request. Contact the City of La Crosse Planning, Development & Assessment Department, City Hall, 400 La Crosse Street, La Crosse, Wisconsin 54601. Telephone number: (608) 789-7512.

# Anti-Displacement Policy

It is unknown if residential displacement will occur as the result of activities identified in the City's Consolidated Plan. However, it is the policy of the City of La Crosse to minimize such activities that might displace residents or businesses. If there is any residential displacement as a result of a City-implemented Consolidated Plan activity or if there is a City-funded Consolidated Plan activity that results in an acquisition by an entity that is not a City agency, the City will conform to the most recently-approved state and federal acquisition and/or relocation regulations.

When it is necessary to displace occupants, whether business or residential, the policy of the City is to assist the displaced persons under the provisions of the Uniform Relocation Assistance and Real Property Acquisition Act of 1970, as amended. The City will include, as eligible project costs, reasonable relocation benefits to any person involuntarily, temporarily or permanently, displaced as the result of Consolidated Plan funded acquisition activities, even if they are not covered by the Uniform Act. The City of La Crosse will also comply with the provisions of Chapter 32 of the Wisconsin Statutes concerning relocation and relocation payments.

Relocation assistance and advisory services will be provided in accordance with the needs of those persons to be displaced including, but not limited to, social service referrals, job counseling referrals, housing referrals and counseling, and transportation to available replacement housing, if necessary.

# **CITIZEN COMMENT**

# **Public Hearings and Comment Periods**

Public hearings will be held periodically throughout the development of these Federal Reports to obtain views of citizens, public agencies, and interested parties, as well as to respond to proposals and comments. At a minimum, the City will hold public hearings for the following purposes before the identified committees:

Public Hearing Topic	Relevant Committee	Comment Period Duration
Annual Action Plan	Economic & Community Development Commission	30 days
Consolidated Plan draft	Economic & Community Development Commission	30 days
Consolidated Plan final document	Finance and Personnel Committee	30 days
Citizen Participation Plan (CPP)	Economic & Community Development Commission	30 days
Analysis of Impediments to Fair Housing	Economic & Community Development Commission	30 days
Substantial Amendments (as needed)	Economic & Community Development Commission	30 days or 5 days*
Submittal of CAPER Report to HUD	Economic & Community Development Commission	15 days

\*See "Disaster or Emergency Events that May Require Expedited Substantial Amendments" section below

Public hearing notices will be posted at least 10 days prior to the scheduled public hearing. Notices will include the date, time and location of the hearing/meeting, as well as a summary of the matter that will be discussed. A contact name and telephone number will be provided to allow interested parties to ask questions or to make requests for special accommodations.

Public hearing notices will be publicized in the La Crosse Tribune, on the City's website at <u>www.cityoflacrosse.org/communitydevelopment</u>, and distributed through the methods outlined in the "Outreach" section of this CPP.

Public hearings will be held in City Hall or virtually through web conference (accessible by phone or through the internet), or at other public facilities as needed.

Translators will be provided for people who do not speak English upon request. Pursuant to the Americans with Disabilities Act of 1990, those in need of an accommodation to participate in the public meeting process shall contact the City Planning Department at (608) 789-7512.

# **Comment Periods**

In conjunction with each public hearing, the public will have the opportunity to submit written comments to the City during the comment period duration specified in the table above. Notice of the opportunity for public comment will be distributed through the methods outlined in the "Outreach" section of this CPP.

A summary of these comments or views and those not accepted, and the reasons therefore, will be included as an appendix to the relevant Federal Plans as applicable.

HUD regulations at 24 CFR Part 91.105 require the City of La Crosse to accept written comments, complaints, concerns or questions regarding all Federal Plans and amendments and revisions of such plans.

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The complaint must contain the following information:

- Name and address of the person(s) filing the comment, complaint, and/or concern;
- A description of the act or acts considered to be in violation;
- Other available pertinent information that will assist in the review and resolution of the comment, complaint, and/or concern.

# AMENDMENTS TO THE FEDERAL PLANS

#### Minor Amendments

Minor Amendments are those that maintain the integrity of the associated Federal Plan and do not include any substantial change in policy or funding priorities while still maintaining flexibility in meeting the goals and objectives. Minor Amendments do not require public consultation and may be implemented following review and final decision by the Community Development Manager. These minor amendments will be identified and incorporated into the City's CAPER at the end of the program year.

#### Substantial Amendments

Substantial Amendments are those that:

- 1. Change the allocation priorities or the method of fund distribution;
- 2. Carry out an activity using funds from any program covered in the Consolidated Plan that was not previously described in the Action Plan;
- 3. Change in the primary purpose of an activity (e.g. a change in a construction project from housing to commercial);
- 4. Change in the scope or location of an activity (e.g. from inside to outside the target area);
- 5. Change in the type or characteristics of persons benefiting from an activity (e.g. household income level, size, race/ethnicity);
- 6. Change in use from one eligible activity to another eligible activity.

Minor adjustments to funding levels for activities described in the Consolidated Plan are not considered substantial.

The public will be notified whenever there is a Substantial Amendment and the public notice and hearing process will be adhered to as described in this CPP to allow for input from citizens, private and public agencies and organizations and other interested parties. All comments will be noted in the amendment and CAPER at the end of the program year.

### Disaster or Emergency Events that May Require Expedited Substantial Amendments

It may be necessary to expedite substantial amendments to the Consolidated Plan in the event of a declared disaster or emergency, for example in the case of a flooding event or pandemic. These expedited substantial amendments may include funding new activities and/or reprogramming of funds, including canceling activities to meet needs resulting from a declared disaster or emergency. Therefore, the City will use CDBG or HOME funds to meet these needs with a 5-day public comment period, instead of a 30-day comment period.

#### **Revisions of Analysis of Impediments to Fair Housing**

The Analysis of Impediments to Fair Housing shall be revised in the event of a significant material change that calls the document into continued validity. Examples of significant material changes in circumstances may include:

- The City is in an area for which the President has declared a disaster under title IV of the Robert T. Stafford Disaster Relief and Emergency Assistance Act that is significant;
- The City has experienced significant demographic changes related to zoning, housing plans or policies or development plans or policies; or
- The City is subject to significant civil rights findings, determinations, Voluntary Compliance Agreements or other settlements.

Revisions and amendments to the Analysis of Impediments to Fair Housing will follow the public notice and hearing process to allow for citizen, private and public agencies and organizations and other interested parties the opportunity to provide comment on the revisions or amendments. Comments will be included in the amendment and the CAPER at the end of the program year.