

**CITY OF SAINT PAUL, MN  
AMENDMENT TO THE CONSOLIDATED PLAN  
CITIZEN PARTICIPATION PROCESS**

In accordance with 24 CFR 91.105 of the Consolidated Submission for Community Planning and Development Programs Final Rule, the City of Saint Paul is amending its Citizen Participation Plan and Process for criteria to be used to determine what changes or actions will be considered substantial amendments to its U.S. Department of Housing & Urban (HUD) funded programs. The City has added the criterion that: A change in the Citizen Participation Plan process to establish expedited procedures to draft, propose, or amended consolidated plans when necessary to expedite or facilitate the use of grant funds as allowed under the CARES Act, will require a substantial amendment to its Consolidated Plan Annual Action Plan. For program years 2019 and 2020 HUD funding, the City will utilize an expedited procedure to amend consolidated plans when necessary to expedite or facilitate the use of grant funds. When utilizing the expedited procedure for this purpose, a public notice will be published in the Pioneer Press with an opportunity to comment of no less than five (5) days; provide citizens with access to action plan amendments and/or amended citizen participation plans, as applicable, on the City's website [<https://www.stpaul.gov/conplan>]; and clearly note that comments can be submitted through e-mail, telephone, or U.S. postal mail post-marked up to the stated date and time in the public notice.

The City, using the expedited process for this amendment to its Citizen Participation Process, will accept comments for the adoption of the revised Citizen Participation Process for program years 2019 and 2020 HUD funding for a period of 5 days from the date of this notice. Written comments may be sent to Ms. Julie Hostak, 1100 City Hall Annex, 25 W. Fourth Street, Saint Paul, MN 55102 or [Julie.Hostak@ci.stpaul.mn.us](mailto:Julie.Hostak@ci.stpaul.mn.us). Persons with questions or who may want to provide oral comments may call Ms. Julie Hostak at (651) 266-8545. Comments submitted through the U.S. mail must be post-marked no later than 5 days after the date of this notice.

## **CITY OF SAINT PAUL CITIZEN PARTICIPATION PROCESS**

### **AMENDED**

### **FOR THE 2018 AND 2019 ANNUAL ACTION PLANS**

The Annual Action Plan is a tool which guides the City of Saint Paul's use of U.S. Housing and Urban Development (HUD) funds each year. The City has adopted the following process in an effort to encourage citizen participation in the Annual Action Plan process.

The City encourages all citizens to participate in the development of the Annual Action Plan (AAP), selection of projects funded under the AAP, any substantial amendments to the Plan, and evaluation of performance measurements. The City specifically encourages participation by persons of low- to moderate-income residing where federal funding is proposed to be used. Contact with social service agencies, advocacy groups, and neighborhood organizations will be used to reach and solicit participation by these groups. In an effort to maximize outreach, there will be multiple points in the AAP process where participation is encouraged.

The most significant citizen participation related to the annual allocation of Community Development Block Grant (CDBG) funds occurs during the Capital Improvement Budget (CIB) process. The CIB committee is comprised of 18 Saint Paul residents representing each of the Minnesota senate districts located in Saint Paul. These residents are charged with hearing project proposal presentations, scoring projects, and offering comments. A public hearing is held during the CIB funding cycle to solicit comments regarding funding selection and priorities prior to the Committee making its formal recommendations. The CIB Committee's recommendations are presented to the Mayor and Council and are the basis for the selection of projects and programs funded with CDBG funds. A copy of the recommendation letter from the CIB Committee to the Mayor is included in the Appendix A with the 2018-2019 CIB schedule.

Note: CIB recommendations were based on the City of Saint Paul receiving the same level of funding from HUD in FY 2019-20 that was received in FY2018-19. The City received \$6,293,101 of Community Development Block Grant (CDBG) funding, \$1,938,350 of HOME Investment Partnerships (HOME) funding, and \$566,521 of Emergency Solutions Grant (ESG) funding from HUD in 2019. In addition, the City estimates using \$556,899 in CDBG program income and has \$1,002,342 in HOME program income in-hand. Total HUD resources estimated to be available is \$10,357,213. Should the City receive funding greater or less than the estimated amount, funding for all CDBG, HOME and ESG activities will be reduced or increased in direct proportion to the difference in the actual allocations received from HUD.

In 2017, the City created a Fair Housing Workgroup committed to Affirmatively Furthering Fair Housing (AFFH). This workgroup participates in the regional Fair Housing Implementation Council. A separate public process was conducted in 2017 to adopt the Addendum to the 2014-2019 Regional Analysis of Impediments to Fair Housing (AI Addendum). Written comments were accepted March 1 – April 3, 2017, and several public meetings were held throughout March. Availability and location of the Analysis of Impediments (AI), AI Addendum and AFFH strategic plan on the City's website is included in the Annual Action Plan. A copy of the City's Anti-

displacement and Relocation Assistance Plan is provided with the published draft and final Annual Action Plan.

The City will publish the draft Annual Action Plan on the City's website and make copies available at every City branch library. A public notice announcing the availability of the 2019 Action Plan with 30-day comment period along with notice of public hearing will be published in the local paper of general distribution. A notification will go out through the City's Emergency Notification System to every District Council asking for review and comments during the comment period. The notice will include the availability, upon request, of language assistance for citizens with limited English proficiency and/or appropriate aids and services leading to effective communication for qualified persons with disabilities. Such appropriate aids and services include qualified sign language interpreters, documents in Braille, and other ways of making information and communications accessible to people who have speech, hearing, or vision impairments. Any comments received will be incorporated into the Plan. Upon completion of the AAP, it will be submitted to City Council for adoption before it is submitted to HUD.

The City of Saint Paul is responsible for carrying out the development and implementation of the AAP. Any person wishing to file a complaint regarding the Consolidated Plan, Annual Action Plan, amendments, and/or performance report may do so in writing to:

City of Saint Paul  
Planning and Economic Development  
Attn: Beth Ulrich  
1100 City Hall Annex  
25 West Fourth Street  
Saint Paul, MN 55102  
beth.ulrich@ci.stpaul.mn.us

For program year 2019, the City shall respond to the complaint within 15 days of receipt of the complaint or within 5 days if the City is using an expedited process. All complaints and responses will be maintained for at least six (6) years. Accommodations and/or alternative filing methods will be allowed for persons with disabilities.

All records regarding the adopted Consolidated Plan, Annual Action Plan, and Substantial Amendments, along with use of funds and performance measurements are retained for a minimum of six (6) years at the above address. All residents or interested parties will be given reasonable access to these records upon request.

#### Substantial Amendments to the Consolidated Plan

In accordance with 24 CFR 91.505, the City of Saint Paul has developed criteria to be used to determine what changes in HUD funding or the City's process of public notification constitutes a substantial amendment, and therefore requires an amendment to the City's Consolidated Plan. These basic criteria, except for the expedited Citizen Participation process, have been incorporated since the City began receiving CDBG program funding, originally included as criteria for amendments to the City's Capital Improvement Budget Program and Process. These criteria

were originally more stringent than federal requirements. The PED Grants Management division of the City of Saint Paul has determined that the following actions will be considered substantial amendments to its HUD-funded programs:

- The addition of a project not described in the Consolidated Plan;
- The cancellation of a project described in the Consolidated Plan;
- An increase in the amount to be expended for a project, if the increase is greater than \$50,000 and also exceeds 25 percent of the amount originally appropriated for the project;
- A change in the location of any public improvement or public facility described in the Consolidated Plan;
- A change in any project that will affect a majority of the intended beneficiaries or a majority of the planned activities.
- A change in the Citizen Participation Plan process, in accordance with 24 CFR §91.105(c), to establish expedited procedures to draft, propose, or amended consolidated plans when necessary to expedite or facilitate the use of grant funds as allowed under the CARES Act.

If a substantial amendment is made for program years prior to 2019, the City will follow all applicable HUD rules, as prescribed in the federal regulations. For program year 2019, the City will utilize an expedited procedure to amend consolidated plans when necessary to expedite or facilitate the use of grant funds. When utilizing the expedited procedure, a public notice will be published in the *Pioneer Press*. This public notice will clearly state: that the expedited procedures are being used; shall include reasonable opportunity to comment of no less than five (5) days; provide citizens with access to action plan amendments and/or amended citizen participation plans, as applicable, on the City's website [<https://www.stpaul.gov/conplan>]; and clearly note that comments will be received through e-mail, telephone, or U.S. postal mail post-marked up to the stated date and time in the public notice. The City may also utilize written comments on the substantial amendment which will be reviewed by City staff, the Mayor, and City Council before the decision to implement the amendment is made.

### Public Hearings

If a public hearing is required and if in-person public hearings are not feasible due to health and safety concerns for citizens, virtual public hearings that provide reasonable notification and access for citizens will be held.