

**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.

# CITIZEN PARTICIPATION PLAN - Amended

CITY OF SAINT PAUL  
1100 CITY HALL ANNEX  
425 WEST FOURTH STREET  
SAINT PAUL, MN 55102



Building community  
wealth through  
business, housing, jobs,  
planning, financial and  
cultural assets.

# City of Saint Paul Citizen Participation Plan

As required by the U.S. Department of Housing and Urban Development (HUD) regulations found at 24 CFR 91.105, this Citizen Participation Plan sets for the City of Saint Paul's policies and procedures for providing citizens and other interested parties with opportunities to participate in an advisory role in the planning, implementation, and evaluation of the Community Development Block Grant (CDBG), HOME Investment Partnerships (HOME), and Emergency Solutions Grant (ESG) programs. The City receives CDBG, HOME, and ESG funds annually from HUD, and these programs are administered through the Department of Planning and Economic Development.

The objective of the CDBG program is the development of viable urban communities by providing decent housing and suitable living environment and expanding economic opportunities. The CDBG program has a focus on low- and moderate-income persons and households earning less than 80% of the Area Median Income, or in predominately low- and moderate-income census tracts. The objective of the HOME program is to provide, develop, support, produce, and expand the supply of decent and affordable housing to serve low- and very low-income persons. The objective of the ESG program is to prevent homelessness and assist those already homeless.

As an entitlement community and recipient of CDBG, HOME, and ESG funds, the City is required to produce the following documents:

1. Consolidated Plan (Con Plan) – a five-year plan that documents the City of Saint Paul's housing and community development needs, outlines strategies to address those needs, and identifies proposed program accomplishments.
2. Annual Action Plan (AAP) – an annual plan that describes specific CDBG, HOME, and ESG projects and programs that will be undertaken over the course of the fiscal year.
3. Consolidated Annual Performance and Evaluation Report (CAPER) – an annual report that evaluates the City's accomplishments and use of CDBG, HOME, and ESG funds.

The primary objectives of the Citizen Participation Plan are to:

1. Encourage citizen participation by all Saint Paul citizens in the development of the Consolidated Plan, Annual Action Plans, and CAPERs, emphasizing the involvement of low- and moderate-income residents, people living in CDBG target neighborhoods, people with disabilities, minorities, non-English speakers, and residents of assisted housing.
2. Give all citizens reasonable and timely access to meetings, information, and records related to the City's CDBG, HOME, and ESG programs.
3. Give all citizens the opportunity to identify and respond to proposed uses of funds.
4. Give all citizens the opportunity to review and comment on program performance.

This Citizen Participation Plan, together with other materials relating to the City's CDBG, HOME, and ESG programs, are available on the City's website (which can be translated) and in alternative formats for persons with disabilities. For information, contact the Department of Planning and Economic Development at 651-266-6575.

## Capital Improvement Budget (CIB) Committee

The Saint Paul Capital Improvement Budget (CIB) process is designed to engage the public in evaluating capital needs in the City. As a part of this process, the CIB Committee, 18 Saint Paul residents representing each of the Minnesota senate districts located in Saint Paul, are involved with the annual allocation of the CDBG funds. 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.

## Public Hearings

The City will hold at least two public hearings each year to obtain citizen's views about housing and community development needs, proposed uses of funds and review of program performance. At least one public hearing will be held to obtain the views of citizens before the Consolidated Plan is published for comment.

The City will ensure adequate public notice before each public hearing, with sufficient information published about the subject of the hearing to facilitate informed comment. Public hearings will be announced online, via the City's Early Notification System, and in the *Pioneer Press*. Public notice will be given at least two weeks before a public hearing or public meeting is held.

The City will hold all public hearings at times and location accessible to potential and actual beneficiaries. Reasonable accommodations will be made for people with disabilities upon advance request. Interpretation services for non-English speaking citizens will be provided at public hearings upon advance request, provided such services are available.

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.

## Development of the Consolidated Plan and Annual Action Plans

The City will make a concerted effort to notify residents, state and local health service providers, social service providers, fair housing organizations, state and local governments, public housing agencies, affordable housing developers, businesses, community and faith based organizations, and other stakeholders of the development of the Consolidated Plan and Annual Action Plans through email, online postings, and public notices in the *Pioneer Press*.

The City will conduct public open houses at convenient times and locations to inform and educate citizens on the development of the Consolidated Plan and Annual Action Plans as well as solicit input for the plans. Reasonable accommodations will be made for people with disabilities upon advance request. Interpretation services for non-English speaking residents will be provided at public hearings upon advance request, provided such services are available. The City also will solicit input from residents and stakeholders through online surveys, phone calls, focus groups, and interviews. Interpretation services for non-English speaking residents at public hearings and public meetings upon advance request, provided such services are available.

The City will also offer to attend a standing District Council Board of Directors or Committee meeting to inform members about the plans, answer questions, and solicit input regarding community needs. The District Councils are resident groups that engage and represent the people living in the district and the Board of Directors and Committees are made up of volunteers elected by the neighborhoods' residents.

The City invites proposals applying for CDBG funding through the CIB process. The CIB Committee hears proposal presentations, score projects, and provide recommendations to the Mayor and Council which are the basis for the selection of projects and programs funded with CDBG funds. The Saint Paul Housing and Redevelopment Authority (HRA) accepts applications for HOME funding, along with other federal and local sources, through an open pipeline process. Applications are reviewed by housing staff for each individual project prior to a funding recommendation. Ramsey County Continuum of Care, in conjunction with Ramsey County and the City, will issue a Request for Proposals (RFP) on an annual basis for projects applying for ESG funding.

The City will publish its draft Consolidated Plan and Annual Action Plans for review and comment on the City's website. The City will publish public notices in the *Pioneer Press* describing the purpose of the Consolidated Plan and Annual Action Plans and listing the locations where the plans may be examined. The Plans will be available for review at the Department of Planning and Economic Development, on its website, and at the Saint Paul Public Library Bookmobile. Posters requesting feedback will be displayed, and written instruction for accessing an online copy will be made available, at all Saint Paul public library branches and the Bookmobile (14 sites in all). Saint Paul public libraries do not require a library card to access public library computers.

Before the City adopts the Consolidated Plan or Annual Action Plans, the City will make available to residents and other interested stakeholders information that includes the amount of funds the City expects to receive and the range of activities that may be undertaken that will benefit low- and moderate-income citizens.

The City will receive and consider written comments on the draft Consolidated Plan and Annual Action Plans for a minimum period of 30 day and shall hold public hearings prior to adopting the final Consolidated Plan and Annual Action Plans and final acceptance by City Council.

#### Substantial Amendments to the Consolidated Plan and Annual Action Plans

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 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, the City will follow all applicable HUD rules, as prescribed in the federal regulations. The City may also utilize an expedited procedure to draft, propose, or amend consolidated plans when necessary to expedite or facilitate the use of grant funds. When utilizing the expedited procedure to draft, propose, or amend consolidated plans for this purpose 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.

#### Consolidated Annual Performance and Evaluation Reports (CAPERs)

The City will prepare a CAPER each year to notify citizens of the accomplishments of the previous program year and the progress made toward meeting the Consolidated Plan goals in accordance with HUD requirements. Citizens will receive notice of the CAPER through online postings and public notices in the *Pioneer Press*. The CAPER will be available for review at the Department of Planning and Economic Development, on its website, and at the Saint Paul Public Library Bookmobile. Posters requesting feedback will be displayed, and written instruction for accessing an online copy will be made available, at all Saint Paul public library branches and the bookmobile (14 sites in all). Saint Paul public libraries do not require a library card to access public library computers. The City will receive and consider comments on the CAPER for 15 days before the public hearing to authorize submission of the report to HUD.

#### Access to Information and Records

Any resident, organization, or other interested party may submit written requests for information regarding the Consolidated Plan, Annual Action Plans and CAPERs, including the City's use of funds under the CDBG, HOME, and ESG programs. This Citizen Participation Plan, the Consolidated Plan, the current Annual Action Plan, the current CAPER, and any substantial amendments to these plans will be available for public review at the Department of Planning and Economic Development and on its website.

#### Comments, Complaints, and Appeals

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

City of Saint Paul

Planning and Economic Development Department  
Beth Ulrich, Grants Manager  
1100 City Hall Annex  
25 West Fourth Street  
Saint Paul, MN 55102  
[beth.ulrich@ci.stpaul.mn.us](mailto:beth.ulrich@ci.stpaul.mn.us)

The City shall respond to the complaint within 15 days of receipt of the complaint or within 5 days when 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.