

CITY OF LYNN, MASSACHUSETTS CITIZEN PARTICIPATION PLAN

A. Preface

The US Department of Housing and Urban Development issued a Final Rule effective February 6, 1995 which provides guidelines for the preparation of local Consolidated Planning submissions. Under this Final Rule, the City of Lynn is required to amend its existing Citizen Participation Plan to comply with the requirements of the new HUD regulations. Accordingly, the City of Lynn hereby adopts this amended Citizen Participation Plan.

B. Introduction

The purpose of this Citizen Participation Plan is to establish the guidelines and process to be utilized by the City of Lynn – acting through the Lynn Housing Authority and Neighborhood Development (LHAND) and the Lynn Office of Economic and Community Development (LOECD) - to ensure broad-based consultation and input in the development of the City's housing and community development policies. The Citizen Participation Plan detailed herein describes a framework for consultation with Lynn residents; public and private agencies, groups and businesses that provide assisted housing, health services, social services, economic development, infrastructure improvements, etc.; State and local health and child welfare agencies; and, to the extent necessary and practicable, other adjacent units of local government.

While the Citizen Participation Plan establishes a framework for involving citizens and the other parties noted above, it is not intended to limit the extent of citizen participation in the development of the City's housing and community development policies and programs. The City is committed to continue working with citizens and agencies from throughout the community in numerous formal and informal ways including a commitment to consultation, which extends beyond the formal requirements of this Plan. The City of Lynn is, therefore, committed to meeting and, to the extent practicable, exceeding the minimum formal requirements detailed herein.

C. Encouragement of Citizen Participation

The City of Lynn is firmly committed to a participatory, community-based system of government - one which provides extensive opportunities for citizens, business owners, service agency representatives and other community leaders to directly influence the shape and direction of municipal government policies and programs. One of the most important components of this citizen participation effort involves the development of housing and community development strategies through the Consolidated Planning process.

The City encourages all of its citizens to directly participate in the formation of local housing and community development policies, in the development of the overall Consolidated Plan/Action Plan document, and in the review of the City's performance in meeting the goals established in

the Consolidated Plan/Action Plan. Further, the City strongly supports and encourages the participation of low and moderate income residents, members of minority groups, persons with disabilities, non-English speaking residents, and residents of public and assisted housing.

Accordingly, the City's outreach and information efforts are designed and will be implemented to reach as many Lynn residents as possible. Public meetings and other informational efforts will be broadly advertised, accessible to persons with disabilities and, where deemed necessary and practicable, allow for bi-lingual translation. The City also encourages residents who have ideas and suggestions to improve accessibility and increase community participation to communicate these suggestions in writing to the Director of the Lynn Housing Authority and Neighborhood Development and/or the Director of the Lynn Office of Economic and Community Development.

D. Standards and Scope of Participation

The City of Lynn, through the Lynn Housing Authority and Neighborhood Development and the Lynn Office of Economic and Community Development, shall continue to provide a process of citizen participation at the community-wide level with regard to the overall Consolidated Plan/Action Plan application and program and shall also provide a process of citizen participation at the neighborhood levels in areas where a significant amount of activity is proposed or ongoing. All aspects of citizen participation shall be conducted in an open manner, with freedom of access for all interested persons.

Citizens' Advisory Board on Community Development

Through the adoption of a formal Citizen Participation Plan on December 11, 1974, by the Mayor and City Council, a general community-wide Advisory Board on Community Development was established that facilitates active participation by citizens. The Board advises the Mayor, through LHAND and LOECD staff, in implementing the Citizen Participation Plan, and makes every effort to encourage citizen participation in the Community Development process. The Board disseminates information and holds public meetings and hearings about the Community Development Block Grant Program, community needs, and proposals to meet those needs. The Board facilitates communication between the public and professional staff, and advises the Mayor, through LHAND and LOECD staff, regarding Community Development needs and program proposals. Board members also provide ongoing communication with their respective City Councilors concerning housing and community development issues. Finally, the Board strives to increase the quality of citizen participation in the Consolidated Planning process.

The Advisory Board on Community Development is formed and serves in the following manner:

- The Mayor appoints seven members to the Board.
- An additional eleven members are appointed, one by each member of the City Council. The term of service of each Board Member is the same as that of the appointing party. In the event of a vacancy on the Board, replacements on the Board are made in the manner prescribed above.

- All members of the Advisory Board on Community Development appointed by the Mayor serve at his/her pleasure. If a member of the City Council wishes to have his/her appointee removed from the Board, the matter comes before the full City Council for a decision.
- The Board elects a Chairperson and Vice Chairperson from among its members to serve a two-year term. Elected Officers may be reelected to serve additional terms if so elected by the Board.
- The Board meets at the call of the Mayor or the Chairperson.

Any member of the Board who misses three (3) consecutive meetings without good cause is automatically removed from the Board.

Responsibilities of the Advisory Board on Community Development include the following:

- To advise the Mayor concerning Community Development and Housing needs in Lynn, and proposed programs to meet those needs including reviewing and providing consultation on the City's Consolidated Plan/Action Plan submission.
- To provide City residents with information concerning Community Development Block Grants, needs, and program proposals including conducting public hearings.
- To conduct two formal public hearings per year as detailed below for the purpose of soliciting citizen input to the Consolidated Plan/Action Plan and reviewing program performance. In addition, the Board shall conduct an additional public hearing to solicit citizen comment in the event that the City proposes to submit a substantial amendment to the Consolidated Plan/Action Plan as defined below.
- To meet in sub-committees as necessary to increase its understanding of Consolidated Plan needs and programs, to prepare materials for distribution to other citizens, to plan for public meetings, and to prepare reports to the Mayor.
- To advise the Mayor as required concerning Consolidated Plan/Action Plan program applications, substantial amendments, revisions, reallocations of funds and designation of new activities or locations.
- To otherwise facilitate involvement and participation of the citizens of Lynn.

The Advisory Board meets to discuss current issues concerning Community Development and Housing, including the Consolidated Plan/Action Plan. These meetings provide the opportunity for the Board to offer their opinions and advice concerning Community Development and Housing activities and the form and content of the Consolidated Plan/Action Plan. During these meetings, the Board is informed of upcoming matters of importance. At various times, sub-committees are formed and meetings are held in order to address issues that require special attention.

Information on technical program requirements shall be provided to the Citizens' Advisory Board, groups of low and moderate income persons, and residents in blighted neighborhoods by OECD and LHAND staff throughout the year at such times when needed or requested. The level and type of technical assistance shall be determined by the OECD and LHAND on an individual basis upon consideration of varying needs and requests.

Neighborhood Level Citizen Participation

The City of Lynn, through the Lynn Housing Authority and Neighborhood Development and the Lynn Office of Economic and Community Development shall provide for and encourage citizen participation, with particular emphasis on participation by persons of low and moderate income who are residents of slum and blighted areas and of areas in which funds are proposed to be used, persons with disabilities, residents of public and assisted housing and minority citizens. As previously noted, the City intends to maximize the opportunity for citizens to become involved in shaping housing and community development policies, in developing the Consolidated Plan/Action Plan, and in monitoring program performance. Specific opportunities for citizen participation at the neighborhood level will include:

- Individuals can register for housing programs at LHAND's administrative offices, which are located at 10 Church Street and are handicapped accessible. Periodic speaking engagements are scheduled by LHAND and LOECD staff to inform and receive comments from neighborhood residents.
- As needed and/or requested, meetings will be held with various neighborhood groups including social service agencies, business and civic organizations, minority groups, low and moderate income residents, residents of public and assisted housing, and persons with disabilities. Public meetings shall be conducted in settings consistent with the requirements of Section 504. Where necessary and practicable, the City shall endeavor to provide or facilitate the provision of translation services.

In implementing these processes of citizen participation, the City shall make reasonable efforts to ensure access to citizens or citizen organizations throughout all stages of the program. Citizens shall be provided with reasonable and timely access to local meetings, information, and records relating to the grantee's proposed use of funds, as required by the regulations of the secretary, and to the actual use of funds. LHAND and LOECD staff shall provide reasonable levels of technical assistance to those eligible groups who request assistance in developing program proposals for consideration as part of the annual Consolidated Plan process.

LHAND and LOECD staff shall consult as needed with the State and local Departments of Public Health and with local child welfare agencies in the development of lead based paint policies.

LHAND and LOECD staff shall consult with the Metropolitan Area Planning Council and other local governments to the extent practicable and necessary to develop coordinated housing and community development policies and programs.

E. Complaints

Citizens, particularly low and moderate income persons and residents of blighted neighborhoods, are encouraged to submit their views and proposals regarding the Community Development Program in Lynn.

LHAND or LOECD staff shall respond to all written comments, complaints, and grievances as needed, in a timely and responsive manner. Staff will make every reasonable effort to provide responses, in writing, within fifteen (15) working days from the receipt of said written inquiring or complaint.

F. Public Hearings

The City of Lynn shall provide for two formal public hearings to obtain citizen views and to respond to proposals and questions at different stages of the Consolidated Plan process, including at least the development of needs, the review of proposed activities, and review of program performance, which hearings shall be held after adequate notice, at times and locations convenient to potential or actual beneficiaries, and with accommodation for persons with disabilities and, as necessary and practicable, non-English speaking residents. Said hearing shall be conducted by the City's Citizen Advisory Board.

Bilingual Assistance

Wherever a significant number of low and moderate income persons and residents of blighted neighborhoods speak and read a primary language other than English, where practicable and necessary, bilingual assistance shall be offered at required public hearings. Spanish and Bengali are the most common minority languages in Lynn.

Pre-Submission and Performance Review Hearings

LHAND and LOECD shall coordinate formal pre-submission hearings: 1) to obtain views and proposals of citizens at the initial stage of application development and to review and report on past program performance, and 2) to obtain views of citizens on the proposed application before its submission to HUD for funding. Through these hearings, citizens will be provided an opportunity to assess and submit comments on the proposed Consolidated Plan Program.

1. Pre-submission Hearing/Application Development and Performance Review

At the time of the initial planning stages for the City's Consolidated Plan/Action Plan application development, a public hearing shall be coordinated by the Citizens Advisory Board at a central location, accessible to people with disabilities, to hear proposals on community development and housing needs and priorities, and to report on past performance. "A Notice of Submission of the Grantee Performance Report to all Interested Agencies, Groups and Persons" is published in newspapers of local circulation at the end of the fiscal year and a copy of the relevant

performance reports are kept on file in the Office of Economic and Community Development for inspection by the public.

LHAND and LOECD will ensure that the following information be made available to citizens:

- The total amount of Community Development Block Grant funds available to the applicant for community development and housing activities, including planning and administrative activities.
- The range of activities that may be undertaken with these funds and the kind of activities previously funded in the community.
- The estimated amount of those funds proposed to be used for activities which will benefit low and moderate income persons.
- Proposed activities likely to result in displacement and the City's plans to minimize displacement of persons as a result of the proposed activities.
- The types and levels of assistance the City will make available to persons displaced by funded activities, even if no such displacement is expect to occur.
- The processes to be followed in drawing up and approving the local application and the schedule of meetings and hearings.
- The role of citizens in the program as provided under this section, and
- A summary of other important program requirements.

LHAND and LOECD staff shall provide technical assistance to groups, representative of persons of low and moderate income, that request such assistance in developing proposals, with the level and type of assistance to be determined by the grantee.

A Notice of Public Hearing for purposes of reporting on past performance and soliciting citizen input at the application development stage shall be published in newspapers of local circulation at least ten days prior to the date of the hearing. Citizens shall be afforded a fifteen (15) day period to comment on the City's proposed performance report. The City shall consider all citizen comments and shall attach a summary of said comments to the performance report submitted to HUD.

2. Pre-submission Hearing - Proposed Application

Prior to submission of the Consolidated Plan/Action Plan to HUD, the City shall prepare and publish a proposed plan for citizen review and comment. Upon publication of the proposed plan, the Citizen Advisory Board shall coordinate a second formal public hearing for the purpose of soliciting citizen comments on the City's proposed Consolidated Plan/Action Plan. The Public Hearing shall be scheduled and coordinated by the Citizen Advisory Board to allow the public to review the content of the City's proposed plan and to submit comments regarding the proposed plan.

The Notice of Public Hearing shall be published in newspapers of local circulation approximately ten days prior to date of the public hearing. As part of this Notice, the City shall publish a summary of the proposed annual plan in at least one newspaper of local general circulation which

identifies the total proposed amount of funding in each of the major program categories (CDBG, HOME, ESG, and HOPWA). The Notice shall also indicate the location(s) where citizens may examine a copy of the entire proposed plan. In addition, the City shall provide a reasonable number of free copies of the proposed plan to citizens and groups that request it.

Citizens shall be afforded a thirty (30) day period to review and comment on the proposed plan which shall commence upon publication of the Notice of Public Hearing. Upon completion of the thirty day public review period, final recommendations shall be submitted to the Mayor by LHAND and LOECD for approval. Upon the Mayor's approval, the final plan shall be submitted to the US Department of Housing and Urban Development for approval. Copies of the final approved plan shall be made available to the public for examination upon request.

3. Additional Hearings - Substantial Amendment

The City anticipates that, in certain circumstances, the Action Plan may require amendments to meet the City's housing and community development needs. In those instances where a substantial amendment is proposed by the City, the Citizen Advisory Board shall coordinate a public hearing to allow for public review and comment on the proposed substantial amendment. A substantial amendment shall be defined as a proposed change to the Action Plan which represents twenty-five percent (25%) or greater of the total annual plan budget. The Citizen Advisory Board shall publish a Notice of Public Hearing to review the proposed substantial amendment at least ten days prior to the date of the hearing. Said Notice shall be published in at least one newspaper of local general circulation. Said Notice shall specify the nature of the proposed substantial amendment and shall indicate the locations where citizens may examine a complete copy of the proposed substantial amendment. The public shall be afforded a thirty (30) day period to review and comment on the proposed substantial amendment which shall commence upon publication of the Notice. Upon completion of the thirty (30) day public comment period, the Citizens Advisory Board shall submit its recommendation to the Mayor through LHAND and LOECD.