

CITY OF MALDEN

CITIZEN PARTICIPATION PLAN

24 CFR Part 91.105

(a)(1)

In January of 2018, the City of Malden amended its Citizen Participation Plan to comply with new provisions as outlined in Title 24, Part 91 of the Code of Federal Regulations (91.105). The City amended the original CPP to meet requirements of the Assessment of Fair Housing. These new regulations set forth submission requirements for Community Planning and Development Programs; specifically for the use of Community Development Block Grant (CDBG) and HOME Investment Partnerships (HOME) Programs, as well as when preparing an Assessment of Fair Housing (AFH). This Citizen Participation Plan meets the requirements noted at 24 CFR Part 91.05 and shall be made available to the public.

(a)(2) Encouragement of Citizen Participation

The City of Malden, an eligible grantee under Section 106(a) of the Housing and Community Development Act of 1974, as amended, is required to follow a Citizen Participation Plan. It is the city's intent to encourage public participation in the development of the Assessment of Fair Housing (AFH), any revisions to the AFH, the consolidated plan, any substantial amendments to the consolidated plan or one year action plan and the annual performance report (CAPER).

Participation is especially encouraged by low and moderate income residents in neighborhoods identified by the U. S. Census as predominantly low/mod income or special census tabulations prepared for HUD referred to as Low-Mod Income Summary Data (LMISD). Further, the city advocates participation by its minorities, non-English speaking population and persons with disabilities by working with the city's Affirmative Action/Equal Opportunity officer, the Human Service Department, the Human Rights Commission, the Immigrant Learning Center, the Disability Issues Commission and other organizations best able to communicate with these residents.

In addition, the City encourages, in conjunction with consultation of the public housing agencies, the participation of residents of public and assisted housing development in the process of developing and implementing the AFH and the consolidated plan. When, and if, the City and the Housing Authority for the City of Malden do enter into an interlocal agreement for the development of a AFH, the City shall make an effort to provide information to the Public Housing Authority regarding the AFH, the Affirmatively Furthering Fair Housing (AFFH) strategy and consolidated plan activities related to its developments so that the PHA can make this information available at the annual public hearing(s) required for the PHA Plan.

(a)(3) Comment on Citizen Participation Plan and Amendments

The city makes its Citizen Participation Plan available at all public hearings and anticipates mid-April publication date for comment on the Consolidated Plan or Action Plan. Copies of the CP plan will be made available to all city commissions, the Planning Board, the Human Service Department

and the Malden Housing Authority. The plan will be made available in an appropriate format for those residents with certain disabilities upon request.

(a)(4) Assessing Language Needs

The City, in an effort to ensure meaningful access to participation by non-English speaking residents, shall take reasonable steps to provide language assistance. When appropriate and requested, staff members will be available to request translation services. With at least three days' notice, translation services will be sought for non-English speaking persons. Persons requiring materials in a language other than English should contact the Malden Redevelopment Authority at (781) 324-5720.

(b)(1) Development of the Consolidated Plan

The city has made available to its citizens, public agencies and interested parties, information that includes the amount of assistance the city expects to receive including grant funds and program income and the range of activities that are scheduled to be undertaken including the estimated amount that will benefit persons of low and moderate income. Displacement of both residents and businesses is also addressed. Although the City expects no displacement to occur, in order to minimize displacement of persons and to assist any persons displaced, the Residential Anti-Displacement and Relocation Plan will be followed.

Before the City adopts a consolidated plan, the City will make available to residents, public agencies, and other interested parties information that includes the amount of assistance the jurisdiction 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 will publish the required information in one or more public notices in newspaper(s) of general circulation and/or will post a notice on the City's website as a means to meet this requirement.

The City may opt to make the HUD-provided data available to the public by cross-referencing the data on HUD's Web site or by announcing the availability of the information in a public notice. HUD-provided data will be posted and/or published no later than 45-days before the submission of the Assessment of Fair Housing is due at HUD. Further, the City will publish the information required in §91.105 (b)(ii) in one or more public notices and/or will post a notice on the City's website as a means to meet the requirement.

The City's citizen participation plan must include the following minimum requirements for the development of the AFH and the consolidated plan:

(b)(2) Publication

The Citizen Participation Plan requires the city to publish the proposed AFH and/or Consolidated Plan by notice in the local newspapers. Citizens are afforded opportunity to examine said plan during regular hours at the Malden Redevelopment Authority during a Comment Period. A reasonable number of copies will be made available for review at the MRA office and upon request; copies will be provided per resident or group.

(b)(3) Development Stage Public Hearings

The Citizen Participation Plan provides for at least one "input" public hearing during the development stage of the AFH and/or Consolidated Plan. The city conducts two (2) public hearings for public input for the Annual Action Plan typically in late January and/or February.

(b)(4) Thirty Day Comment Period

An advertised period of at least 30 days is required by the Citizens Participation Plan for the public to review and comment on the draft plan. The period is typically from April 12 to May 12. Midway in the public comment period, a public hearing will be advertised for the purpose of taking verbal or written public comment and answering questions regarding the "draft" Consolidated Plan.

(b)(5) Consideration of Public Comments

The city will consider any comments or views of residents of the community received in writing, or orally at the public hearings, in preparing the final AFH or the final consolidated plan (as applicable). A summary of these comments or views, and a summary of any comments or views not accepted and the reasons why, shall be attached to the final AFH or the final consolidated plan (as applicable).

(c)(1) Criteria for Amendments to Consolidated Plan

"Substantial amendments" are defined as lump-sum changes involving more than twenty percent of the annual entitlement for the program year or changes involving more than twenty percent of any individual program category. A change in the way funds are distributed would constitute a policy change and therefore be classified as a "substantial amendment".

The city will use the following criteria to determine when revisions to the AFH will be required:

- A material change occurs in which the circumstances affects the information on which the AFH is based to the extent that the analysis, the fair housing contributing factors, or the priorities and goals of the AFH no longer reflect actual circumstances.
- Upon HUD's written notification specifying a material change that requires the revision.

Should a revision be necessary, the timeframe and methods of the revision shall comply with the requirements found at §5.164.

(c)(2) Opportunity for Comment

The city will provide its citizens a reasonable opportunity to comment on the draft Consolidated Plan, AFH and on any amendments to said Plans by making the plan public. The full Consolidated Plan will be noticed in the newspaper and to certain government bodies, both upon its completion and upon its substantial amendment. The City will provide a period of not less than 30 calendar days to receive comments on the consolidated plan substantial amendment or any revision to the AFH

before the consolidated plan substantial amendment is implemented or the revised AFH is submitted to HUD for review

(c)(3) Comments

Any comment, written or oral, shall be considered in preparing the Consolidated Plan and/or AFH. A summary of these comments or views, and a summary of any comments or views not accepted and the reasons why, shall be attached to the substantial amendment of the consolidated plan or revision to the AFH (as applicable).

(d)(1) Performance Reports

The residents of the City of Malden shall be provided with reasonable notice and an opportunity to comment on performance reports. A newspaper advertisement and posted notices will appear not less than 15 days before required submission to HUD.

(d)(2) Comments

Any comment, written or oral, shall be considered in the preparation of performance reports. A summary of these comments or views whether accepted or not together with reasons therefore shall be attached to the performance report.

(e)(1)(2) Public Hearings and Notice Thereof

The city shall provide for a minimum of two public hearings per year to obtain residents' 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 will address housing and community development needs, development of proposed activities, proposed strategies and actions for affirmatively furthering fair housing consistent with the AFH, and a review of program performance. At least one separate public hearing should be held before the proposed AFH is published for comment in order to obtain the views of the community on AFH-related data and affirmatively furthering fair housing in the jurisdiction's housing and community development programs.

The city will hold at least one of the two hearings before the proposed consolidated plan is published for comment in order to obtain the views of residents of the community on housing and community development needs, including priority non-housing community development needs and affirmatively furthering fair housing.

Although HUD does not specify the length of notice required, the regulations stated HUD considers two weeks adequate. As such, the City will publish notices in newspapers at least two weeks before said hearings. Along with date, time and location, this notice will include sufficient information about the subject of the hearing.

(e)(3) Public Hearings Times/Locations

All public hearings have been held or are scheduled to be held in the evening and at locations that are handicapped accessible. Consolidated and AFH Plan hearings were held generally in low/mod income neighborhood locations.

(e)(4) Non-English Speaking Participation

Malden is predominantly English speaking and hearings were conducted in English. There are, however, some 34 different languages spoken within the community according to a survey completed by the School Department. Upon request, the city is prepared to offer "translations" in cooperation with its Affirmative Action office, Human Service Department, School Department and any other local organizations that may be of assistance on this matter.

(f) Meetings

The City will provide residents of the community with reasonable and timely access to local meetings, consistent with accessibility and reasonable accommodation requirements, in accordance with section 504 of the Rehabilitation Act of 1973 and the regulations at 24 CFR part 8; and the Americans with Disabilities Act and the regulations at 28 CFR parts 35 and 36, as applicable.

(g) Availability to the Public

The Citizens Participation Plan provides that the Consolidation Plan, Annual Action Plan, substantial amendments HUD-accepted AFH, revisions to the AFH, and the performance report will be available to the public, including availability of materials in a form accessible to persons with disabilities, upon request. Depending on the time of year, the adopted/approved plan may be available for download at either the City of Malden website www.cityofmalden.org or the Malden Redevelopment Authority website www.maldenredevelopment.com

(h) Access to Records

When requested, the City will provide residents of the community, public agencies, and other interested parties with reasonable and timely access to information and records relating to the jurisdiction's AFH, consolidated plan, performance reports and use of assistance under the programs covered by this part during the preceding 5 years.

(i) Technical Assistance

The City will provide technical assistance to groups representing persons of low- and moderate-income that request such assistance in commenting on the AFH and in developing proposals for funding assistance under any of the programs covered by the consolidated plan.

The level and type of assistance shall be determined by the City; however, the City strongly encourages all potential applicants for funding to contact City staff before completing an application/proposal for funding. In public notices for CDBG and HOME Program participation, invitation is made for all interested parties to contact the Director of Community Development at the

Malden Redevelopment Authority for technical assistance in developing their proposals. This policy is in effect during the entire program year.

(j) Comments and Complaints

The city shall consider any comments or views of citizens and/or organizations received either in writing or orally at public hearings, in preparing the final Consolidated Plan, amendments to the Plan or performance reports. A summary of these comments whether accepted or not together with reasons therefore, will be attached to the final Consolidated Plan, amendment or performance report, whichever is appropriate.

The city will provide a timely, substantive written response to every written citizen complaint within 15 working days from receipt of such complaint. Citizens with complaints about aspect of any program activity are encouraged to telephone the Director of Community Development so that the complaint can be addressed as soon as possible.

(k) Use of Citizen Participation Plan

The City of Malden shall follow its Citizen Participation Plan upon its formal adoption.

(l) Responsibility

The requirements for citizen participation do not restrict the responsibility or authority of the City of Malden for the development and execution of its Consolidated Plan or AFH.

NORTH SUBURBAN CONSORTIUM

CITIZEN PARTICIPATION PLAN

91.105

(a)(1)

The North Suburban Consortium (NSC) hereby agrees to comply with all provisions as outlined in Title 24, Part 91 of the Code of Federal Regulations 91.401 and 91.105 outlining regulations with regard to a Citizen Participation Plan. These new regulations set forth submission requirements for Community Planning and Development Programs.

(a)(2) Encouragement of Citizen Participation

The North Suburban Consortium comprised of the communities of Malden, Medford, Melrose, Arlington, Chelsea, Revere, Everett, and Winthrop are required to follow a Citizen Participation Plan in accordance with the CFR regulations in paragraph (a)(1). It is the jurisdiction's intent to encourage citizens to participate in the development of the Consolidated Plan, any "substantial amendments" and the performance report.

Participation is especially encouraged by low and moderate income residents. Further, NSC advocates participation by its minorities, non-English speaking population and persons with disabilities by working with the appropriate city/town departments and/or organizations best able to communicate with these residents.

Participation is urged by residents at all Housing Authoritys (HA) by posting notices, authoring newsletter articles and holding public hearings at some of the HA community centers. Information about Consolidated Plan activities has been made available to all Housing Authoritys for the purpose of annual public hearings required under the Comprehensive Grant Program.

(a)(3) Comment on Citizen Participation Plan Amendments

Publication of the Consolidated Plan is anticipated in mid-April for comment on the Consolidated Plan of which the Citizen Participation Plan is a part. Copies of the plan will be made available to all city commissions, Planning Boards, Human Service Departments and Housing Authoritys. The plan will be made available in an appropriate format for those residents with certain disabilities.

(b)(1) Development of the Consolidated Plan

The Consortium has made available to its citizens, public agencies and interested parties, information that includes the amount of assistance the jurisdiction expects to receive including grant funds and program income and the range of activities that are scheduled to be undertaken including the estimated amount that will benefit persons of low and moderate income. Displacement of both residents and businesses was addressed.

(b)(2) Publication

The Citizen Participation Plan requires NSC to publish the proposed Consolidated Plan by notice in local newspapers of general circulation. Citizens will be afforded an opportunity to examine said plan during regular hours at locations in every NSC member community during this 30 day Comment Period. A reasonable number of copies will be made available for review.

(b)(3) Development Stage Public Hearing

The Citizen Participation Plan provides for at least one "input" public hearing during the development stage of the Consolidated Plan. A public hearing for public input is generally conducted in Malden in February that is advertised jurisdiction-wide. This jurisdiction-wide public hearing shall not preclude other public hearings addressing similar issues scheduled in individual NSC member communities.

(b)(4) Thirty Day Comment Period

An advertised period of at least 30 days is required by the Citizens Participation Plan for the public to review and comment on the draft plan. The period is typically from April 12 to May 12. Midway in the public comment period, a public hearing will be advertised jurisdiction-wide for the purpose of taking public comment and answering questions regarding the "draft" Consolidated Plan.

(b)(5) Consideration of Public Comments

NSC will consider all comments whether in writing or verbal in the preparation of the final plan. A summary of all comments received and their effect on the plan shall be attached to the final document.

(c)(1) Criteria for Amendments to Consolidated Plan

"Substantial amendments" are defined as lump-sum changes involving more than twenty percent of the total budget for the program year or changes involving more than twenty percent of any individual program category. A change in the way funds are distributed would constitute a policy change and therefore be classified as a "substantial amendment".

(c)(2) Opportunity for Comment

NSC will provide its citizens a reasonable opportunity to comment on the draft Citizen Participation Plan and on any amendments to the final Citizen Participation Plan by making the plan public. The full Consolidated Plan, of which the Citizen Participation Plan is a part, will be noticed in the newspaper and to certain government bodies, both upon its completion and upon its substantial amendment.

(c)(3) Comments

Any comment, written or oral, shall be considered in preparing the Consolidated Plan. A summary of these comments or views whether accepted or not together with reasons therefore shall be attached to the substantial amendment of the Consolidated Plan.

(d)(1) Performance Reports

The residents of the NSC jurisdiction shall be provided with reasonable notice and an opportunity to comment on performance reports. A newspaper advertisement and posted notices will appear not less than 15 days before required submission to HUD.

(d)(2) Comments

Any comment, written or oral, shall be considered in the preparation of performance reports. A summary of these comments or views whether accepted or not together with reasons therefore shall be attached to the performance report.

(e)(1)(2) Public Hearings and Notice Thereof

At least two public hearings are required per year to obtain citizens' views and to respond to proposals and questions. These public hearings shall occur at two different stages of the program year. The hearings shall address housing and community development needs, development of proposed activities and review of program performance. To obtain the views of NSC residents on housing and community development needs, including priority non-housing community development needs, the Citizen Participation Plan provides that at least one of these hearings is held before the proposed Consolidation Plan is published for comment.

Two jurisdiction-wide public hearings are typically scheduled every year. In addition, numerous public hearings within each member community are conducted. The first public hearing generally occurs in early February to receive input and obtain citizens' views on the Consortium's Consolidated Plan. This public hearing is advertised two weeks prior in all eight communities comprising the North Suburban Consortium. A second public hearing is scheduled midway in the 30 day public comment period. This public hearing takes comment on the Consortium's Consolidated Plan and will be advertised two weeks prior in newspapers of general circulation within the NSC jurisdiction.

(e)(3) Public Hearings Times/Locations

All public hearings are scheduled to be held in the evening to ensure maximum participation and at locations that are handicapped accessible.

(e)(4) Non-English Speaking Participation

The NSC jurisdiction is predominantly English speaking and hearings are conducted in English. There are, however, more than 35 different languages spoken within the jurisdiction according to the U. S. Census. Upon request, NSC is prepared to offer "translations" in cooperation with appropriate city/town departments and any other local organizations that may be of assistance in this matter.

(f) Meetings

The Citizens Participation Plan shall provide residents of the NSC jurisdiction reasonable and timely access to local meetings.

(g) Availability to the Public

The Citizens Participation Plan provides that the Consolidation Plan as adopted, substantial amendments and the performance report will be available to the public, including availability of materials in a form accessible to persons with disabilities, upon request.

(h) Access to Records

NSC member communities will provide for full and timely disclosure of its program records and information consistent with applicable state and local law regarding personal privacy and obligations of confidentiality.

(i) Technical Assistance

Technical assistance for development of proposals for the different programs within the jurisdiction is available upon request at all Planning and Community Development Offices located in the city/town halls of each NSC member. This policy is in effect during the entire program year.

(j) Comments and Complaints

NSC shall consider any comments or views of citizens and/or organizations received either in writing or orally at public hearings, in preparing the final Consolidated Plan, amendments to the Plan or performance reports. A summary of these comments whether accepted or not together with reasons therefore, will be attached to the final Consolidated Plan, amendment or performance report, whichever is appropriate.

NSC will provide a timely, substantive written response to every written citizen complaint within 15 working days from receipt of such complaint. Citizens with complaints about aspect of any program activity are encouraged to telephone the Director of Planning/Community Development or his/her designee in each member community so that the complaint can be addressed as soon as possible.

(k) Use of Citizen Participation Plan

NSC shall follow its Citizen Participation Plan.

(l) Responsibility

The requirements for citizen participation do not restrict the responsibility or authority of each member community for the development and execution of its Consolidated Plan.