



**CITIZEN PARTICIPATION
PLAN**

**Housing and Urban Development
Community Development Block Grant Program**

**City of Rock Island
Community Economic Development Department**

Adopted June 2004
Amended August 2011
Amended December 2017
Adopted March 26, 2018
Amended May 11, 2020

THE CITIZEN PARTICIPATION PLAN PROCESS

INTRODUCTION

The City of Rock Island is required by the Housing and Urban Development Department to develop and follow a Citizen Participation Plan for the Community Development Block Grant Program administered by the city. The Citizen Participation Plan must provide for and encourage citizen participation and consultation in the development, revisions, implementation, and amendments to the city's five year Consolidated Plan (Con Plan), the Assessment of Fair Housing (AFH), the Annual Action Plan (AAP), the Consolidated Annual Performance Evaluation Report (CAPER) and Section 108 Guaranteed Loan projects. The purpose of this Citizen Participation Plan is to outline and define the citizen participation process. This Citizen Participation Plan has been drafted in accordance with 24 CFR 91.105 Citizen Participation Plan for local governments.

PURPOSE OF CITIZEN PARTICIPATION PLAN

This amended Citizen Participation Plan (CPP) sets forth the City's policies and procedures for citizen participation as it pertains to the development and implementation of the city's five year consolidated plan (con plan) and the Assessment to Fair Housing (AFH). This document further outlines the steps and actions that the city will take to involve citizens in the planning and decision making process for the implementation of federally funded programs, projects and activities. Additionally, this CPP discusses how the city will report on the activities carried out through the con plan and annual action plans (AAP).

ENCOURAGEMENT OF CITIZEN PARTICIPATION

The CPP is designed to gain input from the residents of Rock Island and interested stakeholders. The Final Rule under 91.105(a)(2)(i) through (iii) for local governments requires that the CPP must encourage citizens to participate in the development of the AFH and any revisions or amendments made to the AFH in the same manner that the city encourages citizen participation in the development of the con plan, Substantial Amendments, AAP, CAPER and Section 108 Guaranteed Loan projects. The citizen participation process must include the groups identified below to assist in the development and implementation of all plans and reports. As such, the City of Rock Island will reach out to the citizens and identified stakeholders that are included as part of the categories below in the following ways:

- Residents of predominately low income neighborhoods
The city will coordinate with the Community Caring Conference to schedule and conduct public meetings in designated locations in neighborhoods that have low to moderate income populations of 51% or higher.
- Very low, low, and moderate income residents
The city will coordinate with the representative ward alderman to coordinate meetings to encourage public participation.
- Minorities
The city will host a public meeting at the Martin Luther King Center and run ads on the Quad City Community Broadcasting Group (WGVV) radio station notifying citizens of upcoming meetings and input opportunities.
- Non-English speaking residents
The city will follow and implement the policies and procedures outlined in the adopted Language Assistance Plan (please see attached)
- Persons with disabilities

The city will work with the ARC and the Augustana Public Radio Information Service (APRIS) to reach and inform disabled populations regarding public meeting dates, times, and meeting locations. The city will ensure that all meeting locations are accessible to those with disabilities

- Residents of designated revitalization and or blighted areas
The city does not currently have any designated revitalization areas.
- Residents of areas where CDBG funds are proposed to be used
The city will hold public information meetings in any area where a proposed project is planned.
- Residents of public and housing developments, including resident advisory boards or councils and resident management corporations.
The city will coordinate meeting information with Housing Authority representatives.

The city will also reach out to local and regional institutions, Continuum of Care providers, businesses and developers, public, private, and non-profit organizations, including philanthropic, neighborhood, community-based and faith-based organizations. Additionally, the city will consult with broadband internet service providers, organizations engaged in narrowing the digital divide, agencies whose primary responsibilities include the management of flood prone areas, public land or water resources, and emergency management agencies. The city will accomplish this through the creation and implementation of a comprehensive data base that is updated on an annual basis to ensure that all interested parties are notified of meetings and actions that affect the AFH and con plan as well as the APP and substantial amendments. The city will contact all interested parties through electronic communication, postcards with meeting information, and through the local newspaper.

CITIZEN PARTICIPATION PLAN RELEASE, COMMENT AND AMENDMENT PROCESS

CPP Release and Availability

City of Rock Island staff will prepare the draft Citizen Participation Plan and present it to the public and identified stakeholders for review and comment. Notification of plan availability will be made through a public notice published in the most widely read local newspaper one week (seven days) prior to the release of the plan.

The draft CPP will be available in the following locations:

- City of Rock Island Community Economic Development, 1528 Third Avenue, Rock Island, IL 61201
- Martin Luther King Community Center, 630 Martin Luther King Drive, Rock Island, IL 61201
- Rock Island Public Library, 401 19th St, Rock Island, IL 61201

Please note that Non-English speaking residents and sight-impaired individuals may call (309) 732-2900 to make accommodations.

The plan will also be posted on the city's website, www.rigov.org, and can be downloaded. The city will also host two public meetings to present the CPP, answer questions, and receive input and comments regarding the CPP. The meetings will also serve to establish the citizen participation process for the diverse groups within Rock Island based on the comments and input received.

Submission of Comments

Residents and identified stakeholders will have thirty (30) calendar days to review and submit comments regarding the actions and content of the CPP. Certain language and content within the CPP are required by HUD as dictated in the Final Rule 24 CFR Part 5 to be included in the CPP, especially regarding the Assessment to Fair Housing process.

Residents and stakeholders shall submit comments in writing to “Citizen Comments on the Citizen Participation Plan,” Community and Economic Development, City of Rock Island 1528 Third Avenue, Rock Island, IL 61201 by the review deadline. All comments will be assessed and a public hearing will be held to discuss the CPP and the comments received. The city will conduct a public hearing regarding the CPP and request that the Rock Island City Council adopt the Citizen Participation Plan.

THE CONSOLIDATED PLAN and ASSESSMENT OF FAIR HOUSING

As part of the citizen participation process for the development of the Assessment to Fair Housing and the city’s five (5) year con plan the city will make available to Rock Island residents and stakeholders all HUD provided data and supplemental information that will be used in the development of the AFH and con plan. All of the data will be available to access on the city’s website and in hard copy at the following location: Community and Economic Development, City of Rock Island 1528 Third Avenue, Rock Island, IL 61201.

Prior to the focus group meetings, the city will publish information regarding the estimated amount of federal assistance that the city expects to receive from all HUD sources in a five year period and a list of projects and activities that may be undertaken. The city will also provide information regarding the amount to benefit low and moderate income residents. If any project undertaken by the city results in the residential displacement of persons the following steps will be taken to relocate the affected parties (Pages 8 – 9 of this Plan).

As part of the planning process and in accordance with section 504 of the rehabilitation Act of 1973 and the regulations in 24 CFR part 8; and the Americans with Disabilities Act and the regulations at 28 CFR parts 35 and 36 as applicable, the city will conduct focus groups in locations throughout the city in an effort to compile information regarding resident and stakeholder opinions and assessments of the city’s needs regarding access to affordable housing, community development needs, including priority non-housing community development needs and affirmatively furthering fair housing to address access to safe and affordable housing and other project needs that are identified through the focus group process. The data gathered at these focus groups will be used to complete the AFH and five year con plan.

The city shall hold the first of two public hearings prior to the release of the draft AFH and con plan. The hearing will address housing and community development needs, development of proposed activities, proposed strategies and actions for affirmatively furthering fair housing consistent with the HUD AFH and con plan guidelines and regulations.

When the draft AFH and con plan’s have been completed the city will present both documents to residents and identified stakeholders for review and comment. Notification of plan availability will be made through a public notice published in the most widely read local newspaper one week (seven days) prior to the release of the plans.

The draft AFH and con plan will be available in the following locations:

- City of Rock Island, Community Economic Development, 1528 Third Avenue, Rock Island, IL 61201
- Martin Luther King Community Center. 630 Martin Luther King Drive, Rock Island, IL 61201
- Rock Island Public Library. 401 19th St, Rock Island, IL 61201

Please note that Non-English speaking residents and sight-impaired individuals may call (309) 732-2900 to make accommodations.

The plans will also be posted on the city's website, www.rigov.org, and can be downloaded.

Submission of Comments

Residents and stakeholders will have thirty (30) calendar days to review and submit comments regarding the content of the AFH and Con Plan. Residents and stakeholders shall submit comments in writing to "Citizen Comments on the AFH and/or five year con plan" Community and Economic Development, City of Rock Island, 1528 Third Avenue, Rock Island, IL 61201 by the review deadline. All comments will be assessed and taken into account and a public meeting will be held to discuss the plans and the comments received.

Amendments to the Draft AFH & Con Plan

The city will make available to residents and stakeholders the amended AFH and con plan on the City of Rock Island website at www.rigov.org and a hard copy will be made available for review at the locations listed above. Residents and stakeholder will have fifteen (15) calendar days to provide further review and comment. Residents and stakeholders shall submit comments in writing to "Citizen Comments on the AFH and/or five year Con Plan" Community and Economic Development, City of Rock Island, 1528 Third Avenue, Rock Island, IL 61201.

The city will conduct a second public hearing to consider the views and comments of Rock Island residents and stakeholders, and allow staff to respond to proposals and questions. The hearing shall address housing and community development needs, development of proposed activities, proposed strategies and actions for affirmatively furthering fair housing consistent with the AFH and con plan. The public hearing will end with a request by staff that the Rock Island City Council adopt the Assessment to Fair Housing Plan and the Five Year Consolidated Plan prior to submission to HUD CPD Region 5 for review and comment.

ANNUAL ACTION PLAN

The Annual Action Plan (AAP) is the annual update to the five-year Consolidated Plan and specifies what activities will be undertaken during the program year, and how the annual funding award will be allocated to address the needs and strategies identified in the five year con plan.

As part of the citizen participation process for the development of the AAP, the city will coordinate with the Community Caring Conference to schedule and conduct public meetings in designated locations in neighborhoods that have low to moderate income populations of 51% or higher. The information gathered from these meetings will assist in the development of the AAP.

When the draft AAP has been completed, the city will present the document to residents and identified stakeholders for review and comment. Notification of plan availability will be made through a public notice published in the most widely read local newspaper one week (seven days) prior to the release of the plans.

The draft AAP will be available in the following locations:

- City of Rock Island, Community Economic Development, 1528 Third Avenue, Rock Island, IL 61201
- Martin Luther King Community Center. 630 Martin Luther King Drive, Rock Island, IL 61201
- Rock Island Public Library. 401 19th St, Rock Island, IL 61201

Please note that Non-English speaking residents and sight-impaired individuals may call (309) 732-2900 to make accommodations.

The plans will also be posted on the city's website, www.rigov.org, and can be downloaded.

Submission of Comments

Residents and stakeholders will have thirty (30) calendar days to review and submit comments regarding the content of the AAP. Residents and stakeholders shall submit comments in writing to "Citizen Comments on the AAP" to the Community and Economic Development, City of Rock Island, 1528 Third Avenue, Rock Island, IL 61201 by the review deadline. All comments will be assessed and taken into account and included in the draft AAP. The first of two public hearings will be held to discuss the AAP and the comments received.

The city will conduct a final public hearing two weeks after the first public hearing to present the final AAP proposed for submission to HUD. At this public hearing, comments will once again be heard regarding the proposed activities and funding allocations. All comments written and provided orally at the public hearing will be included in the final AAP submitted to HUD. Staff will ask Rock Island City Council to approve the AAP for submission to HUD.

THE CONSOLIDATED ANNUAL PERFORMANCE AND EVALUATION REPORT (CAPER)

The city will prepare an end of year performance report (CAPER). This report will itemize and describe the outcomes all of the projects and activities that have occurred during the previous program year. The report will also provide a financial breakdown of HUD funds spent to benefit low and moderate income residents.

When the draft CAPER has been completed the city will present the document to residents and identified stakeholders for review and comment. Notification of plan availability will be made through a public notice published in the most widely read local newspaper one week (seven days) prior to the release of the CAPER.

The draft CAPER will be available in the following locations:

- City of Rock Island, Community Economic Development, 1528 Third Avenue, Rock Island, IL 61201
- Martin Luther King Community Center, 630 Martin Luther King Drive, Rock Island, IL 61201
- Rock Island Public Library, 401 19th St, Rock Island, IL 61201

Please note that Non-English speaking residents and sight-impaired individuals may call (309) 732-2900 to make accommodations.

The CAPER will also be posted on the city's website, www.rigov.org, and can be downloaded.

Submission of Comments

Residents and stakeholders will have fifteen (15) calendar days to review and submit comments regarding the content of the CAPER. Residents and stakeholders shall submit comments in writing to “Citizen Comments on the CAPER” to the Community and Economic Development, City of Rock Island, 1528 Third Avenue, Rock Island, IL 61201 by the review deadline. All comments will be assessed and a public hearing will be held to discuss the CAPER and the comments received. All comments written and provided orally at the public hearing will be included in the final CAPER submitted to HUD for review and approval.

SUBSTANTIAL AMENDMENT CRITERIA

In the event that the city wishes to include additional projects or activities that were not included in any current plan, the city will complete a substantial amendment to the plan(s) to include the new or modified circumstance. A Substantial Amendment will be required based on the following: any modification of the intent or extent of undertaking, site, or service area where a clear majority (51% or more) of the newly proposed undertaking differs from the previously described activity. Budget increases or decreases, by themselves, do not constitute substantial changes except to the extent they trigger the aforementioned criteria.

The city will amend its approved plan under the following circumstances:

- Any change in funding/allocation priorities or change in the method of fund distribution
- Additional projects or activities not previously described in the consolidated plan, assessment of Fair Housing, or the annual action plan, or
- Any change in the purpose, scope, location, or beneficiaries of an activity

In the event that the city should need to make a substantial amendment to the approved CPP, con plan or AAP the city will publish a public notice regarding the proposed change(s) in the most widely read local newspaper one week (seven days) prior to the release of the amended plan(s). Residents and stakeholders will have thirty (30) days from the date of publication to review and submit comments regarding the content of the Substantial Amendment.

Residents and stakeholders shall submit comments in writing to “Citizen Comments on the Amendment” to the Community and Economic Development, City of Rock Island, 1528 Third Avenue, Rock Island, IL 61201 by the review deadline. All comments will be assessed and a public hearing will be held to discuss the proposed amendments and the comments received. All comments written and provided orally at the public hearing will be included in the final Substantial Amendment approved by council and submitted to HUD for review and approval.

NON-SUBSTANTIAL CHANGE

A non-substantial change is defined as any change or alteration that will not constitute a substantial change as defined above under SUBSTANTIAL CHANGE. Examples of non-substantial change may include cancellation of a previously approved activity due to unforeseen circumstances that have caused significant delays or unreasonable cost burdens, removal and reallocation of funds remaining after an activity is completed as approved, and the increase of an activity budget to make up the shortage to secure a contract. City staff responsible for overseeing and managing the CDBG program will have authority to approve and implement non-substantial changes on an as-needed basis as part of the CDBG program administration.

WAIERS AS PROVIDED by HUD

In the event of natural disasters and other life threatening events such as global pandemics, the city with approval from HUD will make amendments to Annual Action Plans and other documents as approved by HUD for the CDBG program. The city will waive the 30 day public comment period and will instead allow comments for a period of five days for any amendments to the plans as allowed.

SECTION 108 LOAN GUARANTEE PROGRAM

The Section 108 Guaranteed Loan Program is designed to provide the City of Rock Island the ability to undertake economic opportunities that have a direct effect on the health and vitality of the city through the use of the city's grant award. Any funding awarded through this program must continue to meet the HUD-CDBG National Objectives and be an eligible CDBG activity.

As part of the citizen participation process the city will host a public meeting in the neighborhood where the project is to occur to discuss the project and how the funding will be used. The information gathered from these meetings will assist in the city's decision making process.

Notification of the intent to disburse funds through a Section 108 Guaranteed Loan, the public meeting and the public hearing information will be made through a public notice published in the most widely read local newspaper one week (seven days) prior to the release of the plans.

Please note that Non-English speaking residents and sight-impaired individuals may call (309) 732-2900 to make accommodations.

Submission of Comments

Residents and stakeholders will have thirty (30) calendar days to review and submit comments regarding the content of the AAP. Residents and stakeholders shall submit comments in writing to "Citizen Comments on the AAP" to the Community and Economic Development, City of Rock Island, 1528 Third Avenue, Rock Island, IL 61201 by the review deadline. All comments will be assessed and taken into account and included in the draft AAP. The first of two public hearings will be held to discuss the AAP and the comments received.

The city will conduct a final public hearing two weeks after the first public hearing to present the final AAP proposed for submission to HUD. At this public hearing, comments will once again be heard regarding the proposed activities and funding allocations. All comments written and provided orally at the public hearing will be included in the final AAP submitted to HUD. Staff will ask the Rock Island City Council to approve the AAP for submission to HUD.

SPECIAL ACCOMMODATIONS

All public meetings and hearings covered under this Citizen Participation Plan will be held at times and places convenient to potential and actual beneficiaries, and with accommodations for persons with disabilities. All notices will request that persons with disabilities or other special needs notify the city 48 hours in advance of the meeting so that appropriate accommodations can be made. The city will provide a translator and/or a sign language interpreter upon request.

NOTICE OF PLAN MEETINGS AND HEARINGS

The city will publish public notices seven days prior to the date of scheduled public meetings and public hearings. The city will also post information in city hall regarding meeting date, time, and place. Information will also be published on the city's website.

Notification of plan availability will be made through a public notice published in the most widely read local newspaper one week (seven days) prior to the release of the plans. The notice will also include a summary describing the contents and purpose of the proposed draft plan or report. All draft plans and reports will be made available in the following locations:

- City of Rock Island, Community Economic Development, 1528 Third Avenue, Rock Island, IL 61201
- Martin Luther King Community Center, 630 Martin Luther King Drive, Rock Island, IL 61201
- Rock Island Public Library, 401 19th St, Rock Island, IL 61201

All plans and reports will also be posted on the city's website, www.rigov.org, and can be downloaded.

To further encourage the participation of all citizens, including minorities and non-English speaking persons, persons with disabilities, and residents of public and assisted housing developments, the notices will also be distributed to public agencies and nonprofit groups.

PLAN PUBLICATION

All citizen and stakeholder comments and views received in writing or orally at the public hearings will be considered in the preparation of all final plans and reports, this also includes any substantial amendments made to any plan or report. Any comments or views not accepted will be included with a narrative stating the reason(s) why the comments were not considered and be included as part of the final document that will be submitted to HUD.

The city will honor all reasonable requests for free copies of all plans/reports under review.

TECHNICAL ASSISTANCE

Any group or representative of organizations that assist low and moderate income populations that desire assistance in developing proposals for funding assistance may contact the City of Rock Island Community Economic Development, 1528 Third Avenue, Rock Island, IL 61201.

COMPLAINTS

The city will provide a written response to every written citizen complaint related to all publicly released plans, Substantial Amendments to the plans, and Consolidated Annual Report within fifteen (15) days from receipt of comment. Citizens may write to "Plan and/or Report Complaints," City of Rock Island Community Economic Development, 1528 Third Avenue, Rock Island, IL 61201.

ANTI-DISPLACEMENT AND RELOCATION PLAN

The city of Rock Island seeks to minimize, to the greatest extent feasible, the displacement, whether permanently or temporarily, of persons from their homes and/or business as a result of HUD funded activities involving single or multi-family rehabilitation, acquisition, commercial rehabilitation, demolition, economic development, or capital improvement. However, if displacement occurs, the city will provide for temporary or permanent relocation of persons resulting from public and private

acquisition intended for public use and voluntary rehabilitation of private property with funds from CDBG or any other HUD funded assistance program.

The city will follow the Residential Anti-Displacement and Relocation Assistance guidelines in accordance with the Housing and Community Development Act of 1974, as amended, and HUD regulations at 24 CFR 42.325 as applicable to CDBG assisted projects.

Minimizing Displacement

Consistent with the goals and objectives of activities assisted under the Act, the city will take the following steps to minimize the direct and indirect displacement of persons from their homes:

- When considering the allocation of CDBG funds, the city will discourage projects that are likely to result in a large numbers of displacements, unless the rehabilitation of a rental development is in support of a city priority
- Coordinate code enforcement efforts with rehabilitation and housing assistance programs
- Encourage staged rehabilitation of apartment units to allow tenants to remain in the building/complex during and after the rehabilitation, working with the empty units first, if appropriate and economically feasible
- Meet all HUD notification requirements so that affected persons do not move because they have not been informed about project plans and their rights

Relocation Assistance to Residential Tenants Displaced

The city will offer relocation assistance, in accordance with the requirements of 24 CFR 42.350 (a.k.a. "Section 104[d]"), for lower-income tenants who, in connection with an activity assisted under the CDBG program, move permanently or move personal property from real property as a direct result of the demolition of any dwelling unit or the conversion of a lower-income dwelling unit. The city will ensure that these tenants have the opportunity to choose whether to receive assistance under Section 104(d) or assistance under the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (URA), as amended.

A displaced person, who is not a low or moderate income tenant, will be provided relocation assistance in accordance with the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended and implementing regulations at HUD 49 CFR Part 24.

One-for-One Replacement of Dwelling Units

The city will replace all occupied and habitable vacant low- and moderate-income housing units, demolished or converted to a use other than low- and moderate-income housing, in connection with a project assisted with CDBG funds in accordance with HUD 24 CFR 42.375. Before entering into a contract committing the city to use CDBG funds on a project that will directly result in demolition or conversion of low and moderate income housing units, the city will make public and submit to HUD a One-for-One Replacement Plan that contains the following information:

- A description of the proposed assisted activity
- The general location on a map and approximate number of dwelling units by size (number of bedrooms) that will be demolished or converted to a use other than as low and moderate income units
- A time schedule for the commencement and completion of the demolition or conversion

- The general location on a map and approximate number of dwelling units by size (number of bedrooms) that will be provided as replacement units
- The source of funding and a schedule for the provision of replacement dwelling units
- The basis for concluding that each replacement dwelling unit will remain a low and moderate income unit for at least 10 years from the date of initial occupancy
- Information demonstrating that any proposed replacement of lower-income dwelling units with smaller dwelling units (e.g., a 2-bedroom unit with two 1-bedroom units), or any proposed replacement of efficiency or single-room occupancy (SRO) units with units of a different size, is appropriate and consistent with the housing needs and priorities identified in the HUD-approved con plan and 24 CFR 42.375(b).

To the extent that the specific location of the replacement housing and other data are not available at the time of the submission, the city will identify the general location of such housing on a map and complete the disclosure and submission requirements as soon as the specific data are available.

Replacement not Required Based on Unit Availability

Under HUD 24 CFR 42.375(d), the city may submit a request to HUD for a determination that the one-for-one replacement requirement does not apply based on objective data that there is an adequate supply of low and moderate income housing units in standard condition available on a non-discriminatory basis within the area.

Relocation Contacts

The city is responsible for tracking the replacement of lower-income dwelling units and ensuring that they are provided within the required period. The city is also responsible for overseeing the provision of relocation payments and other relocation assistance to any lower-income person displaced by the demolition of any dwelling unit or the conversion of lower-income dwelling units to another use financed with CDBG funds in regards to the development of housing.