



CITY OF URBANA

CITIZEN PARTICIPATION PLAN



Citizen Participation Plan

Citizen participation is a key component of the decision-making process in all Consortium & City programs. Citizen participation is particularly important to the Community Development Block Grant (CDBG) and HOME Investment Partnership (HOME) Programs as these programs provide funds for neighborhood development and redevelopment. Without citizen input the Consortium would have no means of gauging public opinion on past performance of these programs nor would the Consortium be able to schedule future activities conducive to the needs of its residents.

This Citizen Participation Plan identifies the minimum levels of citizen participation activities, which will be undertaken by the Community Development Commission and the Grants Management Division as they implement the City's CDBG, HOME, and related community development programs. The Community Development Commission and Grants Management Division are encouraged to exceed these minimum levels whenever staffing and funding allow.

The City of Urbana, through its Community Development Commission and Grants Management Division, has provided and will continue to provide citizens with opportunities to participate in planning, implementing, and evaluating the Consolidated Plan and Annual Action Plans. Through the Grants Management Division, the City provides information to citizens, holds public hearings to obtain input of residents, and provides citizens with opportunities to comment on the activities of the Consolidated Plan/Annual Action Plans.

Virtual hearings may be held during declared disaster or pandemics, and if consistent with HUD guidance. If virtual hearings are used, real-time response and accommodation for person with disabilities and/or with limited English proficiency will be made available to the greatest extent possible. The virtual hearing method will only be used in lieu of in-person hearings if national or local health authorities recommend social distancing and limited public gatherings for public health reason.

For purposes of this Citizen Participation Plan, the CDBG, HOME, and related community development programs are collectively referred to as the "Community Development Program." The Consortium and the City of Urbana, as lead entity, provide for citizen participation throughout all stages of the Community Development Program. This includes citizen involvement in the development of the Citizen Participation Plan, and any amendments to this Plan, as well as involvement in the areas discussed below.

Consolidated Plan/Annual Action Plan Development

Citizens are involved in the development of the Consolidated Plan, including Annual Action Plans and any substantial amendments.

Consolidated Plan Implementation

Citizens have an opportunity to be involved in policy decisions regarding program implementation via the Community Development Commission.

Assessment of Consolidated Plan Performance

Citizens and citizen organizations are given the opportunity to assess and submit comments on all aspects of the Consolidated Plan, Annual Action Plans, and Performance Reports, including the

performance of any program subgrantees. Citizens are also given the opportunity to assess projects and activities to determine whether Consolidated Plan strategies and specific objectives are being achieved. Citizens have opportunities to assess performance through public hearings and meetings, contact with the Community Development Commission, and contact with the Grants Management Division staff.

The Urbana Community Development Commission (CDC)

The CDC is comprised of nine Urbana residents appointed by the Mayor with consent of City Council. Appointees serve three-year renewable terms. The following excerpt from the By-Laws of the CDC explains the purpose of this body:

“The purpose of the Community Development Commission is to develop and recommend to the Urbana City Council a community development plan; advise the City Council on community development goals, objectives, and resource allocations; monitor and evaluate community development activities; receive citizen input; and represent the population in community development activities.”

Considering the above purpose, the CDC members make recommendations to the Urbana City Council on issues related to the Community Development Program, including but not limited to the following:

- Identification of housing and non-housing community development needs of low-income persons and persons with special needs such as homeless persons and non-homeless persons requiring supportive housing;
- Identification of strategies and specific objectives to address housing and community development needs;
- Establishment of programs and activities to further housing and community development strategies and specific objectives;
- Recommendation of CDBG and HOME program activities and budgets;
- Scheduling of Consolidated Plan/Annual Action Plan preparation and public hearings;
- Evaluation of program effectiveness.

The Grants Management Division provides staff support for the Community Development Commission. The Grants Management Division Manager or their appointee then communicates CDC recommendations to the Mayor and City Council.

Note: Additional approval by certain advising boards and commissions, as well as the Champaign City Council and/or the Champaign County Board may be in order. The process in these cases is essentially the same.

The CDC meets on the fourth Tuesday of each month at 6 p.m. at the Urbana City Building Complex. During preparation of the Consolidated Plan/Annual Action Plans, the CDC holds special meetings as necessary, in addition to the regular monthly meeting. All meetings of the Commission are open to the public.

Public Hearings and Plan Submission

This Citizen Participation Plan provides for public input meetings and hearings to obtain citizen views at different stages of the Community Development Program. Hearings and/or meetings are

held at times and locations which permit broad participation by all residents, particularly low-income persons. Public hearing arrangements facilitate the full participation of persons with disabilities, non-English speaking citizens, and elderly residents. All meetings/hearings are held in facilities accessible to persons with disabilities.

Because many CDBG and HOME activities are targeted toward residents of low-income neighborhoods, some meetings/hearings may be located at sites within these neighborhoods for the convenience of their residents. Because success of the Community Development Program depends in large part on cooperation of other housing and social service agencies, some hearings may be held at times and places convenient to representatives of those agencies.

Consolidated Plan/Annual Action Plan Notices and Public Comment Period

The City/Consortium provides citizens at least 30 days to comment on the Consolidated Plan and Annual Action Plans. The public comment period must be noticed in a newspaper of general circulation in Champaign County. The notice must include the estimated amount of funding to be received from HUD during the Consolidated Plan period or program year, funding contingency plan, as well as programs and activities to be funded, including amount, and the proposed benefit to low- and moderate-income persons. The notice should also include a list of locations where copies of the draft document may be examined and instructions on how to submit comments for review.

Consolidated Plan / Annual Action Plan Hearings

The City/Consortium holds at least three (3) public input meetings and two (2) public hearings during the Consolidated Plan and yearly Annual Action Plan process. One hearing will be held in the beginning of the planning process to receive input on housing and community development needs and strategies and to obtain comments on program progress and performance, and to obtain proposals for use of CDBG and HOME funds for the next fiscal year. At least one (1) public input meeting is held at a time and place convenient to social service agency representatives.

The second public hearing will be held at least 30 days before submittal of the Consolidated Plan/Annual action Plan to receive comments on the proposed final draft of the plan. All comments received regarding the draft plan, whether written or verbal, is considered by the City/Consortium in preparing a final document for submittal to HUD. A summary of comments and City/Consortium responses is included with the final submittal.

The City/Consortium shall give adequate notice of all public hearings concerning the Annual Action Plan and Consolidated Plan through notification on social media, a written notice posted by the City Clerk's Office at least 7 days prior to the hearing, and through publication in a local newspaper of general circulation at least fourteen (14) days prior to the hearing. Public hearing notices may be combined with notices announcing public comment periods for the Consolidated Plan/Annual Action Plan.

Substantial Program Amendments

The City/Consortium provides citizens at least 30 days to comment on any proposed substantial amendment prior to taking final action on the proposed amendment. An amendment to the Plan is considered substantial if it meets any one of the following four (4) criteria:

- The amendment proposes to use either CDBG or HOME funds for one or more activities which were not approved as part of the Consolidated Plan/Annual Action Plan submittal;
- The amendment proposes to alter the purpose, location, or class of beneficiaries of activities included in the Consolidated Plan/Annual Action Plan;
- The amendment proposes any change in the allocation or distribution of funds, activity, or recipient and the dollar amount of that change is equal to or greater than 25% of the current fiscal year federal allocation;
- The amendment proposes a strategy not included in the approved Consolidated Plan.

The City/Consortium notifies HUD in writing of any substantial amendment adopted by City Council. Any proposed amendments to the Consolidated Plan/Annual Action Plan not meeting the foregoing definition of "substantial amendment" may be authorized by City Council without special public notice or public hearing. The City/Consortium gives adequate notice of all public hearings through notification on social media, a written notice posted by the City Clerk's Office at least 7 days prior to the hearing, and through publication in a local newspaper of general circulation at least fourteen (14) days prior to the hearing. If consistent with HUD guidance, the public comment period may be reduced to not less than five (5) days during a declared disaster or pandemic with notice being published five days prior to the meeting.

- The City/Consortium displays a notice of each hearing on the City of Urbana website and the City of Urbana Events Calendar, and UPTV at least fourteen (7) days prior to each hearing.

Notices indicated above indicate the date, time, place, and purpose of each hearing. Public notices of preliminary Consolidated Plan/Annual Action Plan hearings may include the following information:

- The amount of CDBG and HOME funds available to the City and HOME Consortium members for community development and affordable housing activities, including the annual grant, program income, and miscellaneous funds;
- The range of activities that may be undertaken with CDBG and HOME funds and examples of activities previously funded through these programs;
- The process for drafting and approving the Consolidated Plan/Annual Action Plan, including a schedule of meetings and hearings;
- The role of citizens in development of the Consolidated Plan/Annual Action Plan;
- A summary of important program requirements;
- Information indicating how citizens can obtain summaries, approved by Resolution of the City Council, of the City/Consortium's most recent Consolidated Plan draft, budget, and multi-year fiscal plan.

The City/Consortium sends a notice of availability of copies of the draft Consolidated Plan/Annual Action Plan electronically to appropriate neighborhood organizations and social service agencies, including the Housing Authority of Champaign County.

Non-Substantial Amendments

Any proposed amendment(s) to the approved Consolidated Plan that does not meet the above definition of a substantial amendment will be approved by the Grants Management Division

Manager. No public notifications, public hearings, and public body approvals are required. A record of the transaction will be included in the budget file. Any change that comes about as a result of a disaster declared by either the Mayor or the Governor shall be included and notice of the change will be given to the public. However, in this case, the 30-day comment period is not applicable.

Access to Information

The City/Consortium provides the public full access to program information and makes an affirmative effort to provide adequate information to citizens, particularly low-income residents residing in neighborhoods targeted by the Community Development Program. The Consolidated Plan/Annual Action Plan as drafted and adopted, substantial amendments as proposed and adopted, and performance reports as proposed and approved are available to the general public. Upon request, these materials are made available in a form accessible to persons with disabilities and non-English speaking persons in electronic format.

The City/Consortium provides full and timely disclosure of its program records and information consistent with Federal, State, and Local laws regarding personal privacy and confidentiality. Citizens may review documents relevant to the Community Development Program upon request at the Grants Management Division office during normal working hours (Monday through Friday, 8:00 a.m. to 5:00 p.m.).

Performance Reporting

The City/Consortium provides citizens with opportunities to comment on draft performance reports prior to their submittal to HUD. The City/Consortium will hold a minimum 15-day public comment period for the annual performance report prior to HUD submittal, during which a draft of the report will be available for review by the public.

The public comment period will be announced in a local newspaper of general circulation, as well as on social media and/or the City's website. Notices should include a list of locations where copies of the draft document may be examined and instructions on how to submit comments for review.

Prior to submittal to HUD, the City/Consortium will hold a public hearing regarding the draft performance report, and shall give adequate notice of the public hearing through notification on social media, a written notice posted by the City Clerk's Office at least 7 days prior to the hearing, and through publication in a local newspaper of general circulation at least fourteen (14) days prior to the hearing. The public hearing notice may be combined with the notice announcing the comment period.

The City/Consortium shall consider any comments or views of citizens received in writing, or orally at public hearings in preparing the performance report. A summary of these comments or views shall be attached to the performance report.

Copies of proposed and approved Consolidated Plans/Annual Action Plans, Performance Reports, and substantial amendments to the plan are available for public review on the City of Urbana website at www.urbanainllinois.us and at the following location:

- City of Urbana, 400 South Vine Street, Urbana
 - Grants Management Division, Community Development Services Dept.

- City Clerk's Office
- Urbana Free Library, 210 West Green Street, Urbana

The City of Champaign is responsible to make the Plans and Reports available at the following locations:

- Champaign Public Library, 200 West Green Street, Champaign
- City of Champaign, 102 N. Neil Street, Champaign, Neighborhood Services Department Information Desk

Copies of the draft report may be emailed to appropriate neighborhood organizations and social service agencies upon request.

Information regarding the Community Development Program, including notices of public hearings/meetings and availability of draft documents, are provided to Housing Authority of Champaign County to afford the Housing Authority and its tenants an opportunity to provide input into the program.

Submission of Comments and Proposals

The City/Consortium encourages submission of comments and proposals concerning the Community Development Program by all citizens, particularly low-income persons and residents of low-income neighborhoods. This includes submission of comments to City staff, the Community Development Commission, and to City Council.

In notices of public hearings regarding preliminary and draft Consolidated Plans/Annual Action Plans, the City/Consortium makes clear the availability of CDBG and HOME funds to eligible subrecipients. Notices describe the process by which organizations may apply for CDBG and HOME funds from the City/Consortium. For full consideration, all proposals must be addressed to the City in care of the Grants Management Division.

The City/Consortium provides timely responses to all comments and proposals submitted to the Grants Management Division, including written responses to written comments and proposals stating the reasons for actions taken by the City/Consortium on the comments and proposals. All responses are made within fifteen (15) working days of submission of comments and proposals. During a declared pandemic or disaster, the responses will be made within five (5) working days.

Anti-Displacement Concerning CDBG and HOME Funded Programs

When implementing programs and activities included in its Consolidated Plan/Annual Action Plan, the City minimizes displacement of persons and businesses. Whenever possible, projects are sited and/or timed to minimize the number of persons who must be relocated to accommodate the projects. Whenever possible, specific vacant properties targeted by the City/Consortium for acquisition and clearance are acquired to prevent displacement.

In the event that an activity undertaken by the City/Consortium with Federal funds (i.e. CDBG, HOME, or other Federal Funds) results in displacement of a homeowner, tenant, or business, the City/Consortium will provide technical and financial assistance to the person or business owner. This is in accordance with the Federal Uniform Relocation Act and with Section 104(d) of the Housing and Community Development Act of 1974, as amended. Grants Management Division

staff provide each person and/or business owner to be relocated with information regarding the relocation process and relocation assistance for which the person or business owner may be eligible. Staff provides this information in a manner easily understood by the client.

Technical Assistance

The City/Consortium provides technical assistance at the level and of the type deemed appropriate by the Grants Management Division Manager. Technical assistance is provided to the CDC and to any neighborhood or area-wide organization so such organization may adequately participate in planning, implementing, and assessing the Community Development Program. Technical assistance is also provided to groups of low-income persons and to groups of residents of neighborhoods targeted by the CDBG & HOME Programs to help such groups complete written comments and funding proposals in connection with the Community Development Program. All requests for technical assistance should be made to the Grants Management Division Manager, 400 South Vine Street, Urbana, Illinois 61801 or grants@urbanaininois.us

Complaints

Complaints regarding the Community Development Program should be addressed to the Grants Management Division Manager, 400 South Vine Street, Urbana, Illinois 61801 or grants@urbanaininois.us. The Grants Management Division Manager responds to any written complaint within fifteen (15) working days of its receipt.

Summary of Comments from Public Hearings

A summary of the comments at any of the public input meetings or hearings will be included along with a copy of the sign-in sheets from the public hearing events.

Summary of Efforts to Broaden Public Participation

The City of Urbana publishes information concerning the Consolidated Plan and Annual Action on the City website, www.urbanaininois.us. The City of Champaign publishes information concerning the Consolidated Plan and Annual Action on the City website, www.champaignil.gov.

Efforts will be made to distribute copies of all documents related to the Consolidated Plan and Annual Action Plan to better reach minority and disabled persons in an effort to gain feedback on the planning documents.

Explanation of Comments Not Accepted

All comments will be accepted and will be included in the Consolidated Plan.