

City of Evanston Citizen Participation Plan Amendment for the 2022 Action Plan

DRAFT FOR PUBLIC COMMENT

Changes highlighted in yellow

Introduction and Purpose

As a recipient of Community Development Block Grant (CDBG), HOME Investment Partnerships (HOME) and Emergency Solutions Grant (ESG) entitlement funds from the U.S. Department of Housing and Urban Development (HUD), the City of Evanston is required to develop a Consolidated Plan and annual Action Plans to guide its use of those funds, and Consolidated Annual Performance and Evaluation Reports (CAPER) to report accomplishments against the goals of those plans. The City is also responsible for engaging the public in all phases of the development of its Consolidated Planning process. In addition to consulting with public and private agencies to define community needs and resources available to address them, the City encourages participation from all residents, particularly low- and moderate-income residents, non-English speaking residents, persons with disabilities, and other segments that receive services funded by its entitlement grants, to expand their participation in the Consolidated Planning process.

The City of Evanston's Citizen Participation Plan (CPP) outlines the policies and procedures the City has developed to encourage Evanston residents and stakeholders to participate in the development of the City's Consolidated Plans, annual Action Plans and CAPERs, as well as any substantial amendments to the Consolidated Plan or Action Plans. The CPP is designed in accordance with Section 104 (a) of the Housing and Community Development Act of 1974, codified at 42 U.S.C. Section 5304 (a) and 24 CFR Part 91.105.

The City's Community Development Department is the lead agency with responsibility for the Consolidated Planning process, including implementation of its Citizen Participation Plan.

Development of the Consolidated Plan and Action Plans

Community Development staff use online surveys and public meetings to get input on the housing, community and economic development needs and priorities from its residents for the development of the Consolidated Plan. Surveys, focus groups and individual conferences are used to get input from housing providers, non-profit services providers, public agencies and elected and appointed officials. Input regarding needs in the community is sought from residents and stakeholders at two or more meetings to inform the development of each Action Plan.

A draft of each Consolidated Plan and/or Action Plan is posted on the City's website and printed copies are made available at the Lorraine Morton Civic Center, Evanston Main Library and the Robert Crown Branch Library Center, unless those buildings are closed due to the COVID-19 or any other emergency, during the required 30-day comment period. Public input on the plan is sought by the Housing and Community Development Committee in written form and at a public meeting during the 30-day comment period. The committee recommends approval of the plans to the City Council subsequent to that process. City Council meetings at which action to adopt or approve the plans is taken also offer opportunity for public comment. Any public comment received during the comment period or at the public meetings is summarized and attached to the Consolidated Plan and/or Action Plan prior to its submission to HUD, including any comments or views that are not accepted and the reasons for which they are not accepted. Consolidated Plans and Action Plans must be approved by City Council prior to the end of the preceding calendar year to ensure expenses incurred by CDBG funded programs can be charged beginning on January 1, the start of the City's fiscal year. Action Plans are submitted to HUD once the City is in receipt of final grant amounts.

Needs Assessment - CARES Act Substantial Amendment to the 2019 Action Plan

Housing and Grants staff received input on the needs resulting from the COVID-19 pandemic from Evanston stakeholders and residents during the development of the CARES Act substantial amendment. Sources include:

- Mayor Hagerty's COVID-19 Task Force comprising key members of the education, government, business, faith, nonprofit, health, and senior communities. Organizations include AMITA Health Saint Francis Hospital, NorthShore University HealthSystem, Representative Jan Schakowsky, State Senator Laura Fine, State Representatives Robyn Gabel and Jennifer Gong-Gershowitz, Cook County Commissioner Larry Suffredin, Evanston senior living communities, Evanston Chamber of Commerce, Evanston Community Foundation, Interfaith clergy and leaders, Evanston Own It, Northwestern University, Evanston/Skokie School District 65, and Evanston Township High School District 202. The task force has been met at least weekly since 3/17/2020.
- City of Evanston Emergency Operations Center, a cross-departmental team formed to address the immediate needs of the COVID-19 emergency, secure resources to address those needs, and develop a multi-phase "re-opening" plan for the City, coordinated with the State of Illinois and federal plans.
- Non-profit agencies that are addressing the needs for housing, shelter, food, and other necessities, including Connections for the Homeless, Meals On Wheels Northeast Illinois, Interfaith Action, YWCA Evanston North Shore, Family Promise, and the McGaw YMCA Men's Residence Program.
- Surveys of local businesses and landlords/property managers to determine needs and their ability to access assistance through programs such as the Small Business Administration's Payroll Protection Plan.

Process for Citizen Participation

The City of Evanston invites public participation at all stages of the Consolidated Planning process. The City is committed to making reasonable and timely access to the needs assessment, strategy development and budget recommendation process for all members of the community, particularly low- and moderate-income persons.

Substantial Amendments to the Consolidated Plan or Action Plans

HUD requires entitlement communities to specify the criteria that trigger an amendment to the Consolidated Plan or Action Plan and describe the public process for amending those plans. The City of Evanston defines a substantial amendment to the Consolidated Plan or Action Plan as:

- A change in funding among the Goals used in the development of the plan (SP-45 for Consolidated Plan, AP-20 for Annual Action Plans), that is greater than 20% of the total allocated towards the Goal
- The deletion of a Goal included in a plan
- The addition of a Goal not currently included in a plan

Any changes to an Action Plan following receipt of the City's entitlement grant amounts that increase or decrease funding for a goal by less than 20% shall be considered "non-substantial" and may be approved by the Housing and Community Development Committee or Social Services Committee as appropriate, based on the program affected. These changes would not trigger a second public comment period.

Substantial amendments to the Consolidated Plan are proposed to the Housing and Community Development Committee for review and a public hearing is conducted. Additionally, the public is provided a minimum of 30 days to review and make comments on the proposed change. If approved by that committee, the substantial amendment is submitted to the City Council for approval.

Substantial amendments to Action Plans are proposed to the Housing and Community Development Committee and, if pertaining to CDBG Public Services or ESG funding, jointly to the Social Services Committee. The required 30-day comment period to hear public comment on the proposed change would be held by the Housing and Community Development Committee; a joint meeting with the Social Services Committee could be held if the amendment related to funding overseen by that committee. If approved at the committee level, the substantial amendment is submitted to the City Council for approval. All City Council meeting agendas include public comment, so the Council meeting may also serve as the public meeting for the 30-day public comment period. Any substantial amendment approved by the City Council is submitted to HUD as it occurs during the year or at the end of the program year. All public comments received during the comment period or at the public meetings are considered, summarized and attached to the substantial amendment when submitted to HUD; any comments or views that are not accepted and the reasons for which they are not accepted are also included.

CARES Act Substantial Amendment Process

The CARES Act substantial amendment requires amendments to both the 2019 Action Plan and 2015-2019 Consolidated Plan. These amendments, and this amendment to the Citizen Participation Process, will be posted on the City of Evanston's HUD Consolidated Plan webpage for a minimum of five (5) days, as required. Comments on the substantial amendments may be submitted via email to housing@cityofevanston.org during the five-day public comment period. In addition, the CARES Act substantial amendment must be approved by City Council before it is submitted to HUD. The substantial amendment is included in the packet for the City Council "virtual" meeting and posted at least 48 hours prior to that meeting. Input may be provided in writing via email, or verbally by telephone or online during public comment. Any public comment received, including at public comment at the City Council meeting, are considered, summarized and attached to the substantial amendment when submitted to HUD; any comments or views that are not accepted and the reasons for which they are not accepted are included.

All other amendments shall be considered "non-substantial." This includes amendments to either the Consolidated Plan or Action Plan that are required when plans are based on estimated funding and are modified based on actual grant amounts.

Consolidated Annual Performance and Evaluation Report

The Consolidated Annual Performance and Evaluation Report (CAPER) identifies the expenditures and performance results for each Annual Action Plan activity in a completed program year and any outstanding activities from prior program years. Corresponding to the City's fiscal year of January 1-December 31, CAPERs are submitted to HUD by March 31, within 90 days of the City's program year end. Prior to its submission to HUD, the draft CAPER is posted on the City's website for the required 15-day public comment period and The Housing and Community Development Committee holds a public meeting to hear public input. Input is also accepted in written form. The Housing and Community Development Committee recommends acceptance of the CAPER to the City Council. The City Council meeting at which the CAPER is approved also provides opportunity for public comment. Any public comment received during the comment period or at the public hearing is considered, summarized and attached to the CAPER for submission to HUD.

Public Meetings

In addition to public meetings of the Housing and Community Development Committee and Social Services Committee, there are opportunities for citizen input on housing, economic development and public services needs throughout the year at regularly scheduled public meetings of the Economic Development Committee, Planning and Development Committee and Human Services Committee, as well as at City Council meetings.

To ensure access for persons with disabilities, most meetings are held at the Lorraine H. Morton Civic Center and occasionally at other locations that are accessible to persons with mobility impairments including the Main Public Library, Robert Crown Community Center, Levy Center and Fleetwood-Jourdain Community Center. Translators are provided at meetings if requested 48 hours in advance of the meeting.

Meetings of the City Council and Standing Committees of the Council are broadcast on the Evanston cable channel 16 and streamed live on the internet. Notices of public meetings and comment periods include contact information for anyone needing assistance because of a disability or language difference. If an individual is unable to attend a public hearing and wishes to comment on the subject matter of the hearing, written comments may be submitted to the Housing and Grants division of the Community Development Department via email, USPS or in person.

Amendment for Public Meetings During Declarations of Emergencies

During the COVID-19 pandemic, Evanston public meetings have been modified based on Governor Pritzker's order that waives some requirements of the Illinois Open Meetings Act to allow local governments to hold "remote" meetings to help control the spread of COVID-19. That order waives the requirement that a quorum of members of a public body be "physically present" at the meeting location, and limits the circumstances under which an individual member may take part by video or audio conference. It applies to City Council meetings, as well as Evanston board, committee and commission meetings. The order did not suspend other provisions of the Open Meetings Act pertaining to public notice of all meetings or that meetings be open and accessible to the public and press, and include a means for the public to address the Council, board, committee or commission.

Funding Allocation Process

The City of Evanston's fiscal year starts on January 1, but CDBG, HOME and ESG grant amounts historically are released well after that date. In order to bill eligible expenses to its CDBG grant beginning on January 1, the City must hold a 30-day public comment period on a draft Action Plan prior to January 1. To comply with this requirement, funding allocations are made to the Consolidated Plan goals based on estimated CDBG, HOME, and ESG grant amounts, and any CDBG and HOME program income received to date. The draft Action Plan is posted by mid-November for the required 30-day comment period, and is reviewed and discussed at a meeting of the Housing and Community Development Committee that oversees the City's Consolidated Planning process. The Housing and Community Development Committee holds a meeting at which members of the public are invited to provide comments on the draft Action Plan, generally at the close of the public comment period in mid-December. The Committee then votes to approve the draft Action Plan, and recommend its approval to City Council following the receipt of its grant amounts and review and approval of any amendments needed based on actual funding. Funding for City Public Facilities/Infrastructure and Housing projects and programs may be made at this time and approved by the Housing and Community Development Committee as part of the draft Action Plan approval, subject to change based on the receipt of actual grant amounts.

The draft Action Plan is updated to reflect actual CDBG, HOME and ESG grant amounts following their release by HUD. CDBG, HOME and ESG entitlement grant funding, as well as prior year program income, is allocated to Goals in the final Action Plan and submitted to City Council for approval before being submitted to HUD. If the changes result in a substantial

amendment to the draft Action Plan, a second 30-day comment period and public meeting are held before it is submitted to City Council for approval.

A substantial amendment to the Action Plan is defined in the CPP as:

- A change in funding among the Goals used in the development of the plan (AP-20) that is greater than 20% of the total allocated towards the Goal
- The deletion of a Goal included in the plan
- The addition of a Goal not currently included in the plan

Any changes to the Action Plan following receipt of the City's entitlement grant amounts that increase or decrease funding for a goal by less than 20% shall be considered "non-substantial" and may be approved by the Housing and Community Development Committee or Social Services Committee as appropriate, based on the program affected. These changes would not trigger a second public comment period.

CDBG funding allocations to external partners are made using a RFP and review process by the Housing and Community Development Committee or Social Services Committee; these are generally held after the City receives its entitlement grant amount. Applications may also be considered on a rolling basis to address emerging or changing needs arising from an emergency such as the COVID-19 pandemic, or to more effectively coordinate with or leverage other sources of funding. HOME funding is allocated to specific projects or activities on a rolling basis for the same reasons. All ESG funds are generally allocated to specific agencies for eligible activities shortly after the release of funding in order to meet the deadlines for committing and expending funds. Recommendations from the Housing and Community Development Committee go directly to the City Council. Recommendations from the Social Services Committee generally go to the Human Services Committee, a standing committee of the City Council, and then to City Council; they may also go first to the Planning and Development or Administration and Public Works Committees before going to City Council in the event that a Human Services Committee meeting is canceled, or to expedite approvals.

CARES Act Funding Allocation Process

To expedite access to funding and provide relief to residents, City staff developed the substantial amendment for CARES Act funding based on the needs identified through the assessment process described above. This enables the City to submit its substantial amendment before the detailed regulations for CDBG-CV and ESG-CV are released. It also allows greater flexibility to prevent, prepare for, and respond to the coronavirus by addressing needs that will likely arise in the months ahead. Funding allocations to specific activities will be made on a rolling basis to target needs that are not being addressed through other CARES Act funding and potential duplication of benefits. This process is similar to how HOME and ESG funds are allocated to one or more goals in the annual Action Plan rather than the annual application process used for CDBG entitlement which uses an open application process and allocations are made to specific activities to develop the Action Plan. Funding allocations for specific activities will be reviewed and approved by the City Council prior to implementation. City Council may

delegate authority to approve funding allocations for specific activities to the Housing and Community Development Committee, Social Services Committee, Economic Development Committee, or other boards, committees or commissions that have been formed by the City to oversee the type of activities being funded on behalf of City Council. Any such action will be approved by City Council at a public meeting that provides members of the public the opportunity to provide input on the action. Information on the proposed action will be included in the agenda and packet for the meeting that is posted at least 48 hours in advance, in compliance with the Open Meetings Act.

Public Outreach

The City uses multiple communications channels to inform residents about the Consolidated Planning process and engage them in its development, approval and assessment. The following outreach efforts may be taken as appropriate to provide citizen access to the Consolidated Planning process. Failure to use any one of these shall not be considered a violation of this Plan.

- Notices of all public comment periods and public hearings are published in a paper of general circulation, on the homepage of the City website, on the City's social media accounts (Facebook, Twitter, etc.), and via the City's e-newsletter that goes to over 45,000 emails prior to the opening of the public comment period. The notice includes the dates of the comment period; the date, time and location of the public hearing.
- Notices of public meetings are sent to the media for all public meetings in accordance with the Illinois Open Meetings Act and posted on bulletin boards in the Lorraine H. Morton Civic Center. Meeting agendas, packets and minutes are posted online for public review at www.cityofevanston.org.
- Email notification is sent to community organizations and individuals who request to receive information about meeting dates, agendas, funding application and allocation schedules, and other information.

Access to Information

The City of Evanston Consolidated Plan, including this CPP, Annual Action Plans, any Substantial Amendments to those plans, and Consolidated Annual Performance and Evaluation Reports are available online at www.cityofevanston.org. The City website may be translated into 150 different languages using Google Translate. In addition, the Consolidated Plan, Action Plans and CAPERs are available in print format for public review during regular working hours at:

Community Development Department
Lorraine H. Morton Civic Center
2100 Ridge Ave, 3rd Floor
Evanston, IL 60201
847-448-4311

This information shall be provided in a format accessible to persons with disabilities, upon adequate notice. Requests for additional information may be made to the Community Development Department at the address and phone listed above. A response shall be provided

within 15 working days of receipt of the request, where practicable. If printed copies are requested, photocopier charges and miscellaneous charges for other related services and materials will be assessed in accordance with the City's Freedom Of Information Act policy.

Comments/Complaints

Any complaints relating to the Consolidated Plan, Action Plan or CAPER received in writing will receive a written response within 15 working days. The following points are used as guidance in responding to complaints:

- Stated needs and objectives are inconsistent with available and reliable data
- Stated projects are inappropriate for meeting needs and approved objectives
- Consolidated Plan does not comply with regulations for the Community Development Block Grant, HOME Investment Partnerships or Emergency Shelter grants programs.

Displacement

The City of Evanston will make every effort to minimize the displacement of persons as a direct result of the implementation of projects funded by its HUD entitlement grant programs. If displacement does occur, the City will follow all applicable federal regulations to alleviate the impact of such permanent and involuntary relocations.

Section 108 Loan Guarantee

The City of Evanston intends to apply for a Section 108 Loan Guarantee, authorized under HUD regulation 24 CFR Part 570, Subpart M, in the form of a Pooled Fund. If received, the Section 108 Program will be subject to all provisions set forth within this Citizen Participation Plan. Applications for Section 108 loan guarantee assistance may be included as part of the process for obtaining CDBG or HOME Entitlement funds, or may be undertaken separately anytime during the program year. The required public hearing to inform citizens of uses of funds will be carried out by the City's Economic Development Division or Community Development Department staff.