

**City of Rochester, Minnesota**  
**Community Development Block Grant Program**

***Citizen Participation Plan***  
**(Updated 2020)**

Federal regulations require that recipients of the Community Development Block Grant (CDBG) program follows an approved Citizen Participation Plan in order to receive continued federal funding. To meet the federal requirements for receipt of CDBG funds, the City of Rochester certifies that it will adhere to the following approved Citizen Participation Plan in providing for and encouraging public participation in the development and administration of its CDBG program. The City of Rochester does not currently receive Home Investment Partnership (HOME), American Dream Down payment Initiative (ADDI), Emergency Shelter Grants (ESG) and Housing Opportunities for Persons with AIDS (HOPWA) funds; however, if, in the future, the City of Rochester does receive HOME, ADDI, ESG or HOPWA funds, the Citizen Participation Plan will be amended to include those programs.

**I. Intent of the Community Development Block Grant program.**

The City of Rochester's intent for its CDBG program is to meet the identified needs of low and moderate income residents and to provide a more desirable living environment for all residents within the City. Due to limited resources, it is impossible for the City to identify all of the needs of our residents and/or fund all of the programs / activities necessary to meet those needs. Therefore, the City must rely on a coordinated effort among private citizens, social service providers and other governmental agencies to assist in addressing the needs of the residents of Rochester. To encourage citizen participation, in the identification of community needs and appropriate measures to address them, the City has adopted the following Citizen Participation Plan.

**II. Scope of Public Participation in the CDBG Program**

A. The City of Rochester will provide for continuity of citizen participation throughout all stages of the application and administrative tasks of the CDBG program. Citizen involvement will be encouraged through the reasonable and timely access to local meetings, information and records relating to the following areas:

- The Consolidated Plan and needs analysis;
- The annual One Year Annual Action Plan;
- The Consolidated Annual Performance Evaluation Report (CAPER);
- The Analysis of Impediments to Fair Housing (AL);
- Subsequent amendments and other changes to the above initiated by the US Department of Housing and Urban Development or other federal agencies.

- B. Upon request, staff will assist in providing technical assistance to any individual and/or organization in developing proposals and submitting comments for any of the program areas listed in Section II-A, above.
- C. Citizens and their representatives will be given the opportunity to assess all aspects of the performance of the CDBG program throughout the year and submit comments to staff.

All records, except for those which are considered to be private or confidential under applicable laws, pertaining to past use of CDBG funds may be reviewed during normal business hours at the Rochester Community Development Department, to assist in the public's assessment of the City's CDBG program.

At various times throughout the year, the City will specifically request comments on various aspects of the CDBG programs. The requests will be advertised in one or more of the following methods:

- Paid legal notice or display ad in the Rochester Post Bulletin
- Articles in the Rochester Post Bulletin

The city will also maintain an attitude of openness and helpfulness in order to encourage public response through an atmosphere of cooperation.

- D. The City will record the following items of comment in its annual performance report(s):
  - Copies of all comments submitted, throughout the year, by citizens in regard to the City's performance.
  - The City's assessment of the citizen's comments; and
  - A summary of any action taken in response to the comments received.
- E. All complaints and / or grievances filed by a citizen, or a representative of a citizen, shall be submitted in writing to the staff. Upon receipt of the complaint and / or grievance, staff will review it, prepare a written response and forward the response no later than fifteen (15) working days following the date the complaint and/or grievance was received.

### **III. Application for Funding**

- A. The public service application process for each new CDBG program year will begin in late fall of the preceding program year. Staff will prepare a "Notice of Funding Availability" and "Requests and Public Hearing" statement. The statement will include the following information:

- The total amount of CDBG funds available or anticipated to be available to the City of Rochester for new program year;
  - The range of activities that may be financed with CDBG funds;
  - The objectives set forth by the federal government which must be met to qualify for funding.
  - The procedure to follow for submitting proposals to the City and a brief summary of the entire application process, including a schedule of applicable notices, public hearings and meetings;
  - Any additional information which the staff determines to be significant to any particular program year (i.e. new regulations).
- B. The “Requests and Public Hearing” statement will be published in easily readable type in the local newspaper of general circulation, at least twenty (20) days prior to the deadline set for accepting proposals.
- C. The “Notice of Funding Availability” statement will be sent to local non-profit public and private organizations and/or agencies to solicit their assistance and input on the needs of the community and proposed uses for the anticipated CDBG funds. The organizations/agencies will be given no less than twenty (20) days to submit their proposals and/or comments to the City for review.

#### **IV. Review of Proposals for Funding**

- A. The proposals submitted by City Departments, community members and / or non-profit organizations will be reviewed by staff and project eligibility will be evaluated. Upon making a determination of program / project eligibility, staff will prepare a written report regarding the eligibility and summary of each proposal for to the City Council within fifteen (15) days after the deadline date for submitting proposals or the pre-scheduled public hearing date for the City Council.
- B. The qualifying project proposals will be forwarded in a report from staff to the Steering Committee for review. Staff will make a recommendation to the steering committee for both internal allocations and applications for public service activities. Applications will be scored based on criteria outlined in the CDBG Application Notice Attachment. The Steering Committee will select the projects to be recommended for funding. The City Council will make final determination of the level of funding for each project at a public hearing meeting.

## V. Public Hearing

- A. The City of Rochester will hold a public hearing for the purpose of soliciting community input for preparation of the City's Annual Action Plan or Consolidated Plan for the CDBG program. The public hearing will be held in the evening beginning at 7:00 pm and will be noticed in easily readable type in the local newspaper at least two weeks prior to the scheduled meeting. The following provides a summary of action to occur at the public hearing.

The public hearing will be held in October. The City Council will review the recommendation made by the Steering Committee, listen to verbal testimony and evaluate the comments provided by staff on the general program requirements and project(s) eligibility. The City Council will make selection of the projects for inclusion in the City's application for federal funds. The projects selected by the City Council, in addition to comments from citizens regarding the needs of the community, will be included in the City's "Annual Action Plan" for the new program year.

- B. All public hearings for the CDBG program noted in II.A. shall be held in the Council / Board Chambers in the Government Center at 151 4th Street SE, Rochester, MN. The Council / Board Chambers are located in the downtown area of Rochester and provides a centralized location which is easily accessed through public or private transportation. The Council / Board Chambers are also accessible to the disabled community. Notices for all public hearings will be published at a minimum ten (10) days prior to the public hearing in the local newspaper prior to the scheduled meeting. In the event of funding allocations to address urgent needs, a reduced notice period of nine (9) days of the publication will be implemented to expedite funding.
- C. If a significant number of non-English speaking residents are expected to participate at a public hearing, the City will make every effort to accommodate them through the use of presently-employed, bilingual City staff or by hiring a translator for the meeting.

## VI. Award of Funding

- A. After the City Council has selected the projects for inclusion in its application to the U.S. Department of Housing and Urban Development through the public hearing process, a notice of the draft "Annual Action Plan" for the new program year will be prepared and published for public comment. The "Notice for Public Comments" will be published in the local newspaper and will announce the opening of the public review period; the review period will be no less than thirty (30) days in length.
- B. Citizens of Rochester wishing to object to HUD approval of the application submitted by the City may do so by contacting:

City of Rochester  
Office of City Administration  
201 Fourth Street SE  
Rochester, MN 55904  
Phone: 507.328.2000  
Fax: 507.328.2727  
[www.rochestermn.gov](http://www.rochestermn.gov)

- C. Public comments on the draft profile shall be submitted in writing, to staff. Upon completion of the review period, staff will include all comments with the submittal of the Annual Action Plan or Consolidated Plan to the U.S. Department of Housing and Urban Development. Citizens of Rochester wishing to object to HUD approval of the application submitted by the City may do so by contacting the Minnesota Office of U.S. Department of Housing and Urban Development at 212 3<sup>rd</sup> Avenue South, Suite, Minneapolis, MN 55401, (612) 370.3019. Citizen objections should be filed with the U.S. Department of Housing and Urban Development within thirty (30) days of the publication of the City's notice that the application has been submitted to HUD for approval. In the event of funding allocations to address urgent needs, a reduced public comment period of five (5) days of the publication will be implemented to expedite funding.

The U.S. Department of Housing and Urban Development will consider objections to the application on the following grounds only: The City's description of needs and objectives is plainly inconsistent with available facts and data; or the activities to be undertaken are plainly inappropriate to meeting the needs and objectives identified by the City; or the application does not comply with the requirements' applicable law; or the application proposes activities which are otherwise ineligible according to federal regulations.

All objections should include identification of the requirements not met and, in the case of objections made claiming the description of needs and objectives is plainly inconsistent with generally available facts and data, the data upon which the persons rely.

- D. The City's final application for CDBG funds will be prepared by staff and forwarded to the Minnesota State Office of the U.S. Department of Housing and Urban Development (HUD) prior to the November 15<sup>th</sup> deadline.

## **VII. Displacement Minimization**

It is the intent of the City of Rochester to avoid, whenever possible, the involuntary displacement of any family, household, individual, business or non-profit organization due to acquisition, rehabilitation or demolition activity funded through the CDBG program.

As a general rule and under routine circumstances, the City will not undertake any CDBG project which will result in the involuntary displacement of low / moderate income households from their homes. If, however, involuntary displacement does, in fact, occur as an unanticipated result of any activity funded by CDBG (or an activity which is not funded directed by CDBG funds, but part of a larger CDBG funded project), the City will adhere to its approved “Residential Relocation Plan” (Uniform Act 104(j)) assistance to the displaced households.

The City’s Residential Relocation Plan was originally adopted in 1987. The Plan will be updated as necessary to provide adequate protection to displaced households due to CDBG related activities.

### **VIII. Program Amendments**

The City will adhere to this Citizen Participation Plan whenever the Annual Action Plan or Consolidated Plan is amended and shall forward such amendment to the U.S. Department of Housing and Urban Development for documentation. The City is required by federal regulations to amend its final Annual Action Plan whenever a decision is made to:

- add a project not previously identified; or
- to substantially change the purpose, scope, location or beneficiaries of an identified activity.

For the purpose of processing amendments to the City’s final Annual Action Plan, “substantial change” is defined as: A change in the CDBG funding level of a project or activity 25% or greater than the original adopted project budget.

Prior to amending its Annual Action Plan or any other aspect of its CDBG program, the City shall provide citizens with reasonable notice of and opportunity to comment on the proposed changes. When necessary, the City will hold a public hearing on the proposed amendment(s) according to the procedures outlined in Section V of this Plan.

*Adopted by the Rochester City Council on: May 4, 2020*