



Citizen Participation Plan 2020

Introduction

The City of West Des Moines is required by law to develop and follow detailed, written policies and procedures – a citizen participation plan – to involve the public, particularly low- and moderate-income people, in developing and implementing its Consolidated Plan and its integral components – annual action plans, annual performance reports, and amendments.

The Consolidated Plan is a five-year plan, describing the City’s development needs, resources, priorities, and proposed activities to be undertaken under certain U.S. Department of Housing and Urban Development (HUD) programs, including the Community Development Block Grant (CDBG) Program. The City of West Des Moines also prepares an Annual Action Plan describing the programs to be undertaken during one year. And lastly the City prepares the Consolidated Annual Performance Evaluation Report (CAPER) to describe the activities undertaken during a program year.

The City of West Des Moines believes involving the public is a vital part of the Consolidated Plan process. As such, they will provide the public opportunities to participate, and will consult with other public and private agencies providing assisted housing, health services, social services, child welfare agencies (regarding lead-based paint), adjacent local governments (for non-housing community development needs), and local housing authorities in planning and implementing the Consolidated Plan.

This plan provides information on:

- ⇒ Encouraging public participation
- ⇒ Publication of materials
- ⇒ Public hearings
- ⇒ Citizen comment procedures
- ⇒ Process for substantial amendments
- ⇒ Technical assistance provision
- ⇒ Anti-displacement plan
- ⇒ Complaint procedures
- ⇒ Access to information

In response to COVID-19, the City of West Des Moines has modified this Citizen Participation Plan to allow for quick response and changes to its CDBG allocation. The most significant change is going from a typical 30-day public comment period to a 5-day public comment period. This is allowable under a waiver granted by the U.S. Department of Housing and Urban Development (HUD). Also, during the public comment period, plans and amendments will be publicized on the City’s website and public comments may be made via email. The plans and amendments will not be available for in-person review at city buildings if those city buildings are closed to the public for public health reasons. If City buildings are open to the public, then copies of the plans and amendments will be available for in-person review. In addition, public

hearings at City Council for approval of such changes may be held through virtual meetings as necessary for public health reasons.

Encouraging Public Participation

The law (24 CFR 91.105) requires the citizen participation plan provide for and encourage public involvement, emphasizing participation by low- and moderate-income people – especially those living in low- and moderate-income neighborhoods. This participation is to occur as the Consolidated Plan, Annual Action Plan and CAPER are being developed, and if any substantial amendments to the documents are proposed. Additionally, the City will encourage minorities, non-English speaking people, and people with disabilities to participate by contacting groups and agencies that represent or serve these populations. Current program documents are in English only, however, if other languages are needed, please contact the Community and Economic Development Department.

The City will provide information to the local housing authorities to ensure that residents of participating in their programs are informed about the entire Consolidated Plan, Annual Action Plan, and CAPER process and their opportunities to participate.

Publication of Materials

The City of West Des Moines will provide program and policy information to stakeholders, including the general public, public and private agencies providing housing assistance, health services, social services, child welfare services, economic development services, job training and employment assistance services, the local housing authorities, and other interested parties. This information will include:

- The funding (grant funds and program income) the City expects to receive through the Community Development Block Grant Program and the estimated amount that will benefit low- and moderate-income people;
- The range of activities that may be undertaken, as well as activities previously funded;
- The City's process of developing the Consolidated Plan, Annual Action Plan, CAPER, and its components;
- The public's role in the program; and
- Other materials as needed to inform and educate the public about the programs.

The proposed and adopted Citizen Participation Plan, Consolidated Plan, Annual Action Plan, CAPER, as well as substantial amendments, will be accessible to the public on the City's website. While City buildings are closed, the plans and amendments will only be available for review on the City's website for public health safety.

A notice the proposed Consolidated Plan, Annual Action Plan, CAPER, and substantial change will be published in the Des Moines Register. The notice will describe the plan and/or amendment available for review.

Public Hearings

Notice of all public meetings will be published in the Des Moines Register and posted on the City's website, no less than 4 days prior to a public hearing.

Meeting information will be mailed (traditionally and/or electronically, or faxed) to stakeholders, including public and private agencies providing housing assistance, health services, social services, child welfare services, economic development services, job training and employment assistance services, neighborhood organizations, the local housing authorities, and other interested parties.

In addition, public hearings at City Council for approval of such plans and amendments may be held through virtual meetings as necessary for public health reasons.

Citizen Comment Procedures

Oral comments recorded at a public meeting and written, or emailed comments made during the Consolidated Plan, Annual Action Plan, and/or CAPER process will be accepted by the Community and Economic Development Department during the 5-day public comment period. The comment period associated with a specific activity will be published in the Des Moines Register and on the City's website. All comments will be considered, and all comment will receive a response. A summary of all comments and their responses will be explained to the City Council in the staff report. A summary of all comments, attached to the final Consolidated Plan, Annual Action Plan and/or CAPER, as appropriate.

Process for Substantial Amendments

Amendments that fall under the definition of "substantial change" shall be subject to a 5-day public comment period. "Substantial change" shall be defined as:

- Any new activity;
- Any deletion of a budgeted activity;
- A 25 percent increase or decrease in an activity; or
- Any change in an activity's national objective designation.

West Des Moines has shorted the public comment period for substantial amendments to adequately respond to the COVID-19 epidemic in our community with CDBG funds. The shorted public comment period allows the City to deliver the funds into the community quicker.

A notice of a substantial amendment will be published in the Des Moines Register, followed by a 5-day public comment period.

All comments will be considered, and all comment will receive a response. All substantial changes must be presented to the City of West Des Moines City Council for action. A summary of all comments and their responses will be explained to the City Council in the staff report.

No amendment may be undertaken prior to the expiration of the public comment period.

Technical Assistance Provision

The Community and Economic Development Department will assist individual's representative of low- and moderate-income people interested in applying for funding for an activity. Requests for technical assistance must be made in writing, specifying the name of the individual requesting assistance, address, phone number and/or email address of a contact person; the nature of technical assistance requested; immediate problems and the reason for the request. The Community and Economic Development Department will determine the level and type of assistance provided.

Anti-displacement Plan

The City of West Des Moines will make all reasonable efforts to ensure that activities undertaken with CDBG Program funds will not cause unnecessary displacement. The City will administer the CDBG Programs in such a manner that careful consideration is given during the planning phase to avoiding displacement. Displacement of any nature shall be reserved as a last resort action necessitated only when no other alternative is available and when the activity is determined necessary in order to carry out a specific goal or objective that is of benefit to the public.

If the displacement is precipitated by activities that require the acquisition (either in whole or in part) or rehabilitation of real property directly by the City of West Des Moines or an agent, all appropriate benefits as required by the Uniform Relocation Assistance and Real Property Acquisition Policies' Act of 1970 and amendments. The "Uniform Act" or the Residential Anti-displacement and Relocation Assistance Plan under Section 104 (d) shall be provided to the displaced person or persons. Information about these programs will be provided to all persons who may potentially be displaced in the form of informational brochures on these programs and explained in detail by the City's staff.

Complaint Procedures

Complaints regarding the Community Development Block Grant Program will be answered by the Community and Economic Development Department staff in a timely and responsive manner. The staff will make every reasonable effort to provide written responses within 15 working days.

Access to Information

Program information and records are available upon request at the Community and Economic Development Department during normal business hours. Such documents include the following:

- All mailing and promotional materials;
- Records of public meetings;
- All key documents, including prior applications, letters of approval, grant agreements, the citizen participation plan, performance reports, evaluation reports, other reports required by the U.S. Department of Housing and Urban Development, the proposed and approved application for the current year;
- Copies of the regulations and issuances governing the program; and
- Documents regarding other important program requirements, such as contracting procedures, environmental policies, fair housing and other equal opportunity requirements, and relocation provisions.

For more information or to submit comments about the programs:

Mail: Community and Economic Development Department
4200 Mills Civic Parkway, Suite 2B
P.O. Box 65320
West Des Moines, IA 50265

Email: Christine.gordon@wdm.iowa.gov

Phone: 515-273-0770

Fax: 515-222-3640