



City of Rochester, NY

# CITIZEN PARTICIPATION PLAN AMENDED 2020

Lovely A. Warren, Mayor  
City of Rochester



**Believe.**



City of Rochester, NY  
Lovely A. Warren, Mayor  
Rochester City Council

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## **AMENDED CITIZEN PARTICIPATION PLAN**

**RELATING TO THE ADMINISTRATION OF  
THE COMMUNITY PLANNING & DEVELOPMENT PROGRAMS  
OF THE U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT (HUD)**

Adopted by City Council on June 16, 2020

**CITY OF ROCHESTER, NY  
 AMENDED CITIZEN PARTICIPATION PLAN  
 RELATING TO THE ADMINISTRATION OF THE COMMUNITY PLANNING &  
 DEVELOPMENT PROGRAMS OF THE U.S. DEPARTMENT OF HOUSING AND URBAN  
 DEVELOPMENT (HUD)**

**Table of Contents**

<b>A.</b>	<b>Introduction</b>	<b>4</b>
	Purpose	
	Lead Agency	
	Effective Date	
<b>B.</b>	<b>Encouragement of Citizen Participation</b>	<b>5</b>
	General	
	Low- and Moderate-Income Persons	
	Persons with Disabilities	
	Non-English Speakers	
	Stakeholders Organizations and Agencies	
	Public Hearing Notices	
	Public Meetings and Hearings	
	Technical Assistance	
	Online Access	
	Other Engagement Techniques	
	Other Considerations and Inform Consolidated Planning	
	City Contact Person	
<b>C.</b>	<b>In Case of Disaster or State of Emergency</b>	
<b>D.</b>	<b>The Citizen Participation Plan (Participation Plan)</b>	
	Amending the Approved Citizen Participation Plan	
	Participation Plan Amendment Considerations	
	Amended Participation Plan Public Display and Comment Period	
	Comments Received on Draft Amended Plan	
	Amended Participation Plan Public Hearing	
	City Council Action on Amended Participation Plan	
	Submission of Amended Participation Plan to HUD	
	Citizen Participation Plan Access	
<b>E.</b>	<b>The Consolidated Plan (Con Plan)</b>	
	Consolidated Plan Development	
	Potential Displacement of Persons	
	Consolidated Plan Public Hearings	
	Consolidated Plan Public Display and Comment Period	
	Comments Received on the Draft Consolidated Plan	
	Consolidated Plan City Council Action	
	Consolidated Plan Submission to HUD	
	Amending the Consolidated Plan	

- Con Plan Amendment Considerations
- Con Plan Amendment Public Display and Comment Period
- Comments Received on Proposed Con Plan Amendment/s
- Con Plan Amendment/s Public Hearing
- Con Plan Amendment City Council Action
- Con Plan Amendment Submission to HUD

Consolidated Plan Access

**F. The Annual Action Plan (Action Plan)**

- Annual Action Plan Development
  - Potential Displacement of Persons
  - Action Plan Public Hearings
  - Action Plan Public Display and Comment Period
  - Comments Received on the Draft Annual Action Plan
  - Annual Action Plan City Council Action
  - Annual Action Plan Submission to HUD
- Amending the Annual Action Plan
  - Action Plan Amendment Considerations
  - Action Plan Amendment Public Display and Comment Period
  - Comments Received on Proposed Action Plan Amendment/s
  - Action Plan Amendment Public Hearing
  - Action Plan Amendment City Council Action
  - Action Plan Amendment Submission to HUD

Annual Action Plan Access

**G. Consolidated Annual Performance and Evaluation Report (CAPER)**

- CAPER Development
  - CAPER Report Considerations
  - CAPER Public Display and Comment Period
  - Comments Received on the Draft CAPER
  - CAPER Submission to HUD

**H. Section 108 Loan Guarantee Program**

- Development of Section 108 Loan Guarantee Application
- Section 108 Loan Application Public Display and Comment Period
- Comments Received on the Proposed Section 108 Loan Application
- Section 108 Loan Application Submission to HUD

**I. Complaints**

**CITY OF ROCHESTER, NY  
AMENDED CITIZEN PARTICIPATION PLAN  
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**A. Introduction**

**Purpose**

Pursuant to the public participation requirements of 24 CFR Section 91.105 and 24 CFR Part 5, the City of Rochester (referred to as the “City”) sets forth the following amended Citizen Participation Plan (the “Participation Plan”) as it relates to the administration of the Community Planning and Development (CPD) programs funded by the U.S. Department of Housing and Urban Development (HUD). This document presents the City’s plan for providing for and encouraging members of the public to participate in the Consolidated Planning Process, which includes the development, amendment, adoption, and implementation of:

- 1) The Citizen Participation Plan (Participation Plan)
- 2) The Consolidated Plan (Con Plan)
- 3) The Annual Action Plan (Action Plan)
- 4) The Consolidated Annual Performance and Evaluation Report (CAPER), and
- 5) The Section 108 Loan Guarantee Program

**Lead Agency**

The Department of Neighborhood and Business Development is the lead agency responsible for the administration of the Community Development Block Grant Program (CDBG), HOME Investment Partnerships, Emergency Solutions Grant (ESG), and Housing Opportunities for Persons with AIDS (HOPWA) Programs.

**Effective Date**

Subsequent to approval of this amended Citizen Participation Plan by City Council and HUD, it shall be effective until it is amended again or otherwise replaced.

**B. Encouragement of Public Participation**

**General**

The City provides for and encourages members of the public to participate in the Consolidated Planning Process, which includes development, amendment, adoption and implementation of the Citizen Participation Plan, the Consolidated Plan, the Annual Action Plan, the Consolidated Annual Performance and Evaluation Report (CAPER), and the Section 108 Loan Guarantee Program.

The City encourages participation by low- and moderate-income persons, particularly those living in areas where HUD funds are proposed to be used, and by residents of predominantly low- and moderate-income neighborhoods (defined as areas where at least 51% of residents have incomes less than 80% of the area median income). The City also encourages participation by persons with disabilities, non-English speakers, and stakeholder organizations and agencies. A variety of mechanisms may be utilized to engage and receive input from individuals and organizations including public meetings, public hearings, mail surveys, internet-based feedback and surveys, telephone or in-person interviews, focus groups, consultation workshops, written letters or emails.

### **Low- and Moderate-Income Persons**

To encourage low- and moderate-income persons to participate in the Consolidated Planning process, the City will conduct at least one public meeting in a publically accessible location on a high-frequency transit corridor near the Downtown Transit Center.

### **Persons with Disabilities**

To encourage persons with disabilities to participate in the Consolidated Planning process, the City will conduct all public meetings in locations that are accessible and will include the following language in public meeting notices:

*The City of Rochester will make reasonable accommodations and services necessary for sensory-impaired and disabled citizens at the public meeting. Additionally, translation services may be offered upon request and availability. Persons requiring such accommodations/services should contact the City at least five working days in advance of the meeting.*

### **Non-English Speakers**

The City has determined that, based on 2011-2015 American Community Survey data, approximately 5 percent of city residents are native Spanish-speakers who speak English less than very well. To encourage these residents to participate in the Consolidated Planning process, the City will:

- Make information handouts and surveys available in Spanish, if requested.
- Offer Spanish translation services at public meetings, if requested

### **Stakeholder Organizations and Agencies**

The City encourages local and regional organizations and agencies – particularly those that assist low- and moderate-income persons or serve low-mod areas (defined as areas where at least 51% or more of the residents have incomes less than 80% of the area median income) – including, but not limited to, City staff, State and federal agencies, neighboring local governments, regional agencies like the Rochester Housing Authority (RHA) and the Continuum of Care (CoC), non-profit housing and legal services agencies, affordable housing developers, social service providers (including those focusing on services to children, the elderly, persons with disabilities, persons with HIV/AIDS, and persons with substance use), homeless services and prevention providers, community-based and neighborhood organizations, businesses, philanthropic organizations, faith-based organizations, and others to participate in the Consolidated Planning process.

### **Public Hearing Notices**

Public hearings held as part of the Consolidated Planning process, shall be advertised in the Democrat and Chronicle no less than seven days before the public hearing is held.

### **Public Meetings and Hearings**

Public hearings related to the Consolidated Planning process will be scheduled at times and locations that are convenient for potential and actual program beneficiaries to the greatest extent possible, and with accommodation for persons with disabilities and non-English Spanish speakers in accordance with this Participation Plan.

### **Technical Assistance**

City staff are available to assist organizations and other eligible applicants that are interested in submitting a proposal to obtain funding when CDBG/HOME/ESG/HOPWA funds are RFPed. All potential applicants are strongly encouraged to contact appropriate City of Rochester staff for technical assistance before initiating a funding request application.

### **Online Access**

The City will post draft and final copies of all documents covered by the Consolidated Plan on its website accessible at [www.cityofrochester.gov/ConsolidatedPlan2020to2024](http://www.cityofrochester.gov/ConsolidatedPlan2020to2024)

### **Other Engagement Techniques**

The Consolidated Planning process may be amended as the City continues to gain access to technology that improves the avenues of participation for members of the public and other stakeholders.

### **Other Considerations That Inform Consolidated Planning**

The City's Housing Policy, adopted in 2008, guides the use of CDBG and HOME resources available to address priority housing needs and goals.

The development of the City's Comprehensive Plan, *Rochester 2034*, adopted in November of 2019, included extensive community and stakeholder input and provides context and direction to inform the Consolidated Planning process.

The goals and priorities of the Mayor and Administration also guide development of the Consolidated Plan and its associated documents.

### **City Contact Person**

All communication regarding comments, complaints, reasonable accommodation for disabled persons, translation services, or other elements related to the Participation Plan, Con Plan, Action Plan, CAPER, or Section 108 Loan Guarantee Program shall be directed to: Amy Ventura, CDBG Coordinator, [Amy.Ventura@CityofRochester.Gov](mailto:Amy.Ventura@CityofRochester.Gov).

## **C. In Case of Disaster or State of Emergency**

### **In the Event of Disaster or State of Emergency**

In the event of a local, state, or federally declared disaster, state of emergency, or public health crisis where public buildings or facilities may be closed to the public and in-person participation may not be feasible or public gatherings may be considered a public health risk, the City may opt to conduct public display and comment periods as well as public hearings and meetings for any of the documents covered by the Consolidated Plan online via the City's website and/or other webpages or virtual meeting spaces.

In this instance, the number of public hearings and length of public hearing notice, and length of public display and comment periods will be consistent with HUD requirements. All online public hearings will, at a minimum, include a space where public comments can be shared. Accommodations will be made for persons with disabilities and non-English speaking persons upon request.

## **D. The Citizen Participation Plan (Participation Plan)**

### **Amending the Approved Citizen Participation Plan**

The City shall use the following procedure to amend its approved Citizen Participation Plan, as needed.

#### **a. Participation Plan Amendment Considerations**

The City will amend the Participation Plan, as necessary, to ensure adequate engagement and involvement of the public in making decisions related to its Consolidated Planning process and HUD funding programs. Substantial amendments to the Participation Plan may be required should a provision of the Plan be found by the City to conflict with HUD regulations, or when changes in HUD regulations occur, or based on current HUD guidance. Edits to the Participation Plan that only include updated contact information or editorial changes for clarity will not be released for public review and comment.

#### **b. Amended Participation Plan Public Display and Comment Period**

The draft Amended Plan will be made available for public display and comment for at least 15-days prior to formal action by City Council, which may be concurrent with the public review and comment process for any of the documents included in the Consolidated Planning process.

Copies of the draft Amended Participation Plan will be made available for review at the following locations:

- City Hall: 30 Church St (Rm 224B), Rochester, NY 14614
- Northeast Neighborhood Service Center: 500 Norton St Rochester, NY 14621
- Northwest Neighborhood Service Center: 71 Parkway – 1<sup>st</sup> Floor Rochester, NY 14608
- Southwest Neighborhood Service Center: 923 Genesee St Rochester, NY 14611
- Southeast Neighborhood Service Center: 320 N Goodman St Rochester, NY 14607

- City of Rochester website: [www.cityofrochester.gov/ConsolidatedPlan2020to2024](http://www.cityofrochester.gov/ConsolidatedPlan2020to2024)

c. Comments Received on Amended Participation Plan

Written comments on the Amended Participation Plan will be accepted by the City Contact Person, or a designee, during the 15-day public display and comment period. The City will consider comments received during the public display and comment period in preparing the final Amended Citizen Participation Plan. A summary of these comments, and a summary of comments not accepted and the reasons why, will be attached to the final Participation Plan for formal action by City Council and submission to HUD.

d. Amended Participation Plan Public Hearing

The City will conduct a public hearing on the Amended Citizen Participation Plan prior to formal action by City Council and submittal to HUD. This public hearing may be held concurrently with the public hearing held for with other documents included in the Consolidated Planning process.

e. City Council Action on Amended Participation Plan

Following the public hearing, City Council will take formal action on the Amended Citizen Participation Plan.

f. Submission of Amended Participation Plan to HUD

The Amended Citizen Participation Plan will be submitted to HUD, along with proof of compliance with the minimum 15-day public review and comment period.

**Amended Citizen Participation Plan Access**

The Amended Citizen Participation Plan will be kept on file at the Department of Neighborhood and Business Development, City Hall Rm 224B.

It can also be accessed online at: [www.cityofrochester.gov/ConsolidatedPlan2020to2024](http://www.cityofrochester.gov/ConsolidatedPlan2020to2024)

**E. The Consolidated Plan (Con Plan)**

**Consolidated Plan Development**

The City will follow the process and procedures described below in the development of its Consolidated Plan.

b. Potential Displacement of Persons

The City does not anticipate any residential displacement to occur from the use of its HUD funds. If, as a result of a program activity, any residential displacement and relocation must occur, the City of Rochester ensures that it will develop an Anti-Displacement and Relocation Plan in connection with that project in accordance with federal regulations. Specifically, the City will comply with the Uniform Relocation Act and *HUD Handbook No. 1378, Tenant Assistance, Relocation and Real Property Acquisition*.

c. Consolidated Plan Public Hearings

The City will conduct at least two public hearings in the development of the Con Plan. The first public hearing will be conducted before the draft is published for public comment, during which the City will address the historic amounts of assistance that the City has received, the range of housing and community development activities that may be undertaken, the process for developing the Con Plan, and a review of past program performance.

The second public hearing will be conducted during or after the 30-day public display and comment period, during which time the public can comment on the proposed Consolidated Plan prior to formal action by City Council.

d. Consolidated Plan Public Display and Comment Period

The draft Consolidated Plan will be placed on display for a period of no less than 30 days to encourage public review and comment. The public notice shall include a brief summary and purpose of the Plan, the anticipated amounts of funding (including program income, if any), the dates of the public display and comment period, the locations where copies of the draft Plan can be examined, how comments will be accepted, when the document will be considered for formal action by City Council, and the anticipated submission date to HUD.

Copies of the draft Consolidated Plan will be made available for review at the following locations:

- City Hall: 30 Church St (Rm 224B), Rochester, NY 14614
- Northeast Neighborhood Service Center: 500 Norton St Rochester, NY 14621
- Northwest Neighborhood Service Center: 71 Parkway – 1<sup>st</sup> Floor Rochester, NY 14608
- Southwest Neighborhood Service Center: 923 Genesee St Rochester, NY 14611
- Southeast Neighborhood Service Center: 320 N Goodman St Rochester, NY 14607
- City of Rochester website: [www.cityofrochester.gov/ConsolidatedPlan2020to2024](http://www.cityofrochester.gov/ConsolidatedPlan2020to2024)

e. Comments Received on the Draft Consolidated Plan

Written comments on the Draft Consolidated Plan will be accepted by the City Contact Person, or a designee, during the 30-day public display and comment period. The City will consider comments received during the public display and comment period in preparing the final Consolidated Plan. A summary of these comments, and a summary of comments not accepted and the reasons why, will be attached to the final Consolidated Plan for formal action by City Council and submission to HUD.

f. Consolidated Plan City Council Action

Following the second public hearing, City Council will take formal action on the Consolidated Plan.

b. Consolidated Plan Submission to HUD

The final Consolidated Plan will be submitted to HUD no less than 45 days before the start of the City's five-year program cycle, unless otherwise directed by HUD.

## **Amending the Consolidated Plan**

The City shall follow the following procedure to make amendments to its Consolidated Plan, as needed.

### **a. Con Plan Amendment Considerations**

There are two types of amendments that may occur with the Con Plan: minor amendments and substantial amendments. An amendment to the approved Con Plan is considered substantial under the following circumstances:

- When there is a change to the identified priority needs or goals, or new priority needs or goals are added

All other changes that do not meet the criteria defined above will be considered minor amendments by determination of the City of Rochester Law Department and will not be subject to public comments. These changes will be fully documented by the CDBG Coordinator in the Department of Neighborhood and Business Development.

### **b. Con Plan Amendment Public Display and Comment Period**

Proposed substantial Con Plan amendment/s will be placed on display for a period of no less than 30 days to encourage public review and comment. The public notice shall include a brief summary of the amendment/s, the dates of the public display and comment period, the locations where copies of the proposed Con Plan Amendments can be examined, how comments will be accepted, when the document will be considered for formal action by City Council, and the anticipated submission date to HUD.

Copies of the draft substantial Con Plan amendments will be made available for review at the following locations:

- City Hall: 30 Church St (Rm 224B), Rochester, NY 14614
- Northeast Neighborhood Service Center: 500 Norton St Rochester, NY 14621
- Northwest Neighborhood Service Center: 71 Parkway – 1<sup>st</sup> Floor Rochester, NY 14608
- Southwest Neighborhood Service Center: 923 Genesee St Rochester, NY 14611
- Southeast Neighborhood Service Center: 320 N Goodman St Rochester, NY 14607
- City of Rochester website: [www.cityofrochester.gov/ConsolidatedPlan2020to2024](http://www.cityofrochester.gov/ConsolidatedPlan2020to2024)

### **c. Comments Received on Proposed Con Plan Amendment/s**

Written comments on proposed substantial Con Plan Amendments will be accepted by the City Contact Person, or a designee, during the 30-day public display and comment period. The City will consider comments received during the public display and comment period in preparing final Substantial Con Plan Amendment/s. A summary of these comments, and a summary of any comments not accepted and the reasons why, will be attached to the final Substantial Con Plan Amendment/s for formal action by City Council and submission to HUD.

### **d. Con Plan Amendment/s Public Hearing**

The City will conduct a public hearing on any proposed substantial Con Plan Amendment/s prior to formal action by City Council and submittal to HUD.

e. Con Plan Amendment City Council Action

Following the public hearing, City Council will take formal action on proposed substantial Con Plan Amendment/s.

f. Con Plan Amendment Submission to HUD

Documentation of all substantial Con Plan Amendments will be submitted to HUD.

**Consolidated Plan Access**

The final Consolidated Plan and Con Plan Amendments will be kept on file at the Department of Neighborhood and Business Development, City Hall Rm 224B.

It can also be accessed online at [www.cityofrochester.gov/ConsolidatedPlan2020to2024](http://www.cityofrochester.gov/ConsolidatedPlan2020to2024)

**F. The Annual Action Plan (Action Plan)**

The Annual Action Plan is a component of the Consolidated Plan, and it describes the City's proposed use of available federal and other resources to address the priority needs and specific objectives in the Con Plan for each program year.

**Annual Action Plan Development**

The City will follow the process and procedures described below in the development of its Annual Action Plan.

a. Potential Displacement of Persons

The City does not anticipate any residential displacement to occur from the use of its HUD funds. If, as a result of a program activity, any residential displacement and relocation must occur, the City of Rochester ensures that it will develop an Anti-Displacement and Relocation Plan in connection with that project in accordance with federal regulations. Specifically, the City will comply with the Uniform Relocation Act and *HUD Handbook No. 1378, Tenant Assistance, Relocation and Real Property Acquisition*.

b. Action Plan Public Hearings

The City will conduct at least two public hearings during the development of the Action Plan. The first public hearing will be conducted before the Action Plan draft is published for public comment, during which the City will address identified housing and community development priority needs and goals, the amount of assistance the City expects to receive, the range of activities that may be undertaken and development of proposed projects, and review of past program performance.

The second public hearing will be conducted during or after the 30-day public comment period, during which time the public can comment on the proposed action plan prior to formal action by City Council.

Both public hearings conducted for the Year 1 Action Plan may be conducted concurrently with the required public hearings for the Consolidated Plan.

c. Action Plan Public Display and Comment Period

The draft Action Plan will be placed on display for a period of no less than 30 days to encourage public review and comment. The public notice shall include a brief summary of the Action Plan, the anticipated amounts of funding (including program income, if any), the dates of the public display and comment period, the locations where copies of the draft Action Plan can be examined, how comments will be accepted, when the document will be considered for formal action by City Council, and the anticipated submission date to HUD.

Copies of the draft Action Plan will be made available for review at the following locations:

- City Hall: 30 Church St (Rm 224B), Rochester, NY 14614
- Northeast Neighborhood Service Center: 500 Norton St Rochester, NY 14621
- Northwest Neighborhood Service Center: 71 Parkway – 1<sup>st</sup> Floor Rochester, NY 14608
- Southwest Neighborhood Service Center: 923 Genesee St Rochester, NY 14611
- Southeast Neighborhood Service Center: 320 N Goodman St Rochester, NY 14607
- City of Rochester website: [www.cityofrochester.gov/ConsolidatedPlan2020to2024](http://www.cityofrochester.gov/ConsolidatedPlan2020to2024)

d. Comments Received on the Draft Annual Action Plan

Written comments on the Draft Annual Action Plan will be accepted by the City Contact Person, or a designee, during the 30-day public display and comment period. The City will consider comments received during the public display and comment period in preparing final Annual Action Plan. A summary of these comments, and a summary of any comments not accepted and the reasons why, will be attached to the final Annual Action Plan for formal action by City Council and submission to HUD.

e. Annual Action Plan City Council Action

Following the second public hearing, City Council will take formal action on the Annual Action Plan.

f. Annual Action Plan Submission to HUD

The Annual Action Plan will be submitted to HUD no less than 45 days before the start of the City's annual program year, unless otherwise directed by HUD.

### **Amending the Annual Action Plan**

The City shall follow the following procedure to amend its Action Plan, as needed.

a. Action Plan Amendment Considerations

There are two types of amendment that may occur with the Action Plan: minor amendments and substantial amendments. An amendment to the approved Action Plan is considered substantial under the following circumstances:

- When the description or activities of a project are significantly changed, or when a project is added or deleted.
- When a 25 percent change in federal funding occurs for any project.

All other changes that do not meet the criteria defined above will be considered minor amendments by determination of the City of Rochester Law Department and will not be subject to public comments. These changes will be fully documented by the CDBG Coordinator in the Department of Neighborhood and Business Development.

b. Action Plan Amendment Public Display and Comment Period

Proposed substantial Action Plan Amendment/s will be placed on display for a period of no less than 30 days to encourage public review and comment. The public notice shall include a brief summary of the revisions, the dates of the public display and comment period, the locations where copies of the draft substantial Action Plan Amendment/s can be examined, how comments will be accepted, when the document will be considered for formal action by City Council, and the anticipated submission date to HUD.

Copies of proposed substantial Action Plan Amendment/s will be made available for review at the following locations:

- City Hall: 30 Church St (Rm 224B), Rochester, NY 14614
- Northeast Neighborhood Service Center: 500 Norton St Rochester, NY 14621
- Northwest Neighborhood Service Center: 71 Parkway – 1<sup>st</sup> Floor Rochester, NY 14608
- Southwest Neighborhood Service Center: 923 Genesee St Rochester, NY 14611
- Southeast Neighborhood Service Center: 320 N Goodman St Rochester, NY 14607
- City of Rochester website: [www.cityofrochester.gov/ConsolidatedPlan2020to2024](http://www.cityofrochester.gov/ConsolidatedPlan2020to2024)

c. Comments Received on the Proposed Annual Action Plan Amendment/s

Written comments about proposed substantial action plan amendments will be accepted by the City Contact Person, or a designee, during the 30-day public display and comment period. The City will consider comments received during the public display and comment period in preparing final substantial Action Plan Amendment/s. A summary of these comments, and a summary of any comments not accepted and the reasons why, will be attached to the final substantial Action Plan Amendment/s for formal action by City Council and submission to HUD.

d. Action Plan Amendment Public Hearing

The City will conduct a public hearing on proposed substantial Action Plan Amendment/s prior to formal action by City Council and submittal to HUD.

e. Action Plan Amendment City Council Action

Following a public hearing, City Council will take formal action on final substantial Action Plan Amendment/s.

f. Action Plan Amendment Submission to HUD

Documentation of all substantial Action Plan Amendments will be submitted to HUD.

**Annual Action Plan Access**

Final Annual Action Plans and any Action Plan Amendments will be kept on file at the Department of Neighborhood and Business Development, City Hall Rm 224

It can also be accessed online at [www.cityofrochester.gov/ConsolidatedPlan2020to2024](http://www.cityofrochester.gov/ConsolidatedPlan2020to2024)

## **G. Consolidated Annual Performance and Evaluation Report (CAPER)**

### **CAPER Development**

The City shall use the following procedure in the drafting and adoption of its Consolidated Annual Performance and Evaluation Report (CAPER).

a. CAPER Report Considerations

The Department of Neighborhood and Business Development will evaluate and report the accomplishments and expenditures of the previous program year for CDBG, HOME, ESG and HOPWA funds and draft the CAPER in accordance with HUD requirements.

b. CAPER Public Display and Comment Period

The draft CAPER will be placed on display for a period of no less than 15 days to encourage public review and comment. The public notice shall include a brief summary and purpose of the CAPER, a summary of program expenditures, a summary of program performance, the dates of the public display and comment period, the locations where copies of the draft CAPER can be examined, how comments will be accepted, and the anticipated submission date to HUD.

Copies of the draft CAPER will be made available for review at the following locations:

- City Hall: 30 Church St (Rm 224B), Rochester, NY 14614
- Northeast Neighborhood Service Center: 500 Norton St Rochester, NY 14621
- Northwest Neighborhood Service Center: 71 Parkway – 1<sup>st</sup> Floor Rochester, NY 14608
- Southwest Neighborhood Service Center: 923 Genesee St Rochester, NY 14611
- Southeast Neighborhood Service Center: 320 N Goodman St Rochester, NY 14607
- City of Rochester website: [www.cityofrochester.gov/ConsolidatedPlan2020to2024](http://www.cityofrochester.gov/ConsolidatedPlan2020to2024)

c. Comments Received on the Draft CAPER

Written comments about the CAPER will be accepted by the City Contact Person, or a designee, during the 15-day public display and comment period. The City will consider comments received during the public display and comment period in preparing the final CAPER. A summary of these comments, and a summary of any comments not accepted and the reasons why, will be attached to the final CAPER for submission to HUD.

d. CAPER Submission to HUD

The CAPER will be submitted to HUD within 90 days following the end of the City's annual program year, unless otherwise directed by HUD.

### **CAPER Access**

CAPERs will be kept on file at the Department of Neighborhood and Business Development, City Hall Rm 224B

They can also be accessed online at [www.cityofrochester.gov/ConsolidatedPlan2020to2024](http://www.cityofrochester.gov/ConsolidatedPlan2020to2024)

## **H. Section 108 Loan Guarantee Program**

### **Development of Section 108 Loan Guarantee Application**

Applications for assistance filed by the City for Section 108 Loan Guarantee assistance authorized under HUD regulation 24 CFR Part 570, Subpart M, are subject to all provisions set forth within this Plan. Such applications for Section 108 assistance may be included as part of the Consolidated Planning process or may be undertaken separately anytime during the City's program year.

Before the City submits an application for Section 108 loan guarantee assistance, the City will make available to residents, public agencies and other interested parties information that includes the amount of assistance the City expects to be made available (including program income), the range of activities that may be undertaken, the estimated amount that will benefit persons of low- and moderate-income, and any activities likely to result in displacement.

### **Section 108 Loan Application Public Display and Comment Period**

The City will publish its proposed Section 108 loan application for review and comment. The public notice shall include a summary describing the contents and purpose of the application and listing the locations where the entire application may be examined. An application for Section 108 Loan Guarantee funding shall be made available for public review for a 30-day period prior to consideration and submission to HUD and may be done concurrently with the public review and comment process for the Consolidated Plan.

Copies of the proposed Section 108 loan application will be made available for review at the following locations:

- City Hall: 30 Church St (Rm 224B), Rochester, NY 14614
- Northeast Neighborhood Service Center: 500 Norton St Rochester, NY 14621
- Northwest Neighborhood Service Center: 71 Parkway – 1<sup>st</sup> Floor Rochester, NY 14608
- Southwest Neighborhood Service Center: 923 Genesee St Rochester, NY 14611
- Southeast Neighborhood Service Center: 320 N Goodman St Rochester, NY 14607
- City of Rochester website: [www.cityofrochester.gov/ConsolidatedPlan2020to2024](http://www.cityofrochester.gov/ConsolidatedPlan2020to2024)

### **Comments Received on the Proposed Section 108 Loan Application**

Written comments on the proposed Section 108 Loan Application will be accepted by the Contact Person, or a designee, during the 30-day public display and comment period. The City will consider comments received during the public display and comment period in preparing the final application. A summary of these comments, and a summary of comments not accepted and the reasons why, will be attached to the final application for submission to HUD.

### **Section 108 Loan Application Submission to HUD**

The Section 108 Loan Application will be submitted to HUD.

## **I. Complaints**

Residents may register complaints regarding any aspect of the CDBG, HOME, ESG, or HOPWA programs by contacting the City Contact Person, or a designee. The City will make every reasonable effort to provide written responses within 15 days.

Residents wishing to object to HUD approval of the final Consolidated Plan may send written objections to the HUD Buffalo Field Office at US Department of HUD, Lafayette Court 465 Main Street, 2<sup>nd</sup> Floor Buffalo, NY 14203. Objections should be made within 30 days after the City has submitted any of the documents covered by this Plan to HUD. Any objections made will only be submitted to HUD for the following reasons:

- The City of Rochester's description of needs and objectives is plainly inconsistent with available facts and data
- The activities to be undertaken are plainly inappropriate to meeting the needs and objectives identified by the City
- The City does not comply with the requirements of the CDBG, HOME, ESG, or HOPWA programs or other applicable laws
- The City's proposed activities which are otherwise ineligible under the program regulations.

Objections shall include both an identification of requirements not met and available facts and data.