

## Consolidated Community Development Plan

### Citizen Participation Plan

#### Background

In 1995, the United States Department of Housing and Urban Development (HUD) consolidated into a single submission the planning and application aspects of the following four HUD community development formula grant programs: Community Development Block Grant (CDBG), Emergency Shelter (now Solutions) Grant (ESG), Home Investment Partnerships (HOME), and Housing Opportunities for Persons with AIDS (HOPWA). The reporting requirements for these programs were also consolidated.

The Department of Neighborhood and Business Development (NBD), Office of the Commissioner is the lead agency responsible for the consolidated plan submission and reporting to HUD. NBD's Bureau of Business and Housing Development is responsible for CDBG and the HOME Programs housing activities, ESG and HOPWA programs, and manages CDBG assisted business development activities. The Department of Recreation and Youth Services administers CDBG assisted public service projects. The Department of Environmental Services is responsible for CDBG assisted public facilities and improvements.

The City of Rochester encourages citizens to participate in the planning and implementation of the Consolidated Community Development Plan. Public meetings are held at times convenient for citizens and at locations within the program target areas that are accessible to the disabled. In addition, the City provides opportunities for citizens to submit written comments, proposals, and recommendations. It also publishes and distributes material in both English and Spanish upon request.

HUD requires the City to adopt a citizen participation plan for the consolidated planning, application, and reporting processes. The Plan also covers Section 108 Loan Guarantee Program.

#### Purpose

The Citizen Participation Plan establishes policies and procedures to encourage citizen involvement in planning for the use of federal funds that are available under the Community Development Block Grant (CDBG), Emergency Solutions Grant (ESG), Home Investment Partnership (HOME), and Housing Opportunities for Persons with AIDS (HOPWA). The City promotes citizen participation in the following activities:

- Development of the Consolidated Community Development Plan which contains a five-year strategic plan that outlines strategies and goals for use of federal funds;
- Development of each Annual Action Plan, which describes specific projects and activities that will be undertaken during the year with federal funds to address priority needs;
- Review and comment on substantial amendments to the Consolidated Community Development Plan and/or Annual Action Plan;
- Review and comment on the annual Consolidated Annual Performance and Evaluation Report which describes the process of implementing the Plan through the proposed actions identified in the Annual Action Plan; and,
- Review and comment on substantial amendments to the Citizen Participation Plan.

The City of Rochester encourages participation by low- and moderate-income persons, particularly those living in slum and blighted areas, and in areas where CDBG funds are proposed to be used, and by residents of predominantly low- and moderate-income neighborhoods. Predominantly low- and moderate-income neighborhoods are defined as those where 51% or more of the residents have incomes that are 80% or less of the median family income. Actions are taken to encourage participation by minorities, non-English speaking persons and persons with disabilities. Residents of public and assisted housing and other low-income residents of targeted revitalization areas in which public and assisted housing is located are also encouraged to participate.

#### Consolidated Community Development Plan and Action Plan

The City submits a Consolidated Community Development Plan every five years and an Action Plan each year to the U.S. Department of Housing and Urban Development (HUD).

The Consolidated Community Development Plan consists of a strategic plan and an annual action plan. The strategic plan contains a community development needs assessment, a housing market analysis, and long term strategies to meet priority needs. The annual action plan describes specific projects and activities that will be undertaken in the coming year with federal funds to address priority needs. The current Consolidated Plan covers the period from July 1, 2010 through June 30, 2015.

The City of Rochester may also participate in the Section 108 Loan Guarantee Program. Under the program, the City of Rochester may borrow from the federal government an amount equal to five times its annual Community Development Block Grant, using the grant as security. The City may then utilize these funds for eligible activities such as acquisition, rehabilitation, and economic development.

Among other input, the development of strategic plans for the four quadrant areas provides context and direction to the Consolidated Community Development Plan.

The Goals and Policy Priorities adopted by the Administration also guide the development of the plan. These include:

- Promote policies that grow the local economy, ensuring adequate jobs and income for all residents;
- Make investing in city properties an affordable and competitive alternative to the suburbs;
- Sustain safe and vibrant city neighborhoods and businesses;
- Maximize home ownership;
- Assist property owners in meeting their financial obligations so they have a better chance of retaining their properties;
- Encourage owners and tenants to maintain their properties in ways that enhance value and condition;
- Provide incentives to motivate property owners to comply with building codes, to maximize the need for enforcement.

The City consults with local public agencies that assist low and moderate income persons, including City staff, State and federal agencies, and neighboring local government and regional agencies. The City also consults with private agencies, including local nonprofit service providers and advocates such as the local public housing agency, health agencies, homeless service providers, nonprofit housing developers,

social service agencies (including those focusing on services to children, the elderly, persons with disabilities, persons with HIV/AIDS, and persons with substance abuse problems).

There are also opportunities for citizens, nonprofit organizations, and other interested parties to review and comment on a draft Annual Action Plan before its implementation.

The City's Housing Policy guides the allocation of CDBG and HOME resources available to the City of Rochester to address priority housing needs and specific objectives.

The City will hold a general meeting on March 24, 2014 in City Council Chambers to provide information on the plan and solicit input on community development and housing needs.

The City has sent a request to the Department of Housing and Urban Development for an extension for the submission of the Consolidated Community Development Plan/2014-15 Annual Action Plan. It is anticipated that the plan will be submitted by June 30, 2014.

A Draft Annual Action Plan will be prepared and published by April 19, 2014. In addition to the activities proposed to be undertaken, the Plan will detail the amount of federal assistance expected to be received (including grant funds and program income) and the range of activities that may be undertaken, including the estimated amount that will benefit persons of low and moderate income and the plans to minimize displacement of persons and to assist any persons displaced.

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 anti-displacement and relocation requirements of the Uniform Relocation Act and the Housing and Community Development Act of 1974, as amended, and implementing regulations of 24 CFR Part 42.

The City will publish a notice in the Democrat & Chronicle which will summarize the Consolidated Community Development Plan/Annual Action Plan. It will contain a description of the contents and purposes of the Plan and a list of locations where copies of the entire proposed Plan may be reviewed.

The Plan will be available at public libraries and copies will be available in the Department of Neighborhood and Business Development, and the Bureau of Communications in City Hall, which are accessible to the disabled. It will also be posted on the City's website. The City will make a reasonable number of free copies of the Plan to citizens and groups that request it. The Plan will be available for 30 days for comment.

The Draft Plan will be submitted to City Council for its consideration. The City will hold a public hearing on the draft Consolidated Community Development Plan. At this hearing, the public is invited to comment on all phases of the Plan, including housing and community development needs, proposed activities, and program performance. The City will consider any comments or views of citizens received in writing, or orally at public hearings in preparing the final Plan.

After the City Council adopts the Plan, it will be submitted to the United States Department of Housing and Urban Development for approval. Copies of the adopted Plan will be available in the Department of Neighborhood and Business Development, and the Communications Bureau in City Hall. A summary of

all comments received within the 30-day comment period will be included in the Final Plan that is submitted to HUD.

#### Submission of Comments and Proposals

The public is invited to make its views on needs and priorities known, as well as proposals for specific activities. These can be submitted in writing to Associate Administrative Analyst, Room 224B, City Hall, 30 Church Street, Rochester, New York 14614. Responses to written submissions will be provided.

#### Technical Assistance

City staff is available upon request to help citizens and groups adequately participate in all aspects of the planning of the Consolidated Community Development Program. All requests for technical assistance should be directed to Associate Administrative Analyst, Room 224B, City Hall, 30 Church Street, Rochester, New York 14614.

#### Bilingual Services

This year, as in the past, bilingual services will be provided to the Hispanic community. Information handouts will be made available in Spanish, if requested. Bilingual assistance is also available upon request to help interpret information.

#### Comments and Complaints

The City will consider any comments or views of citizens received in writing or orally at public hearings in preparing the final Consolidated Community Development Plan, amendments to the Plan or the Consolidated Annual Performance and Evaluation Report. A summary of these comments or views and a summary of any comments or views not accepted and the reasons will be attached to the final Consolidated Community Development Plan, amendments to the Plan or Performance Report.

Any complaints regarding this Citizen Participation Plan or the development or implementation of the Consolidated Community Development Plan should be addressed to Associate Administrative Analyst, Department of Neighborhood & Business Development, Room 224B, City Hall, 30 Church Street, Rochester, NY 14614. The City will make every reasonable effort to provide written responses within 15 days.

#### Publicity

The meetings and public hearings will be publicized through the use of newspaper ads, press releases, posting on the City's website, or direct mailings to sector committees. Adequate advance notice with sufficient information about the subject will be provided to permit informed comment.

#### 2014-15 Consolidated Community Development Plan/Implementation Phase

The implementation phase of the Plan will begin on July 1, 2014. There are also opportunities for participation in the implementation and evaluation of the Plan's performance.

## Plan Implementation and Community Involvement

The first step in implementing the various activities funded by the Consolidated Community Development Plan is appropriation of funds by City Council. Such action will take place throughout the program year.

## Amendments

The need may arise during implementation to modify or amend the approved Annual Plan. Certain changes will be minor in nature and will not require public notification or citizen participation prior to the implementation of such changes. Other changes, defined as substantial, will require public notification and public review. The following changes are considered substantial amendments to the Consolidated Community Development Plan/Annual Action Plan:

- To make a substantial change in its allocation priorities or a substantial change in the method of distribution of funds;
- To carry out an activity, using funds from any program covered by the Consolidated Plan (including program income) not previously described in the action plan;
- Increasing or decreasing an activity's budget by more than 25%;
- Providing interim financing such as a "float loan";
- Transferring funds from a contingency;
- To change the purpose, scope, location or beneficiaries of an activity; or
- A Section 108 Loan that was not described in the Plan.

The City will publish a notice which will inform the public of the proposed changes and locations where a copy of the draft amendment may be reviewed. Interested parties will have 30 days to provide written comments on the proposed amendment. The City Council will hold a public hearing prior to considering amendments to the Plan. A description of the amendment(s) will be available at the hearing. A summary of all comments received within the 30 day period will be included in the substantial amendment to the Consolidated Community Development Plan/Annual Action Plan that is finally submitted to HUD.

## Program Performance

The City of Rochester converted to the Integrated Disbursement and Information System in December 1996. The system enables the City to review a program's progress and monitor its performance on an ongoing basis.

A written Consolidated Annual Performance and Evaluation Report will be prepared annually. The report will contain a summary of resources and programmatic accomplishments, the status of actions taken to implement the strategy contained in the Consolidated Community Development Program, and evaluation of progress made during the year in addressing identified priority needs and objectives.

The City will publish a notice in the Democrat and Chronicle which will inform the public of the availability of the CAPER for review and comment and the locations where a copy of the draft document may be reviewed. Copies of the report will be available in the Department of Neighborhood and Business Development and the Communications Bureau in City Hall.

Interested parties will have 15 days to provide written comments on the report. A summary of all comments received within the 15-day period will be included in the CAPER that is finally submitted to HUD.

### Records

The City of Rochester will provide reasonable and timely access to information and records relating to the Consolidated Plan and use of funds during the preceding five years, if available. Due to staff limitations, the City may not be able to analyze information and prepare specialized reports.

Copies of the following documents pertaining to the Consolidated Community Development Program and Annual Action Plan will be on file as they become available for public examination during regular business hours at the Rundel Library (Local History Division) located at 115 South Avenue and the Department of Neighborhood and Business Development (City Hall, Room 224 B, 30 Church Street, Rochester, NY):

1. Citizen Participation Plan
2. Draft Consolidated Community Development Plan
3. Final Consolidated Community Development Plan
4. Performance and Evaluation Report

Copies of these documents are also available by request.