



# CITY OF SARATOGA SPRINGS CITIZEN PARTICIPATION PLAN

for the Community Development Block Grant Program

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Adopted by City Council: June 2, 2020

## **I. Public Participation**

The Citizen Participation Plan is established to encourage broad public participation in the development, implementation, and ongoing assessment of the City's Community Development Block Grant (CDBG) Entitlement Program including:

- Development of a "Consolidated Plan" identifying housing and non-housing community development priority needs and the multi-year strategic plan to address these needs.
- Development of an annual Action Plan of Entitlement-funded activities.
- "Substantial" amendments to approved Consolidated and Action Plans.
- Review and assessment of the Consolidated Annual Performance and Evaluation Report (CAPER).

## **II. Substantial Amendment**

A "Substantial Amendment" to a Consolidated Plan or annual Action Plans shall be defined as:

- Carrying out an activity not identified as a priority in the approved Consolidated Plan.
- Carrying out an activity not approved in an annual Action Plan.
- A substantial change in the purpose of an activity approved in an annual Action Plan.
- A substantial change in the scope of an activity approved in an annual Action Plan.
- A change in the use of Entitlement funds (exceeding \$30,000) from one approved activity to another.

## **III. Focused Outreach**

Since the purpose of the City's community development program is to increase the availability of decent, affordable housing, enhance the living environment, and increase economic opportunity for its residents of low and moderate income, the City especially encourages input and participation from:

- Residents of predominantly low-moderate income areas or areas of significant Entitlement investment.
- Residents of public and assisted housing including recipients of tenant-based assistance and the public housing authority.
- Minority, elderly, and disabled residents.

## **IV. Community Development Citizen Advisory Committee**

The City has established a Community Development Citizen Advisory Committee (CDCAC) to promote broad public participation and assist in the development, implementation, and evaluation of the community development program. This CDCAC shall have the following characteristics:

- The CDCAC shall serve in an advisory capacity to the City Council and Office of Community Development.
- The CDCAC shall have no more than 12 members to be appointed by the Mayor. The Chair shall be designated by the Mayor.
- The CDCAC shall broadly represent the diversity of the City and include, to the extent possible, persons of low and moderate income, residents of public and assisted housing, residents of areas of Entitlement investment, members of minority groups, the elderly, the disabled, the business community, and civic groups that are concerned with the community development program.
- Four CDCAC members shall be appointed at a time on an annual rotating basis to serve 3-year terms commencing at the start of the federal program year (currently July 1).
- Members not attending 60% of scheduled meetings in a program year may be replaced by the Mayor.

## **V. CDBG Guidebook**

To assist in clarifying the Community Development Block Grant program and provide a reader-friendly summary of the City's funding priorities and application process, the City will provide "A Guide to the Community Development Block Grant (CDBG) Entitlement Program." This document shall be available on the Community Development page of the City's web site: [www.saratoga-springs.org](http://www.saratoga-springs.org), and at the Community Development Department, City Hall – 474 Broadway, Saratoga Springs, NY. Hard copies shall be made available upon request in accordance with the City's fee policy for copies.

## **VI. Technical Assistance and Efforts to Broaden Public Participation**

Technical assistance shall be provided, within the limits of available staff and resources, to the CDCAC and groups representative of low- and moderate-income persons that request such assistance in developing proposals for funding assistance under any of the programs covered by the Consolidated Plan.

Individual meetings with Community Development staff are available for those citizens and groups who are unable to attend the scheduled public meetings or who wish a more in-depth understanding of the CDBG process. Community Development staff also consult with a variety of other public and private agencies on an ongoing basis concerning housing, human services, economic development and other community needs including: Saratoga Housing Alliance, Saratoga-North Country Continuum of Care, Saratoga Springs Housing Authority, Shelters of Saratoga, Saratoga Senior Center, Saratoga Prosperity Partnership, and various other non-profit organizations serving individuals of low-mod income and presumed benefit.

## **VII. Document Review**

The City may adopt a Consolidated Plan, annual Action Plan, or Substantial Amendment only after residents, public agencies, and other interested parties, including those most affected, are provided with the opportunity to review and submit comment on the following (as applicable):

- Description of community development priorities.
- Description of activities to be undertaken.
- Amount of expected assistance (grant funds and program income).
- Estimated amount expected to benefit residents of low and moderate income.
- Plan to minimize displacement of persons and to assist any persons displaced.

The Consolidated Plan, annual Action Plans, Substantial Amendments to these Plans, and CAPER are available for review to all interested parties at the following locations:

- Office of Community Development, City Hall, 474 Broadway, Saratoga Springs, NY (518) 587-3550
- The Community Development page of the City of Saratoga Springs website: [www.saratoga-springs.org](http://www.saratoga-springs.org)

Hard copies of these documents may be obtained from the Community Development Department in accordance with the City's fee policy for copies. Provisions of the Freedom of Information Act of 1966, as amended, will control the City's response to any documentation or information requests from the public on any and all CDBG activities. Requests for provision of these documents in a form accessible to persons with disabilities will be granted, including large-format and digital editions.

## **VIII. Public Hearings & Notifications**

For this Citizen Participation Plan, the term Public Hearing includes virtual hearings.

The City will post a notice of the proposed Consolidated Plan, annual Action Plans, Substantial Amendments to the Plans, and CAPERs on the City's website and social media accounts at the beginning of each public comment period to provide interested parties the opportunity to review and submit comments on these documents. This notice will describe the contents and purpose of the proposed Plans, identify the locations where documents may be examined and specify how and where comments may be directed. Additionally, these notices will be posted in common public spaces within City Hall and the Public Housing Authority.

The City will publish at least five (5) days before any formal Public Hearing a notice in the City's paper of record indicating the date, time, place, and procedures of the Public Hearing with sufficient information about the subject of the hearing to permit informed comment.

In addition, all public meetings relating to proposed Consolidated Plan, annual Action Plans, Substantial Amendments to the Plans, and CAPERs will be noticed on the City's website: [www.saratoga-springs.org](http://www.saratoga-springs.org).

## **IX. Public Meetings**

At least one formal Public Hearing will be held before a proposed Consolidated Plan, annual action plan or Substantial Amendment is approved by the City Council. In addition, the CDCAC will hold at least one community meeting each program year to receive public input and to respond to proposals and questions regarding the Consolidated Plan and/or annual Action Plan (as applicable). Together, these public meetings are intended to encourage public awareness and participation in addressing housing and community development needs, developing coordinated and sound activity proposals for each Consolidated Plan annual Action Plan, and in general review of program performance.

## **X. Special Needs Accommodations**

Special arrangements to accommodate non-English speaking persons will be made in accordance with the City's Language Assistance Plan. Accommodations for persons with visual or hearing impairments will be made upon request.

## **XI. Accessibility**

All public meetings of the CDCAC shall be conducted in an open manner with freedom of access for all interested persons. Public meetings shall be held in facilities accessible to the mobility-impaired, with accommodation for persons with visual and hearing disabilities available upon request, and in locations that promote attendance by residents of low and moderate income - low and moderate income areas, and areas of significant Entitlement investment. In general, the meetings shall be held at times outside of the traditional workday to avoid conflict with the traditional 9 to 5 work week. The needs of non-English speaking residents will be met in accordance with the City's Language Assistance Plan.

## **XII. Public Comment**

The Office of Community Development shall receive written comment from interested parties on proposed Consolidated and Action Plans, Substantial Amendments to these Plans, and CAPERs before these documents are submitted to the U.S. Department of Housing and Urban Development. The City shall consider these written and oral Public Hearing comments and attach a summary of these comments in its final document.

The public comment period for proposed Consolidated Plan, annual Action Plans, and Substantial Amendments to these Plans shall be a minimum of 30 days. The public comment period for CAPERs shall be a minimum of 15 days.

For CDBG funding under FY 2019-2020, FY 2020-2021, and the Coronavirus Aid, Relief, and Economic Security Act or CARES Act, participating cities may provide a 5-day notice/comment period beginning April 8, 2020 as allowed under a HUD waiver. This includes newly proposed Consolidated or Action Plans, as well as Substantial Amendments. Under this same waiver, public hearings are permitted to be held virtually.

### **XIII. Disaster/Emergency Events and Expedited Public Participation Procedures**

It may be necessary to expedite review and public participation procedures for Substantial Amendments and/or newly proposed Plans in the event of a declared disaster or emergency. There are three types of disasters/emergency events that may necessitate expedited procedures including (1) Man-Made-disasters, (2) Natural disasters, and (3) Terrorism. Man-made disasters can include chemical spills, mass rioting, power outages, dam failure, plant explosions, etc. Natural disasters can include earthquakes, tsunamis, hurricanes, tornadoes, wild fires, flooding and public health issues such as wide-spread disease, etc. including the recent coronavirus disease 2019 (COVID-19). Terrorism events include bomb threats, biochemical attacks like the spread of anthrax, or cyber-attacks like hacking, phishing, and virus distribution, etc.

Expedited Substantial Amendments and newly proposed Plans may include funding new activities and/or the reprogramming of funds including canceling activities to meet needs resulting from a declared disaster or emergency. Therefore, the City of Saratoga Springs may utilize CDBG funds to meet these needs with a 5-day public comment period instead of a 30-day public comment period, which is otherwise required for Substantial Amendments and newly proposed Plans.

Additionally, community meeting(s) held by CDCAC may be suspended in the event of a qualifying disaster or emergency event.

### **XIV. Anti-displacement**

The City of Saratoga Springs will administer its Community Development Block Grant program in full compliance with federal anti-displacement strategies. The city will undertake a range of steps to minimize displacement of residents including the following:

- The City of Saratoga Springs will not include activities that will result in residential displacement under its Community Development Block Grant programs unless the City determines that the overall public benefit of such activities is sufficient to allow their implementation
- Where such activities which will produce sufficient public benefit to allow implementation are proposed, the City will consider all appropriate alternative sites prior to approving the activities and will give preference, all other conditions being equal, to those sites resulting in the least displacement of residential households.
- The City of Saratoga Springs will provide location assistance, as described in 24 CFR 570.606(b)(2), to each household displaced by demolition of housing or by the conversion of a low/moderate income to another use as a direct result of assisted activities. It is understood that any person may elect assistance under the Uniform Relocation Assistance Act in lieu of the assistance described in 24 CFR 570.606(b)(1).

## **XV. Complaint Procedures**

The City of Saratoga Springs assures that it will provide for a timely, substantive written response to every written citizen complaint within fifteen working days, where practicable. In the event that a concern is of a more complex nature, the Office of Community Development shall respond within 15 days with an estimation of the time required to adequately address such concern. All citizen complaints regarding the Consolidated Plan, amendments, and CAPERs shall be accepted via email to the current Community Development Planner, whose email address shall be made available on the Community Development page of the City's website – [www.saratoga-springs.org](http://www.saratoga-springs.org).