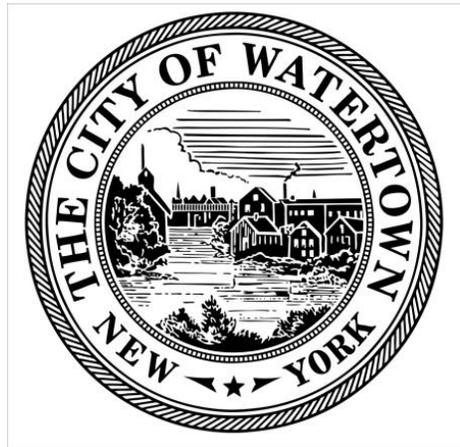


CITIZEN PARTICIPATION PLAN

City of Watertown, New York
Community Development Block Grant Program



City of Watertown
Planning and Community Development Department
245 Washington Street
Watertown, NY 13601
Phone: (315) 785-7730

Prepared by the City of Watertown Planning Office
Date of Adoption: April 6, 2020

DRAFT Amendment: July 24, 2020
Proposed amendment pursuant to the CARES Act

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City of Watertown, New York Community Development Block Grant Program Citizen Participation Plan



Introduction

This Citizen Participation Plan is adopted in accordance with Section 104 (a) (3) of the Housing and Community Development Act of 1974 and Federal regulations (24 CFR 91.105) and is intended to serve as a guide for how the City of Watertown (the City) will involve citizens in the process of developing its Community Development Block Grant (CDBG) Program. The following Citizen Participation process will ensure that residents and community organizations have ample opportunity to review and comment on the City's CDBG Program, the Consolidated Plan and the Annual Action Plans and the Consolidated Annual Performance and Evaluation Report.

The law requires that this Citizen Participation Plan outline ways in which the City will provide for and encourage citizen participation, with an emphasis on low-and-moderate income people, particularly those who reside in low-and-moderate income neighborhoods, defined as areas where at least 51 percent of households have incomes at or below 80 percent of the Area Median Income (AMI). The City will strive to exceed the U.S. Department of Housing and Urban Development's (HUD) requirements by involving its citizens and those community groups most familiar with the needs of low and moderate income people. This strategy will provide meaningful citizen participation that will improve the quality of the services and programs that the CDBG Program provides and will make the City's Consolidated Plan truly representative of the community's needs.

Targeted Groups and Populations for Citizen Participation

The City of Watertown will encourage its citizens to participate in all aspects of its Community Development Block Grant Program. In preparing the Citizen Participation Plan, Consolidated Plans, as well as all Annual Action Plans and Consolidated Annual Performance and Evaluation Reports (CAPER), the City shall contact, inform, and encourage participation by public and private agencies that provide assisted housing, health and social service agencies, homeless service providers, child welfare agencies regarding lead-based paint, and other agencies that serve the low-to-moderate income population in the City. The City will also contact adjacent units of local government for community development needs, economic development agencies, local and regional institutions and other relevant organizations.

The City has identified the following constituency groups and organizations that it will particularly target for outreach efforts when developing the Citizen Participation Plan, Consolidated Plan, Annual Action Plan, CAPER and when providing notice of pending meetings and public hearings:

AIDS Community Resources, Inc.
Association for the Blind and Visually Impaired of NNY
Catholic Charities
Citizens Advisory Board (Advantage Watertown)
Community Action Planning Council of Jefferson County
Credo Community Center for the Treatment of Addictions
Development Authority of the North Country
Disabled Persons Action Organization
Fort Drum Regional Health Planning Organization
Jefferson County Department of Social Services
Jefferson County Industrial Development Agency
Jefferson County Office for the Aging
Jefferson County Planning Department
Jefferson County Public Health
Lewis County Opportunities, Inc.
Neighbors of Watertown, Inc.
North Country Affordable Housing, Inc.
North Country Family Health Center
Northern New York Community Foundation, Inc.
Northern Regional Center for Independent Living, Inc.
Points North Housing Coalition
The WorkPlace
Town of Leray
Town of Pamela
Town of Watertown
Transitional Living Services of NNY
Tug Hill Commission
Victims Assistance Center of Jefferson County, Inc.
Watertown Housing Authority
Watertown Local Development Corporation
Watertown Urban Mission

Citizen Comment on the Citizen Participation Plan and Amendments

The City's original Citizen Participation Plan and subsequent amendments to it are subject to full disclosure, review and public comment prior to the approval of the plan by the City Council. Prior to taking action on the Citizen Participation Plan and approving any substantial amendments to it in the future, the City shall take the following steps:

1. Full copies of the Citizen Participation Plan and amendments to it will be made available for public viewing at the following locations:

- City of Watertown Clerk's Office, City Hall, 245 Washington St., Watertown, NY 13601
- City of Watertown Planning Department, City Hall, 245 Washington St., Watertown, NY 13601
- City of Watertown's website at www.watertown-ny.gov
- Roswell P. Flower Memorial Library, 229 Washington Street, Watertown, NY 13601
- Watertown Housing Authority Offices, 142 Mechanic Street, Watertown, NY 13601

The copies will be made available to the public a minimum of 15 calendar days before the City of Watertown's public hearing on the Citizen Participation Plan or subsequent amendments. Any citizen, agency or business may also request that a free copy of the plan be mailed to them. The plan will be placed in a format accessible to persons with disabilities or non-English speaking individuals, upon request. There will be a 30 day comment period for citizens to comment on the Citizen Participation Plan or subsequent amendments.

2. The City Council will schedule a public hearing on the plan or any substantial amendments. The City will place an advertisement in the City's official newspaper, the *Watertown Daily Times*, notifying the public of the date, time and location of the public hearing and the availability of the plan or future amendments. The notice will be published a minimum of 15 days prior to the hearing and will include information on where to view the plan, how to request a copy and will include information on how citizens can comment on the plan.
3. The City Planning Department will issue a separate notice via email to all constituency groups and organizations identified above, notifying them of the public hearing and that the Citizen Participation Plan or amendment is available for review and comment.
4. Planning Department Staff and the City of Watertown City Council will consider any comments or views of citizens received in writing, or orally at the public hearing. A summary of public comments will be developed and included as an appendix to the plan.
5. At a City Council meeting after the public hearing and at the conclusion of the 30 day comment period, the City Council will take action on the Citizen Participation Plan or any substantial amendments to it.

Citizen Comment on the Consolidated Plan and Annual Action Plans

The Consolidated Plan serves as a planning document as well as a vehicle for establishing project funding priorities. This section of the Citizen Participation Plan describes how the City plans to gather citizen input to inform funding priorities and projects for each fiscal year and the development of the Annual Action Plan.

The City's Consolidated Plan and Annual Action Plans are subject to full disclosure, review and public comment prior to the approval of the plan by the City Council of the City of Watertown. Prior to taking action on the Consolidated Plan and Annual Action Plans, the City shall take the following steps:

1. The City Council will schedule a public hearing to obtain input from citizens, involved agencies and interested persons on activities proposed for inclusion in the Consolidated Plan and/or Annual Action Plan. The public hearing will be advertised in the City's official newspaper, *Watertown Daily Times* notifying the public of the date, time and location of the public hearing. The City will publish the notice a minimum of 15 days prior to the hearing date and will hold the hearing at the start of the development of the Consolidated Plan and/or Annual Action Plan. Provisions will be available at the hearing for non-English speaking residents, upon request, in the case where a significant number of non-English speaking residents might likely participate.
2. The City Planning Department will issue a separate notice via email to all constituency groups and organizations identified above, notifying them that the planning process for drafting the Consolidated Plan and/or the Annual Action Plan is beginning.
3. The City Planning Department will then schedule meetings with any interested constituency groups and organizations to identify community needs, obtain input, determine funding priorities and develop potential projects ideas.
4. Following the public hearing and outreach to constituency groups and organizations, the City will then prepare a draft of the Consolidated Plan and/or Annual Action Plan. Following the preparation of the draft plan(s), the City will notify the public by placing an advertisement in the *Watertown Daily Times* that the draft plan(s) is available. The notice will include a summary of the proposed Consolidated Plan and/or Annual Action Plan. The notice will also include information on where to view the plan, how to request a copy and will include information on how citizens can comment on the plan. There will be a 30 day comment period for citizens to comment on the Consolidated Plan and/or Annual Action Plan. The draft plan(s) will include the following:
 - The amount of CDBG funds the City expects to receive for the coming year, including the grant and anticipated program income.
 - The range of activities that the City may undertake with CDBG funds.
 - The estimated amount of funds the City proposes to use for activities that will benefit low and moderate-income person.

- Any displacement that may occur as a result of CDBG activities and the City's plans, consistent with policies developed under Section 570.606(b), for minimizing displacement of persons as a result of proposed activities.
 - The types and levels of assistance the City plans to make available (or require subrecipients to make available) to persons displaced by CDBG funded activities, even if the City expects no displacement to occur.
5. Full copies of the draft Consolidated Plan and/or Annual Action Plan will be made available for public viewing at the following locations:
- City of Watertown Clerk's Office, City Hall, 245 Washington St., Watertown, NY 13601
 - City of Watertown Planning Department, City Hall, 245 Washington St., Watertown, NY 13601
 - City of Watertown's website at www.watertown-ny.gov
 - Roswell P. Flower Memorial Library, 229 Washington Street, Watertown, NY 13601
 - Watertown Housing Authority Offices, 142 Mechanic Street, Watertown, NY 13601

Any citizen, agency or business may also request that the City mail a free copy of the plan to them. The plan(s) will be placed in a format accessible to persons with disabilities or non-English speaking individuals, upon request.

6. The City will record all comments received in writing or orally at the public hearing and will consider them in formulating the final plan. A summary of these comments or views, and a summary of any comments or views not accepted and the reasons therefor, will be included in the Plan.
7. At the conclusion of the of the 30 day comment period, the City will finalize the Consolidated Plan and/or Annual Action Plan. The City Council will then take action to adopt the plan(s). The City will then submit the adopted plan to HUD 45 days prior to the start of the next program year. The City will also make the adopted plan available to the public for viewing at the City's Planning Department, as well as on its website. Free copies of the final plan will be available to the public at anytime upon request.

Citizen Comment on the Consolidated Annual Performance and Evaluation Report

The City of Watertown will monitor all projects to determine the effectiveness of its CDBG Program in meeting the described goals in the Consolidated Plan. At the conclusion of each program year, the City will submit a Consolidated Annual Performance and Evaluation Report (CAPER) to HUD. The CAPER is subject to full disclosure, review and public comment prior to the submission of it to HUD. Prior to taking action on the CAPER, the City shall take the following steps:

1. The City Planning Office will complete the draft CAPER and make copies of it available for public viewing at the following locations:
 - City of Watertown Clerk's Office, City Hall, 245 Washington St., Watertown, NY 13601
 - City of Watertown Planning Department, City Hall, 245 Washington St., Watertown, NY 13601
 - City of Watertown's website at www.watertown-ny.gov
 - Roswell P. Flower Memorial Library, 229 Washington Street, Watertown, NY 13601
 - Watertown Housing Authority Offices, 142 Mechanic Street, Watertown, NY 13601

The City will make these copies available to the public a minimum of 15 calendar days before a scheduled public hearing for review and comment. Free copies of the CAPER will be available to the public upon request.

2. The City Council will schedule a public hearing on the CAPER and will place an advertisement in the City's official newspaper, the *Watertown Daily Times*, notifying the public of the availability of the CAPER for public viewing and comment. The City will publish the notice a minimum of 15 days prior to the public hearing date and will include information about the date, time and location of a public hearing that will be held. The advertisement will also include information on where to view the CAPER, how to request a copy and will include information on how citizens can comment on the CAPER.
3. The City Planning Department will issue a separate notice via email to all constituency groups and organizations identified above, notifying them that the CAPER is available for review and comment.
4. Planning Department Staff and the City of Watertown City Council will consider all comments or views of citizens received in writing, or orally at the public hearing. A summary of these comments or views will be developed and included in the CAPER submission to HUD.

Substantial Amendments to the Consolidated Plan and Annual Action Plan

Occasionally, it may be necessary for the City to process a "Substantial Amendment" to the Consolidated Plan or the Annual Action Plan to allow for new CDBG funded activities or to modify existing activities. The City will solicit and provide for citizen participation in all instances where a substantial amendment is necessary. The City is required in accordance with 24 CFR 91.505 (b) to define the criteria it will use for determining what constitutes a substantial amendment. The following criteria will be used by the City:

1. A substantial change in allocation priorities (any change greater than 25 percent in an individual project budget) or a substantial change in the method of distribution of funds.

2. To carry out an activity, using funds from any program covered by the Consolidated Plan (including program income), not previously described in the Annual Action Plan.
3. To change the purpose, scope, location, or beneficiaries of an activity by more than 25percent of the total funds previously authorized.

Changes that are not considered substantial amendments:

1. Changes to the CDBG budget for a project by an amount that is less than 25percent.
2. Consolidated Plan data updates such as census data, income limits and fair market rents, home subsidy limits and similar types of data shall not be considered a substantial amendment.
3. Minor change in project location. A minor change in location is not considered a substantial change as long as the purpose, scope, and intended beneficiaries remain essentially the same.
4. Project budget line item change: The transfer of some (but not all) funds within a project from one approved budget line item to another approved budget line.

When the City determines that a substantial amendment to the Consolidated Plan or Annual Action Plan is necessary, the City will provide an opportunity for public comment. Amendments are subject to full disclosure, review and public comment prior to the approval of the amendment by the City Council. Prior to taking action on any substantial amendments, the City shall take the following steps:

1. The City Council will schedule a public hearing to obtain input from citizens, involved agencies and interested persons on the proposed amendment. The public hearing will be advertised in the City's official newspaper, the *Watertown Daily Times*, notifying the public of the date, time and location of the public hearing. The notice will be published a minimum of 15 days prior to the hearing date and will include information about the proposed amendment.
2. There will be a 30 day public comment period for citizens to comment on the proposed amendment to the consolidated plan. The only exception to the 30 day public comment period is such a case in which this requirement is waived by HUD.
3. The City Planning Department will issue a separate notice via email to all constituency groups and organizations identified above, notifying them of the proposed amendment.
4. The City will make full copies of the proposed amendment will available for public viewing at the following locations:
 - City of Watertown Clerk's Office, City Hall, 245 Washington St., Watertown, NY 13601

- City of Watertown Planning Department, City Hall, 245 Washington St., Watertown, NY 13601
- City of Watertown's website at www.watertown-ny.gov
- Roswell P. Flower Memorial Library, 229 Washington Street, Watertown, NY 13601
- Watertown Housing Authority Offices, 142 Mechanic Street, Watertown, NY 13601

Any citizen, agency or business may also request that a free copy of the amendment be mailed to them. The amendment will be placed in a format accessible to persons with disabilities or non-English speaking individuals, upon request.

5. The City will record all comments received in writing or orally at the public hearing and consider them in preparing the amendment. A summary of these comments or views, and a summary of any comments or views not accepted and the reasons therefor, will be included in the Plan.
6. At the conclusion of the of the 30-day comment period, the City will finalize the amendment. The City Council will then take action to adopt the amendment. The City will make the adopted amendment available to the public for viewing at the City's Planning Department as well as on its website, and shall keep a copy on file at the locations noted above. Free copies of the final plan will be available to the public at any time upon request.
7. The City will then submit a copy of the amendment to HUD.

Standard Policies and Procedures for Citizen Participation

The City of Watertown encourages all its residents to participate and comment on proposed and actual uses of CDBG funds. The following policies and procedures are designed to encourage and accommodate such participation:

1. Availability to the Public – The City shall keep all drafts and final documents related to the City's CDBG Program including the Citizen Participation Plan, the Consolidated Plan, Substantial Consolidated Plan Amendments, the Annual Action Plan and the CAPER, and make them available at the following locations:
 - City of Watertown Clerk's Office, City Hall, 245 Washington St., Watertown, NY 13601
 - City of Watertown Planning Department, City Hall, 245 Washington St., Watertown, NY 13601
 - City of Watertown's website at www.watertown-ny.gov
 - Roswell P. Flower Memorial Library, 229 Washington Street, Watertown, NY 13601
 - Watertown Housing Authority Offices, 142 Mechanic Street, Watertown, NY 13601

Any citizen, agency or business may also request that the City mail a free copy of any of these documents to them. The documents will be placed in a format accessible to persons with disabilities or non-English speaking individuals, upon request.

2. Meetings, Information, and Access to Records - The City will give timely and reasonable notice of, and access to, local meetings and hearings where CDBG matters are planned for discussion. This will be accomplished through local media notification and posting of meeting and hearing notices. Furthermore, records and

information relating to CDBG plans and activities will also be available to the public (as may be limited by confidential individual statistics and New York State Freedom of Information Laws).

3. Technical Assistance - The City Planning Department will provide technical assistance to groups representing low-to-moderate-income individuals in developing supporting or alternative proposals for CDBG programming. This assistance will be considered if requested and if Staff resources are available. The level and type of assistance available will be at the City's discretion. Availability of such technical assistance shall be regularly evaluated and documented.
4. Public Hearings - The City will hold at least two public hearings annually at different stages of the CDBG process. Exact scheduling will depend on CDBG funding cycles. These hearings will address the City's housing needs, development of proposed activities, and review of program performance. One hearing will be held during the development of the City's Consolidated Plan and/or Annual Action Plan. One hearing will also address the City's Consolidated Annual Performance Evaluation Report (CAPER). All public hearings will occur during evening hours at Watertown City Hall, 245 Washington Street, Watertown, NY 13601, in the City Council Chamber, Room 303. Both City Hall and the meeting room are accessible to persons with disabilities. Notice of the hearings will conform to City Law. Materials will be provided, if requested, in formats suitable for the visually and hearing impaired.
5. Special Language Accommodations - Accommodations will be available upon request at public hearings to meet the needs of non-English speaking residents where a significant number of non-English speaking residents might likely participate. However, given the low percentage of non-English speaking residents within the City, participation in such numbers is unlikely.
6. Citizen Complaints - The City will respond to all written citizen complaints regarding the City's CDBG programs within 15 working days of receiving such complaints.
7. Citizen Participation by Low and Moderate Income Residents - To encourage participation by low and moderate-income residents, the City will provide notices of hearings and CDBG planning sessions to the non-profit housing agencies and human service organizations listed above. These agencies are representative of groups that directly assist the City's low-and-moderate-income population. Through this notification process, these agencies will be encouraged to notify beneficiaries of the CDBG planning process and the opportunities for input through this Citizen Participation Plan.
8. Publication of Consolidated Plan/Annual Action Plan - The City will publish a summary of any proposed CDBG Consolidated Plan and/or Annual Action Plan in the City's official newspaper. Such summary will briefly describe the contents of the Consolidated Plan, the proposed activities to be undertaken and their relationship to

local community objectives. The summary will inform the public when full versions of the Consolidated Plan will be available for review.

The public will have the opportunity to examine the Plan’s contents and submit comments on the Plan and the performance of the applicant. The availability of the annual Consolidated Annual Performance and Evaluation Report (CAPER) is also published to give citizens the opportunity to comment on the City’s performance with regard to its CDBG programs.

9. Preparation of Final Consolidated Plan - The final Consolidated Plan will include consideration, if appropriate, of comments and views received during the comment period for the proposed Consolidated Plan. As with all requests for Federal assistance, the final Plan will be available for public review.

Anti-Displacement Policies

The City of Watertown will administer its CDBG Program in full compliance with federal anti-displacement strategies. Before obligating or expending funds that will directly result in such demolition or conversion, the City will make public and submit to the Buffalo Field Office of HUD all required information including a description of the assisted activity, the general location on a map, number of dwelling units affected, a time schedule, the general location and number of proposed replacement units, the source of funding for replacement units, and the basis for concluding that each replacement unit will remain a low and moderate income unit for at least ten years from the date of initial occupancy.

Program Year and Citizen Participation Schedule

Start of Program Year – July 1st

Consolidated Plan and/or Annual Action Plan public hearing	Mid March
Consolidated Plan and/or Annual Action Plan 30-day public comment period	April 1 st – May 1 st
City Council vote authorizing submission of the Consolidated Plan and/or Annual Action Plan	1 st week in May
Consolidated Plan and/or Annual Action Plan submission deadline	May 15 th
End of program year	June 30 th
CAPER Available in draft form for citizen review and comment	September 1 st
Public Hearing on program performance	3 rd week in September
CAPER submission to HUD	September 30 th

Summary of Public Comments Received on the Citizen Participation Plan

A 30-day public comment period on the City's draft Citizen Participation Plan was held from February 14, 2020 through March 15, 2020. A public hearing was also held on the plan on March 16, 2020. The City made copies of the plan available for public viewing at City Hall, the Flower Memorial Library, at the Watertown Housing Authority main office at 140 Mechanic Street and on the City's web site. The City also distributed the draft plan to local constituency groups and organizations identified on page three of the plan and notified them of the hearing date.

During the 30-day public comment period and during the public hearing, the City did not receive any comments on the draft Citizen Participation Plan. Therefore, the City made no changes to the draft plan and the City Council adopted it on April 6, 2020.

CARES Act Amendment to the Citizen Participation Plan– August 2020

The Coronavirus Aid, Relief and Economic Security Act (CARES Act) provides the United States Department of Housing and Urban Development (HUD) with the ability to grant regulatory waivers and alternative requirements to entitlement grantees. Specifically, the CARES Act provides that grantees may establish expedited procedures in their Citizen Participation Plans for amendments to the Annual Action Plan and Consolidated Plan. By adopting this amendment to the City’s Citizen Participation Plan, the City plans to utilize the expedited procedures so that CARES Act CDBG Coronavirus funding can be programmed and utilized quickly and efficiently.

Expedited procedures must include reasonable opportunity to comment of no less than five days. The five-day period may run concurrently for comments on an Annual Action Plan or Consolidated Plan amendment and amended Citizen Participation Plans.

The following are the expedited procedures that will be available with this amendment:

Public Hearing Requirements: Under expedited procedures, and in the interest of public health and safety, grantees may fulfill public hearing requirements with virtual public hearings if:

1. national/local health authorities recommend social distancing and limiting public gatherings for public health reasons; and
2. virtual hearings provide reasonable notification and access for citizens in accordance with the grantee’s certifications, timely responses from local officials to all citizen questions and issues, and public access to all questions and responses.

Additionally, a public comment notice must still include sufficient information about the purpose of the public hearing to permit informed comments from the citizen.

Notice(s) for Public Comment: Under expedited procedures, a notice of public hearing(s) on a Substantial Amendments to the Annual Action Plan or Consolidated Plan still must be advertised in a newspaper(s) of general circulation. For a Substantial Amendment to any Annual Action Plan or Consolidated Plan, citizens will now have five (5) days to review the Substantial Amendment. During the five-day comment period, citizens may send comments via e-mail to planning@watertown-ny.gov, or via U.S. Mail to 245 Washington Street, Room 305, Watertown, NY 13601.

A Substantial Amendment is now defined as one of the following (proposed changes in *italics*):

1. A substantial change in allocation priorities (any change greater than 25 percent in an individual project budget) or a substantial change in the method of distribution of funds.
2. To carry out an activity *or project*, using funds from any program covered by the Consolidated Plan (including program income), not previously described in the Annual Action Plan.

3. To change the purpose, scope, location, or beneficiaries of an activity by more than 25 percent of the total funds previously authorized.

Due to social distancing and limits on public gatherings, the City will make full copies of any amendments to the Citizen Participation Plan, Annual Action Plan and Consolidated Plan available for review by appointment only at the following locations:

- City of Watertown Clerk's Office, City Hall, 245 Washington St., Watertown, NY 13601
- City of Watertown Planning Department, City Hall, 245 Washington St., Watertown, NY 13601
- Flower Memorial Library, 229 Washington Street, Watertown, NY 13601
- Watertown Housing Authority Offices, 142 Mechanic Street

To schedule an appointment, citizens may email planning@watertown-ny.gov or call (315) 785-7741. The City will also make all proposed amendments available on its website at www.watertown-ny.gov.

Applicability of Expedited Procedures: The expedited procedures described above only apply to the planned use of supplemental Community Development Block Grant (CDBG) coronavirus funding administered to the City of Watertown through the CARES Act during City FY 2020, ending June 30, 2021.