

# **City of Providence, Rhode Island**

Jorge O. Elorza, Mayor

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## **Citizen Participation Plan**

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## Introduction

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The City of Providence receives annual allocations of Community Development Block Grant (CDBG), HOME Investment Partnerships Program (HOME), Housing Opportunities for Persons with AIDS (HOPWA), and Emergency Shelter Grant (ESG) funds from the U.S. Department of Housing and Community Development (HUD). These grant funds are managed and administered by the Department of Planning and Development, Division of Community Development.

The primary purpose of these formula grant programs is to develop viable communities through the provision of decent housing, a suitable living environment and expanding economic opportunities for low- and moderate-income persons. As a recipient of these entitlement program funds, the City of Providence is required to produce the following documents:

- Consolidated Plan – a five-year plan that documents the City’s housing and community development needs, outlines strategies to address those needs, and identifies proposed program accomplishments
- Annual Action Plan – an annual plan that describes specific projects and activities funded with CDBG, HOME, HOPWA, and ESG funds that will be undertaken over the course of the upcoming program year
- Consolidated Annual Performance and Evaluation Report (CAPER) – an annual report that evaluates the use of CDBG, HOME, HOPWA, and ESG funds

This Citizen Participation Plan has been developed to provide residents, community organizations, policymakers, and other interested parties the opportunity to fully engage in a significant advisory role throughout the planning, implementation and evaluation of the CDBG, HOME, HOPWA, and ESG programs , and to review and comment on each of the documents listed above.

Citizen participation in CDBG, HOME, HOPWA, and ESG program activities ranges from conducting needs assessments and strategic planning to project selection, development, implementation and evaluation. The Citizen Participation Plan outlines the City’s responsibility for providing opportunities for active citizen participation. The goals of the Citizen Participation Plan are to:

- Encourage citizen participation by all Providence residents, emphasizing the involvement of low- and moderate-income residents, people living in low- to moderate-income neighborhoods, people with disabilities, communities of color, residents of assisted housing, those living with HIV/AIDS, and current or formerly homeless individuals and families;
- Inform residents of the City’s Consolidated Plan and Annual Action Plan, including funds available from CDBG, HOME, HOPWA, ESG, and other Continuum of Care Homeless Programs and eligible activities under these programs;
- Give all residents an opportunity to identify and respond to priority needs;
- Give all residents an opportunity to identify and respond to priority proposed projects and the use of funds; and
- Give all residents an opportunity to review and comment on program performance.

The City of Providence assures all residents that adhering to the above goals, residents will have the opportunity to learn about and participate in the planning, allocation, and evaluation of the Consolidated Plan, Annual Action Plan, and Consolidated Annual Performance and Evaluation Report. The participation of residents does not restrict the responsibility or authority of the City of Providence, through the Division of Community Development, for the development and execution of the Consolidated Plan and Annual Action Plan.

The City of Providence will be required to adhere to this Citizen Participation Plan, once adopted, as the official mechanism for obtaining citizen input into the Consolidated Plan process and during the administration of the programs covered by this Plan.

## Process for Citizen Participation

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Opportunities for citizen participation in the planning and development of the City's Consolidated Plan, the subsequent Annual Action Plan, and the CAPER will be provided through several levels of community involvement and outreach.

### **Consultation**

Providence will consult with public and private agencies in the categories listed below as part of the development of the Consolidated Plan.

- Public and Private Agencies that provide assisted housing, health services, and social and fair housing services
- Homeless Service Agencies
- Rhode Island Continuum of Care
- State and Local Health and Child Welfare Agencies
- Business and Civic Leaders
- Adjacent Units of Local Government and Metropolitan-Wide Planning Agencies
- Metropolitan Statistical Area (MSA) Consultation for HOPWA (Note: The HOPWA formula allocation for Providence provides funding for HOPWA activities throughout the Providence-New Bedford-Fall River MSA. This area includes all five counties in Rhode Island and Bristol County Massachusetts. Providence will consult with agencies and parties with a particular interest in HOPWA funding throughout this area).
- Providence Housing Authority

### **Information**

To facilitate participation, the City will provide comprehensive information about the Consolidate Plan process and programs. This includes:

- Amount of Assistance – At the beginning of the process for considering applications for funding, there will be information providing the best available estimate of expected funding for each of the Consolidated Plan programs. This information will be updated as the Federal appropriation process results in new information. When HUD notifies Providence of final fund amounts, that information will be shared on the city web site and by other electronic means to relevant interested parties.
- Range of Eligible Activities – The four Consolidated Plan Programs each authorize a specific list of eligible uses. Some of these permitted uses are limited or conditioned based on compliance with program requirements that are often quite complex and technical. To assist interested parties in understanding the eligible uses, the City will have available on an ongoing basis, several HUD publications that can be reviewed at the city offices and will also be accessible

electronically through links on the city web site. The primary resources for information on eligible activities are:

- CDBG – Basically CDBG
- HOME – Building HOME: A HOME Program Primer HOPWA – HOPWA Formula Program Description
- ESG – Emergency Solutions Grant Program Fact Sheet
- Staff in the City’s Division of Community Development will address specific questions on eligible activities during the application workshops (see below) and at other times, to the extent feasible. In addition, the HUD Exchange website provides a number of resources that can be accessed at: <https://www.hudexchange.info/get-assistance>. Residents are encouraged to use this resource to better understand program parameters, eligible activities, and other programmatic questions they may have.
- Estimate of Benefit to Persons of Low- and Moderate-Income – At minimum, 70 percent of the Providence CDBG, HOME, HOPWA and ESG funds will benefit persons of low- to moderate-income in accordance with program rules. In some cases, Providence may use CDBG funds for activities that address the prevention or elimination of slums and blight or meet an urgent community development need that threatens public health or safety, where persons of low- and moderate-income may not be the principal beneficiaries. Persons of low- and moderate-income are defined as those with incomes at or below 80 percent of median income for the Providence area, adjusted for family size. HUD updates and publishes these income limits annually.
- Minimizing Displacement – Providence has adopted and made public its plan for minimizing displacement. The Plan is available for public inspection and may also be viewed on the City web site. More information on the City’s displacement policy is found below in the “Anti-Displacement Policy and Relocation Plan” section.

### **Publication of Proposed Plan**

Providence will publish the proposed Consolidated Plan and Annual Action Plan on its website for public review and comment. Additionally, copies will be made available for review at the City of Providence, Department of Planning and Development, Division of Community Development, 444 Westminster St., Suite 3A, Providence, RI, 02903 between the hours of 8:30am and 4:30pm (or between the hours of 8:30am and 4pm during the month of July), Monday through Friday, excluding holidays. Copies of the Consolidated Plan and Annual Action Plan will also be available at branches of the Providence Community Library and the Providence Public Library.

Notification of its availability for review and timeline for public comment will be disseminated through a number of communication vehicles, including email notification, promotion at community centers, recreation centers, senior centers, community libraries, homeless shelters, Providence Housing Authority, Veterans Administration, and other partner organizations, online social media, and public notice in municipal buildings.

The City is most interested in reaching the maximum number of residents as possible. As the nature and extent of people’s information networks have evolved greatly over the past several years, there is no

obligation or expectation that the City of Providence will publish an advertisement in any specific newspaper. However, to broaden outreach to communities of color, immigrants, and/or refugees, the City may elect to publish notification of the Plan's availability in publications that are primarily read by communities of color, immigrants, and/or refugees, such as Providence en Español, Providence American, and Nuevos Horizontes or other publications to increase awareness of and solicit engagement from historically marginalized populations.

### **Consolidated Plan Public Hearing**

Providence will hold a public hearing on the proposed Consolidated Plan and Annual Action Plan during the 30 day comment period. Notice, time, and location will follow the Public Hearing General Standards outlined in this Citizen Participation Plan (see below).

### **Consolidated Plan Comment Period**

All interested parties will be invited to submit comments on the proposed Consolidated Plan and Annual Action Plan for at least 30 days after its publication.

### **Consideration of Comments**

At the conclusion of the public comment period, the City will prepare a summary of all comments received, those comments accepted, those comments not accepted, and the reasons any comments were not accepted. Consideration of comments will be described in the City's final submission to HUD.

### **Access to Records**

Copies of the Consolidated Plan, Annual Action Plan, CAPER, and Citizen Participation Plan, including any substantial amendments to these documents, will be made available to the public during normal working hours and on the City's website. These records, available for the preceding five years will be located for public review in the Department of Planning and Development, Division of Community Development, 444 Westminster St., Suite 3A, Providence, RI, 02903. These documents will also be made available in a form accessible to persons with disabilities upon request.

# Public Hearing General Standards

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## **Public Notice**

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Notification of the public hearing will be provided at least two (2) weeks prior to the date of the public hearing.

## **Location**

Public hearings will be held in locations that meet ADA accessibility standards and that can be reached via public transportation, particularly from areas where low- and moderate-income persons reside.

## **Time**

Public hearings will be scheduled at times generally convenient for most residents, such as weekday evening hours or weekends.

## **Frequency**

There will be at least two (2) public hearings annually. One (1) will be held in the January-March period as housing and community development needs and priorities are established or updated. A second public hearing will be held in April after the publication of the draft Consolidated Plan and Annual Action Plan. A third public hearing may be held in September when the draft CAPER is available at which the City will seek additional comment on housing and community development performance during the previous program year.



### **Needs of non-English Speaking Residents**

A Spanish language interpreter will be available at all public hearings as necessary. Interpreters for other languages can be made available if sufficient notice is given.

### **Other Meetings**

In addition to the public hearings discussed above in reference to the Consolidated Plan and Annual Action Plan, the City will periodically hold workshops, focus groups, and other outreach meetings, as appropriate to discuss community, housing, or other needs throughout the City. Every effort will be made to provide notice of seven (7) days or more to interested parties. Notice will be provided using the methods outlined in the Citizen Participation Plan. The time and location of the meetings will vary based on the target audience and purpose. Meetings seeking input from the general public will be held in the early evening hours to the extent possible.

## Technical Assistance

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The primary method for delivering technical assistance to community based organizations is the annual application workshops hosted by the Division of Community Development to inform parties interested in applying for CDBG, HOME, HOPWA, and ESG funding. In addition, the Division of Community Development will provide technical assistance reference material on the City's website that details reporting and compliance requirements for program partners. Periodically, the City will hold additional workshop sessions to enhance program performance and compliance. On an ongoing basis, Division of Community Development staff will be available, to the extent permitted by their capacity and obligations of other duties, to respond to specific technical questions.

Further information is available at: City of Providence, Department of Planning and Development, Division of Community Development, 444 Westminster Street, Suite 3A, Providence RI 02903, Phone: 401-680-8400

As appropriate, Division of Community Development staff may refer technical inquiries to the Ask a Question feature on the HUD Exchange website: <https://www.hudexchange.info/get-assistance/my-question/>. If necessary, Division of Community Development staff may also seek assistance in responding to technical questions from the staff of the Boston Regional HUD Office and from HUD technical assistance providers, as available.

## Amendments

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Amendments to the Consolidated Plan are required whenever the City: (1) makes a change in its allocation priorities or a change in the method of distribution of funds; (2) carries out an activity, using funds from any program covered by the Consolidated Plan (including program income), not previously described in the action plan; or (3) changes the purpose, scope, location, or beneficiaries of an activity.

Amendments to the City of Providence Consolidated Plan or Annual Action Plan of a substantial size and scope are subject to the citizen participation process and mean any one of the following actions:

- Change in Consolidated Plan Allocation Priorities where a priority changes from High to Low or from Low to High;
- Addition of a new activity or deletion of an approved activity in the Annual Action Plan involving funds of \$150,000 or more;
- Revising the allocation of funds in any of the following ways:
  - CDBG: A change of 33% or \$150,000 (whichever is greater) of an individual activity budget among the categories of housing, public facilities, public services, and economic development.
  - HOME: A change of 33% or \$150,000 (whichever is greater) of an individual activity budget among the categories of rental development or rehabilitation, tenant based rental assistance, homeownership assistance, rehabilitation of owner occupied housing, development of owner occupied housing.
  - HOPWA: A change of 33% or \$100,000 (whichever is greater) of an individual activity budget among the categories of support services, facility based assistance, and the combination of tenant based rental assistance and short-term rent, mortgage and utility assistance.
  - ESG: A change of 33% or \$100,000 (whichever is greater) of an individual activity budget among the categories of emergency shelter, street outreach, homeless prevention, rapid re-housing, supportive services, or Homeless Management Information System (HMIS).
- Substantial change in the purpose, scope, location or beneficiaries of an activity, defined as:
  - Changes of at least 33% of the service area of an activity; or
  - Changes of at least 33% of the expected outputs of an activity; or
  - Changes in the eligible beneficiaries of an activity that add or delete a beneficiary category.

Consideration of a substantial amendment will adhere to the following process:

1. Division of Community Development staff will determine if a substantial amendment is required based on the criteria in this Citizen Participation Plan.
2. City officials will develop a proposed Substantial Amendment for public review and comment.

3. The City will notify the public of the availability of the proposed Substantial Amendment using the above Public Notice protocols.
4. Division of Community Development staff will contact organizations directly affected by the Substantial Amendment to provide copies of the proposed Substantial Amendment and the reasons for it.
5. The City will approve a proposed Substantial Amendment following the same process as the Consolidated Plan, providing for a 30-day comment period.

#### **Approval of Other Amendments**

When it is deemed necessary to make Other Amendments to the Consolidated Plan or Annual Action Plan (changes other than those described as substantial above), Providence will consult with affected parties prior to taking action. Final approval of these Other Amendments will be made using departmental discretion among staff and management in the Department of Planning and Development and Division of Community Development. No further action will be necessary.

## **Consolidated Annual Performance and Evaluation Report**

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Citizen participation and comment on the Consolidated Annual Performance and Evaluation Report (CAPER) will general occur during the month of September each year, prior to submission of the CAPER to HUD on or before September 30. Specific actions for review and comment on the CAPER will include:

- The draft CAPER will be made available for review electronically and in hard copy at the Department of Planning and Development, Division of Community Development, 444 Westminster Street, Suite 3A, Providence RI 02903 during normal business hours.
- The City will provide notice following the Public Notice process outlined above.
- The public comment period for the draft CAPER will be 15 calendar days from notification of availability.

# Anti-Displacement Policy and Relocation Plan

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## Permanent Relocation

It is the policy of the City of Providence Community Development Block Grant (CDBG) and HOME Investment Partnerships (HOME) programs to take all reasonable steps to minimize displacement as a result of CDBG- and HOME-assisted projects, including:

- Considering whether displacement will occur during feasibility determinations
- Identifying potential relocation workload and resources early
- Assuring, whenever possible, that residential occupants of buildings rehabilitated are offered an opportunity to return
- Planning rehabilitation projects to include “staging” where this would eliminate temporary displacement
- Following notification procedures carefully so that families do not leave because they are not informed about planned projects or their rights

When a project does require relocation, in order to facilitate the timely issuance of information notices to displaced households, etc., staff of the City of Providence Division of Community Development will ensure that all notices are sent in compliance with the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (URA).

## Temporary Relocation

Temporary relocation often occurs as the result of lead abatement and other rehabilitation activities in renter- and owner-occupied units. Although the City of Providence, Division of Community Development is not required to, in most cases, it requires payment by the developer of the temporary relocation of displaced renters and/or homeowners whose residences are being rehabilitated.

## Environmental Review Process

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**Exempt Activities:** The City of Providence is not required to undertake any environmental review, consultation, or other action under the National Environmental Policy Act of 1969 (NEPA) and the other provisions of law or authorities cited in §58.5 for the activities exempt by this section or projects consisting solely of the following exempt activities:

1. Environmental and other studies, resource identification and the development of plans and strategies;
2. Information and financial services;
3. Administrative and management activities;
4. Public services that will not have a physical impact or result in any physical changes, including but not limited to services concerned with employment, crime prevention, child care, health, drug abuse, education, counseling, energy conservation and welfare or recreational needs;
5. Inspections and testing of properties for hazards or defects;
6. Purchase of insurance;
7. Purchase of tools;
8. Engineering or design costs;
9. Technical assistance and training;
10. Assistance for temporary or permanent improvements that do not alter environmental conditions and are limited to protection, repair, or restoration activities necessary only to control or arrest the effects from disasters or imminent threats to public safety including those resulting from physical deterioration;
11. Payment of principal and interest on loans made or obligations guaranteed by HUD;
12. Any of the categorical exclusions listed in §58.35(a) provided that there are no circumstances which require compliance with any other Federal laws and authorities cited in §58.5.

The City of Providence does not have to submit a request for release of funds or any certification, and no further approval from HUD or the State will be needed by the City for the drawdown of funds to carry out exempt activities and projects. However, the City will document in writing its determination that each activity or project is exempt and meets the conditions specified for such exemption under this section. These written determinations will be made available upon request in writing to the Division of Community Development.

**Categorically Excluded:** Categorical exclusion refers to activities for which no environmental impact statement or environmental assessment and finding of no significant impact under NEPA is required, except in extraordinary circumstances (see 24 CFR §58.2(a)(3)) in which a normally excluded activity may have a significant impact. Compliance with the other applicable Federal environmental laws and authorities listed in §58.5 is required for any categorical exclusion listed below.

*Categorical exclusions not subject to §58.5.* The following categorically excluded activities would not alter any conditions that would require a review or compliance determination under the Federal laws

and authorities cited in §58.5. When the following kinds of activities are undertaken, the City of Providence does not have to publish a NOI/RROF or execute a certification and does not have to submit a RROF to HUD (or the State) except if the City determines that an activity or project may have a significant environmental effect due to extraordinary circumstances and conditions at or affecting the location of the activity or project.

1. Tenant-based rental assistance;
2. Supportive services including, but not limited to, health care, housing services, permanent housing placement, day care, nutritional services, short-term payments for rent/mortgage/utility costs, and assistance in gaining access to local, State, and Federal government benefits and services;
3. Operating costs including maintenance, security, operation, utilities, furnishings, equipment, supplies, staff training and recruitment and other incidental costs;
4. Economic development activities, including but not limited to, equipment purchase, inventory financing, interest subsidy, operating expenses and similar costs not associated with construction or expansion of existing operations;
5. Activities to assist homebuyers to purchase existing dwelling units or dwelling units under construction, including closing costs and down payment assistance, interest buydowns, and similar activities that result in the transfer of title.
6. Affordable housing pre-development costs including legal, consulting, developer and other costs related to obtaining site options, project financing, administrative costs and fees for loan commitments, zoning approvals, and other related activities which do not have a physical impact.
7. Approval of supplemental assistance (including insurance or guarantee) to a project previously approved under this part, if the approval is made by the same responsible entity that conducted the environmental review on the original project and re-evaluation of the environmental findings is not required under §58.47.

*Categorical exclusions subject to §58.5.* The following activities are categorically excluded under NEPA, but may be subject to review under authorities listed in §58.5:

1. Acquisition, repair, improvement, reconstruction, or rehabilitation of public facilities and improvements (other than buildings) when the facilities and improvements are in place and will be retained in the same use without change in size or capacity of more than 20 percent (e.g., replacement of water or sewer lines, reconstruction of curbs and sidewalks, repaving of streets).
2. Special projects directed to the removal of material and architectural barriers that restrict the mobility of and accessibility to elderly and handicapped persons.
3. Rehabilitation of buildings and improvements when the following conditions are met:
  - (1) In the case of a building for residential use (with one to four units), the density is not increased beyond four units, and the land use is not changed;
  - (2) In the case of multifamily residential buildings:
    - i. Unit density is not changed more than 20 percent;
    - ii. The project does not involve changes in land use from residential to non-residential; and
    - iii. The estimated cost of rehabilitation is less than 75 percent of the total estimated cost of replacement after rehabilitation.



- (3) In the case of non-residential structures, including commercial, industrial, and public buildings:
    - i. The facilities and improvements are in place and will not be changed in size or capacity by more than 20 percent; and
    - ii. The activity does not involve a change in land use, such as from non-residential to residential, commercial to industrial, or from one industrial use to another.
4.
  - (1) An individual action on up to four dwelling units where there is a maximum of four units on any one site. The units can be four one-unit buildings or one four-unit building or any combination in between; or
  - (2) An individual action on a project of five or more housing units developed on scattered sites when the sites are more than 2,000 feet apart and there are not more than four housing units on any one site.
  - (3) Paragraphs (a)(4)(1) and (2) do not apply to rehabilitation of a building for residential use (with one to four units).
5. Acquisition (including leasing) or disposition of, or equity loans on an existing structure, or acquisition (including leasing) of vacant land provided that the structure or land acquired, financed, or disposed of will be retained for the same use.
6. Combinations of the above activities.

#### **Dissemination and/or Publication of the Findings of No Significant Impact**

If the City of Providence makes a finding of no significant impact, it will prepare a Notice of Finding of No Significant Impact (FONSI). This FONSI notice will be disseminated through a number of communication vehicles to individuals and groups known to be interested in the activities, to the local news media, to any appropriate tribal, local, State and Federal agencies, to the Regional Office(s) of the Environmental Protection Agency having jurisdiction, and to the HUD Field Office (or the State where applicable). There is no expectation that the City of Providence will publish the FONSI notice in any newspaper of general circulation in the affected community. However, if the notice is not published, it will be prominently displayed in City Hall and other municipal buildings, local community libraries and community centers located near the project area, and will be published on the City's Public Notices website:

<http://providenceri.iqm2.com/Citizens/LegalNotice.aspx>.

The City of Providence may disseminate or publish a FONSI notice at the same time it disseminates or publishes the Notice of Intent to Request Release of Funds (NOI-RROF) as required by 24 CFR §58.70. If the notices are released as a combined notice, the combined notice shall:

1. Clearly indicate that it is intended to meet two separate procedural requirements; and
2. Advise the public to specify in their comments which "notice" their comments address.

The City of Providence will consider any comments received during the below public comment period and make modifications, if appropriate, in response to the comments, before it completes its environmental certification and before it submits its RROF.

**Public Comment Period**

Required notices must afford the public the following minimum comment periods, counted in calendar days:

Notice of Finding of No Significant Impact	15 days when published or, if no publication, 18 days when mailing and posting
Notice of Intent to Request Release of Funds	7 days when published or, if no publication, 10 days when mailing and posting
Concurrent or combined notices	15 days when published or, if no publication, 18 days when mailing and posting

Comments related to environmental reviews must be submitted via email to [amscofield@providenceri.com](mailto:amscofield@providenceri.com) or by mail to Ann Marie Scofield, Department of Planning and Development, City of Providence, 444 Westminster St., Suite 3A, Providence, RI 02903.

## **Additional Strategies for Encouraging Citizen Participation**

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As noted in this Citizen Participation Plan, the City of Providence will make extensive use of its web site, organizational partners, and the resources available on the HUD Exchange website to facilitate the free flow of information on the City's housing and community development needs, plans, and programs.

Within the capacity of available City staff, the Division of Community Development will provide information to the public on an ongoing basis. We also conduct detailed workshop sessions each year to assist entities seeking to apply for housing and community development funds.

Periodically, Providence will convene focus groups of interested citizens and organizations to encourage the free flow of information, ideas, and recommendations on priorities, strategies, and program implementation.

The Division of Community Development will collect and maintain a list of organizations and individuals that will receive all notices for the Consolidated Plan, Annual Action Plan, CAPER, and Citizen Participation and Consultation processes. Persons and organizations will be added to the list by completing a brief form including, name, organization, electronic contact (email), and mailing address.

## General Policy on Response to Written Comments

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Comments on the Consolidated Plan, Annual Action Plan, or Substantial Amendment of the Consolidated Plan or Annual Action Plan must be submitted via email to [bhull@providenceri.com](mailto:bhull@providenceri.com) or by mail to City of Providence, Department of Planning and Development, Division of Community Development, 444 Westminster St., Suite 3A, Providence, RI 02903.

Specific deadlines for submission of comments will be detailed as part of the citizen participation process for the Consolidated Plan, Annual Action Plan, or Substantial Amendment of the Consolidated Plan or Annual Action Plan.

Whenever the City of Providence receives a written comment in the process of approving a Consolidated Plan, Annual Action Plan, or Substantial Amendment of the Consolidated Plan or Annual Action Plan, the City will provide a written response to the comment. City records available for public inspection during City business hours will include all comments received and the response to each comment.

A written complaint may be submitted either electronically or by mail. Any complaint made verbally must be confirmed in writing. The City will contact the submitter when additional information or clarification is needed to respond appropriately to written complaint.

The Division of Community Development will respond in writing within 15 days to any written comments, questions, or complaints received regarding the Consolidated Plan, Annual Action Plan, CAPER or the City of Providence's Housing and Community Development programs in general.