



**City of White Plains, New York**

**Citizen Participation Plan**

**For U.S. Department of Housing and Urban Development**

**Community Development Block Group Federal Funding**

**2014**

City of White Plains  
Department of Planning, Community Development Office  
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## TABLE OF CONTENTS

Citizen Participation Plan Overview	3
Citizen Participation Plan	3
Public Comment & Review Process	4
Public Hearings	4
Community Development Citizens Advisory Committee	5
Consolidated Plan / Annual Action Plan	5
Consolidated Annual Performance & Evaluation Report (Caper)	6
Substantial Amendments	6
Technical Assistance	7
Response to Questions/Complaints	7
Residential Antidisplacement and Relocation Assistance Plan	7

## **CITIZEN PARTICIPATION PLAN OVERVIEW**

The City of White Plains (the “City”) has been a designated Community Development Block Grant (CDBG) Entitlement jurisdiction since 1974. As an entitlement jurisdiction, every five years the City of White Plains is required to prepare and submit a comprehensive Consolidated Plan to the federal Department of Housing and Urban Development (HUD). Each Consolidated Plan contains updated market analyses, an inventory of housing and housing services, as well as a review of available resources to address identified priorities and objectives. In each interim year, the City submits an Action Plan to HUD, which identifies specific resources and activities to be implemented during the following year to achieve the objectives contained in the Consolidated Plan.

The City’s Consolidated Plan represents the means by which the City meets the submission requirements for the Community Development Block Grant (CDBG) as well as other sources of HUD funding that could be available to the City, either directly from HUD or as a subrecipient to another agency. The Consolidated Plan is required to include and result from an effective citizen participation process. Currently, in 2014, the City is preparing the next five-year Consolidated Plan for the period of 2015-2019, and as such, is presenting this amended Citizen Participation Plan for review and adoption.

## **CITIZEN PARTICIPATION PLAN**

The City of White Plains Planning Department is the department responsible for the administration of the HUD CDBG Program. This document shall establish a guide for the City of White Plains to coordinate public participation in the planning of CDBG goals and policies; give timely notice of public comment periods; and reasonable access to public hearings, information, and records relating to the grantee's proposed and actual use of CDBG funds. This Citizen Participation Plan outlines specific steps the City will take to assure for public comment; public hearings and the public availability of HUD required reports such as the Five-Year Consolidated Plan (the Con Plan); the Annual Action Plan; the Consolidated Annual Performance Evaluation Report (CAPER); program performance reviews; and any substantial amendments to the aforementioned.

For further information on the aforementioned CDBG documentation, please visit the Community Development Office, in the City of White Plains Department of Planning, 70 Church Street, White Plains, NY, or their website [www.cityofwhiteplains.com](http://www.cityofwhiteplains.com), or by email [planning@whiteplainsny.gov](mailto:planning@whiteplainsny.gov), or by phone (914) 422-1300.

The City’s Citizen Participation Plan seeks to involve all City residents including low and moderate-income persons, persons living in blighted areas, members of minority groups, members of non-English speaking groups, residents of areas where a significant amount of federally- funded activity is proposed or ongoing, the elderly, the disabled, the business community, and civic groups interested in any of the programs funded directly or indirectly by HUD.

In addition to citizen participation, the City of White Plains will consult with other city departments, a variety of organizations and agencies whose programs serve a wide range of individuals including low to moderate-income persons and special needs citizens, and adjacent governmental entities.

The City shall periodically review its Citizen Participation Plan and shall notice any proposed changes to the Citizen Participation Plan with a fifteen (15) day public comment period. The City shall make copies of its amended Citizen Participation Plan available for comment and viewing in the Community Development Office, the White Plains Public Library located at 100 Martine Avenue, the Thomas H. Slater Center located at 2 Fisher Court, and El Centro Hispano located at 346 South Lexington, all in White Plains. The amended Citizen Participation Plan will also be available on the City's website, [www.cityofwhiteplains.com](http://www.cityofwhiteplains.com). Any person with a disability or a non-English speaking individual who needs assistance to review this Citizen Participation Plan should contact the Community Development Office.

Furthermore, the aforementioned records, documents and information related to the CDBG program, and public participation schedule, are available for review throughout the year in the Community Development Office and/or on the City of White Plains website [www.cityofwhiteplains.com](http://www.cityofwhiteplains.com).

#### **PUBLIC COMMENT & REVIEW PROCESS**

To solicit community involvement, the Community Development Office will publish a notice for public comment, a public hearing or a public review prior to its subsequent submittal of reports, substantial amendment or Plan(s) to HUD.

Prior to any public comment period, the Community Development Office will publish said notice in a local newspaper and/or on the City of White Plains website [www.cityofwhiteplains.com](http://www.cityofwhiteplains.com). A public comment period will begin two weeks following the date of publication and the notice will state the time period for which the public can submit written comments. The city will consider all written comments and views of citizens and attach a summary of said comments with its submittal to HUD including those comments not accepted and the reason for rejection. Written comments will be accepted in the City of White Plains Community Development Office, 70 Church Street, White Plains, NY 10601, or through website access, at the City's website, "Contact City Hall" tab.

#### **PUBLIC HEARINGS**

The City will hold public hearings at City Hall or the Community Development Office during the evening as a convenience to the public. Both facilities and locations are physically accessible to disabled persons and convenient to those seeking information or wanting to make comments.

The Community Development Office will conduct at least two (2) public hearings at two different stages of the planning and development of the Consolidated Plan and/or the Annual Action Plan. The first hearing will take place at the onset of the citizen participation and planning stage of the Annual Action Plan. A second hearing will be held to solicit additional comments on the Plan prior to its adoption by the Common Council of the City of White Plains.

The notice of a public hearing will be published at least fourteen (14) days in advance of the scheduled hearing, and shall contain the purpose, the time and location of the hearing, and describe how to request accommodations for persons with disabilities and non-English-speaking persons and with sufficient prior notice will make accommodations for persons with disabilities or non-English speaking persons. Any verbal comments expressed during a public hearing will be reflected in meeting minutes of the hearing as appendices to its Plan to HUD.

### **COMMUNITY DEVELOPMENT CITIZENS ADVISORY COMMITTEE**

To help assure full and active citizen involvement in the Community Development Program, the Mayor will appoint eleven persons to a community-wide Community Development Citizens Advisory Committee (CDCAC), each to serve a one-year term from January 1 to December 31. The Mayor will select one member as Chair of the CDCAC.

The Committee will have three main purposes:

1. To hold public hearings on the development and past performance of the Consolidated Plan and make recommendations for the allocation of CDBG funds.
2. To assist the City in assessing the needs of its neighborhoods and its residents.
3. To reflect on the past performance of CDBG projects and programs and to make suggestions for their improvements.

In making appointments to the Advisory Committee, the Mayor will provide for representation of low- and moderate-income persons, members of minority groups, non-English speaking persons, persons with disabilities and other persons directly affected by the program and geographical representatives from various areas of the City.

### **CONSOLIDATED PLAN / ANNUAL ACTION PLAN**

The Community Development Office will hold at least two (2) public hearings at different stages of the planning and development of the Consolidated Plan and/or Annual Action Plan (“the Plan”). The Community Development Office and the Community Development Citizens Advisory Committee will review all comments, overall priorities, projects, and funding requests.

Planning for a new program year begins with the first public hearing and is designed to encourage low and moderate-income persons, members of minority groups, members of non-English speaking groups, and residents of targeted neighborhoods to express their views and ideas regarding community development and housing needs. The Community Development Citizens Advisory Committee and Community Development Office staff presents the following information:

- Amount of federal funds anticipated to be available for eligible activities;
- The range of activities which may be undertaken with these funds;
- Local and federal requirements and the annual application processes;

- Examples of projects funded during prior program years.

The Community Development Office facilitates a proposal evaluation process to guide a fair and open process for evaluating, prioritizing and selecting activities to receive funding. The following are examples of criteria considered during the proposal evaluation process, although additional factors may also be considered (e.g. Common Council Priorities, unexpected or urgent local needs, etc.):

- Activity eligibility (with regard to HUD funded program requirements)
- Activity meets a CDBG national objective
- Reasonableness of proposed cost
- Subrecipient capacity to carry out the project (including review of past performance, and fiscal/administrative controls and capacity)
- Priority of need to be addressed

The Community Development Office will notice a thirty (30) day public comment period, at which time a copy of the proposed Plan will be available for public review and comment in the Community Development Office, White Plains Library, the Thomas H. Slater Center, and El Centro Hispano. It will also be available on the City's website, [www.cityofwhiteplains.com](http://www.cityofwhiteplains.com). Upon completion of a thirty (30) day comment period, the Community Development Office will submit the proposed Plan, with comments, for approval by the Common Council of the City of White Plains.

### **CONSOLIDATED ANNUAL PERFORMANCE & EVALUATION REPORT (CAPER)**

The City is required to report annually on project accomplishments and the progress that it has made in carrying out the goals outlined in the Consolidated and Annual Action Plans. This report is known as the Consolidated Annual Performance & Evaluation Report (CAPER). The city shall provide a fifteen (15) day comment period in which anyone may comment on the performance report prior to its submission to HUD. The City shall provide notice in a local newspaper and/or on the City of White Plains website. Also, contained in the notice is a general description of the purpose of the report, where copies of the report may be reviewed, how to submit comments on the report and the date by which those comments must be received. The City shall consider all comments expressed either verbally or in writing and received within the public comment period. The City shall append a summary of these comments to the CAPER in its submission to HUD.

### **SUBSTANTIAL AMENDMENTS**

The U.S. Department of Housing and Urban Development requires jurisdictions to define what constitutes a substantial amendment. When a substantial amendment is proposed, HUD further requires certain standards be met, such as comment periods and public hearings. The City defines a substantial amendment to the Consolidated Plan or annual Action Plan as a change in the use of funds from one eligible activity to another that is greater than 20% of the CDBG program funds. Substantial amendments to the Plan must be authorized by the Common Council and submitted to HUD by the Mayor. The public will also be notified by publishing the amendment in the local newspaper fourteen days prior to the start

of a 30-day citizen review and comment period. The City will consider any comments or views of citizens received in writing or orally during the comment period. A summary of these comments or views, and a summary of any comments or views not accepted and the reasons therefore, shall be attached to the substantial amendment of the consolidated plan. The amendment will then be submitted to HUD and made available at the City of White Plains Planning Department, White Plains Public Library, Thomas H. Slater Center, Inc., and El Centro Hispano, Inc. and on the City's website. The Mayor, as the Certifying Official, will submit a letter to HUD authorizing the amendment after the 30-day comment period and will implement the amendment at that time.

## **TECHNICAL ASSISTANCE**

Community Development staff is available to provide information or technical assistance to local groups with an interest in receiving CDBG funds. If a community group, non-profit organization or housing sponsor desires more intensive information, counseling, or technical assistance, the Community Development Office is available for a reasonable amount of time. The City will determine the level and type of assistance to be provided based on the specific needs of the group requesting such assistance.

## **RESPONSE TO QUESTIONS/COMPLAINTS**

In the event that a resident has a question or complaint about the CDBG Program or about a specific project, the matter will be referred to the proper department or individual for a response. The standard time for a response will be fifteen (15) business days or less.

## **RESIDENTIAL ANTIDISPLACEMENT AND RELOCATION ASSISTANCE PLAN**

This Residential Antidisplacement and Relocation Assistance Plan (RARAP) is prepared by the City of White Plains in accordance with the Housing and Community Development Act of 1974 ("the Act"), as amended; and the U.S. Department of Housing and Urban Development (HUD) regulations at 24 CFR 42.325 and is applicable to the City's Entitlement Community Development Block Grant ("CDBG") Program. The purpose of this plan is to insure that persons displaced as a result of CDBG assisted projects receive the benefits they are entitled to as mandated by federal laws. The Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended ("URA") governs displacement that directly results from acquisition, rehabilitation, or demolition of real property when federal funds are used. The RARAP is in no way intended to supersede the URA. CDBG assisted activities may still be subject to the requirements of the URA.

## **POLICY**

### Policy #1: Minimize Permanent Displacement

The City of White Plains is committed to minimizing the involuntary displacement of residents or businesses as a result of CDBG assisted activities. In addition, CDBG regulations regarding the demolition or conversion of lower-income dwelling units are designed to ensure that lower-income persons are provided with adequate, affordable replacement housing. Consistent with the goals and objectives of activities

assisted under the Act, the City of White Plains will take the following steps to minimize the involuntary displacement of lower-income persons when CDBG funds are involved:

1. Consider all practical alternatives to any proposed project that may result in residential displacement. Alternatives to be considered include other sites for the proposed facilities/project.
2. Stage rehabilitation of apartment units to allow tenants to remain in the building/complex during and after the rehabilitation, working with empty units first.
3. Arrange for facilities to house persons who must be relocated temporarily during rehabilitation.
4. Provide counseling and referral services to assist displacement and find alternative housing in the community.
5. Coordinate code enforcement with rehabilitation and housing assistance programs to minimize disruption due to dilapidating and condemning conditions.

Policy #2: Provide Relocation Assistance to Displaced Persons

The City of White Plains will provide relocation assistance for lower-income tenants who, in connection with an activity assisted under the CDBG Program, move permanently or move personal property from real property as a direct result of the demolition of any dwelling unit or the conversion of a lower-income dwelling unit in accordance with the requirements of 24 CFR 42.350. A displaced person who is not a lower-income tenant, will be provided relocation assistance in accordance with the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended, and implementing regulations at 49 CFR Part 24.

Policy #3: Provide One-for-One Replacement of Lower-Income Dwelling Units

The City of White Plains will provide for the one-to-one replacement of all occupied and vacant occupiable lower-income dwelling units demolished or converted to a use other than lower-income housing in connection with a project assisted with funds provided under the CDBG Program in accordance with 24 CFR 42.375.

Before entering into a contract committing the City of White Plains to provide funds for a project that will directly result in demolition or conversion of lower-income dwelling units, the City of White Plains will make public by publication in a newspaper of general circulation (i.e., The Journal News, the official newspaper of the City of White Plains), and also by placing on the homepage of the website of the City of White Plains and submit to HUD the following in writing:

1. A description of the proposed assisted activity ;
2. The address, number of bedrooms, and location on a map of low and moderate-income dwelling units that will be demolished or converted to a use other than as low and moderate-income dwelling units as a result of the assisted activity;
3. A time schedule for the commencement and completion of the demolition and/or conversion;
4. To the extent known, the address, number of lower-income dwelling units by size (number of bedrooms) and location on a map of the replacement lower-income housing that has been or will be provided.
5. The source of funding and a time schedule for the provision of the replacement dwelling units;
6. The basis for concluding that each replacement dwelling unit will remain a lower-income dwelling unit for at least 10 from the date of initial occupancy; and

7. Information demonstrating that any proposed replacement of lower-income dwelling units with smaller dwelling units (e.g., a 2-bedroom unit with two 1-bedroom units), or any proposed replacement of efficiency or single-room occupancy (SRO) units with units of a different size, is appropriate and consistent with the housing needs and priorities identified in the HUD-approved Consolidated Plan and 24 CFR 42.375(b).

Before obligating or expending CDBG funds that will directly result in such demolition or conversion, the City will make public and submit to HUD the following information in writing:

1. Once identified, the general location on a target area map and approximate number of dwelling units by size (number of bedrooms) that will be provided as replacement units;
2. The City will identify the source of funding at the time of submission and will provide the replacement unit within three years of demolition or conversion.
3. The basis for concluding that each replacement dwelling unit will remain a low/moderate-income dwelling unit for at least 10 years from the date of initial occupancy.

To the extent that the specific location of the replacement dwelling units and other data are not available at the time of the general submission, the City of White Plains will identify the general location of such dwelling units on a map and complete the disclosure and submission requirements as soon as the specific data is available.

#### **Contact for Residential Antidisplacement and Relocation Assistance Plan**

The Commissioner of Planning is responsible for tracking the replacement of lower income dwelling units and ensuring that they are provided within the required period.

The Commissioner of Planning is responsible for providing relocation payments and other relocation assistance to any lower-income person displaced by the demolition of any dwelling unit or the conversion of lower-income dwelling units to another use.

Contact information:

Commissioner of Planning

City of White Plains

70 Church Street

White Plains, NY 10601

914-422-1300

[planning@whiteplainsny.gov](mailto:planning@whiteplainsny.gov)