

**2020-2024 CONSOLIDATED PLAN SUBMISSION**

**ANNUAL ACTION PLAN SUBMISSION**

**Revised**

**Coronavirus Aid, Relief, and Economic Security Act (CARES ACT)**

**with CARES ACT REGULATORY WAIVERS**

**Pawtucket Citizens Participation Guide  
Citizen Participation/Consultation Efforts**

**2020-2024 Strategic Plan Priorities**

**Annual Action Plan Submission**

**CITY OF PAWTUCKET, RHODE ISLAND**

**CITIZENS PARTICIPATION GUIDE**

**for**

**COMMUNITY DEVELOPMENT BLOCK GRANT (CDBG) PROGRAM**

**HOME HOUSING INVESTMENT PARTNERSHIP (HOME) PROGRAM**

**EMERGENCY SOLUTIONS GRANT (ESG) PROGRAM**

**JANUARY, 2020**

**UPDATED MAY 28, 2020**

**Sponsored by:**

City of Pawtucket

Department of Planning and Redevelopment

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## Introduction

The City of Pawtucket receives annual allocations of Community Development Block Grant (CDBG), HOME Investment Partnerships Program (HOME), and Emergency Solutions Grant (ESG) funds from the U.S. Department of Housing and Urban Development (HUD). These grant funds are managed and administered by the Department of Planning and Redevelopment.

The primary purpose of these formula grant programs is to develop viable communities through the provision of decent housing, suitable living environments, and expansion of economic opportunities for low-and moderate-income persons. As a recipient of these entitlement program funds, the City of Pawtucket 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, 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, 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, and ESG programs, as well as the Section 108 Loan Guarantee Program, and to review and comment on each of the documents listed above.

Citizen participation in CDBG, HOME, ESG, and Section 108 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 Pawtucket 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 HUD-assisted housing, 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, ESG, Section 108, 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 Pawtucket assures all residents that by 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 Pawtucket, through the Department of Planning and Redevelopment, for the development and execution of the Consolidated Plan and Annual Action Plan.

Pursuant to the requirements of 24 CFR 91.105 and 24 CFR Part 5.158, the City of Pawtucket hereby issues the following plan to provide for and encourage citizens to participate in the development of the City's Consolidated Plan, any substantial amendments to the Consolidated Plan, development or amendment of the Annual Action Plan(s), and the performance reports. This plan shall amend and supersede the City's existing Citizen Participation Plan, adopted in accordance with Section 104(a)(3) of the Housing and Community Development Act of 1974. The City of Pawtucket will be required to adhere to this Citizen Participation Plan 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

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

Pawtucket will consult with public and private agencies with subject matter expertise in the categories listed below as part of the development of the Consolidated Plan.

- Public and private agencies that provide assisted housing;
- Health services;
- Social services, including those focusing on services to children, elderly person, persons with disabilities, and homeless persons.
- Community-based and regionally-based organizations that represent protected class members, and organizations that enforce fair housing laws.
- Rhode Island Continuum of Care;
- Public and private agencies that address housing, health, social service, victim services, employment, or education needs of:
  - low-income individuals and families,
  - homeless individuals and families, including veterans, youth and persons with special needs.
- Publicly funded institutions and systems of care that may discharge persons into homelessness, such as:
  - health-care facilities
  - mental health facilities
  - foster care and other youth facilities
  - corrections programs and institutions.
- Business and civic leaders;
- State and local health and child welfare agencies, including health department data on the addresses of housing units in which children have been identified as lead-poisoned;
- Adjacent units of local government and regional governmental agencies, particularly agencies with metropolitan-wide planning and transportation responsibilities that go beyond a single jurisdiction;
- Pawtucket Housing Authority;
- Broadband internet service providers, organizations engaged in narrowing the digital divide;
- Agencies whose primary responsibilities include the management of flood prone areas, public land or water resources.
- Emergency management agencies;

## Information

To facilitate participation, the City will provide comprehensive information about the Consolidated 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, including the Section 108 Loan Guarantee Program. This information will be updated as the Federal appropriation process results in new information. When HUD notifies Pawtucket of final fund amounts, that information will be shared on the City website and by other electronic means to relevant interested parties.
- **Range of Eligible Activities** – The three 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 Department of Planning and Development and will also be accessible electronically through links on the City website. The primary resources for information on eligible activities are:
  - *CDBG – Basically CDBG*
  - *HOME – Building HOME: A HOME Program Primer*
  - *ESG – Emergency Solutions Grant Program Fact Sheet*

Staff in the City's Department of Planning and Redevelopment will address specific questions on eligible activities during the application process and during the public meeting on January 15 and at other times, to the extent feasible. If necessary, Department of Planning and Redevelopment 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. 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 Pawtucket CDBG funds must benefit persons of low-to moderate-income in accordance with program rules. In some cases, Pawtucket 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 Pawtucket area, adjusted for family size. HUD updates and publishes these income limits annually.

- **Minimizing Displacement** – Pawtucket has adopted and made public its plan for minimizing displacement. The City’s displacement policy is found below in the “Anti-Displacement Policy and Relocation Plan” section. Additional guidance for grantees and the public on displacement prevention and relocation can also be found in each program’s Manual and Policies & Procedures (available on the City of Pawtucket webpage).

### **Publication of Proposed Plan**

Pawtucket will publish the proposed Consolidated Plan and Annual Action Plan on its website for public review and comment for no less than 30 days. Additionally, copies will be made available for review at the City of Pawtucket, Department of Planning and Redevelopment, 137 Roosevelt Avenue, First Floor, Pawtucket, RI, 02860 between the hours of 8:30am and 4:30pm, Monday through Friday, excluding holidays. Copies of the Consolidated Plan and Annual Action Plan will also be available at the City Clerk’s Office and the Pawtucket Public Library 13 Summer Street, Pawtucket RI 02860.

Notification of its availability for review and timeline for public participation and comment will also be disseminated through a number of discretionary communication vehicles, including email notification, promotion at community centers, recreation centers, senior centers, Pawtucket Housing Authority, 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 Pawtucket 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 America News, and Nuevos Horizontes or other publications to increase awareness of and solicit engagement from historically marginalized populations.

## **Consolidated Plan Public Hearing**

Pawtucket 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).

If virtual hearings are used, real-time responses and accommodation for persons with disabilities and/or with limited English proficiency will be made available to the greatest extent possible. Also, the virtual hearing method will only be used in lieu of in-person hearing if national or local health authorities recommend social distancing and limit public gatherings for public health reasons.

## **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.

For CDBG-CV funding under PY 2019-2020 and the Coronavirus Aid, Relief, and Economic Security Act or CARES Act, and/or any additional funding granted in response to COVID-19 health crises, the city may provide a 5-day notice/comment period of a substantial amendment beginning May 4, 2020 as allowed under a HUD waiver. This includes any new activities proposed. A public hearing is not required but documentation relative to substantial amendment activity planning applies.

## **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 any comments received will be described in the City's final submission to HUD.

## **Access to Critical Records**

Copies of the Consolidated Plan, Annual Action Plan, Regional Analysis of Impediments to Fair Housing, 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 viewing in Pawtucket City Hall, Department of Planning and Redevelopment, 137 Roosevelt Avenue, Pawtucket, RI, 02860. These documents will also be made available in a form accessible to persons with disabilities upon request.

## **Public Hearing General Standards**

### **Public Notice**

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, Library, Pawtucket Housing Authority, 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 Pawtucket 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, America News, and Nuevos Horizontes or other publications to increase awareness of and solicit engagement from historically marginalized populations.

The City will endeavor to provide notification of all public hearings at least two (2) weeks prior to the date of the public hearing.

For CDBG-CV funding under PY 2019-2020 and the Coronavirus Aid, Relief, and Economic Security Act or CARES Act, and/or any additional funding granted in response to COVID-19 health crises, the city may provide a 5-day notice/comment period of a substantial amendment beginning May 4, 2020 as allowed under a HUD waiver. This includes any new activities proposed. A public hearing is not required but documentation relative to substantial amendment activity planning applies.

### **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.

If virtual hearings are used, real-time responses and accommodation for persons with disabilities and/or with limited English proficiency will be made available to the greatest extent possible. Also, the virtual hearing method will only be used in lieu of in-person hearing if national or local health authorities recommend social distancing and limit public gatherings for public health reasons.

### **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 period as housing and community development needs and priorities are established or updated. A second (2<sup>nd</sup>) public hearing will be held after the publication of the draft Consolidated Plan and Annual Action Plan. A third (3<sup>rd</sup>) 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**

The City of Pawtucket operates under an Interim Limited English Proficiency (LEP) Plan, established in accordance with and pursuant to Title VI of the Civil Rights Act of 1964 and Executive Order 13166. A 2018 Four Factor Analysis determined that there are prevalent languages exceeding the HUD "Safe Harbor Threshold" of 5% or 1,000 (whichever is less) of the population of persons to be served or likely to be encountered by the programs covered by this Plan. These languages include Spanish, and Portuguese/Portuguese Creole.

A Spanish language interpreter and an interpreter for other languages will be made available with 48-hour advanced notice. Notice of these reasonable accommodations shall be provided in all public hearing notices. Language assistance services will be provided upon request for the translation of informational flyers, Plan materials, and other comparable public information tools with the goal of informing and encouraging robust citizen participation in the processes outlined herein.

## **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

The primary method for delivering technical assistance to community based organizations is the annual application meeting hosted by the Department of Planning and Redevelopment to inform parties interested in applying for CDBG, HOME, and ESG funding. In addition, the Department of Planning and Redevelopment 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 meetings with individual entities to enhance program performance and compliance. On an ongoing basis, Department of Planning and Redevelopment staff will be available to respond to specific technical questions and assist applicants with the application process.

Further information is available at: City of Pawtucket, Department of Planning and Redevelopment, 137 Roosevelt Avenue, Pawtucket, RI 02860 Phone: 401-728-0500 ext. 430

As appropriate, Department of Planning and Redevelopment staff may refer technical inquiries to the Ask a Question feature on the HUD Exchange website: <https://www.hudexchange.info/get-assistance/myquestion/>. If necessary, Department of Planning and Redevelopment 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

Amendments to the Consolidated Plan or Action 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 Pawtucket 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 an Action Plan 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, or homeownership 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).
  - Section 108: A substantial change in the purpose, scope, location, or beneficiaries of Section 108 funded projects
- 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:

- Department of Planning and Redevelopment staff will determine if a substantial amendment is required based on the criteria in this Citizen Participation Plan.
- City officials will develop a proposed Substantial Amendment for public review and comment.
- The City will notify the public of the availability of the proposed Substantial

Amendment using the above Public Notice protocols.

## CARES Act amendments to the City of Pawtucket's Citizen Participation Plan

### A. Disaster Response Exemption for Substantial Amendment

In the event there is an emergency or disaster, in which a state of emergency has been declared either at the federal, state, or local level, the consultation and citizen participation requirements – public hearing and public comment – related to the adoption of a substantial amendment shall be waived to allow for a timelier response to the emergency or disaster. All other requirements for a substantial amendment shall remain in effect.

On March 27, 2020, President Trump signed the Coronavirus Aid, Relief, and Economic Security Act (CARES Act), Public Law 116-136. Not only does the CARES Act allocate additional FY20 CDBG and ESG dollars to allow municipalities to prevent, prepare for, and respond to the coronavirus (COVID-19), but the CARES Act also adds additional flexibility for the use of PY20 (July 1, 2019 – June 30, 2020) CDBG-CV funds in some cases, for the annual PY21 (July 1, 2020 – June 30, 2021) CDBG funds during these unprecedented times.

Waivers provided by HUD related to the Citizen Participation Plan and Consolidated Plan for the City of Pawtucket were issued on May 4, 2020.

### B. Citizen Participation Public Comment Period for Consolidated Plan and Annual Action Plan Amendments

A HUD CPD grantee may amend an approved consolidated and annual action plan in accordance with 24 CFR 91.505. Substantial amendments to these plans are subject to the citizen participation process in the grantee's citizen participation plan (CPP). The citizen participation plan must provide citizens with 30 days to comment on substantial amendments.

Given the need to expedite actions to respond to COVID-19, HUD has waived this requirement in order to balance the need to respond quickly to the growing spread and effects of COVID-19 with the statutory requirements to provide reasonable notice and opportunity for citizens to comment on substantial amendments concerning the proposed uses of CDBG, HOME, or ESG funds.

Waiver: This 30-day minimum for the required public comment period is waived for substantial amendments, provided that no less than 5 days are provided for public comments on each substantial amendment.

Timeframe: This waiver shall be in effect from May 4, 2020 through the end of the recipient's 2020 program year (June 30, 2021)

### C. Citizen Participation Reasonable Notice and Opportunity to Comment

For substantial amendments to the consolidated and annual action plan, HUD's regulations require the recipient to follow its citizen participation plan (CPP) to provide citizens with reasonable notice and opportunity to comment, and must also state how reasonable notice and opportunity to comment will be given.

Given governmental orders to limit public gatherings, HUD has provided waivers to allow grantees to determine what constitutes reasonable notice and opportunity to comment given their circumstances.

Waiver: This waiver provides that grantees may amend citizen participation plan to establish expedited procedures to draft, propose, or amend consolidated plans. Expedited procedures must include notice and reasonable opportunity to comment of no less than 5 days. The 5-day period can run concurrently for comments on the consolidated plan and annual action plan amendment and amended citizen participation plans.

In-person public hearings are not required. Grantees may meet public hearing requirements with virtual public hearings if:

1. National/local health officials recommend social distancing and limiting public gatherings for public health reasons.
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.

Timeframe: This waiver shall be in effect from May 4, 2020 through the end of the recipient's 2020 program year (June 30, 2021)

Given governmental orders to limit gatherings and the need for expedited decision making related to the use of CDBG-CV funds, the following paragraph describes the efforts to notify the public of public meetings and public hearings during this time:

- Notices for public hearings for amendments to the use of funds proposed in the Consolidated Plan and/or Annual Action Plan will be emailed to neighborhood organizations.
- Notice will be posted on the City website and social media accounts.
- Notice shall be sent to the Planning and Redevelopment Department's email list of agency/organization representatives that operate in Pawtucket.

During this time, public meetings and public hearings shall be conducted virtually to ensure public safety and maintain social distancing. Public hearings will allow for questions in real time, with answers coming directly from officials and planning staff with responses available for all attendees; via a virtual hearing method or platform that provides accessibility for persons with disabilities and/or Limited English Proficiency will be made available to the greatest extent possible.

- Department of Planning and Redevelopment staff will contact any organizations directly affected by the Substantial Amendment to provide copies of the proposed Substantial Amendment and the reasons for it. The City will approve a proposed Substantial Amendment following the same process as the Consolidated Plan, providing for a 30-day comment period.

If virtual hearings are used, real-time responses and accommodation for persons with disabilities and/or with limited English proficiency will be made available to the greatest extent possible. Also, the virtual hearing method will only be used in lieu of in-person hearing if national or local health authorities recommend social distancing and limit public gatherings for public health reasons.

For CDBG-CV funding under PY 2019-2020 and the Coronavirus Aid, Relief, and Economic Security Act or CARES Act, and/or any additional funding granted in response to COVID-19 health crises, the city may provide a 5-day notice/comment period of a substantial amendment beginning May 4, 2020 as allowed under a HUD waiver. This includes any new activities proposed. A public hearing is not required but documentation relative to substantial amendment activity planning applies.

### **CARES ACT/COVID-19 Pandemic**

Any allocation of Community Development Block Grant Funds received by the City of Pawtucket directly tied to or as a result of the enacted CARES Act or the COVID-19 Pandemic will be allocated at the discretion of the Mayor and not trigger an amendment to either the Consolidated Plan or Annual Action Plan.

### **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), Pawtucket 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 Redevelopment. No further action will be necessary.

### **Analysis of Impediments to Fair Housing Choice (“AIFHC”)**

The City of Pawtucket has once again partnered with Rhode Island Housing, the State of Rhode Island’s office of Housing & Community Development & the other RI entitlement communities, to produce a more concise regional Analysis of Impediments to Fair Housing Choice for 2020-2024. Based on the geographic size of Rhode Island, by looking at the issues of Fair Housing on a regional scale, a more thorough and comprehensive analysis of the impediments can take place versus each community performing the same analysis and providing a disjointed approach.

The Regional Analysis of Impediments to Fair Housing Choice (“AIFHC”) is being developed by the State’s Consultant with input from the local communities, through public stakeholder meetings held throughout the State and in the City of Pawtucket.

## **Development of Section 108 Loan Guarantee Assistance Applications**

Applications for assistance filed by the City for Section 108 Loan Guarantee Assistance authorized under HUD regulation 24 CFR Part 570, Subpart M, are subject to all provisions set forth within this Citizen Participation Plan. Such applications for Section 108 Loan Guarantee Assistance may be included as part of the Consolidated Planning process, or may be undertaken separately anytime during the program year. The required public hearing to inform citizens of program requirements will be carried out by the City.

An application for Section 108 Loan Guarantee funding shall be made available for public review for a 30-day period prior to consideration and submission to HUD, and may be carried out concurrently with the public review and comment process for the Five-Year Consolidated Plan. The approved Section 108 Loan Guarantee funding application will be kept on file and online by the City.

Before the City submits an application for Section 108 Loan Guarantee Assistance, it will make available to citizens, public agencies and other interested parties information that includes the amount of assistance the City expects to be made available (including any program income), the range of activities that may be undertaken, the estimated amount that will benefit persons of low- and moderate-income, and any activities likely to result in displacement.

The City will publish its proposed Section 108 Loan Guarantee application on its website for public review and comment for no less than 30 days. Additionally, copies will be made available for review at the City of Pawtucket, Department of Planning and Redevelopment, 137 Roosevelt Avenue, First Floor, Pawtucket, RI, 02860 between the hours of 8:30am and 4:30pm, Monday through Friday, excluding holidays. Copies of the Section 108 Loan Guarantee application will also be available at the City Clerk's Office and the Pawtucket Public Library 13 Summer Street, Pawtucket RI 02860.

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

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 Redevelopment, 137 Roosevelt Avenue, Pawtucket RI 02860 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**

### **Permanent Relocation**

It is the policy of the City of Pawtucket Community Development Block Grant (CDBG), HOME Investment Partnerships (HOME), and Section 108 programs to take all reasonable steps to minimize displacement as a result of CDBG, HOME, and Section 108-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 Pawtucket Department of Planning and Redevelopment 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 Pawtucket, Department of Planning and Redevelopment 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

An environmental review process is required for all HUD-assisted projects to ensure that the proposed project does not negatively impact the surrounding environment and that the property site itself will not have an adverse environmental or health effect on end users. Not every project is subject to a full environmental review (i.e., every project's environmental impact must be examined, but the extent of this examination varies), but every project must be in compliance with the National Environmental Policy Act (NEPA), and other related Federal and state environmental laws. As part of this process, public notification and solicitation of comment may be required. Environmental review records for all funded projects are maintained on file at the Department of Planning and Redevelopment, 137 Roosevelt Avenue, 1<sup>st</sup> Floor, and may be viewed by the public between the hours of 8:30am and 4:30pm.

**Exempt Activities:** The City of Pawtucket 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:

- Environmental and other studies, resource identification and the development of plans and strategies;
- Information and financial services;
- Administrative and management activities;
- 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;
- Inspections and testing of properties for hazards or defects;
- Purchase of insurance;
- Purchase of tools;
- Engineering or design costs;
- Technical assistance and training;
- 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;
- Payment of principal and interest on loans made or obligations guaranteed by HUD;
- 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 Pawtucket does not have to submit a request for release of funds or any certification, and no further approval from HUD 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 Department of Planning and Redevelopment.

**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 Pawtucket does not have to publish a “Notice of Intent to Request a Release of Funds” (NOI/RROF) or execute a certification and does not have to submit a formal “Request for Release of Funds” (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.

- Tenant-based rental assistance;
- 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;
- Operating costs including maintenance, security, operation, utilities, furnishings, equipment, supplies, staff training and recruitment and other incidental costs;
- 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;
- 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.
- 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.
- 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:

- 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).
- Special projects directed to the removal of material and architectural barriers that restrict the mobility of and accessibility to elderly and handicapped persons.
- Rehabilitation of buildings and improvements when the following conditions are met:
  - 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;
  - In the case of multifamily residential buildings:
    - Unit density is not changed more than 20 percent;
    - The project does not involve changes in land use from residential to non-residential; and
    - The estimated cost of rehabilitation is less than 75 percent of the total estimated cost
  - of replacement after rehabilitation.
  - In the case of non-residential structures, including commercial, industrial, and public buildings:
    - The facilities and improvements are in place and will not be changed in size or capacity by more than 20 percent; and
    - 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(i) 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
  - 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.
  - Paragraphs (a)(4)(1) and (2) do not apply to rehabilitation of a building for residential use (with one to four units).
- 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.
- Combinations of the above activities.

*Environmental Assessments:* If a project is not exempt or categorically-excluded, the City must prepare an “environmental assessment” in accordance with NEPA. If a project is determined to have a potentially significant impact on the human environment, an “Environmental Impact Statement” must be prepared.

Projects requiring formal consultation or mitigation under NEPA trigger requirements to publish a Notice of Intent to Request a Release of Funds and obtain “Authority to Use Grant Funds” from HUD.

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

If the City of Pawtucket 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 Pawtucket 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, Library and community centers located near the project area, and may be published on the City’s website or social media.

The City of Pawtucket 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:

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

The City of Pawtucket 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 submits the RROF to HUD.

### **Public Comment Period-Environmental Reviews**

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 or 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 [esoares@pawtucketri.com](mailto:esoares@pawtucketri.com) or by mail to Edward Soares, Community Development Program Manager, City of Pawtucket, Department of Planning and Redevelopment 137 Roosevelt Avenue, Pawtucket, RI 02860.

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

As noted in this Citizen Participation Plan, the City of Pawtucket will make extensive use of its website, social media, 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 staff, the Department of Planning and Redevelopment will provide information to the public on an ongoing basis. We also conduct meetings each year to assist entities seeking to apply for housing and community development funds.

Periodically, Pawtucket 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 Department of Planning and Redevelopment will collect and maintain a digital emailing 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 can be added to the list by contacting [esoares@pawtucketri.com](mailto:esoares@pawtucketri.com) or mailing in their contact information to Edward Soares, Community Development Program Manager, City of Pawtucket, Department of Planning and Redevelopment 137 Roosevelt Avenue, Pawtucket, RI 02860.

## **General Policy on Response to Written Comments**

Comments on the Consolidated Plan, Annual Action Plan, Section 108 Loan Guarantee Application, or Substantial Amendment of the Consolidated Plan, Annual Action Plan, or Section 108 Loan Guarantee Program must be submitted via email to [esoares@pawtucketri.com](mailto:esoares@pawtucketri.com) Edward Soares, Community Development Program Manager, or by mail to City of Pawtucket, Department of Planning and Redevelopment 137 Roosevelt Avenue, Pawtucket, RI 02860.

Specific deadlines for submission of comments will be detailed as part of the citizen participation process for the Consolidated Plan, Annual Action Plan, Section 108 Program, or Substantial Amendment of the Consolidated Plan, Annual Action Plan, or Section 108 Program.

Whenever the City of Pawtucket receives a written comment in the process of approving a Consolidated Plan, Annual Action Plan, Section 108 Loan Guarantee Application or Substantial Amendment of the Consolidated Plan, Annual Action Plan, or Section 108 Loan Guarantee Program, 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 the written complaint.

The Community Development Program Manager will respond in writing within 15 days to any written comments, questions, or complaints received regarding the Consolidated Plan, Annual Action Plan, Section 108 Loan Guarantee Application, CAPER or the City of Pawtucket's housing and community development programs

# City of Pawtucket, Rhode Island

## 2020-2025 CONSOLIDATED PLAN SUBMISSION SCHEDULE

## 2020-2021 ANNUAL ACTION PLAN SUBMISSION SCHEDULE

### FOR

### COMMUNITY DEVELOPMENT BLOCK GRANT

### EMERGENCY SOLUTIONS GRANT

### HOME HOUSING INVESTMENT PARTNERSHIPS

<b>Wednesday, December 18, 2019</b>	General Newspaper Notice/Email Meeting Invitation to non-profits, community groups and City Councilors
Tuesday, December 23, 2019	Prepare presentation, stats review 2018-19 grant year
Friday, December 27, 2019	Review 2020-2025 ConPlan Needs
<b>Wednesday, January 15, 2020</b>	CDBG Public Meeting to Explain Grant Process <ul style="list-style-type: none"><li>• Review Performance 2018-2019 (CAPER)</li><li>• Presentation of 5 year &amp; 1 year Con-Plan Needs/Explanation CDBG/ESG/HOME Programs, Section 108 Loan Guarantee Application</li></ul> <p>Blackstone Valley Visitor Center Theatre, 175 Main Street, Pawtucket, RI – 6:00 p.m.</p>
<b>Thursday, January 16, 2020</b>	General Newspaper Notice/Applications Available/Applications emailed to City Council members
<b>January 17, 2020</b>	On-call meetings with applicants to assist with grant eligibility and preparation
<b>Thursday, February 20, 2020</b>	Applications Due Date 4 P.M.
<b>February 21 – March 2, 2020</b>	Review of all submitted applications for eligibility/status of current CDBG grant if previously funded.
<b>Wednesday, February 21, 2020</b>	Email list of all applications received send to Mayor and City Council in advance of public hearings
<b>Tuesday, March 3, 2020</b>	CDBG Public Service Application Public Hearing Blackstone Valley Visitor Center Theatre, 175 Main Street, Pawtucket, RI - 5 p.m. – 8 p.m.

<b>Wednesday, March 4, 2020</b>	CDBG Activities/HOME Housing Applications / Section 108 Loan Guarantee Application Public Hearing Blackstone Valley Visitor Center Theatre, 175 Main Street, Pawtucket, RI - 5 p.m. – 7 p.m.
<b>March 5 – March 25, 2020</b>	Internal review of all submitted CDBG/HOME/ESG applications against City's Consolidated Plan Priorities, Initial Environmental Reviews.
<b>Thursday, March 26, 2020</b>	Public Presentation on Five Year Con Plan and Section 108 Loan Guarantee Application
<b>March 31 – April 3, 2020</b>	Finalize funding application to HUD
<b>Wednesday, April 22, 2020</b>	Present application to City Council for Resolution authorizing Mayor to Submit Grant Application to HUD
<b>Wednesday, April 22, 2020</b>	City Council Meeting
<b>Monday, April 20, 2020</b>	HUD required newspaper advertisement announcing availability of final application for 30-day required public comment period.
<b>April 8 – May 19, 2020</b>	Input finalized funding plan into HUD prescribed format, complete Environmental Reviews.
<b>Thursday, May 21, 2020</b>	Submit plan officially to HUD for 45-day review period
<b>Monday, July 1, 2020</b>	Anticipated approval date from HUD to begin PY20 Program Year funding.