



**City of Buffalo**  
*Byron W. Brown, Mayor*

**CITIZEN PARTICIPATION PLAN  
FOR THE CONSOLIDATED PLAN  
AND ANNUAL ACTION PLAN**

**June 28, 2018**

## INTRODUCTION

This Citizen Participation Plan serves as a guide for how the City of Buffalo will involve citizens in the process of developing the 5 Year Consolidated Plan and Annual Action Plans. The City of Buffalo is required by HUD to follow a detailed Citizen Participation Plan that describes the City's policies and procedures for involving citizens in the Consolidated Plan and Annual Action Plan process. This Citizen Participation Plan was developed with the input of citizens and will be reviewed, and revised if necessary, every five-seven years as part of the Consolidated Plan process.

HUD requires that this Citizen Participation Plan outline ways in which we will provide for and encourage citizen participation, with an emphasis on low and moderate income people, particularly those who reside in low and moderate income neighborhoods. Furthermore, the U.S. Dept. of Housing and Urban Development (HUD) expects the City to make a considerable effort to encourage the involvement of people of color, people with disabilities, and people who do not speak English.

The City of Buffalo believes that the importance of citizen participation in its programs goes far beyond simply meeting HUD's requirements. It is clear that citizens and community groups serving the needs of citizens are the most familiar with the needs and assets of their community and the strategies that will make their community a more enjoyable place to live and work. Moreover, the quality of services and programs is improved immensely when the lines of communication are open between citizens and local government officials.

## Targeted Groups and Populations for Citizen Participation

The City of Buffalo will encourage the participation of **all citizens** in the Consolidated Plan process. The City has identified the following groups to be particularly targeted for outreach efforts when developing the Citizen Participation Plan, the Five Year Consolidated Plan and the Annual Action Plans. Contact the HUD Grants Program Administrator in the Mayor's Office of Strategic Planning at 851-5449 to be added to the mailing list.

### City of Buffalo

Mayor's Office of Strategic Planning  
Dept. of Community Services  
Dept. of Economic Development,  
Dept. of Permits, Inspections

Dept. of Public Works, Parks & Streets  
Division of Citizen Services  
Buffalo Common Council

### Other Public Organization

Buffalo Urban Renewal Agency (BURA)  
Buffalo Municipal Housing Authority (BMHA)  
Erie County Depts. – Housing, Planning, Senior Services, Social Services  
Niagara County Depts. – Housing and Social Services

### Private Organizations and Non-Profit Agencies and Other Interested Parties

Homeless and Homeless Service Providers  
Persons with HIV / AIDS and HIV / AIDS Services Providers  
Community Development Corporations and Residents Served  
Mental Health and Intellectual Disabilities Agencies / Organizations and Clients  
Alcohol and Drug Dependency Agencies / Organizations and Clients  
Health Department and Lead-Based Paint Agencies / Organizations  
Children and Youth Agencies / Advocacy Groups  
Elderly and Elderly Service Providers  
Persons with Disabilities and Service Providers for Persons with Disabilities  
Economic Development Job Creation Agencies and Community Businesses  
Private Housing Developers/Banks/Fair Housing Groups/CRA Advocacy Groups  
Good Neighbors Planning Alliance  
City of Buffalo Neighborhood Block Clubs  
Rental Assistance Corporation (RAC)  
Buffalo Municipal Housing Authority Tenants

## Notification of Public Hearings & Meetings

The public will be given advance notice of the availability of all Consolidated Plan and Annual Action Plan documents and of public hearings and meetings pertaining to the Consolidated Plan and Annual Action Plan Process. The public will be given at least 2 weeks advance notice of any meeting or hearing. Public Notice will take the following forms, and/or any variation of the following forms:

- Each year, the City will send to everyone on the Mayor's Office of Strategic Planning mailing list a notification of upcoming public hearings and description of the specific activities that will take place in order to carry out the Consolidated Plan and or Annual Action Plan.
- Notices published for Public Hearings on the draft Citizen Participation Plan, the draft Consolidated Plan, the draft Annual Action Plan will include information as to where the draft plans are available for public review as well as the start and end date of the customary 30 day public comment period. Please note there are also exceptions that HUD allows for 14 day public comment periods, these are uncustomary and must be approved by HUD.
- Advertisement in the Local, or Regional Section of the Buffalo News, the City's largest publication.

- Advertisements in neighborhood newspapers, including any variation of ethnic and minority newspapers such as The Challenger, The Criterion, Panorama Hispano, La Ultima Hora, Karibu News, Hispanic Heritage Council of WNY, etc...
- Notice on the City's website, <https://www.buffalony.gov>. The Notice will be posted under the department of the "Office of Strategic Planning" and then under the link for "Consolidated Plan Documents". The information may also be located on the City's homepage by using the "search" box and filling in "Consolidated Plan".
- Notices will be sent to the City's community based organizations and community centers. The Notices will be posted on their bulletin boards.
- Notices will be sent to the Buffalo Municipal Housing Authority and to public housing tenant associations.
- Notice will be sent to any individual or organization requesting to be included in the mailing list. The mailing list will include the City's registered block clubs. Every effort will be made to maintain an up-to-date mailing list. You may be included in the mailing list by emailing your contact information to HUDAdministrator@city-buffalo.com.
- Efforts will be made to include announcements concerning Public Hearings and/or the availability of the Consolidated Plan and Annual Action Plan will also be made on the public government Channel 22.

## **Location & Format of Public Meetings and Hearings**

The location of meetings and hearings are as important as the notification process. If the meetings are held in areas that are not easily accessible to the target population, then citizens will be less likely to participate. The following steps will be taken to ensure that meeting locations are suitable:

- Public meetings and hearings will be held at 6:00 p.m., a time that is convenient to the majority of people who will benefit from the Consolidated Plan Resources.
- Meetings will be held in locations that are not intimidating to citizens who do not often participate in government functions. Possible locations include public libraries, community centers, and schools. Efforts will be made to conduct meetings in low to moderate income areas.
- Non-profit and community groups may be asked to co-sponsor meetings and public hearings so that people see the partnerships that exist between the City and nonprofit organizations.
- All meeting locations will be accessible to people with disabilities. If an individual requires special services, the City of Buffalo will make the necessary arrangements to accommodate that person, as long as advance notice is given. All meeting notices will include contact information for people who require special needs or accommodations. See the following section for technical equipment for the disabled that is available at the Buffalo & Erie County Library.
- All meeting locations will be accessible by bus.
- With five (5) days advance notice, translators will be provided for citizens who do not speak English or who require sign-language translation. Please contact the Mayor's Office of Strategic Planning at 851-4769 or by email to HUDAdministrator@city-buffalo.com.

## Availability of Documents

- The Citizen Participation Plan will be posted year round on the City's website at <https://www.buffalony.gov> under the government department of the "Office of Strategic Planning" and then under the link for "Consolidated Plan Documents". A copy will also be available at all times in the Buffalo & Erie County Public Library, 1 Lafayette Square, for public review. For persons who are legally blind, the library has a Kurzweil Reader that can scan the City's plans and create an audio file. The library also has a Topaz machine that enlarges/magnifies documents for the legally blind or those who have some vision. This equipment is free of charge and available on a first come, first serve basis.
- The City will post the Consolidated Plan documents, the Five Year Consolidated Plan, the Annual Action Plan, and the Consolidated Annual Performance & Evaluation Report (CAPER) on its website at <https://www.buffalony.gov> under the government department of the "Office of Strategic Planning" and then under the link for "Consolidated Plan Documents".
- The City will provide a reasonable number of free copies of the Draft Consolidated Plan and Draft Annual Action Plan in hard copy and/or on computer disk for handout at the Review Public Hearing.
- Citizens may view a copy of the Consolidated Plan, Annual Action Plan, and Consolidated Annual Performance and Evaluation Report (CAPER) in the Mayor's Office of Strategic Planning, 65 Niagara Sq., Room 920 City Hall.
- The City will provide a copy of the draft Consolidated Plan and draft Annual Action Plan to the Buffalo & Erie County Public Library, 1 Lafayette Square. For persons who are legally blind, the library has Kurzweil Reader that can scan the City's plans and create an audio file. The library also has a Topaz machine that enlarges/magnifies documents for the legally blind or those who have some vision. This equipment is free of charge and available on a first come, first serve basis.

## Citizen Participation Opportunities

### ***Stage 1 : Development of the Citizen Participation Plan***

- Every five years, or in concert with updates to the City's Consolidated Plan, the City of Buffalo will evaluate its Citizen Participation Plan and resubmit it as a separate document with the Consolidated Plan.
- The City of Buffalo will conduct a separate Public Hearing for citizens to review the Citizen Participation Plan and any amendments to same.
- The Citizen Participation Plan will be available for general comment for at least 30 days. The City will take into consideration citizen comments in finalizing the Plan.
- The new Citizen Participation Plan will be published as a separate document apart from the Final Consolidated Plan.

### ***Stage 2 – Needs Assessment***

- Consolidated Plan – During the development of the Consolidated Plan, the City will hold community meetings to consult with other public and private agencies that provide assisted housing, health services, and social and fair housing services (including those focusing on services to children, elderly persons, persons with disabilities, persons with HIV/AIDS and their families, homeless persons). The City will consult with adjacent units of general local government, including local government agencies with

metropolitan-wide planning responsibilities, particularly for problems and solutions that go beyond a single jurisdiction. Community organizations will be invited to submit studies, survey results, and needs assessments to use as data for the Consolidated Plan. Other consultations will take place as follows:

- When preparing the portion of the Consolidated Plan describing the City of Buffalo's homeless strategy, the City shall consult with public and private agencies that provide assisted housing, health services, and social services to determine what resources are available to address the needs of any persons that are chronically homeless.
  - When preparing the portion of its Consolidated Plan concerning lead-based paint hazards, the City shall consult with state or local health and child welfare agencies and examine existing data related to lead-based paint hazards and poisonings, including health department data on the addresses of housing units in which children have been identified as lead poisoned.
  - When preparing the description of priority nonhousing community development needs, the City will notify adjacent units of general local government and submit the nonhousing community development plan to Erie County .
  - The City will also consult broadly to develop a metropolitan-wide strategy for addressing the needs of persons with HIV/AIDS and their families living throughout the eligible metropolitan statistical area.
  - The City will consult with the Buffalo Municipal Housing Authority (BMHA) concerning consideration of public housing needs and planned programs and activities.
- Public Hearings are required by law and must take place at each stage of the process. A Formulation Public Hearing will take place at least 30 days before the draft of the Consolidated Plan or Annual Action Plan is completed.
  - Annual Action Plan – Each year, at least 3-6 months before the draft of the Annual Action Plan is completed, a public hearing will be held to assess how needs have changed, gauge community appeals, and to evaluate program performance. Citizens will be encouraged to describe their housing and community development needs. The City will also provide the following information:
    - An estimate of how much funding it expects to receive in the upcoming year for all of the Consolidated Plan Programs;
    - An estimate of the percentage of funds that will serve low and moderate income people;
    - A description of the types of activities that can be funded.
    - The City will set forth its plans to minimize the displacement of persons and to assist any persons displaced, specifying the types and levels of assistance the jurisdiction will make available (or require others to make available) to persons displaced, even if the City expects no displacement to occur.
  - Encourage public input from citizens. All written suggestions are to be sent to the Mayor's Office of Strategic Planning, 65 Niagara Sq., Room 920 City Hall or email to: HUDAdministrator@city-buffalo.com.

### ***Stage 3: Draft of Consolidated Plan or Annual Action Plan***

- At least 45 days before the final Plan is submitted to the U.S. Dept. of Housing & Urban Development, the City will prepare a draft of the Consolidated Plan or Annual Action Plan. The City will conduct a Review Public Hearing to release the draft Consolidated Plan or Annual Action Plan. The City will notify citizens and interested parties of the Public Hearing by following the steps outlined in the "Notification of Public Hearings & Meetings" on page 2.
- At the Review Public Hearing, the City will present a draft outline of its proposed use of funds for review, outline the contracting of programming and services, and engagement of citizen participation. The City will

also provide a reasonable number of free copies of the draft plan summary either in hard copy and/or on computer disk to distribute at the Hearing. Full versions can be viewed online or at the Downtown Public Library.

- The Draft Plan will contain all sections required by HUD, including the Priorities, and an account of all proposed uses of expected funds (type of activity, location, and amount of funding received).
- The Draft Plan will be available to the public on the City's website; <https://www.buffalony.gov>. Under the government tab, Office of Strategic Planning, under the heading of "Consolidated Plan Documents", in the Erie County Public Library, 1 Lafayette Sq., as well as in the Mayor's Office of Strategic Planning, 65 Niagara Sq., Room 920 City Hall, during the hours of 9am-4pm, M-F.
- The City will provide a period of not less than 30 days to receive comments from citizens on the Draft Consolidated Plan or Draft Annual Action Plan. This will give citizens a reasonable amount of time to review and comment on the Draft Plan. Comments may be sent to the Mayor's Office of Strategic Planning, 65 Niagara Sq., Room 920 City Hall, Buffalo, NY 14202 or emailed to: [HUDAdministrator@city-buffalo.com](mailto:HUDAdministrator@city-buffalo.com)
- The City will consider any comments or views expressed by citizens in writing, or orally at public hearings, in preparing the final Consolidated Plan or Annual Action Plan. The City will attach to the final Consolidated Plan or Annual Action Plan, a summary of these comments or views, and a summary of any comments or views not accepted and the reason therefore. The City will respond to any written comments it received within a reasonable time frame, defined as within 15 working days, whenever practicable.

#### **Stage 4: The Final Consolidated Plan or Annual Action Plan**

The Final Consolidated Plan or Annual Action Plan will be available on the City's website; <https://www.buffalony.gov>. Under the government tab, Office of Strategic Planning, under Consolidated Plan Documents. The document will also be available for review in the Mayor's Office of Strategic Planning, 65 Niagara Sq., Room 920 City Hall. A copy will be made available via the Erie County Public Library, 1 Lafayette Sq. In order to be environmentally and fiscally responsible, the city will no longer provide print copies of the final Annual Action Plan, Consolidated Plan, or Consolidated Annual Performance Evaluation Report due to the robust density of said documents. However, a copy of the aforementioned documents will be available for viewing at the city's website (<https://www.buffalony.gov>) and a copy of the summary version of those documents can be provided free of charge, by request only.

#### **Stage 5: Amendments to the Final Consolidated Plan or Annual Action Plan**

- The need may arise during implementation to modify the adopted Consolidated Plan or the Annual Action Plan. The City will amend its plans whenever it makes one of the following decisions: To make a change in its allocation priorities or the method of distributing funds; To carry out an activity using funds from any program covered by the Consolidated Plan (including program income) not previously described in the action plan; or to change the purpose, scope, location and/or beneficiaries of the activity.
- The City will use the following criteria to determine what changes in planned or on-going activities constitute a substantial amendment to the Consolidated Plan or Annual Action Plan: Substantial change is when the cumulative effect of an activity's original budget allocation is increased or decreased by more than twenty-five percent (25%), or when interim financing such as float loans are provided. Substantial change is not rolling over funds from unencumbered project balances from one year to subsequent years for similar activities within the same target area. Nor is it executing transfers within the same HUD- eligible categories.
- The City will conduct a public hearing to provide citizens an opportunity to comment on substantial amendments. The City will notify the public via a newspaper advertisement in the Local, or Regional section of the Buffalo News at least 14 days prior to the date of the hearing. The City will also place an advertisement in minority and ethnic news publications. The notice will include information on where the amendment is available for the public's review. Amendments will be made available for the public's review on the City's website at <https://www.buffalony.gov> and in the Mayor's Office of Strategic Planning, 65 Niagara Sq., Room 920. The notice will also include information on the start and end of the 30 day comment period. Upon commencement of the hearing, citizens will have 30 days to comment on the substantial amendments

- The City will consider any comments or views of citizens received in writing, or orally at public hearings, if any, in preparing the substantial amendment of the Consolidated Plan or Annual Action Plan. The City will attach to the Plan a summary of these comments or views, and a summary of any comments not accepted and the reasons therefore. Written comments will be responded to within a reasonable timeframe, within 15 working days, whenever practicable.

**Stage 6: Amendment to the Citizen Participation Plan**

- Should the need arise to amend the Citizen Participation Plan, the City will conduct a Public Hearing to provide citizens an opportunity to comment on the proposed amendment.
- The City will notify the public of the Hearing via a newspaper advertisement in the Local section of the Buffalo News at least 14 days prior to the date of the hearing. The City will also place an advertisement in minority and ethnic news publications. The notice will include information on where the amendment is available for the public's review. Amendments will be made available for the public's review on the City's website at <https://www.buffalony.gov>, in the Mayor's Office of Strategic Planning, 65 Niagara Sq., Room 920, and at the Buffalo & Erie County Public Library, 1 Lafayette Square. The notice will also include information on the start and end of the 30 day comment period. Upon commencement of the hearing, citizens will have 30 days to comment on the substantial amendments. Comments may be sent to: the Mayor's Office of Strategic Planning, 65 Niagara Sq., Room 920 City Hall or email to: [HUDAdministrator@city-buffalo.com](mailto:HUDAdministrator@city-buffalo.com)

**Stage 7: The Consolidated Annual Performance & Evaluation Report (CAPER)**

- The City's Consolidated Annual Performance & Evaluation Report (CAPER) is due to HUD 90 days after the end of the program year. The CAPER must give a detailed description of how Consolidated Plan funds were used in a given year and to what extent they benefited low and moderate income people.
- The City will notify the public with a newspaper ad in the local daily newspaper with the greatest distribution not less than two weeks prior to submission of the performance report review period, and commence the comment period upon initiation of publication efforts.
- A comment period of not less than 15 days will be provided for citizens to comment on the report.
- The City will also make the CAPER available on the Office of Strategic Planning's website under the heading of Consolidated Plan Documents. The City will also make a copy available for public viewing in the Mayor's Office of Strategic Planning, Room 920 City Hall, 65 Niagara Sq., Buffalo, NY.
- The City will consider any comments or views of citizens received in writing, or orally at public hearings, if any, in reviewing its performance, conducting its programs, and in consideration of the preparation of its next Consolidated Plan. The City will attach to the CAPER a summary of these comments or views, and a summary of any comments not accepted and the reasons therefore. Written comments will be responded to within a reasonable timeframe, within 15 working days, where practicable.

**Technical Assistance**

The City will provide technical assistance to groups representative of persons of low- and moderate-income that request such assistance in developing proposals for funding assistance under any of the programs covered by the consolidated plan, at an appropriate level and type.



This assistance may not include the provision of funds to groups representative of persons of low- and moderate-income that request such assistance in developing proposals for funding assistance under any of the programs covered by the consolidated plan.

### **Responses to Written Complaints and Concerns**

The City will respond to all written complaints concerning the Consolidated Plan, Annual Action Plan, Amendments, and the Consolidated Annual Performance & Evaluation Report sent to the Mayor's Office of Strategic Planning in a timely and substantive manner (within 15 working days, whenever practicable). Responses will be issued either directly from the Mayor's Office of Strategic Planning, or by the relevant party/City department to whom the complaint is forwarded by the Mayor's Office of Strategic Planning.

### **Use of Citizen Participation Plan**

The City will follow both the letter and intent of its citizen participation plan.

### **City Responsibility & Public Access to Records**

The requirements for citizen participation do not restrict the responsibility or authority of the City for the development and execution of its Consolidated Plan. Pursuant to the Freedom of Information Act (FOIA) the City will provide the public with reasonable and timely access to information and records relating to the data or content of the Consolidated Plan or Annual Action Plan. FOIA requests must be made in writing to the Legal Counsel for the City of Buffalo Urban Renewal Agency. The following reports are available on the City's website: the Consolidated Plan, the Annual Action Plan, the Consolidated Annual Performance & Evaluation Report which includes the Grantee Performance Report, and various other reports from the Integrated Disbursement Information System (IDIS).