

COVID-19 Pandemic
4th Amendment to the
CITIZEN PARTICIPATION PLAN (CPP)
CITY OF ITHACA
ITHACA URBAN RENEWAL AGENCY¹

Three important documents are described in this plan and for clarity, they will be identified here:

The Citizen Participation Plan describes the City of Ithaca's procedures for involving the public in development and implementation of the Consolidated Plan and the annual Action Plan. This Plan also stipulates public notice of important communications between the City of Ithaca and the U.S. Department of Housing and Urban Development.

The Consolidated Plan identifies top priority community development needs for a five-year period and has a distinct set of requirements for its development. It describes the general over-arching community development needs of the City and describes strategies for addressing these needs.

The annual Action Plan contains a description and budget for individual activities to be undertaken in each program year with funding made available through the U.S. Department of Housing & Urban Development ("HUD"). The activities of the Action Plan will address the needs identified in the Consolidated Plan and must also meet the selection criteria listed below.

The Assessment of Fair Housing (AFH) is an analysis of fair housing issues in the City of Ithaca and surrounding region is designed to lead to meaningful actions to overcome historic patterns of segregation, promote fair housing choice, and foster inclusive communities that are free from discrimination. The AFH is undertaken in preparation for the Consolidated Plan.

The provisions included in this Citizen Participation Plan are intended to inform the citizens of Ithaca about funding programs available to address community development needs and their regulatory requirements, and identify opportunities to recommend program activities, express views, and comment on the City's proposed activities to be undertaken. In addition, citizens will be given a reasonable opportunity to comment on the City's past performance implementing program activities and any substantial amendments to the Citizen Participation Plan or the Consolidated Plan.

¹ Originally adopted by the IURA/CDA, March 22, 1983
amended, November 12, 1998
amended, March 8, 2000
comprehensive revisions adopted, February 4, 2004
fair housing revisions adopted 6-9-17
amended, April 23, 2020
amended, July 21, 2021

The Common Council shall have ultimate responsibility and authority for the development and execution of its Consolidated Plan. Common Council has selected the Ithaca Urban Renewal Agency (IURA) as the lead agency with primary responsibility for development and administration of the Consolidated Plan, including the implementation of the activities funded through HUD's Entitlement program.

This Citizen Participation Plan shall become effective immediately upon adoption and shall remain in effect until all activities assisted by HUD funds pursuant to the Consolidated Plan are completed, or until it is superseded by a new or revised plan.

The plan shall provide a process for citizen participation at the community-wide level, at the neighborhood level, and in other areas where multi-component projects are proposed or ongoing. This plan is designed to especially encourage participation by residents of predominantly low and moderate-income neighborhoods and any residents of slum or blighted areas.

IURA Responsibilities

The IURA will be responsible for:

1. Overseeing the development and implementation of the five-year Consolidated Plan, including the following four components:
 - A housing and homeless needs assessment;
 - A housing market analysis;
 - A strategic plan, including identification of non-housing community development needs;
 - An annual one-year Action Plan containing a description and budget for activities to be undertaken in the current program year;
2. Amendments to the Consolidated Plan;
3. Development and implementation of the Citizen Participation Plan;
4. Administration of the Consolidated Plan, including preparation of an annual performance report; and
5. Assessment of Fair housing.

I. CONSOLIDATED PLAN

A. Organization Meetings

At the beginning of the cycle to develop or substantially amend the Consolidated Plan, the IURA will hold an organizational meeting describing the goals, regulatory requirements and process to be used in developing the Consolidated Plan. During this time, efforts will be made to solicit informal program suggestions from the general public through various media.

B. Neighborhood Public Input

IURA staff will hold a minimum of four (4) public input meetings at different neighborhood locations. These meetings will acquaint residents with the provisions of the program and obtain citizens' views on community development needs and proposals to effectively address these needs. These meetings will present information to citizens on:

1. the total amount of CDBG funds, and other funds, anticipated to become available to the City on an annual basis;
2. eligible and ineligible activities and mandatory national objectives that each activity must meet;
3. process to be followed to develop the Consolidated Plan, including schedule of meetings and hearings;
4. the citizen participation plan;
5. a summary of other important program requirements, and;
6. presentation of the activities funded in previous years.

Public input meetings will be held at locations convenient to residents of predominantly low- and moderate-income neighborhoods. Meetings will generally take place in the evenings or on weekends. All meetings will be held in buildings that are accessible for persons with disabilities. Notice of these meeting will be published as display ads in *The Ithaca Journal* at least six (6) days prior to any meeting notifying the public of the date, time, location, purpose of the meeting and will include language regarding the availability of accommodations for persons needing special assistance to participate in the meetings.

In addition, notice of the public input meetings will be mailed or e-mailed to a distribution list developed and maintained by the IURA that includes neighborhood organizations, past beneficiary organizations, interested persons and elected officials. The IURA will expand the list to include any individual or organization upon request and will post notices of the meetings in public places as appropriate

Development of the Consolidated Plan shall also be informed by the community development needs and recommendations to address those needs identified in recently completed neighborhood plans or available from an ongoing participatory neighborhood-based planning process.

C. Public Hearings

A minimum of two public hearings will be held to obtain citizens' views and to respond to proposals and questions. One hearing will be held during development of the Consolidated Plan. This first public hearing will be held by the IURA to obtain the views of citizens on the highest priority housing and non-housing community development needs, suggested activities to address these needs, and proposed strategies and actions for affirmatively furthering fair housing. The second public hearing will be held by the Common Council or a Committee of the Common Council after publication of the proposed Consolidated Plan to allow citizens to comment and suggest modifications prior to its adoption. All public hearings will be held in buildings that are accessible for persons with disabilities.

Notice of these public hearings will be published as legal notices in the *Ithaca Journal* at least ten (10) days prior to the public hearing. Notices will include the date, time, location, purpose of the hearing and will contain language regarding the availability of accommodations for persons needing special assistance to participate in the meetings. In addition, the IURA will request that announcements regarding the public hearings be made at a meeting of the following groups prior to the hearing:

- City of Ithaca Common Council;
- Appropriate City of Ithaca Common Council committee(s);
- City of Ithaca Board of Public Works;
- City of Ithaca Planning & Development Board;
- Ithaca Urban Renewal Agency;
- Housing & Homeless Housing Task Force;
- other venues as appropriate.

Effective April 2, 2020, consistent with the Mega-waiver issued by HUD on March 31, 2020, and for the duration of the Mega-waiver and/or other HUD-issued waivers and policies for the following programs:

- CDBG-CV grant
- HOME American Rescue Plan grant
- FY19 and FY20 CDBG grants
- FY19 and FY20 HOME grants
- any other applicable allocation,

This section is modified to require a public comment period of at least five (5) days, to include a virtual public hearing with the opportunity for members of the public to comment in real time. Notice of the public comment period will be posted on a variety of platforms.

D. Consultations with Public and Private Organizations

In addition to neighborhood meetings and public hearings, a minimum of four topical focus group meetings will be convened with public agencies, non-profit organizations, private entities, and interested persons. The topics will include:

- Housing;
- Downtown Revitalization and Economic Development;
- Infrastructure and Public Facilities;
- Public Services.

The focus meetings will be advertised and agencies and interested individuals will be contacted directly to encourage their participation at these meetings. Notice of focus meetings will be mailed or e-mailed to a distribution list of organizations and individuals by focus topic, including organizations that have submitted funding applications in the past. The IURA will expand the list to include any individual or organization upon request.

E. Consultation with the Ithaca Housing Authority

The Ithaca Housing Authority and Housing Authority residents will be encouraged to participate in the development of the Consolidated Plan using two strategies. First, at least one of the neighborhood public input meetings will be held at a location convenient to Housing Authority residents. In addition, the Housing Authority staff, board and resident councils will be contacted directly and encouraged to participate in the housing focus meeting. Finally, a meeting will be held directly with Housing Authority staff to ensure coordination of the Consolidated Plan with the Housing Authority's Comprehensive Grant program and other project planning.

F. Publication of the Proposed Consolidated Plan

The IURA will publish copies of the proposed Consolidated Plan on behalf of the City of Ithaca at least 30 days prior to its submission to HUD. Copies will be made available at the following locations:

- the office of the IURA;
- the City Clerk's Office
- the Tompkins County Public Library
- the Tompkins County Human Service Coalition office;
- other venues as appropriate.

An electronic version of the proposed plan will also be posted on the City of Ithaca web page (www.cityofithaca.org).

G. Publication of the Notice of Availability of the Proposed Consolidated Plan

Legal notice of the availability of the proposed Consolidated Plan, including a brief summary of the document, will be published in the *Ithaca Journal* during the 30-day public comment period. The summary will describe the contents and purpose of the Consolidated Plan and will include a list of the locations where copies of the entire proposed Consolidated Plan may be examined. In addition, the City Clerk will be requested to announce the availability of the proposed Consolidated Plan for public comment at a Common Council meeting during the 30-day public comment period.

Effective April 2, 2020, consistent with the Mega-waiver issued by HUD on March 31, 2020, and for the duration of the Mega-waiver and/or other HUD-issued waivers and policies for the following programs:

- CDBG-CV grant
- HOME American Rescue Plan grant
- FY19 and FY20 CDBG grants
- FY19 and FY20 HOME grants
- any other applicable allocation

This section is modified to provide a minimum 5-day public comment period, to include a virtual public hearing with opportunity for citizens to comment in real time. Notice of the public comment period will be posted on a variety of platforms.

H. Citizen Review of Proposed Consolidated Plan

A minimum thirty (30) day period, from the date of the legal notice of the availability of the proposed Consolidated Plan, will be provided to receive comments from citizens on the Consolidated Plan. All written comments received during this period will be addressed by the staff of the IURA, in writing, no later than 15 days after receipt. A summary of comments received in writing, or orally at the public hearings, and the IURA response to such comments will be attached to the final Consolidated Plan.

Following the second public hearing and close of the 30-day public comment period, the Common Council will vote to adopt a final Consolidated Plan.

Effective April 2, 2020, consistent with the Mega-waiver issued by HUD on March 31, 2020, and for the duration of the Mega-waiver and/or other HUD-issued waivers and policies for the following programs:

- CDBG-CV grant
- HOME American Rescue Plan grant
- FY19 and FY20 CDBG grants
- FY19 and FY20 HOME grants
- any other applicable allocation

This section is modified to provide a minimum 5-day public comment period for the proposed action plan, to include a virtual public hearing with opportunity for citizens to comment in real time.. All written comments received during this period will be addressed by the staff of the IURA, in writing within five (5) days. Notice of the public comment period will be posted on a variety of platforms.

II. ANNUAL ACTION PLAN

A. Organizational Meeting

At the beginning of each annual action plan cycle, the IURA will hold an organization meeting so that staff can explain the program and the relation between the action plan and consolidated plan. During this time, efforts will be made to solicit informal program suggestions from the general public through various media.

B. Neighborhood Public Input

IURA staff will hold a minimum of two (2) neighborhood meetings during development of the annual proposed Action Plan. These informal meetings will acquaint residents with the provisions of the program and obtain citizens' views on community development needs and proposals to effectively address these needs. These meetings will be held in locations convenient to residents of predominantly low- and moderate-income neighborhoods, especially those neighborhoods targeted for revitalization. These meetings will present information to citizens on:

1. the total amount of funds anticipated to become available to the City on an annual basis;
2. eligible and ineligible activities and mandatory national objectives that each activity must meet;
3. process to be followed for development of the proposed Action Plan, including schedule of meetings and hearings;
4. the citizen participation plan and opportunities for input;
5. a summary of other important program requirements; and
6. presentation of the activities funded in previous years.

Meetings will generally take place in the evenings or on weekends. All meetings will be held in buildings that are accessible for persons with disabilities. Notice of these meetings will be published as a display ad in *The Ithaca Journal* at least six (6) days prior to any meeting notifying the public of the date, time, location, purpose of the meeting and will include language regarding the availability of accommodations for persons needing special assistance to participate in the meetings. A summary of the input received will be presented to the Ithaca Urban Renewal Agency and will be used to inform funding decisions.

Effective April 2, 2020, consistent with the intent of the Mega-waiver issued by HUD on March 31, 2020, and for the duration of the Mega-waiver and/or other HUD-issued waivers and policies for the following programs:

- CDBG-CV grant
- HOME American Rescue Plan grant
- FY19 and FY20 CDBG grants
- FY19 and FY20 HOME grants
- any other applicable allocation

This section is waived for plans to address the COVID-19 Pandemic, including but not limited to funds awarded through the Coronavirus Aid Relief and Economic Security Act (CARES) Act, HOME American Rescue Plan (ARP), and other applicable allocations.

C. Public Hearings

A minimum of two public hearings will be held to obtain citizens' views and to respond to proposals and questions. One hearing will be held during development of the Action Plan. This first public hearing will be held by the IURA to obtain the views of citizens on the highest priority housing and non-housing community development needs, suggested activities to address these needs, and proposed strategies and actions for affirmatively furthering fair housing. The second public hearing will be held by the Common Council or a Committee of the Common Council after publication of the proposed Action Plan to allow citizens to comment and suggest modifications prior to its adoption.

All public hearings will be held in buildings that are accessible for persons with disabilities. Notice of these public hearings will be published as legal notices in the *Ithaca Journal* at least ten (10) days prior to the public hearing. Notices will provide the public of the date, time, location, purpose of the hearing and will include language regarding the availability of accommodations for persons needing special assistance to participate in the meetings.

In addition, the IURA will request that announcements regarding the schedule of public hearing be made at a meeting of the following groups prior to the hearing:

- City of Ithaca Common Council;
- Appropriate Common Council Committee(s);
- City of Ithaca Planning & Development Board;
- Ithaca Urban Renewal Agency;
- Housing & Homeless Housing Task Force; and
- other public meetings as appropriate.

Effective April 2, 2020, consistent with the Mega-waiver issued by HUD on March 31, 2020, for the duration of the Mega-waiver and/or other HUD-issued waivers and policies for the following programs:

- CDBG-CV grant
- HOME American Rescue Plan grant
- FY19 and FY20 CDBG grants
- FY19 and FY20 HOME grants
- any other applicable allocation

This section is modified to require a single public hearing with a minimum five (5) day public comment period. Notice of the public hearing and comment period will be posted on a variety of platforms at least two (2) days prior to the public hearing. The public hearing may be conducted virtually pursuant to NYS executive order number 202.15 as amended, updated, or re-issued, or pursuant to legislation enabling virtual public hearings. A virtual public hearing is authorized if:

1. National/local health authorities recommend social distancing and limiting public gatherings for public health reasons;
2. Virtual hearings provide reasonable notification and access for citizens to comment on proposed use of funds, activities to be undertaken, and raise issues; and
3. A record of comments received and responses shall be made available for public review within 5 days following the virtual public hearing.

D. Development of Proposed Action Plan

The IURA will select recommended activities through a limited application process that includes a public solicitation of funding proposals to address community development needs identified in the Consolidated Plan and implement community revitalization and neighborhood stabilization goals. The IURA will review the initial funding applications and narrow the number of applications under final consideration based on the projected amount of available funding for the upcoming program year and selection criteria, including, but not limited to the following:

- Eligibility;
- Need;
- Impact;
- Feasibility;
- Capacity of the sponsor organization to successfully implement the proposed activity in a timely manner, including past performance of the sponsor organization;
- Leveraging of other funding sources;
- Coordination with other initiatives, plans or other submitted proposed activities.

Sponsors of selected activities will be requested to submit additional detailed information as needed during the selection process. New proposed activities may be considered by the IURA at any time during the process.

Following analysis of the funding applications review of detailed information, the IURA will prepare a proposed Action Plan including the following:

- A description of the activities to be undertaken;
- Budgeted amounts for each activity;
- Number and type of persons and families that will benefit;
- Priority needs addressed;
- Program income anticipated; and
- Target completion dates.

E. Publication of the Notice of Availability of the Proposed Action Plan

Legal notice of the availability of the proposed Action Plan will be published in the *Ithaca Journal*, and will include a summary of the selected activities to be undertaken and budgeted amounts allocated to each activity as well as a list of the locations where copies of the entire proposed Action Plan may be examined. In addition, the City Clerk will be requested to announce the availability of the proposed Action Plan for public comment at a Common Council meeting during the 30-day public comment period.

Effective April 2, 2020, consistent with the Mega-waiver issued by HUD on March 31, 2020, and for the duration of the Mega-waiver and/or other HUD-issued waivers and policies for the following programs:

- CDBG-CV grant
- HOME American Rescue Plan grant
- FY19 and FY20 CDBG grants
- FY19 and FY20 HOME grants
- any other applicable allocation

This section is modified to provide a minimum 5-day public comment period.

F. Citizen Review of Proposed Action Plan

A minimum thirty (30) day period, from the date of the legal notice of the availability of the proposed Action Plan, will be provided to receive comments from citizens on the proposed Action Plan. All written comments received during this period will be addressed by the staff of the IURA, in writing, within 15 days. A summary of comments received in writing, or orally at the public hearings, and the IURA response to such comments will be attached to the final Action Plan.

Following the second public hearing and close of the 30-day public comment period, the Common Council will vote to adopt a final Action Plan.

Effective April 2, 2020, consistent with the Mega-waiver issued by HUD on March 31, 2020, and for the duration of the Mega-waiver and/or other HUD-issued waivers and policies for the following programs:

- CDBG-CV grant
- HOME American Rescue Plan grant
- FY19 and FY20 CDBG grants
- FY19 and FY20 HOME grants
- any other applicable allocation

This section is modified to provide a minimum 5-day public comment period for the proposed action plan,, to include a virtual public hearing with opportunity for citizens to comment in real time. All written comments received during this period will be addressed by the staff of the IURA, in writing within five (5) days.

G. Joint Development of Action Plan with Consolidated Plan

In program years when the Action Plan is being developed jointly with the Consolidated Plan, the citizen participation process for the Consolidated Plan shall serve to satisfy the Action Plan citizen participation requirements.

III. ASSESSMENT OF FAIR HOUSING (AFH)

The IURA will follow the process and procedures described below in the development of the Assessment of Fair Housing.

A. HUD-approved Data for Public Review

The IURA will make available to the general public the HUD-provided data and other supplemental information that the IURA plans to incorporate into the AFH. The IURA will make this data available no later than 60 days after the initiation of the AFH document.

B. Stakeholder Consultation and Citizen Outreach

In the development of the AFH, the IURA will consult with other public and private agencies including, but not limited to, the following:

- Local public housing authorities;
- Other assisted housing providers;
- Social service providers including those focusing on services to minorities, families with children, the elderly, persons with disabilities, persons with HIV/AIDS and their families, homeless persons, and other protected classes;
- Community-based and regionally-based organizations that represent protected class members and organizations that enforce fair housing laws;
- Regional government agencies involved in metropolitan-wide planning and transportation responsibilities; and,
- A variety of mechanisms may be utilized to solicit input from these entities. These include telephone or personal interviews, mail surveys, internet-based feedback and surveys, focus groups, and/or consultation workshops.

C. Public Hearing

To obtain the views of the general public on AFH-related data and affirmatively furthering fair housing in the City's housing and community development programs, the City will conduct at least one public hearing before the draft AFH is published for comment.

The public hearing will be held in a building that is accessible for persons with disabilities. Notice of the public hearing will be published as legal notices in the *Ithaca Journal* at least ten (10) days prior to the public hearing. Notices will provide the public of the date, time, location, purpose of the hearing and will include language regarding the availability of accommodations for persons needing special assistance to participate in the meetings.

D. Publication and Notice of Availability of Draft Assessment of Fair Housing

Legal notice of the availability of the draft AFH will be published in *The Ithaca Journal* newspaper and the draft AFH shall be made available on the City of Ithaca official government Web site. The public notice shall include the purpose of the AFH, the dates of the public comment period, the locations where copies of the proposed document can be examined, and how to submit comments. In addition, the City will make available a reasonable number of free copies of the proposed document to residents and groups that request them.

E. Comments Received on the Draft Assessment of Fair Housing

A minimum thirty (30) day period, from the date of the legal notice of the availability of the draft AFH, will be provided to receive comments from citizens and interested parties on the proposed AFH. All written comments received during this period will be addressed by the staff of the IURA, in writing, within 15 days. A summary of comments received in writing, or orally at the public hearing, and the IURA response to such comments will be attached to the final AFH.

F. Submission to HUD

The Assessment of Fair Housing will be submitted to HUD 270 days prior to the beginning of the Program Year in which a Consolidated Plan is due, unless HUD grants a waiver for an alternative submission deadline. .

G. Revisions

An AFH previously accepted by HUD must be revised and submitted to HUD for review under the following circumstances:

1. *A material change occurs. A material change is a change in circumstances in the City of Ithaca that affects the information on which the AFH is based to the extent that the analysis, the fair housing contributing factors, or the priorities and goals of AFH no longer reflect actual circumstances. Examples:*
 - *Presidentially declared disasters within the City of Ithaca that significantly impact the steps the City may need to affirmatively further fair housing*
 - *significant demographic changes*
 - *new significant contributing factors within the City; and*
 - *civil rights findings, determinations, settlements (including Voluntary Compliance Agreements) or court orders; or*
2. *Upon HUD's writing notification specifying a material change that requires the revision.*

In the event of a Revised AFH, A revision may not necessarily require the submission of an entirely new AFH. The revision need only focus on the material change and appropriate adjustments to the analyses, assessments, priorities and goals.

- a. *Timeframe for revision*
 - b. *Where revision is required due to a material change, such a revision shall be submitted within 12 months of the onset of the material change, or at such later date as HUD may provide.*
 - c. *Community Participation*
- Revisions to AFH, as described in this section are subject to community participation. The City must follow the notice and comment process applicable to consolidated plan substantial amendments under the City's citizen participation plan.
- d. *Submission to HUD of the revised AFH.*

Upon completion, any revisions to the AFH must be made public and submitted to HUD at the time of the revision.

IV. PROGRAM AMENDMENTS

A. Amendments to the Consolidated Plan

A HUD-approved Consolidated Plan shall be amended whenever a decision is made to:

- To change the purpose, scope, location or beneficiaries of an activity;
- To carry out an activity, using funds from any program covered by the Consolidated Plan not previously described in the Action Plan; or
- Change its allocation priorities or a change in the method of distribution of funds.

B. Substantial Amendments

The following criteria will be used to determine what changes in planned or actual activities constitute a substantial amendment to the Consolidated Plan, that are subject to a citizen participation process. Substantial program amendments will require an amendment to the Consolidated Plan, Common Council approval, and submission to HUD.

- A substantial change in the use of Entitlement Grant funds from one eligible activity to another eligible activity is defined as any change in the allocation of funds for a specific activity that constitutes more than \$25,000 or more than twenty percent (20%) of the total funds available or allocated to that actual activity, whichever amount is greater.
- A substantial change to use funds for an activity not previously described in the Action Plan shall be defined as an activity allocated more than \$25,000 of federal funds.
- A substantial change in the location of an activity is defined as any relocation of an activity outside the Census designated neighborhood it was intended to serve, but not including the expansion of a target area after all qualified beneficiaries within the primary target neighborhood have been reasonably offered to be assisted.
- A substantial change to the method of distribution of funds is defined as any change to the original approved terms of assistance to beneficiaries that results in increased costs to the intended beneficiaries (e.g. changing a matching grant home owner rehabilitation program to repayable loan program), or any change to the original approved recapture terms of federal assistance in the event that beneficiaries do not comply with requirements of receiving assistance (e.g., waive recapture of portion of federal assistance in event landlord does not comply with the requirement to rent apartments to low-income persons at affordable rents for five years) .
- A substantial change to the purpose, scope or beneficiaries of an activity shall be determined by the IURA based on an analysis of the individual characteristics of proposed change to determine whether the change significantly changes the objective, or category of beneficiaries, of the activity.

Amendments that fall below the threshold for a substantial amendment may be approved by the IURA with notice provided to the Common Council.

C. Citizen Review of Proposed Substantial Program Amendments

To assure citizen participation on proposed substantial program amendments, the IURA shall develop and make available to the public at no charge a summary of the proposed substantial program amendment in such manner as to afford affected and interested citizens an opportunity to submit informed comment on the proposal prior to the mandatory public hearing.

A minimum of one (1) public hearing will be held by the Common Council or a Common Council Committee with jurisdiction over the issue to obtain citizens' views on the proposed substantial program amendment. The public hearing will be held in a building that is accessible for persons with disabilities. Notice of these public hearings will be published as legal notices at least seven (7) days prior to the public hearing. The legal notice shall provide the public of the date, time, location, purpose of the hearing and will include language regarding the availability of accommodations for persons needing special assistance to participate in the meetings. Following the public hearing the Common Council may vote to approve the substantial program amendment. HUD shall be notified of all substantial program amendments.

Effective April 2, 2020, consistent with the Mega-waiver issued by HUD on March 31, 2020, and for the duration of the Mega-waiver and/or other HUD-issued waivers and policies for the following programs:

- CDBG-CV grant
- HOME American Rescue Plan grant
- FY19 and FY20 CDBG grants
- FY19 and FY20 HOME grants
- any other applicable allocation

This section is modified to require a public comment period of a minimum of five (5) days, to include a virtual public hearing with opportunity for citizens to comment in real time. Notice of the public comment period will be posted on a variety of platforms at least two (2) days prior to the public hearing. All written comments received during the public comment period will be addressed by the staff of the IURA, in writing, within five (5) days.

IV. CITIZEN COMMENT ON THE CITIZEN PARTICIPATION PLAN AND AMENDMENTS

Citizens will be provided a reasonable opportunity to comment on the original Citizen Participation Plan and on substantial amendments to the plan. The Citizen Participation Plan will be made available to the public and will be made available in a format accessible to persons with disabilities, upon request.

A minimum of one (1) public hearing will be held by the Common Council or a Common Council Committee with jurisdiction over community development issues to obtain citizens' views on the proposed Citizen Participation Plan or any substantial amendments. The public hearing will be held in a building that is accessible for persons with disabilities. Notice of these public hearings will be published as legal notices at least seven (7) days prior to the public hearing. The legal notice shall provide the public of the date, time, location, purpose of the hearing and will include language regarding the availability of accommodations for persons needing special assistance to participate in the meetings.

Following the public hearing, the Common Council may vote to approve the Citizen Participation Plan or amendment.

Effective April 2, 2020, consistent with the Mega-waiver issued by HUD on March 31, 2020, and for the duration of the Mega-waiver and/or other HUD-issued waivers and policies for the following programs:

- CDBG-CV grant
- HOME American Rescue Plan grant
- FY19 and FY20 CDBG grants
- FY19 and FY20 HOME grants
- any other applicable allocation

This section is modified to require a minimum five (5) day public comment period, to include a virtual public hearing, to include opportunity for citizens to comment in real time. Notice of public hearing will be posted on a variety of platforms. .

V. PERFORMANCE REPORTS AND OTHER IMPORTANT COMMUNICATIONS FROM HUD

IURA staff will report periodically at public meetings of the IURA on the implementation of the Consolidated Plan and prepare an annual performance report reviewing the performance of the city in meeting objectives of the Consolidated Plan, HUD goals and applicable regulations. Citizens will be provided with reasonable notice and an opportunity to comment on an annual performance report prepared by the IURA. Notice of the availability of the annual performance report for citizen review will be published in the *Ithaca Journal* including information on where to review the document. In addition, the IURA will request that an announcement of the availability of the performance report be made at a meeting of the Ithaca Common Council.

A minimum fifteen (15) day period, from the date of the legal notice of the availability of the performance report, will be provided to receive comments from citizens on the performance report. The IURA shall consider any comments or views of citizens received in writing, or orally at any public hearing in preparing the performance report. A summary of these comments or views shall be attached to the performance report.

Periodically HUD communicates important information to the City of Ithaca regarding the implementation and oversight of the Entitlement Program. Such communications will be made available for public inspection and the public will be notified of these communications through announcements made at Ithaca Urban Renewal Agency and Common Council meetings.

VI. DISPLACEMENT

The City of Ithaca seeks to minimize the displacement of persons as a result of activities assisted with programs covered by the Consolidated Plan.

For activities assisted with programs covered by the Consolidated Plan that displaces a person or persons, the City of Ithaca will comply with the acquisition and relocation requirements of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended.

VII. MISCELLANEOUS**A. Availability to the Public**

The Consolidated Plan as adopted, substantial amendments, performance reports and other important communications from HUD will be available to the public, including the availability of materials in a form accessible to person with disabilities.

All records, reports, applications and regulations related to the Consolidated Plan will be available to the public for use and review at the office of the IURA, 108 East Green Street, Ithaca, NY 14850, during normal working hours (8:30 a.m. - 4:30 p.m.). The City and the IURA reserve the right to require the public to abide by the process of the public's right of information under the Freedom of Information Act.

B. Access to Records

The IURA and City of Ithaca will provide citizens, public agencies, and other interested parties with reasonable and timely access to information and records relating to the City's Consolidated Plan and the use of assistance under the programs covered by the Consolidated Plan during the preceding five years.

C. Complaints

Complaints regarding the Citizen Participation Plan, Comprehensive Plan, the Action Plan, or amendments or the performance report will be accepted by the IURA office at any time. A citizen who submits a written complaint to the IURA Office will receive a written substantive response as soon as possible and no later than 15 working days upon receipt of the complaint. The response will be handled by the lead IURA staff person assigned to the project and will include an explanation of the Citizen Complaint process and further appeals available to the complainant. Copies of all complaints will be provided to the IURA Executive Director and the Mayor and be filed in a Citizen Complaint file.

If the issue is not satisfactorily resolved, the complainant may appeal to first the Executive Director, then to the appropriate IURA subcommittee, and finally to the full Agency. Written complaints and disposition of these complaints are included in annual performance reports submitted to the funding agency.

The IURA staff will notify the IURA about the complaints and the resolution of the complaints at the first available opportunity.

D. Technical Assistance

The IURA staff will provide reasonable technical assistance to groups representing persons of low- and moderate-income that request such assistance in developing proposals for funding assistance under any programs covered by the Consolidated Plan. The assistance need not include the provision of funds to the groups.

END