



CITY OF NASHUA, NH

CITIZEN PARTICIPATION PLAN

For

Community Development Block Grant and
HOME Investment Partnership Program

**Donnalee Lozeau, Mayor
City of Nashua
City Hall, 299 Main Street
Nashua, NH 03060**

Adopted June 8, 2010

**City of Nashua, New Hampshire
Citizen Participation Plan
for the 2010-2015 Consolidated Plan**

Background

The City is required by the Department of Housing and Urban Development (HUD) to adopt a Citizen Participation Plan that sets forth the jurisdiction's policies and procedures for citizen participation (24 CFR 91.105) in the development of its Consolidated Plan, substantial amendments to the Consolidated Plan and performance reports. This Citizen Participation Plan is incorporated as part of the City's 2010-2015 Consolidated Plan.

HUD regulations indicate that when a jurisdiction has an existing citizen participation plan that meets earlier regulations, established under the Housing and Community Development Act of 1974, it may update such plan to meet the specifications for the Consolidated Plan. Nashua's Citizen Participation Plan must be updated to reflect the current requirements of 24 CFR 91.105.

Encouragement of Citizen Participation

The City of Nashua encourages all of its citizens to participate in the development of its Consolidated Plan, Annual Action Plan, any substantial amendments to the Consolidated Plan and Consolidated Annual Performance and Evaluation Report (CAPER). The City will especially encourage participation by low and moderate-income persons, particularly those living in slum and blighted areas, as defined by HUD, and in areas where CDBG funds are proposed to be used by implementing the following strategies:

1. Hold meetings in low-income target neighborhoods. Particular focus will be paid to the neighborhoods known locally as the *Tree Streets* and *French Hill*. These neighborhoods have the highest density of low-income residents and include the following census tracts: 105, 107, 108 and parts of 104 and 106. Notices of public meetings affecting the residents of predominately low-income neighborhoods will be posted in locations easily accessible to the residents, translated into alternate languages as appropriate.
2. Conduct surveys by mail, phone or door-to-door techniques, ideally by bi-lingual persons and at a minimum provided in written format in alternate languages.
3. Use the internet to access those residents least likely or unable to participate in public hearings. The internet will provide convenient access for all residents to participate in the development of the above Plans.
4. When feasible, notify residents of Consolidated Plan activities through various media sources, such as local public access channel and social media, postings within target neighborhoods (local markets, community centers, etc).
5. Solicit views of non-profit and service agencies.
6. Hold public meetings at fully accessible locations. Additionally, the City will provide translation, hearing and/or vision impaired services with five (5) days advance notice to the Urban Programs Department.
7. Encourage the Nashua Housing Authority (NHA) and its tenants to participate in the development and implementation of the above Plans, along with other low income residents of targeted revitalization areas in which the developments are located. The City shall provide information to the NHA about relevant consolidated plan activities so that the NHA can make this information available at their annual public hearing.

Citizen comment on the citizen participation plan and amendments

The City will provide citizens with a reasonable opportunity to comment on the original citizen participation plan and on substantial amendments to the citizen participation plan, and will make the citizen participation plan public. The comment period will be no less than 14 days following a public notice advertised in the *Telegraph*, the City's newspaper of general circulation. The citizen participation plan will be provided, upon request, in a format accessible to persons with disabilities.

Development of the Consolidated Plan

Before the City adopts a Consolidated Plan, the City will make available to citizens, public agencies, and other interested parties information that includes the amount of assistance the jurisdiction expects to receive (including grant funds and program income) and the range of activities that may be undertaken, including the estimated amount that will benefit persons of low- and moderate-income. This information will be provided through public notices, posting to the City's website (www.nashuanh.gov) and public hearings.

The City, through implementation of its federal programs (whether directly or through subrecipients), will minimize the displacement of individuals. On occasion, temporary relocation may be required for the health and safety of occupants. In those cases the City (or subrecipient) will assist the individual(s) in seeking temporary housing accommodations, provide an overview of services available and, if funds are available, offer financial assistance to offset the costs of temporary relocation. If the City provides, or proposes to provide, any CDBG, HOME, or other HUD-funded assistance to acquire, demolish, bring any existing housing units up to the minimum local health and building code requirements, or any action results in the direct permanent displacement of any legal resident(s), it will comply with the procedures, and provide the benefits, outlined in the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (42 U.S.C. 4601), as amended; the implementing regulations issued by the Department of Transportation at 49 CFR 24; and Section 104(d) of the Housing and Community Development Act of 1974 [42 U.S.C. 5304(d)]. Prior to any action that will result in the displacement of any existing resident(s) of existing housing unit(s), the City will notify all affected residents of the intended displacement action, and the extent of the benefits that will be available to each impacted person as outlined in 42 U.S.C. 4601 and 5304(d), and 49 CFR 24.

The citizen participation plan also must set forth the jurisdiction's plans to minimize 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 jurisdiction expects no displacement to occur.

A notice will be advertised in the *Telegraph* to inform the public that a draft Consolidated Plan, or draft annual Action Plan is available to examine and is subject to public comment. The notification will provide a summary of the proposed Consolidated Plan, or annual Action Plan, and will describe the contents and purpose of the particular plan. The notice will also be posted on the City's home page (www.nashuanh.gov) and on bulletin boards at the locations below. The public notice will state that copies of the particular Plan, in its entirety, will be available for review on the City's website and at the following locations for 30 days and that a reasonable number of free written copies will be provided to citizens and groups, as requested (unlimited electronic copies will be provided) :

Community Development Division (CDD)
City Hall
229 Main Street, 2nd floor
Nashua, NH 03060

Nashua Public Library
2 Court Street
Nashua, NH 03060

City Clerk's Office
City Hall
229 Main Street, 1st floor
Nashua, NH 03060

At least one public hearing will be held during the development of the Consolidated Plan. Public hearings are discussed in more detail below. The City will consider any comments or views of citizens received in writing, or orally at the public hearings, in preparing the final consolidated plan. A summary of these comments or views, and a summary of any comments or views not accepted and the reasons therefore, shall be attached to the final consolidated plan.

Amendments

HUD requires jurisdictions to define what constitutes a substantial amendment. When a substantial amendment is proposed, HUD further requires certain standards be met, such as comment periods and public hearings. The City defines a substantial amendment to the Consolidated Plan or annual Action Plan as a change in the use funds from one eligible activity to another that is greater than 30% of the HOME program funds and 20% of the CDBG program funds. Substantial amendments to the Plan must be authorized by the Board of Aldermen and submitted to HUD by the Mayor. The public will also be notified by advertising the amendment in the local newspaper. The advertising of the substantial amendment will begin a 30-day citizen review and comment period. The City will consider any comments or views of citizens received in writing or orally during the comment period. A summary of these comments or views, and a summary of any comments or views not accepted and the reasons therefore, shall be attached to the substantial amendment of the consolidated plan. The amendment will then be submitted to HUD and made available at the Nashua Public Library, City Clerk's Office, and the CDD. The Mayor, as the Certifying Official, will submit a letter to HUD authorizing the amendment after the thirty-day comment period and will implement the amendment at that time.

Minor amendments (which do not require a 30-day comment period or public hearing) may be made from time to time, including a change in the goal, priority, or activity of the Consolidated Plan; carrying out an activity, using funds from any program covered by the Consolidated Plan (including program income), not previously covered in the Action Plan; or changes to the purpose, scope, location, or beneficiaries of an activity included in the annual Action Plan.

Minor amendments must be authorized by the Board of Aldermen and submitted to HUD by the Mayor. Amendments will be made public through posting at the City Clerk's Office, the Public Library and on the City's website. Amendments involving at least \$25,000 will also be advertised in the local newspaper. The amendment may be implemented immediately after Board of Aldermen approval. A list of amendments will be submitted to HUD each quarter.

Performance Reports

At the end of each program year, a Comprehensive Annual Performance and Evaluation Report (CAPER) must be submitted to HUD by September 30th. The CAPER gives an actual account of activities and details how the City maintained and expended funds for that program year.

Upon completion of the CAPER, the City will make the report available to the general public for a fifteen (15) day review and comment period. Any public comments will be included in the CAPER submitted to HUD. The City will provide a notice in the local newspaper for the availability of the CAPER, which will begin the fifteen-day review and comment period. A public notice will be advertised at least one week in advance, and published on two occasions prior to the review period. The notice and the draft CAPER will also be made available to the public through the City's website. A summary of these comments or views shall be attached to the performance report.

Public Hearings

The City will provide at least two (2) public hearings during the program year. The first hearing will be during the development of Consolidated Plan, prior to the publication of the proposed Plan. This purpose of the first hearing is to obtain citizen input on past performance and future needs. It will also provide an opportunity to respond to proposals and questions related to CDBG and the HOME Investment Partnership Program. This public hearing will take place early in the calendar year.

A second public hearing will be held when the Draft Annual Action Plan (and/or Consolidated Plan) has been completed and has been advertised to provide the required 30-day public review and comment period.

In the course of developing their recommendation for a spending plan, the Board of Aldermen's Human Affairs Committee may hold additional public meetings to provide information on the solicitation of proposals and to review all proposals under consideration. All public meetings of this nature will be advertised in accordance with the applicable provisions of the New Hampshire Access to Governmental Records and Meetings Law (RSA 91-A), including postings of public notice of the meeting.

All public hearings will be advertised by publication no later than two weeks prior to the hearing date in the *Telegraph* and posted on the City's website. The City will consider any comments or views of citizens received in writing or orally at a public hearing. Each hearing will be held in the evening at facilities that are handicapped accessible. Locations may include City Hall, the Nashua Senior Center, various schools and the Nashua Public Library. All of these locations are convenient to potential and actual beneficiaries, and will accommodate persons with disabilities. Each public hearing notice will include the availability of an interpreter if a significant number of non-English speaking or hearing-impaired persons are expected to participate at the hearing. If notified at least five (5) days in advance of the hearing, the City will provide translation, vision or hearing impaired services as needed. Each public hearing notice will indicate this policy and provide a telephone number to contact the City.

Availability and Access to Records

The consolidated plan, substantial amendments, and the performance report will be available to the public, including the availability of materials in a form accessible to persons with disabilities, upon request. These materials may be provided in written or electronic format, both on the City's website and directly if requested.

The City will provide citizens, public agencies, and other interested parties access to information and records relating to the consolidated plan and the use of assistance under the programs covered by this part during the preceding five years. Citizens must allow the City fourteen (14) calendar days to compile the information requested.

Technical Assistance

The City encourages requests from new or inexperienced agencies that represent low- and moderate- income individuals. The City will offer technical assistance each year upon the release of the annual CDBG application for funding. The scheduled technical assistance workshop will be included in the public notice of availability of funding applications, advertised in the *Telegraph*. All agencies who request an application will be notified directly via e-mail or telephone and encouraged to attend. Additionally the workshop will be posted on the City's website. This assistance shall not include the provision of funds to the groups.

Complaints

Citizens with complaints related to the Consolidated Plan, amendments, and the annual performance report must submit the complaint(s) in writing to:

Community Development Division
ATTN: Urban Programs Manager
City Hall
229 Main Street, 2nd floor
Nashua, NH 03060

If the citizen is unable to submit the complaint in writing, they must schedule a meeting with the Urban Programs Manager at the above-mentioned address and a formal complaint letter will be transcribed. The person must sign the letter and submit an address for response. Upon receipt of the written complaint, the CDD will respond to the complaint in writing within fifteen (15) working days.

Use of the Citizen Participation Plan & Jurisdiction Responsibility

The City must follow its Citizen Participation Plan. However, the requirements for citizen participation do not restrict the responsibility or authority of the jurisdiction in the development and execution of the City's Consolidated Plan.