CITY OF BRADFORD CITIZEN PARTICIPATION PLAN CDBG AND HOME PROGRAMS

INTRODUCTION

The City of Bradford is the recipient of federally funded grant programs including the Community Development Block Grant (CDBG) Program and HOME Program from the U.S. Department of Housing and Urban Development (HUD) passed to the PA Department of Community and Economic Development (DCED). The City of Bradford encourages citizen involvement in the planning, implementation and evaluation of its CDBG and HOME Programs. In accordance with 24 CFR 570.486 (Local Government requirements) the City of Bradford shall:

- (1) Provide for and encourage citizen participation, particularly by low and moderate income persons who reside in slum or blighted areas and areas in which CDBG funds are proposed to be used;
- (2) Ensure that residents will be given reasonable and timely access to local meetings, consistent with accessibility and reasonable accommodation requirements in accordance with section 504 of the Rehabilitation Act of 1973 and the regulations at 24 CFR part 8, and the Americans with Disabilities Act and the regulations at 28 CFR parts 35 and 36, as applicable, as well as information and records relating to the City of Bradford's proposed and actual use of CDBG funds;
- (3) Furnish information to residents, including but not limited to:
 - (i) The amount of CDBG funds expected to be made available for the current fiscal year (including the grant and anticipated program income);
 - (ii) The range of activities that may be undertaken with the CDBG funds;
 - (iii) The estimated amount of the CDBG funds proposed to be used for activities that will meet the national objective of benefit to low and moderate income persons; and
 - (iv) The proposed CDBG activities likely to result in displacement and the City of Bradford's Anti-Displacement and Relocation Plans required under § 570.488.
- **(4)** Provide technical assistance to groups that are representative of persons of low- and moderate-income that request assistance in developing proposals (including proposed strategies and actions to affirmatively further fair housing) in accordance with the procedures developed by the State. Such assistance need not include providing funds to such groups;
- (5) Provide for a minimum of two public hearings, each at a different stage of the program, for the purpose of obtaining residents' views and responding to proposals and questions.

- **(6)** Provide citizens with reasonable advance notice of, and opportunity to comment on, proposed activities in an application to the state and, for grants already made, activities which are proposed to be added, deleted or substantially changed from the City of Bradford's application to the State. Substantially changed means changes made in terms of purpose, scope, location or beneficiaries as defined by criteria established by the state.
- (7) Provide citizens the address, phone number, and times for submitting complaints and grievances, and provide timely written answers to written complaints and grievances, within 15 working days where practicable.

MEETING CITIZEN PARTICIPATION REQUIREMENTS – PUBLIC HEARINGS

PUBLIC NOTICES - The City of Bradford will hold two public hearings related to the submission of CDBG Entitlement and CDBG Competitive Grant Program grant applications. A single public hearing will be held for HOME Program applications and CDBG modifications. The public hearing notices will be published in the local daily newspaper, *The Bradford Era* at least five days prior to the day of the public hearing. HOME Program notices will be published in the non-legal section of the newspaper. The public hearing meeting noticed will also be placed on the City of Bradford's Office of Economic and Community Development (OECD)'s website - bradfordpa.org. CDBG Entitlement/Competitive Grant public hearing advertisements will provide the public information on the time and place of the meeting, provide for the purpose of the public hearing, the proposed amount of CDBG funding to be applied for and potential uses (second public hearing notice), LMI benefit information, anti-displacement requirements, ADA accessibility accommodations, non-English speaking accommodations (if needed) and the receipt of written comments on the prior use of CDBG Program funding.

HOME Program public hearing notices will provide information on the intended use of HOME funding, the location of the use of the HOME funds, the time and location of the public meeting, comment period and application schedule.

PUBLIC HEARINGS - Public hearings will be held prior to a regularly scheduled City Council meeting in City Council Chambers, City Hall, 24 Kennedy Street, Bradford, PA. The first public hearing will be used to:

- 1. inform the community on regulations of the CDBG Program including an explanation of the national objectives of the program.
- 2. Update the public on the prior use of CDBG activities over the past three to five years.
- 3. Solicit ideas, proposals and potential new uses of CDBG funds for the City's Three Year Plan.
- 4. Provide comment on the potential displacement of residents as a result of the use of CDBG funds.

The public comment period will be at least ten calendar days from the publishing of the public hearing notices.

The second public hearing for the CDBG Entitlement Program and the public hearing notices for a CDBG Competitive Grant application will be used to:

- 1. Identify activities proposed to be undertaken with CDBG funds.
- 2. The amount of CDBG funds allocated for each activity.
- 3. The national objective to be met for each activity.
- 4. Identification of activities identified in the Three Year Community Development Plan.
- 5. Discuss the schedule for City Council to approve the application and the submission of the grant application to DCED.

The City will allow for a period of time from the second public hearing for public comment and review of those comments prior to the City Council's authorization to submit the CDBG grant application. If no comments are received, the application will be considered for approval at the City's next scheduled City Council meeting.

The City will follow the citizen participation process for the CDBG Program modifications with respect to advertising for a public hearing as it would for the second CDBG Application public hearing. The public notice will provide:

- 1. The date and time of the public hearing.
- 2. The purpose of the proposed modification.
- 3. Comment period.
- 4. Notice that the modification will be made available to the public upon approval by City Council.

All public hearings will have a written summary of the meeting and any comments made during the meeting shall be included in the summary.

CONTACT AGENCY/PERSON

The City of Bradford's Office of Economic and Community Development (OECD) is responsible for the development, publication and implementation of citizen participation for the City's federal programs. The OECD will monitor the citizen participation process; provide information on the City's federal programs to the public; monitor the citizen participation process, maintain citizen participation files, which contain documentation that demonstrates compliance with all of the requirements contained in this Citizen Participation Plan; and propose any changes to the City of Bradford's Citizen Participation Plan as necessary.

All questions, written comments or complaints concerning the City of Bradford's federal programs should be directed to the OECD's Executive Director with a mailing address of OECD, PO Box 490, Bradford, PA 16701 or email address of sandrews@bradfordpa.org. Written responses to written comments and/or complaints shall be provided within fifteen (15) working days of the receipt of such comments or complaints where practicable.

TECHNICAL ASSISTANCE

Upon request, the OECD will provide technical assistance to groups of persons of LMI or their representatives, which request assistance in developing proposals (including proposed strategies and actions to affirmatively further fair housing). The level and type of technical assistance shall be determined by the OECD.

CARES ACT WAIVERS

Certain waivers for citizen participation requirements have been authorized by the U.S. Department of Housing and Urban Development. These waivers include:

- 1. Virtual meetings may be conducted for HUD Program Grant Years 2019 and 2020 and CARES Act funding (including CDBG and HOME) only while the need for social distancing requirements remain in the City of Bradford as determined by a public health official or the City Council of the City of Bradford. This only applies to any activity seeking funding and does not need to be specific to a COVID-19 activity to host a "virtual" meeting.
- 2. **Citizen Comment Period** The CARES Act also provides for a waiver of the length of the period for citizen comment when activities are covered in the modification or application, which addresses the response to the coronavirus. The comment period is reduced to five (5) days).

ADOPTED THE 12 TH DAY OF MAY 2020 BY CITY COUNCIL RESOLUTION	
CITY ADMINISTRATOR	MAYOR