

CITY OF BRISTOL CDBG PROGRAM:

2020 CITIZEN PARTICIPATION PLAN FOR CONSOLIDATED PLANNING, ANNUAL ACTION PLANNING, and ASSESSMENTS OF FAIR HOUSING

The City of Bristol, through the Economic and Community Development Department, will provide access for the greatest possible public participation in developing its Community Development Block Grant program (CDBG) planning, assessment, and funding process and documents.

The City encourages year-round public participation through monthly meetings of the Economic and Community Development Board. News articles concerning CDBG projects are frequently published in the Bristol Press and Bristol Observer, both papers having a wide circulation in town. At various times throughout the year, the ECD updates its pages on the City website: www.bristolct.gov.

This plan specifically addresses the requirements of federal regulations as described in CFR 24 Part 91 for a Citizen Participation Plan, and as of 2020, includes amendments to that section referring to the Assessment of Fair Housing (AFH) at CFR 24 Section 5.154.

(1) Encouragement of citizen participation.

The public is encouraged to attend and speak at all meetings. When appropriate and feasible, neighborhood meetings have been and can be arranged. The ECD will conduct outreach to those populations who have historically experienced exclusion, including racial and ethnic minorities, limited English proficient (LEP) persons, and persons with disabilities. The ECD will consult with the Bristol Housing Authority, other public and private agencies that provide assisted housing, health services, and social services, including those focusing on services to children, elderly persons, persons with HIV/AIDS and their families, and homeless persons. The ECD will consult with the Naugatuck Valley Council of Governments, its regional government agency, and regionally-based organizations that represent protected class members and organizations that enforce fair housing laws when preparing both the AFH and the Consolidated Plan (Con Plan).

In accordance with federal regulations Section 91.100, the ECD will specifically consult with organizations that address affirmatively furthering fair housing such as the Connecticut Fair Housing Center, the Housing Education and Resource Center, and the Fair Housing Association of Connecticut.

Bristol commences its annual planning with solicitation of proposals by email, announcements at public meetings such as Bristol Cares (a monthly gathering of social service agencies), and two public advertisements. Display ads are run in local newspapers, posted to the City's website (www.bristolct.gov) and displayed at various locations throughout the City requesting proposals, listing eligible activities, offering assistance in formulating a proposal, and announcing the dates of Public Hearings. The email list includes past applicants and recipients, local community agencies, social service agencies, homeless shelters, city departments, public housing tenant councils, and any interested persons or parties who during the prior year have expressed interest.

Public meetings are generally held in the Council Chambers of City Hall (an accessible building and meeting area) in the evening. Following long-standing local procedure and the State of Connecticut laws, these hearings and meetings are scheduled in advance, posted, recorded, and open to the public with minutes prepared and available to any interested party. The meetings receive advance publicity and are covered by the local media. When available, written materials are provided at these events.

In the event of a health crisis, such as the Covid-19 pandemic experienced in 2020, technology including videoconferencing (Zoom and Webex) may be utilized to enable Public Hearings and Public Meetings to proceed on schedule and continue to be open for public participation.

If there is a need for an interpreter, the City will make every effort to secure one.

(2) Information to be provided.

- a. The consultation process for the Assessment of Fair Housing (AFH) will be completed and submitted for HUD approval in the year prior to the planning year for an updated five-year Consolidated Plan (Con Plan). Proposed analysis and relevant documents including HUD-provided data will be made available to the public prior to a Public Hearing. A 30-day public comment period will be open prior to submission of the AFH to HUD.
- b. For 5-Year Consolidated Plans and Annual Plans, a Public Hearing will be conducted to solicit comments on community needs and proposals submitted to meet these needs. The remainder of the planning timeline is estimated but somewhat dependent upon the schedule of the U. S. Congress. HUD informs the City as to its options if the federal schedule is delayed. The Public Hearing announcement is advertised twice and posted at various places in the City.

After the first annual Public Hearing there is a public meeting of the Policy Committee of the ECD. The Policy Committee is responsible for the preparation of a proposed use of funds and oversight of CDBG allocations. The ECD generally receives requests for at least

twice the amount of funds available and the Policy Committee gives very serious consideration to the comments heard at the hearings in developing the annual Proposed Use of Funds document, according to priorities updated in/for the Con Plan.

When the Policy Committee has established the Proposed Use of Funds, the City holds a second Public Hearing. This hearing is advertised twice, with a list of the programs and dollar amounts that are recommended for funding, requesting public comment and inviting public participation. Contact numbers and emails of staff are included in the ads to facilitate public comment before and after the actual hearing date. The Proposed Use of Funds is also referred to the Planning Commission for comment. The official 30-day comment period begins after advertisement of the Proposed Use of Funds, continuing up to its approval by the Economic and Community Development Board.

The Policy Committee considers comments from the Planning Commission and the public comments in their Proposed Use of Funds. The Policy Committee's final recommendations are then presented to the full Economic and Community Development Board for approval and/or modification. A copy of the Proposed Use of Funds document is posted at the Bristol Housing Authority; the Bristol Public Library and Manross Library in Forestville; and City Hall. The ECD forwards its recommendations to the City Council for its approval. Drafts of the AFH, Con Plan, and Annual Action plans are posted on the city website with a notation that these plans are not final without HUD approval.

Once HUD approval has been received, the Board of Finance, at a public meeting, appropriates the funds.

Every meeting is public, covered and reported on by the local news media, and preserved in minutes available to the public. Comments and modifications are possible at any time prior to submission to HUD.

(3) Access to records.

The Economic and Community Development Department will make available, at its office at City Hall, access to information and records relating to its Con Plan, AFH, and any programs assisted with CDBG funds to any interested citizens.

(4) Technical assistance.

Technical assistance has always been and will be offered at whatever level of needs of the applicant or organization. When funds are not sufficient or a program is not eligible, the ECD office makes every effort to refer an applicant to another source of funds.

(5) Public hearings.

The Economic and Community Development Department will hold Public Hearings to obtain citizen views. See Items (1) and (2) above. In addition, the City annually publishes a legal notice and invites comments on the use of funds for the past program year prior to submitting the Consolidated Annual Performance and Evaluation Report (CAPER) to HUD.

(6) Comments and complaints.

The Economic and Community Development Department will consider any comments or complaints made by a citizen. A summary of any comments, including those not accepted and the reasons therefore, will be part of the Consolidated/Annual Plan. The ECD has always responded to written (and oral) complaints and will continue to do so.

(7) Criteria for amendment to plan.

HUD regulations require an amendment to a Consolidated Plan when the jurisdiction makes one of the following decisions.

- i. to make a change in its allocation priorities or a change in the method of distribution of funds;
- ii. 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
- iii. to change the purpose, scope, location, or beneficiaries of an activity.

Within this range of amendments, there are amendments which are defined as Substantial Amendments. For purposes of the Bristol Consolidated Plan process, a Substantial Amendment shall be defined as one wherein the change in the distribution of funds for a revised or new activity exceeds 10 percent of the annual entitlement under the CDBG program.

For such Substantial Amendments, the ECD shall prepare a report on the nature of the amendment which shall be made available by public notice for 30-day public comment period. The amendment shall be approved by the Economic and Community Development Department board and referred to the Bristol City Council for approval. Substantial Amendments shall be submitted to the U.S. Department of Housing and Urban Development (HUD) within 15 days of local approval.

For those amendments not defined as Substantial, the Economic and Community Development Department shall approve such amendments at a regularly scheduled meeting and make the amendments public.