

CITY OF BETHLEHEM

CITIZEN PARTICIPATION PLAN

DECEMBER, 1995

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Introduction

The City of Bethlehem, through the Department of Community and Economic Development, utilizes the programs of various Federal and State agencies including the U.S Department of Housing and Urban Development, the Pennsylvania Department of Community Affairs, etc. to implement housing and community development related activities.

The Department of Community and Economic Development recognizes the obligation to provide adequate information to citizens regarding those programs through which it may seek funding. Therefore, the department will insure that adequate information is provided to local citizens to evaluate various proposals. The City will also provide the proper forum to obtain citizen views on housing and community development related issues.

The City receives annual grants from the U.S Department of Housing and Urban Development resulting from its classification as an "entitlement" community. Title I of the Housing and Community Development Act of 1974 as amended provides a program for Federal financial assistance in the form of annual community development block grants. These funds are to be used in connection with the carrying out of the City's Five-Year Consolidated Plan. The program includes the activities to be undertaken to meet the City's Community Development needs and objectives identified in its Consolidated Plan, together with the estimated costs and the location of such activities; it includes resources other than Federal block grants which are expected to be made available toward meeting its identified needs and objectives and takes into account appropriate environmental factors. The City is also eligible to apply for supplemental funds under the section 108 Loan Guarantee Program. The City may exercise its option to apply for section 108 Loan Guarantee funding and in so doing will follow the procedures outlined in this Citizen Participation Plan.

In preparing the Consolidated Plan and any amendments and reallocations of funds, citizen participation is required by Section 91.105 of the Federal Regulations governing Community Development Block Grant, 24 CFR 01.

The Department of Community and Economic Development recognizes that persons affected by public action should have a voice in policy formulation. Although the various housing and community development related activities are designed to have a long term beneficial effect on the community, these activities may also have an adverse impact on some individuals. Therefore, it is important that citizens know what is being planned and be given an opportunity to present their views.

The City recognizes the need to consult and coordinate with appropriate public and private agencies, such as the State and other local jurisdictions, local public housing agencies and participating in an approved Comprehensive Grant Program, and among its own departments, to assure that its programs and plans are comprehensive and address any statutory purposes. It will also confer with social service agencies regarding the housing needs of children, elderly persons, persons with disabilities, homeless persons, and other categories of residence. The City will

consult with State and local health and child welfare agencies, and examine existing data on the address of housing units in which children have been identified as lead poisoned.

In order to comply with the spirit of the program requirements relative to citizen participation, the City has developed this citizen Participation Plan. Generally, the plan is designed to insure the involvement of affected persons and other concerned citizens, the openness and freedom of access to information, the adequate and timely presentation of pertinent data, the submission of views and proposals, and the continuity of citizen participation through each stage of resulting activities. In accordance with 570 CFR 411 (m) the City of Bethlehem certifies that "citizens likely to be affected by the project regardless of race, color, creed, sex, national origin, familial status, or handicapped, particularly low and moderate income persons" will be provided an opportunity to comment on its Consolidated Plans, amendments and performance reports.

Access to Records

The City shall provide for full public access to citizens, public agencies, and other interested parties, including those most affected, to information pertaining to any program under which funding is sought or concerning the use of funds from any program used for housing and community development activities and administered by the Department of Community and Economic Development. Affirmative efforts will be made to make adequate information available to citizens, especially those of low, very low and poverty income and those residing in slum and blighted areas and in areas where funds from federal or state programs are proposed to be used. At the time the City initiates the process to seek specific funding, the following program information shall be provided:

- A. The total amount of funds expected to be available to the City for housing and community development activities under program(s) being assessed.
- B. The range of activities that may be undertaken with these funds;
- C. The estimated amount of funds proposed to be used for activities that will benefit low, very low, and poverty income persons;
- D. The possibility of residential and/or commercial displacement resulting from program implementation and the plans for minimizing such displacement, and;
- E. The types and levels of assistance to be made available to persons displaced by contemplated activities.

Upon completion of an application for funding by the Department of Community and Economic Development and submission of the application to the appropriate agency, the City shall publish a notice in one or more newspapers of general circulation if program regulations so require. The notice shall indicate that the necessary documentation has been submitted and is available to interested parties upon request. The City shall make copies of the appropriate documentation

available in the Department of Community and Economic Development, 10 East Church Street, Bethlehem, PA 18018 and any other designated location.

Housing and Community Development Plan

The U.S Department of Housing and Urban Development (HUD) requires the submission a single consolidated planning application including all aspects of the Community Development Block Grant (CDBG) Program, Emergency Shelter Grants (ESG) Program, Home Investment Partnerships (HOME) Program, and the Housing Opportunities for persons with AIDS (HOPWA) Program. The City of Bethlehem is a direct entitlement under the CDBG program and the HOME Investment Partnerships Program with a program year of January 1 to December 31 of each year. The revised reporting requirements replaced the general performance reports on each program with one report; the Consolidated Annual Performance and Evaluation Report (CAPER) which is submitted to HUD 90 days after the end of the City's program year.

The CP serves the following functions. (1) A planning document for communities, which builds on a participatory process at the lowest levels; (2) An application for federal funds under HUD's formula grant programs; and (3) A strategy to be followed in administering HUD programs.

Upon completion of the proposed CP, the City shall publish a summary of the Plan and provide access to the complete draft Plan for 30 days to give sufficient time to permit citizens to comment on the Plan prior to its approval and adoption by the City Council. The notice will appear in a non-legal section of a paper of general circulation at least seven (7) calendar days prior to availability of the Plan and will indicated the locations at which the Plan will be made available for public review.

Upon approval of the CP, the City shall publish a notice in a newspaper of general circulation if program regulation so require. The notice shall indicate that necessary documentation has been submitted and is available to interested parties upon request.

All notices will be posted on the city's website.

Technical Assistance

Technical assistance in the form of the Department of Community and Economic Development, or other City agencies or third party contractors to the City or its agencies will provide technical assistance to citizen participants low, very low, and poverty income groups or persons to enable them to understand the requirements associated with various programs such as Davis-Bacon Fair Labor Standards, environmental policies, equal opportunity requirements, relocation provisions, etc. Technical assistance will also be provided to groups representative of persons of low, very low, and poverty income that request assistance in developing proposals. Such assistance will be made available upon request by interested citizens or organizations to the Director of Community and Economic Development. In addition, the City, through public hearing will review such program requirements and will have available for interested parties handout material dealing with technical program requirements so as to assure understanding

Public Hearings

The City will conduct a public hearing or hearings on specific application proposals in accordance with Federal or State requirements for the subject program under consideration.

An initial hearing will be held to obtain the views of interested citizens and organizations regarding overall community development and housing needs, development of proposal activities, and a review of program performance. The second hearing will be held to obtain the views of interested citizens and organizations on the particular funding application.

Generally, hearings shall be held in the City Hall. Such hearings will be duly advertised. All public hearings will be held in facilities that afford accessibility for persons with disabilities. At least ten (10) calendar days prior to any hearing, a notice shall be published in the non-legal section of a paper of general circulation. The notice will give the date, time, place and topics to be considered at the hearing. Notices will be posted on the city's website.

If the ability to congregate is not in the public's best interest, meetings will be held virtually with instructions for participation listed on the City's website

Notices will also be sent to social service agencies and other public and semi-public groups which may have particular interest or be affected by the proposed program. The City will work through these agencies and groups to encourage participation in the hearing process on the part of low, very low, and poverty income persons who reside in areas where funds will be spent. The City will also work with these agencies and groups to involve persons who reside in low, very low, and poverty income neighborhoods. All notices of the second hearing will also contain a detailed description of the area or areas affected by the project activities in an effort to alert the residents of such proposals and to encourage their participation in the hearing process.

If any organization or group representing affected residents to be involved in the citizen participation process, the City shall place such group on the list of representative groups and organizations. The Director of the Department of Community and Economic Development shall be responsible for maintaining a list of representative groups and organizations. This list shall be updated at the beginning of each program year. Additions to the list must be made formally written or oral request to the City stating the nature of the organization omitted and why it should be included.

The Mayor shall have the responsibility for calling meetings and hearings with citizens likely to be affected by activities undertaken by the Department of Community and Economic Development. The Mayor may delegate assignments to the Director of Community and Economic Development. The Mayor shall also develop procedures for meetings and hearings and for moderating such meetings either directly or through the director.

Written Response

The City will consider and respond in writing to all comments, views or proposals submitted either verbally or in writing at public hearings or meetings. The response to a request for activities or projects shall be made in a timely fashion, but in any case prior to the meeting of the City Council at which approval of the application will be considered.

The City will respond in writing to citizen complaints and/or grievances related to community development and housing programs as soon as possible. Citizen complaints and/or grievances will be responded to in writing within fifteen (15) working days from receipt of such complaint in the Department of Community and Economic Development.

Criteria for Amendment to Programs

The City may decide to amend its approved programs based upon one of the following decisions:

- A. To make a change in its allocation priorities or a change in the method distribution of funds.
- B. To undertake an activity, using funds from any program covered by the Consolidated Plan (including program income) not previously described in an action plan;
- C. To change the use of CDBG funds from one eligible activity to another;
- D. To change the purpose, scope, location, or beneficiaries of an activity.

Substantial Change is defined as the increase or decrease in the cost of an approved activity by more than 25% or the change (increase or decrease) in the service area and/or class of beneficiaries of an activity. Such a course of action would constitute an amendment to an approved program.

In such instance, the City shall provide citizens with reasonable notice of, and opportunity to comment on, such proposed changes in its use of funds. The City will publish a notice to the non-legal section on a paper general circulation of the proposed program change and give interested of affected citizens at least thirty (30) calendar days to submit comment on the amendment. During this thirty day review period, the City will conduct a public hearing to allow interested citizens an opportunity to comment on the proposed amendment. The City shall consider any such comments and, if the City deems appropriate, modify the amendment. The Department of Community and Economic Development will notify the appropriate funding agency of the proposal and provide a description of any changes, a letter transmitting such description to the agency shall be signed by the Mayor.

During periods of disaster response, the City will implement any waivers issued by HUD regarding requirements on public participation and the Action Plan and Consolidated Plan amendment process.

Non-English Speaking and Non-Speaking Residents

The City will take such measure as are appropriate to accommodate the need of non-English speaking residents in the case of public hearings where a majority of the participants at the hearing are expected to be non-English speaking residents. Upon request, handout material prepared for such hearings will be bilingual to accommodate the needs of attendees. Upon written request the City will engage the services of a bilingual person to assist in the presenting relevant information at the hearing.

Furthermore, the City will provide interpretation services for any non-speaking person who may require such assistance in understanding a particular program being planned or administered by the department of Community and Economic Development.

Notice of Annual Performance Report

The City may be required to file a performance report to a grantor agency. The Department of Community and Economic Development will publish a notice of completion of the report in sufficient time to permit citizens to comment on the report prior to its submission to the appropriate agency, The notice will appear in a paper of general circulation at least fifteen (15) calendar days prior to the submission of the report and will indicate the locations at which the

Use of Plan

The City shall follow the Citizen Participation Plan for all funding applications and amendments to the approved applications.

Modification of Plan

The Citizen Participation Plan may be modified from any time by the City provided such revisions are consistent with Federal and State law, regulations and administrative requirements covering citizen participation.

Any questions or comments on this plan or request for information should be directed to: City of Bethlehem Department of Community and Economic Development, 10 East Church Street, Bethlehem, PA 18018. Telephone Number (610) 865-7085. The City's TDD number is (610)865-7171.