

CITIZEN PARTICIPATION PLAN



BROCKTON, MASSACHUSETTS



Brockton Redevelopment Authority

Updated July 2019

CITY OF BROCKTON CITIZEN PARTICIPATION PLAN

The City of Brockton annually receives Community Development Block Grant (CDBG), HOME Investment Partnerships Program (HOME) and Lead Based Paint Hazard Control (LBPHC) funds from the U.S. Department of Housing and Community Development (HUD), which it administers through the Housing and Community Development Division of the Planning and Development Department. The primary purpose of these formula grant programs is to develop viable communities through the provision of decent housing, a suitable living environment and expanding economic opportunities for low- and moderate-income persons. As a recipient of these entitlement program funds, the City is required to produce the following documents:

- **Consolidated Plan** – a five-year plan that documents Newton’s housing and community development needs, outlines strategies to address those needs, and identifies proposed program accomplishments
- **Annual Action Plan** – an annual plan that describes specific CDBG- and HOME-funded projects that will be undertaken over the course of the upcoming fiscal year
- **Consolidated Annual Performance and Evaluation Report (CAPER)** – an annual report that evaluates the use of CDBG and HOME funds following the close of the fiscal year
- **Analysis of Impediments to Fair Housing Choice** – a five-year plan that analyzes disparities in access to housing opportunities in the City and identifies priorities and goals to address these issues.

This Citizen Participation Plan has been developed to provide citizens and other interested parties with opportunities to participate in an advisory role in the planning, implementation and evaluation of the CDBG, HOME and LBPHC programs which primarily benefit Brockton’s low- and moderate-income residents, and to review and comment on each of the documents listed above.

Citizen participation in CDBG, HOME and LBPHC program activities ranges from conducting needs assessments and strategic planning to providing input on project selection, development, implementation and evaluation. The Citizen Participation Plan outlines the City’s responsibility to solicit active citizen participation. The goals of the Citizen Participation Plan are to:

- Encourage citizen participation by all Brockton residents, emphasizing the involvement of low- and moderate-income residents, persons with disabilities, minorities, non-English speaking persons and residents of assisted housing;
- Inform citizens of the Brockton Consolidated Plan, CAPER, the Analysis of Impediments to Fair Housing Choice and the Annual Action Plan, including funds available from CDBG, HOME, LBPHC and other Continuum of Care Homeless Programs and eligible activities under these programs;
- Give all citizens an opportunity to identify and respond to priority needs;
- Give all citizens an opportunity to identify and respond to proposed projects, actions, policies and the use of funds; and
- Give all citizens an opportunity to review and comment on program performance.

ELIGIBLE CDBG PROJECTS OR ACTIVITIES

Among the activities eligible for financial support under the CDBG Program are:

1. Acquisition by purchase, lease, donation, or otherwise, of real property for eligible public purposes;
2. Disposition of real property acquired with CDBG funds or its retention for public purposes;
3. Acquisition, construction, reconstruction, rehabilitation, or installation of public facilities and improvements (except buildings or portions of buildings used predominantly for the general conduct of government) carried out by the City or other public or private non-profit entities;
4. Clearance, demolition, and removal of buildings and improvements;
5. Public services, including, but not limited to, public safety concerned with employment, crime prevention, childcare, health, drug abuse, education energy, conservation, welfare, or recreational needs, emergency shelters;
6. Interim assistance when immediate action is necessary to arrest deterioration and when permanent improvements will be carried out as soon as practicable, and to alleviate emergency conditions threatening the public health and safety, except for the repair of parks and playgrounds, snow removal and similar forms of street clearance, and improvements of private properties;
7. Payment of the cost of completing an urban renewal project funded under Title I of the Housing Act of 1949, as amended;
8. Relocation payments and other assistance for permanently or temporarily displaced individuals, families, businesses, non-profit organizations, and farm operations where required by federal regulations or otherwise determined appropriate;
9. Payment to housing owners for losses of rental income incurred in hold, for temporary periods, housing units to be utilized for the relocation of individuals and families displaced by program activities;
10. Special projects directed to remove materials and architectural barriers which restrict the mobility and accessibility of elderly or handicapped persons;
11. Acquisition, construction, reconstruction, rehabilitation, or installation of distribution lines and facilities of privately-owned utilities;
12. Rehabilitation of privately-owned buildings and improvements, low income public housing and other publicly owned residential buildings and improvements, and non-residential buildings and improvements otherwise eligible for assistance;
13. Rehabilitation, preservation, and restoration of publicly or privately-owned properties listed in or eligible to be listed in the National Register of Historic Places, a state or local inventory of historical places, or designated as a state or local landmark or historic district by appropriate law or ordinance.
14. Renovation of closed school buildings for use as an eligible public facility, commercial or industrial facility, or housing;
15. Special activities determined as necessary or appropriate to carry out an economic development project, excluding the construction of housing;

16. Improvements to increase the efficient use of energy and water;
17. Support to neighborhood based non-profit organizations or entities, organized under Section 301(d) of the Small Business Investment Act of 1958, and Local Development Corporations to carry out a neighborhood revitalization, community economic development, or energy conservation project;
18. Planning, policy, management, and capacity-building activities; and
19. Administrative costs related to planning and execution of community development activities financed by CDBG funds and housing activities covered in the Consolidated Plan;
20. Any other such new eligible activities as issued by HUD.

INELIGIBLE CDBG PROJECTS OR ACTIVITIES

CDBG funds may not be used for city halls, courthouses, or other buildings and facilities predominantly used for the general conduct of government, except for the removal of architectural barriers and historic preservation or any other such activities as further described under 24 CFR, Part 570.207.

The purchase of equipment, including construction equipment and furnishings and personal property, generally is not eligible, nor is the use of CDBG funds for operating, maintaining, and repairing public facilities and works, general government expenses, political activities, new housing construction, and direct income payments for housing.

CDBG funds are not to be used to replace activities normally undertaken by the City of Brockton.

HOME INVESTMENT PARTNERSHIPS PROGRAM (HOME) ELIGIBLE ACTIVITIES: GENERAL

The HOME Investment Partnerships Program (HOME) 24 CFR, Park 92, funds may be used by the City of Brockton to provide incentives to develop and support affordable rental housing and homeownership affordability through the acquisition (including assistance to homebuyers at or below 80% of median income), reconstruction, or moderate or substantial rehabilitation of non-luxury housing with suitable amenities, including real property acquisition, site improvement, conversion, demolition, and other expenses, including financing costs, relocation expenses of any displaced persons, families, businesses, or organizations, to provide tenant-based rental assistance, including security deposits; to provide payment of reasonable administrative and planning costs; and to provide for the payment of operating expenses of community housing development organizations. The housing must be permanent or transitional housing, and includes permanent housing for disabled homeless persons, and single room occupancy (SRO).

PLANS TO MINIMIZE DISPLACEMENT

It is the intent of the City of Brockton, acting through the Brockton Redevelopment Authority (BRA), to take all steps to minimize residential relocation. A high priority will be given to activities that do not include relocation. All citizen participation and consultation requirements under 24 CFR, Part 91.105 shall be adhered to under the City's Citizen Participation Plan.

In the event that involuntary displacement must occur due to an emergency, the BRA will comply with the acquisition and relocation requirements of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended, as required under Section 570.606(b) and Federal implementing regulations; and it is following a residential antidisplacement and relocation assistance plan as required under Section 104(d) of the Act and in Section 570.606(c); and it will comply with the relocation requirements of Section 570.606(d) governing optional relocation assistance under Section 105(a)(11) of the Act, as amended.

CITIZEN PARTICIPATION

The Chief Executive Officer of the City of Brockton has authorized that the five (5) Board Members of the Brockton Redevelopment Authority, acting through its Executive Director, to be the agency responsible to carry out the expenditure of the Community Development Block Grant Program funds and the HOME Investment Partnerships Program Funds. Four (4) Board Members are named by the Chief Executive Officer of the City of Brockton and the fifth Board Member is named by the Governor of the Commonwealth of Massachusetts. The Board Member serve a five-year term (Serve staggered terms).

Residents of lower income neighborhoods and other residents likely to be affected by the CDBG Program and the HOME Program are to be provided adequate information and the opportunity to express their views on community development and the needs, proposed activities and projected use of funds, and program performance. A copy of 24 CFR, Part 91.105, Citizen Participation Plan, Local governments, is attached to and made part of the Citizen Participation Plan and referenced.

Additionally, low- and moderate-income persons are also encouraged to participate in the development and any revisions to the AFH and the consolidated plan, any substantial amendments to the plan and the performance report. This process shall include persons living in areas designated as a revitalization area, areas designated as a slum and blighted area and areas where CDBG and HOME funds are proposed to be used. This participation is also directed to the non-English speaking community and translations can be made available in other languages upon request, as is assistance for persons with physical or hearing impairments.

The citizen participation plan also encourages the participation of local and regional institutions. Participation is encouraged from Continuums of Care, businesses, developers, nonprofit organizations, philanthropic organizations, and community-based and faith-based organizations in the process of

developing and implementing the AFH and the consolidated plan. Additionally, participation is encouraged in conjunction with Brockton Housing Authority (BHA) consultations, participation of residents of public and assisted housing developments, including any resident advisory boards, resident councils, and resident management corporations, in the process of developing and implementing the AFH and the consolidated plan, along with other low-income residents of targeted revitalization areas in which the developments are located. The City shall make an effort to provide information to the BHA about the AFH, AFFH strategy, and consolidated plan activities related to the City's developments and surrounding communities so that the BHA can make this information available at the annual public hearing(s) required for the PHA Plan.

All CDBG and HOME Program proposed documents, including the AFH, Consolidated Plan, the CDBG Consolidated Annual Performance Evaluation Report (CAPER), will be posted on the City of Brockton's website and the Brockton Redevelopment Authority's website as well as hard copies available at the Office of the Brockton Redevelopment Authority, the Brockton Housing Authority, all public libraries, the Office of the Mayor at City Hall and the Office of the City Clerk. Additionally, copies will be made available free of charge for review and/or distribution to interested residents and the general public at the office of the Brockton Redevelopment Authority. If required, translation may be made available to explain segments of the Plans to non-English speaking people. This will be carried out on a priority basis.

All such proposed documents with comments invited.

REASONABLE ACCESS TO PROGRAM INFORMATION

Residents, public agencies and other interested parties can request, in writing, information and records concerning Brockton's AFH, consolidated plan and its use of assistance under the CDBG, HOME, and LBPHC Programs during the 5-year period preceding the date of the request. The City will make available, within 30 days, any information which does not violate the privacy of any person or involve personnel matters. If particular information cannot be provided, the City will explain, in writing, the reason within 15 days. The City may charge a reasonable amount to cover any costs of reproduction.

The City will make available to the public, residents, public agencies, and other interested parties any HUD-provided data and other supplemental information the City plans to incorporate into its AFH at the start of the public participation process (or as soon as feasible after).

All written comments relative to the CDBG, HOME and LBPHC Programs are to be answered within 15 working days.

PUBLIC HEARINGS AND MEETINGS

Public hearings are required by law in order to obtain the public's views and to provide the public with the City's responses to public questions and proposals. As stated earlier, the entity responsible for conducting public hearings for the City of Brockton is the Brockton Redevelopment

Authority. As required by law, the Brockton Redevelopment Authority holds at least two public hearings each year to solicit input on housing and community needs, to review proposed uses of funds and to assess how funds were spent during the previous program year.

The two public hearings are:

- Proposed Annual Action Plan public hearing (generally held in April)
- Annual performance public hearing for the proposed CAPER (generally held in August)

During the development of the Consolidated Plan and the Analysis of Impediments to Fair Housing Choice additional public hearings will be held.

The public hearings for the Consolidated Plan will cover:

- Proposed Citizen Participation Plan public hearing, where staff present proposed revisions to the existing Citizen Participation Plan;
- Needs Assessment public hearing for the Consolidated Plan, where staff describe the housing and community development needs that were identified through data analysis and community participation;
- Proposed Consolidated Plan public hearing, where staff reviews the content of the draft Consolidated Plan, including the amount of financial assistance the City expects to receive, the proposed projects that will be undertaken and the activities that will benefit low- and moderate-income persons.

The public hearing for the Analysis of Fair Housing to Fair Housing Choice will cover:

- Disparities in housing opportunity that were identified through data analysis and community participation.
- Content, goals and strategies of the draft Analysis of Impediments to Fair Housing Choice.

In addition to the public hearings listed above, the Planning and Development Board will conduct a public hearing whenever a substantial change is proposed to the use of CDBG, HOME or LBPHC Program funds from that which was listed in the Consolidated Plan or Annual Action Plan.

A substantial Amendment is defined, in accordance with 24 CFR 91.505(a), as:

- A substantial change in allocation priorities (any change greater than 30 percent in an individual project's total budget) or a substantial change in the method of distribution of funds;
- A new activity (including those funded exclusively with program income) not previously covered by the Brockton Consolidated Plan or Annual Action Plan; or a
- Substantial change in the purpose, scope, location or beneficiaries of an activity.

All notices of public hearing(s) are published at least seven (7) days prior to the hearings and no more than 14 days in the legal section of The Brockton Enterprise. Public hearing(s) are held in the City Hall, GAR room, located at 45 School Street, or at another location that is handicap accessible.

Persons with speech, hearing or sight disabilities and persons requiring translation services will be accommodated to the greatest extent possible provided a request for such assistance is made at a reasonable time prior to the hearing to the Brockton Redevelopment Authority. Any comments or views of residents received in writing or orally at public hearings will be considered. A summary of these comments or views and a summary of any comments or views not accepted and the reasons why, shall be attached to the Plan.

CONSOLIDATED PLAN DEVELOPMENT OF STATEMENTS

A public hearing will be held to obtain views and for accepting comments on community development needs and proposals which will be reviewed by Brockton Redevelopment Authority in the preparation of the Proposed Consolidated Plan. Prior to the submission to the U.S. Department of Housing and Urban Development, a summary of the Proposed Consolidated Plan will be published in the Brockton enterprise that describes the content and purpose of the consolidated plan, as applicable, as well as a list of locations where copies of the entire proposed document may be examined in order to provide affected residents the opportunity to examine and to submit written comments on its contents. The BRA will make available to residents, 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.

To further facilitate citizen participation by low- and moderate-income people, public agencies and other interested parties, all prepared statements, proposals and comments will be accepted at the public hearings. Additionally, prepared statements, proposals and comments will be accepted at the Office of the Brockton Redevelopment Authority, 50 School Street, between the hours of 9:00 AM to 4:00 PM. At the public hearings, all comments and statements given by interested residents shall be documented and reviewed by the Brockton Redevelopment Authority for their possible inclusion in the Proposed Consolidated Plan prior to submission to the U.S. Department of Housing and Urban Development.

The Proposed Consolidated Plan includes a listing of community development objectives proposed to be pursued in the forthcoming program year; and describes the activities proposed to be undertaken with CDBG and HOME funds, including location, to allow residents to determine the extent to which they may be affected. The City of Brockton follows the Residential Anti-displacement and Relocation Assistance Plan, which established policies towards providing assistance for displacement caused by CDBG and HOME Program activities.

Residents are encouraged to review the Proposed Consolidated Plan and to submit written comments on its contents with the assurance that comments received will be considered in the preparation of the City's Proposed Consolidated Plan which is filed by the Mayor with the U.S. Department of Housing and Urban Development (HUD). The City's Citizen Participation Plan provides up to 30 days to receive comments from residents or units of general local government on

the plan, amendments or reports that are being submitted to HUD. A summary of these comments and views and a reason why any of them were accepted or rejected will be attached to the final Consolidated Plan.

Attached to and made part of the City's Citizen Participation Plan is a copy of 24 CFR, Part 91.105, Citizen Participation Plan. The attached HUD Regulations will be made available to interested residents to review during their review of the City's Citizen Participation Plan. Additionally, the Citizen Participation Plan will be amended, as applicable, by regulatory changes by HUD to 24 CFR, Part 91, et al.

REVISIONS TO THE PROPOSED AFH

In the event that the City of Brockton amends or substantially changes its AFH, the provisions at 24 CFR 5.164 will be utilized. Revision to the AFH would be required if a material change in circumstances in the City 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 the AFH no longer reflect actual circumstances;

Prior to submission of the plan change(s) to HUD, the amendment will be made available for public review and comment. The proposed changes will be placed on the Brockton Redevelopment Authority's website and will request comments from residents or units of general local government on the proposed plan change(s). The City of Brockton will consider the comments received within 30 calendar days and will make the amendment available to the public at the time it is submitted to HUD for approval. All amendments to the AFH must be approved, in writing, by the Chief Executive Officer of the City of Brockton.

TECHNICAL ASSISTANCE

Technical assistance is available through the Brockton Redevelopment Authority to groups representative of persons of low-and-moderate income that request such assistance to comment on the AFH, or in developing proposals for funding assistance under any of the programs covered by the consolidated plan.

USE OF THE CITIZEN PARTICIPATION PLAN

The City of Brockton will be required to adhere to this Citizen Participation Plan, once adopted, as the official mechanism for obtaining citizen input into the Consolidated Plan process and during the administration of the programs covered by this Plan.

JURISDICTION RESPONSIBILITY

The requirements for citizen participation shall not restrict the responsibility or authority of the jurisdiction for the development and execution of its Consolidated Plan. The sole and final responsibility and authority to make determinations regarding the City's CDBG, HOME and LBPHC funding rests exclusively with the Mayor.

ANTI-DISPLACEMENT AND RELOCATION PLAN
(attached to the Citizen Participation Plan)

Permanent Relocation

It is the policy of the City of Brockton Community Development Block Grant (CDBG) and HOME Investment Partnerships (HOME) programs and Lead-Based Paint Hazard Control Program to take all reasonable steps to minimize displacement as a result of CDBG-, HOME-, and LBPHC-assisted projects, including:

- Considering whether displacement will occur during feasibility determinations
- Identifying potential relocation workload and resources early
- Assuring, whenever possible, that residential occupants of buildings rehabilitated are offered an opportunity to return
- Planning rehabilitation projects to include “staging” where this would eliminate temporary displacement
- Following notification procedures carefully so that families do not leave because they are not informed about planned projects or their rights

When a project does require relocation, in order to ensure the timely issuance of information notices to displaced households, etc., staff of the Brockton Redevelopment Authority will ensure that all notices are sent in compliance with the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (URA).

Temporary Relocation

Temporary relocation often occurs as the result of lead abatement and other rehabilitation activities in renter- and owner-occupied units. Although the City of Brockton and Brockton Redevelopment Authority is not required to, in most cases it pays for the temporary relocation of displaced renters and/or homeowners whose residences are being rehabilitated.

