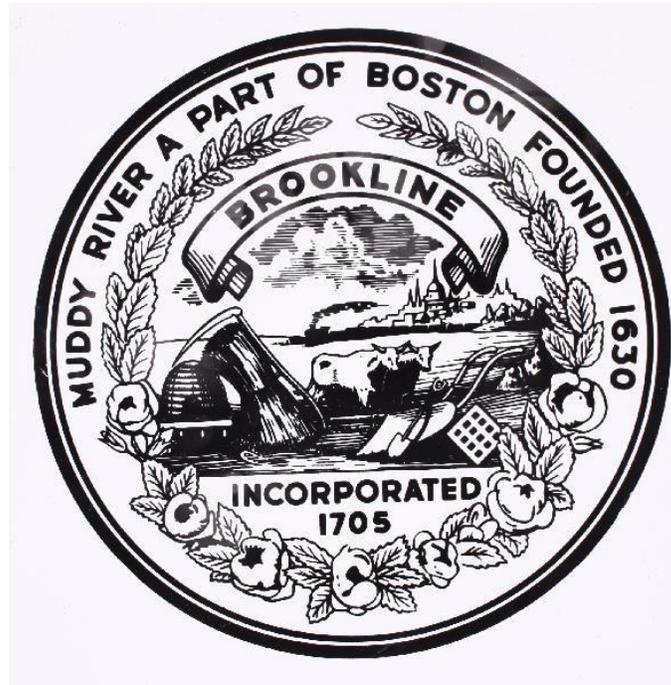


Town of Brookline

*Citizen Participation Plan
for
HUD-Administered Programs*



Department of Planning and Community Development
333 Washington Street, 3rd fl.
Brookline, MA 02445

TOWN OF BROOKLINE, MA
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Introduction:

The Town of Brookline receives an annual allocation of Community Development Block Grant (CDBG) and HOME Investment Partnerships Program (HOME) entitlement funds from the U.S. Department of Housing and Urban Development (HUD). These grant funds are administered through the Town's Planning and Community Development Department and through the WestMetro HOME Consortium for the purposes of providing decent, safe and sanitary housing; a suitable living environment, and: expanded economic opportunities for low- and moderate-income residents.

As a recipient of these entitlement program funds, HUD requires the Town to produce the following documents:

1. Five-Year Consolidated Plan and Strategy (Con Plan): A five-year plan that documents Brookline's housing and community development needs, strategies to address those needs, and proposed program goals.
2. Annual Action Plan: An annual plan that describes the specific CDBG and HOME-funded projects that will be undertaken over the course of the upcoming fiscal year.
3. Consolidated Annual Performance and Evaluation Report (CAPER): An annual report that evaluates the Town's success in utilizing CDBG and HOME funds.

I. Citizen Participation

Pursuant to the requirements of 24 CFR 91.105, and in an effort to strengthen public and private partnerships, the Town of Brookline has created this Citizen Participation Plan to assist in developing a unified vision for community development actions and to develop applications for federal funding for its formula grant programs (CDBG and HOME) that have received meaningful input and direction from the community. This plan outlines how the Town will provide citizens, particularly those with low- and moderate-income, minorities, non-English speaking residents and other interested parties, with opportunities to participate in an advisory capacity in the planning, implementation and evaluation of CDBG and HOME programs which benefit Brookline's low and moderate-income residents and the areas where the grant funds are proposed to be used. The Town will follow the steps put forth in this Citizen Participation Plan in the event that the Town proposes substantive changes for the use of federal resources or if it amends its Consolidated or Action Plans.

II. National Objectives

The primary purpose of the CDBG grant program is to assist low- to moderate-income persons through achievement of the following goals:

1. Provide decent, safe, and sanitary housing

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2. Provide a suitable living environment
3. Expand economic opportunities

Furthermore, under HUD regulations, each activity to be funded must meet one of the above objectives if it does one (or more) of the following:

- Benefits low- or moderate-income residents (defined as individuals, families, or households whose incomes do not exceed 80 percent of the area median income (AMI) for the statistical area, while very low-income families are defined as families whose incomes do not exceed 50 percent of AMI for the statistical area.)
- Eliminates or reduces slum or blight
- Meets an “urgent need” (damage caused by a flood or hurricane, etc.)

III. Administration

CDBG-funded programs are administered by the Town of Brookline’s Planning and Community Development Department. The Town of Brookline is also a member of the WestMetro HOME Consortium, whose staff at Newton City Hall administer HOME funds for all Consortium partners. Throughout each step of the CDBG funding process, the Planning Department will be responsible for notifying agencies, organizations and the public regarding the availability of CDBG funding and assisting the Town’s CDBG Advisory Committee, Housing Advisory Board and Select Board with funding recommendations. The Planning Department, through the Brookline Select Board, will execute subrecipient agreements with grantees, including other Town Departments, to ensure that recipients adhere to programmatic responsibilities including, but not limited to, the following:

- Financial management and procurement requirements for CDBG and HOME projects
- Implementation of cross cutting CDBG and HOME program requirements, such as environmental review and labor standards
- Timely submission of accurate requisitions and reimbursement requests
- Preparation for audits and performance monitoring of subrecipient projects, particularly public services
- Maintenance of records in preparation for action plans and quarterly/yearly reporting, as required by HUD

IV. Development of the Consolidated Plan

As noted, HUD regulations 24 CFR 91.205 to 91.230 require recipients of CDBG and HOME funding to prepare a Five-Year Consolidated Planning Strategy (Consolidated Plan). The Town’s Consolidated Plan is created to identify and prioritize The Town’s housing and community development needs, while the WestMetro Consortium’s Consolidated plan prioritizes housing preservation and development priorities of Consortium members. In particular, the Town’s CDBG Consolidated plan assists Town leaders as they consider specific funding requests and make recommendations for the use of funds over the course of the five year period. The Town’s Community Planning staff will solicit public input for the development of the CDBG and

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HOME Consolidated Plans in order to ensure that the public understands the programming process for federal funds and has a hand in prioritizing the needs of the community. The consolidated planning process is completed in several stages including data collection, drafting of narrative, soliciting public comment and review, and, finally, local adoption and submission to HUD.

A number of methods may be employed to gather input from the community, including residents (particularly public housing authority residents), non-profit organizations and agencies, and members of the business community. Methods could include surveys, focus groups, direct consultation with individuals and other means of community outreach, such as participation in Brookline Town Day or other community events.

The Town will conduct two public hearings over the course of the program year and will encourage the participation of interested parties prior to the development of the Annual Action and Consolidated Plans. In an effort to maximize participation, particularly for low- to moderate-income residents, meetings will be held in the evening at locations that are easily accessible. At the public hearings, Town staff or elected officials will solicit feedback on housing and community development needs and also review:

- The amount of actual or projected assistance to be received from HUD for the program year;
- Activities that may be undertaken using these funds and the estimated benefit to persons of low- and moderate-income;
- The areas in the Town where activities may be undertaken;
- A description of the projects, programs and services that are currently underway and utilizing federal funds.

V. Consolidated Annual Performance Evaluation Report (CAPER)

Pursuant with 24 CFR 91.105(a)(2)(i) the Town of Brookline will, prior to submitting any Consolidated Annual Evaluation Report (CAPER) to HUD, make available to interested parties a draft of the CAPER in order to provide for and encourage citizens to review, assess and comment on the findings of the performance report. Community Planning Staff will provide a reasonable opportunity for parties to examine and comment on the draft through the following actions:

- The Town will publish a legal notice in a local daily newspaper of general circulation, such as the **Brookline TAB**, summarizing the contents and purpose of the CAPER and include a list of the locations where copies of the entire draft may be examined. The notice will also specify the deadline and place to which written comments, either by e-mail or otherwise, may be submitted.
- The Town will allow for a minimum of a 30 day period for comments to be received.
- A draft of the CAPER report will be posted on the Town website in a format that is available for citizens to examine and download.

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VI. Public Hearing Process

1. Frequency

The Town will hold a minimum of two public hearings annually, at different times during the Annual or Consolidated planning process, to obtain citizen input on proposed programs and projects. Other public meetings may coincide with development of the Consolidated Plan, Annual Action Plan, and CAPER. It is anticipated that the draft Consolidated Plan or Action Plan will be available for public review on or about the second week of April of each year and the plan(s) shall be adopted and submitted to HUD no later than the 15th of May of each year. It is anticipated that the draft performance report (CAPER) will be issued on or before the 15th of September of each year and the report shall be submitted to HUD no later than the 30th of September of each year.

2. Location

Hearings will be held in Town Hall or other buildings accessible to the public. Meetings will be scheduled on a weekday evening in a room that can accommodate the needs of persons with disabilities.

3. Outreach

Notification of Public Hearings will be given in accordance with HUD regulations and the Massachusetts Open Meeting Law, Chapter 30A: Section 11A/2. Public hearing notices will be published two weeks prior to the date of the hearing and direct notification will be sent to non-profit organizations, citizen advisory committee members, minority and non-English speaking citizen groups, groups representing people with special needs, and other interested parties, as applicable and appropriate. The Brookline Public Housing Authority and other groups providing housing to low-income persons will be encouraged to post notices in their buildings. Additionally, meeting notices will be published on the Town website and on social media channels.

4. Accessibility

All hearings/meetings will be held in handicap accessible locations. Town policy requires that meeting notices include contact information for groups or individuals seeking to arrange for special accessibility requirements. Persons needing auxiliary aids for effective communication in Town programs or activities may make their needs known by contacting the Town's ADA Compliance Officer:

ADA Compliance Officer
Office of Diversity, Inclusion and Community Relations
11 Pierce Street
Brookline, MA 02445

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Ph: 617-730-2326
TTY: 617-730-2327
Fax: 617-730-2388
skaplan@brooklinema.gov

5. Information Provided

As noted, Public Hearings will, as applicable, address housing and community development needs and development of proposed activities. Generally, public hearings will provide the following information:

- The amount of assistance received from HUD;
- Proposed activities that may be undertaken using these funds, including the estimated funding amount by activity and the percentage of low- and moderate-income persons who will benefit;
- The areas of the Town where activities are proposed to be undertaken;
- A description of the projects programs and services that are underway and currently utilizing federal funds
- Review of program performance by past funding recipients, particularly those seeking additional funding.

VII. Amendment Policy

The following criteria will require that the Town seek public input, particularly from the low- and moderate-income community, in accordance with 24 CFR 91.105:

- A change in its allocation priorities or a change in the method of distribution of funds
- To carry out an activity using funds from any program covered by the consolidated plan not previously described in the action plan.
- To change the purpose, scope, location, or beneficiaries of an activity. (Any of these factors will be considered a substantial amendment and will be required to go through a formal amendment process).
- Notwithstanding the foregoing, minor budgetary revisions to the activities in the Consolidated or Annual Plans, defined as changes that do not exceed 25 percent of the original budget amount, will not constitute a substantial amendment and will be made without a public hearing or notification.

With regard to the above, the Brookline Select Board will hold a public hearing on a substantial amendment, and will provide notification of the proposed amendment not less than 30 calendar days prior to the public hearing. The public hearing will follow the protocols and procedures detailed in Section VI of this Citizen participation Plan. The notice will summarize the nature of the proposed amendment, the date, time and location of the public hearing, and procedures for submission of comments.

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As per Section VI., the Town may make this notification by publishing a notice in a newspaper of general circulation, along with notification sent to agencies or organizations affected by the amendment. The notice will also be posted on the Town's website and via social media channels. Within five business days after the public hearing, the Town will determine whether to adopt the proposed amendment, adopt a revised version of the amendment or reject the amendment. The determination will be posted on the Town's website. If the amendment is adopted, the change will be incorporated into the Consolidated Plan, along with a summary of comments on the amendment and the Town's response to such comments.

VIII. Citizen Comment on the Consolidated Plan / Amendments, and Performance Reports

1. Notification.

In Accordance with 24 CFR 91.105(a)(3) and in keeping with section VI. above, the Town will publish notification of the availability of the proposed Consolidated Plan, Consolidated Annual Performance Evaluation Report (CAPER), and any substantial amendments in a newspaper of general circulation and on the Town website giving citizens not less than 30 days for the Consolidated Plan and amendments and not less than 15 days for the Performance Report (CAPER) to comment. This notice will include:

- The date on which the plan will be available and the date by which comments must be received;
- The name of the person and/or agency where comments should be directed (Comments should be directed to the Planning and Community Development Department);
- The form that comments should take (written, email, fax etc.).

2. Location.

The Town will make the plan available at the following locations for a period of not less than 30 days so that citizens may comment on the plan:

- All branches of the public library;
- Planning and Community Development Department;
- By email or parcel post as requested; and,
- On the Town website at www.brooklinema.gov. (Persons who are visually impaired may contact the Office of Diversity, Inclusion and Community Relations to arrange for special accommodations – per section VI(4));
- In addition to the documents being available online or at one of the sites listed above, local citizens may also request a copy from the Planning and Community Development Department. Copies will be made available to the public free of charge.

3. Consideration of Comments.

All comments or views of Citizens received in writing, or orally at the public hearings will be considered in preparing final plans.

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IX. Availability to Access Public Records

The Town of Brookline will publish the entire final Consolidated Plan, related amendments, Annual Action Plans and performance report (CAPER). The Town of Brookline will also publish and make available this Citizen Participation Plan. These documents will be made available to the public at the following locations and by the following means:

- All branches of the public library;
- Planning and Community Development Department;
- By email or parcel post as requested; and,
- On the Town website at www.brooklinema.gov

A reasonable number of copies will be made available free of charge. These documents will also be made available in a format accessible to persons with disabilities upon request (e.g. providing oral, Braille, electronic, or large print copies for the visually impaired and delivering copies to the homeward bound).

X. Technical Assistance

Community Planning Staff will be available during business hours to answer questions and provide technical assistance to citizens, public agencies and other interested parties in developing proposals for funding under any of the programs covered by the Consolidated or Annual Action Plans. Prospective applicants will be encouraged to contact Community Planning staff prior to the submission of application materials to ensure that the proposal meets program eligibility requirements.

XII. Citizen Complaint Process

Community Planning staff will be responsible for responding to complaints from citizens regarding the Consolidated or Annual Action Plans, any related amendments, the performance report (CAPER), and the citizen participation plan. Complaints may be submitted in writing to the Planning Department by mail, or in-person. When submitting a complaint, citizens shall provide a description of the specific activity and/or project, information on the organization responsible for carrying out the activity and/or project, and a statement of the grievance. Complaints must be mailed or hand delivered to:

Brookline Town Hall
Planning and Community Development Department
333 Washington Street, 3rd Floor
Brookline, MA 02445
Attn: Assistant Director for Community Planning

Staff will review complaints and provide a written response within 15 business days.