



TOWN OF BROOKLINE, MA

DEPARTMENT OF PLANNING AND COMMUNITY DEVELOPMENT

CITIZEN PARTICIPATION PLAN (CPP)

Adopted: DATE

INTRODUCTION AND PURPOSE

The purpose of the Citizen Participation Plan is to outline the Town of Brookline's process by which its citizens - especially those that are low to moderate income, minorities, and non-English speaking - are encouraged to participate and provide input in an advisory capacity in the planning, implementation and evaluation of the Community Planning and Development program funding from the U.S. Department of Housing and Urban Development (HUD) for which the Town of Brookline is entitled.

The Town of Brookline receives funding from HUD for the Community Development Block Program (CDBG) and the Home Investment Partnerships Program (HOME). These programs assist with the Town's housing, economic, and community development needs. The programs are described as followed:

- 1. Community Development Block Grant Program (CDBG):** Title I of the Housing and Community Development Act of 1974 (PL 93-383) created the CDBG program. This is one of the longest-running programs of the U.S. Department of Housing and Urban Development (HUD). CDBG provides funds to address critical needs such as quality affordable housing, public facilities, infrastructure, job creation and public services that serve a majority of low-moderate income residents and families. Born from community input and support, CDBG provides freedom to communities to make local choices and decisions on how to best implement these funds.
- 2. Home Investment Partnerships Program (HOME):** The HOME program was introduced in the Cranston-Gonzalez National Affordable Housing Act of 1990 and provides funding for housing rehabilitation, new housing construction, acquisition of affordable housing, and tenant-based rental assistance.

The programs are administered by the Town of Brookline's Planning and Community Development Department. The Town of Brookline is also part of the WestMetro HOME Consortium. Throughout each step of the process to implement these programs, the Planning and Community Development Department is responsible for notifying agencies, organizations and the general public regarding funding availability, and assisting the Town's CDBG Committee, Housing Advisory Board and the Town Select Board with funding

recommendations. The Planning and Community Development Department also executes agreements with sub-recipients and other Town departments in order to articulate specific program responsibilities including:

- Oversight of the procurement process for design and construction work
- Review and approval of reimbursement requests
- Performance monitoring of sub-recipient projects
- Preparation of plans and reports as required by HUD

PLANNING ACTIVITIES SUBJECT TO CITIZEN PARTICIPATION PLAN

ACTIVITY 1: FIVE YEAR CONSOLIDATED PLAN

HUD regulations 24 CFR 91.205 to 91.230 require recipients of CDBG funding to prepare a Five-Year Consolidated Planning Strategy (Consolidated Plan). The Consolidated Plan identifies and prioritizes community development needs, project proposals, and the specific funding needs of programs. Citizen Participation is essential to the Five Year Consolidated Plan which includes a collaborative process to help identify a unified vision for the Town of Brookline's community development actions. Engaging and consulting with a variety of stakeholders past and future anticipated, residents, neighboring communities, local agencies, holding public hearings, conducting citizen surveys, and providing opportunities to provide written comment are all part of the strategy to obtain citizen input. The Town will also make special efforts to reach low to moderate income residents who reside in CDBG-Priority areas and the Brookline Housing Authority. The steps for public participation relative to the Five-Year Consolidated Plan are comprised of the following:

A. Consultations with Other Community Institutions

The Town of Brookline will consult with other public or private agencies, faith-based agencies, businesses, developers, and both for-profit and non-profits that either provide or have direct impact on the broad range of housing, economic, health, and social services that are needed by low to moderate income Brookline residents. These may take place through meetings, focus groups or committees, or other means with which to coordinate information and facilitate communication. The purpose of these meetings is to gather information and data on the community and economic development needs of the Town.

B. Citizen Surveys

The Town shall conduct surveys of Brookline residents in order to gather additional information on community priorities.

C. Public Hearings

There will be a minimum of two public hearings to provide citizens of the Town an opportunity to share their comments on the community's needs. One of the hearings will be held before the Proposed Consolidated Plan is published for comment. There will be special outreach to those that are low to moderate income in Brookline,

especially those that reside in the Brookline Housing Authority. The Town will seek specific input to identify the needs of differing cohorts including those experiencing homelessness, persons living with HIV/Aids and their families, persons with disabilities and those with other special needs. Also, there will be outreach to local organizations, both for-profit and non-profit, that provide services to these citizens. The citizen input during these hearings will directly shape the needs and priorities to be addressed by the spending plan in the Consolidated Plan for the program year beginning July 1st of that year.

All public hearings will be advertised no later than two weeks prior to the hearing date. All public hearing notices will also be posted on the Town of Brookline's website <https://www.brooklinema.gov/>. The Town will consider any comments or views of citizens received in writing or orally at a public hearing. Each hearing will be held in the evening at facilities which are handicapped accessible. All locations will be convenient to potential and actual beneficiaries, and will accommodate persons with disabilities. Each public hearing notice must include the availability of an interpreter if a significant number of non-English speaking or hearing-impaired persons are expected to participate at the hearing. It will be the responsibility of the residents to notify the Town if they require assisting services. Each public hearing notice indicates the Town's policy to provide auxiliary aids for effective communication in the Town's programs or activities, the availability of assistive listening devices, and communication services. These notices will provide the most up-to-date contact for the Town to receive these services.

D. Written Comments

Based on public input and data analysis, the Town of Brookline Department of Planning and Community Development will prepare a draft Consolidated Plan. There will be a period of 30 calendar days to receive written comments on this plan. The Plan will be available for review at the main branch of the Brookline Public Library and the Department of Planning and Community Development office at Town Hall. Notification of availability of the draft will appear in a local newspaper of general circulation.

E. Social Media

The Town of Brookline Department of Planning and Community Development will utilize social media available, in addition to the newspaper and webpage to solicit public comment.

F. Final Action on the Consolidated Plan

All written or oral testimony provided will be considered in preparing the final Consolidated Plan. A summary of testimony received and the Town's reasons for accepting or not accepting the comments must be included in the final document. The Town will consider these comments before taking final action on the Consolidated Plan. When the plan is approved by the Town Select Board, the final Consolidated Plan will be

posted in the main branch of the Brookline Public Library and the Town of Brookline Department of Planning and Community Development's office.

**ACTIVITY 2: CONSOLIDATED ANNUAL PERFORMANCE EVALUATION REPORT (CAPER)
(SUMMARY)**

As required by HUD, at the end of each program year, a Comprehensive Annual Performance and Evaluation Report (CAPER) must be submitted to HUD by September 30th. The CAPER gives and actual account of activities that occurred during the previous program year along with information as to how the Town maintained and expended funds outlined in the annual Action Plan for that program year. The CAPER preparation and submittal process includes:

- A. The Department of Planning and Community Development staff prepares the draft CAPER
- B. Reasonable notice is provided to the public both in the newspaper and through the Town website for the draft CAPER to be available for 15 days for written public comment. The draft CAPER will be available at the office of the Department of Planning and Community Development and the Brookline Public Library.
- C. Once the 15-day public comment is period is done, the CAPER and written comments will be submitted to HUD.

ACTIVITY 3: SUBSTANTIAL AMENDMENTS TO THE CONSOLIDATED and/or ACTION PLANS

The federal Consolidated Plan regulations require the inclusion of specific criteria in the Citizen Participation Plan for determining what constitutes a change in programmatic activity significant enough to be classified as a "Substantial Amendment" to the Consolidated Plan or Action Plan. A change in federal rules or regulations that mandates an alteration in current programmatic operation would not be considered a substantive amendment, but rather a conforming regulatory requirement. Changes deemed "Substantial Amendments" must be subjected to citizen review and comment before implementation.

- A. The following criteria are used to determine whether a programmatic change constitutes a Substantial Amendment to the Consolidated Plan and/ or Action Plan.
 - a. A change which results in a major alteration of the purpose, location, or beneficiaries of an activity; or
 - b. A change in the allocation priorities of program funds greater than 40 percent in an individual project budget or a change in the method and distribution of funds; or
 - c. A change in the use of CDBG funds from one eligible activity to another or
 - d. To carry out an activity using funds from any program covered by the consolidated plan not previously described in the action plan.

- B. Prior to the adoption of any substantial amendment to the Town’s Consolidated Plan, the Town shall publish in the Brookline TAB, a “Notice of Substantial Amendment to the Consolidated Plan and/or Action Plan”, which will identify the activities involved and the nature of the substantial amendment to be implanted. The notice will advise citizens that they have a period of thirty days to seek additional information or to comment on the change.

ACTIVITY 4: AMENDMENTS TO THE CITIZEN PARTICIPATION PLAN

In the events that changes to the Citizen Participation Plan are necessary, The Department of Planning and Community Development staff shall draft them and proceed with an amendment/s to the Citizen Participation Plan in the following way:

- A. Reasonable notice is provided to the public both in the newspaper and through the Town website for comments on the original and amended Citizen Participation Plan. There shall be a period of 15 days for written public comment. The original and amended Citizen Participation Plans will be available at the office of the Department of Planning and Community Development and the Brookline Public Library. The Department of Planning and Community Development will make the Plan available to persons with disabilities upon request.

GENERAL REQUIREMENTS

Public Hearings

The Town of Brookline will hold at least two public hearings during the program year to obtain citizens’ views and to respond to proposals and questions. These hearings must address housing and community development needs, development of proposed activities, and a review of program performance. One of the hearings will be held before the Proposed Consolidated Plan/Annual Plan is published for comment. Notifications for public hearings, at a minimum, will be given in accordance with HUD regulations and the Massachusetts Open Meeting Law, Chapter 30A: Section 11 A/2. The Department of Planning and Community Development will also perform special outreach to those that are low to moderate income in Brookline, especially those that reside in the Brookline Housing Authority. Also, there will be outreach to local organizations, both for-profit and non-profit, that provide services to these citizens. These hearings will be held in locations that are accessible to low and moderate income residents and those with disabilities. Translation services for non-English speaking residents and/or those who are hearing-impaired will be provided upon request.

Public Meetings

Public meetings of the Department of Planning and Community Development overseeing HUD programs provide opportunities for citizen participation and comment on a continuous basis. Meetings are held in locations accessible to person with disabilities. Translation services for non-English speaking residents and/or those individuals with hearing impairments are provided as necessary.

Document Access

Copies of all planning documents, including the Citizen Participation Plan, the Consolidated Plan, Action Plan, and CAPER will be available to the public upon request. Citizens will have the opportunity to review and comment on these documents in draft form prior to final adoption. These documents will be made available at the Brookline Public Library, the Town of Brookline Department of Planning and Community Development and the Town's webpage <https://www.brooklinema.gov/>. Upon request, these documents will be provided in a form accessible to persons with disabilities. Citizens, groups and other interested organizations may obtain copies of the written reports by calling the Department of Planning and Community Development at (617)-730-2130.

Technical Assistance

The Town of Brookline's Department of Planning and Community Development 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 Plan. CDBG applicants are encouraged to contact the Town of Brookline Department of Planning and Community Development prior to submission of application materials to ensure that the proposal meets program eligibility requirements.

Plans to Minimize Displacement

The Town of Brookline will take all necessary 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 Town's Citizen Participation Plan. In the event that involuntary displacement must occur due to an emergency, The Town of Brookline 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 anti-displacement and relocations 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.

Notification to Public Housing Authority

The Town of Brookline will provide information on a regular basis to the Brookline Housing Authority about consolidated plan activities related to its development and surrounding communities so that the housing authority can:

- Make this information available at the annual public hearing required under the Comprehensive Grant Program
- Encourage participation among residents in the process of developing and implementing the Consolidated Plan.

Citizen Complaint Process

The Town of Brookline Department of Planning and Community Development will be responsible for complaints from citizens regarding the Consolidated Plan, any related amendments, the Performance report (CAPER), and the citizen participation plan. Complaints may be submitted in writing to the Department of Planning and Community Development by mail, or in person. When submitting a complaint, citizens shall provide a description of the specific activity and/or project, and a statement of the grievance. Complaints must be mailed or hand-delivered to:

Town of Brookline
Department of Planning and Community Development
333 Washington St.
Brookline, MA 02445

The Department of Planning and Community Development will review complaints and provide a written response within 15 business days.

TEMPORARY CHANGES TO REQUIREMENTS FOR COVID-19 RESPONSE

To address urgent needs arising as a result of the COVID-19 pandemic, HUD allowed waivers for citizen participation. Through the Coronavirus Aid, Relief, and Economic Security Act (CARES Act) of March 27 2020, the waivers allow for an expedited process to draft, propose, or amend annual or consolidated plans. Expedited procedures must include notice and reasonable opportunity to comment of no less than five days. The five day period can run concurrently for comments on the action plan amendment and amended citizen participation plans.

In-person public hearings are not required. Grantees may meet public hearing requirements with virtual public hearings if:

- national/local health authorities recommend social distancing and limiting public gatherings for public health reasons; and
- Virtual hearings provide reasonable notification and access for citizens in accordance with the grantee’s certifications; and
- there are timely responses from local officials to all citizen questions and issues, and citizens have access to all questions and responses.

CDBG FY 19 and FY 20 Grants
CDBG Grants before FY 19

Immediately Available
Not Available

In addition to temporary changes to citizen participation requirements, the CARES Act allows for changes to funding allocations. The Town will adopt these changes through substantial amendments to the FY2020 (FFY2019) Annual Action Plan (AAP).

As the Town completes its FY2021 (FFY2020) AAP, its FYS 2021-2025 (FFYS 2020-2024) Consolidated Plan and its CAPER reporting in September 2020, the Town will:

- Hold an expedited five day public comment period for the substantial amendments, Annual Plan and the CAPER
- Exceed the 15 percent cap on public services normally required by the CDBG program
- Hold virtual public meetings of the CDBG Advisory Committee to review proposals and deliberate over funding recommendations.

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