

COMMUNITY DEVELOPMENT BLOCK GRANT (CDBG) PROGRAM
CITIZEN PARTICIPATION PLAN

FOR
COUNTY OF ERIE
AND
COUNTY OF ERIE "ON BEHALF OF"
EDINBORO BOROUGH
GIRARD TOWNSHIP
MCKEAN TOWNSHIP
NORTH EAST BOROUGH

Administered by
Erie County Department of Planning
Erie County Courthouse
140 West 6th Street
Erie, PA 16501

PUBLIC COMMENT PERIOD
March 25 to April 25, 2014

Adopted by Erie County Council on _____

**COMMUNITY DEVELOPMENT BLOCK GRANT (CDBG) PROGRAM
CITIZEN PARTICIPATION PLAN**

TABLE OF CONTENTS

SECTION 1	BACKGROUND INFORMATION
SECTION 2	POLICY STATEMENT
SECTION 3	SCOPE OF PARTICIPATION
SECTION 4	CONTACT AGENCY/PERSON
SECTION 5	TECHNICAL ASSISTANCE
SECTION 6	PUBLIC HEARINGS/ LOCATIONS/ ACCESSIBILITY/ PUBLIC NOTICES
SECTION 7	NOTIFICATION OF NON-ENTITLEMENT MUNICIPALITIES/ PRIORITIZATION OF COUNTY PROJECTS- PROJECT PRIORITIZATION MEETING
SECTION 8	PROGRAM INFORMATION
SECTION 9	PROCEDURES FOR COMMENTS, OBJECTIONS AND COMPLAINTS
SECTION 10	MODIFICATION TO COUNTY AND COUNTY "OBO" CDBG PROGRAM
SECTION 11	MODIFICATION TO CITIZEN PARTICIPATION PLAN
SECTION 12	NO RESTRICTON OF AUTHORITY PROVISION

CITIZEN PARTICIPATION PLAN
COUNTY OF ERIE *and* COUNTY OF ERIE “OBO”
COMMUNITY DEVELOPMENT BLOCK GRANT (CDBG) PROGRAM

SECTION 1 - BACKGROUND INFORMATION

In 1984 the Commonwealth of Pennsylvania enacted Act 179 establishing the State Community Development Block Grant (CDBG) program the purpose of which was to provide certain counties and municipalities with an annual allocation of grant funding to help develop viable communities through the provision of decent housing, a suitable living environment, and expanded economic opportunities for persons primarily of low-to-moderate income. The Commonwealth receives its CDBG funds from the U.S. Department of Housing and Urban Development (HUD) pursuant to Title I of the Housing and Community Development Act of 1974, as amended.

The Commonwealth’s CDBG program is administered by the PA Department of Community and Economic Development (DCED) and the funds are distributed according to the following state formula:

- 38% to *eligible counties*
- 38% to *eligible boroughs, incorporated towns and townships*
- 24% to eligible cities
- 13% for discretionary (competitive) projects
- 2% for state administrative costs

Erie County is one of fifty (50) *eligible counties* in the state entitled to receive an annual allocation of CDBG funds. The County’s funds are to be used to benefit the “non-entitlement municipalities” within its jurisdiction. Of the thirty-eight (38) municipalities in the County, twenty-nine (29) are considered “non-entitlement” which means they are not eligible to receive an annual allocation of CDBG monies from either the State or HUD and therefore can apply for a share of the County’s CDBG funds. (*See Exhibit 1 and map*).

There are seven (7) *eligible* municipalities in Erie County which are entitled to receive an annual allocation of CDBG funds. These include: 1) Edinboro Borough, 2) North East Borough, 3) Conneaut Township, 4) Girard Township, 5) McKean Township, 6) Washington Township, and the 7) City of Corry. These communities have obtained entitlement status as a result having a population of 4,000 or more according to the latest Decennial Census and meeting the minimum standards of physical and economic distress.

The County, acting through the Erie County Department of Planning, has been designated as the local entity responsible for the administration of the County’s CDBG program and the CDBG programs of the following entitlement municipalities: Edinboro Borough, North East Borough, Girard Township, and McKean Township. These four municipalities are referred to as “On Behalf Of” municipalities or “OBO”s’.

As of FY 2012, the Townships of Conneaut and Washington have elected not to participate in the State CDBG program and have declined their grant funds. The “opting-out” period is for three years after which time these municipalities will have the opportunity to rejoin the program and request their funding allocation.

The City of Corry administers its own CDBG program. Millcreek Township and the City of Erie are direct HUD entitlement municipalities. The City of Erie administers its own program while Millcreek Township’s CDBG program is administered by Erie County Planning under a separate contract with Township.

SECTION 2 - POLICY STATEMENT

It is the public policy of the County of Erie to provide for and encourage citizen participation in the planning, implementation and assessment of the County's CDBG program and the CDBG programs of the four (4) entitlement municipalities which it administers.

To facilitate this policy, the County has developed and adopted this "CDBG Citizen Participation Plan" which sets forth policies and procedures to maximize opportunity for citizen participation in the community development process. This Plan supersedes all other CDBG Citizen Participation Plans which may have been adopted by the County of Erie.

In undertaking its CDBG program the County strongly encourages participation by persons of low and moderate income, residents of blighted areas, and residents of areas where community development funds are utilized. Additionally, participation is strongly encouraged from minorities and persons with disabilities.

SECTION 3 - SCOPE OF PARTICIPATION

Erie County will make reasonable efforts to provide for citizen participation during the community development process and throughout the planning, implementation and assessment of all CDBG programs undertaken by the County and the "OBO's, including, but not limited to, the following phases:

- 1) Identification and assessment of housing and community development needs;
- 2) Determination of CDBG project(s) and the development of CDBG application(s);
- 3) Revisions and/or modifications to approved CDBG programs/projects; and,
- 4) Assessment of CDBG program performance.

SECTION 4 - CONTACT AGENCY/PERSON

The Erie County Department of Planning (ECDP) is responsible for the development, publication, and implementation of citizen participation of the CDBG program. The ECDP will disseminate information concerning proposed projects and status of current project activities; coordinate applicable groups participating in the community development process; receive written comments; serve as a conduit by which ideas, comments, and proposals from local residents may be transmitted to local officials; and monitor the citizen participation process and proposing such amendments to the CDBG Citizen Participation Plan as necessary.

All questions concerning the CDBG program including citizen participation in the community development process should be directed to the CDBG Administrator whose office is located at the Erie County Department of Planning, Erie County Courthouse, Room 111, 140 West 6th Street, Erie, PA 16501. The CDBG Administrator may be contacted by mail; phone: (814) 451-6016; fax: (814) 451-7000; or email: jberdis@eriecountygov.org.

SECTION 5 - TECHNICAL ASSISTANCE

The ECDP will be responsible for providing technical assistance to individual citizens and citizen groups, especially those groups representative of persons of low and moderate income, as may be required to adequately provide for citizen participation in the planning, implementation and assessment of the CDBG programs.

Technical assistance shall be provided on request and may include, but not necessarily be limited to: interpreting the CDBG program and its rules, regulations, procedures and/or requirements; providing information and/or materials concerning the CDBG program; and, assisting low and moderate income citizens, and residents of blighted neighborhoods to develop statements of views, identify their needs, and to develop activities and proposals for projects which, when implemented, will resolve those needs.

SECTION 6 - PUBLIC HEARINGS

Public hearings will be the primary means of obtaining citizen views and responding to proposals and questions related to community development and housing needs, proposed CDBG activities and past CDBG performance.

A minimum of two (2) public hearings will be held each fiscal year for each entitlement program the County administers. This includes the County's CDBG program which benefits non-entitlement communities, as well as the programs of the four (4) entitlement ("OBO") municipalities – Edinboro Borough, Girard Township, McKean Township, and North East Borough. Both hearings are held prior to the submission of the funding application to DCED. The CDBG Administrator will be responsible for conducting the public hearings.

The primary purpose of Public Hearing #1 is to assess community needs and problems in an effort to determine the most critical needs to be addressed by the CDBG program. Public Hearing #2 will identify the activities proposed to be undertaken with CDBG funds to address the needs. The time period between the hearings may be several weeks or months depending on several factors including when DCED indicates the date for submission of the application and the amount of grant funds available.

Information to be conveyed and program areas to be discussed at **Public Hearing # 1** will include:

- Purpose of hearing and background information including reason for entitlement status and the amount of CDBG funding obtained over the years.
- Amount of funds anticipated for the upcoming fiscal year.
- Anticipated date when application will be submitted to DCED.
- Range of activities which may be undertaken with CDBG funds. Also, examples of ineligible activities.
- Identify the National Objectives of the CDBG program with particular emphasis on the *primary objective of benefiting low-to-moderate (LMI) persons*. At least 70% of funds must go towards meeting this objective.
- Explanation of what is a LMI person - 80% of median income. Provide current income limits.
- Explanation of "primarily benefiting" – at least 51% LMI. Also, indicate that some groups of persons like the elderly and adults with disabilities are "presumed" by HUD to be LMI.
- How concentrations of LMI persons are determined – HUD census information or income surveys.
- Identification of the types and levels of assistance the County would make available to persons displaced by CDBG funded activities if such relocation was necessary.
- Review prior use of CDBG funds – usually previous 3 years.
- Review/revise prior Three Year CDBG Plan which assesses the jurisdiction's needs and objectives related to housing; public facilities/improvement; public services; and economic development.
- Take comment on potential projects. Discuss the need for income surveys.
- Discuss remaining schedule of events for the program/fiscal year including anticipated date of Public Hearing #2.

Information to be conveyed at **Public Hearing # 2** will include:

- Identification of the activities proposed to be undertaken with CDBG funds.
- The amount of CDBG and other funds allocated for each activity.

- The National Objective which is being met.
- In addition to identifying the proposed activity/project for the current fiscal year, identify likely activities for years 2 and 3 of the Three Year Plan.
- Solicit citizen views and comments.
- Discuss remaining schedule of events including when the governing body will pass a resolution and when the application will be submitted to DCED.

All attendees at the hearings will be asked to sign-in and provide contact information. Minutes of the hearing will be taken by the CDBG Administrator or the secretaries of the respective “OBO” municipalities and maintained in the County’s citizen participation file. Any individual unable to attend the public hearings may contact the CDBG Administrator and request a copy of any and all documents that were distributed at the hearing, including a copy of the minutes.

SECTION 6.1 - PUBLIC HEARING LOCATIONS /ACCESSIBILITY

Public Hearing #1 for the County’s CDBG program will normally be held in the Admiral Room of the Raymond M. Blasco Library, 160 East Front Street, Erie PA, 16507. This hearing will usually be conducted forty-five minutes to an hour before a regularly scheduled Erie County Planning Commission meeting which meets once a month on the second Thursday of the month.

Public Hearing #2 for the County’s CDBG program will generally be held before Erie County Council in Erie County Council Chambers, located at the Erie County Courthouse, 140 West 6th Street, Erie PA 16501. This hearing is usually conducted one hour before a regularly scheduled County Council meeting which is held twice a month on Tuesdays. Typically, at the regularly scheduled Council meeting to follow the hearing County Council will pass a Resolution approving submission of the CDBG application to DCED.

Public Hearings #1 and #2 of the “OBO” municipalities will be held at the respective municipal buildings, and will be scheduled for convenient times as determined by local officials. The locations of each are as follows:

- Edinboro Borough Municipal Building, 124 Meadville Street, Edinboro, PA 16412
- Girard Township Municipal Building, 10140 Ridge Road, Girard, PA 16417
- McKean Township Municipal Building, 9231 Edinboro Road, McKean, PA 16426
- North East Borough Municipal Building, 31 West Main Street, North East, PA 16428

All facilities noted above are accessible to persons with disabilities. If hearing-impaired or non-English speaking residents request assistance to participate in a public hearing, the ECDP and “OBO” local officials will seek to retain appropriate interpreter services to allow such residents to participate. The ECDP and “OBO” local officials will consider it mandatory only in instances where it is expected that a significant number of hearing impaired or non-English speaking residents will be in attendance. Persons needing special accommodations or translators should make their requests at least 5 days before the meeting to assure that special needs are met.

SECTION 6.2 - PUBLIC NOTICES

The public shall be provided advance notice of the public hearings. A notice shall be published in the Classified Section of the Erie Times News under “Public Notices”, and if feasible, posted on the County’s website and the websites of the respective “OBO” municipalities, at least seven (7) calendar days prior to the hearing.

The Notice of Public Hearing #1 will contain the following information:

- The date, time and location of Public Hearing #1.
- A statement that the County or County “OBO” intends to make application to DCED for CDBG funds for which it is entitled to under the provisions of PA Act 179 of 1984.
- The amount of CDBG funds available or anticipated to be made available.
- The range of activities which can be undertaken with CDBG funds.
- Indicate that eligible activities must meet one of three (3) National Objectives and that the primary objective of the CDBG program is to benefit low-to-moderate income persons and that at least 70% of the CDBG monies must go towards meeting this Objective.
- A statement that citizens may comment/ provide input on potential projects as well as comment on the prior use of CDBG funds.
- A statement that the County has a Residential Anti-Displacement and Relocation Assistance Plan in place to address the possibility of the displacement of persons resulting from the undertaking of a CDBG funded activity.
- A statement that those unable to attend the hearing may comment on any of the topics to be discussed at the hearing by contacting the Erie County Department of Planning.
- A statement that the County and “OBO” municipalities will make every effort to provide reasonable accommodations for those with a disability if requested.

The Notice of Public Hearing #2 will contain the following information:

- The date, time and location of Public Hearing #2.
- Sufficient detail on the proposed use of funds to permit meaningful citizen comments at the public hearing.
- The deadline for comment prior to the date that the local governing body will meet to consider the application and where and when the proposed application may be inspected prior to the meeting of the local governing body.
- The date, time and location of the meeting where the local governing body will consider approval of the application. (This meeting must be after the second public hearing and the deadline for public comment).
- A statement that the County and “OBO” municipalities will make every effort to provide reasonable accommodations for those with a disability if requested.

SECTION 7 – NOTIFICATION OF NON-ENTITLEMENT MUNICIPALITIES

As noted in Section 1, the County receives an annual allocation of CDBG funds to benefit its “non-entitlement” municipalities and as such will provide these communities with information about the program.

Prior to the County’s Public Hearing #1, an informational /application packet will be mailed to each non-entitlement municipality informing them: (a) that the County will be preparing its annual application for CDBG funds; (b) that as a non-entitlement municipality they have an opportunity to apply for a share of the County’s CDBG dollars; (c) the amount of funds anticipated; (c) the deadline to submit their application/ funding request as well as the deadline to contact the ECDP to undertake an income survey, if required; and (d) program guidelines/regulations.

The non-entitlement municipalities are usually given three months to come up with a project; have an income survey undertaken if necessary; and submit their application/funding request to County Planning. Only applications/funding requests which meet the “eligibility” and “fundability” requirements of the CDBG program will be accepted by the ECDP.

SECTION 7.1 – PRIORITIZATION OF COUNTY PROJECTS- PROJECT PRIORITIZATION MEETING

Upon receiving the applications/funding requests for County CDBG funds from the non-entitlement municipalities the CDBG Administrator will prepare a list of the projects and forward it, along with copies of the applications, to the Planning Commission members for review approximately 2 weeks prior to the Project Prioritization Meeting. Planning Commission members are encouraged to contact the CDBG Administrator if they have any questions or would like clarification on any matter prior to the meeting.

The Project Prioritization meeting is normally held as part of a regularly scheduled Planning Commission meeting which is conducted monthly on the second Thursday of the month. At the prioritization meeting applicants will be given an opportunity to present their project and answer any questions from Commission members or the general public. After the project presentations, Planning Commission members will prioritize the projects for funding and make a recommendation to the County Executive who will finalize the project selections at a later date.

SECTION 8 – PROGRAM INFORMATION

Citizens will be provided full access to CDBG program information during all phases of the community development process. To facilitate citizen access, the CDBG administrator will keep all documents related to the CDBG program on file at the Erie County Department of Planning. Information from program/project files shall be made available for examination and duplication, on request, during regular business hours. CDBG program information and materials will be available and distributed to the public at the scheduled public hearings as outlined in this Plan.

Materials to be made available shall include, but are not necessarily limited to: the CDBG Citizen Participation Plan; minutes of public hearings; mailings; CDBG program applications; letters of approval; grant agreements; environmental review records; procurement and financial records; project design and construction specifications; labor standards documentation; performance and evaluation reports; annual and semi-annual reports required by DCED; written comments or complaints concerning the CDBG program and written responses from the CDBG Administrator; and copies of the applicable Federal and State rules, regulations, policies, requirements and procedures governing the CDBG program.

In no case shall the ECDP disclose any information concerning the financial status of any program participant which may be required to document program eligibility or benefit. Furthermore, the ECDP shall not disclose any information which may, in the opinion of the County Solicitor, be deemed of a confidential nature.

SECTION 9 – PROCEDURES FOR COMMENTS, OBJECTIONS AND COMPLAINTS

The Public Hearings described in this Citizen Participation Plan are designed to facilitate public participation in all phases of the CDBG process. Citizens are encouraged to submit their views and proposals at the public hearings. However, to ensure that citizens are given the opportunity to assess and comment on all aspects of the program on a continuous basis, citizens may, at any time, submit written comments or complaints to the CDBG Administrator who shall make every effort to provide written responses to citizen proposals or complaints within fifteen (15) working days of the receipt of such comments or complaints where practicable.

Records of all comments, objections and/or complaints by citizens concerning the CDBG program and subsequent action taken in response to those comments shall be maintained on file at the ECDP and shall be made available for public inspection upon request.

SECTION 10 – MODIFICATION TO COUNTY AND COUNTY “OBO” CDBG PROGRAM

The County and County “OBO” may at times need to make a “modification” to a fiscal year CDBG program. Modifications to any CDBG program that triggers citizen participation requirements include: (1) A new activity is proposed or an existing activity is to be deleted, and/or (2) the service area and or beneficiaries of an approved activity are to be changed from what was approved by DCED.

Before the modification request can be submitted to DCED, a public hearing must be held before the applicable governing body to provide citizens with an opportunity to review and comment on the proposed changes. Items to be discussed at the hearing include a brief description of the existing project and reason for the changes and how the new activity meets the eligibility and fundability requirements of the CDBG program.

As with Public Hearings #1 and #2, the public shall be provided advance notice of the public hearing to modify the CDBG program. A Notice shall be published in the Classified Section of the Erie Times News under “Public Notices”, and if feasible, posted on the County’s website and the websites of the respective “OBO” municipalities, at least seven (7) calendar days prior to the hearing.

SECTION 11 – MODIFICATION TO CITIZEN PARTICIPATION PLAN

The CDBG Citizen Participation Plan may be modified when necessary provided such modifications are consistent with Federal/State law, regulations and administrative requirements covering citizen participation. Prior to any modification, the ECDP will publish a Notice of Modification to the Citizen Participation Plan in the Classified Section of the Erie Times News under “Public Notices”; and if feasible, post on the County’s website and the websites of the respective “OBO” municipalities, at least fourteen (14) calendar days prior to the acceptance of the modification by County Council.

SECTION 12 – NO RESTRICTION OF AUTHORITY PROVISION

No section or portion of this CDBG Citizen Participation Plan shall be construed to restrict the authority and responsibility of the County of Erie acting through the Erie County Department of Planning (ECDP) in the development, implementation and execution of the County and the County “OBO” Community Development Block Grant Programs.

(Insert)
EXHIBIT 1

Erie County

Non-Entitlement and Entitlement Municipalities

 **County CDBG Program Jurisdiction**
(29 Non-Entitlement Municipalities)

 **State Entitlement Municipalities (7)**
(Washington Twp and Conneaut Twp have opted out of the program)

 **HUD Entitlement Municipalities**

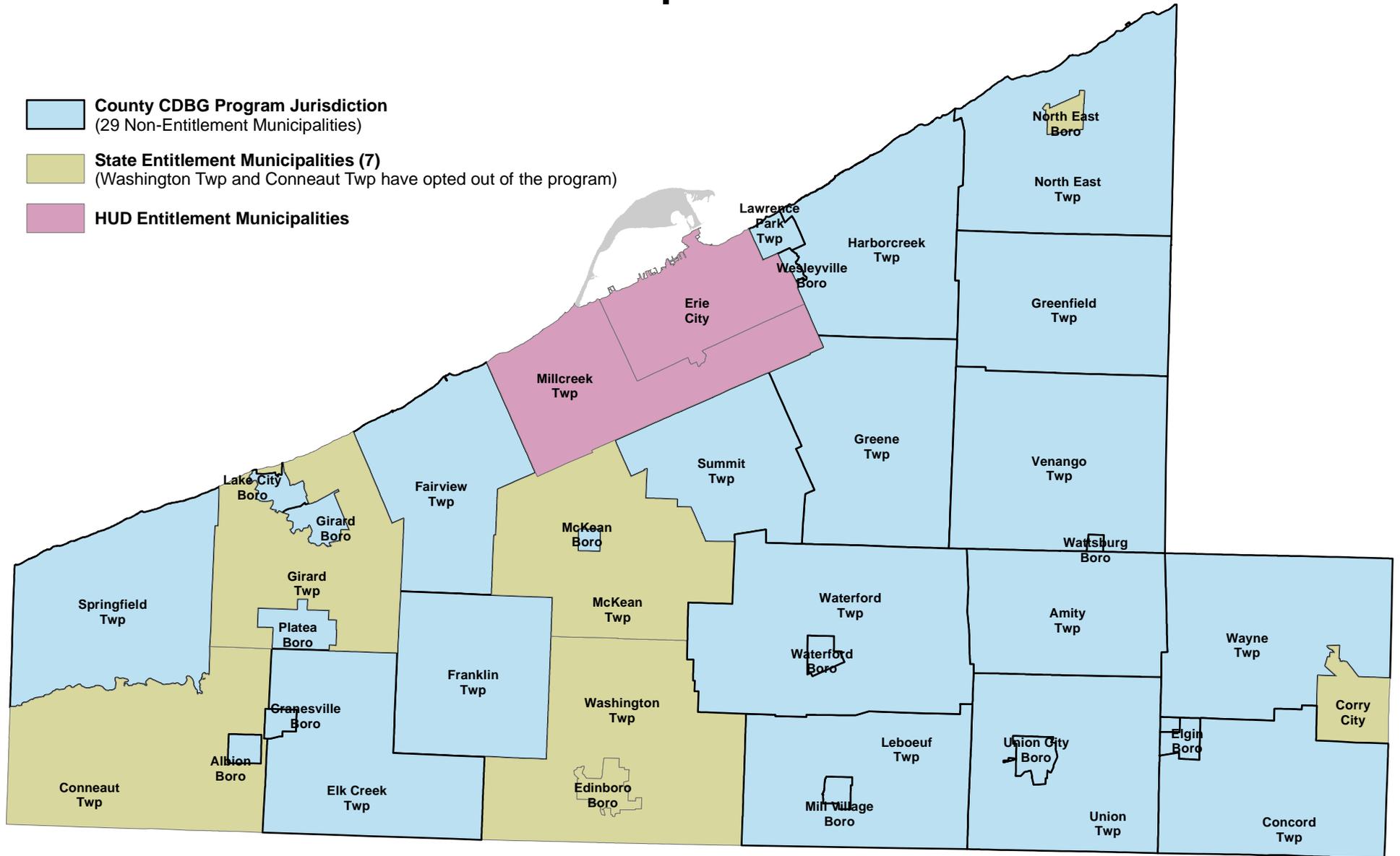


EXHIBIT 1

STATE “NON-ENTITLEMENT” MUNICIPALITIES OF ERIE COUNTY

1	Albion Borough
2	Amity Township
3	Concord Township
4	Cranesville Borough
5	Elgin Borough
6	Elk Creek Township
7	Fairview Township
8	Franklin Township
9	Girard Borough
10	Greene Township
11	Greenfield Township
12	Harborcreek Township
13	Lake City Borough
14	Lawrence Park Township
15	Leboeuf Township
16	McKean Borough
17	Mill Village Borough
18	North East Township
19	Platea Borough
20	Springfield Township
21	Summit Township
22	Union Township
23	Union City Borough
24	Venango Township
25	Waterford Borough
26	Waterford Township
27	Wattsburg Borough
28	Wayne Township
29	Wesleyville Borough

STATE “ENTITLEMENT” MUNICIPALITIES OF ERIE COUNTY

1	Conneaut Township
2	Corry City
3	Edinboro Borough
4	Girard Township
5	McKean Township
6	North East Borough
7	Washington Township

HUD “ENTITLEMENT” MUNICIPALITIES OF ERIE COUNTY

1	Erie City
2	Millcreek Township