



**Bristol Township
Community Development Department**

**2019 Annual Action Plan
June 24, 2018**

**CARES ACT Amendment
July 14, 2020**

**2019 Annual Action Plan
Substantial Amendment
August 14, 2020**

Bristol Township advertised our 2020-2024 Con Plan and for a Substantial Amendment of the 2019 Action Plan. The current 2019 Action Plan has allocated funding for a public facility and infrastructure improvement for the creation of a park (JFK Park). The engineering has been completed, but with COVID-19, the Township has decided to place the construction of JFK Park on hold and re-allocate the funding for a new Senior Center, with additional funds from 2020 (in our proposed Con Plan).

Executive Summary

AP-05 Executive Summary - 24 CFR 91.200(c), 91.220(b)

1. Introduction

Bristol Township, Pennsylvania is an entitlement community under the U.S. Department of Housing and Urban Development's (HUD) community Development Block Grant Program (CDBG). In compliance with HUD regulations, Bristol Township has prepared its FY 2019 Annual Action Plan for the period of July 1, 2019 through June 30, 2020. The FY 2019 Annual Action Plan is a strategic guideline for the implementation of the Township's administration, housing and public facility improvements activities. This is the fifth and final Annual Action Plan under the Township's FY 2015-2019 Consolidated Plan.

During the FY 2019 Program Year, Bristol Township will receive a CDBG allocation of \$602,959 and anticipates \$0 in CDBG Program Income. Bristol Township proposes the following activities with the FY 2019 CDBG Funds:

Administration \$120,591
Housing \$100,000
Public Facility & Infrastructure Improvements \$382,368

The Community Development Department allocated the public facility and infrastructure improvements for the expansion of JFK park in West Bristol to include a walking path, basketball courts, a pavilion and tables, restrooms, cameras and a parking lot. A new swing/play structure has replaced the previous structure, and the expansion of the park has been fully engineered, and is now a shovel ready project. The Community Development Department is submitting a Substantial Amendment to reallocate the funds not spent on public facilities and infrastructure improvements to create a new activity for a new senior center. Since COVID 19 began, the senior center has been shuttered. COVID 19 funds are being used to fund programs and program needs. The funding of the renovations will come from 2019 FY and 2020 FY, with additional unspent funds.

This Action Plan also has been amended to include the spending plan for the COVID-19 CDBG funds allocated in April 2020 in response to the CARES Act. The allocation for Bristol Township for the COVID-19 pandemic is \$374,312. Bristol Township proposes the following activities that will prepare for; respond to; or prevent COVID-19:

Administration \$74,862

Public Services \$299,450

2. Summarize the objectives and outcomes identified in the Plan

This could be a restatement of items or a table listed elsewhere in the plan or a reference to another location. It may also contain any essential items from the housing and homeless needs assessment, the housing market analysis or the strategic plan.

Bristol Township has identified three priority needs and nine goals to address those needs in the 2015-2019 Consolidated Plan. The priority needs include: 1) Improving Affordable Housing Options, 2) Providing for Suitable Living Environments and 3) Improving the Capacity of Area Housing and Community Service Providers. To provide for those needs, the goals for the 2019 FY and COVID-19 funds are as follows:

- Assist Home Owners with Needed Repairs
- Promote Fair Housing
- Provide for Special Needs Housing Opportunities
- Reduce Hazards in Homes
- Increase Capacity of Housing and Service Providers

CARES ACT Funding:

Provide support for the Bristol Township Senior Center

Provide support for the homeless shelter in Bristol Township

Provide emergency 3-month maximum rental and mortgage assistance to low-income households to prevent eviction due to COVID-19

Provide services and programs for youth in low-income areas to cope with COVID 19 repercussions

Provide services and programs for families in low-income areas to cope with COVID 19 repercussions

During the FY 2019 CDBG Program Year Bristol Township proposes to address the following priority need categories identified in its FY 2015 to 2019 Consolidated Plan:

Administration: There is a continuing need for planning, administration, management, and oversight of Federal, state, and local funded programs.

Housing: There is a need to improve the quality of the housing stock in the community by increasing the amount of decent, safe, sound, and accessible housing for homeowners, renters, and homebuyers that is affordable to low to moderate persons and families. Additionally, repairs to homes, as needed for low to moderate income, owner occupied residents will continue.

Fair Housing: Promote fair housing choice through education and outreach in the community.

Public Facilities Infrastructure Improvements: Bristol Township is committed to improving the quality of life for its residents through improvements to public facilities. Renovations to the Bristol Township Senior Center will improve the Township's ability to respond to the senior population and expand the services that are offered. During the pandemic, it has become more apparent that the Township needs to provide increasing support to our seniors.

Responding to the COVID-19 crisis:

Bristol Township intends to use these funds to provide additional operational support to the Senior Center and the homeless shelter, provide additional food support to the elderly and low/mod population in order to respond to the increase in need, provide emergency 3-month maximum mortgage and rental assistance to low-income households to prevent eviction and provide services to youth and families dealing with any repercussions due to COVID-19..

3. Evaluation of past performance

This is an evaluation of past performance that helped lead the grantee to choose its goals or projects.

Each year the Township prepares its Consolidated Annual Performance Evaluation Report. This report is submitted within ninety (90) days after the start of the new program year. The FY 2018 CAPER will be submitted to HUD by the required deadline of September 30, 2019.

4. Summary of Citizen Participation Process and consultation process

Summary from citizen participation section of plan.

Bristol Township prepared its Annual Action Plan in compliance with the Township's Citizen Participation Plan. The Township held its required Public Hearing for the recommendation of the FY 2019 Action Plan submission as advertised on June 20, 2019.

For the CDBG-CV funds, HUD allowed a shortened public comment period and virtual public hearing. Bristol Township has amended its Citizen Participation Plan to allow for these altered requirements. The public comment period was held between May 11-15, 2020, and the virtual public hearing was conducted on May 13, 2020.

For the Substantial Amendment a presentation on the Substantial Amendment was given on July 16, 2020. The Substantial Amendment was advertised for public comment period on from July 13, 2020 to August 11, 2020 to give the public an opportunity to review and make comments to the draft plan. The public hearing was held on August 14, 2020.

5. Summary of public comments

This could be a brief narrative summary or reference an attached document from the Citizen Participation section of the Con Plan.

Bristol Township prepared its Annual Action Plan in compliance with the Township's Citizen Participation Plan, an amended version of which is attached to this amendment. No public comments.

6. Summary of comments or views not accepted and the reasons for not accepting them

No comments were received.

7. Summary

The goal of the FY 2019 Annual Action Plan is to improve the living conditions for all residents of the Township, to create a suitable and sustainable living environment, and to address the housing and community development needs of the Township.

The FY 2019 Annual Action Plan presents activities the Township will undertake during the program year beginning July 1, 2019 and ending June 30, 2020. During the FY 2019 Program Year, Bristol Township, Pennsylvania anticipates CDBG Funds of \$602,959 and CDBG Program Income of \$0. Additional funds of \$374,312 provided by the CARES Act in April 2020 are also included in this Annual Action Plan.

In light of the COVID-19 crisis, Bristol Township is striving to get funds available to social services organizations dealing with the brunt of the community needs in this stressful time. Bristol Township is utilizing the amended public comment period and shortened public planning process in order to respond as quickly as possible. Additionally, the Substantial Amendment for the reallocation of funds for a new senior center will be used with 2020 Funds.

PR-05 Lead & Responsible Agencies – 91.200(b)

1. Agency/entity responsible for preparing/administering the Consolidated Plan

Describe the agency/entity responsible for preparing the Consolidated Plan and those responsible for administration of each grant program and funding source.

Agency Role	Name	Department/Agency
CDBG Administrator	BRISTOL TOWNSHIP	Community Development Department

Table 1 – Responsible Agencies

Narrative (optional)

Bristol Township’s Office of Community Development is the administrating agency for the CDBG program. The Office of Community Development prepares the Five Year Consolidated Plan, Annual Action Plan, Environmental Review Records (ERR’s), the Consolidated Annual Performance Evaluation Report (CAPER), monitoring, pay requests, contracting, and oversight of the programs on a day to day basis. In addition, the Township has a consulting firm available to assist the Office.

Consolidated Plan Public Contact Information

Bristol Township
 2501 Bath Road
 Bristol, PA 19007
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 (267) 812-2914

AP-10 Consultation – 91.100, 91.200(b), 91.215(I)

1. Introduction

Bristol Township coordinates and refers residents to the Bucks County Housing Authority, Bucks County Opportunity Council, housing providers, fair housing organizations, community and youth social services, Redevelopment Authority of Bucks County and Bucks County Community Development Department. Input from these consultations were used in the development of the specific goals and strategies to be addressed with FY 2019 CDBG funds.

Since the approval of the FY2019 ACTION Plan, COVID-19 has created changed priorities. The use of the CARES ACT funding will provide support and services for seniors, homeless and emergency assistance to families in need. Additionally funds from a proposed park renovation have been shifted to renovation of Bristol Township's Senior Center to create virtual and social distancing space and activities.

Provide a concise summary of the jurisdiction's activities to enhance coordination between public and assisted housing providers and private and governmental health, mental health and service agencies (91.215(I))

Bristol Township is engaged in efforts and initiatives to enhance coordination between public and assisted housing providers, as well as private and governmental health, mental health, and social service agencies. The Township works with the following agencies to enhance funding and service allocations to address the housing and community development needs of the Township:

Bucks County Housing Authority: Manages the Public Housing and Section 8 Housing Choice Voucher Program, creates improvements to public housing communities, and develops affordable housing.

Bucks County Opportunity Council: Provides services to reduce poverty and promote economic self-sufficiency.

Family Service Association: Manages the Bucks County Emergency Homeless Shelter in Bristol Township.

Social Services Agencies: Provides services to address the needs of low and moderate-income residents.

Housing Providers: Rehabilitates and develops affordable housing for low and moderate-income families and individuals.

Bucks County CoC: Oversees the Continuum of Care Network for Bucks County.

Collaboration and coordination with these entities will continue throughout the remaining Consolidated Plan period to capitalize on potential future funding opportunities.

Bristol Township has been in collaboration with the Senior Center since the beginning of 2020.

Describe coordination with the Continuum of Care and efforts to address the needs of homeless persons (particularly chronically homeless individuals and families, families with children, veterans, and unaccompanied youth) and persons at risk of homelessness.

Bucks County Department of Housing is the lead agency for the Housing Continuum of Care of Bucks County (CoC), the organization responsible for the planning and implementation of housing and homeless programs in Bucks County. The CoC membership includes representation by housing providers, mental health and drug and alcohol treatment providers, emergency shelters and outreach organizations, faith-based organizations, youth services, and other interested organizations. The Bucks County Department of Housing is an active partner in the creation and implementation of the Bucks County Housing Link, the central point of information, assessment, and referral services for all Bucks County residents experiencing a housing crisis. Recently, Housing Link has undergone a thorough evaluation and upgrade to make it more responsive to the needs of the clients and the process Bucks County utilizes to address those needs.

As the Lead Agency, the Bucks County Department of Housing submits the annual CoC Program application for funding on behalf of the CoC-funded agencies and regularly evaluates program performance.

Describe consultation with the Continuum(s) of Care that serves the jurisdiction's area in determining how to allocate ESG funds, develop performance standards for and evaluate outcomes of projects and activities assisted by ESG funds, and develop funding, policies and procedures for the operation and administration of HMIS

The Bucks County Department of Housing also collaborates with the CoC Executive Committee to implement and evaluate Emergency Solutions Grant (ESG) funded programs.

Data from the Housing Link is used by the CoC to identify and serve the highest need populations. The Bucks County Department of Housing and CoC regularly evaluate performance measures and outcomes for programs funded through the CoC and ESG programs. This evaluation assists the Bucks County Department of Housing to determine the needs of homeless persons, identify system and service gaps, and allocate limited resources.

The Bucks County Department of Housing actively provides leadership and coordinates with the CoC in the implementation of the ESG program. The Bucks County Department of Housing administers and monitors all ESG-funded projects including those funded through the ESG entitlement program and those that are awarded through Pennsylvania's competitive ESG program. ESG funding is used to

provide emergency shelter operations, rapid re-housing, and homeless prevention services. The application, review and ranking process for ESG funding is facilitated by The Bucks County Department of Housing. ESG funding announcements are coordinated through the CoC and include a discussion of eligible activities, available funding, and a timeline for application and implementation. Bristol Township does not receive ESG funding.

The CoC Executive Committee provides input into the selection of ESG projects for approval and the CoC Outcomes Subcommittee assists with evaluating ESG outcomes based on the performance standards developed for the program.

2. Describe Agencies, groups, organizations and others who participated in the process and describe the jurisdiction's consultations with housing, social service agencies and other entities

Table 2 – Agencies, groups, organizations who participated

1	Agency/Group/Organization	Bucks County Housing Authority
	Agency/Group/Organization Type	Housing PHA Services - Housing
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Homelessness Strategy Non-Homeless Special Needs Economic Development
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	The Bucks County Housing Authority was consulted to determine the housing and community development needs in Bristol Township.
2	Agency/Group/Organization	Bucks County Department of Housing and Community Development
	Agency/Group/Organization Type	Services-homeless Other government - County
	What section of the Plan was addressed by Consultation?	Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Homelessness Strategy
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	The Bucks County Department Housing and Community Development was consulted to determine the housing and community development needs in Bristol Township.
3	Agency/Group/Organization	HABITAT FOR HUMANITY
	Agency/Group/Organization Type	Housing

	What section of the Plan was addressed by Consultation?	Housing Need Assessment Public Housing Needs
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Bristol Township met with Habitat for Humanity to discuss several proposed housing projects in the Township.
4	Agency/Group/Organization	FAMILY SERVICES ASSOCIATION
	Agency/Group/Organization Type	Housing Services - Housing Services-Persons with Disabilities Services-Persons with HIV/AIDS Services-homeless Services-Health
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Homelessness Strategy
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Bristol Township met with Family Services Association of Bucks County to discuss the shelter and affordable housing needs in Bristol Township.
5	Agency/Group/Organization	Bucks County Planning Commission
	Agency/Group/Organization Type	Other government - County Planning organization Business Leaders

	What section of the Plan was addressed by Consultation?	Economic Development
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Bristol Township has been working with the Bucks County Planning Commission on the Turnpike and I-95 connection and economic development potential.
6	Agency/Group/Organization	BUCKS COUNTY REDEVELOPMENT AUTHORITY
	Agency/Group/Organization Type	Housing Planning organization
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Economic Development
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Bristol Township has been working with the RDA on economic development opportunities.
7	Agency/Group/Organization	BUCKS COUNTY OPPORTUNITY COUNCIL
	Agency/Group/Organization Type	Housing Services - Housing Services-homeless Services-Education Services-Employment
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Homeless Needs - Chronically homeless Homeless Needs - Families with children Economic Development

	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	The Bucks County Opportunity Council opened the doors to a newly renovated 6,400 Opportunity Center in the Fall of 2018. This Center includes a Housing Resource Center, Homeless Recharge Center, Economic Stability Center, Training Enterprise Center and Emergency Services that offers short-term assistance for individuals and families facing a crisis such as utility shut-off, transportation repair costs and food assistance.
8	Agency/Group/Organization	Bristol Township Senior Center
	Agency/Group/Organization Type	Services-Elderly Persons
	What section of the Plan was addressed by Consultation?	Non-Homeless Special Needs
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Bristol Township met with the Senior Center to discuss renovations and the need for our seniors.

Identify any Agency Types not consulted and provide rationale for not consulting

All required agency types were consulted.

Other local/regional/state/federal planning efforts considered when preparing the Plan

Name of Plan	Lead Organization	How do the goals of your Strategic Plan overlap with the goals of each plan?
Continuum of Care	Bucks County Housing & Community Development	The CoC is the primary provider of housing and supportive services for the areas homeless and at risk of being homeless. The goals of the Strategic Plan are strategically linked and mutually supportive with the following goals of the CoC Strategic Plan: Reducing the Number of Homeless Individuals and Families, Shortening the Length of Time Spent Homeless, Increasing Employment Among Homeless Individuals, and Increasing the Number of Permanent Affordable Housing Units Available.

Table 3 – Other local / regional / federal planning efforts

Narrative (optional)

The strategy of the Township of Bristol's Annual Action Plan is to develop a viable community by promoting integrated approaches that provide decent housing, a suitable living environment, and expand economic opportunities for low and moderate-income persons. The primary means towards this end is the development of partnerships among all levels of government and the private sector, including for profit and nonprofit organizations. The Annual Action Plan is an application for FY 2019 CDBG funds under HUD's formula grant program. The Annual Action Plan combined with the Five Year Consolidated Plan act as a strategic vision to be followed by the Township in carrying out federal programs that primarily benefit low and moderate-income persons.

AP-12 Participation – 91.105, 91.200(c)

1. Summary of citizen participation process/Efforts made to broaden citizen participation Summarize citizen participation process and how it impacted goal-setting

Bristol Township prepared its Annual Action Plan in compliance with the Township's Citizen Participation Plan.

The Township held its required Public Hearing for the recommendation of the FY 2019 Action Plan submission as advertised, on June 20, 2019.

During the COVID-19 pandemic, several meetings and discussions were held with the Bristol Township Senior Center and Homeless Shelter Directors, as well as with area service providers to discuss the growing need to provide for PPE, cleaning supplies, technology improvements for communication while apart, laundry services and additional support staff and mental health services. An additional public hearing to address the amendments in this plan was held electronically on May 13, 2020.

A public review period was open from July 13, 2020 to August 11, 2020 to give the public an opportunity to review and make comments to the draft substantial amendment plan. A public hearing was held on August 13, 2020 at the Bristol Township Council Meeting to discuss the Consolidated Plan and first year Action Plan and the substantial amendment to the FY2019 Action Plan..

Citizen Participation Outreach

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
1	Public Hearing	Non-targeted/broad community	There was a public hearing at the Bristol Township Council Meeting on June 20, 2019 at 7:00 pm, located at the Bristol Township Municipal Building, 2501 Bath Road, Bristol, P A 19007. The meeting was open to the public. There was an additional public hearing on May 13, 2020 to discuss the CARES Act funding. And an additional hearing on August 13, 2020 for the substantial amendment.	There were no comments received.	There were no comments received.	

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (if applicable)
3	Public Meeting	Specific Low Moderate Area	Twenty (20) people attended. All were in favor of removing the old equipment. Many expressed concerns about lighting and vandalism.	Several park walk throughs with the Snowden Ave residents. Replacement structures and walking trail are desired.	All comments were accepted.	
4	5-Day Public Comment Period	Non-targeted/broad community	In accordance with an amended Citizen Participation Plan to allow for a shortened public comment period in order to hasten changes to address the covid-19 crisis, a public comment period was held from May 11 - 15, 2020.			

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (if applicable)
5	Public Meeting	Non-targeted/broad community	A virtual public hearing was held on May 13, 2020 to discuss the CARES Act funding. Several residents and some of our service providers attended.	No comments were received.	No comments were received.	

Table 4 – Citizen Participation Outreach

Expected Resources

AP-15 Expected Resources – 91.220(c)(1,2)

Introduction

Bristol Township will receive \$602,959 as its CDBG allocation for the FY 2019 Program Year. The Township does not expect to receive any Program Income during the FY 2019 Annual Action Plan period. The Township's FY 2019 CDBG program year starts on July 1, 2019 and concludes on June 30, 2020. The Township will also receive a \$374,312 allocation from the CARES Act. The following financial resources are identified for the FY 2019 Annual Action Plan and will be used to address the following priority needs: Housing; Public Facilities; Community Development; Public Services; and Administration, Planning, and Management. The accomplishments of these projects/activities will be reported in the FY

Anticipated Resources

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
CDBG	public - federal	Acquisition Admin and Planning Economic Development Housing Public Improvements Public Services	602,959	0	0	602,959	0	Funding at same rate over the remaining year
Other	public - federal	Admin and Planning Public Services	374,312	0	0	374,312	0	Special funding to counteract the covid-19 pandemic.

Table 5 - Expected Resources – Priority Table

Explain how federal funds will leverage those additional resources (private, state and local funds), including a description of how matching requirements will be satisfied

In addition to the Federal funding identified above, the Township is milling and resurfacing an additional 2.5 miles of in the Lakeland, Blue Ridge and Westwood Sections of the Township; approved contract at \$536,043.

Bristol Township has also contracted and begun construction on 51 ADA curb ramps intersections for a contract price of \$462,930.

Bristol Township received a PennDOT Grant for Route 13 Beautification Phase II for new sidewalks, curbs, installation of ADA curb ramps and pedestrian crossings, street lighting and stormwater management.

Bristol Township received a \$250,000 Pennsylvania Department of Community and Economic Development (PADCED) grant for the Passive Park improvements at Cedar Avenue Park.

The Township, working with the Redevelopment Authority of Bucks County, has also budgeted \$1 million dollars for the removal of blighted abandoned dwellings and buildings throughout the Township.

The Township has worked with the Bucks County Planning Commission and the Philadelphia Great Economy League and received an \$80,000 TCDI Grant. A \$20,000 match was required, with \$10,000 from the BCPC and \$10,000 from Bristol Township. The focus was economic development initiatives and development potential for when the Turnpike and I-95 Interstate connect in Bristol Township, together with looking at the zoning map and ordinances for enhancement. The report was recently completed and will be considered by the Council in June 2019.

Bristol Township received a grant from PADCED in the amount of \$347,833 to replace the generator at the Township Wastewater Treatment Plant. Bristol Township has received its necessary approval from the PA Department of Environmental Protection for the \$6 Million expansion and upgrade to the Wastewater Treatment Plant and hope to begin construction in the FY 2019 year.

Bristol Township is expanding the Municipal Complex and Recreation Facilities with a \$6 Million expansion project that will include a turf football field, a practice field, a baseball field, concession stand, bathroom facility, walking trail, amphitheater, spray park and inclusive playground. Bristol Township received a \$240,000 DCED grant for the spray park and is using its \$1 Million Bucks County Open Space money for this project.

If appropriate, describe publically owned land or property located within the jurisdiction that may be used to address the needs identified in the plan

The township has undertaken the creation of a municipal park complex adjacent to the Bristol Township Senior Center. This new park is expected to increase the importance of the senior center to the Township's residents and the center is in need of renovations in order to address the expanding need. The current senior center is owned by the Township.

Discussion

The program year from July 1, 2019 through June 30, 2020. These funds will be used to address the following priority needs:

- Public Facility Improvements
- Housing
- Administration
- Public Services

CARES Act funding will provide Public Services and Administration

Annual Goals and Objectives

AP-20 Annual Goals and Objectives

Goals Summary Information

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
1	1A: Assist Homeowners with Needed Repairs	2015	2019	Affordable Housing		Providing for Suitable Living Environments	CDBG: \$160,295	Homeowner Housing Rehabilitated: 13 Household Housing Unit
2	2C: Improve Public Facilities & Infrastructure	2015	2019	Non-Housing Community Development		Improving the Capacity of Area Service Providers Providing for Suitable Living Environments	CDBG: \$382,368	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 1500 Persons Assisted
3	3A: Increase Capacity of Area Service Providers	2015	2019	Non-Housing Community Development		Improving the Capacity of Area Service Providers	CARES Act: \$299,450	Public service activities other than Low/Moderate Income Housing Benefit: 600 Persons Assisted Public service activities for Low/Moderate Income Housing Benefit: 40 Households Assisted Homeless Person Overnight Shelter: 500 Persons Assisted

Table 6 – Goals Summary

Goal Descriptions

1	Goal Name	1A: Assist Homeowners with Needed Repairs
	Goal Description	Work with eligible owner-occupied home owners for emergency housing needs and repairs. If funds are available, work with affordable housing providers and builders to improve/rehab affordable units.
2	Goal Name	2C: Improve Public Facilities & Infrastructure
	Goal Description	Creation of JFK Park. The substantial amendment will reallocated the funds not used for the JFK park to the renovation for a new senior center.
3	Goal Name	3A: Increase Capacity of Area Service Providers
	Goal Description	Providing funding to area service providers for food, housing and small business relief during the covid-19 pandemic.

Projects

AP-35 Projects – 91.220(d)

Introduction

In order to address the priority needs of Bristol Township, the proposed FY 2019 Annual Action Plan proposes the following:

Projects

#	Project Name
1	Administration
2	Public Facility Improvements
3	Housing Programs
4	CARES Act Public Service
5	CARES Act Administration

Table 7 - Project Information

Describe the reasons for allocation priorities and any obstacles to addressing underserved needs

CDBG funds are intended to provide lower and moderate-income households with viable communities, including decent housing, suitable living environments and expanded economic opportunities. Eligible activities included in the allocation proprieties include improving public facilities & infrastructure, housing repairs, affordable housing, and planning and administration. For the COVID-19 funds, will provide administration and public service operation and counseling.

AP-38 Project Summary
Project Summary Information

1	Project Name	Administration
	Target Area	
	Goals Supported	1A: Assist Homeowners with Needed Repairs 2C: Improve Public Facilities & Infrastructure
	Needs Addressed	Providing for Suitable Living Environments
	Funding	CDBG: \$120,591
	Description	Provide program management and oversight for the successful administration of Federal, state and local funded programs, including environmental clearance, fair housing and compliance with all Federal, state and local law regulations.
	Target Date	6/30/2020
	Estimate the number and type of families that will benefit from the proposed activities	N/A
	Location Description	Township-wide
	Planned Activities	Administration on activities related to the Action Plan and other required parts of the CDBG Program.
2	Project Name	Public Facility Improvements
	Target Area	
	Goals Supported	2C: Improve Public Facilities & Infrastructure
	Needs Addressed	Providing for Suitable Living Environments
	Funding	CDBG: \$382,368
	Description	Renovation of the Bristol Township Senior Center.
	Target Date	6/30/2020
	Estimate the number and type of families that will benefit from the proposed activities	Approximately 600 seniors who use the Senior Center will benefit from this activity.
	Location Description	The Senior Center is located in the municipal complex at 2501 Bath Road, Bristol, PA 19007.
	Planned Activities	This will include engineering activities and hard costs for the renovations.

3	Project Name	Housing Programs
	Target Area	
	Goals Supported	1A: Assist Homeowners with Needed Repairs
	Needs Addressed	Providing for Suitable Living Environments
	Funding	CDBG: \$100,000
	Description	Rehabilitation and emergency repairs for owner occupied low and moderate residents in the Township, as well as working with housing providers.
	Target Date	6/30/2020
	Estimate the number and type of families that will benefit from the proposed activities	Approximately 13 low/mod households will benefit from this program.
	Location Description	Township-wide
	Planned Activities	Emergency Repairs for roofs, heaters, and sewer.
4	Project Name	CARES Act Public Service
	Target Area	
	Goals Supported	3A: Increase Capacity of Area Service Providers
	Needs Addressed	Improving the Capacity of Area Service Providers
	Funding	CARES Act: \$299,450
	Description	Funding for area service providers addressing the covid-19 pandemic.
	Target Date	6/30/2021
	Estimate the number and type of families that will benefit from the proposed activities	It is anticipated that up to 1,000 low- and moderate-income families and seniors will benefit from the proposed activities.
	Location Description	
	Planned Activities	The activities planned under this project include operational funding for the Bristol Township Senior Center and the Bucks County Emergency Homeless Shelter, food programs for seniors and low- and moderate-income households, and a rental assistance program for low- and moderate-income households.
	Project Name	CARES Act Administration

5	Target Area	
	Goals Supported	2C: Improve Public Facilities & Infrastructure 3A: Increase Capacity of Area Service Providers
	Needs Addressed	Providing for Suitable Living Environments Improving the Capacity of Area Service Providers
	Funding	CARES Act: \$74,862
	Description	Administration for Covid-related projects and activities.
	Target Date	
	Estimate the number and type of families that will benefit from the proposed activities	Effective administration of this grant will benefit all anticipated recipients.
	Location Description	
	Planned Activities	

AP-50 Geographic Distribution – 91.220(f)

Description of the geographic areas of the entitlement (including areas of low-income and minority concentration) where assistance will be directed

Bristol Township will direct CDBG funds areawide for housing needs meeting the required low and moderate income eligibility and target low and moderate income areas for public facility and infrastructure improvements and public services.

The COVID-19 fund allocation of \$374,812 will provide for public services that include operations for Limited Clientel for seniors and homeless, as well as public services programs for low to moderate income families. The Township will budget \$74,862 of these funds for general administration.

Geographic Distribution

Target Area	Percentage of Funds

Table 8 - Geographic Distribution

Rationale for the priorities for allocating investments geographically

Bristol Township has allocated its CDBG funds for FY 2019 based on activities that will principally benefit low and moderate-income persons, namely seniors. The Community Development activities have a low and moderate-income service area benefit or clientele. The Housing activities that have an income eligibility requirement and will be awarded to qualifying low and moderate-income households throughout the Township.

Discussion

Under the Program Year 2019 CDBG Program, Bristol Township will receive a grant in the amount of \$602,959 and anticipates no program income for the year. The Township will budget \$120,591 for general administration. The balance of funds will be allocated to activities which principally benefit limited clientele and low and moderate-income persons in the

amount of \$482,369.

The COVID-19 fund allocation of \$374,812 will provide for public services that include operations for Limited Clientel for seniors and homeless, as well as public services programs for low to moderate income families. The Township will budget \$74,862 of these funds for general administration.

Affordable Housing

AP-55 Affordable Housing – 91.220(g)

Introduction

Bristol Township recently joined the Bucks County HOME Consortium and will be able to refer projects that include affordable housing for funding. In addition, utilizing CDBG funding, each year the Township estimates serving about thirteen (13) low-income owner-occupied households through its emergency home repair program.

One Year Goals for the Number of Households to be Supported	
Homeless	0
Non-Homeless	13
Special-Needs	0
Total	13

Table 9 - One Year Goals for Affordable Housing by Support Requirement

One Year Goals for the Number of Households Supported Through	
Rental Assistance	0
The Production of New Units	0
Rehab of Existing Units	13
Acquisition of Existing Units	0
Total	13

Table 10 - One Year Goals for Affordable Housing by Support Type

Discussion

The Township has allocated \$100,000 in FY 2019 CDBG funds for the rehabilitation of affordable housing. This allocation is for emergency repairs such as sewer line repairs, roofing, heater repairs, on owner occupied homes for eligible low to moderate income families. If possible, we will also work with local home construction providers for affordable housing.

AP-60 Public Housing – 91.220(h)

Introduction

The previously recognized Weed and Seed Steering Committee has evolved into “Freedom Neighborhood One,” a nonprofit organization charged with continuing the good works of the Weed and Seed program and adding more programs as funds are available to reach adults and children in need or at risk.

Freedom Neighborhood One primarily works within the Venice-Ashby neighborhoods comprised of the Township’s largest concentration of public housing. This organization is administered by the Bucks County Housing Authority which also supports two community police officers to patrol public housing facilities under its Capital Grant. The Housing Authority actively enforces the “One Strike and You Are Out” initiative.

Actions planned during the next year to address the needs to public housing

The Township, in partnership with the Police Department and the Bucks County Public Housing Authority, will provide additional funding for installation of security cameras in the proposed park improvements. Similar efforts in this community have resulted in a significant reduction in crime.

Additionally, the Bucks County Housing Authority will continue to pursue additional sources of funding and partner with public and private organizations to improve services and address the needs of public housing residents.

Actions to encourage public housing residents to become more involved in management and participate in homeownership

In accordance with the BCHA Designated Housing Plan, the PHA works to improve the living environment of low-and moderate-income families through the designation of certain buildings for particular resident groups (ie. elderly, disabled, families). Additionally, the BCHA gathers resident input into the development of the BCHA Annual Plan through coordination with established Resident Councils and conducting resident surveys. The BCHA’s Board of Directors also includes a Public Housing Resident.

The BCHA works with the public and non-profit service agencies to ensure necessary services are available on-site for public housing residents.

If the PHA is designated as troubled, describe the manner in which financial assistance will be

provided or other assistance

The PHA is not designated as troubled.

Discussion

Bristol Township has identified the need for decent, safe, sanitary housing. The largest income group affected by housing problems is the extremely low-income households. The Bucks County Housing Authority is an important part of Bristol Township's housing strategy. BCHA is the primary assisted housing provider of housing for extremely low income, very low income and lower income residents of Bucks County and Bristol Township.

AP-65 Homeless and Other Special Needs Activities – 91.220(i)

Introduction

The Township has worked and is continuing to work with agencies providing assistance to housing, social service agencies, and other entities, including those focusing on services to children, elderly persons, persons with disabilities, persons with HIV/AIDS and their families, and homeless persons.

The Township, through its Office of Community Development, is a member of the Bucks County Continuum of Care spearheaded by the Bucks County Community Development and Housing Department.

As a member of the Bucks County Continuum of Care and the Human Services Housing Coalition, Bristol Township is aware of the many opportunities available to the Homeless. The homeless in Bristol Township are eligible to participate in the many programs and opportunities offered by the Continuum. Bristol Township makes timely referrals for those in need to both the shelter and the Bucks County Housing Authority.

Funds from the Bristol Township CDBG Program have provided financial support to the one shelter for the homeless operated by the Bucks County Emergency Homeless Shelter. It is located in Bristol Township. The Township refers homeless persons to the shelter. In addition, the Township works with the Bucks County Opportunity Council. The BCOC opened its Opportunity Center in Bristol Township in the Fall of 2018.

Describe the jurisdictions one-year goals and actions for reducing and ending homelessness including

Reaching out to homeless persons (especially unsheltered persons) and assessing their individual needs

The Township in partnership with the Bucks County CoC works on reaching out to homeless persons and assessing their individual needs. The CoC regularly analyzes the Annual Performance Reports for programs serving the homeless to assess performance and improve access to mainstream programs. Additionally, the CoC coordinates with publicly-funded systems of care through Discharge Policies to ensure individuals are not released into homelessness. These systems include: Health, Mental Health, Children and Youth, and Corrections.

Homeless households are assessed upon entry into the homeless system to identify mainstream

resources for which they are eligible. Support services in the form of case management is provided to individuals to apply for and obtain a variety of mainstream benefits.

Addressing the emergency shelter and transitional housing needs of homeless persons

The Bucks County Housing Link is used for assessing the needs of the homeless and those unsustainably housed in the County and the Township. Currently, Housing Link is the centralized point of information, assessment, and referral services for all Bucks County residents experiencing a housing-related crisis. Case managers across the County are able to use the Housing Link to provide the best assessment and housing assistance possible. Bucks County currently has 171 total homeless beds - including 77 seasonal beds. Seasonal beds are available on nights that are declared a Code Blue (overnight temperature below 30 degrees).

We closely monitor transitional housing as these units make up most of housing beds available for the homeless. Housing is considered transitional when short-term rental assistance and support services are provided for up to 24 months. There is a total of 351 transitional housing units serving primarily families with children (85% of all TH).

There are a total of 159 Permanent Housing Units in Bucks County. Of these, 74 are Rapid Re-Housing Units, and 85 are Permanent Supportive Housing.

In addition to the facilities and housing described above, a variety of services exist to meet the needs of homeless individuals and families in Bucks County. BCHA will work continually to address the housing needs of the homeless in Bucks County and Bristol Township.

Helping homeless persons (especially chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth) make the transition to permanent housing and independent living, including shortening the period of time that individuals and families experience homelessness, facilitating access for homeless individuals and families to affordable housing units, and preventing individuals and families who were recently homeless from becoming homeless again

The CoC will continue to regularly analyzes the Annual Performance Reports for programs serving the homeless to assess performance and improve access to mainstream programs. Additionally, the CoC coordinates with publicly-funded systems of care through Discharge Policies to ensure individuals are not released into homelessness. These systems include: Health, Mental Health, Children and Youth, and

Corrections.

Homeless households are assessed upon entry into the homeless system to identify mainstream resources for which they are eligible. Support services in the form of case management is provided to individuals to apply for and obtain a variety of mainstream benefits. Furthermore, mainstream services are connected to these individuals or families to help compliment the services offered throughout the CoC.

Helping low-income individuals and families avoid becoming homeless, especially extremely low-income individuals and families and those who are: being discharged from publicly funded institutions and systems of care (such as health care facilities, mental health facilities, foster care and other youth facilities, and corrections programs and institutions); or, receiving assistance from public or private agencies that address housing, health, social services, employment, education, or youth needs.

Bristol Township, in partnership with the CoC, has taken steps in assisting these individuals in need of help to avoid homelessness. Persons identified to be at increased risk include: persons who are extremely low income, persons with disabilities, persons fleeing domestic violence, homeless persons being discharged from crisis units, hospitals and jails, unaccompanied youth and youth aging out of foster care. Prevention assistance is also primarily provided to persons who have already received notice that eviction proceedings have been started in court, since they are the households most likely to be evicted without assistance.

Bristol Township and community partners will provide services to identified persons and address their needs to avoid becoming homeless or returning to homelessness.

Discussion

Bristol Township will continue to work with the Bucks County CoC to address the needs of the homeless population in the Township.

In response to the COVID-19 crisis, the township will provide funding to the shelter for needed operational costs. As well, the Township will provide 3 month maximum emergency rental and mortgage assistance to low- and moderate-income households to prevent eviction due to loss of

income.

AP-75 Barriers to affordable housing – 91.220(j)

Introduction:

Bristol Township will continue to monitor and review public policies for discriminatory practices and or impacts on housing availability.

The Township

is committed to removing or reducing barriers to the development of affordable housing whenever possible. A variety of actions include, among others, to reduce the cost of housing to make it affordable:

- Provide developers with incentives for construction of affordable housing
- Refer developers of affordable housing to the Bucks County HOME funding program
- Restructuring of fees for construction tap ins, plan review, etc.
- Modifying development standards to increase density
- Introduction of mixed-use district to promote new residential housing units with office and retail uses

Actions it planned to remove or ameliorate the negative effects of public policies that serve as barriers to affordable housing such as land use controls, tax policies affecting land, zoning ordinances, building codes, fees and charges, growth limitations, and policies affecting the return on residential investment

Township staff will continue to review the rate at which residential real estate taxes escalate through cooperation with Bucks County and the Bristol Township School District. The county passed the Local Economic Revitalization Tax Assistance Act (“LERTA”), which encourages the development and expansion of commercial and industrial enterprises throughout the county. Through these efforts, the County and its municipalities hope to stabilize the tax base through increased economic activity. The LERTA program encourages the removal reuse or redevelopment of abandoned and/or dilapidated commercial and industrial property throughout Bucks County.

Due to the lack of available and vacant parcels, new residential development is unlikely, though there have been some inquiries on small parcels that are promising. The Township will continue to provide for the rehabilitation of the existing affordable housing stock as well as the removal of dilapidated and blighted structures.

Discussion:

The Township will continue to promote Fair Housing, including tenant rights, throughout the jurisdiction. Many jurisdictions have passed “source of income” regulations that prohibit housing

discrimination based on the source of income provided by the applicant/tenant. Staff will explore such an ordinance for the Township as part of the upcoming Consolidated Planning efforts.

AP-85 Other Actions – 91.220(k)

Introduction:

This section outlines actions planned by the Township to address the needs of underserved populations, maintain affordable housing, reduce lead based paint hazards, reduce the number of poverty level households as well as the improvement of the institutional delivery structure.

Actions planned to address obstacles to meeting underserved needs

Assistance to an Aging Population:

- Housing rehabilitation
- Provide for the Senior Center and its programs, especially as related to the COVID-19 pandemic
- Institution of LERTA to encourage the development of non-residential tax rate tables, reducing reliance on residential tax revenues by local government and the schools.

Assistance to Disabled and Disadvantaged:

- Support for the mentally and physically challenged through education, facilities, social services and the removal of architectural barriers.
- Support for Veteran's associations serving the needs of disabled veterans.

Actions planned to foster and maintain affordable housing

Due to a lack of available resources, the Township is not able to fund residential new construction. Our inclusion in the Bucks County HOME Consortium however not only increases the funding available to Bucks County, but also allows Bristol Township to encourage the development of affordable housing with that source of gap financing. The current Action Plan will provide funding to assist in the rehabilitation of existing owner-occupied units for low/moderate income families.

Furthermore, the Township works with developers and the local housing authority to avoid the displacement of current residents by not approving projects which require demolition of standard units or units that are capable of being rehabilitated to a standard condition without comparable replacement.

Actions planned to reduce lead-based paint hazards

Due in part to very limited funding and based on the Township's experience through the Owner-

Occupied Housing Rehabilitation Program, it is a policy of the Department to avoid disturbing paint. If lead based paint is detected and when feasible, efforts will be made to encapsulate the hazardous materials. Any home that is suspected of having lead-based paint will be referred to the Bucks County Lead-Based Paint Hazard Reduction Program. However, all homeowners with young children are provided with a HUD approved pamphlet which outlines the hazards and risks associated with lead-based paint. Problems that are above and beyond avoiding lead-based paint or encapsulating such problems are referred to Bucks County.

Actions planned to reduce the number of poverty-level families

Economic development and the alleviation of poverty, as well as the reduction of housing problems, go hand in hand. Bristol Township has been actively pursuing methods which will bring more employment opportunities to the Township. When assistance is provided by the Township in these endeavors, new and/or expanding enterprises are strongly encouraged to consider Township residents first in the hiring procedures and those persons who reside in low/moderate income areas of the Township or who may be considered low income. The Township has undertaken or will undertake the following activities:

- Opportunity Zone: Parts of Bristol Township are included in the Opportunity Zone and the Township expects to capitalize on these zones. We will work with any developer coming in to take advantage of this program.
- TCDI Report: The Bucks County Planning Commission, with a grant from the Delaware Valley Planning Commission, recently completed and Transportation and Community Development Initiative report, which helps the Township understand the economic impacts of the I-95/PA Turnpike interchange connection and develop an economic vision to reinvigorate the industrial and retail base of the Township.
- Department of Community and Economic Development: Bristol Township will continue to seek the support and grant assistance available through the Pennsylvania Department of Community and Economic Development.
- Enterprise Zone: Bristol Township has participated with the County of Bucks and the County Redevelopment Authority in identifying more than a 1,000 acres of Township land as an Enterprise Zone. The Enterprise Zone includes numerous former industrial areas which are now considered brownfield sites. In addition, several areas of the Township, including the nearly 100 acre property owned by the Coca Cola Company once vacant but has recently been the site of development and employment. Also in the process of development in the Keystone Industrial Park is the Action Manufacturing Company maintaining 175 jobs that would have been lost to Pennsylvania.
- LERTA: Bristol Township has partnered with Bucks County and the Bristol Township School

District to adopt a Local Economic Revitalization Tax Assistance Act (“LERTA”) which authorizes local taxing authorities to exempt from real estate taxation, for specific periods, the assessed valuation of improvements to industrial, commercial and other business property. Bristol Township’s LERTA will allow the increase in real estate taxes to be phased in over a five-year period (first year - 20% of the increase; second year -40%, etc.). These taxing bodies have successfully worked together to assign LERTA status to 631 commercial and industrial parcels.

Actions planned to develop institutional structure

The Bristol Township Office of Community Development will coordinate activities among the public and private agencies and organizations in the Township. This coordination will ensure that the goals and objectives outlined in the FY 2015-2019 Five Year Consolidated Plan will be effectively addressed by more than one agency. The staff of the Office of Community Development will facilitate and coordinate the linkage between these public and private partnerships and develop new partnership opportunities in the Township.

This coordination and collaboration between agencies is important to ensure that the needs of the residents of Bristol Township are being addressed. The main agencies that are involved in the implementation of the Plan, as well as additional financial resources that are available:

Public Agencies: Bristol Township Office of Community Development is responsible for administration of the CDBG program and Bucks County Housing Authority is responsible for administering Housing Choice Vouchers and public housing units

Non- Profit Agencies: There are several nonprofit agencies that serve low income households in the Township. The Township continued to collaborate with these agencies.

Private Sector: The private sector is a key collaborator in the services and programs associated with the Five-Year Consolidated Plan. The private sector brings additional financial resources and expertise that can be used to supplement existing services in the Township. Examples of these private sectors are; local lenders, affordable housing developers, business owners, community development organizations, healthcare organizations, and others.

The Township will continue to collaborate with local financial institutions, private housing developers,

local realtors, etc.

Actions planned to enhance coordination between public and private housing and social service agencies

As Federal funding allocations continue to decline it has become imperative that the Township work closely with Bucks County, the Bucks County Public Housing Authority and the Bucks County Continuum of Care. As such, Township staff will continue to work closely with these organization in an effort to improve agency coordination and reduce the duplication of programs and services offered across the county.

Discussion:

The Office of Community Development has the primary responsibility for monitoring the Township's Consolidated Plan and Annual Action Plan. The department maintains records on the progress toward meeting the goals and the statutory and regulatory compliance of each activity. Service area documentation is achieved through scheduling activities, drawdown of funds, and maintenance of budget spread sheets which indicate the dates of expenditures. Program modifications are considered if project activities are not able to be completed within the allowable time limits of the grant. The department is also responsible for the ongoing monitoring of any subrecipients for similar compliance.

The Township's responsibility is to ensure that Federal Funds are used in accordance with all program requirements, determining the adequacy of performance under subrecipient agreements; and taking appropriate action when performance problems arise. The Office of Community Development developed a "monitoring checklist" that is utilized when programs and activities are reviewed.

CDBG funded activities are monitored periodically, during the construction phase and a final inspection is performed which details the cost benefit and benefit to low/moderate income persons. During the onsite inspections, compliance with the local building and housing codes are reviewed. Copies of financial statements and audit reports are required and kept on file. For those activities, which trigger Davis Bacon Wage Rates, employee payrolls are required prior to payment and on-site employee interviews will be held.

Program Specific Requirements

AP-90 Program Specific Requirements – 91.220(I)(1,2,4)

Introduction:

Bristol Township will receive an annual allocation of CDBG funds in the amount of \$602,959 for FY 2019, and an additional \$374,312 in CARES Act funding. Since the Township receives a CDBG allocation, the questions below have been completed as applicable.

Under the FY 2019 CDBG Program, Bristol Township will receive a grant in the amount of \$602,959 plus \$374,312 in CARES Act funding and anticipates no program income for the year. The Township will budget \$120,591 and \$74,862 respectively for general administration. The balance of funds of \$482,369 and \$299,450 respectively will be allocated to activities which principally benefit low and moderate-income persons.

Community Development Block Grant Program (CDBG) Reference 24 CFR 91.220(I)(1)

Projects planned with all CDBG funds expected to be available during the year are identified in the Projects Table. The following identifies program income that is available for use that is included in projects to be carried out.

1. The total amount of program income that will have been received before the start of the next program year and that has not yet been reprogrammed	0
2. The amount of proceeds from section 108 loan guarantees that will be used during the year to address the priority needs and specific objectives identified in the grantee's strategic plan.	0
3. The amount of surplus funds from urban renewal settlements	0
4. The amount of any grant funds returned to the line of credit for which the planned use has not been included in a prior statement or plan	0
5. The amount of income from float-funded activities	0
Total Program Income:	0

Other CDBG Requirements

1. The amount of urgent need activities	0
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2. The estimated percentage of CDBG funds that will be used for activities that benefit persons of low and moderate income. Overall Benefit - A consecutive period of one, two or three years may be used to determine that a minimum overall benefit of 70% of CDBG funds is used to benefit persons of low and moderate income. Specify the years covered that include this Annual Action Plan.

100.00%

Attachments

Citizen Participation Plan

Each year, Bristol Township receives funding through the Department of Housing and Urban Development's (HUD) Community Development Block Grant (CDBG) program. As a requirement for receiving these funds, the Bristol Township Community Development Office (BTCDO) must complete several planning and reporting documents which must be submitted to HUD for approval. These reports include:

- Five Year Consolidated Plan (ConPlan)
- Assessment of Fair Housing (AFH)
- Annual Action Plan (AAP)
- Consolidated Annual Performance Evaluation Report (CAPER)
- Citizen Participation Plan
- Substantial Amendment to any of the above plans or reports (as defined below)

Citizen Participation must be an integral part of the planning process for the Consolidated Submission for all Community Planning and Development Programs (CPD). Much of the citizen participation process involves scheduling, publicizing and conducting public meetings and hearings. HUD, in its attempt to ensure adequate opportunity for participation by program beneficiaries, has prescribed minimum Citizen Participation, plan submission, performance reporting, and record maintenance requirements. These Citizen Participation Requirements are spelled out under 24 Code of Federal Regulations (CFR) 570.431(a) as well as 24 CFR Part 91.105.

The local citizen participation process generally includes a yearly series of well-advertised community/neighborhood public meetings held at the Bristol Township Municipal Building to review the Annual Action Plan and the Consolidated Annual Performance Evaluation Report as well any amendments or changes to these plans and/or the Assessment of Fair Housing (AFH). All meetings/hearings are advertised in accordance with applicable HUD, State and local regulations.

The Bristol Township Citizen Participation Plan has been structured to provide and encourage participation of Bristol Township citizens in the consolidated planning process. Its purpose is to

encourage all citizens including:

- Minorities and non-English speaking persons;
- Persons with mobility, visual or hearing impairments;
- Citizens who are of low and moderate income;
- Residents of areas affected by slums and blight in which CDBG funds are proposed to be used;
- Residents of low and moderate-income neighborhoods/areas as determined by the Township utilizing data provided by the Department of Housing and Urban Development with respect to Census data or more current data, when provided by the Department;
- Residents of assisted housing developments in conjunction with consultation with public housing authorities;
- Persons representing businesses, developers, community and faith-based organizations to participate in this planning process.

Public Notice

To encourage low and moderate-income persons to attend and participate, the annual community meetings/hearings are held in the early evening, Monday through Thursday at the Bristol Township Municipal Building. The BTCDO tries to avoid scheduling meetings on nights common with other major events which may require the participation of affected area residents and community leaders. When required, public hearings are conducted by the Township Council and are held at Township Council Chambers, 2501 Bath Road, Bristol, Pennsylvania 19007.

All public meetings/hearings shall be announced at least ten (10) calendar days before the date of the meeting. The BTCDO will utilize the following media to notify program beneficiaries regarding upcoming meetings.

- A. Newspaper advertisements, of no smaller than eight (8) point size, are published in adjudicated newspapers serving the Township (Bucks County Courier Times). Each publication is published at least ten (10) calendar days before the date of the meeting and/or publication of plans and reports.
- B. All public notices except those dealing with the environment are typically published in a newspaper of general circulation to specifically targeted residents of Township program areas.

- C. During a declared disaster, the requirement to publish the notice and summary in a newspaper of general circulation described above may be suspended. The Township shall at a minimum publish public notices on the Township's website and promote such advertisements and on social media as available. Furthermore, a shorter time period for notification may be allowable by HUD waivers. The timelines adopted will be those established by HUD at the time.

Public Meetings & Hearings

At least two public meetings/hearings must be held each year. One of which must be held as part of the Annual Action Plan and the Consolidated Plan & AFH (conducted once every five years) development process and a second public meeting must be held to provide information related to the CAPER which details the Township's performance towards meeting annual goals and objectives for the CDBG Program. Additional public meetings may be held at the discretion of Township staff.

During a declared disaster, public meetings and hearings may be held in an online capacity as allowed by HUD. In this situation, the ability for public comment must be provided.

The meetings/hearings will serve several purposes:

- Inform potential recipients of the functions of the BTCDO and its relationship to both Bristol Township Council and HUD;
- Explain the rules and regulations governing the CDBG program;
- Explain how the program relates to the needs of individuals/neighborhoods/non-profit organizations, etc.;
- Provide information regarding the amount of CDBG funds expected to become available;
- Explain the types of eligible activities;
- Discuss the status of previously funded activities;
- Determine citizen's perceived housing and non-housing community development needs and possible activities to address those needs;
- Review of performance and compliance issues;
- Receive comments, input and feedback related to each plan and/or report.

Publication of Plans & Reports

The BTCDO will publish, and make available to the public, the following plans and reports:

Annual Action Plan
2019

51

- Five Year Consolidated Plan
- Assessment of Fair Housing
- Annual Action Plan
- Consolidated Annual Performance Evaluation Report
- Citizen Participation Plan
- A Substantial Amendment to any of the above plans or reports (as defined below)

The publication is made to afford citizens an opportunity to examine the documents' contents, and to provide further opportunity for comments and citizen feedback regarding the proposed document.

A brief notice and summary of each plan and/or report is to be published in a newspaper of general circulation (Bucks County Courier Times). The publication will be printed a minimum of thirty (30) calendar days prior to it being considered for approval by the Township Council. The announcement shall also include instructions as to where citizens may find a full copy of the proposed plan and/or report for further review.

During a declared disaster, the requirement to publish the notice and summary in a newspaper of general circulation described above may be suspended. The Township shall at a minimum publish public notices on the Township's website and promote such advertisements on social media as available. Furthermore, a shorter time period for notification may be allowable by HUD waivers. The timelines adopted will be those established by HUD at the time.

Additionally, all plans and reports, listed above, shall be made available, in their entirety, for further review in the following manner: 1) a PDF copy available on Bristol Township's website and 2) hard copies shall be available for review at the Township Municipal Building. Furthermore, one (1) copy of the proposed plan and/or report will be made available, free of charge, for individuals who request them.

A period of no less than thirty (30) days shall be made available for public review and comment for the Consolidated Plan, Annual Action Plan, Citizen Participation Plan, the Assessment of Fair Housing, and any Substantial Amendments to these Plans. The Township shall make the Consolidated Annual Performance and Evaluation Report available for public comment for a minimum of fifteen (15) calendar days prior to finalization by Township staff.

During declared emergency situations, such as pandemics or natural disasters, the public comment period may be shortened, as described by HUD, to as little as five (5) days to accelerate the process. In these cases, public documents will be made available on the Township's website only.

Amendments to Plans & Reports

In the event the Township needs to make changes to the Consolidated Plan and/or Annual Action Plan, the Township must determine the nature of the required changes and in such cases where the changes are considered substantial, the Township must produce what HUD refers to as a Substantial Amendment to the Consolidated Plan and/or Annual Action Plan.

The Substantial Amendment process will occur when the following program changes exist:

To the Consolidated Plan:

- There is a change to the Priority Needs identified in the Strategic Plan;
- There is a change to the Goals and Objectives identified in the Strategic Plan;
- There is a change to the Target Geographies/Areas identified in the Strategic Plan;
- New entitlement grants are awarded to the Township.

To the Annual Action Plan:

- There is a change to the Annual Goals and Objectives identified in the Action Plan;
- There is a change to the Target Geographies/Areas identified in the Action Plan;
- When an Project previously described in the Action Plan is canceled;
- Creation of a new Project not previously described in the Action Plan;
- The funding allocated to an existing Project is adjusted by 20%, or more, of the initial funding

- amount;
- Revision to an existing project which changes the purpose, scope, location, or beneficiaries of the program.

To the Assessment of Fair Housing:

- A material change in circumstances within the jurisdiction that affects the information on which the AFH is based, to the extent that the analysis, the fair housing contributing factors, no longer reflect actual circumstances;
- There is a change to the Priorities and Goals identified in the Assessment

All other changes will be considered revisions (non-substantial) and will be accomplished administratively by the BTCDO.

Prior to amending a Consolidated Plan and/or Annual Action Plan, Township will provide citizens with reasonable notice of, and opportunity to comment on, proposed program changes in its use of Action Plan funds for a project (either funded in whole or in part). This involves a 30-day review period. A summary of citizen comments or views and the reasons any such comments or views were not accepted will be attached to amendments of the Plan. The Township will consider any such comments, and if the grantee deems appropriate, modify the changes.

Citizen Comments & Feedback

During all public meetings and hearings citizens are encouraged to comment or submit written comments and feedback to the BTCDO concerning the proposed plans, reports and the performance of the BTCDO and/or other Township departments and entities under contract with the Township for the implementation of program related activities. All comments, written and oral, will be accepted and included as part of the citizen participation records for the associated plan and/or report.

Citizens may also provide written comments and feedback via mail addressed to the following:

Bristol Township, Community Development Department, 2501 Bath Road, Bristol, PA 19007.

Comments outside of the public hearing process must be submitted in writing to the Township either by email or mail.

When responses are warranted, written comments/complaints regarding any facet of the CDBG Program or its implementation in Bristol Township are answered in writing. Unless specific circumstances exist, which prevent immediate action, written replies are mailed within fifteen (15) working days, where practical, after receipt of the written comment/complaint (or oral comment/complaint if made during a public meeting/hearing).

Accessibility of Meetings & Documents

Bilingual Information

With at least one business day of advanced notice Spanish translators will be provided at public meetings. Public notices will be published in Spanish in a Spanish Language newspaper. Translation services will also be provided for persons who may need assistance reviewing printed documents, reports and/or other related materials. Citizens may contact the Township Offices at (215) 785-0500 at least 24 hours in advance to request such services.

Hearing Impaired

Persons with hearing impairments may utilize the hearing-impaired phone assistance by contacting TDD 215-785-4224.

American With Disabilities Act (ADA) - 1973 Rehabilitation Act

With at least one business day of advanced notice, the department shall provide assistance and special arrangements for those who are disabled in order to provide information and services concerning federally funded programs. Proposed CDBG plans are placed on the Township's website. All visual aids used in the Township council chambers are projected on to two large screens to help all sighted people to see them better. All public meetings are held in buildings which are accessible to the handicapped. Citizens may contact the Township Office at (215) 785-0500 at least 24 hours in advance to request assistance services.

Additional Citizen Participation Activities

Consultation of Area Agencies

Under 24 CFR.91.100 (a)(1) as part of the Consolidated Plan and Assessment of Fair Housing development processes, the BTCDO shall consult with other public and private agencies that provide assisted housing, health services, and social services, including those focusing on services to children, elderly persons, persons with disabilities, persons with HIV/AIDS and their families, and homeless persons. The BTCDO shall also consult with community-based and regionally-based organizations that represent protected class members and organizations that enforce fair housing laws when preparing both the Consolidated Plan and the AFH including participants in the Fair Housing Assistance Program, Fair Housing organizations, nonprofit organizations that receive funding under the Fair Housing Initiative Program and other public and private fair housing service agencies, to the extent that such entities operate within the jurisdiction. Additionally, the consultation process will include consultation with regional government agencies in addition to adjacent units of general local government and local government agencies. This includes local government agencies with metropolitan-wide planning and transportation responsibilities, partially for problems and solutions that go beyond the BTCDO jurisdiction.

Under 24 CFR.91.100 (c)(1) as part of the Consolidated Plan and Assessment of Fair Housing development processes, the BTCDO shall also consult with public housing authorities (PHAs) operating within the jurisdiction. This consultation will continue to consider public housing needs, planned programs and activities under the Consolidated Plan as well as strategies for affirmatively furthering fair housing specifically to address any fair housing issues in the public housing and Housing Choice Voucher programs. The consultation process requires the BTCDO to address the needs of public housing and, where necessary, the manner in which it will provide financial or other assistance to a troubled PHA to improve the PHA's operations and remove the designation of troubled.

Public Access to Records

The BTCDO maintains copies of all plans, reports and amendments for each program year. Additionally, the BTCDO maintains a library of rules, regulations, and records required by HUD and the Township. This library of records includes records related not only to the plans and reports but also all programmatic documents, meeting notes, written comments received, environmental reviews, office publications, etc. This information is available for public review

and copying during normal business hours, provided that the requested document is public information pursuant to applicable federal, state, and local laws. During normal working hours (8:30 a.m. to 5:00 p.m.), the BTCDO shall make available for citizen review upon request the following documents:

- All program information materials
- Copies of regulations and information about the Consolidated Plan and/or other programs administered by the Department of Housing and Urban Development and covered by the Consolidated Plan
- Environmental review materials
- Citizen Participation Plan
- Prior applications, performance reports, and other public reports
- CDBG Project applications from project sponsors
- Written comments and/or complaints and the Township's response as appropriate
- Fair Housing Assessment
- Procurement procedures (contracting)
- Rehabilitation Program Guidelines

Public Access to Data Sources

As part of the Consolidated Plan and the Assessment of Fair Housing, the BTCDO will utilize HUD provided data sets and mapping tools. When applicable, the BTCDO will reference these data sets in plans and reports as well as provide a link to such data sources within the draft documents. This shall provide citizens and community stakeholders the opportunity to review the data utilized to set priority needs, goals and objectives.

Residents of Public and Assisted Housing

Residents of public and assisted housing are stake holders with HUD in that they receive rental assistance from HUD. These residents are therefore encouraged to participate in the planning and execution of the CDBG Program, because they are also eligible to benefit from the expenditure of CDBG funds.

Environmental Review

In certain instances, the participation consists of publication of specific actions/findings, including a description of the project, its locations, submission of relevant data to applicable local, state and federal agencies for review and comment, and the Community Development Administrator's approval of federal environmental findings relating to the Request for Release of funds from HUD.

Miscellaneous and Informal Meetings

The BTCDO staff attends and/or conducts miscellaneous meetings and hearings throughout the program year. While many of these meetings are project specific, many others are held at the request of individuals, groups, other Township departments or Township Council members for the purpose of disseminating or receiving information about the CDBG Program in general, or about issues of specific interest. These meetings generally are not advertised, since the meeting is attended by the parties requesting the meeting, BTCDO staff and various other invited participants.

The BTCDO maintains an Initial Contact/Proposed Project file and Citizen Comment/Complaint file. These mechanisms allow the BTCDO to record correspondence with individuals and/or organizations that submit proposals or make comments or requests of the BTCDO during the program year. Requests, proposals and questions received during the program year are researched and discussed during applicable local public meetings and during the planning of subsequent programs. This information is on file in the BTCDO and is processed at a time appropriate to the nature of the specific contact.

Technical Assistance

Pursuant to the Housing and Community Development Act of 1974 (as amended) and its implementing federal regulations, the BTCDO shall provide technical assistance when requested by public and private agencies, non-profit public benefit organizations and individuals for the purpose of assisting the agency or individual in developing its proposal for consideration of Consolidated Plan funding, provided the proposal is eligible and qualifies per HUD regulations.

Technical assistance shall include but not be limited to:

- Assisting in better defining the proposal by outlining specific information the applicant(s) should gather and include in their proposal;
- Referring applicant to other public and private agencies which may help gather or provide needed information and/or technical assistance;
- Developing preliminary cost estimates for the proposal;
- Preparing very basic conceptual descriptions and/or drawing of the proposal;
- Providing for final review of the proposal for completeness prior to its official submission to the BTCDO for consideration for funding.

In addition to the technical assistance for development of proposals, the BTCDO will continue providing assistance for implementation; administration and monitoring of CDBG funded projects. This assistance includes such things as:

- Obtaining environmental clearance for projects;
- In certain instances (depending on staff workload), implementing activities on behalf of the subrecipient;
- Providing guidance in the solicitation and contracting process for hiring a consultant to ensure compliance with applicable local, state and federal regulations;
- Assisting in reviewing and monitoring consultant's work;
- Providing guidance in bid advertisement for construction to ensure compliance with all applicable requirements;
- Assisting in monitoring contractors and subcontractors during and after construction for compliance with HUD regulations;
- Acting as mediator in disputes between subrecipient and contractor;
- Providing CDBG application workshops for nonprofit organizations.

Plans to Minimize Displacement of Persons and to Assist any Persons Displaced

The Township, in accordance with the Uniform Relocation Assistance and real Property Acquisition Policies Act of 1970, the 1988 Common Rule, and the 1989 Barney Frank Act, will provide relocation assistance, as described in 24 CFR 570.606(b)(2), to each low/moderate-income household displaced by the demolition of housing or by the conversion of a low/moderate-income dwelling to another use as a direct result of assisted activities.

Consistent with the goals and objectives of activities assisted under the Act, the BTCDO will include, but not be limited to, the following steps to minimize the displacement of persons from their homes:

1. Avoid, as much as possible, Action Plan funded projects which permanently displace persons from their homes.
2. Fully advise any residents who may be displaced of their rights and options for relocation benefits as required by federal regulations.
3. Assist displaced residents in filling out any required forms for assistance or to appeal Township decisions regarding displacement or the level of relocation benefits.

Complaints

Citizens wishing to submit a complaint regarding any portion of the citizen participation process and/or development of the CDBG application, Consolidated Plan, Annual Action Plan, CAPER or any Substantial Amendment to these plans, may do so according to the following procedure:

1. Formal complaints should be submitted in writing to:

Bristol Township
Community Development Department
Attn: Director
2501 Bath Road
Bristol, Pennsylvania 19007

The Community Development Administrator will refer the complaint to the appropriate Township staff member for written response regarding the complaint. The written response will be mailed within fifteen (15) business days of the receipt of the complaint.

2. If the complainant is not satisfied with the Community Development Administrator's response, the complainant can appeal the decision to the Township Manager. The Township Manager will have thirty business (30) days to take further action as deemed necessary to address the complainant's concerns.

3. If the complainant is not satisfied with the response of the Township Manager a formal complaint may be addressed to the Township Manager and the Township Council.

4. If complainants are not satisfied with the decision of the Township Council, a written complaint may be submitted to the HUD Regional Office at:

Philadelphia Regional Office

The Wanamaker Building

100 Penn Square East

Philadelphia, PA 19107-3380