

The City of Bristol is a participating entitlement jurisdiction with the U.S. Department of Housing and Urban Development in receiving Community Development Block Grants (CDBG). As such, citizens, public agencies and other interested parties are guaranteed a role in the development and review of plans and performance reports and, further, shall have access to certain records and technical assistance. The Citizen Participation Plan sets forth those procedures.

Encouragement of Citizen Participation

The Plan will encourage:

- Citizens, public agencies and other interested parties to participate in the development and review of the Consolidated Plan and its amendments, Annual Plan, Environmental Review Record and Consolidated Annual Performance and Evaluation Report.
- Participation by low and moderate income persons living in slum and blighted areas and in areas where CDBG funds are proposed to be used and residents of predominantly low and moderate income neighborhoods.
- Participation of all citizens of the City, including minorities and non-English speaking persons, as well as persons with disabilities.
- In conjunction with the Bristol Housing Authority (Authority), participation of residents in public and assisted housing developments in the process of developing and implementing the consolidated plan, along with other low income residents of targeted revitalization areas in which the developments are located. The City will provide information to the Authority about its Consolidated Plan activities related to its developments so that the Authority can make this information available at the annual public hearing required under the Comprehensive Gant Program.
- The Mayor and Council to designate target areas within the City which have 50% or more low to moderate income individuals.

Responding to Citizen Comments, Views and Objections

A. Program Recommendations, Requests and Objections

- Written comments, requests, and/or inquiries which require a response to general information and/or clarification of the CDBG program can be handled by staff of Community Planning and Development. The response time shall be within fifteen (15) working days of the receipt of the written comment, request and/or inquiry, where practicable.
- All written responses to written recommendations, requests and/or objections shall state reasons for action taken or, in the case of staff response, shall make specific reference to pertinent sections of CDBG legislation.
- Whenever practical, responses should be made prior to the end of the comment period as stated in the legal notice on the development of the Consolidated Plan, Annual Plan, Environmental Review Record and/or Consolidated Annual Performance and Evaluation Report for which the written recommendation, request and/or objection was offered.

Objections may also be made, in writing, to HUD. HUD will consider objections only on the following grounds:

1. The applicant's description of needs and objectives is plainly inconsistent with available facts and data; or

2. The activities to be undertaken are plainly inappropriate to meeting the needs and objectives identified by the applicant; or
3. The applicant does not comply with the requirements of HUD or other applicable laws; or
4. The application proposes activities which are ineligible.

Objections shall include identification and documentation of requirements not met and where data is objected to, new data shall be offered. Objections to a particular application should be submitted within thirty (30) days of the publication of the combined Notice of Release of Funds and Finding of No Significant Impact.

Changes made for COVID-19 and CARES Act

Virtual hearings can be used, real-time responses and accommodation for persons with disabilities and/or with limited English proficiency will be made available to the greatest extent possible. Also, the virtual hearing method will only be used in lieu of in-person hearing if national or local health authorities recommend social distancing and limit public gatherings for public health reasons.

For CDBG-CV funding under PY 2019, the Coronavirus Aid, Relief, and Economic Security Act or CARES Act, and/or any additional funding granted in response to COVID-19 health crisis, the City may provide a 5-day notice/comment period of a substantial amendment beginning May 9, 2020 as allowed under a HUD waiver. This includes any new activities proposed. A public hearing is not required but documentation relative to substantial amendment activity planning applies.

Availability of Records

- A. The City will provide the Consolidated Plans, as adopted, substantial amendments, and the performance reports will be available to the public, including the availability of materials in a form accessible to persons with disabilities, non-English speaking residents, upon request where practical.
1. The City shall maintain records pertaining to the CDBG Program in City Hall for a period of five years.
 2. Documents on file shall include:
 - All key documents, including, letters of approval, grant agreements, the citizen participation file, performance reports, evaluation reports, Letters of Credit, other reports as required.
 - CDBG regulations and issuances governing the program.
 - Other important program requirements such as contracting procedures, environmental policies, fair housing and other equal opportunity requirements and relocation provisions.
 3. Documents on file with the Department of Finance shall include:
 - All financial data indicating expenditures of CDBG funds.
 - All check request and requisition forms.
 4. All records shall be available for inspection between the hours of 8:30 a.m. and 4:30 p.m. during normal working days.
 5. Requests for copies of any available records shall be made, in writing, pursuant to established City policy. The current fee schedule for copying records shall be applicable.

Administrative Updates

Changes to the Consolidated Plan that do not meet the criteria for standard or substantial amendments and do not require citizen participation are defined as administrative updates. Examples of administrative updates include grammatical or structural edits that do not substantially change the scope or meaning of activity; and changes in the coding or eligibility determination of a project that

does not change the scope, location, or beneficiaries.

Activities Exempt from Substantial Amendment Citizen Participation Requirements

Disaster / Emergency Events

It may be necessary to expedite substantial amendments to the Consolidated Plan in the event of a declared disaster or emergency. There are three types of disasters/emergency events that may necessitate an expedited substantial amendment including (1) Man-Made-disasters, (2) Natural disasters, and (3) Terrorism. Man-made disasters can include chemical spills, mass rioting, power outages, dam failure, plant explosions, etc. Natural disasters can include earthquakes, hurricanes, tornadoes, wild fires, flooding and public health issues such as wide-spread disease such as the recent coronavirus disease 2019 (COVID-19). Terrorism events include bomb threats, biochemical attacks like the spread of anthrax, or cyber-attacks like hacking, phishing, and virus distribution, etc.

These expedited substantial amendments may include funding new activities and/or the reprogramming of funds including canceling activities to meet needs resulting from a declared disaster or emergency. Therefore, the City of Bristol and/or participating cities may utilize CDBG or HOME funds to meet these needs with a 5-day public comment period instead of a 30-day public comment period, which is otherwise required for substantial amendments. For CDBG-CV funding under PY 2019 and, and the Coronavirus Aid, Relief, and Economic Security Act or CARES Act, and/or any additional funding granted in response to COVID-19 health crisis, the city may provide a 5-day notice/comment period of a substantial amendment beginning May 9, 2020 as allowed under a HUD waiver. This includes any new activities proposed. A public hearing is not required but documentation relative to substantial amendment activity planning applies; however, the City will publish how the CDBG-CV funding has or will be used on the City of Bristol website at www.bristolva.org

With respect to a declared disaster, the City may elect to use CDBG, HOME, or State funds to address needs not provided for by the Federal Emergency Management Agency (FEMA) and the Small Business Administration (SBA), or other disaster relief efforts. Funding for disaster relief may not duplicate other efforts undertaken by federal, state or local sources unless allowed by the federal government. Potential eligible uses of funds are those that are included in this Citizen Participation Plan, the Consolidated Plan, or any other CDBG, HOME, or State eligible use. HUD may provide new guidance on eligible uses in which the City will comply with and may utilize as well.

All eligible CDBG activities, including those to address declared disasters or emergencies, must meet one of three national objectives which are: (1) Benefit to low- and moderate-income (LMI) persons; (2) Aid in the prevention of slums or blight; and (3) Meet a need having a particular urgency (referred to urgent need). The City may carryout eligible CDBG activities to meet needs resulting from declared disasters or emergencies under any one of the three national objectives.

Responding to the COVID-19 Pandemic

The City may reprogram up to 50% of PY 2019 and/or PY 2020 and future CDBG, HOME, and State funding to respond to the COVID-19 pandemic. Funding for activities that have required in-person interaction including, but not limited to, housing rehabilitation assistance, and a variety of community services may be reprogrammed into activities that allow for social distancing such as grab and go or home-delivered meal services, online programming for a variety of clientele including, but not limited to, youth and senior citizens, and various business and microenterprise assistance identified below to respond to or recover from the effects of the COVID-19 pandemic. Please see below for other possible

activities that may be funded. Any other possible eligible activity not included below may also be considered. The City will coordinate with an informal committee of subject matter experts before undertaking any activity to respond to the COVID-19 pandemic.

Potential eligible CDBG Activities that may be undertaken to support the COVID-19 response include, but are not limited to:

- Building and Improvements, including Public Facilities such as constructing testing and diagnosis, or treatment facility; rehabilitation of a community facility to establish an infectious disease treatment clinic; acquisition and rehabilitation, or construction of a group living facility that may be used to centralize patients undergoing treatment; rehabilitation of a commercial building or closed school building to establish an infectious disease treatment clinic, e.g. by replacing the HVAC system; acquisition and rehabilitation of a motel or hotel building to expand the capacity of hospitals to accommodate isolation of patients during recovery; or to make interim improvements to private properties to enable an individual patient to remain quarantined on a temporary basis;
- Assistance to Businesses, including Special Economic Development Activities such as providing grants or loans to support new business expansion to create jobs and manufacture medical supplies necessary to respond to infectious disease; avoid job loss caused by business closures related to social distancing by providing short-term working capital assistance to small businesses to enable retention of jobs held by low- and moderate income persons; or to provide technical assistance, grants, loans, and other financial assistance to establish, stabilize, and expand microenterprises that provide medical, food delivery, cleaning, and other services to support home health and quarantine;
- Public Services such as job training to expand the pool of health care workers and technicians that are available to treat a disease within a community; provide testing, diagnosis or other services at a fixed or mobile location; increase the capacity and availability of targeted health services for infectious disease response within existing facilities; provide equipment, supplies, and materials necessary to carry out a public service; deliver meals on wheels to quarantined individuals that need to maintain social distancing due to medical vulnerabilities;
- Planning, Capacity Building, and Technical Assistance such as gathering data and developing non-project specific emergency infectious disease response plans; and
- Any other activity allowed under current CDBG regulations, including fund administration.

Urgent Needs

It may be necessary to amend the Consolidated Plan in the event of an emergency such as a natural disaster. These amendments may include funding new activities and / or the reprogramming of funds including canceling activities to meet community development needs that have a particular urgency. Therefore, the City of Bristol, acting through the Community Development Department may utilize its CDBG or HOME funds to meet an urgent need without the normal public comment period, which is otherwise required for substantial amendments.

To comply with the national objective of meeting community development needs having a particular

urgency, an activity will alleviate existing conditions that the City of Bristol certifies:

- Pose a serious and immediate threat to the health and welfare of the community;
- Are of recent origin or recently became urgent;
- The City and the Community Development Department are unable to finance the activity on its own; and,
- Other resources of funding are not available to carry out the activity.

A condition will generally be considered to be of recent origin if it is developed or became critical within eighteen (18) months preceding the Community Development Department's certification;

If HUD allows, such as through a waiver, activities under the urgent need national objective to be funded without the requirement that the City is unable to finance the activity on its own and other resources of funding are not available to carry out the activity, the Community Development Department will only certify that the activity poses a serious and immediate threat to the health and welfare of the community and is of recent origin or recently became urgent.

Urgent need activities may include, but not limited to, the following:

- Clearance of debris;
- Provision of extra security patrols;
- Demolition, clearance and/or reconstruction of damaged property posing an immediate threat to public safety;
- Emergency reconstruction of essential water, sewer, electrical, medical, and telephone facilities;
- Emergency repair of streets and sidewalks; and,
- Providing a variety of relief services to individuals.