

CITY OF MILFORD, CONNECTICUT

Community Development Block Grant (CDBG)

Citizen Participation Plan

April 2020

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INTRODUCTION

As an Entitlement Community the City of Milford is eligible to receive an annual allocation of Community Development Block Grant (CDBG) from the U.S. Department of Housing and Urban Development (HUD) ~~through its Department of Community Planning and Development as~~ authorized pursuant to Title I of the Housing and Community Development Act of 1974, ~~as amended.~~ As a condition of its CDBG award and participation in the program, the ~~City~~ City of Milford prepares a ~~prepare and~~ Citizen Participation Plan ~~to~~ abide by its public participation ~~responsibility and~~ ~~adopt~~ the ~~This plan's~~ City's policies and procedures set forth under 24 CFR, Part 91, Subpart B, Citizen Participation and Consultation (§91.105), and Subpart F, Amendments to the Consolidated Plan (§91.505), as required under 24 CFR, Part 91, Subpart B, Citizen Participation and Consultation (§91.105), and Subpart F, Amendments to the Consolidated Plan (§91.505).

The City of Milford Department of Economic & Community Development (ECD) is responsible for ~~the~~ administration of the CDBG Program. ~~including preparation of the CHAS To accomplish accomplish this this requirements~~ ~~responsibility the city shall adopt and abide by its Citizen Participation Plan. This~~ Citizen Participation Plan ~~shall~~ ~~it publish~~ guide and coordinate a public participation process to develop community and housing goals and objectives; notice ~~of the public participation process.~~ ~~es notices of~~ comment periods and reasonable access to public hearings, information, and records related to the grantee's use of CDBG funds. ~~In order to achieve the greatest gain~~ ~~citizen input on a geographic basis within the community, the City of Milford Community Development Department there will be a series of~~ hold at least two public hearings a year. In addition, ~~t~~ ~~development needs~~ he City of Milford ~~Community Development Department will~~ encourage neighboring municipalities, state government, staff, local agencies ~~—A—~~ ~~In addition, activities of the Department of Community Development will~~ solicit input and consult ~~with~~ and organizations to consult on a local and pa regional approach to matters related to housing, the economy, community planning to benefit ice ~~individuals~~ experiencing adversity, particularly households whose incomes are at, or less than, the 80% area median income, are ~~which provide services to or~~ disabled, have special needs, and at risk of homelessness. ~~This effort will be~~

~~coordinated through the Social Service Network which meets on a monthly basis throughout the year.~~

~~To oversee and guide the Plan process, the Housing Partnership in cooperation with the Milford Community Development Department, with the Mayor, will coordinate the citizen participation process. Its membership provides a broad based vehicle for community input and representation.~~

~~Outlined within the The Citizen Participation Plan outlines are the sAs needed, there may also be meetings on a particular subject such as public service needs or infrastructure needs. pecific measures forregar_ding ppublic comment, public hearing(s) and public review of HUD required reports such as . These requirements pertain to such HUD required reports as on the Five-Year Consolidated Housing and Community Development Strategic Plan (the Plan); process and the Annual Action Plan CDBG Program activity allocations (the Plan); the Environmental Review Record (ERR);, the Consolidated Annual Performance Evaluation Report (CAPER);, the review of program performance and performance; and activities as well as housing goals and policiesany substantial amendments to the aforementioned.~~

CITIZEN PARTICIPATION PLAN

A Citizen Participation Plan outlines specific steps the City will take to encourage and assure reasonable opportunity for public participation, comment and attendance at public hearing(s) in the development of the an Affirmatively Fair Housing Plan (AFH), any revisions to the AFH, goals and objectives for the Five-Year Strategic Consolidated Housing and Community Development Plan (Plan), CDBG allocations in the Annual Action Plan (AAP); any substantial amendment to the consolidated plan, the Consolidated Annual Performance Evaluation Report (CAPER) and the HUD performance review of the performance report; and the Environmental Review Record (ERR).

The City shall encourage the participation of local and regional institutions, Continuums of Care, and other organizations (including businesses, developers, nonprofit organizations, philanthropic organizations, and community-based and faith-based organizations) in the process of developing and implementing the AFH and the consolidated plan. The City shall encourage the participation of public and private organizations. Commencing with consolidated plans submitted on or after January 1, 2018, such consultations shall include broadband internet service providers, organizations engaged in narrowing the digital divide, agencies whose primary responsibilities

include the management of flood prone areas, public land or water resources, and emergency management agencies in the process of developing the consolidated plan.

The City shall encourage, in conjunction with consultation with public housing agencies, the participation of residents of public and assisted housing developments (including any resident advisory boards, resident councils, and resident management corporations) in the process of developing and implementing the AFH and the consolidated plan, along with other low-income residents of targeted revitalization areas in which the developments are located. The City shall make an effort to provide information to the PHA about the AFH, AFFH strategy, and consolidated plan activities related to its developments and surrounding communities so that the PHA can make this information available at the annual public hearing(s) required for the PHA Plan.

The City shall take these appropriate actions to encourage the participation of all its citizens, including minorities and non-English speaking persons. ~~The City shall adopt and abide by its Citizen Participation Plan. The City shall make available copies of its Citizen Participation Plan through the Community Development Department, the Main Branch of the Milford Public Library and the Department of the City Clerk. The City shall provide the public with annual notice of the availability of its Citizen Participation Plan.~~ The City shall periodically review its Citizen Participation Plan annually and update, if as necessary and appropriate, ~~its Citizen Participation Plan annually.~~ ~~The City shall notify the public of any proposed changes to the Citizen Participation Plan with a public comment period. in accordance with the procedures outlined above, prior to implementation.~~ Any person with a disability or a non-English speaking individual requesting assistance to review this Citizen Participation Plan or other documents may contact the Department of Economic & Community ~~and Economic~~ Development.

PUBLIC NOTICE FOR COMMENT, HEARING(S) AND REVIEW

To encourage and solicit public participation and community involvement, the Department of Economic & Community Development will publish notice(s) for comment and hearing(s) in adherence to the Title 24, Part 91, Subpart B, Citizen Participation and Consultation (§91.105), and Subpart F, Amendments to the Consolidated Plan (§91.505) as follows:

Notice of Fifteen (15) Day's is required for all public hearing(s) and comment on the Consolidated Annual Performance Report (CAPER) and Environmental Review Report (ERR/RROF). Notices for

the ERR/RROF will vary depending on environmental findings as detailed under the Environmental Review section.

Notice of Thirty (30) Day's is required for the Citizen Participation Plan, a Five-Year Consolidated Housing and Community Development Plan and/or Annual Action Plan, an Affirmatively Fair Housing Plan, and Substantial Amendments a Plan.

Notice of Hearing(s) the City is required to provide at least two (2) public hearings conducted at a minimum of two different stages of the program year and one (1) hearing is held before a proposed Plan or AAP. The hearings will be held at times and locations convenient to encourage and accommodate all residents and interested parties. Together the hearings will give opportunity to obtain and respond to residents' views, proposals and questions on housing and community development needs, development of proposed activities, proposed strategies and actions for affirmatively furthering fair housing consistent with the AFH, and program performance, prior to approval by the Board of Alderman.

All notices will contain the purpose, the comment period, the time and location of a hearing, and a instructions information how to request accommodations for persons with disabilities and non-English-speaking persons. For example, the Department of Economic & Community Development will arrange for the services of a translator at a hearing if requested or it anticipates a significant number of the attendees are non-English speaking persons.

All notices will begin on the date published, and/or distributed, and will be available to the public one or more of the following ways; published in the local or regional newspaper; distributed to local agencies, officials and residents by email and/or a social media platform; posted to City of Milford, Economic & Community Development webpage <http://www.ci.milford.ct.us/economic-and-community-development/pages/community-development-block-grant-cdbg-program> ; displayed at ~~to all in a formal accessible to persons with disabilities,~~ the Milford Public Library and/or the Office of City Clerk, if circumstances allow, and the- original copy is available for public review in ~~to review provides details on all grant proposals; receipt of activity and project fund allocations and projected program income, HUD the year-end performance evaluation; and environmental reports; review project outcomes as well as has at~~ the Department of Economic & Community Development at all times. Written comments will be accepted in the Department of Economic & Community Development, Parsons Government Center, 70 West River Street 2nd Fl, Milford, CT. All written comments and views of citizens, accepted or rejected, and verbal comments expressed during a public hearing will be reflected in the hearing minutes are included

in the final document and submitted to HUD, Department of Community Planning and Development (CPD).

The participation of residents of public and assisted housing developments, local and regional institutions, Continuums of Care, and other organizations (including businesses, developers, nonprofit organizations, philanthropic organizations, and community-based and faith-based organizations) are the basis of the Milford Ordinance Chapter 18. Planning, Article XV. Milford ~~To oversee and guide the Plan proces~~Housing Partnership formed in 1990 follows the State of Connecticut, Housing Partnership program Section 8-336f of the General Statutes for the purpose of establishing an advisory board and/or non-profit arm to imitate ways to expand the housing choices that are affordable and improve existing homes for residents and new households of mixed incomes. The Committee consists of ten (10) volunteer ~~membersare~~ with a broad range of community, professional, housing knowledge and local regulatory expertise. In addition, the Committee's involvement and ~~_consultation~~ with the Department of Economic & Community Development and the CDBG Administrator constitutes public participation during the ~~coordinate the citizen participation process and r~~citizen participation process during the Plan and AAP, reviews the annual grant application, is invited to hear comment at a hearing during the CAPER comment period, and other issues, including affordable housing development.

Unless otherwise directed by HUD through a regulatory waiver due to "stay at home" order or restrictions on the size of public gatherings mandated in response to a health concern and its potential effects on the public, for example the 2020 COVID-19 Pandemic, the City will abide by the Citizen Participation Plan public comment period or public hearing herein. When directed by HUD, the grantee determines that a shorten the public comment period or opt for a "virtual" hearing, accept written comment by email or other arrangements, will constitute a reasonable opportunity to participate under such aforementioned circumstances. In addition to the document(s) mentioned in this Citizen Participation Plan, all related CDBG reports program applications, forms, guidelines, and schedules will be available for review and use by recipients, when possible, on the City of Milford, Economic & Community Development webpage.

CONSOLIDATED PLAN (Plan), ANNUAL ACTION PLAN (AAP) & AFFIRMATIVELY FURTHERING HOUSING PLAN (AFH)

The Department of Economic & Community Development will make citizen comment, research, data and other supplemental information incorporated into its Plan/AAP/AFH available to its residents, public agencies, and other interested parties. The Department of Economic & Community Development and the [Housing Partnership](#) Committee will consider comment and prioritize goals and objectives [set forth in the Five-Year Strategic Consolidated](#) Housing and Community Development [Plan](#) (Plan) when making recommendation for CDBG funds. The proposed Plan will be notice for public comment prior to City approval by the Board of Alderman.

ENVIRONMENTAL REVIEW RECORD (ERR)

Office of Housing and Urban Development (HUD) requires the City to perform an Environmental Review according to federal regulation Title 24, Part 58, Environmental Review Procedures for Entities Assuming HUD Environmental Responsibilities to comply with Federal laws and authorities. The Mayor of Milford, as the responsible agency entity, certifies an environmental review on CDBG activities is completed prior to the expenditure of federal funds. A Notice of Intent [to Request Release of Funding](#) (NOI/RROF) includes a public comment period by activity environmental impact. Depending on the results of the environmental review the Department of Economic & Community Development may combine one or more environmental review result in the same notice.

FINDING OF NO SIGNIFICANT IMPACT (FONSI) / REQUEST FOR RELEASE OF FUNDS (RROF)

The Department of Economic & Community Development must complete an environmental review record (ERR) on each proposed activity in the HUD Environmental Review Online System (HEROS). Activity(s) found exempt require no further review, categorically excluded activities are subject further review under 58.5, such as housing rehabilitation, large-scale demolition, sewer or construction and may require an Environmental Impact Statement Determination (EIS) 58.37. If no additional review(s) are required, the City certifies the final environmental review, a Finding of No Significant Impact (FONSI) and the Request for Release of Funds (RROF) a fifteen (15) day public comment period will be noticed.

ENVIRONMENTAL ASSESSMENT (EA) / NOTICE OF INTENT (NOI)

Upon further review of an activity out of compliance with any other regulations, an Environmental Assessment (EA) 58.36 may be required. The Department of Economic &

Community Development may hire a consultant to complete the necessary EA, after which it can combine the results of the EA with its NOI/RROF, otherwise an additional seven (7) day public comment period for the EA is required.

Once the notice period ends the environmental review is submitted into HEROS and to the environmental officer via the HEROS and the HUD 7015.15 is sent to the Hartford CPD Office. Timing the completion of the ERR to coordinated with the Plan due date to HUD ensures the environmental review approval does not delay the release of new program year CDBG funds and activity completion.

CONSOLIDATED ANNUAL PERFORMANCE & EVALUATION REPORT (CAPER)

The City is required to report annually on project accomplishments and the progress that it made in carrying out the goals outlined in the Consolidated Plan and Annual Action Plan. This report is known as the Consolidated Annual Performance & Evaluation Report (CAPER).

A notice of public comment on the CAPER includes a description of the activities and financial accomplishments. The City shall consider all comments, verbal or in writing, received during the public comment period and include the comments in its submission to HUD within 90 days after the end of the program year ends.

PLAN AMENDMENTS

Accord to Title 24, Part 91, 91.505 amendments to the consolidated plan will be made when one or more of the following decisions are made. A substantial amendment will constitute an allocation of more than 10% of that grant years award.

- (1) To make a change in its allocation priorities or a change in the method of distribution of funds;
- (2) To carry out an activity, using funds from any program covered by the consolidated plan (including program income, reimbursements, repayment, recaptures, or reallocations from HUD), not previously described in the action plan; or
- (3) To change the purpose, scope, location, or beneficiaries of an activity.

The City must ensure that amendments to the ConPlan are consistent with its certification to affirmatively further fair housing and the analysis and strategies of the AFH. Prior to implementing any such amendment, the City will publish notice of public comment with detail on the proposed amendment(s) and a brief explanation for citizens to review a and submit written comment on the substantial amendment(s), input such amendments into the eConPlan IDIS System and notify the Hartford CPD office of HUD.

QUESTIONS / COMPLAINTS

In the event that a resident or agency has a question or complaint regarding the CDBG program please contact the CDBG Administrator or the Director of Economic & Community Development. The Administrator and/or Director will consider all matters and upon further consultation may request further steps be taken to address and resolve the matter. A written and verbal question or complaint will receive a written or verbal response within fifteen (15) business days.

CONTACT INFORMATION

City of Milford, Department of Economic & Community Development
Parsons Government Center
70 West River Street, 2nd Floor
Milford CT 06460 203-783-3230

Department of Housing & Urban Development
Community Planning Development
One Corporate Center
20 Church Street, 10th Floor
Hartford, CT 06103-3220 860-240-4800