



Citizen Participation Plan

City of Brownsville





Citizen Participation
Plan (24 CFR Part 91
Subpart B)

1. Provide a summary of the citizen/resident participation process.
2. Provide a summary of citizen/resident comments or views on the plan.
3. Provide a summary of efforts made to broaden public participation in the development of the Citizen Participation Plan, Consolidated Plan, Annual Action Plan (AAP), Consolidated Annual Performance and Evaluation Report (CAPER), and the Assessment of Fair Housing (AFH) including outreach to minorities and non-English speaking persons, as well as persons with disabilities.
4. Provide information regarding the amendment process for the Citizen Participation Plan, Consolidated Plan, Annual Action Plan, and AFH.
5. Provide information regarding Performance Reports, Public Hearings, and miscellaneous citizen participation requirements.
6. Provide a written explanation of comments not accepted and the reasons why these comments were not accepted.

* Please note that citizen/resident comments and responses may be included as additional files.

Citizen Participation Plan

1 Citizen Participation Plan

As required by the U.S. Department of Housing and Urban Development (HUD) Rules and Regulations, the City of Brownsville sets forth the Citizen Participation Plan as it relates to the administration of the Community Planning and Development programs funded by HUD. Pursuant to the citizen participation requirements of 24 CFR Section 91.105, the city has adopted (and amended) the following Citizen Participation Plan which sets forth the City's policies and procedures for citizen/resident participation.

Citizen/resident and community participation in the process of developing the Five-Year Consolidated Plan, Annual Action Plan, CAPER, and Assessment of Fair Housing (AFH) has been outlined in the discussion of the plan development process.

A. Encouragement of Citizen Participation

The City of Brownsville enables citizens/residents of the City to participate in the development of its Consolidated Plan, Annual Action Plan, Assessment of Fair Housing (AFH), CAPER, and any substantial amendments to the Consolidated Plan, Annual Action Plan, Assessment of Fair Housing, and required Consolidated Annual Performance and Evaluation Report (CAPER). The City encourages participation of low and moderate-income persons, particularly those living in slum and blighted areas of Brownsville, as defined by HUD, and in areas where CDBG funds are proposed to be used and by residents of predominantly low and moderate income neighborhoods. Outreach to Low and Moderate Income Persons include conducting meetings in a community that contains 51% or more low and moderate income residents based on current HUD data.

In addition, the City encourages the participation of all its citizens/residents, including minorities and non-English speaking persons, as well as persons with disabilities. For non-English speakers, the City will have copies available of the plans in Spanish. Residents needing materials in Spanish should contact the City. When meetings, public hearings, interviews are conducted in accordance with the Citizen Participation Plan, the City will provide Spanish translation services at locations where it is anticipated that non-English Spanish Speakers will attend. The City will provide translation services for other languages at any public meeting or public hearing, if the request for such services are requested four days in advance of the meeting. In addition, all meetings will be conducted in areas that are accessible to persons with disabilities. Provisions will be made to accommodate individuals who require interpreter services for the deaf, auxiliary aides, or services when request are made at least four days in advance prior to the public meeting.

B. Community Voice Campaign

The City has created a Community Voice campaign that takes place annually between the months of November and March. The Community Voice campaign consists of various community workshops and needs assessment surveys conducted throughout the four electoral districts of Brownsville, including neighborhoods, schools and public community centers. The Community Voice campaign is coordinated by the Office of Strategic Initiatives (OSI). In order to provide for the participation of homeless or previously homeless individuals in the City's funding process, the first event of each annual Community Voice campaign shall be held at a homeless shelter or a facility mainly serving homeless individuals.

Organizations and Agencies

The City encourages the participation of local and regional institutions, Continuum of Care, and other organizations such as businesses, developers, non-profit organizations, philanthropic organizations, and community and faith based organizations in the process of developing and implementing all documents covered by the Citizen Participation Plan. This is achieved through the Community Voice Campaign and working with the different organizations and agencies through interviews and focus groups.

Local Public Housing Authorities

The City encourages the Housing Authority of the City of Brownsville (HACB) and its tenants to participate in the process of developing and implementing the City's Consolidated Plan, Annual Action Plan, AFH, and other documents covered by this plan, along with other low income residents of targeted revitalization areas in which the developments are located. The City shall provide information to the HACB about the consolidated plan activities related to its developments so that the HACB can make this information available at their annual public hearing. The City encourages participation by the resident advisory board(s) and resident groups of the local public housing developments.

Online Engagement Techniques

The City has 3 electronic kiosks at public locations that are available to the citizens/residents for citizen input year round. The locations of the electronic kiosks are shared to the public through different outreach methods. The Citizen Participation Plan has and will continue to be amended as the City continues to gain access to different methods and avenues for participation by its residents.

C. Citizen Participation Plan Requirements

Citizen Input

The City, on an annual basis, through its Community Voice Campaign will survey citizens/residents and make available to, public agencies, and other interested parties, information that includes the amount of assistance the City expects to receive, including specific grant funds, available unspent prior year's funds, and related program income. The City will also disclose the range of activities that may be undertaken including the estimated amount that will benefit persons of low and moderate income.

The City will make available to citizens/residents, public agencies, and other interested parties, on an annual basis, the following information through the indicated means:

Information	Source
Amount of assistance	Written notice, public hearing
Range of activities	Written notice, public hearing
Amount to benefit <i>L/M</i>	Written notice, public hearing
Displacement	Public Hearing

City's Notification Requirement Regarding Draft Plan Availability

A notification will be advertised in a local newspaper of general circulation to inform the public that a draft Consolidated Plan, draft Assessment of Fair Housing, draft annual Action Plan, or any other document covered by this plan, is available to examine and subject to public comment. The notification will provide a summary of the proposed Consolidated Plan, AFH, annual Action Plan, or any other document covered by this plan, and describe the contents and purpose of the particular plan. The notice will also be posted on the City's home page (<http://www.cob.us>) and on bulletin boards at the locations below. The public notice will state that copies of the particular Plan will be available for review on the City's website and at the following locations for thirty days:

Brownsville Public Library
2600 Central Blvd.
Brownsville, Texas 78520

Southmost Community Network Center
2900 Southmost Road
Brownsville, Texas 78521

Westside Community Network Center
1763 US Highway 281
Brownsville, Texas 78520

Southmost Branch Library
4320 Southmost Road
Brownsville, Texas 78521

Housing Authority City of Brownsville
2602 Boca Chica
Brownsville, Texas 78521

Office of Strategic Initiatives
1150 E. Adams St 3rd floor.
Brownsville, Texas 78520

Office of the City Secretary
1034 E. Levee St.
Brownsville, Texas 78520

Please note that other sites might be included in the posting of notices and placement of documents for comment review, in order to broaden citizen/resident participation.

Citizen Response Time Frame

The City will make the Plan public, and upon request in a format accessible to persons with disabilities. The City will provide the citizens/residents a reasonable opportunity to comment on the Plan, and on any amendments to the Plan as defined by this Citizen Participation Plan.

The City will consider any comments or views of citizens/residents received in writing, or orally, at any of the public hearings, or during the 30-day public review and will address those comments in the preparation of the final consolidated plan, AFH, annual action plan, or any other documents covered under this plan. The City will include any written or oral comments in the final Consolidated Plan, AFH, Annual Action Plan, or any other documents covered under this plan that are submitted to HUD.

The City will also make copies of the draft plan, and Final Plan available to the general public, at no cost on the City's website (<http://www.cob.us>). In addition, the City will make a reasonable number of free copies of the proposed documents for citizens/residents and groups upon request.

D. Amendments

There are two types of amendments that may occur: Substantial amendments and minor amendments. An amendment to the AAP or projects. The City will amend its approved plan whenever it makes one of the following decisions:

Substantial Amendment

To make a change in the goal, priority, or activity of the Consolidated Plan; or

To carry out an activity, using funds from any program covered by the Consolidated Plan " (including program income), not previously covered in the Action Plan;

To change the purpose, scope, location, or beneficiaries of an activity included in the annual action plan; or

A material change in the AFH HUD provided data which effect established priorities and goals.

Further, a substantial amendment to the Annual Action Plan is defined by the following:

CDBG: an increase or decrease greater than 30% of the activity allocation as listed in a published Action Plan or amendment Plan;

HOME: an increase or decrease greater than 40% of the activity allocation as listed in a published Action Plan or amendment Plan;

ESG: an increase or decrease greater than 50% of the activity allocation as listed in a published Action Plan or amendment Plan;

Substantial amendments to the Plan will need to be presented to the Brownsville City Commission for their review and approval. The public will also be notified by advertising the amendment in the local newspaper and/or web based outlets and made available at the following locations and the City of Brownsville website, <http://grant.cob.us>. The advertising of the substantial amendment will begin a thirty (30) day citizen/resident review and comment period. The City will consider any comments or views of citizens/residents received in writing or orally during the

comment period. The City will submit to HUD, a letter authorizing the amendment after the thirty-day comment period, and will implement the amendment thereafter.

<u>Locations:</u>	<u>Address</u>
Brownsville Public Library	2600 Central Blvd.
Southmost Community Network Center	2900 Southmost Road
Southmost Branch Library	4320 Southmost Road
Westside Community Network Center	1763 US Highway 281
Housing Authority of the City of Brownsville	2602 Boca Chica
Office of Strategic Initiatives	1150 E. Adams St 3rd floor
Office of the City Secretary	1034 E. Levee St.

Minor Amendments

All other changes to projects that do not exceed the thresholds for substantial amendment for CDBG, HOME and ESG programs will be considered to be minor amendments. Minor amendments will be reviewed and approved by OIS Director and/or staff and a minor amendment is not subject to public comment.

Annual Action Plan

The draft AAP will be placed on display for a period of no less than 30 calendar days to encourage public review and comment. The public notice shall include a brief summary of the AAP, the anticipated amounts of funding (including program income, if any), the dates of the public display and comment period, the locations where copies of the draft AAP can be examined, how comments will be accepted, when the document will be considered for action by the City Commission, and the anticipated submission date to HUD. In addition, in course of developing the recommendation for a spending plan for the Annual Action Plan, the City **may** hold a series of additional public meetings to both provide information on the solicitation of proposals and the review of all proposals for consideration for funding. All public meetings of this nature will be advertised in accordance with the applicable public hearing provisions of Texas Open Meeting Law (Chapter 551, Title 5 Texas Government code, the Texas Open Meeting Act) including postings of public notice of the meeting.

Uncommitted/Reprogrammed funds.

In an effort to effectuate the timely and proper expenditure of funds, the City may adopt a number of secondary projects as part of the One-Year Action Plan. A secondary project shall be initiated in the event that a primary project meets unforeseen obstacles to timely implementation and expenditure of appropriated funds. Funding shall be reprogrammed from the primary project and redirected to the selected secondary project for initiation of the selected activity. The affected primary project may be left “open” in IDIS until such time as the project is ready to proceed. Funding for the primary project may be reprogrammed from existing closed projects that have a budget surplus, program income or new entitlement funding. Because all described secondary projects were formulated as part of the development of the City’s One-Year Action Plan and all citizen participation and environmental requirements were met, the funding of a secondary project shall not be considered a substantial amendment to the City’s Plan.

At the discretion of the Office Strategic Initiatives (OSI) Director, funds may be reprogrammed from existing completed projects that have a budget surplus to a current project requiring additional funding, provided that the project requiring additional funding has been previously described in the Plan and the reprogramming funds do not exceed 30% for CDBG, 40% for HOME and 50% for ESG programs of the City’s total entitlement. Reprogramming of funds in the excess of the percentages outlined previously for the programs shall require the substantial amendment process and City Council approval.

E. Performance Report

At the end of each program year, as required by HUD, a Comprehensive Annual Performance and Evaluation Report (CAPER) must be submitted to HUD by December 29th. The CAPER gives an actual account of activities, which occurred during the previous program year, and how the City maintained and expended funds, which were outlined in the annual Action Plan for that program year.

CAPER Public Comment:

Upon completion of the CAPER, and at least fifteen (15) days prior to its submission to HUD, the City will make the Report available to the general public for a fifteen (15) day review and comment period. Any comments received from the general public will be included in CAPER submitted to HUD.

The City will provide a notice in the local newspaper and/or web based outlets for the availability of the CAPER, which will begin a fifteen-day review and comment period. A public notice will be advertised at least one week in advance, and published on two occasions prior to the review period. The notice and the draft

CAPER will also be made available to the public via the City's website (<http://www.cob.us>).

F. Public Hearings

All public hearings will be advertised by publication prior to the hearing date in a newspaper of general circulation throughout the area(s) eligible to receive funds under the programs advertised. The first notice must be published no later than forty-eight (48) hours prior to the hearing date. All public hearing notices will also be posted on the City of Brownsville's website (<http://www.cob.us>) and/or on the local cable access channel at least two weeks prior to the hearing date. The City will consider any comments or views of citizens/residents received in writing or orally at a public hearing. Each hearing will be held in the evening at facilities that are handicapped accessible. (Recent locations include the Brownsville Housing Authority's Community Center, Brownsville Public Library, Westside Community Network Station, and the Southmost Community Network. All of these locations are convenient to potential and actual beneficiaries, and will accommodate persons with disabilities.) The City may also hold public hearings virtually or electronic form. OSI will make the information and instruction of a public hearing virtually or electronic through the publication and posting the publication through the City of Brownsville's website (<http://www.cob.us>) and provide instructions and email to submit public comments electronically or via mail.

Each public hearing notice must include the availability of an interpreter if a significant number of non-English speaking or hearing-impaired persons are expected to participate at the hearing. Public hearing notices will be translated into Spanish. It will be the responsibility of the residents to notify the City at least four days in advance of the hearing if interpreter services are needed. Each public hearing notice will indicate this policy and provide a telephone number to contact the City.

In case of a National Disaster or National Emergency and allowable in the form of waiver by HUD, OSI will hold public hearings virtually or electronic form. OSI will make any publication through the City of Brownsville's website (<http://www.cob.us>) and provide instructions and email to submit public comments electronically or via mail.

In response to COVID-19, HUD has issued a memorandum of waivers of certain regulatory requirements associated with several CPD grant programs to prevent the spread of COVID-19 and to facilitate assistance to eligible communities and households impacted economically by COVID- 19. The 30-day minimum for the required public comment is waived for substantial amendments, provided that no fewer than 5 days are provided public comments on each substantial amendment. The City will apply this waiver and provide a period of 5 days for public comment on each substantial amendment. This waiver will only be available and in place

through the end of the recipient's 2020 program year. Once expired, the 30 day minimum for the required public comment will be re-establish.

G. Access to Records

The City will provide citizens/residents, public agencies and other interested parties access to information and records relating to the City's Consolidated Plan, AFH, and the City's use of funds for the CDBG, HOME, ESG programs, and any Program Income for the preceding five years. Citizens/residents must allow the staff of the Office of Strategic Initiatives up to twelve working days to compile and provide the information requested by the citizen/resident.

H. Technical Assistance

The Office of Strategic Initiatives will provide technical assistance to the Citizens Advisory Committee and groups representative of persons of low and moderate income that request such assistance in developing proposals for funding assistance under any of the federal or state programs covered by the Consolidated Plan. The level and type of assistance will be determined by the Office of Strategic Initiatives, but shall not include the provision of funds to any person, group, or agency.

I. Complaints

Citizens/residents with complaints related to the Consolidated Plan, amendments, the annual performance report, and other documents covered by this plan must submit the complaint in writing to:

Office of Strategic Initiatives
Attention: Director
1150 E. Adams Street,
Brownsville, Texas 78520

If the complaint is given orally, the person initiating the complaint must schedule a meeting with the Director at the above-mentioned address and a formal complaint letter will be transcribed. The person must sign the letter and submit an address for response.

Upon receipt of the written complaint, the Office of Strategic Initiatives will respond to the complaint in writing within fifteen working days. A meeting to discuss the complaint must be scheduled by the person initiating the complaint.

J. Use of the Citizen Participation Plan

The requirements for citizen/resident participation do not restrict the responsibility or authority of the jurisdiction in the development and execution of the City's Consolidated Plan and AFH.

K. Anti-Displacement and Relocation Plan

The City of Brownsville has as a goal, the non-displacement of any person(s) currently residing in standard housing (housing that does or will meet the HUD Housing Quality Standards with minimal improvements). However, the City also has a goal to not allow any person(s) to reside in dangerous and /or substandard housing. When the health and safety of any person is threatened due to the condition of their current housing, the City, when notified of the condition, will attempt to assist the property owner in bringing the housing up to Housing Quality Standards, remove such substandard housing, or recommend temporary or permanent displacement of the person(s) residing therein.

If the City provides, or proposes to provide, any CDBG, HOME, or other HUD-funded assistance to acquire, demolish, bring any existing housing units up to the minimum local health and building code requirements, or any action results in the direct permanent displacement of any legal resident(s), it will comply with the procedures, and provide the benefits, outlined in the ***Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (42 U.S.C. 4601), as amended***; the implementing regulations issued by the Department of Transportation at 49 CFR 24; and ***Section 104(d) of the Housing and Community Development Act of 1974[42U.S.C. 5304(d)]***.

Prior to any action that will result in the displacement of any existing resident(s) of existing housing units(s) the City will notify all affected residents of the intended displacement action, and the extent of the benefits that will be available to each impacted person as outlined in 42 U.S.C. 4601 and 5304(d), and 49 CFR 24.

2

Comments Received

Email Comment:

City of Brownsville Response:

3

Efforts to Broaden Participation

4

Comments Not Accepted

All comments formally submitted have been included with responses in the comments

