



City of Bradenton Citizen Participation Plan

Wayne H. Poston, Mayor

Staff and Administration

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**City of Bradenton, Florida
Department of Planning and Community Development
Housing and Community Development Division**

Citizen Participation Plan

Mayor

Honorable Wayne H. Poston

Ward 1

Councilman Gene Gallo

Ward 2

Councilman, Vice Mayor Gene Brown

Ward 3

Councilman Patrick Roff

Ward 4

Councilman Bemis Smith

Ward 5

Councilman Harold Byrd

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City of Bradenton Citizen Participation Plan

Purpose

The purpose of the Citizen Participation Plan (CPP) is to encourage citizens to participate in the development of the City's Consolidated Plan, Annual Action Plan, and Annual Performance Report. The City of Bradenton is an Entitlement Community and receives Community Development Block Grant (CDBG) funds from the US Department of Housing and Urban Development (HUD).

The City of Bradenton recognizes that citizen participation, particularly by low income, minority, non-English speaking, and disabled persons, is a very important part of the planning process. The CPP is designed to ensure all interested persons are able to access, understand, and comment upon information related to the Consolidated Plan, Annual Action Plan and Annual Performance Report.

Introduction

The City of Bradenton has prepared the Citizen Participation Plan in accordance with 24 CFR Section 91.105. The Planning and Community Development Department is responsible for administering the Citizen Participation Plan.

Citizen participation will be encouraged, during the development of plans and performance reports, by providing proper notice to residents of public comment opportunities, by providing copies of any plan or performance report in a format accessible to all persons, and by conducting public hearings/public meetings at a time and location convenient to potential and actual beneficiaries of the program.

The CPP describes the policies and regulations that govern citizen participation and outlines the procedures used to encourage participation by all City residents – especially residents who are low income (particularly those who live in low income or slum/blighted areas), disabled, non-English speaking, and minorities.

One major component of the citizen participation process is the use of public hearings. Regulations require that the City of Bradenton hold at least two (2) public hearings at two different stages of the program year. 1) The first public hearing must be held to obtain the views of citizens on housing and community development needs, including priority non-housing community development needs. Therefore, the first public hearing will be held before the proposed Consolidated Plan is published for comment. 2) The second public hearing is required to be held during the development of the program annual

performance report. More information on Public Hearings will be provided in subsequent sections of this Citizen Participation Plan.

Development of the Consolidated Plan

The Consolidated Plan serves multiple purposes; 1) It is planning document for the City of Bradenton, which builds on input provided by citizens, organizations, businesses, and other stakeholders; 2) It is a submission for CDBG funds under HUD's formula grant programs; 3) It creates a strategy to be followed in carrying out HUD programs and other funding sources identified in the Plan; and 4) It is a management tool for assessing performance and tracking results.

The Consolidated Plan prioritizes community needs as it relates to providing decent housing, a suitable living environment, and expanding economic opportunities principally for low and moderate income persons. The Consolidated Plan serves as a comprehensive planning document directing all housing and community development activities within the City of Bradenton, regardless of funding source. This could include State funding, such as the State Housing Initiative Partnership program (SHIP), which is designed to produce and preserve affordable homeownership and multifamily housing primarily for low income persons throughout the state.

Community Input. The City of Bradenton will hold, at a minimum, two (2) community input meetings. These meetings will be held in target areas within the City and at times convenient to those the program may serve. The City may also use other methods to gather citizen input regarding housing and community development needs, such as written surveys, web-based surveys, and information tables at City Hall/other public places. The City will continue to explore these and other methods to engage its citizens and will employ new methods as necessary in preparing the Consolidated Plan.

In addition to community input meetings, the City of Bradenton will also consult with various community stakeholders and experts. The City of Bradenton will consult with public and private agencies that provide assisted housing, health service providers, local businesses, the Continuum of Care, affordable housing providers, city departments (i.e., code enforcement, public works), homeless providers, veteran groups, groups working with the disabled, philanthropic organizations, community-based organizations, faith-based organizations, surrounding units of government, and child welfare groups. Additionally, the City of Bradenton shall encourage the participation of residents of public and assisted housing developments, along with other low income residents of targeted revitalization areas in which the developments are located. This list can vary from year to year depending on the providers and needs within our community.

Public Hearing. The City of Bradenton will hold one (1) public hearing during the development of the Consolidated Plan, prior to the City Council considering

adoption of the proposed Consolidated Plan. The public hearing will be held to obtain the views of citizens on housing and community development needs, including priority non-housing community development needs.

Public hearings will be scheduled at facilities that are handicapped accessible, and the City will make reasonable accommodations to ensure that persons with disabilities are able to participate in the process. Persons requesting a reasonable accommodation need to contact the Planning and Community Development Department at least five (5) days prior to the public hearing to allow staff enough time to accommodate their request. Persons whose first language is not English may also request a reasonable accommodation, provided that they also contact the Planning and Community Development Department at least five (5) days prior to a public hearing.

Public Notice for Public Hearing. The City of Bradenton will publish a notification of the public hearing in local print media, including those that serve non-English speaking residents, at least ten (10) days prior to the date of the public hearing. The City of Bradenton will make available to citizens, public agencies, and other interested parties the amount of assistance the City expects to receive (grant funds and program income) and the range of activities that may be undertaken, including the estimated amount that will be spent to benefit low and moderate income persons.

Public Notice for Proposed Consolidated Plan. The City of Bradenton will publish the proposed Consolidated Plan on the City's website to give citizens, public agencies and other interested parties a reasonable opportunity to examine its contents and submit comments. In addition, hard copies of the proposed Consolidated Plan will be placed in the City Clerk's Office, City Planning and Community Development Department, and Manatee County's Central Library location and made available for review. Lastly, a summary of the proposed Consolidated Plan will be published in local print media, including any that serve non-English speaking residents, and will provide a description of the contents and purpose of the Plan. The notice shall include locations where the entire proposed Consolidated Plan can be examined.

The public notice for the proposed Consolidated Plan will provide a summary of the proposed Consolidated Plan, the start and end date of the 30-day public comment period, and include information on how and where comments may be submitted. The notice shall also include the date and time the Consolidated Plan will be considered by the City Council for adoption.

Comment Period. The public notice shall be published at the beginning of the 30-day comment period. The end of the 30-day comment period shall be before the City Council considers adoption of the Consolidated Plan.

Adoption of Consolidated Plan. The Consolidated Plan will be adopted by the

Mayor and City Council during a regularly scheduled City Council meeting.

The City of Bradenton will consider any public comments received in the development of the Plan, whether in writing or orally at the public meetings, and will include a summary of these comments in the final Consolidated Plan. If any comments or views are not accepted by the City for the purposes of Consolidated Plan development, the City will include a summary of the comments or views not accepted and the reason(s) they were not accepted in the Consolidated Plan.

Development of the Annual Action Plan

Each program year, as a part of the Consolidated Plan process, the City of Bradenton must develop an Annual Action Plan. The Annual Action Plan identifies the sources of funding, statement of objectives, description of the projects and activities, geographic distribution of activities, monitoring of subrecipients, and the results of past activities.

As the Annual Action Plan is technically a part of the Consolidated Plan, the development of the Annual Action Plan will follow the same process as development of a Consolidated Plan, as explained in the previous section of this Citizen Participation Plan.

Substantial Amendments

The City of Bradenton may amend or change its Consolidated Plan, Performance Report, and even this Citizen Participation Plan from time to time as program rules, local resources, and activities may change over time. Federal regulations require the City of Bradenton to identify the what types of changes to the Consolidated Plan that are large enough to require citizen review and input prior to the changes taking place.

The City of Bradenton will consider proposed amendments to be substantial amendments if they involve any of the following types of changes:

- a) a change in use of CDBG funds from one eligible activity to another;
- b) a change that increases or decreases the funding of an approved activity when the change is more than 25% of the funds originally allocated for the activity;
- c) a significant change in the location of an activity;
- d) a change in the purpose, scope, or beneficiaries of an activity;
- e) any change to the Citizen Participation Plan.

Public Notice for Substantial Amendments. The City of Bradenton will publish the proposed substantial amendment on the City's website to give citizens, public agencies and other interested parties a reasonable opportunity to examine its contents and submit comments. In addition, hard copies of the proposed

substantial amendment will be placed in the City Clerk's Office, City Planning and Community Development Department, and Manatee County's Central Library location and made available for review. Lastly, a summary of the proposed substantial amendment will be published in local print media, including any that serve non-English speaking residents. The notice shall include where copies of the proposed substantial amendment can be examined.

The public notice for the proposed substantial amendment will inform citizens of the start and end date of the 30-day public comment period and include information on how and where comments may be submitted. The notice shall also include the date and time the substantial amendment will be considered by the City Council for adoption.

Comment Period. The public notice shall be published at the beginning of the 30-day comment period. The end of the 30-day comment period shall be before the City Council considers adoption of the substantial amendment.

Adoption of Substantial Amendment. The substantial amendment will be adopted by the Mayor and City Council during a regularly scheduled City Council meeting.

The City of Bradenton will consider any public comments received in the development of the substantial amendment, whether in writing or orally at the public meetings, and will include a summary of these comments in the final substantial amendment. If any comments or views are not accepted by the City, the City will include a summary of the comments or views not accepted and the reason(s) they were not accepted in the substantial amendment.

Development of Annual Performance Report

Each year, the City of Bradenton is required to prepare an Annual Performance Report showing the progress it has made in carrying out the strategic plan and action plan found in the approved Consolidated Plan.

The Performance Report will include a description of the resources available (from all sources), the investment of those resources, where those resources were spent geographically, persons assisted (including racial, income, and ethnic status of persons assisted), actions to further fair housing, and other performance indicators found in the Consolidated Plan.

The City of Bradenton is required to submit an approved Annual Performance Report to HUD no later than 90 days from the end of the Program Year. The City of Bradenton's program year begins October 1st and ends September 30th. Therefore, the performance report is due to HUD no later than December 31st of each year.

Public Hearing. The City of Bradenton will hold one (1) public hearing during the development of the Performance Report, prior to the City Council considering the adoption of the proposed Performance Report.

The public hearing will be scheduled at a facility that is handicapped accessible and the City will make reasonable accommodations to ensure that persons with disabilities are able to participate in the process. Persons requesting a reasonable accommodation need to contact the Planning and Community Development Department at least five (5) days prior to the public hearing to allow staff enough time to accommodate their request. Persons whose first language is not English may also request a reasonable accommodation, provided that they also contact the Planning and Community Development Department at least five (5) days prior to a public hearing.

Public Notice for Proposed Annual Performance Report. The City of Bradenton will publish the proposed Performance Report on the City's website to give citizens, public agencies and other interested parties a reasonable opportunity to examine its contents and submit comments. In addition, hard copies of the proposed Performance Report will be placed in the City Clerk's Office, City Planning and Community Development Department, and Manatee County's Central Library location and made available for review. Lastly, a summary of the proposed Performance Report will be published in local print media, including any that serve non-English speaking residents, at least ten (10) days prior to the date of the public hearing. The notice shall include where copies of the proposed Performance Report can be examined.

The public notice will also inform citizens of the location and time of the public hearing, the start and end date of the 15-day public comment period, and information on how and where comments may be submitted.

Comment Period. The public notice shall be published at the beginning of a 15-day comment period. The end of the 15-day comment period shall be before the City Council considers adoption of the Performance Report. The notice shall include the date and time the Performance Report will be considered by the City Council for adoption.

Adoption of Annual Performance Report. The Performance Report will be adopted by the Mayor and City Council during a regularly scheduled City Council meeting.

The City of Bradenton will consider any public comments received in the development of the Performance Report, whether in writing or orally at the public meetings, and will include a summary of these comments in the final Performance Report. If any comments or views are not accepted by the City, the City will include a summary of the comments or views not accepted and the reason(s) they were not accepted in the Performance Report.

Access to Information

The City of Bradenton will ensure all citizens, public agencies, or any interested parties will have reasonable and timely access to information and records related to the Consolidated Plan and the City's use of assistance under the programs covered by the Consolidated Plan during the preceding five years to the closeout of a grant year.

The City of Bradenton will make certain all plans, reports, amendments, and other documents are available for review by all interested citizens. The City of Bradenton will publish copies of all plans, reports, amendments, and other documents related the Consolidated Plan on the City of Bradenton's website – www.cityofbradenton.com. In addition, the City will use email mailing lists maintained by the City, community organizations, and neighborhood organizations representing low and moderate income areas to increase participation opportunities and knowledge relating to the development or amendment of the Consolidated Plan and/or Performance Report.

In addition, hard copies of the Consolidated Plan, any substantial amendments, Annual Action Plan, and Annual Performance Report will be available at the following locations:

City Clerk's Office
Bradenton City Hall
101 12th Street West
Bradenton, FL 34205

Planning and Community Development
Bradenton City Hall
101 12th Street West
Bradenton, FL 34205

Manatee County Public Library
1301 Barcarrota Boulevard
Bradenton, FL 34205

The City will provide copies of all plans, reports, amendments, and other documents related the Consolidated Plan in a format accessible to persons with disabilities, upon request. In addition the City of Bradenton will provide a reasonable number of free copies of any plan or document to citizens and groups that request it.

Minutes from Public Meetings and Hearings will be available through the Planning and Community Development Department.

The City of Bradenton will maintain a record of all comments received from

citizens throughout the program year. As much as possible, staff will encourage citizens to put their views and comments in writing. However, staff will keep a record of all oral comments received, regardless of whether or not they are followed up with written comments. These comments will be available for public review upon request.

Technical Assistance

The City of Bradenton will provide technical assistance to groups representing low and moderate income individuals who are interested in developing funding proposals that benefit these persons. This technical assistance will include one-on-one consultations with these groups, group workshops for new subrecipients and other interested parties, a review of successful funding proposals, or other technical assistance methods that the group finds helpful. However, this technical assistance does not constitute an approval of any funding application the group makes to the City of Bradenton.

Complaints

The City of Bradenton may, from time to time, receive complaints regarding the Consolidated Plan, Substantial Amendments, and/or Annual Performance Report. The City of Bradenton will investigate appropriately and will respond in writing to complaints within fifteen (15) working days of receipt of the complaint, where practicable.

Anti-Displacement

Generally, the City of Bradenton does not engage in activities in which persons are permanently displaced. Should the City undertake a project using federal funds that involves the permanent displacement of persons, businesses, or farms, the City shall abide by the provisions set forth in the Uniform Relocation Act at 49 CFR Part 24. Should the need for displacement ever arise, the City will officially notify the residents or businesses expected to be displaced as soon as possible following approval of the activity. The notice will include a description of the proposed action, a discussion of how the resident or business owner might be affected, and information concerning their rights and benefits.

Use of Plan

The City of Bradenton will follow this Citizen Participation Plan in the development of the Consolidated Plan, and substantial amendments to the Consolidated Plan, Annual Action Plan, and the Annual Performance Report.

Inquiries, comments, or complaints concerning the Consolidated Plan, any amendments, Action Plan, or Performance Report can be submitted by contacting

City staff at:

*City of Bradenton Consolidated Plan Comments
Planning and Community Development Department
101 12th Street West
Bradenton, FL 34205
Telephone: 941-932-9423 Fax: 941-932-9534
E-Mail: CDBG@cityofbradenton.com*

In addition, complaints and comments can also be submitted to the local Jacksonville Field Office of the US Department of Housing and Urban Development at:

*US Department of Housing and Urban Development
Community Planning and Development Division
Charles Bennett Federal Building
400 West Bay Street, Suite 1015
Jacksonville, FL 32202
Telephone: 904-208-6077 Fax: 904-232-3617*

Anti-Displacement and Relocation Assistance Plan

Policy

This Residential Anti-Displacement and Relocation Assistance Plan is prepared by the City of Bradenton in accordance with the Housing and Community Development Act of 1974, as amended; and US Housing and Urban Development (HUD) regulations at 24 CFR 42.325, 24 CFR Part 570 and 49 CFR Part 24, as amended. It is applicable to any Community Development Block Grant (CDBG), UDAG, or HOME-assisted projects undertaken by the City of Bradenton. While the City will try to avoid displacing people from their homes as it plans and undertakes activities using these funds, the City recognizes that from time to time displacement may occur. The purpose of this policy is to ensure that the effects of displacement are minimized as much as possible.

Applicability

This plan applies to the City of Bradenton and/or any developer, contractor, or agency on projects sponsored by the City that are funded, in whole or in part, by HUD funds subject to the regulations at 24 CFR Part 570 and/or 24 CFR Part 92.

Minimize Displacement

Consistent with the goals and objectives of activities assisted under the Act, the City of Bradenton will take the following steps to minimize the direct and indirect displacement of persons from their homes. The term “family” applies to any size household.

1) Coordinate code enforcement activities with the city's rehabilitation and housing assistance programs.

It is not the Code Enforcement Division's intent to displace people from their homes. When code violations are found, residents will be given a reasonable time period in which to correct the code violations. Occasionally, however, the code violations may be severe enough that through consultation with the City's Building Division it is determined the home must be vacated because the code violations pose an imminent danger to life and health of the occupants. When code enforcement activities result in the temporary displacement of families from their homes, the City's Code Enforcement Division will provide these families with information on types of housing assistance available. This includes referrals to the City's housing rehabilitation program, the Bradenton Housing Authority, the American Red Cross, and other agencies that may provide housing assistance.

2) Assist people who have been temporarily displaced due to housing rehabilitation activities.

Occasionally families may be temporarily displaced as a result of housing rehabilitation activities undertaken by the City's housing rehabilitation program. This displacement is considered voluntary, so the provisions of 24 CFR Part 49 do not apply. However, the City at its discretion may include moving and storage expenses as part of the cost of rehabilitating the property.

3) Stage rehabilitation of apartment units to allow tenants to remain in the building/complex during and after the rehabilitation, working with empty units first.

Should the City undertake the rehabilitation of apartment units using federal funds mentioned above, the City will plan and execute the project in such a manner that displaces residents as little as possible. If possible, the City will rehabilitate any empty units in the complex first, so that residents may move into these units while their units are being renovated. Once the renovation of their unit is complete, residents will be given the option of remaining in the units they moved to or returning to their former units.

4) Adopt policies to identify and mitigate displacement resulting from intensive public investment in neighborhoods.

When planning reinvestment activities in neighborhoods using funds provided under the Housing and Community Development Act of 1974, as amended, the City will review these plans to ensure that the activities are carried out with minimal disruption to the neighborhood. The reinvestment plan will be made public and submitted to HUD prior to any obligation or expenditure of funds. Residents will be given an opportunity to view and comment upon the plans through the public outreach process:

- a) A description of the proposed activity and how it aligns with the goals of the City's Consolidated and Strategic Plans will be provided;
- b) The general location of the activity on an area map, including the number of homes that will be affected by the activity;
- c) A timetable for the commencement and completion of the activity;
- d) Services available to families whose homes are adversely affected by the activity;
- e) Coverage of actual reasonable moving expenses;
- f) Reimbursement for reasonable and necessary security deposits and credit checks that are not covered by a service provider;

- g) Reasonable interim living costs incurred prior to the family obtaining new permanent housing.

One-for-One Replacement

If vacant or occupiable low/moderate income dwelling units are demolished or converted to uses other than low/moderate income housing as a result of activities undertaken with federal funds, the City will replace these units with comparable units built to current building codes. These units may include public housing or existing housing receiving Section 8 tenant-based rental assistance. Whenever possible, the replacement units will be located near the location of the units demolished. All replacement housing will be provided within three years of the commencement of the demolition or conversion to nonresidential use of the prior units.

Before obligating or expending federal funds on an activity that involves demolition or conversion of housing units to non-residential uses, the city will provide the following information in writing to the public and to the U.S. Department of Housing and Urban Development:

- a) A description of the proposed assisted activity, including a description of how it relates to the goals set forth in the City's Consolidated and Strategic Plans;
- b) The general location on a service area map, including the approximate number of dwelling units by size (number of bedrooms) that will be demolished or converted to a use other than low-mod dwelling units;
- c) A time schedule for commencement and completion of the demolition or conversion;
- d) The general location on a service area map and approximate number of dwelling units by size (number of bedrooms) that will be provided as replacement units;
- e) Identification of the source of funding at the time of submittal and the time frame, location and source for the replacement dwelling unit;
- f) Information demonstrating that any proposed replacement of a unit with a smaller unit is consistent with the housing needs of low/moderate income persons in the City of Bradenton.

When Replacement is Not Required

Under 24 CFR 42.375(d), the City of Bradenton may submit a request to HUD for a determination that the one-for-one replacement requirement does not apply based

on objective data that there is an adequate supply of lower-income dwelling units in standard condition available on a non-discriminatory basis within the area.

Contacts

The City of Bradenton's Housing and Community Development Division is responsible for tracking the replacement of lower income dwelling units and ensuring they are provided within the required period. The Housing and Community Development Division is also responsible for providing relocation payments and other relocation assistance to any lower-income person displaced by the demolition of any dwelling unit or the conversion of lower-income dwelling units to another use.

City of Bradenton
Planning and Community Development Department
101 12th Street West
Bradenton, FL 34205
(941) 932-9400
E-mail: CDBG@cityofbradenton.com