

LEHIGH COUNTY, PENNSYLVANIA

CITIZEN PARTICIPATION PLAN

May, 2007

I. Purpose

This *Citizen Participation Plan* is for Lehigh County, Pennsylvania, which administers Federal Entitlement Programs funded through the U.S. Department of Housing and Urban Development (HUD) for the County. The purpose of this *Citizen Participation Plan* is to provide citizens within Lehigh County with a plan setting forth how they may choose to have a voice in the development, implementation, and evaluation of the Federal Entitlement Programs funded through the HUD.

This *Citizen Participation Plan* is designed to serve the following specific purposes:

- A. To present in a logical sequence the various components of the Entitlement Programs.
- B. To identify the responsible departments or agencies of the Lehigh County government who administer components of the Entitlement Programs.
- C. To clarify the opportunities that individual citizens, community organizations, and neighborhood groups will have to work with Lehigh County officials in developing each part of the Consolidated Plan and Annual Action Plans, from application development to program evaluation.
- D. To indicate the alternate courses of action that the Federal regulations make available to citizens and organizations.
- E. To act as a coordinating vehicle for citizen participation to be used by all agencies or officials responsible for various components of Lehigh County's Consolidated Plan and Annual Action Plans.

Any questions or comments on substantive issues or the adequacy of the *Citizen Participation Plan* should be referred to Laurie A. Moyer, Grants & Housing Manager, Lehigh County Government Center, 17 South Seventh Street, Allentown, PA 18101-2401. Phone: (610) 782-3565; FAX: (610) 820-8257; email: lauriemoyer@lehighcounty.org.

II. Mechanisms for Development of Citizen Participation

- A. The Office of Community Development shall be responsible for the *Citizen Participation Plan* including its dissemination and any revisions, which may be appropriate at the time, that Lehigh County begins planning for each new program year.
- B. Prior to the initial adoption of the *Citizen Participation Plan*, the Board of Commissioners and County Executive shall be provided with a copy of the *Citizen Participation Plan* for their review and comments.
- C. Lehigh County will issue an advertisement concerning the availability of this *Citizen Participation Plan*. The advertisement will appear in a newspaper of general circulation at least ten (10) calendar days prior to the adoption of the *Citizen Participation Plan* and

will indicate the locations at which the document will be made available for public review.

- D. Any individual citizen or organization submitting a written comment will receive a response from Lehigh County indicating the actions taken concerning the recommendations and the decision made with respect to that recommendation. Correspondence should be addressed to Laurie A. Moyer, Grants & Housing Manager, Lehigh County Government Center, 17 South Seventh Street, Allentown, PA 18101-2401.
- E. All references to advertising in a “Newspaper of General Circulation” refers to The Morning Call which circulates in the Allentown-Bethlehem-Easton Metropolitan Statistical Area (MSA) of Lehigh, Northampton and Carbon counties, and surrounding Pennsylvania counties of Berks, Bucks, Montgomery, Schuylkill and Monroe, plus Warren County, N.J. More than 266,000 people receive the newspaper during the week.

III. Consolidated Plan Process

A. Purpose of Consolidated Plan

HUD has amended regulations and procedures for applying for entitlement funds with a rule that consolidates into a single submission the planning and applications aspects of the Community Development Block Grant (CDBG) Program, Emergency Shelter Grants (ESG) Program, Home Investment Partnerships (HOME) Program, and the Housing Opportunities for persons with AIDS (HOPWA) Program. The rule also consolidates the reporting requirements for these programs, replacing the general performance reports with one performance report. The new consolidated document is referred to as the Consolidated Plan.

The Consolidated Plan serves the following functions: (1) A planning document for communities, which builds on a community participation process at the lowest levels; (2) An application for federal funds under HUD's formula grant programs; and (3) A strategy to be followed in administering HUD programs.

The Consolidated Plan cites estimated housing needs projected for the ensuing five-year period. The Annual Action Plan describes Lehigh County's intended use of the entitlement funding to be received for a particular fiscal year.

B. Development of the Annual Action Plan Application

1. Provision of Adequate Information

At the time that Lehigh County initiates the preparation of the Annual Action Plan in a new program year, a package of information will be compiled by the Office of Community Development for reference by individual citizens or organizations. This package will include:

- a. The total amount of entitlement funds to be made available to Lehigh County.
- b. The range of activities that may be undertaken with Federal funds and the kinds of activities that were previously funded and are still eligible under Federal regulations.
- c. The types of activities ineligible under Federal regulations.
- d. The process to be followed in preparing and approving the application, including the tentative schedule of meetings and hearings.
- e. The *Citizen Participation Plan*.

Residents and organizations in Lehigh County will be able to review this information relative to the *Citizen Participation Plan* at the Office of Community Development, Lehigh County Government Center, 17 South Seventh Street, Allentown, PA 18101-2401.

2. Provision of Technical Assistance

Technical assistance will be provided to citizens and citizen organizations so that they may adequately participate in planning, implementing, and assisting Entitlement Program development and to groups of low and moderate income persons and groups of residents of blighted neighborhoods, which request assistance in preparing proposals by staff personnel within Lehigh County. Technical assistance will consist of

- a. Answering questions orally or in writing concerning the procedures and timetable for the preparation of Applications, the eligibility under Federal regulations of various types of proposals or other Federal regulations governing application development or program implementation.
- b. Provisions of available information and data, which would pertain to the preparation of proposals for funding through the Entitlement Program or statements of view concerning ongoing programs or policies.

Citizens or organizations requiring technical assistance should contact Laurie A. Moyer, Grants & Housing Manager, Lehigh County Government Center, 17 South Seventh Street, Allentown, PA 18101-2401, telephone: (610) 782-3565.

3. Public Hearings:

Public hearings will be another basic way by which residents and organizations of Lehigh County will be given an opportunity to obtain information on the Entitlement Programs and to provide input into the development of the programs and applications for these funds. Lehigh County will hold at least two public hearings per year to obtain citizens*

views and to respond to proposals and questions. These hearings will be held at two different stages of the program planning process.

a. Initial Public Hearing

The first hearing will serve several purposes, such as providing a summary of program requirements, answering questions about the Annual Action Plan process, handled on a chronological basis, that is, from development of the application to final evaluation, and to obtain views and review proposals of citizens and organizations at the initial stage of preparation of the program.

The purpose of this initial hearing is to obtain the views of citizens and organizations regarding overall community development and housing needs, development of proposed activities, including the estimated amount that will benefit persons of low and moderate income, and to review program performance.

The intent of this meeting(s) will be to provide a mechanism of citizen participation at the County-wide, municipal and neighborhood level. Comments or recommendations on projects in specific localities will be encouraged.

This hearing will be conducted by the Office of Community Development, which is responsible for preparation of the application.

Persons who are elderly or handicapped and who would otherwise be unable to attend may receive transportation to these meetings if such transportation can be arranged. Such persons should contact Laurie A. Moyer, Grants & Housing Manager, Lehigh County Government Center, 17 South Seventh Street, Allentown, PA 18101-2401, telephone: (610) 782-3565 and request such assistance. The Office of Community Development will be charged with trying to arrange transportation and notifying the individual of the arrangements or the unavailability thereof. Generally, such request should be made at least two (2) working days prior to the hearing day.

Notice of the hearing will appear in the non-legal section of a newspaper of general circulation within Lehigh County. The notice shall be published at least ten (10) days prior to the public hearing.

In the event significant numbers of non-English speaking residents can reasonably be expected to attend public hearings, translation assistance will be provided so that they may participate effectively in the hearing.

b. Second Public Hearing

A second hearing will be undertaken when the draft application for funding has been prepared.

Upon completion of the proposed Action Plan, Lehigh County shall publish the proposed Plan or summary of the Plan in sufficient time to permit citizens to comment on the Plan prior to its approval and adoption by the County Executive. The notice will appear in the non-legal section of papers of general circulation at least thirty (30) calendar days prior to the adoption of the Plan and will indicate the locations at which the Plan will be made available for public review.

The second hearing will be conducted during the thirty (30) day review period of the proposed Action Plan. The notice of this second hearing may be combined with the notice of availability of the Draft Plan. However, the notice must allow at least ten (10) days from the date of publication to the date of hearing.

This hearing will be conducted by the Office of Community Development.

Following the thirty (30) day review period, the County Executive will take formal action on the application and forward it to the appropriate funding agency.

4. Acceptance of Written Comments, Proposals, or Recommendations:

At the time that planning begins for each year, organizations within Lehigh County will have the opportunity to submit comments, proposals, or recommendations on the Community Development Block Grant Program. Any resident or property owner in Lehigh County or any organization representing Lehigh County residents or property owners may participate.

Such a comment, proposal or recommendation may be directed to the attention of Laurie A. Moyer, Grants & Housing Manager, Lehigh County Government Center, 17 South Seventh Street, Allentown, PA 18101-2401, telephone: (610) 782-3565. At all times all written statements received will receive a written response no later than fifteen (15) working days from the date of receipt, setting forth the action taken or to be taken with respect to the comment, proposal, or recommendation. However, written statements that are intended to suggest modifications to the application can only be considered if they are received by the end of the thirty (30) day review period on the draft Action Plan.

5. Availability of the Consolidated Plan and Action Plan

After the Consolidated Plan and the Action Plan have been adopted, Lehigh County shall publish a notice in the newspapers of general circulation indicating its content and availability.

C. Complaint Procedure:

Any individual or organization may choose to file a complaint concerning the Lehigh County's Entitlement Programs. Complaints should be forwarded to Laurie A. Moyer, Grants & Housing Manager, Lehigh County Government Center, 17 South Seventh Street, Allentown, PA 18101-2401, telephone: (610) 782-3565. The complaint should contain the following information:

- a. The name and signature of the complainant, or if any organization has prepared the complaint, the name and signature of the officer of the organization responsible for correspondence.
- b. The address to which Lehigh County's response should be mailed.
- c. A telephone number where the complaint or an individual knowledgeable about the substance of the complaint can be reached during daytime hours.
- d. The nature of the complaint, including any relevant information or documentation.
- e. A recommendation concerning how the complainant wishes to have the matter resolved.

The Office of Community Development will make every reasonable effort to provide a written response to a complaint within fifteen (15) days of its receipt. Lehigh County will indicate its position on the matter and the action it proposes to take. The Office of Community Development will not be obligated, however, to respond to any anonymous or fictitious complaints.

If the Office of Community Development's response does not resolve the problem to the satisfaction of the complainant, he or she within two (2) weeks of the response by the Office of Community Development may request a meeting with the appropriate officials within the Lehigh County Office of Community Development, to resolve the problem. This meeting, whenever possible, shall be held within fifteen (15) working days of receipt of the request for a meeting. Following such meeting Lehigh County shall notify the complainant of its proposed resolution within ten (10) working days of the date of the meeting. If the complainant feels that the response is still not satisfactory, the complainant may follow the procedure described in the following section:

The above complaint procedure shall not be considered a prerequisite for persons or organizations wishing to file objections to applications pursuant to Federal regulations.

D. Filing Objections with Federal Funding Agency

Individuals or organizations who have followed the procedure described above to resolve complaints may choose to file an official objection with the U.S. Department of Housing and Urban Development, Philadelphia Regional Office, Wanamaker Building, 100 Penn Square East, Philadelphia, PA 19107-3380. Persons may choose to file a complaint directly with HUD and not follow the local complaint procedure established in #6 above. Following the local complaint procedures is not a prerequisite to filing an objection with HUD. However, citizens are encouraged to bring complaints first to the local level for resolution since HUD procedures require Lehigh County to respond to any complaint filed with HUD. Therefore, the best chance for immediate resolution to the problem rests at the County level.

E. Criteria for Amendment to Programs

1. Lehigh County may decide to make substantial amendments to its approved programs. Substantial change is defined as the increase or decrease in the cost of an approved activity by more than 30 percent or the change (increase or decrease) in the service area and/or class of beneficiaries of an activity. Such a course of action would constitute an amendment to an approved program. Lehigh County may decide to amend its approved programs based upon one of the following decisions, which shall be considered a substantial amendment:
 - a. To make substantial change in its allocation priorities;
 - b. To undertake an activity, using a substantial amount of funding from any program (including program income), which was not previously described in an action plan or funding application; or
 - c. To make a substantial change to the purpose, scope, location, or beneficiaries of an activity.

In the case of a substantial amendment Lehigh County shall provide citizens with reasonable notice of and opportunity to comment on, such proposed changes in its use of funds. The Office of Community Development will publish a notice in the non-legal section of the papers of general circulation in Lehigh County of the proposed program change and give interested or affected citizens at least thirty (30) calendar days to submit comments on the amendment. Lehigh County shall consider any such comments and, if Lehigh County deems appropriate, modify the amendment. The amendment will be approved by the Board of Commissioners.

2. Lehigh County may decide to make a revision to its approved programs. A revision is defined as a change in the budget for activities of less than 30 percent that does not substantially change the scope or beneficiaries. Revisions do not require the thirty (30) day public notice, but will be approved by the County Executive.
3. On completion of all amendments and revisions, the Office of Community Development will make the amendment public and will notify HUD that an amendment has been made. The Office of Community Development may submit a copy of each amendment to HUD as it occurs, or at the end of the program year. A letter transmitting such amendment to HUD shall be signed by the County Executive of Lehigh County or his/her designee.

F. Annual Performance Report

Lehigh County is required to file an annual performance report to HUD. The Office of Community Development will publish a notice of completion of the report in sufficient time to permit citizens to comment on the report prior to its submission to HUD. The notice will appear in newspapers of general circulation in Lehigh County at least fifteen (15) calendar days prior to

the submission of the report and will indicate the locations at which the report will be made available for public review. Lehigh County will consider any comments or views of citizens received in writing, or orally at public hearings in preparing a performance report. If required by program regulations, a summary of these comments or views shall be attached to the performance report.

G. Policy on Acquisition and Relocation

Lehigh County has adopted a Residential Anti-displacement and Relocation Assistance Plan, which indicates that Lehigh County will take every measure to minimize the displacement of persons or businesses. To the extent that such relocation activity is necessary, the Office of Community Development will have responsibility to ensure that requirements are met for notification and provision of relocation assistance in accordance with applicable Federal regulations and guidelines.

H. Use of Plan

Lehigh County shall follow the *Citizen Participation Plan* for all funding applications and amendments to the approved applications.

This *Citizen Participation Plan* may be modified from time to time by Lehigh County provided such revisions are consistent with Federal and State law, regulations and administrative requirements covering citizen participation. Prior to any modification of the *Citizen Participation Plan*, the Office of Community Development will publish a notice of modification in sufficient time to permit citizens to comment prior to approval by the County Council. The notice shall be published in newspapers of general circulation at least ten (10) calendar days prior to the adoption of the modification by the County Council.

Any questions or comments on this *Citizen Participation Plan* or request for information should be directed to:

Laurie A. Moyer
Grants & Housing Manager
Lehigh County Government Center
17 South Seventh Street
Allentown, PA 18101-2401
Telephone: (610) 782-3565