

Updated 2020

Citizen Participation Plan

Lancaster County Entitlement Grant Programs



THE CITIZEN PARTICIPATION PLAN SETS FORTH THE POLICIES AND PROCEDURES TO BE USED FOR CITIZEN PARTICIPATION FOR THE COUNTY'S ENTITLEMENT GRANTS THROUGH THE U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT (HUD).

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Table of contents

1.	Introduction.....	2
2.	Lancaster County Entitlement Grant Programs Overview ...	5
3.	Citizens’ Rights and Privileges.....	9
4.	Citizen Participation Organization	12
5.	Municipal Consultation Process.....	18
6.	Planning Process	19
7.	Substantial Change Policy.....	27
8.	Anti-Displacement Policy.....	29
9.	Citizen Participation Plan Amendments	30
10.	Temporary Amendments Due to COVID-19 Pandemic.....	31

Chapter 1 – Introduction

Background

Lancaster County receives funding from three entitlement grant programs (collectively, the Programs or Program) through the U. S. Department of Housing and Urban Development (HUD): The Community Development Block Grant Funds, the HOME Investment Partnership Program and the Emergency Solutions Grant.

In 1974, Congress passed the Housing and Community Development Act creating the [Community Development Block Grant \(CDBG\) Program](#). This program funds housing rehabilitation; community facility and infrastructure improvements; and public services.

The [HOME Investment Partnerships \(HOME\) Program](#) was authorized by the Cranston-Gonzalez National Affordable Housing Act of 1990. 1992 marked the first year of HOME Program funding for Lancaster County. This program funds housing-related activities for owner-occupied units and rental units including, but not limited to, construction of new affordable housing and rehabilitation of existing affordable housing and homeownership assistance.

Emergency Shelter Grant (ESG) program funds first became available to Lancaster County under the Stewart B. McKinney Homeless Assistance Act of 1987. The ESG program was substantially modified in 2011 and renamed the program “[Emergency Solutions Grant](#).” ESG funds can be used for rapid re-housing, emergency shelter costs, essential services and homeless prevention activities.

In 1995, HUD implemented the Consolidated Plan process to serve as the planning document and application process for the Programs. 24 CFR Part 91 codifies the regulations setting forth for the Consolidated Plan submission requirements. A major component of these requirements includes the adoption of a Citizen Participation Plan.

Public Involvement in Decision-Making

In order to determine how Lancaster County may best utilize Program funds, The County wants to involve the people affected by the projects and activities proposed for funding. Citizens and municipal officials are asked to advise the County by assisting in the planning and evaluation of the County’s Consolidated Plan and Annual Action Plans.

Lead Agency

The Lancaster County Commissioners have designated the Redevelopment Authority of the County of Lancaster (**Redevelopment Authority**) as the lead agency responsible for coordinating the planning and submission of the County's Consolidated Plan, including the Annual Action Plans and associated Consolidated Annual Performance and Evaluation Reports (CAPER). As the lead agency, the Redevelopment Authority is also responsible for development of the required citizen participation process.

Lancaster County and Lancaster City, each designated as entitlement communities under the Programs, have chosen to form a consortium under the HOME program. Lancaster County is designated as the Lead Entity of the HOME Consortium with the Redevelopment Authority administering the Consortium for the County.

Plan Objectives

The Lancaster County Commissioners and the Redevelopment Authority recognize and support the importance of informed, effective, and meaningful citizen participation in order to have successful Programs that benefit all Lancaster County residents. The Redevelopment Authority seeks the cooperation of Lancaster County residents, other public and private agencies and local municipalities to ensure that the goals and objectives of the County's Consolidated Plan are successfully attained. The Redevelopment Authority has been developed this plan with input from citizens. The objectives of Lancaster County's Citizen Participation Plan are:

- To provide an approach for citizen involvement that is conducted in an open manner, with freedom of access for all interested persons.
- To provide for and encourage citizens to participate in the planning, development, and evaluation of the County's Programs, the activities of each Annual Action Plan and any substantial amendments to the Consolidated Plan or the Annual Action Plans.
- To provide for and encourage the involvement of the following groups of people whenever possible, in the decision-making process:
 - low- and moderate- income persons,
 - residents of areas where a significant number of community development activities are proposed or are being undertaken,
 - residents of predominantly low- and moderate- income neighborhoods or communities,

- people with disabilities,
 - the elderly,
 - the business community,
 - local municipal officials, and
 - members of civic or community groups.
- To provide information about Consolidated Plan activities to the Lancaster County Housing Authority. (Because there is no public housing outside the City of Lancaster, which receives its own entitlements, this plan makes no specific provisions for the participation of residents of public housing developments.)
- To provide elected public officials of Lancaster County government with current information about the concerns of citizens and local municipal officials regarding local community problems, plans, and projects, and their relative priorities.
- To provide an opportunity for Lancaster County residents to become involved in preparing, undertaking, and evaluating housing, community and economic development activities contained in the Annual Action Plans.
- To ensure the opportunity for participation and involvement in the County's Programs by all citizens of Lancaster County regardless of sex, race, ethnicity, creed, age, religion, disability, language, or economic status.

Chapter 2 – Lancaster County Entitlement Grant Programs Overview

Primary National Objectives

The primary national objective of the Housing and Community Development Act of 1974, as amended, is:

“ . . . the development of viable urban communities, by providing decent housing and suitable living environments and expanding economic opportunities, principally for persons of low and moderate income.”

All activities funded through the County’s Programs address one of the three primary objectives and one of the three outcomes that benefit low- and moderate-income people. They are as follows:

Objectives	Outcomes
Create Suitable Living	Improve Availability/Accessibility
Provide Decent Affordable Housing	Improve Affordability
Create Economic Opportunity	Improve Sustainability

The Emergency Solutions Grant (ESG) assists people to quickly regain stability in permanent housing after experiencing a housing crisis and/or homelessness. ESG can fund emergency shelter, homeless prevention programs, street outreach and rapid rehousing program.

The primary national objective of the HOME Program is to provide affordable housing opportunities for lower income families. HOME funds may be used for the rehabilitation, conversion, or new construction of single-family or multi-family housing, as well as assisting lower income families with the purchase of a new home.

Activities

An activity must not only be eligible, but also fundable.

Eligible

Under the CDBG and HOME Programs, Lancaster County can determine the priority needs from a list of eligible activities. An eligible activity can be described as what is permitted to be done within program guidelines.

Fundable

In order to be fundable, activities must:

- Principally benefit low- and moderate- income families and persons; or
- Aid in the prevention or elimination of slums and/or blighted conditions; or
- Address and urgent need.

All proposed activities must also be appropriate to meet the objectives of the Programs. In order to ensure that all activities and projects funded through the Programs are designed to address those needs and objectives, each proposed activity is subjected to an administrative and citizen review process as described in the following sections.

Community Development Block Grant Program

Any activity funded through CDBG funds must be directed toward the following specific national objectives established by Congress:

- The elimination of slums and blight, the prevention of blighting influences and of deterioration of property and neighborhood and community facilities of importance to the welfare of the community, principally for persons of low- and moderate- income;
- The elimination of conditions that are detrimental to the health, safety, and public welfare through code enforcement, demolition, interim rehabilitation assistance, and related activities;
- The conservation and expansion of the nation's housing stock in order to provide a decent home and a suitable living environment for all persons, but principally for those of low- and moderate- income;
- The expansion and improvement of the quantity and quality of community services, principally for persons of low- and moderate- income, which are essential for sound community development and for the development of viable urban communities;
- A more rational utilization of land and other natural resources and the better arrangement of residential, commercial, industrial, recreational, and other needed activity centers;

- The reduction of the isolation of distinct income groups within communities and geographical areas and the promotion of an increase in the diversity and vitality of neighborhoods through the spatial de-concentration of housing opportunities for persons of lower income and the revitalization of deteriorating or deteriorated neighborhoods to attract persons of higher income;
- The restoration and preservation of properties of special value for historic, architectural, or aesthetic reasons;
- The alleviation of physical and economic distress through the stimulation of private investment in community revitalization in areas with population out migration, or a stagnating or declining tax base; and
- The conservation of the nation's scarce energy resources, improvement of energy efficiency, and the provision of alternative and renewable energy sources of supply.

HOME Investment Partnerships Program

Congress has established a national goal that every American family be able to afford a decent home in a suitable environment. The primary objective of the national housing policy is to reaffirm the national commitment to decent, safe, and sanitary housing for every American by strengthening a nationwide partnership of public and private institutions.

Activities funded through Lancaster County's HOME Program are to be directed toward the following specific Congressional objectives:

- To help families not owning a home to save for a down payment for the purchase of a home;
- To retain wherever feasible, as housing affordable to low-income families, those dwelling units produced for such purpose with Federal assistance;
- To extend and strengthen partnerships among all levels of government and the private sector, including for-profit and non-profit organizations, in the production and operation of housing affordable to low-income and moderate-income families;
- To expand and improve Federal rental assistance for very low-income families; and
- To increase the supply of supportive housing which combines structural features and services needed to enable persons with special needs to live in dignity and independence.

Emergency Solutions Grant Program

Eligible activities for Emergency Solutions Grant include not only the traditional shelter and outreach activities, but also rapid re-housing activities. Rapid rehousing activities include short- or medium-term rental assistance, housing relocation or stabilization services.

All proposed activities must also be appropriate to meet the objectives of the Programs. In order to ensure that all activities and projects funded through the Programs are designed to address those objectives, each proposed activity is subjected to an administrative and citizen project review process as described in the following sections.

Chapter 3 – Citizens’ Rights & Privileges

Introduction

This section provides an explanation of the rights and privileges of the citizens of Lancaster County about the County’s Programs, including the Consolidated Plan, the Annual Action Plans, and the Consolidated Annual Performance and Evaluation Reports. This section also describes any Redevelopment Authority action on proposals, views, and/or complaints made by private citizens, non-profit corporations, community agencies, or local municipalities.

Public Input

Citizens have the right to submit views and proposals regarding the Programs. This includes submission of views:

- Directly to the Redevelopment Authority during the early stages of the planning process.
- To the Community Development Steering Committee (with advance notice to the Redevelopment Authority).
- At neighborhood and other meetings scheduled by the Redevelopment Authority or local municipalities.
- At formal meetings of the local municipality’s governing body.
- At formal public hearings held by local municipalities and non-profits related to submitting applications for Program funding, and hearings held by the Redevelopment Authority or the County of Lancaster.

Complaints

Citizens have the right to submit complaints to the Redevelopment Authority at any time during the program year, if the complaint is in reference to a plan or activity related to the Programs. The Redevelopment Authority will make every reasonable effort to respond in writing to all complaints or grievances ***within fifteen (15) working days***.

Request Documents

Citizens may review, upon request, documents relevant to the Programs at the Redevelopment Authority office during normal working hours. The Redevelopment Authority reserves the right to require that any request for information be placed in writing. The documents to be made available for citizen review include the following:

- Consolidated Plans, Annual Action Plans, letters of approval from HUD, grant agreements, the Citizen Participation Plan, Consolidated Annual Performance and Evaluation Reports (CAPER), activity files (but not client files/information covered by confidentiality or privacy laws), and other reports required by HUD in relation to the Programs;
- Copies of the federal regulations and HUD transmittals, memorandums and notices governing the Programs; and
- Documents regarding other program requirements, such as contracting procedures, environmental policies, fair housing and equal opportunity requirements, and relocation provisions.

Objections to HUD’s Acceptance of the Plans

Citizens wishing to object to the acceptance of Lancaster County’s Consolidated Plan and Annual Action Plans by HUD may make their objections known to the HUD Regional Office. All objections should be addressed to the:

U.S. Department of Housing and Urban Development, Region III
 The Wanamaker Building
 100 Penn Square East
 Philadelphia, PA 19107-3380.

Public Notice

Citizens must be given adequate notice of all public hearings concerning the County’s Programs. In order to meet this requirement, the Redevelopment Authority publishes a notice, fourteen **(14) calendar days** before each public hearing, in the ***non-legal section*** of a newspaper of general circulation. The Redevelopment Authority also makes reasonable efforts to provide the notices, in the form of press releases, to neighborhood newspapers and as public service announcements on radio and television. Notices are also published on the Redevelopment Authority’s web site.

- General Circulation Newspapers - LNP, Sunday News (www.lancasteronline.com).
- Local Newspapers - Lititz Record Express, Ephrata Review.
- Internet web site: www.lchra.com

Accessibility of Meetings

All public hearings conducted by the County and the Redevelopment Authority shall be held in locations that can accommodate people with disabilities.

Translator

In the event it is determined that a significant number of non-English speaking residents or persons that are hearing impaired can be reasonably expected to participate in a public hearing, the Redevelopment Authority will provide a translator or interpreter, if possible. If it is not possible to provide a translator at the public hearing, a meeting will be arranged with a translator in attendance, to address concerns noted by non-English speaking residents or persons with hearing impairments.

Chapter 4 – Citizen Participation Organization

Introduction

The following details how Lancaster County, through the Redevelopment Authority, will operate its Programs, conduct the review and selection process for Annual Action Plan projects, and manage citizen involvement through the process.

Key Players

Lancaster County Commissioners

The Lancaster County Board of Commissioners (Commissioners) have the primary authority and responsibility for overseeing all activities undertaken through the Programs for Lancaster County. The Commissioners have the final and full authority for approving and making any decisions on the Consolidated Plan, the specific projects to be included in each Annual Action Plan, and any other issues related to the entitlement programs.

The Commissioners' authority for approving the Consolidated Plan and the Annual Action Plan will be exercised in consideration of all recommendations provided by the Board and staff of the Redevelopment Authority. Recommendations will also include the proposals, suggested priorities, and special conditions of the Community Development Steering Committee, and the Lancaster County Homeless Coalition.

Redevelopment Authority

The Redevelopment Authority is the local public agency designated by the Commissioners to serve as the County's agent for conducting all activities necessary for the planning, administration, management, and evaluation of the County's entitlement Programs. The activities of the Redevelopment Authority and the specific recommendations made by the staff, based on the suggested priorities of various citizen advisory committees, are subject to the approval of the five-member Board of the Redevelopment Authority.

The Redevelopment Authority's functions and responsibilities include the following:

- To develop policy recommendations concerning the Programs.
- To develop long-range and short-range goals and objectives for the County's Consolidated Plan.

- To determine the housing and community development needs of the County’s local municipalities and service providers. As part of this process, Redevelopment Authority staff:
 - consults with local participating municipalities;
 - serves as a member of the Lancaster County Homeless Coalition Governance Board;
 - serves on County planning task forces charged with the responsibility of assisting the County Planning Commission to prepare county-wide housing and economic development plans; and
- To design, develop, and implement procedures and systems as required by Federal regulations to effectively perform housing and community development planning, management, and evaluation functions for Lancaster County.
- To initiate, coordinate monitor, and evaluate activities.
- Coordinate the citizen participation process, including all public relations activities with:
 - local municipal officials,
 - service providers,
 - interest groups,
 - citizens, and
 - the media.
- To provide technical and administrative assistance in matters relating to the performance of the Authority’s specific housing and community development planning functions and responsibilities to:
 - the Lancaster County Commissioners,
 - the Board of the Redevelopment Authority,
 - local municipalities,
 - service providers,
 - the Community Development Steering Committee, and
 - Lancaster County Homeless Coalition.
- To review all Funding Request Application forms to determine the eligibility and fundability of proposed activities.
- To make funding recommendations for ESG and CDBG public services based on the scoring and ranking of Lancaster County Homeless Coalition.

- To design, develop, and prepare the Consolidated Plan and the Annual Action Plans for Lancaster County.

The Redevelopment Authority is responsible for disseminating information to municipalities, municipal authorities, organizations, service providers, and interested citizens at the time it begins planning for each fiscal year's Annual Action Plan. This step is described in further detail later in this document. This information includes:

- the total amount of Program Funds and program income available to Lancaster County for housing and community development activities,
- how to submit proposals requesting these funds,
- the range of activities that may be undertaken with these funds,
- the process to be followed in preparing and finalizing the Annual Action Plan,
- a timetable of important events and meetings, and
- information regarding Federal regulations and other important program requirements which affect the Programs.

The Redevelopment Authority is required to conduct at least two public hearings at two different stages of the planning process prior to submitting the Annual Action Plan for the County's Programs. One public hearing will be held after funding requests are submitted and the citizen participation review process has been completed. A second hearing will be held to obtain citizen views and comments on the proposed activities to receive funding in the Annual Action Plan along with a review of the Consolidated Plan and past performance of housing and community development activities in the County.

In addition to these two public hearings, each participating municipality or organization which intends to submit a potential physical improvement project to be funded is required to conduct a local public hearing prior to submitting the proposal to the Redevelopment Authority. Municipalities are encouraged to hold one public hearing at which all potential activities for the community can be presented for comment. This public hearing also provides an additional opportunity for citizens to discuss needs in the community that may be addressed with Program funding which are not presently included in the County's Consolidated Plan.

Lancaster County Planning Commission

The Lancaster County Planning Commission has the following specific responsibilities regarding the Programs:

- To ensure that the County's Consolidated Plan is consistent with the County's Comprehensive Plan, including *Places 2040*, and all other functional elements.

- To review, evaluate, and endorse all water and sewer project proposals, determined to be eligible and fundable under the CDBG Program, and to ensure they conform to Lancaster County’s adopted long-range *Places 2040*. This step shall occur prior to the projects being reviewed by Community Development Steering Committee.

Lancaster County Coalition to End Homelessness (LCCEH)

The Lancaster County Homeless Coalition participates in the development of the Consolidated Plan and Annual Action Plans in two ways:

- The Lancaster County Homeless Coalition reviews and comments on the sections of the Consolidated Plan related to homeless issues. The Lancaster County Homeless Coalition may also recommend revisions to the Consolidated Plan during the five-year period covered by each plan.
- The Lancaster County Homeless Coalition also reviews and recommends funding allocations of the proposed ESG and CDBG homeless activities that may be included in the County’s Annual Action Plans.

In accordance with the regulations at 576.405(a), Lancaster County must provide for the participation of not less than one homeless individual or formerly homeless individual on the board of directors or other equivalent policymaking entity of Lancaster County. The Lead Agency of the Lancaster County Homeless Coalition constitutes an equivalent policymaking entity. In order to protect privacy, the Redevelopment Authority will not require the name(s) of the homeless individual(s) or formerly homeless individual(s) serving on these two entities. It will, however, request annually that someone from the Lead Agency for the Continuum of Care certify that not less than one person is serving on one or both entities are or has been homeless.

Community Development Steering Committee

The Steering Committee’s primary responsibility is to review and discuss all physical improvement activities that may be included in each Annual Action Plan.

The Steering Committee is comprised of a maximum of twenty-five (25) individuals plus staff of the Redevelopment Authority. Seats are held by citizen representatives, who represent their respective municipalities, other at-large citizens, preferably low and moderate income persons and/or minorities, and professionals from such areas as the business community, the educational community, social service agencies, and labor and civic leaders. The Redevelopment Authority appoints all the individuals to fill these seats. These persons may or may not have prior experience with the citizen review process. An effort is made by the Redevelopment Authority to attain a relatively even level of representation from throughout

the County on the Community Development Steering Committee. The following restrictions will be made on the identifying representatives:

- Municipalities that have applied for CDBG funding in the current fiscal year will not be invited to participate.
- Municipal representatives from municipalities that participated in the previous year's allocation process will be asked to participate first.
- If a enough representatives from these municipalities cannot be recruited, municipalities that did not participate in the previous year's allocation process will be asked to participate, in random order.
- Each municipality will be asked to appoint a municipal representative and/or a citizen representative.

All meetings held by the Steering Committee are conducted in an open manner, with freedom of access for all interested persons. A list of the meetings will be posted on the Redevelopment Authority's website at www.lchra.com. Most meetings are held in the evening to allow maximum participation by the public. The meetings are held in such a manner that affected residents and other persons wishing to comment on specific activities being discussed by the Steering Committee are given an opportunity either prior to, or after, official discussions are concluded, but prior to any action by the committee.

When the presentations, discussions, and deliberations of the Committee members are completed, the Steering Committee scores and ranks all activities in one final unified activity priority ranking list. Funding levels are then awarded by the Redevelopment Authority staff to these activities based on the composite rankings beginning with the highest priority activity.

The Steering Committee may also meet, as needed, during the program year to discuss issues or policies developed during the year that may affect the County's Programs.

Chapter 5 – Municipal Consultation Process

Prioritization

As part of the development of the Consolidated Plan, Redevelopment Authority staff consults with participating municipalities. The main purpose of this consultation process is to more accurately determine or identify local municipal needs on a community-wide basis without regard to specific funding sources. Priority for the consultations are based on the following criteria:

- Municipalities in which many Program-funded activities have taken place during the most recent previous five-year period.
- Municipalities where fewer Program-funded activities have taken place, but which have significant concentrations of low- and moderate-income persons.
- Municipalities making a specific request or invitation to the Redevelopment Authority staff. Usually, these municipalities are interested in submitting a Funding Request Application for funding under the next Annual Action Plan.

Results of Process

As a result of the municipal consultation process, the Redevelopment Authority will determine information about the characteristics of the municipality and the specific smaller communities or neighborhoods which comprise the municipality. A preliminary five-year list of priority infrastructure activities will be developed (water and sewer, street reconstruction, parks, public facilities, etc.). Information about the characteristics of the municipality will be used to determine economic revitalization opportunities to be undertaken during the five-year period.

Chapter 6 – Planning Process

The Consolidated Plan

Public Participation for the Consolidated Plan

Each Consolidated Plan covers a five-year time period and reflects a study and determination of needs and priorities for Lancaster County. Lancaster County is designated as the Lead Entity of the HOME Consortium it has formed with the City of Lancaster and agrees to carry out such overall responsibilities, with the cooperation of the City, in accordance with 24 CFR 92.101. The County is responsible for submitting the Consolidated Plan to the Department of Housing and Urban Development (HUD), related to the housing needs of the consortium. Development of the Consolidated Plan will require the input from the City. The City will provide specific information concerning its housing needs and activities, as well as its Annual Action Plan relating of HOME activities, to the County, which will be included in the Consolidated Plan.

The first step in this process is accomplished by reviewing the following data:

- population statistics for the County and City of Lancaster,
- economic status of the County and City of Lancaster,
- goals and objectives contained in Lancaster County’s Comprehensive Policy Plan and associated Annual Action Plan components,
- Lancaster County *Places 2040*,
- Lancaster County’s Housing Plan,
- local municipal comprehensive and land use plans, and
- other data relevant to housing and community development needs.

In order to determine long range goals and objectives for their respective organizations, the Redevelopment Authority staff also consults with the following local entities and non-profit organizations including but not limited to:

- the Lancaster County Homeless Coalition,
- the Lancaster County Planning Commission,
- the United Way of Lancaster County,
- Lancaster Housing Opportunity Partnership (LHOP)

- the Community Action Partnership (CAP),
- Tabor Community Services, Inc., and
- the Spanish American Civic Association (SACA)

Those goals, objectives and strategies, which may be addressed through the Programs, are reviewed and evaluated for possible inclusion in the Consolidated Plan.

Non-profit housing development corporations and other local housing development entities such as LHOP, SACA and Community Basics Inc. are consulted specifically to identify housing goals, objectives and strategies that may be included in the Consolidated Plan.

Copies of the draft Consolidated Plan are made available to:

- local municipalities with census block groups in the top quartile of low- and moderate-income census block groups in the County,
- the organizations mentioned above,
- local public libraries, and
- adjoining entitlement communities including the City of Lancaster and the following counties; Berks, Chester, Dauphin, Lebanon and York.

In addition to the dissemination of copies of the Consolidated Plan, the Redevelopment Authority will hold at least two public hearings throughout the process to receive citizen input on the needs, goals, objectives and strategies to be included in the Consolidated Plan. One hearing is held during the development of the priority needs and goals to be addressed by the Programs. In those years following the adoption of the five-year Consolidated Plan, this hearing is also used to determine if any revisions or amendments need to be made to the Consolidated Plan.

The second hearing is held to present the final draft of the Consolidated Plan (once every five years, unless amendments have been recommended) and the Annual Action Plan. This hearing is held during the required thirty-day public comment period and prior to receiving the Lancaster County Commissioners' approval of Consolidated Plan and/or Annual Action Plan.

Annual Action Plans

Development of Annual Action Plans

The Redevelopment Authority using the goals, objectives, and strategies from the Consolidated Plan and its in-house recommendations, develops a proposed Annual Action Plan to be presented to the Lancaster County Commissioners. In those years when a new Consolidated

Plan is developed, or an existing Consolidated Plan is revised, the Redevelopment Authority staff also finalizes these documents to present to the Board for endorsement.

The Redevelopment Authority, at the time of the development of the Annual Action Plan, will provide annual funding level recommendations for various eligible activities. These activities are generally housing development and rehabilitation, public infrastructure and public facility improvements, and public services. The Redevelopment Authority will reserve 15% of the County's CDBG funds for public services in the Annual Action Plan targeting housing services.

Public Review and Comment

After the development of the proposed Annual Action Plan is completed, the Redevelopment Authority publishes a legal notice in the Lancaster newspapers announcing the following:

- the availability of the proposed Annual Action Plan,
- the locations where the documents will be available for inspection, and
- the scheduling details for the required public hearing.

Copies of the proposed Annual Action Plan are made available to the following agencies:

- Lancaster County Library, located in the City of Lancaster
- Community Action Partnership of Lancaster County, Inc. (Lancaster County's largest county-wide provider of services to low- and moderate-income persons),
- the Spanish American Civic Association (SACA),
- the Lancaster County Board of Commissioners,
- the Lancaster County Planning Commission,
- the Lancaster Housing Opportunity Partnership,
- Tabor Community Services, and
- the City of Lancaster.

Written copies of the proposed Annual Action will be made available to other interested agencies, groups, or citizens upon specific oral or written request. The plan will also be posted on the Redevelopment Authority's website (www.lchra.com).

Any comments received as a result of this notification process will be summarized and forwarded to the Lancaster County Commissioners.

Public Hearing

The Redevelopment Authority staff conducts a required public hearing to provide a final opportunity for the public to comment on the Consolidated Plan or the activities to receive funding in the Annual Action Plan. A legal notice announcing the date, time, and place of the public hearing is published at least fourteen (14) calendar days prior to the public hearing. This notice opens the formal public comment period. The notice is also forwarded to all applicants for Program funds and other organizations listed in the prior section.

This public hearing occurs in the middle of the required thirty-day public comment period, which concludes just before the Lancaster County Commissioners approve the final Annual Action Plan. Comments received during this public hearing are summarized and forwarded to the Lancaster County Commissioners for review along with the Annual Action Plan.

Redevelopment Authority Board Reviews

At the meeting of the Board of the Redevelopment Authority, the Board is requested to endorse the proposed Annual Action Plan. At this time the Board may exercise its authority to revise any staff recommendation it deems necessary or appropriate. The Board's final recommendations are then forwarded to the County Commissioners, noting the specific reasons for any revisions that may have been made.

Plan Approval

The County Commissioners, at the next regularly scheduled meeting held after the end of the thirty-day comment period, give final approval to the County's final Annual Action Plan. Once again, the Commissioners have the right to revise the recommendations of the Board of the Redevelopment Authority to any extent they deem appropriate.

Plan Submission

Following the approval of the Consolidated Plan and/or Annual Action Plan by the County Commissioners, the Redevelopment Authority submits the documents to the HUD for its acceptance. The fiscal year Programs begins January 1.

Funding Request Submission Process

Notice of Funding Availability (NOFA)

The Redevelopment Authority will distribute a Notice of Funding Availability (NOFA) in the to the following individuals and organizations:

- Municipal Mangers/Secretaries,

- Municipal Planning Commissions,
- Municipal Sewer and Water Authorities,
- County officials,
- civic groups,
- social service agencies, and
- interested citizens.

The information contained in the NOFA will include the following:

- A brief description of the County’s Programs, their goals and objectives, eligible and ineligible activities, and the amount of funds expected to be received for the next fiscal year;
- A timetable showing key dates that will occur during the planning process for the fiscal year program; and
- Instructions for consulting with the Redevelopment Authority and for obtaining the appropriate copies of the Funding Request Application.

Consultation with Redevelopment Authority Staff

Those municipalities and non-profit organizations proposing to request Program funds are required to consult with the staff of the Redevelopment Authority to determine if the proposed activity is eligible and fundable under the appropriate funding source regulations. If the Redevelopment Authority staff makes a favorable preliminary determination, then the organization is sent the following information:

- specific local citizen participation and notification requirements,
- a sample press release to be used to announce the required local public hearing on the proposed activities, and
- the appropriate funding requests.

Project Sponsor Public Hearing

Any organization intending to request CDBG funds for physical improvements must conduct a public hearing. The purpose of the public hearing is to provide an opportunity for the general public to comment upon the proposals. The public hearing is also intended to allow the public to indicate other needs in the community which could possibly be addressed through the Community Development Program. These hearings are to be held prior to submitting funding

requests to the Redevelopment Authority for consideration. These public hearings are in addition to the public hearing held by the Redevelopment Authority.

Technical Assistance

The Redevelopment Authority will provide technical assistance to those groups or individuals demonstrating a need for help in completing the Funding Request forms. This may also include assistance with planning, undertaking, and completing an income survey in the proposed service area to qualify a proposed activity as fundable. If determined to be necessary, the Redevelopment Authority will conduct a workshop on how to prepare funding requests. This decision will be based on the number of potential applicants for Program funds that are unfamiliar with the process.

Deadline for Submission of Completed Funding Requests

All municipalities, civic organizations, county agencies, and social service agencies requesting Program funds must submit the completed Funding Request forms to the Redevelopment Authority office by a specified date and time.

Funding Request Review Process

Committee Training Workshop

The Redevelopment Authority may conduct a workshop for new members of the Community Development Steering Committee to instruct and prepare them for the project review process. The issues that may be discussed at the workshop include:

- The Congressional goals and objectives of the Programs;
- The purpose of citizen participation in the County's Programs;
- A review of the specific responsibilities of the Community Development Steering Committee;
- A review of the Funding Request forms to be completed by project sponsors;
- A review of the timetable of events; and
- Other presentations found to be appropriate such as a review of County plans and policies.

The Redevelopment Authority, in lieu of the training workshop, may choose to provide information prior to or during the first meeting of each Committee for the new fiscal year review process.

Review of Proposed Activities

The official review process of all proposed activities begins when the Redevelopment Authority staff reviews all Funding Request Applications submitted to determine their eligibility and fundability under the Programs' regulations.

The proposals are also reviewed to determine compliance with Lancaster County's local policies and to determine that they address the County's needs and objectives as identified in the five-year Consolidated Plan. The Redevelopment Authority completes a basic review of the municipal infrastructure improvement and community facility activities to ascertain the feasibility of the activities to resolve the documented problems and to verify the reasonableness of the construction cost estimates.

During this time, the Lancaster County Planning Commission reviews the proposed infrastructure improvement activities to determine their conformance with Lancaster County's *Places 2040*, and all other functional elements.

Redevelopment Authority will provide any staff evaluations of the proposed activities along with any Planning Commission comments and/or concerns to the Community Development Steering Committee.

Community Development Steering Committee Process

The Community Development Steering Committee interviews project sponsors of all activities except for public service programs. The Community Development Steering Committee ranks all projects on one priority list. The Steering Committee will meet generally for 1-5 weeks depending on the number of applicant presentations.

Please refer to earlier sections of this Plan for a more detailed discussion of the process.

Public Services Allocation Process

The 15% of CDBG funds permitted to be used for public services will be included in the joint allocation pool along with the County's Emergency Solutions Grant funds, the City of Lancaster ESG funds, the State Homeless Assistance Program funds and the United Way funds. The Lancaster County Homeless Coalition will administer the funding recommendation process for all of the funds in partnership with the Redevelopment Authority staff.

Homeless Services Allocation Process

As noted above, the Redevelopment Authority staff will coordinate and collaborate with the Lancaster County Homeless Coalition to administer the allocation process of Emergency

Solutions Grant (ESG) funds and CDBG funds for public services that are dedicated to homeless services.

Consolidated Annual Performance and Evaluation Report (CAPER)

The Redevelopment Authority staff will issue a notice to the public announcing the availability of the CAPER for review and comment. The legal notice will be published in the local newspaper and on the Redevelopment Authority's website. This notice opens the fifteen (15) day formal comment period.

Chapter 7 – Substantial Change Policy

Introduction

In accordance with the Consolidated Plan regulations , Lancaster County has developed a Substantial Change Policy statement. This policy statement establishes the criteria the County will use to determine what constitutes a substantial change in the content of the Consolidated Plan, Annual Action Plan or in the purpose, scope, location or beneficiaries of a project and/or activity funded under its Programs. A substantial change will be defined as follows:

- The addition, deletion or significant revision to existing goals, objectives or strategies included in the Consolidated Plan.
- The addition or deletion of a project and/or activity included in an Annual Action Plan.
- The appropriation of additional Program funds to a project and/or activity or transfer of Program funds between activities which is greater than 25% of the original activity appropriation.
- A significant revision to an activity included in an Annual Action Plan as follows:
 - A change in the national objective which an activity is designed to address.
Example: An activity that was originally designed to principally benefit low- and moderate- income persons will be redesigned to eliminate a slum or blight condition.
 - A change in the intended beneficiaries of an activity or program.
Example: An activity that was originally designed to provide services to senior citizens exclusively has been amended to benefit the entire community including children, youth and adults.
 - A change in the physical location or scope of an activity that would have an impact on those affected by the activity.
Example: Changing the location of a proposed community park from one neighborhood to another neighborhood or deciding to reconstruct a street other than the one proposed in the funding request.

Procedures

The procedure outlined below must be followed if a Program-funded activity is substantially changed as outlined above.

Public Notice

Prior to approving a substantial change to an activity funded through the County's Programs in any given fiscal year, the Redevelopment Authority will publish a notice of the proposed change. This public notice will be placed in the Legal Notice section of the LNP at least fourteen (14) calendar days prior to the date action will be taken to approve the change. The proposed change will also be published as part of the agenda of the Redevelopment Authority Board meeting.

All comments received will be evaluated and, if appropriate, modifications will be made to the change prior to approval.

Amendments

An amended Consolidated Plan and/or Annual Action Plan will be available to the public at the office of the Redevelopment Authority of the County of Lancaster, 28 Penn square, Suite 200, Lancaster, PA 17603. A letter transmitting the approved changes will be submitted to HUD.

Questions

Any questions concerning this Citizen Participation Plan should be directed to the Redevelopment Authority of the County of Lancaster, 28 Penn Square, Suite 200 Lancaster, PA 17603, (717) 394-0793, and web at www.lchra.com.

Chapter 8 – Anti-Displacement Policy

Replacement Housing

In accordance with 24 CFR 570.606, Lancaster County will replace all occupied and/or vacant occupy-able low- and moderate-income dwelling units demolished or converted to a use other than low- and moderate-income housing as a direct result of any activity assisted with Program funds. All replacement housing will be provided within three (3) years of the commencement of the federally assisted activity. Before obligating or expending funds for such an activity, Lancaster County will make public and submit to the Philadelphia Regional HUD office with a specific plan for the provision of necessary replacement housing.

Relocation Assistance - Lancaster County will also provide relocation assistance to each household displaced by such activities, also in accordance with 24 CFR 570.606. For each assisted activity, Lancaster County will take specific steps to minimize the potential displacement of persons from their homes.

Avoidance of Displacement

In general, it is the policy of Lancaster County to avoid the permanent displacement of residents. It is acknowledged that certain housing rehabilitation activities may require the temporary displacement of residents to complete the rehabilitation work.

Copy of Plan

A copy of the County's Anti-Displacement Policy and Relocation Assistance Plan is maintained for public review in the offices of the Redevelopment Authority, 28 Penn Square, Suite 200, Lancaster, PA 17603.

Chapter 9 – Citizen Participation Plan Amendments

This plan may be amended from time to time at the discretion of the Redevelopment Authority or the County of Lancaster. Amendments to the plan will be made available to the public in accordance with public notice procedures outlined in this Plan. A legal notice announcing an amendment will be published in the local newspaper (LNP) and on the Redevelopment Authority's website. This notice opens the fifteen (15) day formal comment period.

Chapter 10 – Temporary Citizen Participation Plan Amendments Due to CARES Act of 2020

The COVID-19 pandemic brought many changes to the administration of federal CARES Act funds, most specifically to the Citizen Participation requirements. HUD issued waivers regarding the method and timing of citizen participation for these funds and for Fiscal Year 2020 funds. For example, deadlines for plan submission were extended and virtual meetings were permitted to enable public comments. Due to the urgency of the pandemic and the need to provide the local community with access to much needed federal funds, the public comment period was reduced to no less than five (5) days. HUD outlined these waivers in the CPD Notice issued in early April of 2020 by John Gibbs, Assistant Secretary, Acting Director concerning *Availability of Waivers of Community Planning and Development (CPD) Grant Programs and Consolidated Plan Requirements to Prevent the Spread of COVID-19 and mitigate Economic Impacts caused by COVID-19*. This notice included the *CARES Act Flexibilities for CDBG Funds Used to Support Coronavirus Response Guide (Guide)*

The Guide describes the immediate availability of a 5-day public comment period for amendments and new plan submissions, uncaps the percentage of CDBG funding for public services to prevent, prepare for, and respond to coronavirus, as well as other flexibilities.

A summary of these waivers is listed below:

- Permits grantees to prepare substantial amendments to their most recent annual action plan, including their 2019 annual action plan. Grantees must identify the proposed use of all funds and how the funds will be used to prevent, prepare for, and respond to coronavirus.
- Eliminates the 15 percent cap on the amount of grant funds that can be used for public services activities.
- Provides that grantees may use CDBG-CV grant funds to cover or reimburse costs to prevent, prepare for, and respond to coronavirus incurred by a State or locality, regardless of the date on which such costs were incurred, when those costs comply with CDBG requirements.
- Provides that grantees may amend citizen participation plans to establish expedited procedures to draft, propose, or amend consolidated plans. Expedited procedures must include notice and reasonable opportunity to comment of no less than 5 days. The 5-day period can run concurrently for comments on the action plan amendment and amended

citizen participation plans. In-person public hearings are not required. Grantees may meet public hearing requirements with virtual public hearings if:

- 1) national/local health authorities recommend social distancing and limiting public gatherings for public health reasons; and
 - 2) virtual hearings provide reasonable notification and access for citizens in accordance with the grantee's certifications, timely responses from local officials to all citizen questions and issues, and public access to all questions and responses.
- Extends the deadline for grantees to submit action plans and other updates to their consolidated plans submissions for fiscal years 2019 and 2020 to August 16, 2021.