



# 2022 Annual Action Plan

**DRAFT**

v.2

**Bristol Township**  
Office of Community Development  
2501 Bath Road  
Bristol, PA 19007

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# Executive Summary

## AP-05 Executive Summary - 91.200(c), 91.220(b)

### 1. Introduction

Bristol Township, Pennsylvania is an entitlement community under the U.S. Department of Housing and Urban Development's (HUD) community Development Block Grant Program (CDBG). In compliance with HUD regulations, Bristol Township has prepared its PY 2022 Annual Action Plan for the period of July 1, 2022 through June 30, 2023. The PY 2022 Annual Action Plan (AAP) is a strategic guideline for the implementation of the Township's administration, housing, public services and public facility improvements activities. This is the third programming year of the Township's 2020-2024 Consolidated Plan.

During the PY 2022 Program Year, Bristol Township will receive a CDBG allocation of \$630,000 and anticipates no CDBG Program Income. Bristol Township proposes the following activities with the PY 2022 CDBG Funds:

Administration (20%): \$126,000

Public Facility & Infrastructure Improvements: \$259,500

Preserve Existing Housing Stock: \$150,000

Public Services (15%): \$94,500

The estimated allocation is based on the prior year allocation. The final PY 2022 CDBG grant allocation has not been announced yet, however the final budget will be 20% to admin, 15% to public services, \$150,000 towards housing rehab and the balance of funds towards public facilities and infrastructure.

### 2. Summarize the objectives and outcomes identified in the Plan

Bristol Township has developed its strategic plan based on an analysis of the data presented in this plan and the community participation and stake holder consultation process. Through these efforts, the Township has identified four priority needs and associated goals to address those needs. The priority needs include:

#### Expand/Improve Public Infrastructure & Facilities

1A Expand Public Facilities & Infrastructure: Expand public facilities and infrastructure through development activities for LMI persons and households. Activities can include adding ADA compliance for curb ramps and sidewalks, roadway expansion projects and neighborhood facilities and community centers.

#### Preserve Existing Housing Stock

2A Preserve Existing Homeownership Housing: Provide for owner occupied housing rehabilitation in the jurisdiction. These activities will benefit LMI households.

### **Public Services & Quality of Life Improvements**

3A Provide Supportive Services for Special Needs: The Township will provide supportive services for special needs populations such as senior services for the elderly, and homeless services for persons experiencing homelessness.

4A Provide Public Services for Community Needs: Provide vital public services for low/mod income residents. These include, after school programs, job training, leadership programs, health and life skills programing and prevention education.

### **Economic Development**

5A Provide Small Business Assistance: Provide economic development support using funds to assist small businesses to create and retain jobs.

In PY 2022, the Township will focus on public facilities and infrastructure improvements, public services and the preservation of the Township's housing.

## **3. Evaluation of past performance**

The Township and all the community and services organizations that work with its residents and businesses strive to improve the standards within the township across all aspects of life. With the help of federal, state and local grant funds, significant contributions have been made to the provision of safe and affordable housing, to the improvement of public facilities for the safety and enjoyment of all residents, and to improve the quality of life for low- and moderate-income individuals. As is the case in many low to moderate income municipalities, affordable housing remains one of the greatest needs of our township as documented by the current Consolidated Plan and the most recent PY 2020 Consolidated Annual Performance and Evaluation Report (CAPER). The following is a highlight of the accomplishments from the PY 2020 CAPER.

**Housing Rehabilitation** – The Township provided financial assistance to low-and moderate-income homeowners to repair emergencies to existing owner-occupied housing. Funds from this activity were used to pay for the administration of the housing program, along with direct emergency repair assistance for owner-occupied housing. During PY 2020, the Township assisted ten (10) LMI households.

**Public Facility & Infrastructure Improvements** – The Township worked to improve park facilities in low- and moderate-income areas. Specifically, improvements were made to JFK Park. Planning and engineering for this major park construction was completed. Plans include a new pavilion, restrooms, basketball courts and a soccer field, new walking paths and two new parking lots.

**Administration** – Funds from this activity were used for program management and oversight for the successful administration of Federal, State, and Local funded programs, including planning services for special studies, environmental clearance, fair housing, and compliance with all Federal, State, and Local laws and regulations.

COVID 19 restricted much of the work planned in PY 2020 and delayed. Most of the time and expenses were spent on creating CARES Act funding allocations and working with the Bucks County Community Development Department, the Bucks County Homeless Shelter and Bristol Township Senior Center needs.

#### **4. Summary of Citizen Participation Process and consultation process**

The Bristol Township Office of Community Development (BTOCD) is engaged in ongoing efforts to increase coordination amongst the complex network of public, private, and non-profit organizations that deliver housing and social services to the community. As the administrators of HUD's CDBG program, the Township acts as a hub for community and economic development in the area. Open lines of communication are maintained between the Township and the area's many non-profit and social service agencies. BTOCD regularly engages with the community in order to gain insight from the public on their views about housing and community development in the Township. BTOCD also consults with local and regional service providers, agencies, and planning organizations by way of interviews and meetings.

Bristol Township prepared its Annual Action Plan in compliance with the Township's Citizen Participation Plan. For PY 2022, the Township reached out to the community through a 30-day public comment period and a public hearing held at a Township Council Meeting. A summary of these outreach efforts are reported below:

- A 30-day comment period was advertised to begin on May 2, 2022 and end on May 31, 2022. The proposed plan was available online on the Township website and at the BTOCD office. Written comments could be sent to the contact information in the PR-05 of this plan.
- A public hearing was held at the Township Council Meeting on May 21, 2022 at 7:00PM. A presentation of the proposed AAP plan was made and comments were welcome. Township Council Meetings are held in the auditorium of the township building located at 2501 Bath Road.

#### **5. Summary of public comments**

All comments are welcome. At the end of the public comment period, comments from the public will be summarized and submitted with the AAP.

#### **6. Summary of comments or views not accepted and the reasons for not accepting them**

All comments are welcome. At the end of the public comment period, comments from the public will be summarized and submitted with the AAP.

## **7. Summary**

The PY 2022 AAP is the third programming year of the Township's 2020-2024 Consolidated Plan. The strategy of Bristol Township's AAP is to develop a viable community by promoting integrated approaches that provide decent housing, a suitable living environment, and expanded economic opportunities for low and moderate-income persons. The primary means towards this end is the development of partnerships among all levels of government and the private sector, including for profit and nonprofit organizations. The AAP is an application for PY 2022 CDBG funds under HUD's formula grant program. The PY 2022 AAP builds upon the Five-Year Consolidated Plan and is the strategic vision to be followed by the Township in carrying out federal programs that primarily benefits low- to moderate-income persons.

## **PR-05 Lead & Responsible Agencies - 91.200(b)**

### **1. Agency/entity responsible for preparing/administering the Consolidated Plan**

The following are the agencies/entities responsible for preparing the Consolidated Plan and those responsible for administration of each grant program and funding source.

<b>Agency Role</b>	<b>Name</b>	<b>Department/Agency</b>
CDBG Administrator	BRISTOL TOWNSHIP	Community Development Department

**Table 1 – Responsible Agencies**

### **Narrative**

Bristol Township’s Office of Community Development is the administrating agency for the CDBG program. The Office of Community Development prepares the Five-Year Consolidated Plan, Annual Action Plan, Environmental Review Records (ERR’s), the Consolidated Annual Performance Evaluation Report (CAPER), monitoring, pay requests, contracting, and oversight of the programs on a day to day basis. In addition, the Township has a consulting firm available to assist the Office.

### **Consolidated Plan Public Contact Information**

Van B. Strother, Community Development Director  
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(267) 812-3102

## **AP-10 Consultation - 91.100, 91.200(b), 91.215(l)**

### **1. Introduction**

Bristol Township coordinates and refers residents to the Bucks County Housing Authority, Bucks County Opportunity Council, housing providers, fair housing organizations, community and youth social services, Redevelopment Authority of Bucks County and Bucks County Community Development Department. Input from these consultations were used in the development of the specific goals and strategies to be addressed with PY 2022 CDBG funds.

### **Provide a concise summary of the jurisdiction's activities to enhance coordination between public and assisted housing providers and private and governmental health, mental health and service agencies (91.215(l)).**

Bristol Township is engaged in efforts and initiatives to enhance coordination between public and assisted housing providers, as well as private and governmental health, mental health, and social service agencies. The Township works with the following agencies to enhance funding and service allocations to address the housing and community development needs of the Township:

**Bucks County Housing Authority:** Manages the Public Housing and Section 8 Housing Choice Voucher Program, creates improvements to public housing communities, and develops affordable housing.

**Bucks County Opportunity Council:** Provides services to reduce poverty and promote economic self-sufficiency.

**Social Services Agencies:** Provides services to address the needs of low and moderate-income residents.

**Housing Providers:** Rehabilitates and develops affordable housing for low and moderate-income families and individuals.

**Bucks County CoC:** Oversees the Continuum of Care Network for Bucks County.

Collaboration and coordination with these entities will continue throughout the remaining Consolidated Plan period to capitalize on potential future funding opportunities.

### **Describe coordination with the Continuum of Care and efforts to address the needs of homeless persons (particularly chronically homeless individuals and families, families with children, veterans, and unaccompanied youth) and persons at risk of homelessness.**

Bucks County Department of Housing and Community Development is the lead agency for the Housing Continuum of Care of Bucks County (CoC), the organization responsible for the planning and

implementation of housing and homeless programs in Bucks County. The CoC membership includes representation by housing providers, mental health and drug and alcohol treatment providers, emergency shelters and outreach organizations, faith-based organizations, youth services, and other interested organizations. The Bucks County Department of Housing and Community Development is an active partner in the creation and implementation of the Bucks County Housing Link, the central point of information, assessment, and referral services for all Bucks County residents experiencing a housing crisis. Recently, Housing Link has undergone a thorough evaluation and upgrade to make it more responsive to the needs of the clients and the process Bucks County utilizes to address those needs.

As the Lead Agency, the Bucks County Department of Housing and Community Development submits the annual CoC Program application for funding on behalf of the CoC-funded agencies and regularly evaluates program performance.

**Describe consultation with the Continuum(s) of Care that serves the jurisdiction's area in determining how to allocate ESG funds, develop performance standards for and evaluate outcomes of projects and activities assisted by ESG funds, and develop funding, policies and procedures for the operation and administration of HMIS**

The Bucks County Department of Housing and Community Development also collaborates with the CoC Executive Committee to implement and evaluate Emergency Solutions Grant (ESG) funded programs.

Data from the Housing Link is used by the CoC to identify and serve the highest need populations. The Bucks County Department of Housing and Community Development and CoC regularly evaluate performance measures and outcomes for programs funded through the CoC and ESG programs. This evaluation assists the Bucks County Department of Housing and Community Development to determine the needs of homeless persons, identify system and service gaps, and allocate limited resources.

The Bucks County Department of Housing and Community Development actively provides leadership and coordinates with the CoC in the implementation of the ESG program. The Bucks County Department of Housing and Community Development administers and monitors all ESG-funded projects including those funded through the ESG entitlement program and those that are awarded through Pennsylvania's competitive ESG program. ESG funding is used to provide emergency shelter operations, rapid re-housing, and homeless prevention services. The application, review and ranking process for ESG funding is facilitated by the Bucks County Department of Housing and Community Development. ESG funding announcements are coordinated through the CoC and include a discussion of eligible activities, available funding, and a timeline for application and implementation. Bristol Township does not receive ESG funding.

The CoC Executive Committee provides input into the selection of ESG projects for approval and the CoC Outcomes Subcommittee assists with evaluating ESG outcomes based on the performance standards developed for the program.

**2. Agencies, groups, organizations and others who participated in the process and consultations**

**Table 2 – Agencies, groups, organizations who participated**

1	<b>Agency/Group/Organization</b>	Bucks County Housing Authority
	<b>Agency/Group/Organization Type</b>	Housing PHA Services - Housing
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Public Housing Needs Non-Homeless Special Needs Economic Development
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	The Bucks County Housing Authority continues to be engaged with the Township to determine the housing and community development needs in Bristol Township.
2	<b>Agency/Group/Organization</b>	Bucks County Department of Housing and Community Development
	<b>Agency/Group/Organization Type</b>	Services-homeless Other government - County
	<b>What section of the Plan was addressed by Consultation?</b>	Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Homelessness Strategy
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	The Bucks County Department Housing and Community Development continues to be engaged with the Township on the housing and community development needs in Bristol Township. Bucks County Department of Housing and Community Development is the lead agency for the Housing Continuum of Care of Bucks County (CoC).
3	<b>Agency/Group/Organization</b>	Habitat for Humanity of Bucks County
	<b>Agency/Group/Organization Type</b>	Housing
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Public Housing Needs

	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Bristol Township continues to be engaged with Habitat for Humanity on housing projects in the Township and ways to better direct funds and attention.
4	<b>Agency/Group/Organization</b>	FAMILY SERVICES ASSOCIATION OF BUCKS COUNTY
	<b>Agency/Group/Organization Type</b>	Housing Services - Housing Services-Persons with Disabilities Services-Persons with HIV/AIDS Services-homeless Services-Health
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Homelessness Strategy
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Bristol Township continues to be engaged with the Family Services Association of Bucks County to discuss affordable housing needs in Bristol Township.
5	<b>Agency/Group/Organization</b>	Bucks County Planning Commission
	<b>Agency/Group/Organization Type</b>	Other government - County Planning organization Business Leaders
	<b>What section of the Plan was addressed by Consultation?</b>	Economic Development
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Bristol Township continues to be engaged with the Bucks County Planning Commission on infrastructure and economic development.
6	<b>Agency/Group/Organization</b>	BUCKS COUNTY REDEVELOPMENT AUTHORITY
	<b>Agency/Group/Organization Type</b>	Housing Planning organization

	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Economic Development
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Bristol Township continues to be engaged with the RDA on economic development opportunities.
7	<b>Agency/Group/Organization</b>	BUCKS COUNTY OPPORTUNITY COUNCIL
	<b>Agency/Group/Organization Type</b>	Housing Services - Housing Services-homeless Services-Education Services-Employment
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Strategy
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	The Bucks County Opportunity Council includes a Housing Resource Center, Homeless Recharge Center, Economic Stability Center, Training Enterprise Center and Emergency Services that offers short-term assistance for individuals and families facing a crisis such as utility shut-off, transportation repair costs and food assistance.
8	<b>Agency/Group/Organization</b>	Bristol Township Senior Center
	<b>Agency/Group/Organization Type</b>	Services-Elderly Persons
	<b>What section of the Plan was addressed by Consultation?</b>	Anti-poverty Strategy
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Bristol Township met with the Senior Center to discuss building renovations and the service needs for the seniors.
9	<b>Agency/Group/Organization</b>	Lower Bucks Hospital
	<b>Agency/Group/Organization Type</b>	Services-Health Health Agency

	<b>What section of the Plan was addressed by Consultation?</b>	Anti-poverty Strategy
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Bristol Township continues to be engaged with the Lower Bucks Hospital on community development needs.
10	<b>Agency/Group/Organization</b>	Comcast
	<b>Agency/Group/Organization Type</b>	Services - Broadband Internet Service Providers Services - Narrowing the Digital Divide
	<b>What section of the Plan was addressed by Consultation?</b>	Non-Homeless Special Needs Anti-poverty Strategy
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	The Township discussed with Comcast to provide internet options for the community centers in the Bristol Township.
11	<b>Agency/Group/Organization</b>	Bristol Township Planning & Zoning Dept
	<b>Agency/Group/Organization Type</b>	Agency - Managing Flood Prone Areas
	<b>What section of the Plan was addressed by Consultation?</b>	Non-Homeless Special Needs Economic Development
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	The Township BTOCD continues to be engaged with the Planning & Zoning Dept on emergency mitigation and management of flood prone areas. The BTOCD continues to discuss proposed projects with the Floodplain Manager.

**Identify any Agency Types not consulted and provide rationale for not consulting**

N/A. All comments were welcome and there were no agency types not intentionally consulted.

**Other local/regional/state/federal planning efforts considered when preparing the Plan**

Name of Plan	Lead Organization	How do the goals of your Strategic Plan overlap with the goals of each plan?
Continuum of Care	Bucks County Housing & Community Development	The CoC is the primary provider of housing and supportive services for the area homeless and at risk of being homeless. The goals of the Strategic Plan are strategically linked and mutually supportive with the following goals of the CoC Strategic Plan: Reducing the Number of Homeless Individuals and Families, Shortening the Length of Time Spent Homeless, Increasing Employment Among Homeless Individuals, and Increasing the Number of Permanent Affordable Housing Units Available.

**Table 3 - Other local / regional / federal planning efforts**

**Narrative**

The strategy of Bristol Township's Annual Action Plan is to develop a viable community by promoting integrated approaches that provide decent housing, a suitable living environment, and expanded economic opportunities for low and moderate-income persons. The primary means towards this end is the development of partnerships among all levels of government and the private sector, including for profit and nonprofit organizations. The Annual Action Plan is an application for PY 2022 CDBG funds under HUD's formula grant program. The Annual Action Plan combined with the Five-Year Consolidated Plan act as a strategic vision to be followed by the Township in carrying out federal programs that primarily benefits low to moderate income persons.

**AP-12 Participation - 91.401, 91.105, 91.200(c)**

**1. Summary of citizen participation process/Efforts made to broaden citizen participation  
Summarize citizen participation process and how it impacted goal-setting**

Bristol Township prepared its Annual Action Plan in compliance with the Township's Citizen Participation Plan. For PY 2022, the Township reached out to the community through a 30-day public comment period and a public hearing held at a Township Council Meeting. A summary of these outreach efforts are reported below in the citizen participation outreach table.

**Citizen Participation Outreach**

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL
1	Public Comment Period	Non-targeted/broad community	A 30-day comment period was advertised to begin on May 2, 2022 and end on May 31, 2022. The proposed plan was available online on the Township website and at the BTOCD office. Written comments could be sent to the contact information in the PR-05 of this plan. The plan can be viewed on the Township website at: <a href="https://www.bristoltownship.org/dced.cfm">https://www.bristoltownship.org/dced.cfm</a>	All comments are welcome.	All comments are welcome.	N/A
2	Public Hearing	Non-targeted/broad community	A public hearing was held at the Township Council Meeting on May 21, 2022 at 7:00PM. A presentation of the proposed AAP plan was made and comments were welcome. Township Council Meetings are held in the auditorium of the township building located at 2501 Bath Road.	All comments are welcome.	All comments are welcome.	N/A

**Table 4 – Citizen Participation Outreach**

## Expected Resources

### AP-15 Expected Resources - 91.420(b), 91.220(c)(1,2)

#### Introduction

Bristol Township anticipates it will receive \$630,000 as its CDBG allocation for PY 2022. The Township does not expect to receive any Program Income during the program year. The Township’s PY 2022 CDBG program year starts on July 1, 2022 and concludes on June 30, 2023. The following financial resources will be used to address the following priority needs: Housing Preservation; Public Facilities & Infrastructure Improvements; Public Services; and Administration, Planning, and Management.

The estimated allocation is based on the prior year allocation. The final PY 2022 CDBG grant allocation has not been announced yet, however the final budget will be 20% to admin, 15% to public services, \$150,000 towards housing rehab and the balance of funds towards public facilities and infrastructure.

#### Anticipated Resources

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
CDBG	public - federal	Acquisition Admin and Planning Economic Development Housing Public Improvements Public Services	630,000	0	0	630,000	1,260,000	The expected amount available for the remainder of the ConPlan is 2x more years of the annual allocation.

**Table 5 - Expected Resources – Priority Table**

**Explain how federal funds will leverage those additional resources (private, state and local funds), including a description of how matching requirements will be satisfied**

In addition to the funds noted above, the Township has been fortunate to receive/implement within the Consolidated Planning period:

Bristol Township received a Multi Modal Transportation Grant PennDOT Grant for Route 13 Beautification Phase III for new sidewalks, curbs, installation of ADA curb ramps and pedestrian crossings, street lighting and stormwater management in the amount of \$884,600 with a 30% Township match.

The Township, working with the Redevelopment Authority of Bucks County, has also budgeted \$400,000 for the removal of blighted abandoned dwellings and buildings throughout the Township. The Township has reduced vacant homes in the Township from 208 down to 30 since 2016.

The Township received three traffic signal upgrade improvement grants awarded through PennDOT in the amount of \$925,900.

The Township utilized a \$1 million Bucks County Open Space Grant to purchase four adjacent properties to the Municipal Complex and built a \$7.5 million-dollar Municipal Park with a walking trail, amphitheater, turf field, softball field, spray park, ADA playground, and concession stand. A \$265,000 grant was received from DCED for the spray park.

Bristol Township awarded the upgrade to the Croydon Wastewater Treatment Plant for a total contract amount of \$5,150,872. Groundbreaking is anticipated this summer with the project length totaling 12-18 months. In addition, Bristol Township has been televising its 18 Pump Station service areas for Inflow and Infiltration. Work has begun on slip lining and specifications are being produced for areas requiring pipe replacing. The Croydon Treatment Plant conveyance system is 50+ years old.

**If appropriate, describe publicly owned land or property located within the jurisdiction that may be used to address the needs identified in the plan**

JFK is a municipally owned park where major improvements will be completed with CDBG funds. Additionally, three parks will undergo structure upgrades.

Bristol Township has also televised its 18 Pump Station service areas for Inflow and Infiltration. Work has begun on slip lining and specifications

are being produced for areas requiring pipe replacing. The Croydon Treatment Plant conveyance system is 50+ years old. The section of piping along Bath Road in the Silver Lake Pump Station service area.

Township infrastructure such as roads and ADA curb ramps and intersections will continue to benefit from the strategies identified in the plan. In recent years, the Township has benefitted from milling and resurfacing of an additional 3 miles roads for a total contract price of \$537,975. Bristol Township also began the development and planning of construction for ADA curb ramps intersections in 2021.

## **Discussion**

The program year goes from July 1, 2022 through June 30, 2023. CDBG funds will be used to address the following priority needs:

- Public Facility & Infrastructure Improvements
- Preserve Existing Housing Stock
- Public Services & Quality of Life Improvements
- Administration

## Annual Goals and Objectives

### AP-20 Annual Goals and Objectives - 91.420, 91.220(c)(3)&(e)

#### Goals Summary Information

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
1	1A Expand Public Facilities & Infrastructure	2020	2024	Non-Housing Community Development	Area Wide	Expand/Improve Public Infrastructure & Facilities	CDBG: \$291,000	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 1645 Persons Assisted
2	2A Preserve Existing Homeownership Housing	2020	2024	Affordable Housing	Area Wide	Preserve Existing Housing Stock	CDBG: \$181,500	Homeowner Housing Rehabilitated: 15 Household Housing Unit
3	3A Provide Supportive Services for Special Needs	2020	2024	Non-Housing Community Development	Area Wide	Public Services & Quality of Life Improvements	CDBG: \$78,750	Public service activities other than Low/Moderate Income Housing Benefit: 300 Persons Assisted
4	4A Public Services & Quality of Life Improvements	2020	2024	Non-Housing Community Development	Area Wide	Public Services & Quality of Life Improvements	CDBG: \$78,750	Public service activities other than Low/Moderate Income Housing Benefit: 300 Persons Assisted

**Table 6 – Goals Summary**

## Goal Descriptions

1	<b>Goal Name</b>	1A Expand Public Facilities & Infrastructure
	<b>Goal Description</b>	Public improvements will include neighborhood facilities improvements and upgrades, homeless facilities improvements and improvements to park facilities and equipment.
2	<b>Goal Name</b>	2A Preserve Existing Homeownership Housing
	<b>Goal Description</b>	The Township will provide for owner occupied housing needs for emergency repairs such as sewer replacements and upgrades, roofing, electrical, additional plumbing or heating/ventilation or other repair. These activities will benefit LMI households.
3	<b>Goal Name</b>	3A Provide Supportive Services for Special Needs
	<b>Goal Description</b>	The Township will provide supportive services for special needs populations such as senior services for the elderly, and homeless services for persons experiencing homelessness.
4	<b>Goal Name</b>	4A Public Services & Quality of Life Improvements
	<b>Goal Description</b>	Provide public services for low- to moderate-income residents. These include, after school programs, job training, leadership programs, health and life skills programing and prevention education.

## AP-35 Projects - 91.420, 91.220(d)

### Introduction

The estimated allocation is based on the prior year allocation. The final PY 2022 CDBG grant allocation has not been announced yet, however the final budget will be 20% to admin, 15% to public services, \$150,000 towards housing rehab and the balance of funds towards public facilities and infrastructure.

In order to address the priority needs of Bristol Township, the proposed PY 2022 Annual Action Plan proposes the following:

#	Project Name
1	CDBG: Administration (20%)
2	CDBG: Public Facilities & Infrastructure
3	CDBG: Housing Rehab
4	CDBG: Public Services

**Table 7 – Project Information**

### **Describe the reasons for allocation priorities and any obstacles to addressing underserved needs**

CDBG funds are intended to provide low- and moderate-income households with viable communities, including decent housing, suitable living environments and expanded economic opportunities. Eligible activities included in the allocation include public facility and infrastructure improvements, housing rehabilitation, affordable housing, public services for low- to moderate-income residents and special needs groups, economic development, and planning and administration.

Due to limited funding, not all priorities can be addressed each year of the Consolidated Plan period. For PY 2022, the Township will focus on public facility and infrastructure improvements, public services and housing rehabilitation.

## AP-38 Project Summary

### Project Summary Information

1	<b>Project Name</b>	CDBG: Administration (20%)
	<b>Target Area</b>	Area Wide
	<b>Goals Supported</b>	1A Expand Public Facilities & Infrastructure 2A Preserve Existing Homeownership Housing
	<b>Needs Addressed</b>	Expand/Improve Public Infrastructure & Facilities Preserve Existing Housing Stock
	<b>Funding</b>	CDBG: \$126,000
	<b>Description</b>	Administration of the CDBG program throughout the Township in PY 2022.
	<b>Target Date</b>	6/30/2023
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	N/A. Admin of the CDBG program.
	<b>Location Description</b>	Area Wide.
	<b>Planned Activities</b>	Administration of the CDBG program throughout the Township in PY 2022 (21A).
2	<b>Project Name</b>	CDBG: Public Facilities & Infrastructure
	<b>Target Area</b>	Area Wide
	<b>Goals Supported</b>	1A Expand Public Facilities & Infrastructure
	<b>Needs Addressed</b>	Expand/Improve Public Infrastructure & Facilities
	<b>Funding</b>	CDBG: \$259,500
	<b>Description</b>	The Township will fund activities that improve public facilities and infrastructure in Bristol Township. These public improvements will benefit LMI households in Low/Mod areas.
	<b>Target Date</b>	6/30/2023
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 1645 Persons Assisted
	<b>Location Description</b>	Township Wide, Eligible Low/Mod Block Group: 1003.03

	<b>Planned Activities</b>	Planned activities for public improvements include: Township Facility at Schumacher Dr. / Commercial Kitchen Outfitting (03E): \$189,500 Township Playgrounds & Equipment (03F): \$50,000 Homeless Shelter Freezer (03C): \$20,000
<b>3</b>	<b>Project Name</b>	CDBG: Housing Rehab
	<b>Target Area</b>	Area Wide
	<b>Goals Supported</b>	2A Preserve Existing Homeownership Housing
	<b>Needs Addressed</b>	Preserve Existing Housing Stock
	<b>Funding</b>	CDBG: \$150,000
	<b>Description</b>	Provide for owner occupied emergency housing repairs area wide. These activities will benefit LMI households.
	<b>Target Date</b>	6/30/2023
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	Homeowner Housing Rehabilitated: 15 Household Housing Unit
	<b>Location Description</b>	Area wide, application and need based for low to moderate income households.
	<b>Planned Activities</b>	Provide for owner occupied emergency housing repairs area wide. These activities will benefit LMI households. (14A)
<b>4</b>	<b>Project Name</b>	CDBG: Public Services
	<b>Target Area</b>	Area Wide
	<b>Goals Supported</b>	3A Provide Supportive Services for Special Needs 4A Public Services & Quality of Life Improvements
	<b>Needs Addressed</b>	Public Services & Quality of Life Improvements
	<b>Funding</b>	CDBG: \$94,500
	<b>Description</b>	Provide for public services that improve the quality of life for LMI and special needs persons in the Township. Public services has a grant cap and will not exceed 15% of the CDBG allocation.
	<b>Target Date</b>	6/30/2023
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	Public service activities other than Low/Moderate Income Housing Benefit: 600 Persons Assisted

<b>Location Description</b>	Area wide, application and need based for low to moderate income persons.
<b>Planned Activities</b>	<p>Provide for public services for LMI and special needs.</p> <p>These include services for special needs such as the elderly (05A) and persons with a disability (05B).</p> <p>LMI services include youth programs (05D), job/employment training (05H), and health services (05M &amp; 05O).</p>

## **AP-50 Geographic Distribution - 91.420, 91.220(f)**

### **Description of the geographic areas of the entitlement (including areas of low-income and minority concentration) where assistance will be directed**

Bristol Township will direct CDBG funds areawide for housing and community development needs meeting the required low- and moderate-income eligibility and target low- and moderate-income areas for public facility and infrastructure improvements. See below on how the Township will determine these areas.

#### **Geographic Distribution**

<b>Target Area</b>	<b>Percentage of Funds</b>
Area Wide	100

**Table 8 - Geographic Distribution**

#### **Rationale for the priorities for allocating investments geographically**

Bristol Township does not allocate funding based solely on geographic requirements. When the project or planned activities are intended to serve individuals or households directly, those individuals or households must meet income qualifications, as well as residency requirements, in order to receive assistance from the program. In these instances, BTOCD staff and/or one of its partner agencies shall complete an in-take and eligibility status review of the applicant individual, or household, before the project/activity is initiated.

Additionally, the Township has identified public facilities and infrastructure improvement activities. In which case, the planned public improvement activities will serve a community, neighborhood or “area”. These projects (or activities) are said to have an “area-wide” benefit. Per HUD requirements, these areas must be within an eligible Census Tract, as defined by HUD-CDBG regulations, whereby the majority of the residents are at least 51% low- to moderate-income.

To determine these Tracts the Township will be utilizing HUD CDBG Low Mod Income Summary Data (LMISD) from the HUD Exchange website, which has redefined the eligible tracts within the jurisdiction. The identified census block group tracts within the jurisdiction that are considered low-moderate income can be found on the HUD Exchange website at: <https://www.hudexchange.info/programs/acs-low-mod-summary-data/>

## **AP-75 Barriers to affordable housing -91.420, 91.220(j)**

### **Introduction**

Bristol Township will continue to monitor and review public policies for discriminatory practices and or impacts on housing availability in the Township. The Township will work towards and continue to be committed to removing or reducing barriers to the development of affordable housing whenever it is possible. A variety of actions include, among others, to reduce the cost of housing to make it affordable:

- Provide developers with incentives for construction of affordable housing
- Refer developers of affordable housing to the Bucks County HOME funding program
- Restructuring of fees for construction tap ins, plan review, etc.
- Modifying development standards to increase density
- Introduction of mixed-use district to promote new residential housing units with office and retail uses
- Encourage commercial and industrial economic development to maintain residential tax rates

### **Actions it planned to remove or ameliorate the negative effects of public policies that serve as barriers to affordable housing such as land use controls, tax policies affecting land, zoning ordinances, building codes, fees and charges, growth limitations, and policies affecting the return on residential investment**

Township staff will continue to review the rate at which residential real estate taxes escalate through cooperation with Bucks County and the Bristol Township School District. The county passed the Local Economic Revitalization Tax Assistance Act (“LERTA”), which encourages the development and expansion of commercial and industrial enterprises throughout the county. Through these efforts, the County and its municipalities hope to stabilize the tax base through increased economic activity. The LERTA program encourages the removal reuse or redevelopment of abandoned and/or dilapidated commercial and industrial property throughout Bucks County.

Due to the lack of available and vacant parcels, new residential development is unlikely, though there have been some inquiries on small parcels that are promising. The Township will continue to provide for the rehabilitation of the existing affordable housing stock as well as the removal of dilapidated and blighted structures.

### **Discussion**

The Township will continue to promote Fair Housing, including tenant rights, throughout the jurisdiction. Many jurisdictions have passed “source of income” regulations that prohibit housing discrimination based on the source of income provided by the applicant/tenant. Staff will explore such an ordinance for the Township as part of the upcoming Consolidated Planning efforts.

## **AP-85 Other Actions - 91.420, 91.220(k)**

### **Introduction**

This section outlines actions planned by the Township to address the needs of underserved populations, maintain affordable housing, reduce lead based paint hazards, reduce the number of poverty level households as well as the improvement of the institutional delivery structure.

### **Actions planned to address obstacles to meeting underserved needs**

The Township will target LMI individuals and households through the CDBG program, however there are two groups that are in particular need of assistance. The following is a description of the actions that will be taken to address the needs of the elderly/aging population and persons with a disability.

#### Assistance to an Aging Population:

- Housing rehabilitation.
- Support for the Senior Citizens Center and its programs.
- Institution of LERTA to encourage the development of non-residential tax rate tables, reducing reliance on residential tax revenues by local government and the schools.

#### Assistance to Disabled and Disadvantaged:

- Support for the mentally and physically challenged through education, facilities, social services and the removal of architectural barriers.
- Support for Veteran's associations serving the needs of disabled veterans.
- Support for adult day care services.

### **Actions planned to foster and maintain affordable housing**

The Township's inclusion in the Bucks County HOME Consortium increases the funding available to increase affordable housing options in Bristol Township, and also allows the Township to encourage the development of affordable housing with that source of gap financing. The current AAP will provide CDBG funding to assist in the rehabilitation of existing owner-occupied units for low/moderate income families.

Furthermore, the Township works with developers and the local housing authority to avoid the displacement of current residents by not approving projects which require demolition of standard units or units that are capable of being rehabilitated to a standard condition without comparable replacement.

## **Actions planned to reduce lead-based paint hazards**

Due in part to very limited funding and based on the Township's experience through the Owner-Occupied Housing Rehabilitation Program, it is estimated that less than 2% of all units occupied by extremely low, very low, and other low-income households may be contaminated with lead-based paint. Given this expectation, it is a policy of the Department to avoid disturbing paint. Therefore, homes built prior to 1979, are always tested for lead-based paint in areas where work will be done. If lead based paint is detected and when feasible, efforts will be made to encapsulate the hazardous materials. Unfortunately, encapsulation is not always a sufficient remedy for the removal of lead-based paint hazards. In such cases, homeowners are referred to the Bucks County Department of Health. However, all homeowners and potential renters or homebuyers are provided with a HUD approved pamphlet which outlines the hazards and risks associated with lead-based paint. Problems that are above and beyond avoiding lead-based paint or encapsulating such problems are referred to the Bucks County Department of Health.

## **Actions planned to reduce the number of poverty-level families**

Economic development and the alleviation of poverty, as well as the reduction of housing problems, go hand-in-hand. Bristol Township has been actively pursuing methods which will bring more employment opportunities to the Township. When assistance is provided by the Township in these endeavors, new and/or expanding enterprises are strongly encouraged to consider Township residents first in the hiring procedures and those persons who reside in low/moderate income areas of the Township or who may be considered low income. The Township has undertaken or will undertake the following activities:

- Opportunity Zone: Parts of Bristol Township are included in the Opportunity Zone and the Township expects to capitalize on these zones. We will work with any developer coming in to take advantage of this program.
- Transportation and Community Development Initiative (TCDI) Report: The Bucks County Planning Commission, with a grant from the Delaware Valley Planning Commission, recently completed and TCDI report, which helps the Township understand the economic impacts of the I-95/PA Turnpike interchange connection and develop an economic vision to reinvigorate the industrial and retail base of the Township.
- Department of Community and Economic Development: Bristol Township will continue to seek the support and grant assistance available through the Pennsylvania Department of Community and Economic Development.
- Enterprise Zone: Bristol Township has participated with the County of Bucks and the County Redevelopment Authority in identifying more than a 1,000 acres of Township land as an Enterprise Zone. The Enterprise Zone includes numerous former industrial areas which are now considered brownfield sites.
- LERTA: Bristol Township has partnered with Bucks County and the Bristol Township School District to adopt a Local Economic Revitalization Tax Assistance Act ("LERTA") which authorizes

local taxing authorities to exempt from real estate taxation, for specific periods, the assessed valuation of improvements to industrial, commercial and other business property. Bristol Township's LERTA will allow the increase in real estate taxes to be phased in over a five-year period (first year - 20% of the increase; second year -40%, etc.).

### **Actions planned to develop institutional structure**

The Bristol Township Office of Community Development will coordinate activities among the public and private agencies and organizations in the Township. This coordination will ensure that the goals and objectives outlined in the PY 2020-2024 Five Year Consolidated Plan will be effectively addressed by more than one agency. The staff of the Office of Community Development will facilitate and coordinate the linkage between these public and private partnerships and develop new partnership opportunities in the Township.

This coordination and collaboration between agencies is important to ensure that the needs of the residents of Bristol Township are being addressed. The main agencies that are involved in the implementation of the Plan, as well as additional financial resources that are available:

**Public Agencies:** Bristol Township Office of Community Development is responsible for administration of the CDBG program and Bucks County Housing Authority is responsible for administering Housing Choice Vouchers and public housing units

**Nonprofit Agencies:** There are several nonprofit agencies that serve low income households in the Township. The Township continued to collaborate with these agencies.

**Private Sector:** The private sector is a key collaborator in the services and programs associated with the Five-Year Consolidated Plan. The private sector brings additional financial resources and expertise that can be used to supplement existing services in the Township. Examples of these private sectors are; local lenders, affordable housing developers, business owners, community development organizations, healthcare organizations, and others.

The Township will continue to collaborate with local financial institutions, private housing developers, local realtors, etc.

### **Actions planned to enhance coordination between public and private housing and social service agencies**

As Federal funding allocations continue to decline it has become imperative that the Township work closely with Bucks County, the Bucks County Public Housing Authority and the Bucks County Continuum of Care. As such, Township staff will continue to work closely with these organization in an effort to improve agency coordination and reduce the duplication of programs and services offered across the county.

## Discussion

The Office of Community Development has the primary responsibility for monitoring the Township's Consolidated Plan and Annual Action Plan. The BTOCD maintains records on the progress toward meeting the goals and the statutory and regulatory compliance of each activity. Service area documentation is achieved through scheduling activities, drawdown of funds, and maintenance of budget spread sheets which indicate the dates of expenditures. Program modifications are considered if project activities are not able to be completed within the allowable time limits of the grant. The BTOCD is also responsible for the ongoing monitoring of any subrecipients for similar compliance.

The Township's responsibility is to ensure that Federal Funds are used in accordance with all program requirements, determining the adequacy of performance under subrecipient agreements; and taking any appropriate action when performance problems arise with subrecipients. The BTOCD has developed a "monitoring checklist" that is utilized when programs and activities are reviewed.

CDBG funded activities are monitored periodically, during the construction phase and a final inspection is performed which details the cost benefit and benefit to low/moderate income persons. During the onsite inspections, compliance with the local building and housing codes are reviewed. Copies of financial statements and audit reports are required and kept on file. For those activities, which trigger Davis Bacon Wage Rates, employee payrolls are required prior to payment and on-site employee interviews will be held.

## Program Specific Requirements

### AP-90 Program Specific Requirements - 91.420, 91.220(l)(1,2,4)

#### Introduction

Bristol Township will receive an annual allocation of CDBG funds in the amount of \$630,000 for PY 2022. There will be no program income received for the CDBG program.

#### Community Development Block Grant Program (CDBG) Reference 24 CFR 91.220(l)(1)

Projects planned with all CDBG funds expected to be available during the year are identified in the Projects Table. The following identifies program income that is available for use that is included in projects to be carried out.

1. The total amount of program income that will have been received before the start of the next program year and that has not yet been reprogrammed	0
2. The amount of proceeds from section 108 loan guarantees that will be used during the year to address the priority needs and specific objectives identified in the grantee's strategic plan.	0
3. The amount of surplus funds from urban renewal settlements	0
4. The amount of any grant funds returned to the line of credit for which the planned use has not been included in a prior statement or plan	0
5. The amount of income from float-funded activities	0
<b>Total Program Income:</b>	<b>0</b>

#### Other CDBG Requirements

1. The amount of urgent need activities	0
2. The estimated percentage of CDBG funds that will be used for activities that benefit persons of low and moderate income. Overall Benefit - A consecutive period of one, two or three years may be used to determine that a minimum overall benefit of 70% of CDBG funds is used to benefit persons of low and moderate income. Specify the years covered that include this Annual Action Plan.	100.00%