Bristol Township
Community Development Department

2019 Annual Action Plan
June 24, 2018

CARES ACT Amendment
July 14, 2020
Executive Summary

AP-05 Executive Summary - 24 CFR 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 FY 2019 Annual Action Plan for the period of July 1, 2019 through June 30, 2020. The FY 2019 Annual Action Plan is a strategic guideline for the implementation of the Township’s administration, housing and public facility improvements activities. This is the fifth and final Annual Action Plan under the Township’s FY 2015-2019 Consolidated Plan.

During the FY 2019 Program Year, Bristol Township will receive a CDBG allocation of $602,959 and anticipates $0 in CDBG Program Income. Bristol Township proposes the following activities with the FY 2019 CDBG Funds:

- Administration: $120,591
- Housing: $100,000
- Public Facility Improvements: $382,368

This Action Plan also has been amended to included the spending plan for the COVID-19 CDBG funds allocated in April 2020 in response to the CARES Act. The allocation for Bristol Township for the COVID-19 pandemic is $374,312. Bristol Township proposes the following activities that will prepare for; respond to; or prevent COVID-19:

- Administration: $74,862
- Public Services: $299,450

2. Summarize the objectives and outcomes identified in the Plan

This could be a restatement of items or a table listed elsewhere in the plan or a reference to another location. It may also contain any essential items from the housing and homeless needs assessment, the housing market analysis or the strategic plan.
Bristol Township has identified three priority needs and nine goals to address those needs in the 2015-2019 Consolidated Plan. The priority needs include: 1) Improving Affordable Housing Options, 2) Providing for Suitable Living Environments and 3) Improving the Capacity of Area Housing and Community Service Providers. To provide for those needs, the goals for the 2019 FY and covid-19 funds are as follows:

Assist Home Owners with Needed Repairs
Promote Fair Housing
Provide for Special Needs Housing Opportunities
Reduce Hazards in Homes
Increase Capacity of Housing and Service Providers

CARES ACT Funding:

Provide support for the Bristol Township Senior Center
Provide support for the homeless shelter in Bristol Township
Provide emergency 3-month maximum rental and mortgage assistance to low-income households to prevent eviction due to COVID-19
Provide services and programs for youth in low-income areas to cope with COVID 19 repercussions
Provide services and programs for families in low-income areas to cope with COVID 19 repercussions

During the FY 2019 CDBG Program Year Bristol Township proposes to address the following priority need categories identified in its FY 2015 to 2019 Consolidated Plan:

Administration: There is a continuing need for planning, administration, management, and oversight of Federal, state, and local funded programs.

Housing: There is a need to improve the quality of the housing stock in the community by increasing the amount of decent, safe, sound, and accessible housing for homeowners, renters, and homebuyers that is affordable to low to moderate persons and families. Additionally, repairs to homes, as needed for low to moderate income, owner occupied residents will continue.

Fair Housing: Promote fair housing choice through education and outreach in the community.

Improve Public Facilities: Bristol Township is committed to improving the quality of life for its residents through improvements to public facilities. Renovations to the Bristol Township Senior Center will

Annual Action Plan 2019
Amended for CARES ACT

OMB Control No: 2506-0117 (exp. 06/30/2018)
improve the Township’s ability to respond to the senior population and expand the services that are offered. During the pandemic, it has become more apparent that the Township needs to provide increasing support to our seniors.

Responding to the COVID-19 crisis:

Bristol Township intends to use these funds to provide additional operational support to the Senior Center and the homeless shelter, provide additional food support to the elderly and low/mod population in order to respond to the increase in need, provide emergency 3-month maximum mortgage and rental assistance to low-income households to prevent eviction and provide services to youth and families dealing with any repercussions due to COVID-19.

3. Evaluation of past performance

This is an evaluation of past performance that helped lead the grantee to choose its goals or projects.

Each year the Township prepares its Consolidated Annual Performance Evaluation Report. This report is submitted within ninety (90) days after the start of the new program year. The FY 2018 CAPER will be submitted to HUD by the required deadline of September 30, 2019.

4. Summary of Citizen Participation Process and consultation process

Summary from citizen participation section of plan.

Bristol Township prepared its Annual Action Plan in compliance with the Township's Citizen Participation Plan. The Township held it’s required Public Hearing for the recommendation of the FY 2019 Action Plan submission as advertised on June 20, 2019.

For the CDBG-CV funds, HUD allowed a shortened public comment period and virtual public hearing. Bristol Township has amended its Citizen Participation Plan to allow for these altered
requirements. The public comment period was held between May 11-15, 2020, and the virtual public hearing was conducted on May 13, 2020.

5. **Summary of public comments**

This could be a brief narrative summary or reference an attached document from the Citizen Participation section of the Con Plan.

Bristol Township prepared its Annual Action Plan in compliance with the Township’s Citizen Participation Plan, an amended version of which is attached to this amendment. No public comments were received at either the virtual public hearing or during the comment period.

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

All comments were accepted. No comments were received.

7. **Summary**

The goal of the FY 2019 Annual Action Plan is to improve the living conditions for all residents of the Township, to create a suitable and sustainable living environment, and to address the housing and community development needs of the Township.

The FY 2019 Annual Action Plan presents activities the Township will undertake during the program year beginning July 1, 2019 and ending June 30, 2020. During the FY 2019 Program Year, Bristol Township, Pennsylvania anticipates CDBG Funds of $602,959 and CDBG Program Income of $0. Additional funds of $374,312 provided by the CARES Act in April 2020 are also included in this Annual Action Plan.

In light of the COVID-19 crisis, Bristol Township is striving to get funds available to social services organizations dealing with the brunt of the community needs in this stressful time. Bristol Township is utilizing the amended public comment period and shortened public planning process in order to respond as quickly as possible.
PR-05 Lead & Responsible Agencies – 91.200(b)

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

Describe the agency/entity responsible for preparing the Consolidated Plan and those responsible for administration of each grant program and funding source.

<table>
<thead>
<tr>
<th>Agency Role</th>
<th>Name</th>
<th>Department/Agency</th>
</tr>
</thead>
<tbody>
<tr>
<td>CDBG Administrator</td>
<td>BRISTOL TOWNSHIP</td>
<td>Community Development Department</td>
</tr>
</tbody>
</table>

Table 1 – Responsible Agencies

Narrative (optional)

Bristol Township’s Office of Community Development is the administering 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

Bristol Township
2501 Bath Road
Bristol, PA 19007
relton@bristoltownship.org
(267) 812-2914
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 FY 2019 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.

- **Family Service Association:** Manages the Bucks County Emergency Homeless Shelter in Bristol Township.

- **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 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 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 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 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 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 to determine the needs of homeless persons, identify system and service gaps, and allocate limited resources.

The Bucks County Department of Housing actively provides leadership and coordinates with the CoC in the implementation of the ESG program. The Bucks County Department of Housing 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. 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. **Describe Agencies, groups, organizations and others who participated in the process and describe the jurisdiction’s consultations with housing, social service agencies and other entities**
Table 2 – Agencies, groups, organizations who participated

<table>
<thead>
<tr>
<th></th>
<th>Agency/Group/Organization</th>
<th>Bucks County Housing Authority</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Agency/Group/Organization Type</td>
<td>Housing</td>
</tr>
<tr>
<td></td>
<td></td>
<td>PHA</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Services - Housing</td>
</tr>
<tr>
<td></td>
<td>What section of the Plan was addressed by Consultation?</td>
<td>Housing Need Assessment</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Homelessness Strategy</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Non-Homeless Special Needs</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Economic Development</td>
</tr>
<tr>
<td></td>
<td>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</td>
<td>The Bucks County Housing Authority was consulted to determine the housing and community development needs in Bristol Township.</td>
</tr>
<tr>
<td></td>
<td>Agency/Group/Organization</td>
<td>Bucks County Department of Housing and Community Development</td>
</tr>
<tr>
<td></td>
<td>Agency/Group/Organization Type</td>
<td>Services-homeless</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Other government - County</td>
</tr>
<tr>
<td></td>
<td>What section of the Plan was addressed by Consultation?</td>
<td>Homeless Needs - Chronically homeless</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Homeless Needs - Families with children</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Homelessness Needs - Veterans</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Homelessness Needs - Unaccompanied youth</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Homelessness Strategy</td>
</tr>
<tr>
<td></td>
<td>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</td>
<td>The Bucks County Department Housing and Community Development was consulted to determine the housing and community development needs in Bristol Township.</td>
</tr>
<tr>
<td></td>
<td>Agency/Group/Organization</td>
<td>HABITAT FOR HUMANITY</td>
</tr>
<tr>
<td></td>
<td>Agency/Group/Organization Type</td>
<td>Housing</td>
</tr>
</tbody>
</table>
| What section of the Plan was addressed by Consultation? | Housing Need Assessment  
Public Housing Needs |
<table>
<thead>
<tr>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</td>
<td>Bristol Township met with Habitat for Humanity to discuss several proposed housing projects in the Township.</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Agency/Group/Organization</th>
<th>FAMILY SERVICES ASSOCIATION</th>
</tr>
</thead>
</table>
| Agency/Group/Organization Type | Housing  
Services - Housing  
Services-Persons with Disabilities  
Services-Persons with HIV/AIDS  
Services-homeless  
Services-Health |

| What section of the Plan was addressed by Consultation? | Housing Need Assessment  
Homeless Needs - Chronically homeless  
Homeless Needs - Families with children  
Homelessness Needs - Veterans  
Homelessness Needs - Unaccompanied youth  
Homelessness Strategy |
<table>
<thead>
<tr>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</td>
<td>Bristol Township met with Family Services Association of Bucks County to discuss the shelter and affordable housing needs in Bristol Township.</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Agency/Group/Organization</th>
<th>Bucks County Planning Commission</th>
</tr>
</thead>
</table>
| Agency/Group/Organization Type | Other government - County Planning organization  
Business Leaders |
<table>
<thead>
<tr>
<th>Agency/Group/Organization</th>
<th>What section of the Plan was addressed by Consultation?</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Economic Development</td>
</tr>
<tr>
<td></td>
<td>Bristol Township has been working with the Bucks County Planning Commission on the Turnpike and I-95 connection and economic development potential.</td>
</tr>
</tbody>
</table>

**6 BUCKS COUNTY REDEVELOPMENT AUTHORITY**

- **Agency/Group/Organization Type**
  - Housing
  - Planning organization

<table>
<thead>
<tr>
<th>Agency/Group/Organization</th>
<th>What section of the Plan was addressed by Consultation?</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Housing Need Assessment Economic Development</td>
</tr>
<tr>
<td></td>
<td>Bristol Township has been working with the RDA on economic development opportunities.</td>
</tr>
</tbody>
</table>

**7 BUCKS COUNTY OPPORTUNITY COUNCIL**

- **Agency/Group/Organization Type**
  - Housing
  - Services - Housing
  - Services-homeless
  - Services-Education
  - Services-Employment

<table>
<thead>
<tr>
<th>Agency/Group/Organization</th>
<th>What section of the Plan was addressed by Consultation?</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Housing Need Assessment Homeless Needs - Chronically homeless Homeless Needs - Families with children Economic Development</td>
</tr>
</tbody>
</table>

OMB Control No: 2506-0117 (exp. 06/30/2018)
Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?

The Bucks County Opportunity Council opened the doors to a newly renovated 6,400 Opportunity Center in the Fall of 2018. This Center 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.

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

All required agency types were consulted.

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

<table>
<thead>
<tr>
<th>Name of Plan</th>
<th>Lead Organization</th>
<th>How do the goals of your Strategic Plan overlap with the goals of each plan?</th>
</tr>
</thead>
<tbody>
<tr>
<td>Continuum of Care</td>
<td>Bucks County Housing &amp; Community Development</td>
<td>The CoC is the primary provider of housing and supportive services for the areas 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.</td>
</tr>
</tbody>
</table>

Table 3 – Other local / regional / federal planning efforts

Narrative (optional)

The strategy of the Township of Bristol’s Annual Action Plan is to develop a viable community by promoting integrated approaches that provide decent housing, a suitable living environment, and expand 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 FY 2019 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 benefit low and moderate-income persons.
**AP-12 Participation – 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.

The Township held its required Public Hearing for the recommendation of the FY 2019 Action Plan submission as advertised, on June 20, 2019.

During the COVID-19 pandemic, several meetings and discussions were held with the Bristol Township Senior Center and Homeless Shelter Directors, as well as with area service providers to discuss the growing need to provide for PPE, cleaning supplies, technology improvements for communication while apart, laundry services and additional support staff and mental health services. An additional public hearing to address the amendments in this plan was held electronically on May 13, 2020.
## Citizen Participation Outreach

<table>
<thead>
<tr>
<th>Sort Order</th>
<th>Mode of Outreach</th>
<th>Target of Outreach</th>
<th>Summary of response/attendance</th>
<th>Summary of comments received</th>
<th>Summary of comments not accepted and reasons</th>
<th>URL (If applicable)</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>Public Hearing</td>
<td>Non-targeted/broad community</td>
<td>There was a public hearing at the Bristol Township Council Meeting on June 20, 2019 at 7:00 pm, located at the Bristol Township Municipal Building, 2501 Bath Road, Bristol, PA 19007. The meeting was open to the public. There was an additional public hearing on May 13, 2020 to discuss the CARES Act funding.</td>
<td>There were no comments received.</td>
<td>All comments were accepted.</td>
<td></td>
</tr>
<tr>
<td>3</td>
<td>Public Meeting</td>
<td>Specific Low Moderate Area</td>
<td>Twenty (20) people attended. All were in favor or removing the old equipment. Many expressed concerns about lighting and vandalism. Several park walk throughs with the Snowden Ave residents. Replacement structures and walking trail are desired.</td>
<td>All comments were accepted.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Sort Order</td>
<td>Mode of Outreach</td>
<td>Target of Outreach</td>
<td>Summary of response/attendance</td>
<td>Summary of comments received</td>
<td>Summary of comments not accepted and reasons</td>
<td>URL (If applicable)</td>
</tr>
<tr>
<td>------------</td>
<td>---------------------------</td>
<td>------------------------------------</td>
<td>-----------------------------------------------------------------------------------------------</td>
<td>-----------------------------</td>
<td>--------------------------------------------</td>
<td>---------------------</td>
</tr>
<tr>
<td>4</td>
<td>5-Day Public Comment Period</td>
<td>Non-targeted/broad community</td>
<td>In accordance with an amended Citizen Participation Plan to allow for a shortened public comment period in order to hasten changes to address the covid-19 crisis, a public comment period was held from May 11 - 15, 2020.</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>5</td>
<td>Public Meeting</td>
<td>Non-targeted/broad community</td>
<td>A virtual public hearing was held on May 13, 2020 to discuss the CARES Act funding. Several residents and some of our service providers attended.</td>
<td>No comments were received.</td>
<td>No comments were received.</td>
<td></td>
</tr>
</tbody>
</table>

Table 4 – Citizen Participation Outreach
Expected Resources

AP-15 Expected Resources – 91.220(c)(1,2)

Introduction

Bristol Township will receive $602,959 as its CDBG allocation for the FY 2019 Program Year. The Township does not expect to receive any Program Income during the FY 2019 Annual Action Plan period. The Township’s FY 2019 CDBG program year starts on July 1, 2019 and concludes on June 30, 2020. The Township will also receive a $374,312 allocation from the CARES Act. The following financial resources are identified for the FY 2019 Annual Action Plan and will be used to address the following priority needs: Housing; Public Facilities; Community Development; Public Services; and Administration, Planning, and Management. The accomplishments of these projects/activities will be reported in the FY
2018 Consolidated Annual Performance.

Anticipated Resources

<table>
<thead>
<tr>
<th>Program</th>
<th>Source of Funds</th>
<th>Uses of Funds</th>
<th>Expected Amount Available Year 1</th>
<th>Narrative Description</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td></td>
<td>Annual Allocation: $</td>
<td>Program Income: $</td>
</tr>
<tr>
<td>CDBG</td>
<td>public - federal</td>
<td>Acquisition Admin and Planning Economic Development Housing Public Improvements Public Services</td>
<td>602,959</td>
<td>0</td>
</tr>
<tr>
<td>Other</td>
<td>public - federal</td>
<td>Admin and Planning Public Services</td>
<td>374,312</td>
<td>0</td>
</tr>
</tbody>
</table>

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 Federal funding identified above, the Township is milling and resurfacing an additional 2.5 miles of in the Lakeland, Blue Ridge and Westwood Sections of the Township; approved contract at $536,043.
Bristol Township has also contracted and begun construction on 51 ADA curb ramps intersections for a contract price of $462,930.

Bristol Township received a PennDOT Grant for Route 13 Beautification Phase II for new sidewalks, curbs, installation of ADA curb ramps and pedestrian crossings, street lighting and stormwater management.

Bristol Township received a $250,000 Pennsylvania Department of Community and Economic Development (PADCED) grant for the Passive Park improvements at Cedar Avenue Park.

The Township, working with the Redevelopment Authority of Bucks County, has also budgeted $1 million dollars for the removal of blighted abandoned dwellings and buildings throughout the Township.

The Township has worked with the Bucks County Planning Commission and the Philadelphia Great Economy League and received an $80,000 TCDI Grant. A $20,000 match was required, with $10,000 from the BCPC and $10,000 from Bristol Township. The focus was economic development initiatives and development potential for when the Turnpike and I-95 Interstate connect in Bristol Township, together with looking at the zoning map and ordinances for enhancement. The report was recently completed and will be considered by the Council in June 2019.

Bristol Township received a grant from PADCED in the amount of $347,833 to replace the generator at the Township Wastewater Treatment Plant. Bristol Township has received its necessary approval from the PA Department of Environmental Protection for the $6 Million expansion and upgrade to the Wastewater Treatment Plant and hope to begin construction in the FY 2019 year.

Bristol Township is expanding the Municipal Complex and Recreation Facilities with a $6 Million expansion project that will include a turf football field, a practice field, a baseball field, concession stand, bathroom facility, walking trail, amphitheater, spray park and inclusive playground. Bristol Township received a $240,000 DCED grant for the spray park and is using its $1 Million Bucks County Open Space money for this project.
If appropriate, describe publically owned land or property located within the jurisdiction that may be used to address the needs identified in the plan

The township has undertaken the creation of a municipal park complex adjacent to the Bristol Township Senior Center. This new park is expected to increase the importance of the senior center to the Township's residents and the center is in need of renovations in order to address the expanding need. The current senior center is owned by the Township.

Discussion

The program year from July 1, 2019 through June 30, 2020. These funds will be used to address the following priority needs:

- Public Facility Improvements
- Housing
- Administration
- Public Services

CARES Act funding will provide Public Services and Administration
## Annual Goals and Objectives

### AP-20 Annual Goals and Objectives

#### Goals Summary Information

<table>
<thead>
<tr>
<th>Sort Order</th>
<th>Goal Name</th>
<th>Start Year</th>
<th>End Year</th>
<th>Category</th>
<th>Geographic Area</th>
<th>Needs Addressed</th>
<th>Funding</th>
<th>Goal Outcome Indicator</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>1A: Assist Homeowners with Needed Repairs</td>
<td>2015</td>
<td>2019</td>
<td>Affordable Housing</td>
<td></td>
<td>Providing for Suitable Living Environments</td>
<td>CDBG: $160,295</td>
<td>Homeowner Housing Rehabilitated: 13 Household Housing Unit</td>
</tr>
<tr>
<td>2</td>
<td>2C: Improve Public Facilities &amp; Infrastructure</td>
<td>2015</td>
<td>2019</td>
<td>Non-Housing Community Development</td>
<td></td>
<td>Providing for Suitable Living Environments</td>
<td>CDBG: $382,368</td>
<td>Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 600 Persons Assisted</td>
</tr>
<tr>
<td>3</td>
<td>3A: Increase Capacity of Area Service Providers</td>
<td>2015</td>
<td>2019</td>
<td>Non-Housing Community Development</td>
<td></td>
<td>Improving the Capacity of Area Service Providers</td>
<td>CARES Act: $299,450</td>
<td>Public service activities other than Low/Moderate Income Housing Benefit: 600 Persons Assisted</td>
</tr>
</tbody>
</table>

#### Table 6 – Goals Summary

#### Goal Descriptions

Annual Action Plan 2019
<table>
<thead>
<tr>
<th></th>
<th>Goal Name</th>
<th>Goal Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>1A: Assist Homeowners with Needed Repairs</td>
<td>Work with eligible owner-occupied home owners for emergency housing needs and repairs. If funds are available, work with affordable housing providers and builders to improve/rehab affordable units.</td>
</tr>
<tr>
<td>2</td>
<td>2C: Improve Public Facilities &amp; Infrastructure</td>
<td>Creation of JFK Park</td>
</tr>
<tr>
<td>3</td>
<td>3A: Increase Capacity of Area Service Providers</td>
<td>Providing funding to area service providers for food, housing and small business relief during the covid-19 pandemic.</td>
</tr>
</tbody>
</table>
Projects

AP-35 Projects – 91.220(d)

Introduction

In order to address the priority needs of Bristol Township, the proposed FY 2019 Annual Action Plan proposes the following:

### Projects

<table>
<thead>
<tr>
<th>#</th>
<th>Project Name</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>Administration</td>
</tr>
<tr>
<td>2</td>
<td>Public Facility Improvements</td>
</tr>
<tr>
<td>3</td>
<td>Housing Programs</td>
</tr>
<tr>
<td>4</td>
<td>CARES Act Public Service</td>
</tr>
<tr>
<td>5</td>
<td>CARES Act Administration</td>
</tr>
</tbody>
</table>

Table 7 - Project Information

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

CDBG funds are intended to provide lower and moderate-income households with viable communities, including decent housing, suitable living environments and expanded economic opportunities. Eligible activities included in the allocation proprieties include improving public facilities & infrastructure, housing repairs, affordable housing, and planning and administration. For the COVID-19 funds, will provide administration and public service operation and counseling.
AP-38 Project Summary

Project Summary Information
<table>
<thead>
<tr>
<th></th>
<th>Project Name</th>
<th>Target Area</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td><strong>Administration</strong></td>
<td></td>
</tr>
<tr>
<td></td>
<td><strong>Goals Supported</strong></td>
<td>1A: Assist Homeowners with Needed Repairs</td>
</tr>
<tr>
<td></td>
<td></td>
<td>2C: Improve Public Facilities &amp; Infrastructure</td>
</tr>
<tr>
<td></td>
<td><strong>Needs Addressed</strong></td>
<td>Providing for Suitable Living Environments</td>
</tr>
<tr>
<td></td>
<td><strong>Funding</strong></td>
<td>CDBG: $120,591</td>
</tr>
<tr>
<td></td>
<td><strong>Description</strong></td>
<td>Provide program management and oversight for the successful administration of Federal, state and local funded programs, including environmental clearance, fair housing and compliance with all Federal, state and local law regulations.</td>
</tr>
<tr>
<td></td>
<td><strong>Target Date</strong></td>
<td>6/30/2020</td>
</tr>
<tr>
<td></td>
<td><strong>Estimate the number and type of families that will benefit from the proposed activities</strong></td>
<td>N/A</td>
</tr>
<tr>
<td></td>
<td><strong>Location Description</strong></td>
<td>Township-wide</td>
</tr>
<tr>
<td></td>
<td><strong>Planned Activities</strong></td>
<td>Administration on activities related to the Action Plan and other required parts of the CDBG Program.</td>
</tr>
<tr>
<td>2</td>
<td><strong>Public Facility &amp; Infrastructure Improvements</strong></td>
<td></td>
</tr>
<tr>
<td></td>
<td><strong>Goals Supported</strong></td>
<td>2C: Improve Public Facilities &amp; Infrastructure</td>
</tr>
<tr>
<td></td>
<td><strong>Needs Addressed</strong></td>
<td>Providing for Suitable Living Environments</td>
</tr>
<tr>
<td></td>
<td><strong>Funding</strong></td>
<td>CDBG: $382,368</td>
</tr>
<tr>
<td></td>
<td><strong>Description</strong></td>
<td>Renovation of the Bristol Township Senior Center.</td>
</tr>
<tr>
<td></td>
<td><strong>Target Date</strong></td>
<td>6/30/2020</td>
</tr>
<tr>
<td></td>
<td><strong>Estimate the number and type of families that will benefit from the proposed activities</strong></td>
<td>Approximately 600 seniors who use the Senior Center will benefit from this activity.</td>
</tr>
<tr>
<td></td>
<td><strong>Location Description</strong></td>
<td>The Senior Center is located in the municipal complex at 2501 Bath Road, Bristol, PA 19007.</td>
</tr>
<tr>
<td></td>
<td><strong>Planned Activities</strong></td>
<td>This will include architectural and engineering activities and hard costs for the renovations.</td>
</tr>
<tr>
<td>Project Name</td>
<td>Housing Programs</td>
<td></td>
</tr>
<tr>
<td>----------------------</td>
<td>------------------</td>
<td></td>
</tr>
<tr>
<td><strong>Target Area</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Goals Supported</strong></td>
<td>1A: Assist Homeowners with Needed Repairs</td>
<td></td>
</tr>
<tr>
<td><strong>Needs Addressed</strong></td>
<td>Providing for Suitable Living Environments</td>
<td></td>
</tr>
<tr>
<td><strong>Funding</strong></td>
<td>CDBG: $100,000</td>
<td></td>
</tr>
<tr>
<td><strong>Description</strong></td>
<td>Rehabilitation and emergency repairs for owner occupied low and moderate residents in the Township, as well as working with housing providers.</td>
<td></td>
</tr>
<tr>
<td><strong>Target Date</strong></td>
<td>6/30/2020</td>
<td></td>
</tr>
<tr>
<td><strong>Estimate the number and type of families that will benefit from the proposed activities</strong></td>
<td>Approximately 13 low/mod households will benefit from this program.</td>
<td></td>
</tr>
<tr>
<td><strong>Location Description</strong></td>
<td>Township-wide</td>
<td></td>
</tr>
<tr>
<td><strong>Planned Activities</strong></td>
<td>Emergency Repairs for roofs, heaters, and sewer.</td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Project Name</th>
<th>CARES Act Public Service</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Target Area</strong></td>
<td></td>
</tr>
<tr>
<td><strong>Goals Supported</strong></td>
<td>3A: Increase Capacity of Area Service Providers</td>
</tr>
<tr>
<td><strong>Needs Addressed</strong></td>
<td>Improving the Capacity of Area Service Providers</td>
</tr>
<tr>
<td><strong>Funding</strong></td>
<td>CARES Act: $299,450</td>
</tr>
<tr>
<td><strong>Description</strong></td>
<td>Funding for area service providers addressing the covid-19 pandemic.</td>
</tr>
<tr>
<td><strong>Target Date</strong></td>
<td>6/30/2021</td>
</tr>
<tr>
<td><strong>Estimate the number and type of families that will benefit from the proposed activities</strong></td>
<td>It is anticipated that up to 1,000 low- and moderate-income families and seniors will benefit from the proposed activities.</td>
</tr>
<tr>
<td><strong>Location Description</strong></td>
<td></td>
</tr>
<tr>
<td><strong>Planned Activities</strong></td>
<td>The activities planned under this project include operational funding for the Bristol Township Senior Center and the Bucks County Emergency Homeless Shelter, food programs for seniors and low- and moderate-income households, and a rental assistance program for low- and moderate-income households.</td>
</tr>
<tr>
<td><strong>Project Name</strong></td>
<td>CARES Act Administration</td>
</tr>
<tr>
<td>Target Area</td>
<td></td>
</tr>
<tr>
<td>-------------</td>
<td>---</td>
</tr>
</tbody>
</table>
| **Goals Supported** | 2C: Improve Public Facilities & Infrastructure  
3A: Increase Capacity of Area Service Providers |
| **Needs Addressed** | Providing for Suitable Living Environments  
Improving the Capacity of Area Service Providers |
| **Funding** | CARES Act: $74,862 |
| **Description** | Administration for Covid-related projects and activities. |
| **Target Date** |  |
| **Estimate the number and type of families that will benefit from the proposed activities** | Effective administration of this grant will benefit all anticipated recipients. |
| **Location Description** |  |
| **Planned Activities** |  |
AP-50 Geographic Distribution – 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 needs meeting the required low and moderate income eligibility and target low and moderate income areas for public facility improvements and public services.

The COVID-19 fund allocation of $374,812 will provide for public services that include operations for Limited Clientel for seniors and homeless, as well as public services programs for low to moderate income families. The Township will budget $74,862 of these funds for general administration.

Geographic Distribution

<table>
<thead>
<tr>
<th>Target Area</th>
<th>Percentage of Funds</th>
</tr>
</thead>
</table>

Table 8 - Geographic Distribution

Rationale for the priorities for allocating investments geographically

Bristol Township has allocated its CDBG funds for FY 2019 based on activities that will principally benefit low and moderate-income persons, namely seniors. The Community Development activities have a low and moderate-income service area benefit or clientele. The Housing activities that have an income eligibility requirement and will be awarded to qualifying low and moderate-income households throughout the Township.

Discussion

Under the Program Year 2019 CDBG Program, Bristol Township will receive a grant in the amount of $602,959 and anticipates no program income for the year. The Township will budget $120,591 for general administration. The balance of funds will be allocated to
activities which principally benefit low and moderate-income persons in the amount of $482,369.

The COVID-19 fund allocation of $374,812 will provide for public services that include operations for Limited Clientel for seniors and homeless, as well as public services programs for low to moderate income families. The Township will budget $74,862 of these funds for general administration.
Affordable Housing

AP-55 Affordable Housing – 91.220(g)

Introduction

Bristol Township recently joined the Bucks County HOME Consortium and will be able to refer projects that include affordable housing for funding. In addition, utilizing CDBG funding, each year the Township estimates serving about thirteen (13) low-income owner-occupied households through its emergency home repair program.

<table>
<thead>
<tr>
<th>One Year Goals for the Number of Households to be Supported</th>
</tr>
</thead>
<tbody>
<tr>
<td>Homeless</td>
</tr>
<tr>
<td>Non-Homeless</td>
</tr>
<tr>
<td>Special-Needs</td>
</tr>
<tr>
<td>Total</td>
</tr>
</tbody>
</table>

Table 9 - One Year Goals for Affordable Housing by Support Requirement

<table>
<thead>
<tr>
<th>One Year Goals for the Number of Households Supported Through</th>
</tr>
</thead>
<tbody>
<tr>
<td>Rental Assistance</td>
</tr>
<tr>
<td>The Production of New Units</td>
</tr>
<tr>
<td>Rehab of Existing Units</td>
</tr>
<tr>
<td>Acquisition of Existing Units</td>
</tr>
<tr>
<td>Total</td>
</tr>
</tbody>
</table>

Table 10 - One Year Goals for Affordable Housing by Support Type

Discussion

The Township has allocated $100,000 in FY 2019 CDBG funds for the rehabilitation of affordable housing. This allocation is for emergency repairs such as sewer line repairs, roofing, heater repairs, on owner occupied homes for eligible low to moderate income families. If possible, we will also work with local home construction providers for affordable housing.
AP-60 Public Housing – 91.220(h)

Introduction

The previously recognized Weed and Seed Steering Committee has evolved into “Freedom Neighborhood One,” a nonprofit organization charged with continuing the good works of the Weed and Seed program and adding more programs as funds are available to reach adults and children in need or at risk.

Freedom Neighborhood One primarily works within the Venice-Ashby neighborhoods comprised of the Township’s largest concentration of public housing. This organization is administered by the Bucks County Housing Authority which also supports two community police officers to patrol public housing facilities under its Capital Grant. The Housing Authority actively enforces the “One Strike and You Are Out” initiative.

Actions planned during the next year to address the needs to public housing

The Township, in partnership with the Police Department and the Bucks County Public Housing Authority, will provide additional funding for installation of security cameras in the proposed park improvements. Similar efforts in this community have resulted in a significant reduction in crime.

Additionally, the Bucks County Housing Authority will continue to pursue additional sources of funding and partner with public and private organizations to improve services and address the needs of public housing residents.

Actions to encourage public housing residents to become more involved in management and participate in homeownership

In accordance with the BCHA Designated Housing Plan, the PHA works to improve the living environment of low- and moderate-income families through the designation of certain buildings for particular resident groups (ie. elderly, disabled, families). Additionally, the BCHA gathers resident input into the development of the BCHA Annual Plan through coordination with established Resident Councils and conducting resident surveys. The BCHA’s Board of Directors also includes a Public Housing Resident.

The BCHA works with the public and non-profit service agencies to ensure necessary services are available on-site for public housing residents.

If the PHA is designated as troubled, describe the manner in which financial assistance will be
provided or other assistance

The PHA is not designated as troubled.

Discussion

Bristol Township has identified the need for decent, safe, sanitary housing. The largest income group affected by housing problems is the extremely low-income households. The Bucks County Housing Authority is an important part of Bristol Township’s housing strategy. BCHA is the primary assisted housing provider of housing for extremely low income, very low income and lower income residents of Bucks County and Bristol Township.
AP-65 Homeless and Other Special Needs Activities – 91.220(i)

Introduction

The Township has worked and is continuing to work with agencies providing assistance to housing, social service agencies, and other entities, including those focusing on services to children, elderly persons, persons with disabilities, persons with HIV/AIDS and their families, and homeless persons.

The Township, through its Office of Community Development, is a member of the Bucks County Continuum of Care spearheaded by the Bucks County Community Development and Housing Department.

As a member of the Bucks County Continuum of Care and the Human Services Housing Coalition, Bristol Township is aware of the many opportunities available to the Homeless. The homeless in Bristol Township are eligible to participate in the many programs and opportunities offered by the Continuum. Bristol Township makes timely referrals for those in need to both the shelter and the Bucks County Housing Authority.

Funds from the Bristol Township CDBG Program have provided financial support to the one shelter for the homeless operated by the Bucks County Emergency Homeless Shelter. It is located in Bristol Township. The Township refers homeless persons to the shelter. In addition, the Township works with the Bucks County Opportunity Council. The BCOC opened its Opportunity Center in Bristol Township in the Fall of 2018.

Describe the jurisdictions one-year goals and actions for reducing and ending homelessness including

Reaching out to homeless persons (especially unsheltered persons) and assessing their individual needs

The Township in partnership with the Bucks County CoC works on reaching out to homeless persons and assessing their individual needs. The CoC regularly analyzes the Annual Performance Reports for programs serving the homeless to assess performance and improve access to mainstream programs. Additionally, the CoC coordinates with publicly-funded systems of care through Discharge Policies to ensure individuals are not released into homelessness. These systems include: Health, Mental Health, Children and Youth, and Corrections.

Homeless households are assessed upon entry into the homeless system to identify mainstream...
resources for which they are eligible. Support services in the form of case management is provided to individuals to apply for and obtain a variety of mainstream benefits.

Addressing the emergency shelter and transitional housing needs of homeless persons

The Bucks County Housing Link is used for assessing the needs of the homeless and those unsustainably housed in the County and the Township. Currently, Housing Link is the centralized point of information, assessment, and referral services for all Bucks County residents experiencing a housing-related crisis. Case managers across the County are able to use the Housing Link to provide the best assessment and housing assistance possible. Bucks County currently has 171 total homeless beds - including 77 seasonal beds. Seasonal beds are available on nights that are declared a Code Blue (overnight temperature below 30 degrees).

We closely monitor transitional housing as these units make up most of housing beds available for the homeless. Housing is considered transitional when short-term rental assistance and support services are provided for up to 24 months. There is a total of 351 transitional housing units serving primarily families with children (85% of all TH).

There are a total of 159 Permanent Housing Units in Bucks County. Of these, 74 are Rapid Re-Housing Units, and 85 are Permanent Supportive Housing.

In addition to the facilities and housing described above, a variety of services exist to meet the needs of homeless individuals and families in Bucks County. BCHA will work continually to address the housing needs of the homeless in Bucks County and Bristol Township.

Helping homeless persons (especially chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth) make the transition to permanent housing and independent living, including shortening the period of time that individuals and families experience homelessness, facilitating access for homeless individuals and families to affordable housing units, and preventing individuals and families who were recently homeless from becoming homeless again

The CoC will continue to regularly analyzes the Annual Performance Reports for programs serving the homeless to assess performance and improve access to mainstream programs. Additionally, the CoC coordinates with publicly-funded systems of care through Discharge Policies to ensure individuals are not released into homelessness. These systems include: Health, Mental Health, Children and Youth, and
Corrections.

Homeless households are assessed upon entry into the homeless system to identify mainstream resources for which they are eligible. Support services in the form of case management is provided to individuals to apply for and obtain a variety of mainstream benefits. Furthermore, mainstream services are connected to these individuals or families to help compliment the services offered throughout the CoC.

Helping low-income individuals and families avoid becoming homeless, especially extremely low-income individuals and families and those who are: being discharged from publicly funded institutions and systems of care (such as health care facilities, mental health facilities, foster care and other youth facilities, and corrections programs and institutions); or, receiving assistance from public or private agencies that address housing, health, social services, employment, education, or youth needs.

Bristol Township, in partnership with the CoC, has taken steps in assisting these individuals in need of help to avoid homelessness. Persons identified to be at increased risk include: persons who are extremely low income, persons with disabilities, persons fleeing domestic violence, homeless persons being discharged from crisis units, hospitals and jails, unaccompanied youth and youth aging out of foster care. Prevention assistance is also primarily provided to persons who have already received notice that eviction proceedings have been started in court, since they are the households most likely to be evicted without assistance.

Bristol Township and community partners will provide services to identified persons and address their needs to avoid becoming homeless or returning to homelessness.

Discussion

Bristol Township will continue to work with the Bucks County CoC to address the needs of the homeless population in the Township.

In response to the COVID-19 crisis, the township will provide funding to the shelter for needed operational costs. As well, the Township will provide 3 month maximum emergency rental and mortgage assistance to low- and moderate-income households to prevent eviction due to loss of
income.
AP-75 Barriers to affordable housing – 91.220(j)

Introduction:

Bristol Township will continue to monitor and review public policies for discriminatory practices and or impacts on housing availability.

The Township is committed to removing or reducing barriers to the development of affordable housing whenever 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

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 – 91.220(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

Assistance to an Aging Population:

- Housing rehabilitation
- Provide for the Senior Center and its programs, especially as related to the COVID-19 pandemic
- 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.

Actions planned to foster and maintain affordable housing

Due to a lack of available resources, the Township is not able to fund residential new construction. Our inclusion in the Bucks County HOME Consortium however not only increases the funding available to Bucks County, but also allows Bristol Township to encourage the development of affordable housing with that source of gap financing. The current Action Plan will provide 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 a policy of the Department to avoid disturbing paint. If lead based paint is detected and when feasible, efforts will be made to encapsulate the hazardous materials. Any home that is suspected of having lead-based paint will be referred to the Bucks County Lead-Based Paint Hazard Reduction Program. However, all homeowners with young children 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 Bucks County.

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.
- **TCDI Report**: The Bucks County Planning Commission, with a grant from the Delaware Valley Planning Commission, recently completed and Transportation and Community Development Initiative 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. In addition, several areas of the Township, including the nearly 100 acre property owned by the Coca Cola Company once vacant but has recently been the site of development and employment. Also in the process of development in the Keystone Industrial Park is the Action Manufacturing Company maintaining 175 jobs that would have been lost to Pennsylvania.
- **LERTA**: Bristol Township has partnered with Bucks County and the Bristol Township School District in identifying the use of the Keystone Industrial Park as an Enterprise Zone.
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.). These taxing bodies have successfully worked together to assign LERTA status to 631 commercial and industrial parcels.

**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 FY 2015-2019 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.

**Non-Profit 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 department 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 department 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 appropriate action when performance problems arise. The Office of Community Development 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 – 91.220(l)(1,2,4)

Introduction:

Bristol Township will receive an annual allocation of CDBG funds in the amount of $602,959 for FY 2019, and an additional $374,312 in CARES Act funding. Since the Township receives a CDBG allocation, the questions below have been completed as applicable.

Under the FY 2019 CDBG Program, Bristol Township will receive a grant in the amount of $602,959 plus $374, 312 in CARES Act funding and anticipates no program income for the year. The Township will budget $120,591 and $74, 862 respectively for general administration. The balance of funds of $482,369 and $299,450 respectively will be allocated to activities which principally benefit low and moderate-income persons.

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

Total Program Income: 0

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%
Attachments
Citizen Participation Comments

SAMPLE—COVID-19 Waiver Notification

Please submit request notifications to COVID-19WaiverPHI@hud.gov and copy your CPD HUD Representative.

<table>
<thead>
<tr>
<th>COVID-19 Waiver - Required Information</th>
</tr>
</thead>
<tbody>
<tr>
<td>Grantee: Bristol Township, PA</td>
</tr>
<tr>
<td>Date Waiver Notification Submitted:</td>
</tr>
<tr>
<td>Requestor's Name: Randee Elton</td>
</tr>
<tr>
<td>Requestor's Title: Township Manager</td>
</tr>
<tr>
<td>Requestor's Phone Number: 267-812-2914</td>
</tr>
<tr>
<td>Requestor's email: <a href="mailto:rollen@bristoltownship.org">rollen@bristoltownship.org</a></td>
</tr>
<tr>
<td>Declared Disaster Area(s) where waiver will be used: Bristol Township, Bucks County, PA</td>
</tr>
<tr>
<td>Date on which the grantee anticipates first use of the waiver flexibility (2 days after date of notification): May 11, 2020</td>
</tr>
</tbody>
</table>

Check the Waivers below that your organization/grant program(s) will be implementing.

<table>
<thead>
<tr>
<th>Item No.</th>
<th>Program</th>
<th>Item to be Waived (per Mega Waiver, effective March 31, 2020)</th>
<th>Check if yes</th>
</tr>
</thead>
<tbody>
<tr>
<td>8</td>
<td>Con Plan</td>
<td>HOME, CDBG, HTF, ESG, and HOPWA Programs—Citizen Participation Public Comment Period for Consolidated Plan Amendment</td>
<td>X</td>
</tr>
<tr>
<td>9</td>
<td>Con Plan</td>
<td>HOME, CDBG, HTF, ESG, and HOPWA Programs—Citizen Participation Reasonable Notice and Opportunity to Comment</td>
<td>X</td>
</tr>
<tr>
<td>10</td>
<td>ESG</td>
<td>HMIS Lead Activities</td>
<td></td>
</tr>
<tr>
<td>11</td>
<td>ESG</td>
<td>Re-evaluations for Homelessness Prevention Assistance</td>
<td></td>
</tr>
<tr>
<td>12</td>
<td>ESG</td>
<td>Housing Stability Case Management</td>
<td></td>
</tr>
<tr>
<td>13</td>
<td>ESG</td>
<td>Restriction of Rental Assistance to Units with Rent at or Below FMR</td>
<td></td>
</tr>
<tr>
<td>14</td>
<td>HOPWA Program</td>
<td>Self-Certification of Income and Credible Information on HIV Status</td>
<td></td>
</tr>
<tr>
<td>15</td>
<td>HOPWA Program</td>
<td>FMR Rent Standard</td>
<td></td>
</tr>
<tr>
<td>16</td>
<td>HOPWA Program</td>
<td>Property Standards for TBRA</td>
<td></td>
</tr>
<tr>
<td>17</td>
<td>HOPWA Program</td>
<td>Space and Security</td>
<td></td>
</tr>
</tbody>
</table>
Heather Mahaley

From: Heather Mahaley
Sent: Wednesday, May 06, 2020 1:41 PM
To: CPD_COVID-19WaiverPHI@hud.gov
Subject: Waiver COVID-19 fund waiver

From: Heather Mahaley
Sent: Wednesday, May 06, 2020 1:39 PM
To: COVID-19WaiverPHI@hud.gov
Cc: Doyle, Damian J <Damian.Doyle@hud.gov>; Randee J. Elton <relton@bristoltownship.onmicrosoft.com>
Subject: Covid-19 fund waiver

Good afternoon,

Attached please find a waiver request for Bristol Township, PA. Should you have any questions or need additional information, please do not hesitate to contact me or Randee Elton.

Thank you,
Heather Mahaley

Heather Mahaley, AICP
Community Development
Bristol Township
2017 812 3102

Annual Action Plan
2019
NOTICE

Bristol Township Community Development Block Grant Program Public Hearing for FY2019 Annual Action Plan Amendment

Bristol Township is an entitlement community eligible to receive assistance under the U.S. Department of Housing and Urban Development (HUD) through the Community Development Block Grant (CDBG) Program. In accordance with the federal regulations, 24 CFR, Part 91, and in conjunction with the CARES Act funding, Bristol Township has prepared a draft amendment to the 2019 Annual Action Plan for its Community Development Program. The proposed FY2019 Annual Action Plan amendment is a component of the 2015-2019 Consolidated Plan that identifies resources and strategies to assist in meeting the housing and community development needs and includes plans for monitoring performance. Bristol Township received $609,399.00 in CDBG funds for FY2019 and will receive an additional $374,312 from the CARES Act funding to mitigate the effects of the COVID-19 pandemic. CDBG funds will be used for public facilities improvements and owner-occupied emergency repairs, as well as operating costs at the Bristol Township Senior Center and the Bucks County Emergency Shelter, a rental payment assistance program and food delivery. Changes to the Citizen Participation Plan to enable a condensed public participation process in the event of a declared disaster will also be reviewed.

There will be a Zoom public hearing on May 13, 2020 at 10:00 am; all details are listed below. The meeting is open to the public.

The required 5-day commenting period regarding the Annual Action Plan amendments begins on May 11, 2020. All comments must be in writing and sent to the Community Development Department by email at hmsheley@bristoltownship.org or dropped off at the municipal building drop box at 2501 Bath Road, Bristol, PA.

Topic: Bristol Community Development Public Meeting
Time: May 13, 2020 10:00 AM Eastern Time (US and Canada)

Join Zoom Meeting
https://us02web.zoom.us/j/86269506417

Meeting ID: 862 6950 6417

One tap mobile
+13017158592,86269506417# US (Germantown)
+13126266799,86269506417# US (Chicago)

Dial by your location
+1 301 715 8592 US (Germantown)
+1 312 626 6799 US (Chicago)
+1 646 558 8556 US (New York)
+1 253 215 8782 US (Tacoma)
+1 346 248 7799 US (Houston)
+1 669 900 9128 US (San Jose)

Meeting ID: 862 6950 6417
Find your local number: https://us02web.zoom.us/u/kcNebqWV9R
Citizen Participation Plan

Each year, Bristol Township receives funding through the Department of Housing and Urban Development’s (HUD) Community Development Block Grant (CDBG) program. As a requirement for receiving these funds, the Bristol Township Community Development Office (BTCDO) must complete several planning and reporting documents which must be submitted to HUD for approval. These reports include:

- Five Year Consolidated Plan (ConPlan)
- Assessment of Fair Housing (AFH)
- Annual Action Plan (AAP)
- Consolidated Annual Performance Evaluation Report (CAPER)
- Citizen Participation Plan
- Substantial Amendment to any of the above plans or reports (as defined below)

Citizen Participation must be an integral part of the planning process for the Consolidated Submission for all Community Planning and Development Programs (CPD). Much of the citizen participation process involves scheduling, publicizing and conducting public meetings and hearings. HUD, in its attempt to ensure adequate opportunity for participation by program beneficiaries, has prescribed minimum Citizen Participation, plan submission, performance reporting, and record maintenance requirements. These Citizen Participation Requirements are spelled out under 24 Code of Federal Regulations (CFR) 570.431(a) as well as 24 CFR Part 91.105.

The local citizen participation process generally includes a yearly series of well-advertised community/neighborhood public meetings held at the Bristol Township Municipal Building to review the Annual Action Plan and the Consolidated Annual Performance Evaluation Report as well any amendments or changes to these plans and/or the Assessment of Fair Housing (AFH). All meetings/hearings are advertised in accordance with applicable HUD, State and local regulations.

The Bristol Township Citizen Participation Plan has been structured to provide and encourage participation of Bristol Township citizens in the consolidated planning process. Its purpose is to
encourage all citizens including:

- Minorities and non-English speaking persons;
- Persons with mobility, visual or hearing impairments;
- Citizens who are of low and moderate income;
- Residents of areas affected by slums and blight in which CDBG funds are proposed to be used;
- Residents of low and moderate-income neighborhoods/areas as determined by the Township utilizing data provided by the Department of Housing and Urban Development with respect to Census data or more current data, when provided by the Department;
- Residents of assisted housing developments in conjunction with consultation with public housing authorities;
- Persons representing businesses, developers, community and faith-based organizations to participate in this planning process.

Public Notice

To encourage low and moderate-income persons to attend and participate, the annual community meetings/hearings are held in the early evening, Monday through Thursday at the Bristol Township Municipal Building. The BTCDO tries to avoid scheduling meetings on nights common with other major events which may require the participation of affected area residents and community leaders. When required, public hearings are conducted by the Township Council and are held at Township Council Chambers, 2501 Bath Road, Bristol, Pennsylvania 19007.

All public meetings/hearings shall be announced at least ten (10) calendar days before the date of the meeting. The BTCDO will utilize the following media to notify program beneficiaries regarding upcoming meetings.

A. Newspaper advertisements, of no smaller than eight (8) point size, are published in adjudicated newspapers serving the Township (Bucks County Courier Times). Each publication is published at least ten (10) calendar days before the date of the meeting and/or publication of plans and reports.

B. All public notices except those dealing with the environment are typically published in a newspaper of general circulation to specifically targeted residents of Township program areas.
C. During a declared disaster, the requirement to publish the notice and summary in a newspaper of general circulation described above may be suspended. The Township shall at a minimum publish public notices on the Township’s website and promote such advertisements and on social media as available. Furthermore, a shorter time period for notification may be allowable by HUD waivers. The timelines adopted will be those established by HUD at the time.

Public Meetings & Hearings

At least two public meetings/hearings must be held each year. One of which must be held as part of the Annual Action Plan and the Consolidated Plan & AFH (conducted once every five years) development process and a second public meeting must be held to provide information related to the CAPER which details the Township’s performance towards meeting annual goals and objectives for the CDBG Program. Additional public meetings may be held at the discretion of Township staff.

During a declared disaster, public meetings and hearings may be held in an online capacity as allowed by HUD. In this situation, the ability for public comment must be provided.

The meetings/hearings will serve several purposes:

- Inform potential recipients of the functions of the BTCDO and its relationship to both Bristol Township Council and HUD;
- Explain the rules and regulations governing the CDBG program;
- Explain how the program relates to the needs of individuals/neighborhoods/non-profit organizations, etc.;
- Provide information regarding the amount of CDBG funds expected to become available;
- Explain the types of eligible activities;
- Discuss the status of previously funded activities;
- Determine citizen's perceived housing and non-housing community development needs and possible activities to address those needs;
- Review of performance and compliance issues;
- Receive comments, input and feedback related to each plan and/or report.

Publication of Plans & Reports

The BTCDO will publish, and make available to the public, the following plans and reports:
The publication is made to afford citizens an opportunity to examine the documents’ contents, and to provide further opportunity for comments and citizen feedback regarding the proposed document.

A brief notice and summary of each plan and/or report is to be published in a newspaper of general circulation (Bucks County Courier Times). The publication will be printed a minimum of thirty (30) calendar days prior to it being considered for approval by the Township Council. The announcement shall also include instructions as to where citizens may find a full copy of the proposed plan and/or report for further review.

During a declared disaster, the requirement to publish the notice and summary in a newspaper of general circulation described above may be suspended. The Township shall at a minimum publish public notices on the Township’s website and promote such advertisements on social media as available. Furthermore, a shorter time period for notification may be allowable by HUD waivers. The timelines adopted will be those established by HUD at the time.

Additionally, all plans and reports, listed above, shall be made available, in their entirety, for further review in the following manner: 1) a PDF copy available on Bristol Township’s website and 2) hard copies shall be available for review at the Township Municipal Building. Furthermore, one (1) copy of the proposed plan and/or report will be made available, free of charge, for individuals who request them.

A period of no less than thirty (30) days shall be made available for public review and comment for the Consolidated Plan, Annual Action Plan, Citizen Participation Plan, the Assessment of Fair Housing, and any Substantial Amendments to these Plans. The Township shall make the Consolidated Annual Performance and Evaluation Report available for public comment for a minimum of fifteen (15) calendar days prior to finalization by Township staff.
During declared emergency situations, such as pandemics or natural disasters, the public comment period may be shortened, as described by HUD, to as little as five (5) days to accelerate the process. In these cases, public documents will be made available on the Township’s website only.

Amendments to Plans & Reports

In the event the Township needs to make changes to the Consolidated Plan and/or Annual Action Plan, the Township must determine the nature of the required changes and in such cases where the changes are considered substantial, the Township must produce what HUD refers to as a Substantial Amendment to the Consolidated Plan and/or Annual Action Plan.

The Substantial Amendment process will occur when the following program changes exist:

To the Consolidated Plan:

- There is a change to the Priority Needs identified in the Strategic Plan;
- There is a change to the Goals and Objectives identified in the Strategic Plan;
- There is a change to the Target Geographies/Areas identified in the Strategic Plan;
- New entitlement grants are awarded to the Township.

To the Annual Action Plan:

- There is a change to the Annual Goals and Objectives identified in the Action Plan;
- There is a change to the Target Geographies/Areas identified in the Action Plan;
- When an Project previously described in the Action Plan is canceled;
- Creation of a new Project not previously described in the Action Plan;
- The funding allocated to an existing Project is adjusted by 20%, or more, of the initial funding
amount;
• Revision to an existing project which changes the purpose, scope, location, or beneficiaries of the program.

To the Assessment of Fair Housing:

• A material change in circumstances within the jurisdiction that affects the information on which the AFH is based, to the extent that the analysis, the fair housing contributing factors, no longer reflect actual circumstances;
• There is a change to the Priorities and Goals identified in the Assessment

All other changes will be considered revisions (non-substantial) and will be accomplished administratively by the BTCDO.

Prior to amending a Consolidated Plan and/or Annual Action Plan, Township will provide citizens with reasonable notice of, and opportunity to comment on, proposed program changes in its use of Action Plan funds for a project (either funded in whole or in part). This involves a 30-day review period. A summary of citizen comments or views and the reasons any such comments or views were not accepted will be attached to amendments of the Plan. The Township will consider any such comments, and if the grantee deems appropriate, modify the changes.

Citizen Comments & Feedback

During all public meetings and hearings citizens are encouraged to comment or submit written comments and feedback to the BTCDO concerning the proposed plans, reports and the performance of the BTCDO and/or other Township departments and entities under contract with the Township for the implementation of program related activities. All comments, written and oral, will be accepted and included as part of the citizen participation records for the associated plan and/or report.

Citizens may also provide written comments and feedback via mail addressed to the following:

Bristol Township, Community Development Department, 2501 Bath Road, Bristol, PA 19007.

Comments outside of the public hearing process must be submitted in writing to the Township either by email or mail.
When responses are warranted, written comments/complaints regarding any facet of the CDBG Program or its implementation in Bristol Township are answered in writing. Unless specific circumstances exist, which prevent immediate action, written replies are mailed within fifteen (15) working days, where practical, after receipt of the written comment/complaint (or oral comment/complaint if made during a public meeting/hearing).

Accessibility of Meetings & Documents

Bilingual Information

With at least one business day of advanced notice Spanish translators will be provided at public meetings. Public notices will be published in Spanish in a Spanish Language newspaper. Translation services will also be provided for persons who may need assistance reviewing printed documents, reports and/or other related materials. Citizens may contact the Township Offices at (215) 785-0500 at least 24 hours in advance to request such services.

Hearing Impaired

Persons with hearing impairments may utilize the hearing-impaired phone assistance by contacting TDD 215–785-4224.

American With Disabilities Act (ADA) - 1973 Rehabilitation Act

With at least one business day of advanced notice, the department shall provide assistance and special arrangements for those who are disabled in order to provide information and services concerning federally funded programs. Proposed CDBG plans are placed on the Township’s website. All visual aids used in the Township council chambers are projected on to two large screens to help all sighted people to see them better. All public meetings are held in buildings which are accessible to the handicapped. Citizens may contact the Township Office at (215) 785-0500 at least 24 hours in advance to request assistance services.

Additional Citizen Participation Activities
Consultation of Area Agencies

Under 24 CFR.91.100 (a)(1) as part of the Consolidated Plan and Assessment of Fair Housing development processes, the BTCDO shall consult with other public and private agencies that provide assisted housing, health services, and social services, including those focusing on services to children, elderly persons, persons with disabilities, persons with HIV/AIDS and their families, and homeless persons. The BTCDO shall also consult with community-based and regionally-based organizations that represent protected class members and organizations that enforce fair housing laws when preparing both the Consolidated Plan and the AFH including participants in the Fair Housing Assistance Program, Fair Housing organizations, nonprofit organizations that receive funding under the Fair Housing Initiative Program and other public and private fair housing service agencies, to the extent that such entities operate within the jurisdiction. Additionally, the consultation process will include consultation with regional government agencies in addition to adjacent units of general local government and local government agencies. This includes local government agencies with metropolitan-wide planning and transportation responsibilities, partially for problems and solutions that go beyond the BTCDO jurisdiction.

Under 24 CFR.91.100 (c)(1) as part of the Consolidated Plan and Assessment of Fair Housing development processes, the BTCDO shall also consult with public housing authorities (PHAs) operating within the jurisdiction. This consultation will continue to consider public housing needs, planned programs and activities under the Consolidated Plan as well as strategies for affirmatively furthering fair housing specifically to address any fair housing issues in the public housing and Housing Choice Voucher programs. The consultation process requires the BTCDO to address the needs of public housing and, where necessary, the manner in which it will provide financial or other assistance to a troubled PHA to improve the PHA’s operations and remove the designation of troubled.

Public Access to Records

The BTCDO maintains copies of all plans, reports and amendments for each program year. Additionally, the BTCDO maintains a library of rules, regulations, and records required by HUD and the Township. This library of records includes records related not only to the plans and reports but also all programmatic documents, meeting notes, written comments received, environmental reviews, office publications, etc. This information is available for public review.
and copying during normal business hours, provided that the requested document is public information pursuant to applicable federal, state, and local laws. During normal working hours (8:30 a.m. to 5:00 p.m.), the BTCDO shall make available for citizen review upon request the following documents:

- All program information materials
- Copies of regulations and information about the Consolidated Plan and/or other programs administered by the Department of Housing and Urban Development and covered by the Consolidated Plan
- Environmental review materials
- Citizen Participation Plan
- Prior applications, performance reports, and other public reports
- CDBG Project applications from project sponsors
- Written comments and/or complaints and the Township's response as appropriate
- Fair Housing Assessment
- Procurement procedures (contracting)
- Rehabilitation Program Guidelines

**Public Access to Data Sources**

As part of the Consolidated Plan and the Assessment of Fair Housing, the BTCDO will utilize HUD provided data sets and mapping tools. When applicable, the BTCDO will reference these data sets in plans and reports as well as provide a link to such data sources within the draft documents. This shall provide citizens and community stakeholders the opportunity to review the data utilized to set priority needs, goals and objectives.

**Residents of Public and Assisted Housing**

Residents of public and assisted housing are stakeholders with HUD in that they receive rental assistance from HUD. These residents are therefore encouraged to participate in the planning and execution of the CDBG Program, because they are also eligible to benefit from the expenditure of CDBG funds.
Environmental Review

In certain instances, the participation consists of publication of specific actions/findings, including a description of the project, its locations, submission of relevant data to applicable local, state and federal agencies for review and comment, and the Community Development Administrator’s approval of federal environmental findings relating to the Request for Release of funds from HUD.

Miscellaneous and Informal Meetings

The BTCDO staff attends and/or conducts miscellaneous meetings and hearings throughout the program year. While many of these meetings are project specific, many others are held at the request of individuals, groups, other Township departments or Township Council members for the purpose of disseminating or receiving information about the CDBG Program in general, or about issues of specific interest. These meetings generally are not advertised, since the meeting is attended by the parties requesting the meeting, BTCDO staff and various other invited participants.

The BTCDO maintains an Initial Contact/Proposed Project file and Citizen Comment/Complaint file. These mechanisms allow the BTCDO to record correspondence with individuals and/or organizations that submit proposals or make comments or requests of the BTCDO during the program year. Requests, proposals and questions received during the program year are researched and discussed during applicable local public meetings and during the planning of subsequent programs. This information is on file in the BTCDO and is processed at a time appropriate to the nature of the specific contact.

Technical Assistance

Pursuant to the Housing and Community Development Act of 1974 (as amended) and its implementing federal regulations, the BTCDO shall provide technical assistance when requested by public and private agencies, non-profit public benefit organizations and individuals for the purpose of assisting the agency or individual in developing its proposal for consideration of Consolidated Plan funding, provided the proposal is eligible and qualifies per HUD regulations.
Technical assistance shall include but not be limited to:

- Assisting in better defining the proposal by outlining specific information the applicant(s) should gather and include in their proposal;
- Referring applicant to other public and private agencies which may help gather or provide needed information and/or technical assistance;
- Developing preliminary cost estimates for the proposal;
- Preparing very basic conceptual descriptions and/or drawing of the proposal;
- Providing for final review of the proposal for completeness prior to its official submission to the BTCDO for consideration for funding.

In addition to the technical assistance for development of proposals, the BTCDO will continue providing assistance for implementation; administration and monitoring of CDBG funded projects. This assistance includes such things as:

- Obtaining environmental clearance for projects;
- In certain instances (depending on staff workload), implementing activities on behalf of the subrecipient;
- Providing guidance in the solicitation and contracting process for hiring a consultant to ensure compliance with applicable local, state and federal regulations;
- Assisting in reviewing and monitoring consultant’s work;
- Providing guidance in bid advertisement for construction to ensure compliance with all applicable requirements;
- Assisting in monitoring contractors and subcontractors during and after construction for compliance with HUD regulations;
- Acting as mediator in disputes between subrecipient and contractor;
- Providing CDBG application workshops for nonprofit organizations.

**Plans to Minimize Displacement of Persons and to Assist any Persons Displaced**

The Township, in accordance with the Uniform Relocation Assistance and real Property Acquisition Policies Act of 1970, the 1988 Common Rule, and the 1989 Barney Frank Act, will provide relocation assistance, as described in 24 CFR 570.606(b)(2), to each low/moderate-income household displaced by the demolition of housing or by the conversion of a low/moderate-income dwelling to another use as a direct result of assisted activities.
Consistent with the goals and objectives of activities assisted under the Act, the BTCDO will include, but not be limited to, the following steps to minimize the displacement of persons from their homes:

1. Avoid, as much as possible, Action Plan funded projects which permanently displace persons from their homes.

2. Fully advise any residents who may be displaced of their rights and options for relocation benefits as required by federal regulations.

3. Assist displaced residents in filling out any required forms for assistance or to appeal Township decisions regarding displacement or the level of relocation benefits.

Complaints

Citizens wishing to submit a complaint regarding any portion of the citizen participation process and/or development of the CDBG application, Consolidated Plan, Annual Action Plan, CAPER or any Substantial Amendment to these plans, may do so according to the following procedure:

1. Formal complaints should be submitted in writing to:

   Bristol Township
   Community Development Department
   Attn: Director
   2501 Bath Road
   Bristol, Pennsylvania 19007

   The Community Development Administrator will refer the complaint to the appropriate Township staff member for written response regarding the complaint. The written response will be mailed within fifteen (15) business days of the receipt of the complaint.
2. If the complainant is not satisfied with the Community Development Administrator’s response, the complainant can appeal the decision to the Township Manager. The Township Manager will have thirty business (30) days to take further action as deemed necessary to address the complainant’s concerns.

3. If the complainant is not satisfied with the response of the Township Manager a formal complaint may be addressed to the Township Manager and the Township Council.

4. If complainants are not satisfied with the decision of the Township Council, a written complaint may be submitted to the HUD Regional Office at:

Philadelphia Regional Office
The Wanamaker Building
100 Penn Square East
Philadelphia, PA 19107-3380
Grantee SF-424's and Certification(s)

### Application for Federal Assistance SF-424

<table>
<thead>
<tr>
<th>Field</th>
<th>Value</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>1.</strong> Type of Document</td>
<td>[ ] Preapplication</td>
</tr>
<tr>
<td></td>
<td>[x] Application</td>
</tr>
<tr>
<td></td>
<td>[ ] Amended Application</td>
</tr>
<tr>
<td></td>
<td>[ ] Correction</td>
</tr>
<tr>
<td></td>
<td>[ ] Revision, select one only below</td>
</tr>
<tr>
<td><strong>2.</strong> Type of Application</td>
<td>[ ] Inc.</td>
</tr>
<tr>
<td></td>
<td>[ ] Rev.</td>
</tr>
<tr>
<td></td>
<td>[ ] Add.</td>
</tr>
<tr>
<td></td>
<td>[x] Rev.</td>
</tr>
<tr>
<td></td>
<td>[ ] Other (Specify)</td>
</tr>
<tr>
<td><strong>3.</strong> Date Received</td>
<td></td>
</tr>
<tr>
<td><strong>4.</strong> Assistant Identifier</td>
<td></td>
</tr>
<tr>
<td>[x] Federal Entity Identifier</td>
<td></td>
</tr>
<tr>
<td>[ ] Federal Award Identifier</td>
<td></td>
</tr>
<tr>
<td>State Use Only:</td>
<td></td>
</tr>
<tr>
<td><strong>5.</strong> Date Received by State</td>
<td></td>
</tr>
<tr>
<td><strong>6.</strong> State Application Identifier</td>
<td></td>
</tr>
</tbody>
</table>

### APPLICANT INFORMATION:

<table>
<thead>
<tr>
<th>Field</th>
<th>Value</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>a.</strong> Legal Name</td>
<td></td>
</tr>
<tr>
<td><strong>b.</strong> Employer/Taxpayer Identification Number (EIN/TIN):</td>
<td></td>
</tr>
<tr>
<td><strong>c.</strong> Organization DUNS:</td>
<td></td>
</tr>
<tr>
<td><strong>d.</strong> Address:</td>
<td></td>
</tr>
<tr>
<td><strong>e.</strong> Organizational Unit:</td>
<td></td>
</tr>
<tr>
<td>Department Name:</td>
<td></td>
</tr>
<tr>
<td>User Name:</td>
<td></td>
</tr>
<tr>
<td>Community Development</td>
<td></td>
</tr>
<tr>
<td><strong>f.</strong> Name and contact information of person to be contacted on matters involving this application:</td>
<td></td>
</tr>
<tr>
<td><strong>Prefix:</strong></td>
<td></td>
</tr>
<tr>
<td><strong>First Name:</strong></td>
<td></td>
</tr>
<tr>
<td><strong>Last Name:</strong></td>
<td></td>
</tr>
<tr>
<td><strong>Middle Name:</strong></td>
<td></td>
</tr>
<tr>
<td><strong>Email:</strong></td>
<td></td>
</tr>
<tr>
<td><strong>Title:</strong></td>
<td></td>
</tr>
<tr>
<td><strong>Organization:</strong></td>
<td></td>
</tr>
<tr>
<td><strong>Telephone Number:</strong></td>
<td></td>
</tr>
<tr>
<td><strong>Fax Number:</strong></td>
<td></td>
</tr>
<tr>
<td><strong>Email:</strong></td>
<td></td>
</tr>
</tbody>
</table>

---

**Annual Action Plan**

**2019**

OMB Control No: 2506-0117 (exp. 06/30/2018)
### Application for Federal Assistance SF-424

**9. Type of Applicant 1: Select Applicant Type:**
- [ ] City or County Government
- [ ] Other (Specify):

**10. Name of Federal Agency:**
- U.S. Department of Housing and Urban Development

**11. Catalog of Federal Domestic Assistance Number:**
- 14.515
- G-DA ID:

**12. Funding Opportunity Number:**
- Title:

**13. Competition Identification Number:**
- Title:

**14. Areas Affected by Project (Cities, Counties, States, etc.):**

**15. Descriptive Title of Applicant’s Project:**
- All activities to support, prevent or respond to COVID-19 including administration and public services

[Attach supporting documents as specified in agency instructions.]
Application for Federal Assistance SF-424

18. Estimated Funding ($):

| a. Federal                  | 7,922,208 |
| b. Applicant                |           |
| c. State                    |           |
| d. Local                    |           |
| e. Other                    |           |
| f. Program Income           |           |
| g. TOTAL                    | 7,922,208 |

19. Is Application Subject to Review By State Under Executive Order 12372 Process?
   - [ ] This application was made available to the State under the Executive Order 12372 Process for review on
   - [ ] Program is reviewed by E.O. 12372.

20. Is the Applicant Delinquent On Any Federal Debt? (If "Yes", provide explanation in attachment.)
   - [ ] Yes
   - [x] No

21. By signing this application, I certify (1) the statements contained in the list of certifications** and (2) that the statements hereina are true, complete and accurate to the best of my knowledge. I also provide the required assurances** and agree to comply with any resulting terms if I accept an award. I am aware that any false, fictitious, or fraudulent statements or claims may subject me to criminal, civil, or administrative penalties. (U.S. Code, Title 218, Section 1001)

   ** I AGREE

   ** The list of certifications and assurances, or an internet site where you may obtain this list, is contained in the announcement or agency award/selection notice.

Authorized Representative:

<table>
<thead>
<tr>
<th>First Name</th>
<th>Last Name</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Taxpayer Identification Number: 99-0001234

Authorized Representative Signature: [Signature]

* Date Signed: 06/04/2020
NOTE. Certain of these assurances may not be applicable to your project or program. If you have questions, please contact the Awarding Agency. Further, certain Federal assistance awarding agencies may require applicants to certify to additional assurances. If such is the case, you will be notified.

As the duly authorized representative of the applicant, I certify that the applicant:

1. Has the legal authority to apply for Federal assistance, and the institutional, managerial and financial capability (including funds sufficient to pay the non-Federal share of project costs) to ensure proper planning, management, and completion of the project described in this application.

2. Will give the awarding agency, the Comptroller General of the United States, and, if appropriate, the State the right to examine all records, books, papers, or documents related to the assistance, and will establish a proper accounting system in accordance with generally accepted accounting standards or agency directives.

3. Will not dispose of, modify the use of, or change the terms of the real property title or other interest in the site and facilities without permission and instructions from the awarding agency. Will follow the Federal awarding agency directives and will keep a record of the use of Federal assistance funds to assure non-discrimination during the useful life of the project.

4. Will comply with the requirements of the assistance awarding agency with regard to the drafting, review, and approval of construction plans and specifications.

5. Will provide and maintain competent and adequate engineering supervision at the construction site to ensure that the complete work conforms with the approved plans and specifications and will furnish adequate reports and other information as may be required by the assistance awarding agency or State.

6. Will submit and complete the work within the applicable time frame after receipt of approval of the awarding agency.

7. Will establish safeguards to prohibit employees from using their positions for a purpose that constitutes or presents the appearance of personal or organizational conflict of interest, or personal gain.

8. Will comply with the Intergovernmental Personnel Act of 1970 (42 U.S.C. §54726-4783) relating to the prescribed standards for all programs under one of the 19 statutes or regulations specified in Appendix A of OMB's Standards for a Model System of Personnel Administration (5 C.F.R. 900, Subpart F).

9. Will comply with the Lead-Based Paint Poisoning Prevention Act (42 U.S.C. §4801 et seq.) which prohibits the use of lead-based paint in construction, rehabilitation, or renovation of residence structures.

10. Will comply with all Federal statutes relating to non-discrimination. These include but are not limited to: (a) Title VI of the Civil Rights Act of 1964 (P.L. 88-352) which prohibits discrimination on the basis of race, color, or national origin; (b) Title IX of the Education Amendments of 1972, as amended (20 U.S.C. §§1681, 1683, and 1686-1688) which prohibits discrimination on the basis of sex; (c) Section 504 of the Rehabilitation Act of 1973, as amended (29 U.S.C. §794) which prohibits discrimination on the basis of handicaps; (d) the Age Discrimination Act of 1978, as amended (42 U.S.C. §§6101-6107), which prohibits discrimination on the basis of age; (e) the Drug Abuse Office and Treatment Act of 1972 (P.L. 92-255), as amended relating to nondiscrimination on the basis of drug abuse; (f) the Comprehensive Alcohol Abuse and Alcoholism Prevention, Treatment, and Rehabilitation Act of 1970 (P.L. 91-616), as amended, relating to nondiscrimination on the basis of alcohol abuse or alcoholism; (g) §§223 and 527 of the Public Health Service Act of 1982 (42 U.S.C. §§295c-d and 295c-8), as amended, relating to confidentiality of alcohol and drug abuse patient records; (h) Title VII of the Civil Rights Act of 1964 (42 U.S.C. §§2000e et seq.), as amended, relating to nondiscrimination in the sale, rental, or financing of housing; (i) any other nondiscrimination provisions in the specific statute(s) under which application for Federal assistance is being made; and (j) the requirements of any other nondiscrimination statute(s) which may apply to the application.
11. Will comply, or has already complied, with the requirements of Titles II and III of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (42 U.S.C. §§ 501-1606) which provide for fair and equitable treatment of persons displaced or whose property is acquired as a result of Federal and federally-assisted programs. These requirements apply to all interests in real property acquired for project purposes regardless of Federal participation in purchases.

12. Will comply with the provisions of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (42 U.S.C. §§ 501-1606 and 7524-7526) which limit the political activities of employees whose principal employment activities are performed in whole or in part with Federal funds.


14. Will comply with flood insurance purchase requirements of Section 400(a) of the Flood Disaster Protection Act of 1973 (L. 93-234) which requires recipients in a special flood hazard area to participate in the program and to purchase flood insurance if the total cost of insurable construction and acquisition is $10,000 or more.

15. Will comply with environmental standards which may be prescribed pursuant to the following: (a) installation of environmental quality control measures under the National Environmental Policy Act of 1969 (42 U.S.C. 4331-4354); (b) installation of facilities pursuant to EO 11514; (c) modification of existing facilities pursuant to EO 11988; (d) implementation of floodplain management policies; (e) implementation of floodplain administration policies in accordance with EO 11988; (f) assurance of project consistency with the approved State management program; and (g) federal contractors (as defined in 40 U.S.C. § 5151 et seq.) and construction facilities.

16. Will comply with the Wild and Scenic Rivers Act (16 U.S.C. §§ 1271 et seq.) related to protecting components or potential components of the national wild and scenic rivers system.


18. Will cause to be performed the required financial and compliance audits in accordance with the Single Audit Act Amendments of 1985 and OMB Circular A-133, "Audits of States, Local Governments, and Non-Profit Organizations.

19. Will comply with all applicable requirements of all other Federal laws, executive orders, regulations, and policies governing this program.

20. Will comply with the requirements of Section 106(g) of the Testing, Treatment, and Counseling for Drug Abuse Act (TVPA) of 2000, as amended (20 U.S.C. 710) which limits the implementation of Federal assistance to States and units of local government which have a program to ensure that Federal funds are not used to fund projects which are contrary to the policies, standards, and procedures set forth in federal law.

<table>
<thead>
<tr>
<th>SIGNATURE OF AUTHORIZED RECIPIENT OFFICIAL</th>
<th>TITLE</th>
</tr>
</thead>
<tbody>
<tr>
<td>[Signature]</td>
<td>Township Manager</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>APPLICANT ORGANIZATION</th>
<th>DATE SUBMITTED</th>
</tr>
</thead>
<tbody>
<tr>
<td>Township Council</td>
<td>02/04/2019</td>
</tr>
</tbody>
</table>

OMB Control No: 2506-0117 (exp. 06/30/2018)

Annual Action Plan

2019

69
CERTIFICATIONS

In accordance with the applicable statutes and the regulations governing the consolidated plan regulations, the jurisdiction certifies that:

Affirmatively Further Fair Housing — The jurisdiction will affirmatively further fair housing.

Uniform Relocation Act and Anti-displacement and Relocation Plan — It will comply with the acquisition and relocation requirements of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended, (42 U.S.C. 4601-4655) and implementing regulations at 49 CFR Part 24. It has in effect and is following a residential anti-displacement and relocation assistance plan required under 24 CFR Part 42 in connection with any activity assisted with funding under the Community Development Block Grant or HOME programs.

Anti-Lobbying — To the best of the jurisdiction’s knowledge and belief:

1. No Federal appropriated funds have been paid or will be paid, by or on behalf of it, to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with the awarding of any Federal contract, the making of any Federal grant, the making of any Federal loan, the entering into of any cooperative agreement, and the extension, continuation, renewal, amendment, or modification of any Federal contract, grant, loan, or cooperative agreement.

2. If any funds other than Federal appropriated funds have been paid or will be paid to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with this Federal contract, grant, loan, or cooperative agreement, it will complete and submit Standard Form-LLL, "Disclosure Form to Report Lobbying," in accordance with its instructions.

3. It will require that the language of paragraph 1 and 2 of this anti-lobbying certification be included in the award documents for all subawards at all tiers (including subcontracts, subgrants, and contracts under grants, loans, and cooperative agreements) and that all subrecipients shall certify and disclose accordingly.

Authority of Jurisdiction — The consolidated plan is authorized under State and local law (as applicable) and the jurisdiction possesses the legal authority to carry out the programs for which it is seeking funding, in accordance with applicable HUD regulations.

Consistency with plan — The housing activities to be undertaken with Community Development Block Grant, HOME, Emergency Solutions Grant, and Housing Opportunities for Persons With AIDS funds are consistent with the strategic plan in the jurisdiction’s consolidated plan.

Section 3 — It will comply with section 3 of the Housing and Urban Development Act of 1988 (12 U.S.C. 1701u) and implementing regulations at 24 CFR Part 135.

[Signature of Authorized Official]  [7/14/2020]

[Title]

Annual Action Plan
2019
Specific Community Development Block Grant Certifications

The Entitlement Community certifies that:

Citizen Participation — It is in full compliance and following a detailed citizen participation plan that satisfies the requirements of 24 CFR 91.105.

Community Development Plan — Its consolidated plan identifies community development and housing needs and specifies both short-term and long-term community development objectives that have been developed in accordance with the primary objective of the CDBG program (i.e., the development of viable urban communities, by providing decent housing and expanding economic opportunities, primarily for persons of low and moderate income) and requirements of 24 CFR Parts 91 and 570.

Following a Plan — It is following a current consolidated plan that has been approved by HUD.

Use of Funds — It has complied with the following criteria:

1. Maximum Feasible Priority. With respect to activities expected to be assisted with CDBG funds, it has developed its Action Plan to ensure that the grantee certifies that all CDBG funds are not used to displace households or to assist with activities that benefit the lower-income and moderate-income families or to assist in the prevention or elimination of slums or blight. The Action Plan may also include CDBG-assisted activities that the grantee certifies to meet other community development needs having particular urgency because existing conditions pose a serious and immediate threat to the health or welfare of the community, and other financial resources are not available (see Optional CDBG Certification).

2. Overall Benefit. The aggregate use of CDBG funds, including Section 108 guaranteed loans, during program years is 2019, shall principally benefit persons of low and moderate income in a manner that ensures that at least 70 percent of the amount is expended for activities that benefit such persons during the designated period.

3. Special Assessments. It will not attempt to recover any capital costs of public improvements assisted with CDBG funds, including Section 108 loan guarantees, by assessing any amount against properties owned and occupied by persons of low and moderate income, including any fee charged or assessment made as a condition of obtaining access to such public improvements.

However, if CDBG funds are used to pay the proportion of a fee or assessment that relates to the capital costs of public improvements (assisted in part with CDBG funds) financed from other revenue sources, an assessment or charge may be made against the property with respect to the public improvements financed by a source other than CDBG funds.

In addition, in the case of properties owned and occupied by moderate-income (not low-income) families, an assessment or charge may be made against the property for public improvements financed by a source other than CDBG funds if the jurisdiction certifies that it lacks CDBG funds to cover the assessment.

Excessive Force — It has adopted and is enforcing:

1. A policy prohibiting the use of excessive force by law enforcement agencies within its jurisdiction against any individuals engaged in non-violent civil rights demonstrations; and

2. A policy of enforcing applicable State and local laws against physically barring entrance to or exit from a facility or location which is the subject of such non-violent civil rights demonstrations within its jurisdiction.
Compliance with Anti-discrimination laws — The plan will be conducted and administered in conformity with Title VI of the Civil Rights Act of 1964 (42 U.S.C. 2000d) and the Fair Housing Act (42 U.S.C. 3601-3619) and implementing regulations.

Lead-Based Paint — Its activities concerning lead-based paint will comply with the requirements of 24 CFR Part 35, Subparts A, B, J, K and R.

Compliance with Laws — It will comply with applicable laws.

[Signature of Authorized Official]  [7/19/2020]
Date

[Title]

Township Manager