

Citizen Participation Plan for Consolidated Plan Programs Greenville County



GCRA

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Greenville County Redevelopment Authority
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Public Comment Draft

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Introduction

The Citizen Participation Plan (CPP) describes how the Greenville County Redevelopment Authority (GCRA), on behalf of Greenville County (the County) will solicit and include citizen input in the consolidated planning process to ensure that the County's goals and activities reflect the housing and community development priority needs of the County. The County receives an annual allocation from the U.S. Department of Housing and Urban Development (HUD), dictated by formula, for the following grant programs:

- Community Development Block Grant (CDBG);
- Emergency Solutions Grant (ESG);
- HOME Investment Partnerships Program (HOME).

HUD requires that grantees develop and implement a 5-year Consolidated Plan (Con Plan), 1-year Annual Action Plan (AP), and a Consolidated Annual Performance Evaluation Report (CAPER), hereafter collectively referred to as the Con Plan Reports. The Con Plan Reports are intended to furnish the framework whereby the County can identify housing, homeless, community, and economic development needs, recognize resources that will be tapped and actions to be taken to address those needs, as well as look back and evaluate the grantee's progress toward achieving its strategic goals. The requirements of the CPP are described in [24 CFR Part 91 Consolidated Submissions for Community Planning and Development Programs](#) and [24 CFR Part 91.105 Citizen Participation Plan; local governments](#).

Citizen participation and consultation is a foundational element of the consolidated planning process. Citizen participation and consultation ensures that input from a wide range of citizens, including planned and actual beneficiaries, people of low and moderate income, minorities, people with disabilities, people with limited English proficiency, service providers, advocacy groups, public and private agencies, and community leaders are incorporated into the development and implementation of the Con Plan Reports. The Greenville County Redevelopment Authority Board of Directors represents a cross-section of Greenville County citizens, and as such provides "community wide input." The Board of Directors is comprised of members representing each of the 12 single-member council districts of Greenville County and is appointed by County Council.

In 1994, HUD published regulations requiring agencies that administer the above formula grant programs to incorporate planning and application requirements into one master plan, the Con Plan. The new planning process was intended to more comprehensively address the goals of the CDBG, ESG, HOME, HTF, and HOPWA programs: to develop viable urban communities by providing decent housing and a suitable living environment and expanding economic opportunities principally for low- and moderate-income persons. To encourage participation in the Con Plan process among citizens and stakeholders, the County will follow the standards set forth in this CPP during development of the Con Plan Reports. Further, the CPP may also be applicable to other HUD funding, including special congressional appropriations, special allocations, and one-time grant awards, when the Federal Register notice or Notice of Funding Opportunity (NOFO) identifies [24 CFR Part 91](#) or any of the previously listed funding programs as the governing citizen participation standard.

A. Actions to Broaden Citizen Participation in the Consolidated Planning Process

The housing and community development programs covered by the Con Plan are designed to primarily benefit low- and moderate-income persons, including other targeted groups. The consolidated planning process involves determining needs and resources, setting priorities and goals, then administering and evaluating the outcomes of the program; that is, who was served, and how they were served.

The County will make an effort to encourage participation and input on the Con Plan Reports and the administration of the programs from all citizens, including the following targeted groups:

- Planned and actual beneficiaries of the programs;
- Residents of the Fountain Inn, Greer, Mauldin, Simpsonville, and Travelers Rest;
- Low- and moderate-income persons;
- Minorities;
- People with disabilities;
- Non-English-speaking persons or communities;
- Residents living in slums and blighted areas, and where HUD program funds are proposed to be used;
- Residents living in close proximity to proposed HUD funded projects;
- People experiencing homelessness.

To better reach the targeted groups mentioned above, GCRA may provide notices of the Con Plan Reports to the organizations with more frequent day-to-day contact with the targeted groups; these organizations may include, but are not limited to:

- Subrecipients;
- Housing development partners;
- Public and private agencies providing health care, education, employment, and fair housing services
- Social service providers including those serving children, elderly persons, persons with disabilities, persons with HIV/AIDS, victims of domestic violence, persons experiencing homelessness;
- Community Action Agencies (CAAs);
- Advocacy groups;
- Neighborhood groups;
- Community leaders;
- Government entities;
- Libraries;
- Schools;
- Faith based institutions;
- Continuums of Care;
- Homeless services providers;
- Businesses;
- Non-profit organizations;
- Philanthropic organizations.

GCRA will also consult with these groups for their input on the development of the Con Plan Reports. These organizations will be encouraged to circulate surveys, hold meetings on site, or publicize meetings at other locations, including virtual meetings. The means by which the GCRA will encourage citizen participation may include, but are not limited to, traditional publication in newspapers, e-mail and email lists, through its own and partner organization websites, social media, flyers, and signage in areas where HUD funding is proposed to be used.

B. Citizen Participation Plan Requirements for the Citizen Participation Plan - 24 CFR 91.115 (a)

Amendments to the CPP will follow the citizen participation process required for a Substantial Amendment to the Con Plan or AP. That process includes public notification, a public hearing, and a public comment period, and will provide citizens with a reasonable opportunity to comment on changes to the CPP before the amendment is finalized. Comments on the amendment from the above-named populations and organizations in Section A will be encouraged.

Revisions to the CPP will be effective upon completion of the public comment period and adoption by the Greenville County Redevelopment Authority Board, as authorized by Greenville County Council.

GCRA will provide a copy of the CPP in a format accessible to persons with disabilities upon request. Public notices will include a provision to request accommodation for persons with disabilities or of limited English proficiency. If virtual, language translation closed captioning will be optional for participants. If in person, language translation services or other reasonable accommodations can be arranged in advance. The procedure for public noticing, hearing, and commenting detailed in Section C. 2-4 will be followed when the CPP is amended. The public notice will include where the draft plan can be accessed for review; a copy will also be available at:

Greenville County Redevelopment Authority
301 University Ridge, Suite S-4300
Greenville, SC 29601
864-242-9801

C. Consolidated Plan, Annual Action Plan, or Other Plans

1. Assistance Expected, Activities, and Beneficiaries - 24 CFR 91.115 (b)(1)

Before the County finalizes the adoption of the Con Plan, it will publish the proposed plan for public review in a manner that affords citizens, public agencies, and other interested parties a reasonable opportunity to examine its contents and submit comments. The plan shall include:

- The amount of assistance the County expects to receive,
- The range of activities that may be undertaken, including the estimated amount that will benefit people of low and moderate income,
- Plans to minimize displacement of people and to assist any persons displaced.

The County will publish a notice for the proposed plan in several newspapers of general circulation at least two weeks before the public hearing. Copies of the notice will also be distributed to organizations signed up for email updates about these programs. Subrecipients will be encouraged to distribute the notice to the people they serve. Notice will be sent to organizations that participated in the consultation process for the Con Plan. The notice will include the websites and physical locations where copies of the entire proposed Con Plan may be obtained or examined.

Citizens and groups may obtain a reasonable number of free copies of the proposed Con Plan by contacting:

Greenville County Redevelopment Authority

301 University Ridge, Suite S-4300

Greenville, SC 29601

864-242-9801

Documents may be reviewed at the GCRA website, with the specific location indicated on the public notice. GCRA will provide a copy of the notice in a format accessible to persons with disabilities upon request.

2. Public Notice for Review of Plans - 24 CFR 91.115(b)(2)

GCRA will publish a notice indicating the dates of the public comment period, and a summary of the contents of the proposed Con Plan and AP in several newspapers of general circulation, as well as distribute the notice to interested parties through GCRA's email list. GCRA will encourage citizen and stakeholder participation from the groups aforementioned in Section A. The proposed plan will be available for review through the link in the public notice, or upon request to ph@gcra-sc.org.

3. Public Hearing on Housing and Community Development Needs - 24 CFR 91.115(b)(3)

GCRA will foster participation in the community needs assessment by encouraging participation from the general public and aforementioned groups in Section A.

GCRA will conduct a minimum of two public hearings for the development of the Con Plan to obtain citizens' views and to respond to proposals and questions. The hearings will take place at different stages of the consolidated planning process. At least one will occur prior to the development of the proposed plan and will be intended to solicit public input regarding distinct issues, thereby aiding policy formation. At least one hearing will occur after the proposed plan has been released for public review, allowing interested parties an opportunity to review the plan in its entirety, ask questions, and provide comments on the plan's proposed goals and activities.

Information about the time, location, and subject of each meeting will be provided to citizens at least two weeks in advance through public notice. This notification will be disseminated to the aforementioned groups in Section A, published in the local newspaper of general circulation and on the GCRA website. Additionally, GCRA will actively solicit input on housing and community development issues during the year with regional forums and working groups. Staff may also attend other meetings and conventions in the state throughout the year, thereby providing an opportunity for additional public information on the Con Plan or other planning efforts.

Every attempt will be made to ensure that public hearings are inclusive. Hearings will be held at convenient times and locations and in places where people most affected by proposed activities can attend, including virtually. GCRA will utilize facilities for hearings that are accessible to persons with mobility impairments. If given advance notice of a reasonable accommodation request, the GCRA will provide appropriate materials, equipment, and interpreting services to facilitate the participation of non-English speaking persons and persons with visual or hearing impairments. Interpreters will be provided at public hearings where a considerable number of non-English speaking residents can be reasonably expected to participate. All public hearings and public meetings associated with the consolidated planning process will conform to applicable South Carolina Open Meetings Law.

i. Advance Notice

GCRA will publish the public notice at least two weeks (14 calendar days) in advance of the public hearing. The public notice will contain:

- Con Plan or AP summary
- Amount of assistance the County expects to receive
- Range of activities to be undertaken and estimated beneficiaries
- Time and date of public hearing
- The date range of the public comment period and how to submit comments
- Where to review the draft Con Plan or AP
- How to request language translation services or reasonable accommodation for persons with disabilities.

The public notice will be provided to the groups aforementioned in Section A.

ii. Time and Accessible Location to Beneficiaries

In order to increase the likelihood of citizen participation, the GCRA will conduct the public hearing either virtually, in person, or as a hybrid of both formats. GCRA will choose a time, format, and location that will be most accessible to beneficiaries and interested parties. Public hearings will be recorded, if virtual, and allow for comments, questions, and answers.

iii. Non-English-Speaking Needs

Solicitation for language accommodation will be made in the public notice. Public notices distributed by the GCRA will be in English and Spanish. If the public hearing is in person and a request is received within the timeframe indicated on the notice, GCRA will provide translation services. For virtual meetings, translation features will be enabled through the virtual platform being used. GCRA will provide for American Sign Language translation if requested. GCRA will ensure residents will have equal access to federally funded programs and services as is required under Title VI of the Civil Rights Act of 1964.

4. Public Comment Period - 24 CFR 91.115(b)(4-5)

GCRA will receive comments from citizens and other interested parties on its draft Con Plan and AP for a period not less than 30 calendar days prior to submission of the Con Plan and AP to HUD. This public comment period will be indicated on the public notice. All comments on the Con Plan or AP received during the public comment period will be considered. A summary of these comments or views and a summary of any comments or views not accepted and the reasons therefore shall be attached to the final version of the plan and then published on the GCRA website. Comments may be made via email, in person, during a public hearing, through telephone, or through the contact information in the notice.

D. Amendments

1. Criteria for Substantial Amendment to Consolidated Plan, Annual Action Plan, or Other Plans - 24 CFR 91.115(c)(1)

The following actions taken by the GCRA will require a Substantial Amendment. A Substantial Amendment will involve the citizen participation process: public notice, public comment period, and public hearing:

- To add a new goal to the Con Plan or AP;
- To carry out an activity not previously described in the Con Plan or AP;
- To change the purpose, scope, location, or beneficiaries of an activity;
- Changes in the use of CDBG funds from one eligible activity to another, when the new use of funds has not been previously described in the AP.

i. Non-Substantial Amendments

Non-substantial amendments are any amendments needed to the Con Plan or AP that do not meet the conditions of a substantial amendment described above. Non-substantial amendment will not involve the public participation process. GCRA may update the plan and make an announcement informing its stakeholders of the update if the change is determined to be of interest to its stakeholders.

2. Notice and Opportunity to Comment - 24 CFR 91.115(c)(2)

The public notice and public comment period for a Substantial Amendment will follow the process as described in Section C. The groups mentioned in Section A will be solicited for their input on the Substantial Amendment. GCRA will hold one public hearing summarizing the changes and allowing for public comment.

Substantial Amendments will be available on the GCRA website. GCRA will provide a copy of the Amendment in a format accessible to persons with disabilities upon request.

3. Summary of Comments - 24 CFR 91.115(c)(3)

A summary of comments or views and a summary of any comments or views not accepted and the reasons why shall be included in the final version of the amendment. Comments may be made via email, in person, virtually during a public hearing, through telephone, or through the contact information in the notice. GCRA will consider any comments or views received in writing or orally at the public hearings in preparing the substantial amendment.

4. Urgent Needs

It may be necessary to amend the Con Plan or AP in the event of an emergency such as a natural disaster. These amendments may include funding new activities or the reprogramming of funds, including canceling activities, to meet community development needs that have an urgency. Therefore, GCRA may utilize its HOME, ESG, or CDBG funds to meet an urgent need without the normal public comment period which is otherwise required for substantial amendments.

GCRA will comply with the most recent HUD guidance on requesting flexibility on existing grants after a disaster is declared.

E. Performance Report – CAPER (Consolidated Annual Performance Evaluation Report) - 24 CFR 91.105(d)

The CAPER covering CDBG, HOME, and ESG program accomplishments is submitted by GCRA to HUD within 90 days after the end of the County's Program Year (July 1 – June 30). The CAPER also requires a public comment process.

1. Public Notice - 24 CFR 91.115(d)(1)

GCRA will publish a notice two weeks in advance of the public comment period in a newspaper of general circulation as well as provide notice to the aforementioned groups in Section A. Public notices will be in English and Spanish. The notice will contain a summary of the CAPER, its contents and purpose, how to provide public comment, as well as where to view the entire report. At GCRA's discretion, a public hearing may be held.

2. Public Hearing - 24 CFR 91.115(d)(1)

GCRA may elect to hold a public hearing. If one is held, the hearing may be virtual, in-person, or a hybrid meeting. GCRA will choose a time, format, and location that will be most accessible to beneficiaries and interested parties. Public hearings will be recorded, if virtual, and allow for comments, questions, and answers. Citizens and interested parties will be able to provide comments at hearings, as well as ask questions about the County's performance.

3. Public Comment Period - 24 CFR 91.115(d)(1)

GCRA will provide for a 15-day public comment period, the dates of which will be indicated in the notice. GCRA will consider any comments or views of citizens received in writing or orally at public hearings for the CAPER, and during the public comment period.

4. Summary of Comments - 24 CFR 91.115(d)(2)

GCRA will summarize, catalogue, and respond to comments, then include the public comments and responses in the final CAPER.

F. Availability to the Public - 24 CFR 91.115(f)

The following documents will be available to the public by viewing them on the GCRA website www.gcra-sc.org. Physical copies may also be viewed at the GCRA Office.

- CPP
- Con Plan
- AP
- Substantial Amendments
- CAPER

G. Access to Records - 24 CFR 91.115(g)

To the extent allowed by law, interested citizens and organizations shall be afforded reasonable and timely access to records covering the preparation of the Con Plan or AP, project evaluation and selection, HUD's comments on the Plan, and annual performance reports. In addition, materials on formula grant programs covered by the Con Plan or AP, including activities undertaken in the previous five years, will be made available to any member of the public who requests information. A complete file of citizen comments will also be available for review by interested parties. After receiving notice of HUD's approval of its Con Plan or AP, GCRA will inform those on its mailing list of the availability of the final Plan document.

H. Complaints - 24 CFR 91.115(h)

Citizens, administering agencies, and other interested parties may submit complaints and grievances regarding the programs to GCRA. Complaints should be in writing, specific in their subject matter, and include facts to support allegations. The following are considered in determining where a response is due:

- The administering agency has purportedly violated a provision of the CPP;
- The administering agency has purportedly violated a provision of federal CDBG, ESG, or HOME program regulations;
- The administering agency, or any of its contractors, has purportedly engaged in questionable practices resulting in waste, fraud, or mismanagement of any program funds.

Residents may also present complaints and grievances orally or in writing at community meetings or public hearings. All public comments, including complaints and grievances, made either orally or in writing within the 30-day public comment period, will be included in the final Con Plan or AP. Such complaints or grievances for CDBG, HOME, and ESG shall be directed to GCRA.

Greenville County Redevelopment Authority

301 University Ridge, Suite S-4300

Greenville, SC 29601

ph@gcra-sc.org

To view the GCRA policy on non-discrimination, and to submit complaints related to discrimination on the basis of race, color, national origin, age, sex, religion, familial status, disability, or in relation to how a GCRA program is being operated, or to submit a complaint, visit the GCRA website under Non-discrimination, Complaints Form <https://gcra-sc.org/complaint-form/>.

1. Timely Response to Complaints or Grievances

Upon receipt of a written complaint, the designated representative at GCRA shall respond to the complainant in writing within 15 calendar days, and maintain a copy of all related correspondence, which will be subject to review.

A copy of the response will be transmitted, concurrently, to the complainant and to the Executive Director. If, due to unusual circumstances, the designated representative finds that they are unable to meet the prescribed time limit, the limit may be extended by written notice to the complainant, which must include the reason for the extension and the date by which a response is expected to be generated, which may be based on the nature and complexity of the complaint.

All public review materials and performance reports will include data, as appropriate under confidentiality regulations, on any written complaints received and how each was resolved.

I. Technical Assistance - 24 CFR 91.105(i)

Groups or individuals interested in obtaining technical assistance from GCRA to develop project proposals or in applying for funding assistance through HUD formula grant programs covered by the Con Plan or AP may contact GCRA. Such assistance may be of particular use to community development organizations, nonprofit service providers, and for-profit and nonprofit housing development groups that serve or represent persons of low and moderate income. Pre-application workshops offer basic program information and materials to potential project sponsors, and staff members provide in-depth guidance and assistance to applicants and program participants on an on-going basis.

J. Affirmatively Furthering Fair Housing

GCRA will affirmatively further fair housing through implementation of its programs.