

CITY OF MARGATE, FLORIDA

RESOLUTION NO. 18-071

A RESOLUTION OF THE CITY OF MARGATE, FLORIDA, APPROVING SUBSTANTIAL AMENDMENTS TO THE CITY OF MARGATE COMMUNITY DEVELOPMENT BLOCK GRANT (CDBG) ANNUAL ACTION PLANS FOR FISCAL YEARS 2014 AND 2015; PROVIDING FOR CLARIFICATION OF PROJECT DESCRIPTIONS AND ANNUAL GOALS AND OBJECTIVES, REALLOCATION OF CDBG FUNDS TO OTHER ELIGIBLE ACTIVITIES, AND UPDATE OF THE CITIZEN PARTICIPATION PLAN; AUTHORIZING THE CITY MANAGER TO EXECUTE AND/OR SUBMIT ANY AND ALL RELATED DOCUMENTS TO THE U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT; PROVIDING FOR EFFECTIVE DATE.

BE IT RESOLVED BY THE CITY COMMISSION OF THE CITY OF MARGATE, FLORIDA:

SECTION 1: That the City Commission of the City of Margate, Florida, approves substantial amendments to the Community Development Block Grant (CDBG) Annual Action Plans for Fiscal Years 2014 and 2015, copies of which are attached and made part of this resolution, to provide for clarification of project descriptions and annual goals and objectives, reallocation of CDBG funds to other eligible activities, and to update the Citizen Participation Plan.

SECTION 2: That the City Commission of the City of Margate, Florida hereby authorizes the City Manager and staff to submit the amended CDBG Annual Action Plans for Fiscal Years 2014 and 2015, to the U.S. Department of Housing and Urban Development.

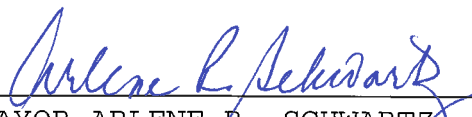
SECTION 3: That this Resolution shall become effective immediately upon its passage.

PASSED, ADOPTED AND APPROVED THIS 3rd day of July, 2018.

ATTEST:



JOSEPH J. KAVANAGH
CITY CLERK



MAYOR ARLENE R. SCHWARTZ

RECORD OF VOTE

Peerman	YES
Simone	YES
Ruzzano	YES
Caggiano	YES
Schwartz	YES



Substantial Amendment No 2 to the 2015-2019 Consolidated Plan and the related Action Plans. Previous Amendment was by Resolution No 17-080 approved May 17, 2017.

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Exhibits

- Exhibit A- Public Notice Ad – Sun Sentinel & City Website and City Facebook page
- Exhibit B- Public Comments Received
- Exhibit C- City Commission Approval

Background/Summary

The City of Margate is an entitlement recipient of federal funds from the U.S. Department of Housing and Urban Development (HUD) for the Community Development Block Grant (CDBG) Program. In FY 2014 the City was awarded \$345,675.00 and in FY 2015 the City was awarded \$337,661.00. In accordance with 24 CFR 91.505, the City of Margate is submitting a **Substantial Amendment** proposing the following changes to:

Clarify the Action Plans sections on “Project Description” (**AP-35**), “Annual Goals and Objectives” (**AP-20**), and “Project Summary” (**AP-38**) in the FY 2014 Action Plan and FY 2015 Action Plan to include “Acquisition, Administration and Planning, Economic Development, Housing, Public Improvements, Public Services” which are Program Goals clearly noted in “Expected Resources” in the “Priority Table” explaining the “Use of Funds” (**AP-15**). Update the FY2014 Action Plan;

- Update the FY2015 Action Plan;
- Reallocate CDBG funds in their respective Annual Action Plan to other Eligible Activities;
- Allocate Program Income to Eligible Activities; and
- Update the 2012 City of Margate’s Citizen Participation Plan.

Federal regulations require that a grantee provide citizens with reasonable notice of and an opportunity to comment on any Substantial Amendment to the Plan in accordance with 24 CFR 91.10. A detailed summary of the proposed changes are also outlined through this amendment. Revisions to the 2012 Citizen Participation Plan will also revise language for what constitutes a Substantial Amendment.

Substantial Amendment: This amendment to the Action Plan proposes the following changes to the CDBG activity budgets below:

Fiscal Year	Original Activity Name	IDIS Activity Number	Original Budget	Revised Budget	Reallocation Allocation Amount to Public Facilities
2014	Administration		\$ 69,135.00	0.	0.
2014	Housing Rehabilitation Administration		\$276,540.00	\$80,315.71 (Expended)	\$147,496.49
2014	Public Facilities		\$0.0	\$147,496.49	\$147,496.49
2015	Administration		\$67,532.20	0	0
2015	Housing Rehabilitation Administration		\$270,128.80	\$0.0	\$0.00
2015	Public Facilities		\$0.0	\$270,128.80	\$270,128.80
2014 & 2015	Program Income		\$28,677.76	\$28,677.76	\$28,677.76

The proposed changes to the CDBG Program budget will change the use of funds from Housing Rehabilitation to Public Facilities. Program funds in the amount of **\$518,040.41 and Program Income of \$28,677.76** will be reallocated to the “Public Facilities” activities and Administration.

A total of **\$446,303.05** – including Program Income is available for” Public Facilities” projects with CDBG FY 2014 and FY 2015 funding.

Program Income

The City generates Program Income from the sale of the homes rehabilitated or redeveloped with CDBG funds. The City is required to reinvest the Program Income to further the goals of the program. The CDBG Program Income will be used for items outlined in Annual Report section **AP-15** “Expected Resources” and “Anticipated Resources” which states that for the CDBG program the “Uses of Funds” includes “Acquisition, Administration and Planning Economic Development, Housing, Public Improvement, Public Services”.

Substantial Amendment	
Consolidated Plan & Action Plan to the Citizen Participation Plan	Program Years Affected
Substantial Amendment Language and Introduction of Program Income	2015-2019, 2014, 2015

The City will amend its Consolidated/Action Plan to carry out an activity not previously described or to substantially change the purpose, scope, location, or beneficiaries of an activity.

The City has, pursuant to HUD Regulation 24 CFR 91.505 developed the following criteria for what constitutes a substantial amendment:

- The measurable objective for an activity is revised 100% or more.
- The addition or deletion of one of the priority needs eligible activities listed in the Consolidated Plan’s Sections including:
 - AP-15 – Expected Resources
 - AP-20 - Annual Goals and Objectives
 - AP-35 - Projects
 - AP-38 – Project Summary
- An increase or decrease in the budgeted amount for individual Action Plan projects of thirty percent (30%) or more.
- Introduction of a project (budget line item) not listed in the current annual Action Plan.

The Substantial Amendment Details in the 2014 Annual Action Plan are:

- **AP-35 Projects:**

Introduction to be changed to read:

The City of Margate seeks to maximize funds available to low and moderate income residents by combining assistance from multiple grants including SHIP if necessary for home repair

programs. As such, the CDBG program provides 100% of the funding awarded to eligible recipients. The City of Margate CDBG projects will include home repair and public facilities and public improvements.

Public facilities and public improvements have been listed in the “Annual Goals and Objectives” in the Consolidated Plan and in the Action Plan. Funding in this fiscal year was only allocated to Home Repair. Given the difficulties with the Grant Program from 2014 until the completion of a Forensic Audit in 2017 all home repair programs were halted. These program funds will now be allocated to “Public Facilities” projects to benefit the wider community as allowed by the CDBG program. This activity is eligible under 24CFR 570.

#	Project Name
1	Public Improvements
2	Planning and Administration

Project Information

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

Public facilities and public improvements have been listed in the “Annual Goals and Objectives” in the Consolidated Plan and in the Action Plan. Funding in this fiscal year was only allocated to Home Repair. Given the difficulties with the Grant Program from 2014 until the completion of a Forensic Audit in 2017 all home repair programs were halted. These program funds will now be allocated to “Public Facilities” projects to benefit the wider community as allowed by the CDBG program. This activity is eligible under 24CFR 570.

- **AP-15 – Annual Goals and Objective notes.**
 - Use of funds indicates: Acquisition, Administration & Planning, Economic Development Housing, Public Improvements, Public Services.
 - Total Funds available noted is \$345,675.00.
- **AP-20 Annual Goals and Objectives notes:**
 - Funding for Annual Action Plan 2014 will be for \$276,540.00 for “**Needs Addressed**” to include: Preservation of Housing Owned by Low/Moderate Income Elderly and Preservation of housing owned by Low/Moderate Income Families.

Public facilities and public improvements have been listed in the “Annual Goals and Objectives” in the Consolidated Plan and in the Action Plan. Funding in this fiscal year was only allocated to Home Repair. Given the difficulties with the Grant Program from 2014 until the completion of a Forensic Audit in 2017 all home repair programs were halted. These program funds will now be allocated to “Public Facilities” projects to benefit the wider community as allowed by the CDBG program. This activity is eligible under 24CFR 570.

The Substantial Amendment Details in the 2015 Annual Action Plan are:

- **AP-35 Projects:**

Introduction to be changed to read:

Public facilities and public improvements have been listed in the “Annual Goals and Objectives” in the Consolidated Plan and in the Action Plan. Funding in this fiscal year was only allocated to Home Repair. Given the difficulties with the Grant Program from 2014 until the completion of a Forensic Audit in 2017 all home repair programs were halted. These program funds will now be allocated to “Public Facilities” projects to benefit the wider community as allowed by the CDBG program. This activity is eligible under 24CFR 570.

HUD regulations require the City to submit an Annual Action Plan detailing the upcoming projects for the program year, and specifying how activities listed in the Action Plan further the priorities and objectives established in the five year Consolidated Plan.

#	Project Name
1	Public Improvements
2	Planning and Administration

Project Information

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

Public facilities and public improvements have been listed in the “Annual Goals and Objectives” in the Consolidated Plan and in the Action Plan. Funding in this fiscal year was only allocated to Home Repair. Given the difficulties with the Grant Program from 2014 until the completion of a Forensic Audit in 2017 all home repair programs were halted. These program funds will now be allocated to “Public Facilities” projects to benefit the wider community as allowed by the CDBG program. This activity is eligible under 24CFR 570.

- **AP-15 – Annual Goals and Objective notes.**
 - Use of funds indicates: Acquisition, Administration & Planning, Economic Development Housing, Public Improvements, and Public Services.
 - Total Funds available noted is \$337,661.00.
- **AP-20 Annual Goals and Objectives notes:**
 - Funding for Annual Action Plan 2014 will be for \$270,128.80 for “**Needs Addressed**” to include: Public Facility and Improvement.

Annual Goals and Objectives

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

Goals Summary Information

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
4	Public Facility and Improvement	2015	2019	Public Facilities		The construction or installation of infrastructure improvements such as street improvements, or water and sewer lines. Neighborhood facilities such as libraries, police stations, recreational facilities, parks and playground will also be improved.		Improve infrastructure to the benefit of LMA households and those in the CRA area.

Table 1 – Goals Summary

Goal Descriptions

4	Goal Name	Public Facility and Improvement
	Goal Description	The City of Margate's goal is the construction or installation of infrastructure improvements such as street improvements, or water and sewer lines. Neighborhood facilities such as libraries, police stations, recreational facilities, parks and playground will also be improved.

Table 2 Goal Descriptions

AP-38 Project Summary - Project Summary Information - Project Summary

4	Project Name	Public Facility and Improvement
	Target Area	
	Goals Supported	The City of Margate's goal is the construction or installation of infrastructure improvements such as street improvements, or water and sewer lines. Neighborhood facilities such as libraries, police stations, recreational facilities, parks and playground will also be improved.
	Needs Addressed	The City of Margate needs to construct and or install of infrastructure improvements such as street improvements, or water and sewer lines. Neighborhood facilities such as libraries, police stations, recreational facilities, parks and playground also need to be improved.
	Funding	CDBG: \$270,128.80
	Description	The City of Margate's goal is the construction or installation of infrastructure improvements such as street improvements, or water and sewer lines. Neighborhood facilities such as libraries, police stations, recreational facilities, parks and playground will also be improved. This activity is eligible under 24 CFR 570.
	Target Date	9/30/2018
	Estimate the number and type of families that will benefit from the proposed activities	Improve infrastructure to the benefit of LMA households and all households who live or use the CRA area.
	Location Description	Improve infrastructure to the benefit of LMA households and those in the CRA area.
	Planned Activities	Public Facilities and Public Improvements.
2	Project Name	Planning and Administration
	Target Area	City-wide including Margate Community Redevelopment Area
	Goals Supported	Preserve Units Owned by Lo
	Needs Addressed	Planning and Administration
	Funding	CDBG: \$67,532
	Description	This activity will provide for administrative and planning duties relative to the overall grant program, and is eligible under 24 CFR 570.
	Target Date	9/30/2019
	Estimate the number and type of families that will benefit from the proposed activities	Planning and Administration N/A
	Location Description	Administration.
	Planned Activities	Administration.

Public facilities and public improvements have been listed in the “Annual Goals and Objectives” in the Consolidated Plan and in the Action Plan. Funding in this fiscal year was only allocated to Home Repair. Given the difficulties with the Grant Program from 2014 until the completion of a Forensic Audit in 2017 all home repair programs were halted. These program funds will now be allocated to “Public Facilities” projects to benefit the wider community as allowed by the CDBG program. This activity is eligible under 24CFR 570.



City of Margate

Citizen Participation Plan

May 2018

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- III. CONSOLIDATED PLAN DEVELOPMENT**
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- V. PERFORMANCE REPORTS ASSOCIATED WITH THE CONSOLIDATED PLAN**
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- VII. ACCESS TO THE CONSOLIDATED PLAN**
- VIII. COMPLAINTS ASSOCIATED WITH THE CONSOLIDATED PLAN**
- IX. DISPLACEMENT POLICY**
- X. NON-ENGLISH SPEAKING RESIDENTS**

I. Statement of Purpose:

This Citizen Participation Plan of the City of Margate seeks to provide for and encourage the participation of citizens in the development of the Consolidated Plan, any substantial

amendments to the Consolidated Plan, and the associated Annual Performance Report (CAPER). The Plan also provides for the participation of citizens in the development of applications for the City's Community Development Block Grant (CDBG) yearly allocation. The City especially aims to encourage participation by low and moderate income persons, the homeless, persons with disabilities, persons living with AIDs, and representative organizations of these groups. This Citizen Participation Plan has been designed to meet the requirements of the Housing and Community Development Act of 1974, as amended, and the Consolidated Submission for Community Planning and Development Programs Final Rule of the U.S. Department of Housing and Urban Development (HUD) as published on January 5, 1995.

II. Effective Date: This Citizen Participation Plan will become effective immediately with by Resolution of the City Commission on July 3, 2018.

III. Consolidated Plan Development

Upon approval of the Consolidated Plan by the City Manager, the City of Margate shall:

- A. Make available to citizens, agencies, and other interested parties information that includes the amount of funding Margate expects to receive from the Community Development Block Grant (CDBG), the date it is expected, and the activities the City plans to undertake with the funding.
- B. Publish the proposed Consolidated Plan in a manner that affords citizens and other interested parties a reasonable opportunity to examine its contents and submit comments. This published information will include a summary of the description of the contents and purposes of the Consolidated Plan and a physical location where a copy can viewed by the public. This
- C. Make available free of charge to interested citizens, copies of the proposed Consolidated Plan.
- D. Hold at least one public hearing on the proposed Consolidated Plan during a regularly scheduled City Commission meeting. The City of Margate will receive comments on the proposed Consolidated Plan from citizens and interested parties for a period of not less than thirty (30) days.
- E. Consider any and all comments received in writing or verbally at the public hearing when preparing the final Consolidated Plan. A summary of these comments will be attached to the Consolidated Plan when it is submitted to HUD.

IV. Substantial Amendments to the Consolidated Plan:

In accordance with 24 CFR Subpart f, Section 91.505 (a), (b), and (c) of the Community Development Block Grant regulations, when considering Substantial Amendments to the Consolidated Plan, the City of Margate shall:

- A. Amend the Consolidated Plan if any one of the following actions are proposed:
 - 1. A change in the City's allocation priorities or change in the method of distribution of funding received.

2. The City will amend its Consolidated/Action Plan to carry out an activity not previously described or to substantially change the purpose, scope, location, or beneficiaries of an activity. Substantial Amendments to the Consolidated Plan, Action Plan activity details include the following:

- The measurable objective for an activity is revised by 100% or more.
- The addition or deletion of one of the priority needs eligible activities listed in the Consolidated Plan's Sections such as, including:
 - AP-15 – Expected Resources
 - AP-20 - Annual Goals and Objectives
 - AP-35 - Projects
 - AP-38 – Project Summary
- An increase or decrease in the budgeted amount for individual Action Plan projects of thirty percent (30%) or more.
- Introduction of a project (budget line item) not listed in the current annual Action Plan.

V. Performance Reports Associated with the Consolidated Plan (CAPER):

When preparing Performance Reports associated the Consolidated Plan, the City shall:

- A. Provide citizens and all interested parties with reasonable notice and an opportunity to comment on performance reports associated with the Consolidated Plan. Reasonable notice must include a summary of the accomplishments and their effect on the households of low to moderate income. The summary must be published in a newspaper of general circulation and provide for an opportunity to comment in writing for a period of no less than fifteen (15) days before the performance report is submitted to HUD. The published summary shall indicate that written comments must be submitted to the City by a specified date.
- B. Consider any and all comments received in writing or verbally at the public hearing when preparing the final Consolidated Plan. A summary of these comments shall be attached to the Plan when it is submitted to HUD.

VI. Availability of the Consolidated Plan and Associated Documents to the Public:

The City of Margate shall make available to the public free of charge and upon request the final Consolidated Plan as adopted, any Substantial Amendments, and any related Performance Reports. A copy of the final Consolidated Plan will available for review in the Grants Section, City Manager's Office located in City Hall. Upon request, the City will also make available the final Consolidated Plan as adopted, any Substantial Amendments, and any related performance reports in a form accessible to persons with disabilities.

These documents will be available in "hard" copy at the Margate City Hall. Notices will be placed inside City Hall in areas that are regularly viewed by citizens who come to City Hall for various issues including to pay water bills, attend Citizen Academy events, attend City Commission meetings and other events.

The Consolidated Plan, Action Plan, CAPER and any Substantial Amendment documents will also be available on the City Website <http://margatefl.com/>

for review. Citizens will be encouraged to submit their comments to the Grants Manager. Comments will be included in the submission to HUD. The City Facebook Page <https://www.facebook.com/CityofMargateFL/> will notify citizens of the appropriate link on the City Website for review and comments. All items that are on the City Website have the option to “auto” translate into several languages including Spanish, French and Haitian Kreyol.

VII. Access to Records Associated with the Consolidated Plan:

The City will provide reasonable and timely access to information relating to the Consolidated Plan and the City’s use of assistance under the Community Development Block Grant programs during the proceeding five years.

VIII. Complaints Associated with the Consolidated Plan and Related Documents: The City will provide a timely, substantive written response within 15 (fifteen) working days to every written citizen complaint related to the Consolidated Plan, Substantial Amendments and associated Performance Reports.

IX. Displacement Policy

The City of Margate's CDBG program has been carefully designed to minimize displacement resulting from assisted activities. In the event such displacement occurs, it will result from the identification of dilapidated dwelling units which are unfit for human habitation during the program qualification process. In these cases persons displaced will be assisted according to the provisions of the Uniform Relocation and Real Property Acquisition Policies Act of 1970 (Uniform Act), as amended, and the City's local relocation policy.

X. Non-English Speaking Residents

In the case of public hearings where a significant number of non-English speaking residents can be reasonably expected to participate, the City will provide a translator. All items that are on the City Website have the option to “auto” translate into several languages including Spanish, French and Haitian Kreyol.

Public Comment Period

Federal regulations require for the City provide the public with reasonable notice of and an opportunity to comment on any Substantial Amendments in accordance with 24 CFR 91.10. The 30-day comment period will commence on May 31, 2018 and end on July 2, 2018.

The public is encouraged to comment upon the proposed Substantial Amendment by submitting written comments to Grants Manager, City Manager's Office, City of Margate, 5790 Margate Boulevard, FL 33063, or twbenjamin@margatefl.com. Prior to the adoption, the City of Margate will hold a Public Hearing on the proposed amendment. The meeting will take place on **Tuesday, July 3, 2018 at 6:30p.m.** during the City Commission meeting in Council Chambers at Margate City Hall at 5790 Margate Boulevard, Margate FL 33063. Interested parties are encouraged to attend and participate.

The City of Margate will consider any comments or views of residents, agencies, or other interested parties received in writing or orally at Public Hearings, in preparation of the Final Amendment. A summary of these comments will be included in the final documents. For additional information please contact Tanya Ward Benjamin, Grants Manager, at 954-935-5331 or at twbenjamin@margatefl.com.

Exhibit A

Public Notice Ad – Sun Sentinel, City Website, City Facebook Page

[Home](#)

Posted on: June 1, 2018

Public Notice - Comments Needed

PUBLIC NOTICE

Substantial Amendment to the 2015-2019 Consolidated Plan, Citizen Participation Plan and 2014, 2015 Action Plans

The City of Margate is an entitlement recipient of federal funds from the U.S. Department of Housing and Urban Development (HUD) for the Community

Development Block Grant (CDBG) Program. In FY 2014 the City was awarded \$345,675.00 and in FY 2015 the City was awarded \$337,661.00. In accordance with 24 CFR 91.505, the City of Margate is submitting a Substantial Amendment proposing the following changes to:

Clarify the Action Plans sections on "Project Description" (AP-35), "Annual Goals and Objectives" (AP-20), and "Project Summary" (AP-38) in the FY 2014 Action Plan and FY 2015 Action Plan to include "Acquisition, Administration and Planning, Economic Development, Housing, Public Improvements, Public Services" which are Program Goals clearly noted in "Expected Resources" in the "Priority Table" explaining the "Use of Funds" (AP-15).

Update the FY2014 Action Plan;

Update the FY2015 Action Plan;

Reallocate CDBG funds in their respective Annual Action Plan to other Eligible Activities;

Allocate Program Income to Eligible Activities; and

<http://margatefl.com/CivicAlerts.aspx?AID=82>



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A detailed description of the proposed Substantial Amendment including specifics on budgetary changes is located at the Grants Manager, City Manager's Office, City of Margate, 5790 Margate Boulevard, FL 33063, between the hours of 8:00 a.m. and 6:00 pm – Monday through Friday. In addition, the Substantial Amendment has been posted to the City's website at <http://margatefl.com/>.

Federal regulations require for the City provide the public with reasonable notice of and an opportunity to comment on any Substantial Amendments in accordance with 24 CFR 91.10. The 30-day comment period will commence on May 31, 2018, and end on July 2, 2018.

The public is encouraged to comment upon the proposed Substantial Amendment by submitting written comments to Grants Manager, City Manager's Office, City of Margate, 5790 Margate Boulevard, FL 33063, or twbenjamin@margatefl.com. Prior to the adoption, the City of Margate will hold a Public Hearing on the proposed amendment. **The meeting will take place on Tuesday, July 3, 2018, at 6:30 p.m. during the City Commission meeting in Council Chambers at Margate City Hall at 5790 Margate Boulevard, Margate FL 33063.** Interested parties are encouraged to attend and participate.

The City of Margate will consider any comments or views of residents, agencies, or other interested parties received in writing or orally at Public Hearings, in preparation of the Final Amendment. A summary of these comments will be included in the final documents. For additional information please contact Tanya Ward Benjamin, Grants Manager, at 954-935-5331 or at twbenjamin@margatefl.com.

IN ACCORDANCE WITH THE AMERICANS WITH DISABILITIES ACT (ADA), OF 1990, ALL PERSONS REQUIRING A SPECIAL ACCOMMODATION AT THIS MEETING BECAUSE OF A DISABILITY, PHYSICAL IMPAIRMENT, OR ENGLISH LANGUAGE DEFICIENCY, TO PARTICIPATE IN THESE MEETINGS, SHOULD CONTACT THE GRANTS OFFICE, AT THE CITY OF MARGATE LOCATED AT, 5790 MARGATE BOULEVARD, FL 33063 OR VIA TELEPHONE AT 954-935-5331 AT LEAST FIVE CALENDAR DAYS PRIOR TO THE MEETING, SO THAT ASSISTANCE CAN BE PROVIDED. THIS DOCUMENT MAY BE REQUESTED IN AN ALTERNATE FORMAT BY CONTACTING THE GRANTS OFFICE, AT THE CITY OF MARGATE LOCATED AT 5790 MARGATE BOULEVARD, FL 33063 OR VIA TELEPHONE AT 954-935-5331

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Posted on: May 18, 2018

<http://margatefl.com/CivicAlerts.aspx?AID=82>



6/4/2018

Exhibit B

Public Comments Received