

**TOWN OF MANCHESTER
CITIZEN PARTICIPATION
PLAN**

**FOR CONSOLIDATED PLAN AND
COMMUNITY DEVELOPMENT BLOCK GRANT PROGRAM**

**Manchester Planning and Economic Development Department
Designated Block Grant Agency
Adopted: May 6, 2021**

I. INTRODUCTION

The Citizen Participation Plan (CPP) is intended to ensure all Manchester residents have a meaningful opportunity to participate and comment on the development of the five-year Consolidated Plan, each corresponding Annual Action Plan, any Substantial Plan Amendments, the Assessment of Fair Housing (AFH) and each year-end Consolidated Annual Performance and Evaluation Report prior to their submission to the federal Department of Housing and Urban Development (HUD).

The Consolidated Plan is a five year plan required by HUD that details the overall strategy for meeting Manchester's housing and community development needs. Each corresponding Annual Action Plan establishes performance goals and details the proposed allocations of CDBG funds during a particular year. These plans must be developed with meaningful community input and submitted to HUD for review and approval. In addition, at the conclusion of each year, Manchester is required to produce a performance report, the Consolidated Annual Performance and Evaluation Report (CAPER). The CAPER is also required to be made available for public review and comment prior to submission to HUD.

This CPP recognizes that Manchester has a proactive local government; a public housing authority; numerous advisory boards and commissions formed under the auspices of the town government; formal and informal neighborhood organizations; and coalitions of human service agencies. The CPP incorporates efforts to include the ongoing work of these entities into the required HUD plans and reports.

The CPP strives to provide meaningful opportunity to all residents including targeted outreach to low- and moderate-income persons, persons with disabilities and persons residing in public and affordable housing. The methods of seeking public input are continuously being evaluated and improved.

Finally, as the Consolidated Plan and Annual Action Plans are required to be coordinated with regional efforts, the CPP will make efforts to secure input on HUD required plans and reports from regional organizations including but not limited to the Capitol Region Council of Governments, Partnership for Strong Communities, Capital

Workforce Partners, a regional workforce development agency, as well as the Balance of State Continuum of Care.

Citizen Participation Plans (CPP) must meet all of HUD's specific statutory requirements of the CDBG program. The Manchester Planning and Economic Development Department has been designated the community development agency and, as such, will be responsible for carrying out the CPP. The CPP is available on the Town's web site at www.townofmanchester.org via the Planning and Economic Development Department webpages.

The US Department of Housing and Urban Development (HUD) has provided waivers to Entitlement Communities. The goal of the waivers is to ensure public safety and to expedite the allocation of CDBG-CV funds to address community need during the coronavirus pandemic. The waivers permit virtual hearings and shorten public comment periods. The revisions to Manchester's Citizen Participation Plan afforded due to these waivers are noted within the document.

II. PROCESS FOR THE DEVELOPMENT OF THE CONSOLIDATED PLAN AND ANNUAL ACTION PLAN

Community Outreach, Public Hearings, and Meetings

1. Consultations with public and private organizations engaged in community development, housing and human services will be conducted. Non-profit, community-based, and faith-based organizations that provide services to low-moderate income persons, persons experiencing homelessness or housing instability, elderly, persons with disabilities, minority, and non-English speaking persons will be consulted. These consultations will include an overview of the process, timeline, and opportunities to provide additional input.
2. To foster inter-jurisdictional consultation, outreach will be conducted to identify and incorporate community planning activities of local boards and commissions such as the Manchester Planning and Zoning Commission's Plan of Conservation and Development; the Manchester Housing Authority's Annual Plan; and activities of the Manchester Housing and Fair Rent Commission and the Redevelopment Agency.

3. Efforts will be made to inform and seek input from regional organizations including- Capitol Region Council of Governments, Partnership for Strong Communities and Capital Workforce Partners, a regional workforce development agency, and the Balance of State Continuum of Care.
4. Notice of public hearings will be published in a newspaper of wide general circulation in Manchester to obtain citizen views. Notice of hearings shall be sent to public, governmental and nonprofit agencies or groups which may conduct activities that benefit low-moderate income persons, minorities, non-English speaking persons and persons with disabilities.

All public hearings or meetings shall be noticed at least twice in a newspaper of wide general circulation in the town. The first notice shall appear at least 14 days before any public hearing or meeting and the second notice shall appear not less than 2 days before any public hearing or meeting. Town social media outlets will also be used to distribute notice of hearings to a broad audience.

Public hearings will be held in an accessible building at a location convenient to potential and actual beneficiaries to promote the broadest possible attendance. Methods to request reasonable accommodations and/or translation services will be included in the posting.

Public hearings will be held virtually in accordance with HUD's CDBG-CV waiver. Virtual hearings will be used as a substitute for in-person meetings as long as public health guidelines recommend social distancing and limitations on public gatherings.

The first hearing shall focus on community needs, available resources, CDBG program performance, and the process and schedule for development of the Consolidated Plan/Action Plan; a second hearing shall present the draft document.

5. A summary of all public input and any written comments received will be reviewed by the Town Board of Directors. No new project proposals shall be considered after this action except for applications submitted by the deadline.

6. Copies of the draft Consolidated Plan and Action Plan will be made available for public review at both branches of the Manchester public library system, the Planning and Economic Development Department and the Citizen Service Center. A reasonable number of free copies of the plans will be given to citizens and groups upon request.

The draft documents will be posted online in accordance with HUD's CDBG-CV waiver. Public review will be limited as long as public health guidelines recommend social distancing and limited public gatherings.

7. The public is provided a 30 day public comment period for the Consolidated Plan/Annual Action Plan from the release of the draft document. All comments received during the 30 day period will be responded to and included within the applicable plan. Written comments shall be responded to in writing by the Planning and Economic Development Department within fifteen (15) working days whenever practical.

The public comment period will be shortened to five (5) days in accordance with HUD's CDBG-CV waiver.

8. The Plan shall be submitted to HUD after the expiration of the public comment period.

III. PROCESS FOR DEVELOPMENT OF THE CONSOLIDATED ANNUAL PERFORMANCE AND EVALUATION REPORT

1. The draft Consolidated Annual Performance and Evaluation Report (CAPER) will be posted for public comment on the Town's website.
2. Notice of a public hearing to present the draft CAPER will be carried out consistent with the process, and conditions, detailed within the Consolidated Plan/Annual Action Plan (Section II. 3). The CAPER requires one public hearing, which will be a presentation of the draft document.
3. The CAPER shall be submitted to HUD after the expiration of a 15-day comment period.

IV. AMENDMENTS TO THE CONSOLIDATED PLAN AND/OR ANNUAL ACTION PLAN

An amendment to the Consolidated Plan or Annual Action Plan will be required to:

1. Undertake an activity not previously described or funded within the applicable Action Plan, or
2. The plan is a substantial change as defined by:
 - a. When more than 25% of funds in any approved activity or project is transferred to another activity or project in an approved Action Plan.
 - b. A change in the purpose, scope, location or beneficiaries of an activity if such change is deemed to constitute a new activity not previously listed in the Action Plan.
 - c. A change in the method of distributing funds if the alternate method is not provided for in the Citizen Participation Plan.

The amendment process for the Consolidated or Annual Action Plan requires:

1. A public hearing to present the draft Substantial Amendment
 - a. Notice of the hearing will be carried out consistent with the process detailed for the Consolidated Plan/Annual Action Plan (see Section II. 3).
2. A public comment period of at least 30 days for citizens to review the substantial amendment and submit comments either at the public hearing or in writing to the department.
3. Any public comments of relevance will be summarized and sent to HUD with the substantial amendment submission.

The public hearing will be held virtually.

The draft document will be available on the Town's website.

These procedural revisions will be in effect as long as public health guidelines recommend social distancing and limited public gatherings.

The public comment period will be shortened to five (5) days in accordance with HUD's CDBG-CV waiver.

V. TECHNICAL ASSISTANCE

To the degree possible given staff resources, technical assistance will be provided to agencies or groups representing low- and moderate-income persons or neighborhoods. Technical assistance may include further explanation of CDBG program requirements, providing or identifying necessary supporting documentation for a proposed activity, and otherwise assisting in the preparation of a proposal for a grant activity to be submitted to the town for consideration in its CDBG program.

VI. ACCESS AND AVAILABILITY OF RECORDS

The records, documents and policies of the CDBG program and Consolidated Plan process including Annual Action Plans, substantial amendments and performance reports shall be available to the public and open for inspection consistent with town policy and the requirements of the State Freedom of Information Act. These records and policy statements will include but not be limited to the Citizen Participation Plan; Consolidated Plan and Action Plan; notes or records from public hearings; correspondence; other required plans, policies or certifications associated with the program.

VII. ADOPTION OF AND CHANGES TO THE CITIZEN PARTICIPATION PLAN

The Citizen Participation Plan shall be adopted by the department, after a comment period during which residents will have an opportunity to comment. It may be altered by the department in response to changes in program requirements from HUD or to otherwise make the process more effective.

VIII. RESIDENTIAL ANTI-DISPLACEMENT AND RELOCATION ASSISTANCE POLICY AND PLAN

It shall be the policy of the town to avoid, to the greatest extent possible, the funding of activities which will result in the involuntary and permanent displacement of low- or moderate-income households or persons.

In the event the town finds that an assisted activity is necessary to benefit low- or moderate-income households, eliminate slums or blight, or is necessary for public health and safety, and the activity will result in displacement, the town shall follow the uniform Relocation Assistance and Rural Property Acquisitions Policies Act of 1970 and HUD implementing regulations at 24 CFR part 42. If residential displacement is necessary, the town shall provide or cause to be provided one for one replacement units in accordance with 570.606 (b)(1) and provide or cause to be provided relocation assistance in accordance with 570.606 (b)(2).

Reasonable relocation assistance will be provided to persons, businesses, nonprofit organizations and farms if their displacement is the result of an assisted activity to acquire or substantially rehabilitate property. In addition, the town will follow the optional relocation assistance requirements of 570.606(d) of the CDBG regulations.

In keeping with its policy to avoid displacement to the greatest extent possible, the town will require any property owner or agency requesting assistance for an activity which will result in displacement to show that the displacement cannot be avoided and to justify the activity's benefit if displacement is necessary. The applicant shall be required to identify a supply of comparable replacement units and provide an estimate of relocation assistance costs as part of the activity funding request. A schedule which integrates the relocation activities with the schedule for the project itself must also be provided. All of these items must be in place and will be taken into consideration before the town agrees to fund any activity which will result in displacement.

Each occupant of a project to be affected by an activity which will result in displacement will be provided written information on their rights under applicable federal, state and local law. In the event that relocation is necessary, town staff will meet tenants, either individually or in groups as appropriate, to explain:

1. Rights under federal fair housing law, state and local laws.
2. Owner, tenant and town responsibilities.
3. How to find acceptable replacement housing.
4. Opportunities to select replacement housing from a range of

neighborhoods within the total housing market.

5. Enforcement agencies and complaint procedures.

No tenant shall be considered displaced if the tenant has been offered a decent, safe and sanitary dwelling unit in a project rehabilitated under the CDBG rehabilitation program at an affordable rent defined by the HUD fair market rent schedule.