

Town of Greenwich **Citizen Participation Plan** **ANNUAL HUD CDBG ALLOCATION**

Part 1: Applicability

In accordance with 24 CFR Part 91, jurisdictions are required to adopt a Citizen Participation Plan to ensure citizen participation in developing the Consolidated Plan. The Town of Greenwich (the "Town") has previously adopted a Citizen Participation Plan ("CPP" or the "Plan") that meets the standards of Section 104(a)(3) of the Housing and Community Development Act of 1974 (42 U.S.C. 5304(A)(3)), et al. The Town will review and update its Plan annually, as needed, to conform and adapt to changes in the Community Development Block Grant ("CDBG") Program, as well as regulations and policies enacted by the U.S. Department of Housing and Urban Development ("HUD"), the Town and general best practices. Although the requirements are designed specially to encourage participation by very low-, low- and moderate-income persons, the Town shall make every effort and take whatever actions (as appropriate) to encourage the participation of all its citizens including minorities and non-English speaking persons as well as persons with mobility, visual or hearing impairments.

Further, the Town shall encourage the participation of residents of public and assisted housing developments, through consultation with the public housing authority and other nonprofit agencies that manage housing developments along with other low-income residents in the community. The Town shall also make an effort to provide information to the public housing authority about Consolidated Plan activities related to its developments and surrounding communities so that the public housing authority can make such information available at its annual public hearing.

Part 2: Required Elements of the Citizen Participation Plan

Encouragement of Citizen Participation. The Town shall encourage its citizens to participate in the development of the Consolidated Plan, Annual Action Plans, amendments to the Consolidated Plan and Annual Action Plan and the Consolidated Annual Performance Evaluation Report ("CAPER"). The inclusive and collaborative process shall provide for genuine citizen participation and diversity of experiences and perspectives. The strategy shall be a continuation of the current Community Development Advisory Committee ("CDAC") to investigate, evaluate, prioritize and recommend projects/activities that meet the identified needs and goals of very low-, low- and moderate-income persons in the community. The Community Development Advisory Committee shall not exceed a total of thirty members comprised of a combination of representatives from: each of the twelve Representative Town Meeting districts, Board of Estimate and Taxation, Greenwich Housing Authority, Board of Human Services, Board of Health, Planning and Zoning Commission, the League of Women Voters and local community agencies that represent minority, handicapped and other typically underrepresented populations.

In the event that CDAC membership reaches the maximum limit of 30, other interested individuals shall be put on a list and will be notified as soon as a position becomes vacant and available. Further, the Town shall encourage the individuals to attend CDAC meetings representing the general public through

public notices and information made available on the Town website. Their input, comments and views shall be considered following the actions stated under the Comments and Complaints part of this Plan.

Information to Be Provided/Consolidated Plan and Annual Action Plan Process. The Citizen Participation Plan shall ensure that citizens are furnished with appropriate information in order for the Town to develop its Consolidated Plan. To accomplish this, the Town shall develop an application and review process for its Consolidated Plan. For the purpose of this Citizen Participation Plan, the Consolidated Plan/Annual Action Plan processes are meant to incorporate drafting and updating the Analysis of Impediments to Fair Housing.

The CDBG Program Year to be made part of the Consolidated Plan shall be from July 1st through June 30th of the following year. The program planning and funding process shall begin in January/February through the notice of funding availability, publication of a citizen participation calendar to be published on the Town's website and distributed at public meetings and through the first meeting of the CDAC to review past program performance and discuss the allocation process associated with the Annual Action Plan.

The Community Development Office is to provide members of the CDAC with a summary of applications for CDBG funding received, as well as a copy of all applications deemed eligible for funding. CDAC will form subcommittees through which members will conduct on-site visits (when possible) and interview applicants regarding their funding proposals. The CDAC will then hold a public hearing at which CDBG applicants and members of the community are invited to offer their input on community needs to be addressed through the CDBG Program.

Following the CDAC public hearing, the First Selectman shall receive the CDAC funding recommendations and hold another public hearing to receive comments from interested stakeholders. The proposed draft Consolidated Plan/Annual Action Plan shall then be made available for public review/comment for a period of not less than 30 days, except in certain circumstances described below. The draft Consolidated Plan/Annual Action Plan shall then be transmitted to the Board of Estimate and Taxation ("BET") for approval prior to forwarding to the Representative Town Meeting ("RTM") for final approval prior to submission to HUD's Hartford Field Office.

The Town shall comply with citizen participation requirements at 24 CFR 91.105 throughout the development of its Consolidated Plan/Annual Action Plan/CAPER/Analysis of Impediments to Fair Housing as follows:

1. The citizen participation calendar shall illustrate the citizen participation process and identify the time, date and place of each meeting, submission deadline, etc. for the Consolidated Plan and other associated plans/reports. Such information shall be made available to the public through mailings/emails, the Community Development Office, legal advertisements/public notices in the local newspaper and all other means of media announcements (as appropriate and applicable).
2. The Notice of Fund Availability ("NOFA") shall be published annually in the local newspapers, provided through a Town-wide email distribution list and all other means of media announcements (as appropriate and applicable). The mailing list shall consist of a diverse and broad range of nonprofit social service agencies in the community (primarily those serving very-low, low- and moderate-income persons) including affordable housing providers, healthcare

providers, senior citizen program providers or advocates, daycare centers and educational or recreational program providers. The NOFA and application package shall provide information to citizens regarding the estimated amount of funds that the Town of Greenwich expects to receive, the range of activities that may be undertaken with CDBG funding and the income limits of persons benefiting from such activities. Interested persons and/or agencies shall be provided sufficient time to apply for said funds (with a minimum of 30 days from the date of the NOFA, except in certain circumstances as described below).

3. Announcements of the public hearing(s) to solicit comments on the Consolidated Plan/Annual Action Plan and community developments needs shall be published in the newspaper and on the Town's website. Further, the citizen participation calendar shall be made available at public hearings and on the Town's website. The dates of public meetings and hearings shall be published on the Town website and in the local newspaper with the NOFA at the beginning of the application and allocation planning process, with reminders published closer to the dates of the public hearings.
4. A notice regarding the availability of the proposed Consolidated Plan for public review and comment shall be published in the local newspaper and on the Town's website. A draft copy of the Consolidated Plan shall be made available on the Town's website, with a hard copy available for public review in the Community Development Office. The Town shall provide a 30-day comment period, at a minimum, for comments from citizens or local boards and agencies on the proposed Consolidated Plan, except in certain circumstances as noted below. Public notice of the availability of documents for review shall state that hard copies of documents are available for review in the Community Development Office, and other locations, as applicable.
5. The Town shall publish and make available for review other documents relating to the Consolidated Plan as may be required by HUD from time to time, including environmental review, amendments, etc.
6. HUD-provided data will be made available through publicly available versions of the Consolidated Plan/Annual Action Plan/CAPER/Analysis of Impediments to Fair Housing. The Town will cite HUD-provided data as appropriate that has been incorporated into these documents. This data, included in the applicable documents/plans, will be made available on the Community Development webpage.

Anti-Displacement and Relocation Plan. The Town shall require for the provision of relocation assistance, as described in 24 CFR 570.606 (as amended), to each low- and moderate-income household displaced by the demolition of housing, by rehabilitation of existing housing or by the conversion of a low- and moderate-income dwelling to another use as a direct result of Town of Greenwich CDBG-assisted activities. A more detailed Residential Anti-displacement and Relocation Assistance Plan Policy and Procedures is on file in the Community Development Office and available for public review upon request.

Environmental Reviews. The Town shall provide proper notice, pursuant to HUD environmental review regulations and the length of the review period required by review type, in the local newspaper, and make a copy of its environmental review record available for public access in the Community Development Office.

Access to Records. Program records, regulations, applicable census data, acts, statutes, environmental review reports, performance reports and other information relating to the Consolidated Plan shall be on file at the Community Development Office and available to the public upon request. Access to program records, etc., shall be consistent with the Freedom of Information Act, as amended. Any citizen, public agency and/or other interested party shall have reasonable and timely access to information and records relating to the Consolidated Plan and the Town's use of assistance during the preceding five years. The Town shall respond to any requests at a reasonable and timely manner, and consistent with Freedom of Information Act regulations.

Technical Assistance. Upon request, the Community Development Office shall provide technical assistance in developing proposals for funding assistance under any of the programs covered by the Consolidated Plan. Technical assistance may be provided on an individual basis (if needed) and/or may be provided (in general) through information included in the NOFA announcement, precontract meetings and subrecipient monitoring policies and procedures.

Public Hearings and Public Meetings. The Town shall schedule public hearings and public meetings pursuant to the applicable HUD regulations related to the Consolidated Plan. At a minimum, the Town shall schedule two public hearings at different stages of the program year to obtain citizens' views on housing and community development needs (including priority nonhousing community development needs), development of proposed activities and review of program performance.

1. The first public hearing shall be scheduled in January/February to be held by the Community Development Office to gather citizens' views and input on the Town's housing and community development needs including priority non-housing community development needs. This hearing will also be an opportunity for the Community Development Office to provide an update on current/prior year program performance. A second public hearing will be held in April/May to solicit input on proposed Consolidated Plans/Annual Action Plans, and updates to the Citizen Participation Plan and Analysis of Impediments to Fair Housing, as needed.
2. Public meetings and public meetings on the Consolidated Plan/Annual Action Plan shall be scheduled at times and dates convenient to the general public and program beneficiaries. In addition, these public hearings and public meetings shall be held in buildings that are accessible to persons with disabilities. If, according to census data, there is not a significant number of non-English persons or hearing impaired persons in the community to necessitate the services of an interpreter at all meetings and/or public hearings, then the Town shall make arrangements to accommodate the needs of non-English speaking persons or hearing impaired persons at the meetings or public hearings, as needed and upon request. The Town shall make every effort to accommodate requests from non-English speaking persons or hearing impaired persons to the extent feasible.

Pursuant to the Town's Accessibility Compliance and Best-Practice Policy, the following notice shall be included in all official Town publications, including meeting notices:

"The Town complies with all applicable federal and state laws regarding non-discrimination, equal opportunity, affirmative action, and providing reasonable accommodations for persons with disabilities. If you require an accommodation to participate, please contact the

Commissioner of Human Services at 203-622-3800 or alan.barry@greenwichct.org as soon as possible in advance of the event.”

Comments and Complaints. The Town shall consider any comments or views of citizens received in writing or orally at the public hearings, or in writing via mail, email or web form in preparing the Consolidated Plan, the Annual Action Plan, any amendments to the plan, environmental reviews, the Analysis of Impediments to Fair Housing or the CAPER. Records of the minutes of each CDAC meeting and all public hearings on the Consolidated Plan shall be on file in the Community Development Office and the Town’s website, and shall be made accessible/available for public review or comment.

The Town shall provide a minimum of 30 days for the citizens to submit their comments and input on the Consolidated Plan, the Annual Action Plan, and any amendments to the plan, except in certain circumstances as noted below. The Town shall provide a minimum of fifteen days for the citizens to submit their comments and input on the performance report.

The Town shall respond to complaints from citizens related to the Consolidated Plan, the Annual Action Plan, amendments and the CAPER following the guidelines and procedures set forth by HUD through regulations governing the CDBG Program. At a minimum, the Town shall respond to written inquiries and/or complaints pertaining to its Consolidated Plan, Annual Action Plan and/or the CAPER within fifteen working days from receipt of said inquiry or complaint. Further, a summary of the comments and/or views including a summary of any comments and/or views not accepted (and the reason therefore) shall be attached to the Consolidated Plan, Annual Action Plan, amendment to the plan and/or CAPER.

Amendments to the Consolidated Plan/Annual Action Plan. This section sets forth the procedures the Town shall follow in amending its Consolidated Plan and/or related Annual Action Plans.

The Town of Greenwich will amend its approved Consolidated Plan whenever it makes one of the following decisions:

- to make a change in its allocation priorities or a change in the method of distribution of funds;
- to carry out an activity using funds from any program covered by the Consolidated Plan (includes program income) not previously described in its Annual Action Plan; and/or
- to significantly change the scope, location, or beneficiaries of an activity.

Prior to implementing any substantial change, the Town will provide citizens with information on any proposed amendment(s) by publishing a public notice of the proposed amendments in the local newspaper, and by posting a description of the proposed amendment(s) to the Town website. The Town will provide at least 30 days for citizens to submit written or oral comments or views on the proposed amendment(s). The Town will consider these comments or views of citizens in preparing the substantial amendment of the Consolidated Plan pursuant to the procedures detailed above. A summary of these comments or views, and a summary of any comments or views not accepted and the reasons therefore, will be attached to the substantial amendment of the Consolidated Plan. The Town will also comply with any additional actions required by local law.

A substantial change to the allocation of funds in the Annual Action Plan requiring an amendment will be defined as the use of funds for a project/activity not previously identified, or the increase/decrease by transfer/reallocation of funds in excess of 20% of the original allocation between existing projects and programs. If such an amendment is required, a notice stating the reason, amounts and projects to be affected will be published at least fifteen (15) days prior to a public hearing to receive comments on the proposed amendment to the Annual Action Plan.

Upon completion, the Town shall make the amendments to the Consolidated Plan public and notify HUD that an amendment has been made. The Town shall take all required actions in accordance with all applicable HUD and local Town regulations to ensure that the public has been notified of any amendments through public notices, legal advertisements and all other means of media announcements (as appropriate and applicable). The Town shall submit a copy of each amendment to HUD as it occurs or at the end of the program year via the CAPER.

Exceptions to Citizen Participation Plan Requirements/HUD Waivers. In response to the COVID-19 public health outbreak of early 2020, *the Coronavirus Aid, Relief and Economic Security ("CARES") Act* provides flexibility for CDBG grantees to use CARES Act funding, and authorizes HUD to grant waivers and alternative requirements for its Community Planning and Development programs. The Town has updated its Citizen Participation Plan to include the following policies and procedures related to the flexibilities and waivers authorized by the CARES Act:

1. The Town has updated its Citizen Participation Plan to establish expedited procedures to draft, propose or amend consolidated plans.
2. Citizens will be provided notice of availability to comment on the Town's Consolidated Plan, Annual Action Plan, Analysis of Impediments to Fair Housing and updated Citizen Participation Plan, with a minimum opportunity to comment of five (5) days. The five-day comment period for any/all documents and plans may run concurrently.
3. In-person public hearings will not be required and may be substituted with virtual hearings if the following conditions are met:
 - a. National/local health authorities recommend social/physical distancing and limiting public gatherings for health reasons; and
 - b. Virtual hearings provide reasonable notification and access for citizens, timely responses from local officials to questions and comments and public access to all questions and responses.

As with all of its in-person meetings and hearings, the Town will provide a publicly accessible link to virtual meetings on its homepage, as well as a copy of meeting minutes and recordings/transcripts (when possible/allowable).

4. The Town will notify the HUD Hartford Field Office of its intent to utilize waivers provided for in the CARES Act by email, with a copy to the dedicated waiver inbox as well as to the CPD Director.
5. The Town will include in its public notice(s) that it intends to amend its Citizen Participation Plan, the amount of CARES Act/CDBG-CV funding that it expects to receive and that it intends to use said funds specifically to "prevent, prepare for and respond to" the COVID-19 outbreak.

Contact Information. All correspondence, comments, questions or requests for information regarding the Consolidated Plan, Annual Action Plan, CAPER, Citizen Participation Plan and/or CDBG activities should be directed to:

Tyler Fairbairn, Community Development/Grants Administrator
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Community Development Office
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203-622-3791
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