

**Township of Cherry Hill,
Citizen Participation Plan
Community Development Block Grant (CDBG) Program**

As of 3/17/23

In accordance with guidelines established by the US Department of Housing & Urban Development (HUD) in 24 CFR 91.105 and 91.505, the Township of Cherry Hill is revising the Citizen Participation Plan for the Community Development Block Grant (CDBG) program.

Purpose

The primary goal of a Citizen Participation Plan is to provide citizens, especially low and moderate income citizens of the community where CDBG-funded activities will take place, an opportunity to participate in a role in the planning, implementation, and assessment of the programs and projects. The Citizen Participation Plan establishes procedures for obtaining the views of citizens, public agencies, and other interested parties regarding the use of CDBG funds. Citizen input is essential in the following areas of the CDBG process:

- Identification of housing and community development needs;
- Development of the 5-year CDBG Consolidated Plan;
- Development of the Annual Action Plans (one for each year for five years);
- Development of the Citizen Participation Plan;
- Substantial amendments to the Consolidated Plan or the Annual Action Plan; and
- Review of program performance (Annual performance report (CAPER)).

Stakeholder Participation: Plan Development

The participation of all Township of Cherry Hill residents will be encouraged, including minorities, non-English speaking persons, and persons with disabilities, and the Township will take the appropriate actions to encourage this participation. It is the intent of this Plan that Citizen participation will be accomplished through informal meetings, outreach, public hearings, as well as public comment periods so that the community will become knowledgeable about the CDBG Program and can contribute some ideas to solving some of the community's needs.

There will be a minimum of two (2) public hearings for each program year. Additional public hearings may take place for proposed substantial amendments to the 5-year CDBG Consolidated Plan or an Annual Action Plan, to seek input on CDBG program performance, or if otherwise desired.

Public Hearing 1: Identification of Community Needs and Receipt of Ideas for Activities

Overview. The first public hearing shall be held to gather input and ideas in the development of the 5-year CDBG Consolidated Plan and each subsequent Annual Action plan (one each year for five years) in order to obtain the views of citizens, local public and non-profit agencies, philanthropic organizations, and community-based and faith-based organizations, as described below. Notice of the time, date and place of each public hearing shall be provided at least **ten (10) days** prior to the scheduled public hearing in accordance with the 'General Requirements for all Public Hearings below.' This first public hearing shall occur before any proposed consolidated or annual plan is published for comment.

Topics. The first public hearing will review the following matters:

- Total amount of anticipated CDBG Grant Funds available
- CDBG program National Objectives
- CDBG program Eligible Activities and targeted populations
- CDBG program requirements
- Review of previous program year(s) use of CDBG funds
- Public input on community development and housing needs, particularly of low and moderate income residents and targeted populations under the CDBG program
- Public input on suggestions for proposed use of CDBG funds
- Public input and comment on all aspects of the Township's CDBG program performance (see general requirements below)

Preparation of Draft Plan. After the first public hearing identifying needs and gathering ideas for activities, the Department of Community Development shall cause the preparation of a Draft 5-year Consolidated Plan (and/or draft Annual Action Plan, whichever is applicable) and shall post a copy of the proposed Plan on the Township website.

Comment Period. Notice of the availability of the document will be published in the non-legal section of the *Courier Post*, posted on the Township website, and notice of the availability of the document will be sent to other interested persons, including those who participated in the first public hearing. The document will be available for review at the Municipal Clerk's office, Cherry Hill Department of Community Development, the Cherry Hill library, and online on the Township website. The draft consolidated or annual plan will be available for public comment for a minimum of **thirty (30) days** following the published notice. All comments and views will be considered, and a summary of these comments or views, and a summary of any comments or views not accepted and the reasons therefore, will be included in the final document submitted to HUD. During the comment period, opportunities must be provided for activities proposed to be added, deleted, or changed.

Public Hearing 2: Plan and Budget Review Hearing

Overview. A second public hearing will be held during, or after, the **thirty (30) day** comment period for the proposed 5-year Consolidated Plan (and/or the Annual Action plan, whichever is applicable) to review the Township's proposed Plan and Budget. Notice of the time, date and place of each public hearing shall be provided at least **ten (10) days** prior to the scheduled public hearing in accordance with the 'General Requirements for all Public Hearings below.'

Topics. The second public hearing will review the following matters:

- Review of proposals and comments from the program planning public hearing
- Proposed objectives and activities set forth in the proposed Plan
- Proposed use of CDBG funds set forth in the proposed Plan
- Proposed Budget
- Comments, suggestions and input in response to the proposed Plan
- Public input and comment on all aspects of the Township's CDBG program performance (see 'General Requirements for All Public Hearings' below)

Preparation of Final Plan. The proposed Plan and Budget will be available for review at the Municipal Clerk's office, Cherry Hill Department of Community Development, the Cherry Hill library, and online on the Township website. All comments and views will be considered, and a summary of these comments or views, and a summary of any comments or views not accepted and the reasons therefore, will be included in the final document submitted to HUD.

Resolution Adopting Final Plan. After both the second public hearing and the close of the comment period, the

Department of Community Development shall finalize the Plan and Budget, and refer it to Township Council for a Resolution adopting the Plan and Budget at a public meeting. Once approved by Township Council, the Plan will be submitted to the U.S. Department of Housing and Urban Development (HUD) and a copy of the Plan shall be posted on the Township website.

General Requirements for All Public Hearings

1. Notice of the time, date and place of each public hearing shall be published in a **non-legal** section of the Courier Post at least **ten (10) days** prior to the scheduled public hearing.
2. Notices of the time, date, and place of each public hearing shall be posted on the Township website at least **ten (10) days** prior to the scheduled public hearing.
3. Notices announcing each public hearing will be emailed to local public agencies and departments, such as the the Parks and Recreation Department, the Public Works Department, Senior Services, and the Comptroller's Office. Additionally, notices announcing the public hearing will be emailed to other interested parties and non-profit organizations, such as Affordable Rental Housing at Tavistock (ARHAT), the Cherry Hill Food Pantry, current and/or past sub-recipients, and other community-based and faith-based organizations.
4. Public hearings will be scheduled at times and locations convenient to potential and actual beneficiaries, and with accommodation for persons with disabilities. *The public hearing notice will state that non-English speaking persons and others needing special assistance to participate in the public hearing process should contact the Township to make the necessary accommodations.* The Township shall take reasonable steps to provide language assistance to ensure meaningful access to participation by non-English-speaking residents of the community.
5. Copies of notice and affidavits of publication from the newspaper shall be retained.
6. Minutes of public hearing, with list of attendees, shall be kept.
7. At all public hearings, citizens and citizen organizations will be given the opportunity to assess and comment on all aspects of the Township's CDBG performance. This assessment will include a determination as to whether objectives have been achieved.
8. In accordance with the 2020 Coronavirus Aid, Relief and Economic Security Act (CARES Act), in emergency circumstances, in-person public hearings are not required. The grantee will make a good faith effort to provide an opportunity for the public to participate using whatever means are available, including electronic communications and virtual meetings. Grantees may meet public hearing requirements with virtual public hearings if: 1) national/local health authorities recommend social distancing and limiting public gatherings for public health reasons; and 2) virtual hearings provide reasonable notification and access for citizens in accordance with the grantee's certifications, timely responses from local officials to all citizen questions and issues, and public access to all questions and responses.

CAPER – Annual Performance Report

The CAPER (Consolidated Annual Performance and Evaluation Report) is a tool used to evaluate accomplishments and actions taken during the previous program year. The CAPER report to HUD will include the following:

1. Progress towards addressing priorities, goals, and objectives outlined in Consolidated Plan
2. Progress of each CDBG activity
3. Financial report for each CDBG activity
4. The demographics of persons and households assisted

Additionally, all comments or views of citizens received in writing or orally at public hearings will be considered during the preparation of the annual performance report. 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 final performance report submitted to HUD.

Public Comment Period

Notice of the availability of the CAPER (Consolidated Annual Performance and Evaluation Report) for public review and comment will be published in the non-legal section of the *Courier Post*, posted on the Township website, and sent to local public agencies and other interested parties, including program participants. The document will be available for review at the Municipal Clerk's office, Cherry Hill Department of Community Development, the Cherry Hill library, and online on the Township website. The annual performance report will be available for public comment for a minimum of **fifteen (15) days** following the published notice. All comments and views will be considered, and a summary of these comments or views, and a summary of any comments or views not accepted and the reasons therefore, will be included in the final document submitted to HUD.

Amendments to the 5-Year CDBG Consolidated Plan or Annual Action Plan

There are times when the Township must amend its 5-Year CDBG Consolidated Plan or Annual Action Plan after the plans have already been approved. For example, such amendments may include changing the purpose, scope, location or beneficiary of an activity; to reallocate CDBG funds; to designate new activities, to change the use of CDBG funds from one eligible activity to another. While all amendments must be made public, it is substantial amendments that are subject to a citizen participation process, in accordance with the requirements herein.

A Substantial Amendment is a new Program Activity, cancellation of an approved activity, or a re-programming of funds greater than 35% of the total current Program Year Allocation PLUS the available Program Income. A minor amendment is a budget change less than or equal to 35 percent of the total CDBG budget PLUS the available Program Income, or a change in the location of activities already included in the consolidated or annual plan. Minor changes do not require a citizen participation process, i.e., public hearing or public comment.

Substantial Amendment: Public Comment Period

A proposed Substantial Amendment shall be available for review and public comment for a minimum of **thirty (30) days** following the published notice of availability. The notice will be published in the **non-legal** section of the *Courier Post*, posted on the Township website, and sent to local public agencies and other interested parties. The document will be available for review at the Municipal Clerk's office, Cherry Hill Department of Community Development, the Cherry Hill library, and online on the Township website. All comments and views will be considered, and a summary of these comments or views, and a summary of any comments or views not accepted and the reasons therefore, will be included in the final document submitted to HUD.

Substantial Amendment: Public Hearing

Additionally, a public hearing on the proposed Substantial Amendment will be held during, or after, the **thirty (30) day** comment period to review the proposed changes. Notice of the time, date and place of each public hearing shall be provided at least **ten (10) days** prior to the scheduled public hearing in accordance with the 'General Requirements for all Public Hearings below.' All comments and views will be considered, and a summary of these comments or views, and a summary of any comments or views not accepted and the reasons therefore, will be included in the final document submitted to HUD.

ADDITIONAL PROGRAM INFORMATION

Displacement and Relocation

The Township of Cherry Hill shall be committed to the minimization of displacement of persons in the conduct of its redevelopment efforts. If any dislocation takes place through government action, a relocation plan will be prepared to provide the necessary funding for moving, dislocation and rental assistance. Relocation benefits will be paid according to applicable state or federal regulations. If any persons are displaced from their rental property due to housing code violations, they will be assisted by the Township as required under the State of New Jersey Workable Relocation Assistance Program (WRAP), which provides for moving and dislocation costs, and a rental subsidy, if necessary. In the case of code violations, the Township will seek reimbursement of such moving, dislocation and rental assistance costs from the property owner of record. If no reimbursement is forthcoming, a lien will be placed on the subject property.

Citizen Participation Coordinator

The Community Development Deputy Director, or his/her designee, shall serve as the Citizen Participation Coordinator. He or she can be reached at Cherry Hill Township, Community Development Department, 820 Mercer Street, Room 202, Cherry Hill, NJ 08002. Phone: (856) 488-7870.

Technical Assistance

The Township will provide technical assistance to groups representative of persons of low and moderate income that request such assistance in developing proposals, subject to a limitation determined by the Township with respect to the resources available to the Township and the overall objectives of the CDBG program. Requests for technical assistance should be made to: CDBG Program, Cherry Hill Township, Department of Community Development 820 Mercer Street, Room 202, Cherry Hill, NJ 08002 (856) 488-7870

Availability of Information

The Township of Cherry Hill will make available, upon written request for a specific record, copies of program records and information concerning the CDBG program, to any person or organization, to the extent that such requests are consistent with consideration of personal privacy and obligations of confidentiality of HUD-assisted client information. Any Open Public Records Request (OPRA) may be submitted through the Township website at: <https://www.chnj.gov/376/Requesting-Records-Information-OPRA> or to the following office: Cherry Hill Township, Office of the Municipal Clerk, 820 Mercer Street, Room 105 Cherry Hill, NJ 08002

Complaints & Grievances

Complaints and grievances must be filed in writing with the Director of Community Development, 820 Mercer Street, Room 202, Cherry Hill, NJ 08002. Written answers to properly filed complaints and grievances will be provided within 15 working days, where practicable.