

**TOWN OF MANCHESTER
CITIZEN PARTICIPATION PLAN**

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

**Manchester Planning Department
Designated Block Grant Agency
Adopted: February 13, 2015**

I. INTRODUCTION

The Citizen Participation Plan (CPP) is intended to ensure all Manchester residents have a meaningful opportunity to participate in the development of the Consolidated Plan for Housing and Community Development, and each Annual Action Plan, and to comment on the plans. The Consolidated Plan is a five year plan required by the Department of Housing and Urban Development. It is the overall strategy for meeting the community's housing and non-housing community development needs, and must be adopted in order to receive federal Community Development Block Grant (CDBG) funds. The Consolidated Plan includes an Action Plan which specifies how CDBG funds will be used during a particular year and a new annual action plan is adopted each year. The CPP also meets the specific statutory requirements of the CDBG program. The Manchester Planning Department has been designated the community development agency and as such will be responsible for carrying out the CPP.

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 plan recognizes there are a number of planning processes going on in the community, and it attempts to incorporate this work into the development of the Consolidated Plan for the community.

The Planning Department will ensure the citizen participation requirements of the CDBG regulations are met and will incorporate any applicable planning activities being carried out in the community as part of that work. Some examples of ongoing planning processes which take place outside of the immediate requirements or purview of the CDBG program are the Manchester Planning and Zoning Commission's responsibility for developing a Plan of Conservation and Development; the Manchester Housing Authority's planning requirements around the capital improvements grant program and agency plan; the work of the Manchester Housing Commission on identifying affordable housing needs and opportunities in the community; the Manchester Economic Development Commission's role in encouraging the expansion and retention of the local

employment base; the Greater Manchester Chamber of Commerce and its efforts to establish policies which benefit the business community and the residents; the Manchester Community Services Council, a consortium of public and nonprofit agencies providing a wide range of human and social services in the community; and the local Continuum of Care, a voluntary collaborative of area nonprofits and Town department representatives established to provide the most effective assistance to their clientele.

The Consolidated Plan will also incorporate applicable work of the Capitol Region Council of Governments, Partnership for Strong Communities and Capital Workforce Partners, a regional workforce development agency. The work of other regional organizations, such as the Balance of State Continuum of Care, will also be considered when drafting the Consolidated Plan.

The CPP is available on the Town's web site at www.townofmanchester.org via the Planning Department webpages.

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

1. The department will publish in a newspaper of wide general circulation in Manchester a notice of funds available and a notice of public hearings on housing and community development needs.

This public notice will identify the time, date and place of the public hearings on housing and community development needs. The notice will also identify the amount of CDBG funds expected to be available for the grant year and the range of activities that may be undertaken with those funds.

2. The department shall directly notify public, governmental and nonprofit agencies or groups which may conduct activities which benefit low and moderate income persons, minorities, non-English speaking persons and persons with disabilities of the availability of funds and the public hearing on housing and community development

needs. This notification will include application materials, submission deadlines and will solicit funding proposals.

Agencies to be notified shall include but not be limited to:

- The Manchester Housing Authority and its Resident Advisory Board
- Manchester Area Conference of Churches, Inc.
- Town of Manchester Human Services Department
- Town of Manchester Park and Recreation Department
- Town of Manchester Public Works Department
- Town of Manchester Planning Department
- Manchester Commission on Human Relations, Elderly Services and People with Disabilities
- Community Health Resources (CHR)
- Manchester Police Activities League
- Manchester School Readiness Council
- Manchester Continuum of Care Working Group
- Manchester Community Services Council
- Funding sub-recipients from the current CDBG program year

3. At the public hearings the department will explain the purpose of the CDBG program and eligible activities. Testimony on housing and non-housing community development needs and suggestions on specific activities to be carried out in the Annual Action Plan will be solicited and considered. At this hearing the planning department will report on CDBG program performance and hear comments on that performance.
4. The department shall incorporate into the Consolidated Plan and Action Plan process all relevant information gathered through the department's other planning activities, including the Housing Commission, Economic Development Commission and the Redevelopment Agency.

The department will develop other methods to solicit information and opinions on conditions and needs in neighborhoods targeted with CDBG funds. These methods may

include development of a Facebook page or the use of other social media to integrate the opinions of residents who may not be willing or able to attend meetings.

5. The department will notify the Manchester Housing Authority (MHA) of the time and place of public meetings to encourage participation among its residents. Flyers will be provided to staff for posting at MHA properties to notify residents of public hearings.
6. To foster inter-jurisdictional consultation during development of the Consolidated Plan, the department will solicit opinions and gather information on housing and non-housing community development needs from local boards and commissions as appropriate.
7. Upon completion of the public hearing process, the Department will compile a summary of all suggestions gathered at public hearings and any written comments received. A workshop will be scheduled with the Town Board of Directors to review the information and determine if the Board has any project ideas to suggest developing into applications. In lieu of a workshop, the Department may issue a memo to the Board of Directors to serve the same purpose. No new project proposals shall be considered after this workshop except for applications submitted by the deadline.
8. The department shall, to the degree possible given staff resources, provide technical assistance 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.
9. The Town shall publish in a newspaper of wide general circulation a summary of the proposed Consolidated Plan and the Action Plan, including:
 - the statement of community development objectives;
 - the activities proposed to be undertaken with CDBG funds;

- the estimated amount of those funds proposed to be used for activities that would benefit low and moderate income persons;
- contents and purpose of the Consolidated Plan; and,
- list of locations where the entire proposed plan can be examined.

10. Copies of the proposed Consolidated Plan, Action Plan and Consolidated Annual Performance and Evaluation Report (CAPER) will be made available for public review at both branches of the Manchester public library system, the planning department and the citizen service center. A reasonable number of free copies of the plans will be given to citizens and groups upon request.

In years subsequent to the adoption of a full Consolidated Plan, the proposed Annual Action Plan will be made available in the same manner as the full Consolidated Plan except that the comment period for the Annual Action Plan and the CAPER will be 15 days.

11. A comment period of not less than 30 days from the publication of the Consolidated Plan summary will be provided for citizens to review it and submit comments either at public hearings or in writing to the department.
12. The department will hold at least two public hearings on the Consolidated Plan and Action Plan. One will be scheduled before the Consolidated Plan and Action Plan are drafted and one will be held to receive comments on the draft Consolidated Plan and Action Plan. Notice of the hearings shall also inform interested parties where they can obtain and/or review a copy of the proposed Consolidated Plan and Action Plan prior to the public hearings.
13. After the public hearings on the proposed Consolidated Plan and Action Plan, the department shall compile a list of comments and views received and consider these before preparing its final Consolidated Plan and Action Plan. The proposed plans may be modified based on comments received. The Board of Directors may revise the proposed Annual Action Plan either by changing funding levels for individual projects or changing

the projects to be included in the Annual Action Plan. However, changes can only be made based on testimony received on applications developed during the above process.

14. The department shall make the final Consolidated Plan and Action Plan available to the public. These final documents will be submitted to the town Board of Directors for approval.

III. RESPONSE TO COMPLAINTS AND AVAILABILITY OF INFORMATION

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.

Copies of the draft and final versions of the Consolidated Plan and annual Action Plans; Citizen Participation Plan; substantial amendments; and performance reports will be made available to the public at the Manchester public libraries, the planning department and Citizen Service Center. The Manchester public libraries will be responsible for providing these documents in forms accessible to persons with disabilities upon request.

Any written comments or grievances regarding the CDBG program in general or a particular CDBG funded activity should be sent to the CDBG Program Manager and Director of Planning in the planning department. The department shall respond in writing to all written complaints within 15 business days of its receipt of that correspondence. A summary of comments on the Consolidated Plan, the Annual Action Plan and the Annual Performance Report will be provided to HUD.

IV. 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 these residents will have an opportunity to comment. It may be altered by the agency in response to changes in program requirements from HUD or to otherwise make the process more effective.

The department may add to the list of groups or agencies to be notified of funds available and from which to solicit comments on community development and housing needs in Manchester.

V. TIMING AND NOTICE REQUIREMENTS

The specific times and dates of notice requirements and the schedule of events leading up to the final Consolidated Plan and Action Plan will vary according to the calendar year and the program year being used by the town for the CDBG program.

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 two days before any public hearing or meeting.

Public hearings will be held in an accessible building at a location convenient to potential and actual beneficiaries to promote the broadest possible attendance.

Meetings will be open to the general public. Notice of public hearings will be directed to residents, local businesses, and agencies working in the target neighborhoods and may include direct mail, flyers posted in community facilities and/or display advertising in local newspapers. Meetings may be held on weekdays or weekend days, and at various times of day, to encourage participation as appropriate.

VI. NON-ENGLISH SPEAKING RESIDENTS

When it is determined that an activity will impact a significant number of non-English speaking residents or that a significant number of non-English speaking residents are expected to attend a public hearing, appropriate efforts will be made to provide relevant information in writing or provide for a translator at public meetings.

VII. SUBSTANTIAL AMENDMENT TO THE CONSOLIDATED PLAN OR A FUNDED ACTIVITY OR PROJECT IN AN ANNUAL ACTION PLAN

A modification in any planned or funded activity that meets one or more of the following conditions will require an amendment to the Action Plan and Consolidated Plan:

BUDGET - When the town transfers more than 25% of the funds in any approved activity or project to another activity or project in the Action Plan, except that if a project or line item activity is complete. If complete, surplus funds for that project or line item can be transferred to another previously approved activity or line item regardless of the percentage of the original project or activity amount.

PURPOSE and SCOPE - When a modification to a project or activity in the Action Plan would result in a change in the national objective under which the project or activity was qualified or a change in the type of eligible activity.

LOCATION - when the physical location of a capital project or physical activity in the Action Plan is moved out of the designated service area, targeted geographic area, or specific location. The location of public service activities can change as long as it is still located within the designated service area.

BENEFICIARIES - when the number of low/moderate individuals served by a project or activity in the Action Plan no longer constitutes the minimum beneficiary threshold for those served either on an area basis as established by HUD, or at least 51% of those served on a limited clientele basis, or when a modification of the project or activity results in the exclusion of the original target population.

Notice of a hearing to receive comment on a proposal to substantially amend the Consolidated Plan or a funded activity or project will follow the requirements in V. Timing and Notice Requirements. A comment period of at least 30 days will be provided for citizens to review the substantial amendment and submit comments either at a public hearing or in writing to the department.

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 that 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.