

Cherry Hill Township

Community Development

Block Grant (CDBG)

Program

Citizen Participation Plan



Amended as of May 2025

CITIZENS PARTICPATION PLAN

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Township of Cherry Hill
Citizen Participation Plan
Community Development Block Grant (CDBG) Program
Dated: 4/10/2025

1. INTRODUCTION

This document sets forth the Township of Cherry Hill's policies and procedures for citizen participation related to the development, implementation and amendment of the Consolidated Plan (Con Plan), Annual Action Plans (AAP), and the Consolidated Annual Performance and Evaluation Report (CAPER). This Citizen Participation Plan has been revised in accordance with guidelines established by the US Department of Housing & Urban Development (HUD) in 24 CFR 91.105 and 91.505, as well as with recently updated 24 CFR Part 58 regulation for environmental reviews. This Citizen Participation Plan (CPP) shall be reviewed at least every five years during the planning process of the Five-year Consolidated Plan.

2. PURPOSE

The primary goal of a Citizen Participation Plan is to provide citizens an opportunity to participate in a role in the planning, implementation, and assessment of the federally funded programs and projects.

3. DEVELOPMENT OF CON PLANS AND ANNUAL ACTION PLANS

A. PUBLIC PARTICIPATION

Participation of all Cherry Hill residents and stakeholders is encouraged, especially low-and moderate-income persons, non-English speaking persons, persons with disabilities, residents of predominantly low-and moderate-income neighborhoods, residents of areas where CDBG funds are proposed to be used, Continuums of Care, businesses and developers, public, private and non-profit organizations (philanthropic organizations, community-based and faith-based organizations). This will be accomplished through outreach, consultation (stakeholder meetings/interviews), informal resident meetings, and formal public participation (public hearings and public comment periods). Additional consultation is required during the development of the Five-year Consolidated Plan, which could include methods such as community surveys and focus groups/workshops with stakeholders and interested parties. Public input is essential in the following areas of the CDBG process:

- Identification of housing and community development needs;
- Proposed Strategies & Actions for Affirmatively Furthering Fair Housing;
- Development of the Five-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)).

B. PUBLIC HEARINGS

HUD requires a minimum of two (2) public hearings for each program year, held at different stages of the planning and reporting process. Currently, the Township has committed to holding three (3) hearings during a typical program year, two (2) in the planning phase and one (1) in the reporting phase. Additional public hearings may occur, if desired. **Notice and requirements for all public hearings shall be held in accordance with the 'General Requirements for all Public Hearings' set forth in Section 7 of this Plan.**

1. PUBLIC HEARING #1

The first public hearing shall be held to gather input and ideas for the development of the Five-year CDBG Consolidated Plan and each subsequent Annual Action plan (one each year for five years). The first public hearing shall occur before any proposed consolidated or annual plan is published for comment and shall include the following topics:

- Total amount of anticipated CDBG Grant Funds available
- CDBG program National Objectives
- CDBG program Eligible Activities and targeted populations
- Public input on community development and housing needs, particularly of low- and moderate-income residents and targeted populations
- Public input on strategies and actions to affirmatively further fair housing (when preparing an Assessment of Fair Housing as part of Consolidated Plan)
- Review of previous program year(s) use of CDBG funds
- Public input on proposed use of CDBG funds
- Public comment on CDBG program performance

2. PUBLIC HEARING #2

A second public hearing will be held after the proposed document is drafted. It shall be held **during, or after, the thirty (30) day comment period.** It shall include the following topics:

- Review of proposals and comments from any prior public hearings
- Review of Goals and Objectives
- Proposed Budget, including amount of grant funds and program income expected to be received
- Projects and/or activities proposed to be undertaken, including the estimated amount that will benefit persons of low-and -moderate income
- Comments, suggestions, and input in response to the proposed Plan
- Public input and comment on all aspects of the Township's CDBG program performance

C. PUBLIC COMMENT PERIOD

Notice of the availability of the document will be published as a display ad in the non-legal section of the official newspaper of the Township (currently the *Courier Post*), posted on the Township website, at the Municipal Clerk's Office, and at the Cherry Hill library prior to its availability. Also, notice of the availability

of the document will be sent to the Camden County Department of Community Development, the Township Public Works Department, the Township Parks and Recreation Department, Senior Services, Controller's Office, Affordable Rental Housing at Tavistock (ARHAT), and any persons 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 Public Library, and online on the Township website.

The draft Consolidated or Annual Action Plans will be available for public comment for a minimum of **thirty (30) days** as detailed in 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.

D. FINALIZATION AND ADOPTION OF DOCUMENTS

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) in the Integrated Disbursement and Information System (IDIS) and a copy of the Plan shall be posted on the Township website.

4. PLAN AMENDMENTS

There are times when the Township must amend its Five-Year CDBG Consolidated Plan or Annual Action Plan after the plans have already been approved. Amendments to approved plans are required whenever the Township makes one of the following decisions:

- (1) to make a change in its allocation priorities or a change in the method in the distribution of funds;
- (2) to carry out a project using funds from any program covered by the consolidation plan including program income, reimbursements, repayment, recaptures, or reallocations from HUD), not previously described in the action plan; or
- (3) to change the purpose, scope, location, or beneficiaries of an activity.

A. MINOR AMENDMENTS

A minor amendment is an amendment that is not included in the definition of a Substantial Amendment. Minor amendments do not require a citizen participation process, i.e., public hearing or public comment. However, they do require adoption by Township Council and must be entered into HUD's Integrated Disbursement and Information System (IDIS).

B. SUBSTANTIAL AMENDMENTS

Substantial Amendments require a public hearing, a public comment period, adoption by Township Council, plan amendment submission to the U.S. Department of Housing and Urban Development (HUD) in the Integrated Disbursement and Information System (IDIS). A Substantial Amendment is an amendment that consists of any of the following:

- (1) The addition of a new Project, or
- (2) The cancellation of an approved Project or Activity; or
- (3) The re-programming of funds between one eligible Project or Activity to another in an amount greater than 35% of CDBG resources for the applicable program year(s), as set forth in AP-15 Expected Resources, as amended. (i.e., Entitlement allocation PLUS Program Income PLUS Prior Year Resources).¹

For these purposes, a Project is a broad category specifically listed in the Action Plan as a Project in AP-35;² a Project consists of one or more Activities. The addition of an eligible Activity is not considered a Substantial Amendment. The allocation of new Program Income received to an existing approved Project or Activity is not considered a Substantial Amendment.

1. 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 as a display ad in the non-legal section of the Official Newspaper of the Township (currently *Courier Post*), posted on the Township website, and sent to the Camden County Department of Community Development, the Township Public Works Department, the Township Parks and Recreation Department, Senior Services, Controller's Office, Affordable Rental Housing at Tavistock (ARHAT), and other recent sub-recipients. The document will be available for review at the Municipal Clerk's office, Cherry Hill Department of Community Development, the Cherry Hill Public 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.

2. PUBLIC HEARING

Additionally, a public hearing on the proposed Substantial Amendment will be held during, or after, the

¹ Only the pertinent program year(s) are taken into consideration when doing the calculation. In an instance where both the receiving program year and the originating program year are affected, both program years shall be reviewed.

² In a hypothetical example where the 2025 Housing Rehabilitation 'Project' consists of a 2025 Home Improvement Program (HIP) Activity and a 2025 Senior Home Repair Program (Handy Helper) Activity, a reprogramming of funds from the 2025 Home Improvement Program (HIP) Activity to the 2025 Senior Home Repair Program (Handy Helper) Activity would not be a Substantial Amendment if the amount was less than 35% of CDBG resources in the 2025 Program Year.

thirty (30) day comment period to review the proposed changes. Notice of the scheduled public hearing shall be in accordance with the 'General Requirements for all Public Hearings' set forth in Section 7 of this Plan.

5. CONSOLIDATED ANNUAL PERFORMANCE REPORT (CAPER)

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:

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

A. PREPARATION OF DRAFT REPORT

The Department of Community Development shall prepare a Draft Consolidated Annual Performance and Evaluation Report (CAPER). The report will be available for public review prior to the public hearing as described below.

B. PUBLIC HEARING #3

This public hearing shall be held to share program performance information on the Township's CDBG Program with the community. A presentation will be made reflecting the information reporting in the CAPER annual report. Notice of the scheduled public hearing shall be in accordance with the 'General Requirements for all Public Hearings' set forth in Section 7 of this Plan.

This public hearing will review the following matters:

- 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 and comment on all aspects of the Township's CDBG program performance (see general requirements below)

C. PUBLIC COMMENT PERIOD

Notice of the availability of the CAPER (Consolidated Annual Performance and Evaluation Report) for public review and comment will be published as a display ad in the non-legal section of the Official Township Newspaper (currently the *Courier Post*), posted on the Township website, and sent to local public agencies and other interested parties, including program participants. The CAPER will be available for public comment for a minimum of **fifteen (15) days** as detailed in the published notice. 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. During the comment period, opportunities must be provided for information proposed to be added, deleted, or changed.

6. ENVIRONMENTAL REVIEWS OF PLANNED ACTIVITIES

The updated 24 CFR Part 58 regulation allows grantees to utilize online publication of Notices of Intent to Request Release of Funds (NOI-RROF) and Findings of No Significant Impact (FONSI) starting May 23, 2024. In accordance with HUD guidance, the Township will post these notices on its website in the same manner as all HUD programs and plans, as well as any sites where the Township displays notices on a regular basis. The Township will maintain proof of publication and notice to the public. For online publications, required documentation may include: a print to PDF of the web hosting that includes the website address and date of printing; certification from the Certifying Officer or other official to include the dates of publication and website address along with a copy of the publication made; or other like affidavit of publication that includes the notice, date of the notice, and website address where it was published. This proof of publication will need to be provided with the Form 7015.15 Requests for Release of Funds submitted to HUD.

7. GENERAL PROVISIONS

A. GENERAL REQUIREMENTS FOR ALL PUBLIC HEARINGS

1. Notice of the time, date and place of the public hearings shall be provided **at least ten (10) days prior to the scheduled public hearing as a display ad** in the non-legal section of the official newspaper of the Township (currently the *Courier Post*) and shall be posted on the Township website, at the Clerk's office, and at the Cherry Hill library. Additionally, notice of public hearings will be emailed to the Camden County Department of Community Development, the Township Recreation Department, Township Public Works Department, Senior Services, Controller's Office, Affordable Rental Housing at Tavistock (ARHAT), and other recent sub-recipients.
2. Public hearings will be scheduled at times and locations convenient to potential and actual beneficiaries, and with accommodation for persons with disabilities.
3. Public hearings shall be held with accommodation for persons with disabilities. They will be held in facilities that are physically accessible to individuals with disabilities.
4. Public hearing notices 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. It will be stated in English and other languages required in the Language Assistance Plan (LAP). As of the November 2023 LAP, these languages are Spanish and

Chinese.

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. All comments and views received in writing, or orally at the public hearings, 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.
8. 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.
9. Virtual only public hearings do not meet the minimum regulatory requirements, but can be used in conjunction with in person hearings, unless there is a declared emergency. 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.

B. 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.

C. ASSESSMENT OF LANGUAGE NEEDS

The Township of Cherry Hill Community Development Department has in place a Language Assistance Plan (LAP) for identifying the need for translation of notices and other vital documents, which is available on the Township website. As of November 2023, CDBG Public notices and vital documents currently utilize translations in Spanish and Chinese. The Language Access Plan, as amended, shall continue to serve as

the Township's procedures for assessing its language needs and identifies any need for translation of notices and other vital documents.

D. ACCESS FOR PERSONS WITH DISABILITIES

Access will be provided at all stages of the planning process for those with disabilities. Specifically, all public hearings will be held in accessible locations and shall be held with accommodation for persons with disabilities. Informal meetings will be held in facilities that are physically accessible to individuals with disabilities, or if that is not possible, the information will be provided through alternative methods that allow for the most integration possible.

E. 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.

F. 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

G. 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

H. 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.