

**CHARTER TOWNSHIP OF WATERFORD**  
**COMMUNITY DEVELOPMENT BLOCK GRANT**  
**CITIZEN PARTICIPATION PLAN**  
(Implemented to comply with 24 CFR 91.100 & 10)

**INTRODUCTION**

The following represents the official Community Development Block Grant (CDBG) citizen participation plan for Waterford Township's CDBG Program. This participation plan will apply to the preparation of the Township's CDBG planning and reporting components as well as the implementation of CDBG-funded projects. This participation plan is designed to ensure that all citizens, non profit organizations, neighborhood groups, the business community and other interested parties are given adequate notice and an opportunity to actively participate in, review, be heard and comment upon all proposals relating to the CDBG Program.

This participation plan is designed to provide for and encourage participation by extremely low to moderate-income residents, minorities, non-English speaking peoples, persons with mobility, visual or hearing impairments or any other physical limitation. The Township will make every effort to reach out to the community and take special actions as necessary in order to ensure the active participation of all stakeholders in the development process.

The Township will also be open to exploring the adoption of alternative public notification and involvement techniques, as well as adopting quantitative ways to measure efforts where funding permits, that encourage citizen participation and the review of program performance.

**CREATION OF THE CITIZEN PARTICIPATION PLAN**

**Plan Consultation**

- During preparation of the consolidated plan other public and private agencies that provide assisted housing, health services, and social and fair housing services (including those focusing on services to children, elderly persons, persons with disabilities, persons with HIV/AIDS and their families, homeless persons) will be contacted and consulted.
- When preparing the portion of the consolidated plan describing the jurisdiction's homeless strategy, the Township shall consult with Oakland County to determine what resources are available to address the needs of any persons that are chronically homeless.
- When preparing the consolidated plan's section concerning lead-based paint hazards, the Township shall consult with state or local health and child welfare agencies and examine existing data related to lead-based paint hazards and poisonings, including health department data.
- When preparing the description of priority nonhousing community development needs, the Township shall notify and work with Oakland County and adjacent communities.
- The Township will also participate with Oakland County and adjacent communities when planning for problems and solutions that go beyond a single jurisdiction is needed.

**Plan Comment Period**

- A public hearing before the Planning Commission shall be held during the development of the consolidated plan to discuss and accept public comment on need priorities.
- The Township will provide citizens with a reasonable opportunity to comment on the original consolidated plan and on substantial amendments to the consolidated plan, and must make the consolidated plan public. The consolidated plan shall be in a format accessible to persons with disabilities, upon request.
- An announcement of the proposed consolidated plan shall be posted on the Township website and published in the Oakland Press fifteen days prior to the public hearing.

## **Proposed Consolidated Plan Review**

- The Township shall publish the proposed consolidated plan in a manner that affords citizens, public agencies, and other interested parties a reasonable opportunity to examine its contents and to submit comments.
- Information provided to the public shall include the amount of assistance the Township expects to receive (including grant funds and program income) and the range of activities that may be undertaken, including the estimated amount that will benefit persons of low- and moderate-income.
- An announcement of the proposed consolidated plan shall be published in a newspaper of local circulation fifteen days prior to the public hearing.
- A public hearing before the Planning Commission shall be held during the development of the consolidated plan to discuss and accept public comment on need priorities.
- After the public hearing, during non-emergency scenarios there shall be a thirty day period to receive comments from citizens on the proposed consolidated plan.

## **Consolidated Plan Adoption**

- A public hearing shall be held before the Township Board for consideration of consolidated plan adoption.
- An announcement of adoption of the consolidated plan shall be published in the Oakland Press fifteen days prior to the public hearing.
- After the public hearing, there shall be a fifteen day period to receive comments from citizens on the adopted consolidated plan.
- The Township will consider any comments or views of citizens received in writing, or orally at the public hearings, in preparing the final consolidated plan. A summary of all public comments or views, and a summary of any comments or views not accepted and the reasons therefore, shall be attached to the final consolidated plan.

## **Consolidated Plan Amendments**

- The addition or deletion of new needs shall constitute a substantial amendment to the consolidated plan. The use of any grant funds in an individual annual action plan must be for a priority need identified in the consolidated plan.
- The Township shall advertise in newspapers of local circulation and provide notice on the Township's website for a period not less than thirty days, to receive written comments on the substantial amendment prior to adoption by the Township Board during a public hearing.
- The Township shall consider any comments or views of citizens received in writing, or orally at public hearings, if any, in preparing the substantial amendment of the consolidated plan. A summary of these comments or views, and a summary of any comments or views not accepted and the reasons therefore, shall be attached to the substantial amendment of the consolidated plan.
- In the event of a nationally or locally declared emergency, HUD may provide waivers and or alternative requirements relative to the citizen participation plan and public notification processes. In such events, Waterford Township will avail itself of any provided regarding the Consolidated Plan or necessary Consolidated Plan amendments that will help in expediting the delivery of assistance to the community.

## **Annual Action Plan**

- The Township shall provide not less than fifteen days public notice, to receive comments on the action plan which ideally is to be submitted to HUD annually at least forty-five days prior to the beginning of a new program year. The Township shall consider any comments or views of citizens received in writing, or orally at public hearings in preparing the action plan. A summary of these comments or views shall be attached to the annual action plan.
- The addition of a new project, or cancellation of a project approved as part of an annual action plan, shall be considered a substantial amendment to the annual action plan, which under non emergency

scenarios will require a public hearing with fifteen days public notice and adoption by the Township Board.

- A reduction or increase in funding of a project approved as part of an annual action plan shall be considered a minor amendment to the annual action plan. Reductions or increases exceeding fifty percent of the project amount approved as part of an annual action plan will require approval by the Township Supervisor.
- In the event of a nationally or locally declared emergency, HUD may provide waivers and or alternative requirements relative to the citizen participation plan and public notification processes. In such events, Waterford Township will avail itself of any provided regarding the Annual Action Plan submittal or necessary Annual Action Plan Amendments that will help in expediting the delivery of assistance to the community.

## **Consolidated Plan Annual Performance Report (CAPER)**

- The Township shall post notice of the availability of the draft report at all Township offices, including the Township Hall, the Township Library, the Township Parks and Recreation Department, the Department of Public Works, and the Waterford Senior Center. All comments on the performance report.
- The Township shall consider any comments or views of citizens received in writing, or orally at public hearings in preparing the performance report. A summary of these comments or views shall be incorporated into the final report that is to be submitted to HUD annually within ninety days of the end of the program year.
- In the occurrence of certain disasters, emergencies or other unanticipated events, Waterford Township may request extensions on the submission of the Consolidated Plan and Action Plan.

## **PROGRAM YEAR PUBLIC HEARINGS**

The Township shall provide at least two public hearings during each program year cycle and shall be designed so as to facilitate the obtaining of views of citizens, public agencies, non profit groups, neighborhood groups and other interested parties to respond to proposals and comment upon all of the various stages of the drafting and submission process.

The first public hearing of the year will be held during a regularly scheduled Township Board meeting during February, March, or April to consider and adopt the annual action plan. This public hearing shall also be televised on the government access channel of the local cable television system.

The second public hearing of the year will be held during a regularly scheduled Township Planning Commission meeting during September or October to provide Commissioners and the public with a review of program performance and to obtain citizens' views and to respond to proposals and questions. This public hearing shall also be televised on the government access channel of the local cable television system.

## **LANGUAGE ASSISTANCE**

The Township shall meet the needs of non-English speaking residents and the impaired during public hearings with prior notice. The Township shall, upon prior request, make arrangements for available translators and sign language interpreters to facilitate the full participation of members of the community in need of such services. The Township will obtain a person of appropriate bilingual skills when it has prior knowledge that a significant number of non-English speaking residents can be expected at a public hearing.

## **ACCESS TO MEETINGS**

The Township will at all times provide adequate, timely notice of all hearings and meetings relating to the CDBG Program. Such notice shall be designed in such a way as to give citizens the ability to attend local meetings and to freely comment upon all proposals for the CDBG Program and to participate meaningfully in the development process.

## **AVAILABILITY TO THE PUBLIC**

The consolidated plan as adopted, substantial amendments, the performance report, and the annual action plan will be available to the public. Digital copies of the consolidated plan, amendments, performance report, and the annual action plan, shall be available on the Township's website internet and made available to the public at no cost. Printed copies shall be available for review at the Township Hall offices.

## **ACCESS TO CDBG RECORDS**

Citizens of the community, neighborhood groups, non profit groups, public agencies and other interested parties, especially those most directly affected by the CDBG Program's activities, must have the opportunity to receive information, review and submit comments on any proposed submission concerning the amount of funds available, including the estimated amount proposed to benefit low to moderate income residents in order to more fully participate in the community and economic development planning process. In compliance with the Uniform Relocation Assistance and Real Property Act of 1970, as amended, such persons and groups shall also have access to information relative to any plan the Township may have for displacement of individuals and the plans for assistance that may be provided to those so displaced. Citizens and any interested party shall have access to records for at least five years after the close of any given fiscal year, as to that year.

## **TECHNICAL ASSISTANCE**

The Township will make technical assistance available when possible through CDBG program administration funds to groups that are representative of persons of low- and moderate-income and requesting such assistance in developing CDBG project funding proposals. The level and type of assistance will be determined by the Township and may include training in HUD CDBG procedures and regulations and the provision of documents and socio-economic data maintained by the department. The assistance in developing proposals will not include the provision of funds to the groups.

## **COMPLAINTS**

The Township shall respond to substantive written citizen complaint complaints from citizens related to the consolidated plan, amendments, and performance report, within fifteen working days, where practicable. If a response to a written complaint will take more time, then notice of this fact will be provided within fifteen working days and an estimate of the time to prepare the response shall be provided.

## **COMMITMENT TO COMPLY**

The Township shall follow this citizen participation plan during the creation and execution of the consolidated plan.

## **DISASTERS AND EMERGENCY EVENTS**

In the event of a nationally or locally declared disaster or emergency event, existing and new CDBG funding to address the disaster or emergency may become available to Waterford Township. To streamline the allocation process and reduce delays in allocating such funds, Waterford Township will pursue all available HUD notices, waivers, award letters or other HUD communication to utilize the funding in an expedited timeframe.

If necessary, a streamlined citizen participation process will be followed to facilitate substantial amendments to the Consolidated Plan and/or Annual Action Plan(s). These amendments may include funding new activities and/or the reprogramming of funds, including canceling activities as deemed necessary by the Township Board. Substantial amendments proposed under this section will be subject to a 5-day public comment period instead of a 30-day public comment period (otherwise required for substantial amendments).

Further, in the event of a nationally or locally declared disaster or emergency event, health officials may recommend social distancing and/or limited public gatherings for public health reasons, virtual or web-based hearings will be used in lieu of in-person hearings. If this format is used, accommodations for real-time responses, timely responses from local officials to all citizen questions and issues, public access to

all questions and response, and accommodations for persons with disabilities or limited English proficiency will be made to the greatest extent possible. On the day of the public hearing, comments may be submitted in writing or made orally during the hearing.