



TOWN OF ARLINGTON
DEPARTMENT OF PLANNING and
COMMUNITY DEVELOPMENT

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MEMORANDUM

To: Adam Chapdelaine, Town Manager
From: Mallory Sullivan, CDBG Administrator
CC: Jennifer Raitt, Director, DPCD
Date: December 10, 2020
RE: Amendment to CDBG Citizen Participation Plan

Background:

The Community Development Block Grant (CDBG) is a federal grant through the U.S. Department of Housing and Urban Development (HUD). The primary objective of CDBG is the development of viable communities by the provision of decent housing and a suitable living environment and expanding economic opportunities, principally for persons of low and moderate income. In order to define what is needed to develop a suitable living environment, HUD and the Town of Arlington request the input of the public during the process to determine priorities for the CDBG program and to select projects to be funded by CDBG.

The Town of Arlington became an entitlement jurisdiction in 1974 for the CDBG program. As an entitlement jurisdiction, the Town receives CDBG funds directly from HUD and administers the grant, including ensuring the funds are used according to the Code of Federal Regulations (CFR) and the associated plans, reports and certifications are completed on time and accurately.

Each entitlement jurisdiction must complete a Consolidated Plan at least once every five years (24 CFR § 91.15). The Consolidated Plan is a strategic plan that examines the housing and community development needs of a jurisdiction, sets priorities for HUD grant monies and establishes an action plan for meeting current and future needs. Each Consolidated Plan is also required to have a strategy for citizen participation in the Consolidated Planning process (24 CFR Part 91.105). The Town of Arlington works with the North Suburban HOME Consortium and their lead community the City of Malden to develop the 5-Year Consolidated Plan. The plan is in the process of being updated for program years 2020- 2025.

HUD requires an entitlement jurisdiction to submit an Annual Action Plan each year to receive the CDBG funding (24 CFR § 91.15). The Annual Action Plan serves as the Town's application to HUD for the following year's CDBG funding and includes the projects that the entitlement desires to fund. The Plan also outlines the tasks and objectives that will be accomplished during the program year and includes sections that describe the public participation process, how other resources will be leveraged, and how the Town plans to address barriers to affordable housing, fair housing and homelessness. The Select Board's CDBG Subcommittee helps to prepare the Annual Action Plan by reviewing annual CDBG applications from CDBG applicants (sub-recipients) and recommending CDBG appropriations. The Subcommittee prepares a report to Town Meeting and a vote of endorsement of the plan is requested. The Town's CDBG program year begins July 1st and ends June 30th.

At the end of each CDBG program year, the Town creates the Consolidated Annual Performance and Evaluation Report (CAPER), which reviews the progress the City has made in carrying out the priorities in the Consolidated Plan. The report includes a description of the resources made available, the investment of the resources, the distribution and location of investments, per 24 CFR § 91.520. This report must be submitted to HUD within 90 days of the end of the program year.

Purpose of the Plan:

The purpose of the Citizen Participation Plan is to set forth the policies and procedures by which the Town will encourage people to participate in the development of the aforementioned CDBG strategic plans and to inform the use of grant funds. The Town of Arlington will follow its Citizen Participation Plan, as long as the requirements for citizen participation do not restrict the responsibility or authority of the Town to develop and execute its Five-Year Consolidated Plan.

All of these plans and actions that occur throughout the course of the CDBG program year require public input. The Citizen Participation Plan helps to guide that process and provide the Town with feedback and recommendations as plans and actions move forward. The current Citizen Participation Plan was last amended in 1995; while the program and its requirements have not significantly changed the mechanisms for reaching and engaging people in the planning process have changed. This amended Citizen Participation Plan includes required HUD citizen participation plan updates and incorporates elements of the Town's existing communications policy.

We look forward to any feedback from the Board and request the Board's adoption of the Plan in order to continue with our ongoing CDBG planning and programming efforts.

Amendment to the Plan:

The Town of Arlington's CDBG Citizen Participation Plan was updated by DPCD and adopted by the Select Board on December 2, 2019. DPCD requests the Select Board's review and adoption of one amendment to the plan, following DPCD's use of the Citizen Participation Plan adopted in December 2019 during the current program year.

The amendment is to *Section D) Public Hearings, Point 1*: Strike the final sentence as follows:

The Town will hold a first hearing or hearings for the purpose of obtaining resident views regarding housing and community development needs and priorities for the coming year and to review program performance for the past year. ~~The hearing will be held at least 14 days prior to issuance of the draft Consolidated Plan or Annual Action Plan.~~

This change is also reflected in the attached Citizen Participation Plan file. The purpose of the amendment, which removes the requirement of a fourteen-day period between the initial public hearing and the issuance of the draft Annual Action Plan, is to decrease delays to the implementation of the final Annual Action Plan. This change will improve the CDBG program timeline's alignment with Arlington's Town Meeting schedule and HUD requirements, while facilitating a timely delivery of the plan, encouraging public participation, and providing notice to subrecipients of their funding status. The change adheres with statutory requirements and alters neither the length of public comment periods nor the number of public hearings.