

## **Town of Arlington Citizen Participation Plan**

Pursuant to the requirements of 24 CFR 91.105 and 24 CFR Part 5.158 the Town of Arlington hereby issues the following plan to provide for and encourage residents to participate in the development of the Town of Arlington's Consolidated Plan, Annual Action Plan, any substantial changes to the Consolidated Plan or Annual Action Plan, and the Consolidated Annual Performance and Evaluation Reports (CAPER). Adopted by the Select Board on December 2, 2019 and amended on May 4, 2020, this plan amends and supersedes the Town's existing Citizen Participation Plan, and is in compliance with Section 104(a)(3) of the Housing and Community Development Act of 1974.

### **A) Development of the Consolidated Plan and Action Plan**

At least 30-days prior to adopting a Consolidated Plan or an Annual Action Plan, the Town of Arlington will make available to residents, public agencies, and other interested parties a draft of these documents.

The draft Plan(s) will include information on the amount of assistance the jurisdiction expects to receive from the U.S. Department of Housing and Urban Development's (HUD) Community Development Block Grant (CDBG) and program income. It will also include descriptions of each program that the Town plans to undertake with such assistance and the estimated amount of such funds that will benefit very low income, low-income, and moderate-income persons and predominately low- and moderate-income neighborhoods and areas.

The Town will afford residents, public agencies and other interested parties an opportunity to examine and comment on the Draft Consolidated Plan or Draft Annual Action Plan through the following actions:

1. The Town will publish a Legal Notice in a daily newspaper of general circulation such as the Arlington Advocate, summarizing the draft Consolidated Plan or Annual Action Plan. The summary will describe the contents and purpose of the Consolidated Plan or Annual Action Plan and include the location where a copy of the draft Plans may be obtained. The notice will also specify the deadline and place to which comments should be submitted. Residents will be provided with a 30-day period to comment on the Plans. Along with the date, time, and location, this notice will include sufficient information about the subject of the hearing.
2. The Town will publish a notice of the opportunity for public comment on the draft Consolidated Plan or Annual Action Plan on the Town's Department of Planning and Community Development website: <https://www.arlingtonma.gov/departments/planning-community-development>. These Plans will also be posted on the website in a format

available for residents to examine or download. An advertised period of at least 30 days is required by the Citizen Participation Plan for the public to review and comment on the draft plan. A reasonable number of copies will be made available for review at DPCD.

3. The Town will ensure outreach to the Arlington Human Rights Commission, the Disability Commission, Diversity Task Group of Envision Arlington, and various Human Service organizations. Direct outreach to the Arlington Housing Authority will inform updates to the Public Housing Authority (PHA) plan and assist with overall coordination of efforts that benefit lower-income households in Arlington.
4. The Town will also establish and maintain an email list of interested residents, public agencies and other parties for the purpose of providing notice of the issuance of such Plans or of any public hearings related to the development of the Plans. The Town will send electronic notice of any such issuance to this email list not less than two weeks prior to said public hearings; and, the day that the Plan is issued and available on the Department's website.
5. The Town will consider any comments or views of residents received in writing, by email, or orally at the public hearings, in preparing the final Consolidated Plan or Annual Action Plan. A summary of these comments or views, and a summary of any comments or views not accepted and the Town's reasons therefore, shall be attached to the Consolidated Plan or Annual Action Plan submitted to HUD.
6. It is anticipated that the draft Consolidated Plan (every 5 years) and the Annual Action Plan will be issued on or about the second week of April of each year and the plans shall be adopted and submitted to HUD no later than the 15th of May of each year.
7. After HUD approves the Consolidated Plan and/or Annual Action Plan, the Town will make the document available to the public by posting the final Consolidated Plan or Action Plan on the Town's Department of Planning and Community Development website: <https://www.arlingtonma.gov/departments/planning-community-development>. The web posted document conforms to the Web Content Accessibility Guidelines for individuals with disabilities.

#### **B) Substantial Changes to the Consolidated Plan or Annual Action Plan**

The Town will use the following criteria for determining what changes in the jurisdiction's planned or actual activities constitute a Substantial Changes to the Consolidated Plan or Annual Action Plan:

- If the CDBG national objective for a planned program or activity is changed from low-mod benefit to any other category (except in the event of an urgent need pursuant to 570.203c), a Substantial Change will be issued.
- If the total amount of HUD's CDBG funding allocated to a program is increased or decreased by an amount that is more than 10% of the total CDBG funds budgeted for that project for that year, a Substantial Change will be issued unless either of the two exceptions applies.
- If CDBG funds are transferred from one eligible activity to another, a Substantial Change will be issued unless either of the two exceptions applies.

**Exception 1:** The budget change for the project is less than 10% of the source allocation.

*Example: The Town receives \$1 million in CDBG for the program year; 10% of that equals \$100,000. Project X has a CDBG budget of \$200,000. Midway through the program year, a budget change is proposed to decrease CDBG funding to Project X by \$50,000 (25%). Although the change is greater than 10% of Project X CPD budget, it is less than \$100,000 or 10% of the CDBG allocation for the year. A substantial change is not required.*

**Exception 2:** The budget change for the project is less than \$25,000.

Notice to HUD and the public will be provided on all non-substantial budget changes but would not require a 30-day public comment period for budget changes that do not exceed both thresholds.

The Town will afford residents, public agencies and other interested parties an opportunity to examine and comment on any such Substantial Changes through the following actions:

1. The Town will publish a Legal Notice in a daily newspaper of general circulation such as the Arlington Advocate, summarizing the Substantial Change. The summary will describe the contents and purpose of the Change to the Consolidated Plan or Action Plan and include the location where a copy of the draft Substantial Change may be obtained. The notice will also specify the deadline and place to which comments should be submitted. Residents will be provided with a 30-day period to comment on the Change.
2. The Town will post an electronic notice of proposed Substantial Change(s) to an email list of interested residents, public agencies and other parties and will publish said notice on the Town's Department of Planning and Community Development website: <https://www.arlingtonma.gov/departments/planning-community-development> The Town will also post the proposed Substantial Change(s) on the website in a format available for residents to examine or download. Residents will be able to return comments by email.
3. The Town will consider any comments or views of residents received in writing, or by email in preparing the final Substantial Change to the Consolidated Plan or Annual Action Plan for submission to HUD. A summary of these comments or views, and a summary of any

comments or views not accepted and the Town's reasons therefore, shall be attached to the Change submitted to HUD.

4. After the Substantial Change is approved by HUD, the Town will make the document available to the public by posting on the Town's Department of Planning and Community Development website: <https://www.arlingtonma.gov/departments/planning-community-development>. The web posted document conforms to the Web Content Accessibility Guidelines for individuals with disabilities.

### **C) Consolidated Annual Performance and Evaluation Reports (CAPER)**

At least 15-days prior to submitting to HUD any CAPER on the Annual Action Plan, the Town of Arlington will make available to residents, public agencies, and other interested parties a draft CAPER and an opportunity to examine and comment on the draft CAPER through the following actions:

1. The Town will publish a Legal Notice in a daily newspaper of general circulation such as the Arlington Advocate, summarizing the draft CAPER. The summary will describe the contents and purpose of the CAPER and include the location where a copy of the entire draft CAPER may be examined. The notice will also specify the deadline and place to which comments should be submitted. Residents will be provided with a 15-day period to comment on the report.
2. The Town will post an electronic copy of the CAPER on the Town's Department of Planning and Community Development website: <https://www.arlingtonma.gov/departments/planning-community-development>.
3. The Town will also post the CAPER on the website in a format available for residents to examine or download. Residents will be able to return comments by email.
4. The Town will consider any comments or views of residents received in writing by the specified deadline in preparing the final CAPER. A summary of these comments or views shall be attached to the CAPER submitted to HUD.
5. It is anticipated that the draft CAPER will be issued on or before the 15th of September of each year and the report shall be adopted and submitted to HUD no later than the 30th of September of each year.
6. The Town will make the document available to the public after HUD approves the CAPER by posting the CAPER on the Town's Department of Planning and Community Development website: <https://www.arlingtonma.gov/departments/planning-community-development>.

The web posted document conforms to the Web Content Accessibility Guidelines for individuals with disabilities.

#### **D) Public Hearings**

The Town will hold at least two formal public hearings each year to obtain residents' views and to respond to proposals and questions during different stages of the development of the Consolidated Plan or Annual Action Plan. Together, these hearings will address housing and community development needs, development of the proposed activities and review of program performance.

1. 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.
2. The Town will hold a second hearing or hearings for the purpose of accepting resident views regarding the draft Consolidated Plan or Annual Action Plan. The hearing will be held during the 30-day comment period on the draft Plan(s). The draft Plan(s) will be available for review at least seven days before the scheduled hearing. The hearings will be advertised through a Legal Notice in the Arlington Advocate and posting on the Town's Department of Planning and Community Development website:  
<https://www.arlingtonma.gov/departments/planning-community-development>.
3. The hearings will be held on a weekday evening at a centrally located and handicapped accessible public place such as the Robbins Library, the Central School/Senior Center, or other such location.
4. Interpreter services in spoken languages other than English and sign interpreters for the hearing impaired will be provided upon advance request of at least ten (10) days prior to the scheduled hearing. The Town will seek to accommodate other language interpretation needs to the best of its ability, upon advance request.

#### **E) Access to Records**

The Town will provide residents, public agencies, and other interested parties with reasonable and timely access to information and records relating to the jurisdiction's Consolidated Plan and the jurisdiction use of assistance under programs covered by the Consolidated Plan during the preceding five years. Requests for such information follow the requirements of the Massachusetts Public Records Access Regulations as documented on the Town's Public Records Center website:  
<https://www.arlingtonma.gov/departments/town-manager/public-records-center>.

Via this website, a public records request may be submitted electronically or the form printed and mailed or delivered in-person to the address indicated.

In most cases, you will have the opportunity to inspect the records in the possession of the Town of Arlington during regular business hours or will receive copies of the records within 10 business days. The computation of time begins with the first business day following the date of transmission (electronic requests) or receipt of your request (mail or in-person requests). In certain cases, if the nature of the Public Records Request is particularly voluminous or of a highly sensitive nature, it may take longer than 10 business days to provide for an inspection or to transmit copies of the requested records. In these cases, you will receive a preliminary written response notifying you of the intention to provide records at an interval not to exceed 25 days from the initial request.

In most cases there will not be a fee to access public records. This is because there is no fee for the first two hours of time spent producing the requested records, and there is no cost associated with transmitting the records electronically via email, when feasible.

Detailed information regarding public record requests is available on the Town's Public Records Center website: <https://www.arlingtonma.gov/departments/town-manager/public-records-center>.

#### **F) Technical Assistance**

Upon written request, the Town will provide access to technical assistance to groups representative of low-and moderate-income residents that request such assistance in developing proposals for funding assistance under any of the programs covered by the Consolidated Plan. The Town may choose to provide such assistance with its own staff, with consultants under contract to the Town under any of its housing and community development programs or refer the group making the request to any of the organizations funded by the U.S. Department of Housing and Urban Development to provide such assistance. The assistance provided will not include the provision of funds to the groups.

#### **G) Complaints**

The Town has adopted the following procedures for handling complaints from residents related to the Consolidated Plan, Annual Action Plan, Substantial Changes, and Consolidated Annual Performance and Evaluation Reports:

- All such complaints are to be made in writing to the Department of Planning and Community Development, 730 Massachusetts Avenue, Arlington, MA 02476.
- The Director of Planning and Community Development will coordinate the preparation of a substantive written response to every written resident complaint within 15 working days of receipt of the complaint, if practicable. The response will include the name of a contact person to facilitate any additional follow-up regarding the complaint.

## **H) Language and Communications Access for Town Services**

The Town's Department of Planning and Community Development will satisfy other language and disability accommodation requests with reasonable notice for documents, hearings, classes, seminars and events. Interpretation and other accommodations will be provided upon advance request of at least ten (10) days prior to the scheduled event. The Town will seek to accommodate other language interpretation needs to the best of its ability, upon advance request.

## **I) Emergencies and Other Urgent Situations**

The Town of Arlington has the ability, pursuant to any waivers made available by HUD, to alter any of the requirements of this Citizen Participation Plan in the event of an emergency or other urgent situation.