



# CITIZEN PARTICIPATION PLAN (CPP)

Updated February 29, 2024

## Introduction

The following pages provide the Citizen Participation Plan (CPP) of the Township of Ewing. Questions should be directed to Ted Forst, Director of Community Affairs, [tforst@ewingnj.org](mailto:tforst@ewingnj.org), 609-883-1776. A translation in Spanish and other languages is available by sending an email to [ewinghud@gmail.com](mailto:ewinghud@gmail.com).

## Background Information

The Township of Ewing receives federal funding under the Community Development Block Grant (CDBG) Entitlement Program of the U.S. Department of Housing and Urban Development (HUD).

CDBG provides annual entitlement grants on a formula basis to the Township to develop viable communities. The grant funds may be used for a variety of community needs in order to provide a suitable living environment, decent housing and by expanding economic opportunities for low- and moderate-income persons.

In recent years, the township has received between \$200,000 and \$250,000 per year from HUD through the CDBG and the funds have been used to rehabilitate the township's two community centers which are used for programs that benefit particular groups of persons, at least 51 percent of whom are LMI persons. The Ewing Senior and Community Center (ESCC) is located at 999 Lower Ferry Road, Ewing, NJ. This facility was destroyed by fire in the fall of 2022. The Hollowbrook Community Center (HCC) is located at 320 Hollowbrook Dr., Ewing, NJ. *Because funds are limited, the rehabilitation of the centers has been determined by public comment and by township elected officials to be the way to serve the largest numbers of low/moderate income residents.*

Using CDBG funds, the township will:

- Engage citizens in the process of developing and monitoring a plan to address the needs of the low- and moderate-income community by holding public meetings to plan activities to rehabilitate the township's community centers.
- Create a five-year plan, annual action plans and annual reports, to implement the CDBG-funded program. The plans are prepared using a variety of methods, such as reviewing local and regional studies and plans, conducting a community survey, asking for public input, consulting with Mercer County as lead in the local consortium, and coordinating with local organizations. The plans may be amended as necessary to reflect changes or new information related to the needs of targeted groups and the various areas of Ewing. If there is a change in the amount of the HUD allocation, the township will not be required to create an amendment to these plans. If there is a substantial change in the use of the funds, such as a new activity that is not in the plans, an amendment will be needed.
- Report on the accomplishments annually through a Consolidated Annual Performance and Evaluation Report (CAPER).

**National Objective:** The activities meet the following National Objective: Provide benefits to Low and Moderate Income (LMI) Limited Clientele. The Township's primary eligible activity is Public Facilities/Rehabilitation of Public Facilities serving the following National Objective: Benefit to Low and Moderate Income (LMI) Persons, Limited Clientele. An added eligible activity as of October 1, 2023 is applying for a HUD Section 108 loan guarantee to be used to finance the reconstruction of the Ewing Senior and Community Center which was destroyed by fire in the Fall of 2022.

**Activities:**

- Will focus on the rehabilitation of public facilities designed to benefit the general population, at least 51 percent of whom are LMI persons.
- Will provide LMI residents of Ewing Township with a suitable living environment through the rehabilitation of the Hollowbrook Community Center and the Ewing Senior and Community Center.
- Will have a special focus on improving access to the facilities for persons with disabilities and older citizens. Improving access for persons with Limited English proficiency will also be a focus.
- Will Affirmatively Further Fair Housing (AFFH) through updates to the township's Analysis of Impediments to Fair Housing and through creating updated printed materials (brochures, posters, etc.) that promote fair housing choice.

- Will focus on the application of a HUD Section 108 loan guarantee to be used to finance the reconstruction of the Ewing Senior and Community Center which was destroyed by fire in the Fall of 2022.

**Expected outcomes:** The expected outcomes of these activities include:

- accessible, clean and safe public facilities where supportive services are available for seniors, adults, youth, children and families in need of childcare, nutrition and other community programs that serve primarily low/moderate income residents;
- improved access to public facilities and
- updated educational materials for fair housing efforts.

### **Ewing's Citizen Participation Plan (CPP)**

The following CPP will be implemented by the Township of Ewing 1) as part of the process of applying for a HUD Section 108 Loan Guarantee for the rebuilding of the ESCC; and 2) when creating its Five-Year Consolidated Plan, Annual Action Plan and annual CAPER report for using HUD funding in accordance with 24 CFR Part 91.

The Township of Ewing certifies that it is in full compliance and is following a detailed citizen participation plan that satisfies the requirements of Sec. 91.105.

The following CPP sets forth this jurisdiction's policies and procedures for citizen participation and for giving citizens timely notice of local meetings and reasonable and timely access to local meetings, information, and records relating to the township's proposed and actual use of CDBG funds and Section 108 guaranteed loan funds, including, but not limited to:

- The amount of guaranteed loan funds expected to be made available for the coming year for activities that will benefit low and moderate-income persons carried out with guaranteed loan funds will be \$1,082,965 for Program Year 2023.
- The range of activities that may be undertaken with guaranteed loan funds will be reconstruction of the ESCC.
- The proposed activities will not result in displacement of persons as a result of the proposed activities.

Technical assistance to groups representative of persons of low and moderate income that request assistance in developing proposals for the use of funds will be provided by the township's Department of Community Affairs upon request.

**Public Hearings.** The township will hold a minimum of two public hearings, each at a different stage of the program, for the purpose of obtaining the views of citizens and formulating or responding to proposals and questions and reporting on progress and accomplishments. One hearing per year will address community development and housing needs, the development of proposed activities, and proposed strategies to address Affirmatively Furthering Fair Housing. The second hearing per year will review program performance and accomplishments. At least one of these hearings will be held before submission of the Section 108 Loan Guarantee final application to obtain the views of citizens on community development and housing needs.

Notice of at least 15 days prior to each hearing will be provided. The township will meet the requirement for a hearing at times and locations convenient to potential and actual beneficiaries by: 1) holding hearings in public facilities with parking and accessibility and 2) by holding the hearings at times when the maximum number of beneficiaries can attend which is at 2pm and/or 6pm. A hybrid approach (e.g., in-person, by conference call, online) will be taken when needed to ensure the maximum number of beneficiaries can attend, as allowed by HUD. Accommodations for persons with disabilities and those with limited English proficiency will be made available.

**Public Notice/Outreach.** Since the Spanish-speaking and Asian community constitute over 5% of the population, Ewing will conduct outreach to non-English-speaking residents by:

- offering translation services at public hearings when requested at least 48 hours prior.
- providing plans and documents in other languages when requested.
- posting ads and public notices in other languages.
- posting public notices in newspapers utilized by the Spanish-speaking and Asian community
- mailing invitations to public hearings to community organizations, associations and houses of worship that serve the Spanish-speaking and Asian community
- posting fliers in multiple languages in public facilities
- providing meeting agendas in multiple languages

Ewing will provide affected citizens with reasonable advance notice of, and opportunity to comment on, proposed activities not previously included in an application and activities which are proposed to be deleted or substantially changed in terms of purpose, scope, location, or beneficiaries. The criteria the township will use to determine what constitutes a substantial

change for this purpose is as follows: if an activity is not included in an annual action plan, an amendment will be required. If the amount actually received from HUD differs from the projected amount, this will not be deemed to be a substantial change and an amendment to the plan will not be required.

Responding to citizens' complaints and grievances, including the procedures that citizens must follow when submitting complaints and grievances, are as follows: The township's policies and procedures will provide for timely written answers to written complaints and grievances within 15 working days of the receipt of the complaint, where practicable. The response will be provided by email or US mail to the complainant from the township's Director of Community Affairs.

Ewing will encourage citizen participation, particularly from low-and moderate-income persons who reside in slum or blighted areas, and other areas in which guaranteed loan funds are proposed to be used by:

- Sending invitations to hearings by US mail to houses of worship and community organizations that serve the LMI and LEP population.
- Ads in local newspapers and those that reach the LEP populations.
- Posting fliers in multiple languages in public areas such as the county libraries, the municipal complex, and community centers.

<b>Specific procedures re: Development of the Section 108 Loan Guarantee application</b>
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The CPP plan will be completed and publicly available before the final HUD Section 108 Loan Guarantee application is submitted to HUD.

Public hearings will be held at convenient times and locations convenient to potential and actual beneficiaries. These meetings will be held at the community centers and the Township Municipal Complex in order to maximize attendance and community participation. A hybrid approach (in-person and via zoom) will be taken to allow maximum participation. The Director of Community Affairs and/or designees will send invitations to the heads of local organizations asking for their input in person or in writing. All present will be offered the opportunity to speak. Minutes will be taken and public comments will be documented.

A 30-Public Comment period will follow public notification that the Environmental Review (ER) has been submitted to HUD. Public notification procedures for the ER will be the same those followed for the Annual Action Plan and other plans and reports.

**Specific procedures re: Development of the Five-Year Consolidated Plan, Annual Action Plans and CAPERs.**

**Consultation.** When preparing the Five-Year Consolidated Plan, the Township of Ewing will consult with other public and private agencies that provide housing, library services, health services, food distribution programs and social and fair housing services (including those focusing on services to children, elderly persons, persons with disabilities, and education).

**Hearings.** Two open meetings of local organizations and local residents will be held to facilitate a discussion about the needs of the low-and moderate-income community in Ewing, prior to the development of the first draft of the plan, as part of the process of creating of the Five-Year Consolidated Plan.

Hearings will be held at convenient times and locations convenient to potential and actual beneficiaries. These meetings will be held at the community centers and the Township Municipal Complex in order to maximize attendance and community participation. A hybrid approach (in-person and via zoom) will be taken to allow maximum participation. The Director of Community Affairs and/or designees will send invitations to the heads of local organizations asking for their input in person or in writing.

Recent accomplishments and possible allowable uses of the HUD funds will be presented, as well as data on the needs of the community from the US Census. The grant manager will prepare this information and present it.

This presentation will be followed by a discussion of the needs of the community and all present will be offered the opportunity to speak. Minutes will be taken and public comments will be documented.

**Public Notice.** The required public hearing to review the plan will be held in the spring. Ads will be placed in the Trenton Times, Americano Newspaper and News India Times to encourage attendance. Notice of the meeting will be posted it on the township's website. Flyers in English and Spanish will be posted in the library, in the Ewing Senior and Community Center, at the Hollowbrook Center and at the Municipal Complex. Invitations to the hearings will be sent by Email and US Mail to houses of worship, community organizations and business associations. Public comments will be included in the final version of the plan. Persons with disabilities will be accommodated by holding the meeting in the Municipal Complex and other facilities that are fully accessible.

A 30-Day Public Comment period will be required for all plans including but not limited to: the CAPER Report, the Annual Action Plan, the Five-Year Consolidated Plan and the Environmental Review.