



# CITIZEN PARTICIPATION PLAN 2025

**DRAFT**

Town of Hilton Head Island  
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## **STATEMENT OF PURPOSE:**

Pursuant to Section 91.105 (Citizen participation plan; local governments) of Title 24 of the Housing and Community Development Act of 1974, a jurisdiction participating in the Community Development Block Grant (CDBG) Entitlement Program is required to adopt a citizen participation plan that sets forth policies and procedures for citizen contribution in the development of any consolidated plan, subsequent amendment to the consolidated plan, and the performance report.

The CDBG Entitlement Program is a federally funded program provided by the U.S. Department of Housing and Urban Development (HUD) to the Town of Hilton Head Island to primarily benefit low and moderate income (LMI) citizens within the Town. The citizen participation plan must encourage participation by LMI residents living in areas designated by the jurisdiction as a revitalization area or in a slum and blighted area, and in areas where CDBG funds are proposed to be used, and by residents of predominantly low-to-moderate income neighborhoods, as defined by the jurisdiction. The Town will encourage persons with disabilities, non-English speaking persons, advocates for senior, disabled, illiterate, and the homeless to participate in the Town's development of its five-year Consolidated Plan and Annual Action Plan for use of CDBG funds. Efforts to reach these communities will include public meetings and online accessibility.

The CDBG program provides funding to carry out a wide-range of eligible community development activities directed toward public improvements and facilities, housing activities, economic development and public services for LMI persons. All grant-funded activities must meet one of three broad National Objectives:

- 1) Benefit low- and moderate-income persons
- 2) Aid in the prevention or elimination of slums or blight
- 3) Meet a need having a particular urgency

Since it is the primary intent of this program to benefit persons of low and moderate income, this plan has been designed to encourage and promote community involvement, particularly by persons of low and moderate income. The following provisions shall be adopted and implemented to encourage citizen participation.

## **ELEMENTS OF PLAN**

The Citizen Participation Plan (CP) shall be a written document developed by the Town of Hilton Head Island to promote and encourage citizen input in the CDBG Entitlement Program. The CP shall be reviewed annually in conjunction with the community's need assessment meeting which is an annual requirement for CDBG Entitlement Program eligibility. The review shall be conducted during a public meeting, held in accordance with the public meeting provisions of this plan and CDBG Entitlement Program requirements.

The CP shall be available at the Town of Hilton Head Island Town Hall during normal business hours and written comments will be given consideration at the time of the annual CP review. Additionally, public comment shall be accepted during the public meeting.

### ***Public Meetings***

At least two public meetings will be held during the CDBG Entitlement Program Consolidated Plan and Annual Action Plan development period and annually after that. One meeting will be held to identify the Town's community development and housing needs. During one or both public meetings the range of eligible project types funded through the CDBG Entitlement Program and the amount of funding available will be addressed. A public meeting for review and comment on the final draft of the CDBG Entitlement Program Consolidated and Annual Action Plans will be held with a minimum thirty-day public comment period. The Town shall consider all comments received and attach a comment summary to the final draft of the CDBG Entitlement Program Consolidated and Annual Action Plans.

Prior to the adoption of a consolidated plan, the Town will make available to residents, public agencies, and other interested parties information regarding the amount of assistance the jurisdiction expects to receive, including grant funds and program income. The range of activities and the associated estimated amount of benefit to persons of low-to-moderate income will be shared as well. In addition, HUD-provided data and any other supplemental information the Town plans to incorporate into its consolidated plan will be made available and may be a link on the Town's website.

In the case of substantial amendments to the Consolidated or Annual Action Plans, where activities are to be added, deleted, or substantially changed in terms of purpose, scope, location or beneficiaries, the Town will provide citizens with an opportunity for comment on such changes through a public meeting. A minimum of thirty days will be made available to receive public comments regarding any substantial amendments to the Plans, and a comment summary will be included with amended plans.

All public meetings concerning the Town's CDBG Entitlement Program shall be held at times and locations convenient to the Town's citizens, particularly those who are potential or actual beneficiaries. No public meeting shall be held before 5:00 p.m. on weekdays or 2 p.m. on Sundays, or be scheduled to begin after 8:30 p.m. The only exception to these time constraints shall be for regularly scheduled Town Council meetings. The location of public meetings shall be held in handicap accessible locations or assistance shall be provided to accommodate the special needs of the handicapped. In the event a public meeting will be held in a non-handicapped accessible location, special assistance shall be provided and notice of the availability of assistance shall be included in the public notice.

Where an estimated 10% or more of public meeting participants are expected to be non-English speaking residents, the Town will take reasonable measures to accommodate their needs. Official U.S. Census Bureau data for the proposed project area and for the Town as a whole will be analyzed to determine if this provision applies in a particular instance. In the event that such a determination is made, provisions shall be made to translate public documents and comments at all relevant public meetings into the native language of the majority of non-English speaking residents affected. Appropriate action will also be taken to accommodate the needs of persons with mobility, visual, or hearing impairments who wish to participate in the public comment process.

Consultations with non-profit organizations, public housing agencies, and other community organizations serving intended CDBG Entitlement Program beneficiaries shall be conducted during development of the Consolidated and Annual Action Plans. One or more meetings shall be conducted with such organizations to determine housing and community development needs, gaps in service, missing services, or services provided by organizations where Town participation will benefit low- and moderate-income citizens.

### ***Public Notice***

The Town of Hilton Head Island shall notify its citizens of public meetings with regard to the CDBG Entitlement Program through a minimum of two of the following methods:

1. Publishing notice in the Island Packet, a general circulation newspaper, at least seven days prior to all CDBG Entitlement Program public meetings. Such notices may be prominently advertised in an appropriate, legal, non-legal or non-classified, section of the newspaper.
2. Public notices identical in content may be posted at least seven days prior to all CDBG Entitlement Program public meetings at Town Hall, in several conspicuous locations open to the public.
3. Public notices identical in content may be posted at least seven days prior to all CDBG Entitlement Program public meetings on the Town of Hilton Head Island website.

4. Public notices identical in content may be electronically sent at least seven days prior to all CDBG Entitlement Program public meetings to Town of Hilton Head Island E-Subscription Service subscribers.
5. Notice of any public meetings may also be mailed at least seven days prior to all CDBG Entitlement Program public meetings to local community leaders and organizations, such as churches, and Property Owner's Associations.

The Town will maintain documentation of how public notices have been published and distributed.

### ***Emergency Declarations***

In response to the 2020 CARES Act related to the federal emergency declaration for COVID-19, which affects the public meetings and public notice sections of this CP, provisions will be made to allow flexibility related to the Town of Hilton Head Island's participation in the HUD Community Development Block Grant Entitlement Program for CDBG funds.

The Town of Hilton Head Island may expedite procedures to draft, propose, or amend the CP, Consolidated and Annual Action Plans. Expedited procedures include publishing or posting public meeting or public comment period notices in the Island Packet newspaper, or on the Town of Hilton Head Island website, or at Town Hall conspicuous location, or sending electronically via the Town of Hilton Head Island E-Subscription Service subscribers list at least two (2) days prior to all CDBG Entitlement Program public meetings or comment periods related to CDBG funding.

In-person public meetings are not required during emergency declarations. Program public meeting requirements may be met with virtual public engagement if: (1) national/local health authorities recommend social distancing and limiting public gatherings for public health reasons; and (2) virtual engagement provides reasonable notification and access for citizens in accordance with the Town's certifications, timely response to citizen questions and issues, and public access to all questions and responses.

The public comment period for review and comment on the final draft of the CDBG Entitlement Program CP, and Consolidated and Annual Action Plans will be allowed for no less than five (5) days.

### ***Technical Assistance***

The Town of Hilton Head Island shall provide technical assistance to individuals or groups representative of low- and moderate-income persons interested in submitting written proposals for consideration during the annual project review cycle. Assistance shall be provided in the form of education of groups or individuals as to the CDBG Entitlement Program, eligibility guidelines, and the range of activities that may be undertaken with such funds particularly in relation to identified community needs. The Town of Hilton Head Island will consider for funding any proposals developed by representatives of low- and moderate-income persons who follow all of the requirements for public participation. It shall be the sole prerogative of the Mayor and Town Council to determine which, if any, CDBG Entitlement Program proposals are funded.

### ***Minimizing Displacement***

In the expenditure of CDBG Entitlement Program funds, the Town of Hilton Head Island shall take measures to minimize displacement of low- and moderate-income families that may result from its activities. When this is unavoidable on a temporary or permanent basis, federal law (the “Uniform Act”) shall be followed. This may include payments to the displaced families to assist with relocation expenses.

### ***Performance Reports***

The Town is required to submit to HUD a Consolidated Annual Performance Report (CAPER) within ninety days of the completion of a program year. The Town may hold community meetings and perform surveys as alternative public involvement techniques and quantitative ways to measure efforts and program performance.

The CAPER is due annually on September 30<sup>th</sup>. A minimum comment period of fifteen days will be provided to citizens prior to submission of the annual CAPER. The Town shall consider all comments received and attach a comment summary to the CAPER submittal.

### ***Plan and Program Access***

The citizens of the Town of Hilton Head Island shall be afforded reasonable access to the Citizen Participation Plan, Consolidated Plan, Action Plan, and records that concern projects undertaken with CDBG Entitlement Program funds. Appointments to review these documents may be set up through the Town of Hilton Head Island Finance Department during normal working hours, Monday – Friday from 8:00am through 4:30pm. Every effort shall be made to conveniently accommodate all citizens’ requests for public information; however, the Town reserves the right to schedule appointments based upon workload of the Town staff.

Complaints or grievances concerning the Citizen Participation Plan, the CDBG Entitlement Program Consolidated Plan or the CDBG Annual Action Plan shall be submitted to the Town Manager at the following address:

Town of Hilton Head Island  
Office of the Town Manager  
1 Town Center Court  
Hilton Head Island, SC 29928

The Town shall prepare a written answer to all written complaints or grievances within 15 days where practical.