

## **Citizens Participation Plan for CDBG Activities**

The City of Cleveland Heights decided upon receipt of its first block grant funding to develop a citizen participation mechanism that would do more than provide the community with limited opportunities to participate in the Community Development Block Grant (CDBG) program. The City ensured active citizen participation in the program throughout the year by forming a Citizens Advisory Committee (CAC) for the purpose of providing the community with information on the CDBG program.

This citizen participation plan is established by the City of Cleveland Heights in accordance with the Housing and Community Development Act of 1974, as amended, and 24 CFR 91.105.

The purpose of the citizen participation plan is to provide for and encourage citizen participation, with particular emphasis on participation by persons of low- and moderate-income. The plan provides for participation of residents in low- and moderate-income neighborhoods as the areas for which proposals are to be made for use of federal funds.

### **I. CITY COUNCIL**

Cleveland Heights City Council is responsible for the final allocation of CDBG funds. CAC presents their recommendations for funding to the Council. All CAC members are invited to the meeting for their input regarding the decision-making process.

All meetings of City Council are open to the public and the public is invited to address Council prior to any action taken by Council. Meetings of City Council are published in accordance with the Charter of the City of Cleveland Heights.

### **II. CITIZENS ADVISORY COMMITTEE**

#### **A. Composition**

The City of Cleveland Heights' Citizens Advisory Committee (CAC) is composed of persons representing each neighborhood, as well as members-at-large. The CAC consists of 22 community citizens: 10 who represent and reside within the 10 neighborhood districts and 12 who represent the community at-large. The membership may consist of fewer than 22 members. Committee members are volunteers and are appointed by City Council for a term of not less than one year, and may serve successive terms. CAC is governed in accordance with the "Bylaws of the Citizens Advisory Committee."

CAC is charged with the responsibility of reviewing and researching Community Development needs and the Consolidated Plan of the City of Cleveland Heights. In this context, CAC analyzes the requests for funds in relation to the needs of the community and amount of funds available. CAC then makes recommendations to the Administration and City Council as to which programs should be funded and at what levels in any given year.

## B. Role of CAC

Through the CAC process, the City implements a portion of its responsibility to furnish citizens with information concerning:

1. The amount of funds expected to be available;
2. The range of activities that may be undertaken with these funds;
3. The estimated amount of funds proposed to be used to benefit LMI persons;
4. The proposed activities likely to result in displacement;
5. The level of assistance available to persons if they were to be displaced.

The role of the Citizens Advisory Committee can be described in the following manner:

1. To act as an advisory committee to City Council;
2. To review and evaluate requests for CDBG funding to determine the impact of the proposed projects on the neighborhoods and city;
3. To become familiar with CDBG requirements so that CAC members can make enlightened decisions about how entitlement funds are spent;
4. To participate in monitoring the implementation of the CDBG program;
5. To assist in the evaluation of the CDBG yearly application; and
6. To fulfill HUD's requirement of citizen participation.

## C. Meetings

The CAC generally meets the third Tuesday of each month at 7:30 p.m. as noted below. All meetings are held at Cleveland Heights City Hall and are open to the public. Notice of the time and place for their meetings and all Public Hearing is sent to the local newspaper and library a minimum of ten days before each meeting. They are also listed on the calendar on the City of Cleveland Heights website and government television station.

### 1. Regular Meetings

The CAC follows a yearly schedule with each month addressing a different component of the CDBG program. The following calendar is an example of CAC's yearly schedule:

January	<b>Public Meeting</b> Organizational meeting and review of previous program year
February	<b>Public Meeting</b> Nominating committee
March	<b>Public Meeting</b> Election of officers
April	<b>Public Meeting</b> Minority Business Enterprise report review

May	<b>Public Hearing</b> Review Goals & Objectives, determine needs for following year
June	<b>Public Meeting</b> Review of applications and timetables for following year
July	No meeting
August	<b>Two Public Hearings</b> Grant applicants presentations
September	<b>Two Public Meetings</b> Grant application deliberations and recommendations
October	<b>Public Hearing</b> Annual Plan Draft, Minority Business Enterprise report review
November	<b>Public Meeting</b> Final annual plan review
December	No meeting

At each meeting, any member of the public wishing to speak will be recognized and given five minutes to address the Committee. Extended time may be granted for public comments at the discretion of the chairperson or a majority of the members.

Minutes of the Citizens Advisory Committee are open to the public for inspection at the Cleveland Heights Department of Planning and Development at City Hall. Any person may receive the agenda or minutes of the CAC at the Department of Planning and Development.

## **2. Public Hearings**

A total of four Public Hearings are held each year, as noted above. The first is held in May to discuss Community Development needs. The two Public Hearings held in August are an opportunity for subrecipients to report to CAC on how they spent their CDBG funds and for agencies that wish to be considered for funding in the following year to present their proposals. The final Public Hearing, held in October, is to hear citizen comments on the funding proposals received. Special advertisements are run in the local newspaper for all public hearings. They are also listed on the calendar on the City of Cleveland Heights website and government television station.

All public meetings and hearings are held in the Cleveland Heights City Hall, a handicapped accessible building. Notices of public hearings include information on how to contact the city if special assistance is required to attend.

### **III. PROGRAM PROPOSALS**

All applications for CDBG funds are presented to the CAC on a standardized application form prepared by the Department of Planning and Development. The Department of Planning and Development will provide technical assistance to any group wishing to make application to the Citizens Advisory Committee. Such technical assistance will be limited to assisting with the completion of the required application and will be available during regular working hours.

### **IV. CITIZEN COMMENTS: CONSOLIDATED AND ANNUAL PLANS GRANTEE PERFORMANCE REPORT**

The formation of the CAC, the newspaper advertisements and the public hearings are all designed to inform and involve the wider community in the CDBG program and ensure that the funded activities meet the national objectives, as well as community needs. The Consolidated Plan, Annual Plan and Consolidated Annual Performance Evaluation Report are public documents. They are available for review and public comment for the time period designated in the regulations at City Hall in the Department of Planning and Development. Ads are placed in the local newspaper, *The Sun Press*, and a notice is placed on the City's website informing the public of their availability. Copies of the documents are also available at the Cleveland Heights-University Heights Public Library and on the City's website.

### **V. GRIEVANCE PROCEDURE**

Submission of citizens' views, including a complaint or grievance, regarding the use of CDBG funds can be made directly to city staff at any time, verbally or in writing. Proposals for CDBG funds cannot be submitted unless there has been at least a 15-day period after publication for these comments. The City of Cleveland Heights will make every effort to respond to each written citizen comment within 15 working days, and will ensure citizens that their comments will become a part of the submission package.

### **VI. SUBSTANTIAL CHANGES**

The current Community Development Grant regulations require the City to adopt and make public definitions for a "significant change" in the Consolidated Plan. These local definitions are reviewed and adopted by CAC each January. They are then published in the local newspaper, *The Sun Press*.

The current definitions, as adopted by the Citizens Advisory Committee, are as follows:

1. A significant change will be considered to have occurred in the Consolidated Plan if:
  - a. A new activity is proposed.
  - b. An activity is eliminated.
  - c. An activity is increased or decreased by more than 10% of its budget for that year.

- d. An activity change occurs which will require displacement of persons, especially LMI persons.

## **VII. NEEDS OF NON-ENGLISH SPEAKING RESIDENTS**

The City of Cleveland Heights will provide a translator at any public hearing or regular meeting of the Citizens Advisory Committee if the City anticipates that five (5) or more non-English speaking residents understanding the same language will attend a meeting of the CAC or if a written request by an organization representing non-English speaking residents is received five (5) working days prior to the meeting.

## **VIII. CITY OF CLEVELAND HEIGHTS RESIDENTIAL ANTI-DISPLACEMENT AND RELOCATION PLAN**

The City of Cleveland Heights will replace all occupied and vacant occupiable low/mod income housing demolished or converted to a use other than low/mod income housing in connection with a project assisted with Federal housing and community development funds.

All replacement housing will be provided within three years of the commencement of the demolition or conversion. Before entering into a contract committing the City to provide funds for a project that will directly result in demolition or conversion, the City will make public by publication in a newspaper of general circulation, and submit to HUD, the following information in writing:

1. A description of the proposed assisted project;
2. The address, number of bedrooms, and location on a map of lower income housing that will be demolished or converted to a use other than as lower income housing as a result of an assisted project;
3. A time schedule for the commencement and completion of the demolition or conversion;
4. To the extent known, the address, number of bedrooms and location on a map of the replacement housing;
5. The source of funding and a time schedule for the provision of the replacement housing;
6. The basis for concluding that the replacement housing will remain low/mod income for at least ten (10) years from the date of initial occupancy;
7. Information demonstrating that any proposed replacement housing units

with smaller dwelling units (e.g., a two-bedroom unit with two one-bedroom units), or any proposed replacement of efficiency or single room occupancy (SRO) units with units of a different size, is appropriate and consistent with the housing needs and priorities identified in the approved Consolidated Plan.

To the extent that the specific location of the replacement housing and other data items 4 through 7 are not available at the time of the general submission, the City will identify the general location of such housing on a map and complete the disclosure and submission requirements as soon as the specific data are available.

The Department of Planning and Development is responsible for tracking the replacement of low/mod income housing and ensuring that it is provided within the required period.

The Department of Planning and Development is responsible for ensuring that the requirements of the Uniform Relocation Act and that the requirements of Section 104(d) of the Housing and Community Development Act of 1974, as amended are followed. Consistent with this, the Department of Planning and Development will ensure that the appropriate party(ies) provide relocation payments and other relocation assistance to any low/mod income person displaced by the demolition of any housing or the conversion of lower income housing to another use.

Consistent with the goals and objectives of activities assisted under the Act, the City will take the following steps to minimize the direct and indirect displacement of persons from their homes:

- I. Rehabilitation of multi-family developments to allow tenants to remain in the building/complex during and after the rehabilitation, working on empty units first.
- II. Require rental property owners to arrange and pay for facilities to house persons who must be relocated temporarily during rehabilitation
- III. Give priority to projects that do not cause direct or indirect displacement of lower income persons.

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