

CITIZEN PARTICIPATION PLAN



Citizen Participation Plan

STATEMENT OF PURPOSE

The City of Clearwater Citizen Participation Plan provides for a process that will promote public participation in the identification of local needs and priorities in regards to the City's planned expenditures dealing with the Community Development Block Grant (CDBG) and HOME Investment Partnership (HOME) programs. The City of Clearwater encourages citizens to participate in the following activities related to these programs:

- Citizen Participation Plan
- Consolidated Plan
- Annual Action Plan
- Fair Housing reports, such as Assessment of Fair Housing (AFH) or Analysis of Impediments to Fair Housing Choice (AI)
- Consolidated Annual Performance and Evaluation Report (CAPER)
- Identification of needs and priorities
- Program amendments
- Program implementation
- Federal regulatory changes
- Performance assessments
- Consideration of objections and complaints

Regulation 24 CFR Part 91.105 requires the City to develop a plan that encourages participation by very-low and low-income persons, especially those living in targeted slum and blighted areas, in revitalization areas, or areas where Federal funds are proposed to be used. While the regulation allows each local

governing body the flexibility in meeting the requirements, it does mandate certain guidelines. These requirements include developing and publicizing a plan for citizen participation in the formulation of grant applications and program development.

The City of Clearwater encourages all citizens to participate in the development of local Housing and Community Development programs, with particular emphasis on participation by persons of low and moderate income that are residents of areas targeted for funding. The City also encourages minorities and non-English speaking persons, and persons with mobility, visual or hearing impairments to participate in the process. The City of Clearwater will provide citizens with access to local meetings, information, and records relating to the proposed use of funds.

CONSULTATION

The regulations in 24 CFR Part 91.100 establishes the minimum requirements the City will follow to consult with the public on the needs of the community that can be addressed with federal housing and community development funding. These regulations require the City to consult with the following entities when preparing the Consolidated Plan, Annual Action Plan, and Fair Housing reports:

- The City shall consult with other public and private agencies that provide assisted housing, health services, and social services (including those focusing on services to children, elderly persons, persons with disabilities, persons with HIV/AIDS and their families and homeless persons) during preparation of such plans.
- The City shall consult with organizations that enforce Fair Housing laws and that represent protected class members and groups with regard to Fair Housing.
- The City shall consult with State or local health and child welfare agencies and examine existing data related to lead-based paint hazards and poisonings, including health department data on the addresses of housing units in which children have been identified as lead poisoned.
- When preparing the description of priority non-housing community development needs, the City shall notify adjacent units of general local government, to the extent practical. The non-housing community development plan must be submitted to the state, and, if the jurisdiction is a CDBG entitlement grantee other than an urban county, to the county.
- The City shall consult with adjacent units of general local government, including local government agencies with metropolitan-wide planning responsibilities where they exist,

particularly for problems and solutions that go beyond a single jurisdiction, to the extent practical.

- The City shall consult with the local public housing agency participating in an approved Comprehensive Grant program concerning consideration of public housing needs, planned programs and activities, and strategies for affirmatively furthering Fair Housing. The City of Clearwater will encourage participation of public and assisted housing residents in the preparation of such plans.

PHILOSOPHY OF CITIZEN INVOLVEMENT

Citizen participation is important in the development of the Consolidated Plan, Annual Action Plan, Fair Housing reports, and CAPER, and any substantial amendments or revisions to these documents. This plan emphasizes the need for a broad range of citizen opinion in the establishment of goals, objectives, projects, and priorities in the use of CDBG and HOME or other funds that the City receives and in the application, monitoring, and evaluation of funded programs.

The philosophy that governs the planning process supports and encourages all sectors of the community to participate in the development of Clearwater's grant applications and in all phases of the City's federal and state programs, and to insure that as many citizens as possible receive adequate information to form their recommendations.

The role of the Housing Division staff is to educate citizens, solicit their opinions, and translate these opinions into specific recommendations within the program planning framework.

Citizens should see their recommendations as advisory, recognizing that the final authority for decision-making rests with the City Council.

NEIGHBORHOOD AND AFFORDABLE HOUSING ADVISORY BOARD

Listed below are various sections from the City's Neighborhood and Affordable Housing Advisory Board (NAHAB) ordinance. The City Council has created the NAHAB, consisting of seven members who are residents of the City. Members shall be appointed by the City Council. The board shall include the following:

1. One citizen who is actively engaged in the residential building industry and/or those areas of labor engaged in residential building industry
2. One citizen who is actively engaged in the banking or mortgage industry
3. One citizen who is designated as an advocate for low-income persons
4. One citizen who is a provider of affordable housing and/or a real estate professional
5. One citizen who is a resident of one of the City's Neighborhood Revitalization Strategy Areas
6. One citizen who is a resident of the City
7. One citizen who is a resident of East Clearwater

The NAHAB shall elect from its membership a chairperson, a vice-chairperson, and such other officers as the board may find necessary. Each officer of the board shall serve for a term of one year. The chairperson shall not serve consecutive terms as chairperson.

The City Manager shall designate a city employee to serve as staff liaison for the board and to assist the board in the performance of its duties, including the appointment of a recording secretary to meet the board's administrative needs. Any request by the board for information, reports, or other significant work efforts that will reasonably be expected to exceed eight hours of staff time shall require advanced approval of City Council.

POWERS AND DUTIES OF THE NAHAB

The board shall have the following powers and duties:

1. Review the programs of the City which are directed to improving the physical environment and lifestyle of low- to moderate-income people assisted by the various federal and state housing and community development programs the City receives, by:
 - a. Assessing neighborhood needs
 - b. Formulating neighborhood goals and objectives
 - c. Establishing priorities for projects within neighborhoods
 - d. Monitoring programs
 - e. Evaluating programs.
2. The monitoring and evaluation of programs may, include the following activities:
 - a. Attending and participating in public hearings regarding the programs
 - b. Reviewing condition data

- c. Reporting citizen reactions to projects and programs
 - d. Reviewing reports regarding projects and program activities
 - e. Reviewing goals and objectives and recommending priorities for the order in which activities are to be undertaken
 - f. Reviewing applications for the funding of selected programs
3. Make recommendations to the City Manager and City Council regarding such programs.
 4. Carry out the duties of an advisory committee when and to the extent that an advisory committee may be required for the various state and federal housing and community development programs the City receives.

CITIZEN INVOLVEMENT

Process

The City of Clearwater encourages all citizens to participate in the development of the Consolidated Plan, Annual Action Plan, Fair Housing reports, and CAPER, and any substantial amendments or revisions to these documents. This Citizen Participation Plan places particular emphasis on participation by very-low- to moderate-income persons, particularly those living in slum and blighted areas and in areas where federal housing and community development funds are proposed to be used, and by residents of predominantly low- and moderate-income neighborhoods. The City will take whatever actions are appropriate to encourage the participation by minorities and non-English speaking persons, as well as persons with disabilities.

The City will solicit citizen involvement at the community level through public meetings and hearings on community development matters.

1. All aspects of citizen participation shall be conducted openly with freedom of access to all meetings, information, and public records by all interested persons.
2. The NAHAB and the Housing Division will solicit the involvement and opinions of low- and moderate-income persons, members of minority groups, residents of the target areas, the elderly, persons with disabilities, and other persons directly affected by, or interested in, the community development programs.
3. Where applicable the NAHAB will participate through all stages of the program, including development of the application, program implementation, monitoring, and evaluation.

4. The Housing Division and the NAHAB will provide the citizens of Clearwater with adequate and timely information, through press releases, advertisements, television programming and neighborhood meetings to enable them to be involved in decisions at various stages of the program.
5. To ensure that opportunities are available to hearing impaired citizens to participate in the process, the City has installed a telephone device system for the deaf.
6. To ensure that opportunities are available to non-English speaking people to participate in the process, the City will provide an English translator for public hearings where many non-English speaking residents are expected to participate.
7. The City will also take measures to encourage participation of residents of public and assisted housing developments low-income areas, and residents of targeted revitalization areas.
8. Clearwater will provide citizens with access to local meetings, information, and records relating to our proposed use of funds. The Housing Division will offer technical assistance to develop program proposals for groups representing persons of low and moderate income.
9. The City will hold public hearings to obtain citizen views and respond to citizen proposals and questions about proposed activities and program performance. The City will provide written answers, within 15 working days, to written complaints and grievances. The City encourages minorities and non-English speaking persons, and persons with mobility, visual or hearing impairments to participate in the process.

Scope of Participation

The NAHAB, as citizen representatives, shall participate through all stages of the program and, with the Housing Division, will be responsible for the development and inclusion of citizen comments.

The NAHAB is to comment on all plans and programs they feel necessary before they are submitted to the City Council for public hearings. These plans and programs may include:

1. Citizen Participation Plan
2. Consolidated Plan
3. Annual Action Plan
4. Fair Housing reports
5. Local Housing Assistance Plan (LHAP)

6. Consolidated Annual Performance and Evaluation Report (CAPER)
7. Subsequent amendments, revisions, and other changes to the above
8. Identifying community development and housing needs, and the setting of priorities

The NAHAB is to act as an advisory committee for any programs becoming operational under the Housing Division. With City Council approval, the Housing Division and/or their designees may directly assist in the operation of certain types of activities such as, but not limited to, other types of involvement that become feasible as tools to carry out the programs administered by the Housing Division.

The NAHAB is to be given regular progress reports concerning implementation of activities funded under the Housing Division and will solicit direct opinion from individuals and groups directly affected by ongoing activities about the effective performance of the implemented activities.

Submission of Views and Proposals

The Housing Division and the NAHAB encourage the submission of views and proposals regarding programs by citizens, particularly those low- and moderate-income persons residing within targeted areas. This includes submission of such views:

1. Directly to the City during the planning period before public hearings on the application.
2. Directly to the NAHAB during regularly scheduled meetings.
3. At neighborhood and other public meetings scheduled by the Housing Division and/or the NAHAB before public hearings.
4. At formal public hearings. The Housing Division shall respond to all proposals submitted directly to the department, and/or referred by the NAHAB, including written responses to written proposals stating the reasons for the actions taken by the City on the proposal.

PROGRAM AMENDMENT CRITERIA

For the purposes of this Plan, “substantial” amendments to the City’s Consolidated Plan and/or Annual Action Plan, shall be defined as and will be necessary when:

1. There is a reallocation/reprogramming of funds equaling more than 25 percent in the aggregate of the City's combined CDBG and HOME allocations to an activity(s) previously described in the Consolidated Plan and/or Annual Action Plan(s)
2. A decision is made to carry out an activity not previously described in the Consolidated Plan and/or Annual Action Plan(s), including program income
3. The purpose, scope, location(s) or beneficiaries of an activity are substantially changed. An activity will be considered substantially changed when any of the following criteria applies:
 - a. The activity will no longer principally benefit the targeted population as identified in the Consolidated Plan and/or Annual Action Plan(s).
 - b. The activity will no longer address the low- and moderate-income needs identified in the Consolidated Plan and/or Annual Action Plan(s) or the activity ceases to address the qualifying National Objectives as per 24 CFR Part 570.208.
 - c. The activity location changes so that the completed activity will principally serve beneficiaries other than those originally intended.
 - d. The scope of the activity has increased to the point where its completion would result in the inability to carry out another approved activity, or would require reducing the scope of another activity to a point where it would not accomplish its intended purpose.

Additionally, for the purposes of this Plan, "revisions" to the City's Fair Housing reports, including the Assessment of Fair Housing (AFH) and Analysis of Impediments to Fair Housing Choice (AI), shall be defined as and will be necessary when:

1. There is a material change in circumstances in the jurisdiction that affects the information on which the AFH or AI is based, to the extent that the analysis, the fair housing contributing factors, or the priorities and goals of the AFH or AI no longer reflect the actual circumstances.

The City will adhere to all internal City policies in terms of notifying and obtaining proper approvals on all substantial amendments or revisions.

Before making any substantial amendments to the Consolidated Plan and/or Annual Action Plan(s), or any revisions to Fair Housing reports, the City shall provide citizens with information concerning the proposed change(s) and an opportunity to comment on the proposed amendments or revisions and

provide reasonable notice of such proposed changes. The City shall consider such comments and modify the proposed changes as appropriate. The City shall make available to the public, and to the U.S. Department of Housing and Urban Development (HUD), a description of such changes as adopted. The City will provide a period, not less than 30 days, to receive comments on the substantial amendments or revisions before the amendments or revisions are implemented. The City of Clearwater will consider any comments or views of citizens received in writing, or orally at public hearings, in preparing substantial amendments to the Consolidated Plan and Annual Action Plan or revisions to Fair Housing reports. A summary of these comments or views shall be attached to any substantial amendments to the Consolidated Plan and Annual Action Plan, or revisions to Fair Housing reports.

TECHNICAL ASSISTANCE

The Housing Division shall provide technical assistance through staff or other resources. Such assistance shall be available regularly:

1. To the NAHAB for their participation in planning, implementation, monitoring, and evaluation
2. To groups representing persons of low and moderated income that request assistance developing proposals for funding under any of the programs covered by the Consolidated Plan and/or Annual Action Plan(s)
3. To assist citizens in carrying out Consolidated Plan and/or Annual Action Plan(s) activities.

ADEQUATE INFORMATION

The City, through the Housing Division will provide full disclosure and public access to citizens, public agencies, and interested parties, of all program information. The information will include the following:

1. The expected funds to be available (including annual grants, program income and any un-programmed funds)
2. The range of activities that may be undertaken with those funds
3. The estimated funds proposed for activities that will benefit low- and moderate-income persons
4. The proposed activities likely to result in displacement and the City's plans for minimizing such displacement of persons because of its proposed activities
5. The types and levels of assistance the City will make available (or to require others to make available) to persons displaced by funded activities, even if the City expects no such displacement to occur.

6. The City will publish a summary of the proposed Consolidated Plan, Annual Action Plan, Fair Housing reports, or any substantial amendments or revisions, in a local newspaper for 30-day public comment before such plans or amendments/revisions are submitted to HUD for review. The advertisement will also identify a location in which interested parties can view the entire document or obtain a copy of such plans. The City will provide copies of such plans or amendments/revisions upon request.

ACCESS TO RECORDS

The City will provide citizens, public agencies, and other interested parties with reasonable and timely access to information and records about the City's Consolidated Plan, Annual Action Plan, Fair Housing reports, and CAPER, and the City's use of funding under the programs covered by these plans.

CITIZEN COMMENTS

Consolidated Plan, Annual Action Plan, and Fair Housing Reports

The City will provide citizens with a reasonable opportunity to comment on the Consolidated Plan, Annual Action Plan, and Fair Housing reports. The City will publish in local newspapers, such as the Tampa Bay Times, a notice of availability and summary of the proposed Consolidated Plan, Annual Action Plan, and/or Fair Housing reports. Copies of the proposed documents will be available in several areas throughout the City including the City's website, public libraries, and the City's Housing Division and City Clerk Departments.

The City will establish a 30-day comment period on the Consolidated Plan, Annual Action Plan, and Fair Housing reports to receive public comments. The City will consider any comments or views of citizens received in writing, or orally at the public hearings, in preparation of final documents. A summary of any comments or views shall be attached to final documents.

Performance Reports

The City will provide citizens with reasonable notice and an opportunity to comment on the annual CAPER report. Copies of the CAPER will be available in several areas throughout the City including the City's website, public libraries, and the City's Housing Division and City Clerk Departments. The Citizen Participation Plan provides a period of not less than 15 days, to receive public comments on the annual CAPER report before its submission.

The City will consider any comments or views of citizens received in writing, or orally at public hearings, in preparing the performance report. A summary of these comments or views shall be attached to the final report.

PUBLIC HEARINGS

The City will hold public hearings to address housing and community development needs, development of proposed activities, and the review of program performance. Public hearings will seek to obtain citizen views and respond to citizen proposals and questions.

The City will hold at least two public hearings on the Consolidated Plan and Fair Housing reports, one of which must be held before each document is published for public comments. The City will hold at least one public hearing on the Citizen Participation Plan, Annual Action Plan, and CAPER.

For the purposes of the Citizen Participation Plan, Consolidated Plan, Annual Action Plan, Fair Housing reports, and CAPER, a meeting of the NAHAB will be considered a Public Hearing.

The City will place an ad in the local newspaper 10 days before each public hearing to notify the citizens of each hearing, with sufficient information about the subject of the hearing to allow informed comments. The public hearings will be held at times and locations convenient to potential and actual beneficiaries, and with accommodations for persons with disabilities. The City will also provide translation for non-English speaking residents at public hearings where many non-English speaking residents are expected to participate.

RESIDENTIAL ANTI-DISPLACEMENT AND RELOCATION ASSISTANCE

According to section 104(d) of the Act, the City will adopt, make public, and certify that it is following a residential anti-displacement and relocation assistance plan providing one-for-one replacement units (paragraph (c)(1) of this section), and relocation assistance (paragraph (c)(2) of this section).

Before the City enters a contract committing it to provide funds under this part of any activity that will directly result in the demolition of low/moderate-income dwelling units or the conversion of very-low to

moderate-income dwelling units to another use, the City will make public, and submit the following information in writing to the HUD Field Office for monitoring purposes:

- A. A description of the proposed assisted activity
- B. The location on a map and the number of dwelling units by size (number of bedrooms) that will be demolished or converted to a use other than for low/moderate-income dwelling units as a direct result of the assisted activity;
- C. A time schedule for the commencement and completion of the demolition or conversion;
- D. The location on a map and the number of dwelling units by size (number of bedrooms) that will be provided as replacement dwelling units. If such data is not available at the time of the general submission, the submission shall identify the general location on an area map and the approximate number of dwelling units by size, and information identifying the specific location and number of dwelling units by size shall be submitted and disclosed to the public when it is available
- E. The source of funding and a time schedule for the provision of replacement dwelling units
- F. The basis for concluding that each replacement dwelling unit will remain a low/ moderate-income dwelling unit for at least 10 years from the date of initial occupancy
- G. Information demonstrating that any proposed replacement of dwelling units with smaller dwelling units (e.g., a 2-bedroom unit with two 1-bedroom units) is consistent with the needs analysis.

CONSIDERATION OF COMPLAINTS AND GRIEVANCES

Any complaint or grievance initiated by a citizen and received in written form should first be referred for administrative disposition to the Housing Division Assistant Director who shall reply directly to the citizen in written form within 15 days of receipt, and further indicate to the citizen avenues of appeal available. If the citizen is not satisfied with the determination of the Housing Division Assistant Director, he/she may appeal to NAHAB presenting the complaint in written or oral form. The NAHAB may decide that the staff has sufficiently addressed the problem and take no further action or it may request that staff respond in another manner.

DOCUMENTS

Documents used for the Housing Division administered federal and state programs shall be available upon request, during normal working hours. Copies of the following materials shall be available from the Housing Division located at City Hall.

1. All mailings and promotional material
2. Records of hearings
3. All key documents, including all prior applications, letters of approval, performance reports, evaluation reports, Assessments of Fair Housing, other reports required by HUD and the State of Florida, and the proposed and approved Consolidated Plan and/or Annual Action Plan for the current year
4. Copies of regulations and issuances governing the program

To give adequate notice of public hearing:

1. Prior to each public hearing, the City shall publish notice in easily readable type, no smaller than seven point, in the non-legal section of a newspaper of general circulation reaching persons of low/moderate income.
2. The City may supplement this with advertisements in neighborhood newspapers or periodicals serving low/moderate-income neighborhoods.
3. The City shall, if required and at the determination of the City Attorney, publish additional legal notice. Such notices shall show the dates, times, places and procedures of the hearing, the topics to be considered, basic information about the, program, and the procedures and timing being followed in the development and approval of the application
4. The City may, as appropriate, use radio, television, newspapers, websites, and other media to publicize public hearings.

POINTS OF CONTACT

As a guide for citizen interaction through the Consolidated Planning process, the following specific contacts are furnished:

Local Government:

Chuck Lane, Assistant Director of Economic
Development and Housing
P. O. Box 4748, Clearwater, FL 33758
Phone: (727) 562-4023

Bill Horne, City Manager
P.O. Box 4748, Clearwater, FL 33758
Phone: (727) 562-4040

Denise Sanderson, Director of Economic
Development and Housing
P. O. Box 4748, Clearwater, FL 33758
Phone: (727) 562-4031

Frank Hibbard, Mayor
City of Clearwater
P. O. Box 4748, Clearwater, FL 33758
Phone: (727) 562-4050

Neighborhood and Affordable Housing Advisory Board (NAHAB):

Peter Scalia, Chair
P.O. Box 4748, Clearwater, FL 33758
Phone: (727) 562-4030

The United States of America:

Lisa Hill, Director of Community Planning & Development
U.S. Dept. of Housing & Urban Development
400 West Bay Street, Suite 1015
Jacksonville, FL 32202
Phone: (904) 208-6077

MEDIA USAGE

All requisite public notices and advertisements shall be advertised in the Tampa Bay Times. Additional supplementary advertisements and notices may be placed in The Weekly Challenger and other publications. Also, notices shall be published on the City of Clearwater website at www.myclearwater.com/housing.

DEPOSITORIES OF INFORMATION

All program documents, including all mailings and promotional material; records, prior applications; grant agreements; this plan; performance reports; evaluation reports; regulations and any other documentation concerning the CDBG, HOME, and SHIP programs are available during normal working hours at the Economic Development & Housing Department.

Copies of any documentation will be furnished to interested persons upon request and without charge by that office.

In addition, copies of the current Citizen’s Participation Plan, the Consolidated Plan, Annual Action Plan(s) and the most recent performance report are available for inspection at the following location:

Economic Development & Housing Department
City of Clearwater Offices
One Clearwater Tower, 6th Floor
600 Cleveland St.
Clearwater, FL 33755

CITIZEN INVOLVEMENT DURING EMERGENCY SITUATIONS

In the event that the conditions or urgent needs of a national, state, or local emergency limit the City’s ability to carry-out the citizen participation plan process outlined in this Citizen Participation Plan; the City hereby establishes expedited procedures for citizen involvement. These expedited procedures may apply to all HUD-related plans and reporting documents, including the Consolidated Plan, Annual Action Plan, CAPER, Fair Housing reports, and substantial amendments.

- Any required public notice and comment period may be reduced to five (5) days in duration, or the minimum number of days advised by any HUD waiver of citizen participation requirements.
- If in-person public hearings are not allowed for the health and safety reasons cited by national, state, or local authorities, public hearing requirements may be met with virtual public hearings if such virtual public hearings provide:
 - Reasonable notification and access for citizens,
 - Timely response from local officials to all citizen questions and issues, and
 - Public access to all questions and response.

- Documents and reports should be made available for public review as defined within the City’s current Citizen Participation Plan. In the event that conditions prohibit hard-copy distribution of documents and reports, the City will make such materials available upon request.

HUD may issue further or alternative guidance for citizen participation during a national, state, or local emergency event, in which case such guidance from HUD will supersede and replace the expedited process outline herein.