

CDBG CITIZEN PARTICIPATION PLAN City of Marietta, Ohio

The City of Marietta is required by the U.S. Department of Housing and Urban Development (HUD), pursuant to 24 CFR §91.105, to have a detailed Citizen Participation Plan (CPP) which contains the City's policies and procedures for public involvement in the three-year Consolidated Plan and Annual Action Plan process and the use of Community Development Block Grant (CDBG). This CPP is available to the public.

OVERVIEW OF ANNUAL ACTION/CONSOLIDATED PLAN PROCESS

The policies and procedures in this CPP relate to several stages of action mentioned in law or regulation. In general, these stages of events include:

- Identification of housing and community development needs;
- Preparation of the draft use of funds for the upcoming year, known as the proposed "Annual Action Plan;" or the development of the new three-year proposed plan known as the "Consolidated Plan;"
- Formal approval by City Council of final Annual Action Plans and/or final three-year Consolidated Plan;
- Occasional necessary change to the use of budgeted funds in an Annual Action Plan; or change to the priorities established in the three-year Consolidated Plan;
- Annual Performance Report to HUD at program year completion drafted for public review and comment.

ENCOURAGEMENT OF CITIZEN PARTICIPATION

Citizens are encouraged to participate in the development of the Consolidated Plan, any substantial amendments to said plan, the Analysis of Impediments to Fair Housing Choice (A of I)/amendments to the A of I, and the Consolidated Annual Performance and Evaluation Report (CAPER).

The City especially encourages participation particularly from persons living in slum and blighted areas, and in areas in which CDBG funds are proposed to be used and by residents of predominantly lower-income neighborhoods. The City also strongly encourages participation from its minority and non-English speaking residents as well as persons with disabilities residing in Marietta.

CITIZEN COMMENT ON THE CITIZEN PARTICIPATION PLAN AND AMENDMENTS

The City will provide citizens with a reasonable opportunity (no less than 15 calendar days) to publicly review and comment on its Citizen Participation Plan and any subsequent substantial amendments to said plan. The plan's availability for review will be advertised in the local newspaper, The Marietta Times, at least 15 calendar days prior to the first day of the review and comment period. The Citizen Participation Plan will also be made available in electronic and alternative formats upon request. The adopted plan will be considered public and available for citizen review, upon request, in the Development Department, located in the City Administration Building at 304 Putnam Street, Marietta, Ohio during normal City of Marietta business hours.

DEVELOPMENT OF THE CONSOLIDATED PLAN

The City will hold two public hearings at different stages of the Consolidated Plan preparation to obtain citizen views and to respond to questions or proposals. All public hearings will be advertised in the local newspaper of circulation (the Marietta Times) not less than 15 calendar days before the scheduled public meeting. All advertisements published in relation to the development of the Consolidated Plan will be placed in easily readable type in the non-legal section of the newspaper. Each advertisement published will state the date, time and place of the public hearing.

One public hearing will be held prior to the onset of the *Consolidated Plan* preparation process (before the adoption of said plan) in order to invite comments, suggestions or questions pertaining to the development of priority needs and the solicitation of project proposals that can be considered by the City for funding. The City will make available the following information at this hearing: the amount of assistance that the City expects to receive (including grant and program income) and the range of activities that can be undertaken, including the estimated amount that will benefit persons at lower income levels as well as the City's plan to minimize the displacement of persons. The newspaper advertisement for this hearing will also summarize the above-noted information that is to be made available to the public at the hearing. A second public hearing will be held to provide the public with the opportunity to comment on the final draft of the *Consolidated Plan* and list of proposed activities before submission to HUD.

The proposed *Consolidated Plan* will be published in order to afford citizens, public agencies, and other interested parties a reasonable opportunity to examine its contents and to submit comments to the City. In accordance, the City will advertise the availability of the document in the *Marietta Times* at least 15 calendar days prior to the first day of the 30-day review and comment period. The *Consolidated Plan's* availability for said review and comment period will be for no less than 30 calendar days. This will enable the public adequate time to review the plan and submit its comments to the City for further consideration. The City will identify, within the newspaper advertisement, the location(s) where the proposed draft of the plan may be viewed. A draft of the *Consolidated Plan* will also be made available on the City's website (www.mariettaoh.net) for review and comment. At a minimum, the draft will be available for review in the Development Department located in the City Administration Building, 304 Putnam Street; however, the local public library and other locations may also be made available by the City as needed. The newspaper advertisement announcing the *Consolidated Plan's* availability for review and public comment will also contain a brief summary of said plan. This summary will include a description of the contents and purpose of the *Consolidated Plan* and a list of the location(s) where copies of the entire proposed Consolidated Plan may be examined. The City will consider any comments or views of citizens received in writing or orally at the public hearings in preparing the final *Consolidated Plan*.

The City will make available, upon request, up to 20 free copies of the Executive Summary portion of the *Consolidated Plan* to low-income persons and groups (limit of one per household or group) during the advertised 30-day review and comment period. The free copies will be available on a first-come, first-serve basis through the Development Department, 304 Putnam Street, Marietta, Ohio. A draft of the *Consolidated Plan* is also available in electronic format, and upon request, can be e-mailed to interested parties.

SUBSTANTIAL AMENDMENTS TO THE CONSOLIDATED PLAN

The City of Marietta encourages citizens to participate in the development of any substantial amendments to the *Consolidated Plan*. The City will hold at least one public hearing prior to the adoption of any substantial amendment to the approved *Consolidated Plan*.

A *Substantial Amendment* is defined as any change to the approved *Consolidated Plan* that includes one or more of the following criteria:

1. A change in the allocation priorities as set forth in the City's *Consolidated Plan*, including any change in the method of distributing funds;
2. Plans to carry out any activity using funds from any program covered by the City's *Consolidated Plan* (including Program Income), not previously described in the *Annual Action Plan*;
3. To change the purpose, scope, location and/or beneficiaries of an activity (to include changes in the use of CDBG funds from one eligible activity to another); and
4. Any increase or decrease in any activity 25 percent (25%) or more of the amount originally budgeted for that specific activity.

The public will be provided a period not less than 30 calendar days to review and comment on any substantial amendment to the *Consolidated Plan*. The public hearing will be advertised in the local newspaper of circulation (the *Marietta Times*) not less than 15 calendar days before the scheduled hearing. Any written comments received by the City during the 30-day public comment period as well as any written or oral comments submitted during the public meeting will be considered prior to the approval of any substantial amendment to the *Consolidated Plan*. As part of its submission of the substantial amendment to the *Consolidated Plan* to the Department of Housing and Urban Development, the City will summarize the manner in which any and all comments were considered with regard to the proposed substantial amendment. The City will also summarize any comments not accepted as part of its consideration and the reasons therefore.

PERFORMANCE REPORTS

The City encourages citizens to participate in the development of the *Consolidated Annual Performance and Evaluation Report (CAPER)*. Citizens will be provided with a newspaper (the *Marietta Times*) advertisement notice at least 15 calendar days prior to the first day of public review/comment that the *CAPER* is available for public review and comment for a period of no less than 15 calendar days. The City will consider any comments or views received in writing or orally. A summary of any comments or views received during the period will be attached to the performance report and made a part of the submission made to the Department of Housing and Urban Development.

PUBLIC HEARINGS

At least two public hearings will be held each year to obtain citizens' views and to respond to proposals and questions. Said hearings are to be conducted within two different quarters during each program year. Together, these hearings must address housing and community development needs, development of proposed activities, and review of program performance. At least one of these hearings is to be held before the proposed *Consolidated Plan* is published for comment.

All public hearings will be advertised in the local newspaper of circulation (*The Marietta Times*) not less than 15 calendar days before the scheduled public hearing. All advertisements published in relation to the development of the *Consolidated Plan* will be placed in easily readable type in the non-legal section of the newspaper. Each advertisement will state the date, time and place of the public hearing. All public hearings will be held in locations providing complete handicap accessibility and in locations centrally located in the community to provide easy access to all residents. All public hearings will begin and be completed within timeframes when the local public transportation system (the CABL Public Transit) is in operation, making the hearing more accessible to persons who might be potential or actual beneficiaries. Persons requiring added public hearing accommodations may make requests in advance (as noted within the newspaper advertisement announcing that specific public hearing).

As already noted, the City does not have high concentrations of non-English speaking persons. The City will, however, make every effort to encourage participation at all public hearings by non-English speaking persons by providing interpretation and translation if requested in advance (as noted within the newspaper advertisement announcing that specific public hearing). The cost of such services will be paid for by the City using CDBG funds and will not be passed along to those persons being assisted.

Citizens providing commentary at public hearings must adhere to the following procedures:

- Citizens are to refrain from making commentary on information presented until the public comment portion of the hearing is announced;
- Those making public comment must state their name and address for the record;
- Those making public comment are limited to 3 minutes
- Staff will not engage in dialogue with the public during this time.

MEETINGS/PUBLIC FORUMS

In the event any meetings are held, citizens are encouraged to attend. Notices will be placed at least 7 calendar days in advance of said meetings on various bulletin boards throughout the City Administration Building located at 304 Putnam Street, Marietta, Ohio. A "brief" will also be published in the *Marietta Times* at least 7 calendar days prior to the meeting/public forum. Both the notices and briefs will state the date, time and place of the meeting.

AVAILABILITY TO THE PUBLIC

The *Consolidated Plan* (as adopted), any substantial amendments to the *Consolidated Plan*, *A of I/amendments to the A of I*, and the CAPER will be available to the public upon request. This includes the availability of materials in a format accessible to persons with disabilities upon request. Requests must be made to the Development Department, located at the City Administration Building, 304 Putnam Street, Marietta, Ohio during normal City of Marietta business hours on Monday through Friday from 8:00 a.m. until 4:30 p.m. (except during City holidays). Materials can be obtained in either hard copy or via e-mail for electronic format.

ACCESS TO RECORDS

All records, documents and reports pertaining to the preparation, adoption and implementation of the City's *Consolidated Plan*, CAPER, *A of I/amendments to the A of I*, and Community Development Block Grant program are kept in the office of the Development Department, 304 Putnam Street., Marietta, Ohio 45750 (Phone: (740) 373-9354; Fax: (740) 373-2574). Documents will be made available to the public upon request during regular business hours as stated above. Records pertaining to the City's *Consolidated Plan* and Community Development Block Grant program will be retained in accordance with applicable Public Record Retention laws, but in no case for a period less than five years.

TECHNICAL ASSISTANCE

Technical assistance will be provided to any group representative of persons at lower income levels that request such assistance in developing proposals for funding assistance under any of the programs covered by the *Consolidated Plan*. Technical Assistance is limited to answering any questions/providing clarification in relation to any written guidance related to the development of proposals for funding.

CITIZEN COMPLAINTS

The City will provide a timely and substantial written response within 15 calendar days to any complaints received regarding the preparation, implementation or performance reporting of the *Consolidated Plan* or any other aspect of the Community Development Block Grant program.

PERSONS WITH DISABILITIES

Public hearings and community meetings will be held in locations accessible to persons with restricted mobility. All public hearings will be held at times when the CABL Public Transit is in operation. The CABL Public Transit is the local public transit system. Its vehicles are accessible to persons with disabilities. Upon request, copies of all written materials are available in alternative formats.

PERSONS WITH LIMITED-ENGLISH PROFICIENCY

Based on figures from the 2000 Census, the City does not have high concentrations of non-English speaking persons. The City will, however, make every effort to provide interpretation and translation if provided at least 72 hours' advance notice. The cost of such services will be paid for by the City using CDBG funds and will not be passed along to those persons being assisted.

ANALYSIS OF IMPEDIMENTS TO FAIR HOUSING CHOICE (A of I)

The City encourages citizens to participate in the development of the *A of I*. No less than two public forums will be conducted in accordance with the provisions set forth above. Citizens will be provided with a newspaper (the Marietta Times) advertisement notice at least 15 calendar days prior to the first day of public review/comment that the *A of I* is available for public review and comment for a period of no less than 15 calendar days. The City will consider any comments or views received in writing or orally. A summary of any comments or views received during the period will be attached to the submission made to the Department of Housing and Urban Development.

WAIVER

CARES Act Flexibilities for CDBG Funds Used to Support Coronavirus

The City reserves the option to shorten aforementioned reasonable notice and public comment number of days in order to utilize any waivers made available by HUD. The City also reserves the option to hold electronic/broadcast public meetings (allowing for remote public comment) resulting from national or state emergencies/disasters.