

**CITY OF ST. LOUIS
COMMUNITY DEVELOPMENT ADMINISTRATION**

**CITIZEN PARTICIPATION PLAN
NOVEMBER, 2004**

CITIZEN PARTICIPATION PLAN

Introduction

Beginning with federal fiscal year 1995, the City of St. Louis, through the Community Development Administration (CDA), engaged in a planning process in which four formula programs, Community Development Block Grant (CDBG), HOME Investment Partnerships (HOME), Emergency Shelter Grant (ESG), and Housing Opportunities for Persons with AIDS (HOPWA), were to be consolidated into a single funding application as required by HUD. It was believed that this consolidation would offer local jurisdictions a better chance to shape various programs into effective, coordinated neighborhood and community development strategies. It was also intended to create the opportunity for strategic planning and citizen participation to take place in a comprehensive context, and to reduce duplication of effort at the local level. The City's Citizen Participation Plan was consequently amended in 1996 to reflect these changes. Since that time further revision has been determined to be necessary. The plan outlined below reflects additional changes to the plan and reflects the City's effort to engage the citizenry in an exchange of dialog that will help shape the priorities and strategies that will become the Consolidated Plan for utilizing the four housing and community development programs.

Development of the Consolidated Plan

The Consolidated Plan integrates economic, physical, environmental, community, and human development in a comprehensive coordinated fashion so that families and communities can work together and thrive. The Consolidated Plan replaces the City's Annual CDBG Statement, Comprehensive Housing Affordability Strategy, HOME, ESG, and HOPWA applications.

The Plan recommends specific expenditures during a one-year time frame (the Annual Action Plan) and makes longer-term recommendations over the next five year planning period. Before the City adopts the Consolidated Plan, a summary of proposed activities that identify the amount of assistance the City expects to receive (including grant funds and program income) and the range of activities that may be undertaken, including the estimated amount that will benefit persons of low and moderate income, is provided at public meetings for questions and comments. After citizen input is obtained, the plan is approved by the Mayor and the Board of Aldermen prior to submission to the Department of Housing and Urban Development.

Local Government Consultation, General

In preparing the Consolidated Plan, the City will consult with those public and private agencies that provide assisted housing, health services, and social services, including those that focus on services to children, elderly persons, persons with disabilities, persons with AIDS and their families, and homeless persons. In preparing that section of the Consolidated Plan related to lead-based paint hazards, the City will consult with local health and child welfare agencies and examine current data related to lead-based paint hazards and poisoning, including health department data on the addresses of housing

units in which children have previously been identified as lead poisoned. In preparing the description of priority nonhousing community development needs, the City will notify adjacent local governments to the extent possible and submit the nonhousing community development plan to the State of Missouri. Lastly, the City will consult with adjacent governments to discuss problems and solutions for activities that extend beyond the City's jurisdiction.

Local Government Consultation, HOPWA

St. Louis is the largest city in the eligible metropolitan statistical area (EMSA) and, as such, is required to consult broadly with other jurisdictions within the EMSA. The intent is to develop a metropolitan-wide strategy for addressing the needs of persons with HIV/AIDS and the families living within the EMSA. All jurisdictions within the EMSA are expected to assist the City in preparation of the HOPWA application for funds.

Local Government Consultation, Public Housing

The City will consult with the St. Louis Housing Authority concerning public housing needs and planned Comprehensive Grant program activities. The consultation is intended to provide a better basis for the certification by the Chief Executive Officer that the Comprehensive Grant Plan/annual statement is consistent with the City's assessment of low-income housing needs and the City will cooperate in providing resident programs and services. The consultation will further help to ensure that activities related to drug elimination, neighborhood improvement programs, and resident programs and services are fully coordinated to achieve comprehensive community development goals.

Citizen Participation -Local Governments

Citizens of the City of St. Louis are encouraged to participate in the development of the consolidated plan as well as any substantial amendments to the plan. In addition, citizens are encouraged to review the draft of the annual performance report prior to submission to HUD and voice any comments or concerns related to the contents of the performance report. Participation by low and moderate income persons, particularly those living in slum or blighted areas, is especially encouraged as is participation by those persons living in areas where CDBG funds are proposed to be used. Further, participation of all City residents is encouraged, including minorities and non-English speaking persons, as well as persons with disabilities. Where appropriate, necessary accommodations will be made through the City's Office on Disabled. The City encourages the participation of public and assisted housing development residents in developing and implementing the consolidated plan along with other low income residents of targeted revitalization areas in which developments will be located. Further, the City will provide information to the Housing Authority related to consolidated plan activities to assist the Housing Authority in carrying out its annual public hearing required under the Comprehensive Grant program. Citizens wishing to comment on the Citizen Participation Plan or on substantial amendments to the Plan will have a minimum 15 day window of opportunity in which to comment. Accommodations will be made for persons with disabilities who wish to provide comments.

Citizen Participation -Local Governments

In the development of the Consolidated Plan, the City will make known to citizens, public agencies, and other interested parties, to the extent it knows, the amount of assistance the City expects to receive, the range of activities to be undertaken, and the estimated amount that will benefit low and moderate income persons. The amount of assistance will include both anticipated grant funds and program income. It is the City's policy to minimize displacement to the maximum extent possible in all activities undertaken through the Consolidated Plan. This policy is officially set forth in the *Residential Antidisplacement and Relocation Assistance Plan* of November 2000 and is available to citizens upon request. Further, a draft of the proposed Consolidated Plan will be made available to citizens to allow them the opportunity to review the draft plan and submit comments as appropriate. At least 30 days prior to transmittal of the plan to the Department of Housing and Urban Development, a notice will be placed in the local newspaper indicating the availability of the draft plan for review and comment. A similar notice, along with the actual draft plan, will be placed on the City's website, <http://stlouis.missouri.org>. Lastly, copies of the draft plan will be available for review and comment at local libraries and the offices of the Planning and Urban Design Agency and the Community Development Administration. Upon request, a reasonable number of copies will be made available to citizens and organizations requesting the plan at no charge. The City will take into consideration any comments received in writing or orally at public hearings in preparing the final consolidated plan. A summary of these comments shall be included in the final consolidated plan.

Citizen Participation -Local Governments

Amendments to the Consolidated Plan will be handled in the same manner with the same provisions for review and time frames as previously stated. A substantial amendment to the Consolidated Plan will be considered to exist when there is a proposed change in activity, scope or funding that deviates significantly from the overall intent of the most recent five year plan. As is the case in receiving comments related to the original Consolidated Plan, the City will take into consideration any comments related to amendment of the Consolidated Plan. A summary of comments, if any, shall be included in the final amended Consolidated Plan.

Citizen Participation -Local Governments

The City is required to submit its Consolidated Annual Performance and Evaluation Report (CAPER) ninety days after the end of its program year. The City's program year extends from January 1st through December 31st and consequently the CAPER must be submitted to HUD on or before March 31st of each year. The report provides information relating to activities and funding expenditures taking place during the program year for each of the four grants received by the City. Prior to submission of the report to HUD, citizens will have a fifteen day period in which to comment on the draft performance report. Upon publication in the local newspaper and on the City's website, the draft report will be available for review at local libraries and at Community Development Administration offices. Comments received will be taken into consideration and included with the final performance report.

Citizen Participation -Local Governments

The Consolidated Planning process will include two public hearings each year to obtain citizen views and to respond to proposals and questions. The hearings will be held at different stages of each program year addressing housing and community development needs, development of proposed activities, and review of program performance. In an effort to obtain citizen views related to the consolidated plan, one hearing will be conducted prior to the draft consolidated plan being published for comment. The hearings will be advertised through notice in one local newspaper of general circulation and also in one minority newspaper. Notice will further be provided through the City's website with all notices being provided at least ten days prior to the public hearing. Correspondence may also be sent to agencies receiving CDBG or HOME funding in an effort to make sure that such agencies are made aware of future needs and potential funding levels for upcoming years. Meetings will be held at times and locations convenient to potential and actual beneficiaries, and will be held in locations accessible to persons with disabilities. Normally, one meeting will be held during normal working hours and one meeting will be conducted during evening hours to accommodate those persons unable to attend the daytime meeting. The City's Office on the Disabled will help to ensure that meetings are fully accessible to persons with disabilities, including those persons who may be non-English speaking and require an interpreter.

Citizen Participation -Local Governments

Copies of the Consolidated Plan, Annual Action Plans, and any amendments to either of these two documents, are maintained in the Office of the Community Development Administration as are copies of the Consolidated Annual Performance and Evaluation reports. These documents are available for review upon request by interested individuals or organizations. In addition, the most recent year for each of these documents is located on the City's website, <http://stlouis.missouri.org>. Individuals with disabilities wishing to review any of these documents will be provided assistance through the Office on the Disabled.

Citizens will also be afforded the opportunity to review information and records related to these documents up to the preceding five year period. Most plans and annual performance reports going back to the beginning of the CDBG program are maintained in CDA offices and are available for review or inspection. Should the need arise for help in developing proposals for low and moderate income persons, technical assistance will be provided to the extent necessary. Any complaints related to the Consolidated Plan, the Annual Action Plan, or the Consolidated Annual Performance and Evaluation Report will be reviewed by agency staff with responses provided within fifteen days of receipt.