



# **CITIZEN PARTICIPATION PLAN CITY OF COLUMBIA**

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**MARCH 2020**

# POLICY CHANGES OR UPDATES TABLE

Action	Affected Section	Date
<b>Version 1 - Approval</b>	Entire document	3/2020

# TABLE OF CONTENTS

<b>CITY OF COLUMBIA COMMUNITY DEVELOPMENT DEPARTMENT CITIZEN PARTICIPATION PLAN</b> .....	4
1. PURPOSE.....	4
2. GOALS .....	4
3. CITIZEN PARTICIPATION PROCESS.....	5
4. ASSURANCE OF ENGAGEMENT EFFORTS .....	6
5. ACCESSIBILITY & PROVISIONS .....	7
6. AVAILABILITY TO THE PUBLIC & ACCESS TO RECORDS.....	8
7. CDBG CONSOLIDATED PLAN & ANNUAL ACTION PLAN: PUBLIC NOTICE AND COMMENT PERIODS .....	9
8. CDBG-DR ACTION PLANS: PUBLIC NOTICE AND COMMENT PERIODS.....	16
9. CDBG-MIT ACTION PLANS: PUBLIC HEARINGS AND COMMENT PERIODS.....	23

# CITY OF COLUMBIA

## COMMUNITY DEVELOPMENT DEPARTMENT

### CITIZEN PARTICIPATION PLAN

## 1. PURPOSE

The overall purpose of the Citizen Participation Plan is to provide for and encourage citizens to participate in an advisory role in planning, implementing, and assessing the programs of City of Columbia's Community Development (CD) Department. The City of Columbia has adopted a Citizen Participation Plan (CPP) that sets forth the City's policies and procedures for citizen participation during the development and implementation of HUD-funded activities and programs.

The City of Columbia's Citizen Participation Plan encourages citizens to participate in the development of:

- The Five-year Consolidated Plan
- Annual Action Plan
- Consolidated Annual Performance and Evaluation Report (CAPER)
- HOME Investment Partnerships (HOME)
- Housing Opportunities for Persons with AIDS (HOPWA)
- Community Development Block Grant (CDBG)
- Disaster Recovery Action Plan (CDBG-DR)
- Mitigation Action Plan (CDBG-MIT)
- Any Substantial Amendments

The design of the Citizen Participation Plan aligns with the requirements listed in the 24 CFR Part 91.105 (Citizen Participation Plan for local governments) and the HUD requirements contained in the applicable Federal Register Notices allocating funds for disaster recovery and mitigation.

## 2. GOALS

The goals of the Citizen Participation Plan are to:

1. Encourage participation in the significant planning and implementation efforts of Community Development by low- and moderate-income persons, particularly those living in blighted areas and/or disaster-impacted communities, and

persons living in proposed designated areas for CDBG, CDBG-DR, and CDBG-MIT funds.

2. Provide information and data on community needs that can be addressed by Community Development.
3. Provide community support and engagement in various projects sponsored by Community Development.
4. Provides citizens (including minorities, the disabled, and non-English speaking persons), units of local government, Tribes, Continuums of Care, organizations (including businesses, developers, nonprofit organizations, philanthropic organizations, and community-based and faith-based organizations) and other interested parties a reasonable opportunity to comment on the plan and encourages them to do so.

### 3. CITIZEN PARTICIPATION PROCESS

The Community Development Department (CD) will provide citizens and interested parties a reasonable opportunity to comment on the CPP and any subsequent substantial CPP amendments. It will make the CPP available to the public, available on its website and subsites for CDBG-DR and CDBG-MIT.

Additionally, the Citizens Advisory Committee (CAC) for Community Development will meet at the beginning of each Community Development program year. The Committee will review and evaluate the effectiveness of the Citizen Participation Plan, which will remain in effect until a new or revised plan supersedes it.

#### OPEN PARTICIPATION

1. Planning and implementation of programs at CD will be conducted openly, with freedom of access for all interested persons.
2. In the case of target-area improvement projects, such as streets or parks, target-area residents may be involved in the development and review of policy decisions regarding the design and implementation of such projects.
3. Citizens may be involved in the development of programs offered by CD, including recommending program policies and funding allocations.
4. Citizens may also participate in suggesting program improvements, and in the marketing and evaluation of CD programs.

#### LEVELS OF PARTICIPATION

There are two levels of participation in CD's citizen participation process classified as individual citizens and neighborhoods. This structure maximizes the opportunities citizens are designated to participate in CD Programs. At each level, it involves various forms of information distribution, community outreach, and public hearings/meetings to plan and implement the program.

### ***Individual Citizen Level***

Citizens have an opportunity to register comments and/or complaints by email, social media, post-mail, telephone, or in-person. A summary of comments, and a summary of any comment not accepted and subsequent reasoning, will be attached to the applicable document upon submission to HUD. CD staff will respond to all citizen comments and complaints within fifteen (15) working days of their receipt.

### ***Neighborhood Level***

Within the City there are target neighborhoods, which are the focus of CD activities. These neighborhoods are select census tracts and block groups in which over 50% of the households classify as low-to-moderate incomes.

Public meetings, outreach events, and communication efforts will be designed to encourage the participation of target neighborhoods in the planning and implementation of projects that impact them. These meetings will be widely advertised in accordance with the Citizen Participation Plan, and substantial efforts will be made to notify neighborhood residents of meetings.

## **4. ASSURANCE OF ENGAGEMENT EFFORTS**

The Community Development Department, as the lead agency for the City of Columbia HUD grants, will ensure all HUD requirements for citizen participation are met. Before the release and following the publication of any plan, the City will execute several techniques that encourage the development of a shared vision of change for the community and the review of program performance. The techniques are clarified throughout the length of the Citizen Participation Plan.

In summary, they include:

- Informational Meetings and Public Hearings.
- City Council Meetings Open to the Public and Broadcasted on the Internet.
- City Website Announcements.
- Special Mailings.
- Social Media.
- Public Advertisement in the Non-legal Section of The State newspaper (or local newspaper with general circulation).
- Posting in Conspicuous Locations that Directly and Indirectly Affect Proposed Activity.
- Formation and engagement of the Citizen Advisory Committee or Resilience Committee for Mitigation.
- Community Liaison contact for Columbia Council of Neighborhoods (CCN).

The Disaster Recovery and Mitigation Action Plans will also be supported by:

- Postings and notices on the CDBG Disaster Recovery web page and the Mitigation web page housed on the Community Development website.
- Formal invitations to key stakeholders, including any agencies whose primary responsibilities include the management of flood-prone areas, public land or water resources, and emergency management.

## **SOCIAL MEDIA DISSEMINATION**

CD will use social media to disseminate information and encourage dialog within the social media universe. CD will use the City's social media presence to increase citizen participation, while also informing the consultation process as well.

Social media offers many advantages, including low implementation costs and rapidly expanding public use. The demographic of social media users - particularly the growing digitally savvy generations - may be underserved by traditional media sources as television, radio, and print news sources.

Social media also provides grantees with a flexible, real-time tool for two-way communication with the public. Social media strategies typically involve:

- Posting citizen participation related information on a new or existing public agency social media account.
- Highlighting events and achievements by the CD department. (I.E Instagram page to highlight buildings built with CDBG funds and a Twitter feed to update people with upcoming events.)
- Creating CD email addresses (depending on the program) to increase access for submitting citizen complaints and concerns.

## **5. ACCESSIBILITY & PROVISIONS**

The City of Columbia is committed to compliance with the Americans with Disabilities Act. Persons with mobility, visual or hearing impairments requiring special accommodations, will be directed to contact the Community Development Department. Reasonable modifications and equal access to communications will be provided upon request, see chart below for contact information.

Upon advance notification, appropriate provisions will be made to accommodate persons with disabilities. Any and all reports such as the Consolidated Plan, Annual Action Plans, CDBG including CDBG-DR and CDBG-MIT Action Plans, CAPERS and substantial amendments can be made available upon request regardless of the disability.

Columbia's non-English speaking population is less than 3% (2014-2018 American Community Survey 5-Year Estimates). According to the American Community Survey, about 0.1% of the total population (127 people) speak English "not at all", while 2.8% of the total population speak English less than "very well" (3,488 people).

The City will endeavor to facilitate the translation of all program information to these residents, upon request. Translators will be present at those public hearings where a request has been made in advance by non-English speaking residents who intend to participate; see chart below for contact information.

Contact Us	Where to Reach Us
<b>By Phone</b>	<b>Community Development Phone:</b> 803-545-3373 <b>Telecommunications Relay Service:</b> 7-1-1
<b>Request via Email</b>	<b>Consolidated Plan, CAPERS, Annual Action Plan:</b> <a href="mailto:CommunityDevelopment@columbiasc.gov">CommunityDevelopment@columbiasc.gov</a> <b>CDBG-DR:</b> <a href="mailto:CityRecoveryDR@columbiasc.gov">CityRecoveryDR@columbiasc.gov</a> <b>CDBG-MIT:</b> <a href="mailto:CityMitigation@columbiasc.gov">CityMitigation@columbiasc.gov</a>

### CDBG-DR & CDBG-MIT

To ensure LEP individuals and persons with disabilities have prior notice and access to the public hearings, Community Development will take the following actions:

- Announce public hearings to organization that represent minorities and person with disabilities at least **10 business days** prior to the public hearing date(s).
- Include a statement in notices of public hearings indicating that participants in the hearings may request language interpretation to assist in their participation, via email or by phone.
- Include a statement in notices of public hearings that location of the meetings is accessible to persons with physical disabilities.
- Include a statement in notices that participants can request reasonable accommodations from the Community Development Department to participate in public meetings.
- As a CDBG grantee, the City will make a reasonable effort to translate significant documents and include a "Google Translate" on the websites to accommodate LEP communities.

## 6. AVAILABILITY TO THE PUBLIC & ACCESS TO RECORDS

The Citizen Participation Plan, the Consolidated Plan, Annual Action Plans, CAPERS, CDBG-DR Action Plan, and CDBG-MIT Action Plan are available to the public. See table below for the various formats and locations you can access or request the plans and reports.

Obtain All Plans & Reports	Locations
<b>Online, Free of Charge</b>	Community Development Website: <a href="https://columbiasc.gov/community-development">https://columbiasc.gov/community-development</a> CDBG-DR: <a href="https://dr.columbiasc.gov">https://dr.columbiasc.gov</a> CDBG-MIT: <a href="https://mit.columbiasc.gov">https://mit.columbiasc.gov</a>



<b>In-person Pick Up</b>	Community Development Department Office: 1401 Main Street, 4th Floor 8:00 a.m.- 5:00 p.m., Monday - Friday
<b>Request via Email</b>	Consolidated Plan, CAPERS, Annual Action Plan: <a href="mailto:CommunityDevelopment@columbiasc.gov">CommunityDevelopment@columbiasc.gov</a> CDBG-DR: <a href="mailto:CityRecoveryDR@columbiasc.gov">CityRecoveryDR@columbiasc.gov</a> CDBG-MIT: <a href="mailto:CityMitigation@columbiasc.gov">CityMitigation@columbiasc.gov</a>
<b>Request by Post-Mail</b>	Ship Request To: Community Development Department, 1401 Main Street, 4th Floor Columbia, South Carolina 29201

This plan provides for full and timely disclosure of program records and information consistent with applicable State and local laws regarding personal privacy and obligations of confidentiality. Documents relevant to the program shall be made available at the offices of Community Development Department, 1401 Main Street, 4th Floor, during normal working hours for citizen review upon a written public records request or by submitting an email request to [CommunityDevelopment@columbiasc.gov](mailto:CommunityDevelopment@columbiasc.gov). Such documents include the following:

- All mailings and promotional material.
- Records of hearings.
- All key documents, including all prior applications, letters of approval, grant agreements, the Citizen Participation Plan, CAPERS, other reports required by HUD, and the proposed and approved application for the current year.
- Copies of the regulations and issuances governing the program.
- Documents regarding other important program requirements, such as contracting procedures, environmental policies, fair housing and other equal opportunity requirements, and relocation provisions.

## 7. CDBG CONSOLIDATED PLAN & ANNUAL ACTION PLAN: PUBLIC NOTICE AND COMMENT PERIODS

The U.S. Department of Housing and Urban Development (HUD) requires the City of Columbia to develop a Consolidated Plan affecting all its community planning and development and housing programs. The three programs affected by the consolidated plan are: Community Development Block Grant (CDBG), HOME Investment Partnerships (HOME), and Housing Opportunities for Persons with AIDS (HOPWA).

Every five years the City of Columbia completes a Consolidated Plan for its HUD funded programs and an Annual Action Plan each subsequent year. Along with developing the Consolidated Plan, an Annual Statement of Community Development

Objectives and Projected Uses of Funds including CDBG, HOME, and HOPWA Program applications are submitted to HUD.

The benefit of having a Consolidated Plan ensures a collaborative and comprehensive process to establish a unified vision for community development actions. The citizens of Columbia are encouraged to participate in the development of the Consolidated and Annual Actions Plans.

Along with developing the Consolidated Plan, an Annual Statement of Community Development Objectives and Projected Uses of Funds including Community Development Block Grant (CDBG), Home Investment Partnership (HOME), and Housing Opportunities for Persons with HIV/AIDS (HOPWA) Program applications are submitted to HUD.

## **INFORMATIONAL MEETING**

Prior to the start of the Consolidated Plan or annual Action Plan process, the City will hold an informational meeting each year to the release of the Draft Plans which will inform the public and interested parties of the upcoming Consolidated Plan/Action Plan process.

The City will provide notice of this meeting via the following methods:

- City Website Announcements.
- Special Mailings.
- Social Media.
- Public Advertisement in the Non-legal Section of *The State* newspaper (or local newspaper with general circulation).
- Posting in Conspicuous Locations that Directly and Indirectly Affect Proposed Activity.
- Engagement with the Citizen's Advisory Committee.
- Community Liaison contact for Columbia Council of Neighborhoods (CCN).

## **CITIZEN'S ADVISORY COMMITTEE**

The City Council has appointed a Citizen's Advisory Committee for Community Development consisting of seven (7) members, one member appointed by each City Council member and Mayor, who participates in an advisory role in planning, implementing and assessing the Community Development Block Grant (CDBG), Home Investment Partnerships (HOME), and Housing Opportunities for Persons with HIV/AIDS Programs (HOPWA).

The Committee was formally established by City Council through the adoption of a resolution on August 6, 1975, which outlined the Committee's responsibilities. Both

the original Resolution and its Amendments have been included in this Citizen Participation Plan (CPP).

The Resolution's Amendment provides an opportunity for various neighborhood organizations to be represented on the CAC. Neighborhoods that meet the criteria of predominantly low- and moderate-income shall be placed on rotating list for CAC neighborhood organization appointments:

- At least 51% of the neighborhood organization's membership must qualify as very low (30-50% of the area median income) to low income (50-80% of the area median income).
- The organization must have evidence of its existence for one (1) year, including but not limited to such things as bylaws, elections, regular scheduled meetings, minutes and attendance sign-in sheets.
- The group must have official elections, which are duly advertised among the membership, and certified to be conducted with a quorum of the membership voting.
- The organization must provide the boundaries of the area represented on a legible map.
- A current roster of officers and an official membership roster must be submitted to the Community Development (CD) staff within one month after each election.

Any organization may be placed on the list of recognized neighborhood groups by providing the above information to the CD staff. Forms for groups requesting recognition are available by contacting the Community Development Department.

When new CAC members are appointed, they are provided a manual consisting of the application, federal regulations, the CP Plan and other applicable materials to inform them on the overall program. The CD staff shall provide new member orientation to review this material.

City Council has given the Citizens Advisory Committee (CAC) for Community Development the authority to carry out the following functions:

- Conduct a public hearing on the performance of the Community Development Block Grant (CDBG), Home Investment Partnership (HOME) Program, and Housing Opportunities for Persons with HIV/AIDS (HOPWA) Program, to aid in planning for the next activity year.
- Hold citywide neighborhood forums on a yearly basis, to receive input from citizens on how Community Development funds shall be spent.
- Make CAC meetings and progress reports available to the general public. Citizens and citizen organizations are encouraged to provide input on a continual basis in all areas of Community Development. Advertise public notice to allow citizens and community organizations an opportunity to assess

activities and submit comments on all aspects of the Consolidated Plan Programs. Notices will be published in local newspapers of general circulation, posted on the City's website, and through social media.

## **PUBLISHING THE PLAN WITH REASONABLE OPPORTUNITY FOR PUBLIC REVIEW**

The City will make every effort to publish the proposed Consolidated Plan in a manner that affords citizens, public agencies, and other interested community stakeholders a reasonable opportunity to examine its contents and to submit comments.

### ***Technical Assistance***

Technical assistance will be available to all individuals, groups or organizations concerning planning, implementation and assessment of the Community Development program as well as with the development of proposals for the Consolidated Plan Program funding. A workshop on all federal regulations pertaining to the operation of the Community Development Program is provided for the CAC and is open to the general public.

### ***Public Notice***

No less than **thirty (30) days** prior to the adoption of a Consolidated Plan, information will be made available to citizens, public agencies, and other interested community stakeholders. This will include information about the programs involved in the plan, including:

- How citizens are involved in an advisory role in planning, implementations and assessment.
- The amount of assistance the City expects to receive.
- The range of activities that may be undertaken, including the estimated amount that will benefit persons of low-to-moderate income.
- The plans to minimize displacement of persons and to assist any persons displaced.
- Instructions for requesting accommodations for persons with disabilities or limited English proficiency (LEP).

The City of Columbia also encourages minorities, non- English-speaking persons, and disabled citizens to participate and respond to the Citizen Participation Plan.

Input for the Annual Action Plan shall be solicited from neighborhood residents of areas designated within that program year. Designated neighborhoods may vary by inclusion or deletion, from those areas specified in the five (5) year plan. A Notice of Funding Availability (NOFA) process is utilized to solicit eligible projects and activities on an annual basis. CD staff and the Citizen's Advisory Committee (CAC) manage the NOFA process and makes recommendation for funding. Neighborhood meetings/forums are held prior to the CAC's recommendation for funding to City

Council for the Consolidated Plan and Annual Action Plan. CD staff will work with the residents in these designated neighborhoods coordinating activities and soliciting input on a continual basis.

**Please review Sections 3 and 4 of this Citizen Participation Plan for further details on the Citizen Participation Process and Assurance of Engagement Efforts.**

A summary or draft of the proposed Consolidated Plan will be advertised in a local newspaper of general circulation and on the City’s website, as well as copies of the plan will be available in Community Development, various city offices and on the City’s website. The summary or draft will include the purpose, funding amounts and description of proposed projects and activities that address the priority needs and goals of the Consolidated Plan.

A copy of the Consolidated Plan may be accessed by:

Obtain All Plans & Reports	Locations
<b>Online, Free of Charge</b>	Community Development Website: <a href="https://columbiasc.gov/community-development">https://columbiasc.gov/community-development</a>
<b>In-person Pick Up</b>	Community Development Department Office: 1401 Main Street, 4th Floor 8:00 a.m.- 5:00 p.m., Monday - Friday
<b>Request via Email</b>	Consolidated Plan, CAPERS, Annual Action Plan: <a href="mailto:CommunityDevelopment@columbiasc.gov">CommunityDevelopment@columbiasc.gov</a>
<b>Request by Post-Mail</b>	Ship Request To: Community Development Department, 1401 Main Street, 4th Floor Columbia, South Carolina 29201

**PUBLIC HEARINGS**

In compliance with Federal requirements, a minimum of **two (2) public hearings** on the Consolidated Plan at two different stages of the program year will be held to inform the citizens of eligible areas, eligible projects, and to solicit suggestions for projects to be funded in future years. Public hearings will:

1. Address housing and community development needs.
2. Development of proposed activities.
3. Review of program performance.

Public hearings will be held at a time and locations convenient to potential and actual beneficiaries. Notice of the public hearings will be published in *The State* newspaper or local paper of general circulation, on the City of Columbia’s official website and/or social media sites at least two weeks in advance of the hearing. The notice will include a description of the proposed funding programs and the projected funding levels. At least one of these public hearings will provide an opportunity for the public to give

comments on the Consolidated or Action Plan. The locations will be selected to provide access to persons with disabilities.

### **TIME PERIOD FOR COMMENTS**

Comments and input for the Consolidated Plan will be solicited through advertisements placed in local newspaper, written and/or online survey forms, community forums, social media and at public hearings. Comments will be accepted for **thirty (30) days** after the notice appears in print.

Low-and moderate-income persons, particularly those living in slum and blighted areas, residents of public and assisted housing, neighborhood organizations and agencies serving community development-eligible areas where CDBG funds are proposed to be used, will be encouraged to participate and submit comments. Their input will be solicited through neighborhood meetings, the newspaper, special mailings, city website announcements, social media and planning hearings.

Comments received in writing, or orally at public hearings, will be summarized and attached to the final Consolidated Plan.

### **SUBSTANTIAL AMENDMENTS**

A substantial amendment to the Consolidated or Annual Action Plan is an increase or decrease of over 50% of the budgeted funding amount or a change in the general activity or national objective of an activity.

In accordance with 24 CFR 91.505, other amendments to the plan shall include:

1. Making changes in allocation priorities or change in method of distribution of funds;
2. Carrying out an activity, using funds from any program covered by the Consolidated Plan, including program income, not previously described in the action plan; or
3. Changing the purpose, scope, location or beneficiaries of an activity.

There will be a thirty (30) day period to receive comments on a substantial amendment to the Consolidated Plan or the Annual Action Plan prior to the amendment being implemented. The notice of the **thirty (30) day comment period** will be issued as a legal notice of the activity printed in *The State* newspaper or local newspaper with general circulation, on the City of Columbia's website (<https://columbiasc.gov/community-development>) and/or through social media. All comments and views of citizens received in writing or via the Internet will be considered in preparation of the Substantial Amendment. A summary of these comments or views, and a summary of any comments or views not accepted and the reasons, therefore, shall be attached to the Substantial Amendment of the consolidated plan.

### **CITIZEN OBJECTION TO THE COMMUNITY DEVELOPMENT PROGRAM**

Any written complaints concerning the Community Development operations, CDBG, HOME, or HOPWA Programs will be referred to the appropriate administrator of the activity for response. A written response will be made within **fifteen (15) working days** upon receipt of complaint. A copy of the written complaint and response will be maintained by the Community Development Department, 1401 Main Street, 4th Floor Columbia, South Carolina 29201, (803) 545-3373.

Persons objecting to approval of an application for the CDBG, HOME, or HOPWA Programs, the CP Plan, environmental assessments, Consolidated Plan, or its annual performance report, CD program or performance, may present their written objection to or should make objection known to the U.S. HUD area office:

**Columbia Area Office  
U.S. Department of Housing and Urban Development  
Community Planning and Development Division  
1835-45 Assembly Street Columbia, South Carolina 29201**

## **ASSESSMENT OF PERFORMANCE**

The CAC for Community Development will assess the Annual Community Development Program, and review and measure performance based on the projects' objectives.

Performance hearing(s) shall be held by the CAC on behalf of City Council prior to the start of planning for the next program year. The purpose of the hearing is to review progress and performance of the CD Program. Citizens and citizen organizations are given the opportunity to assess and submit comments on all aspects of the Community Development's, CDBG, HOME, and HOPWA Programs. This includes assessing performance of projects and activities to determine if objectives have been achieved. The hearing is held up to three (3) months before or after the program year begins and is advertised in a newspaper of general circulation up to ten (10) days prior to the date of the hearing.

City staff and the Citizens Advisory Committee (CAC) will use citizen input in planning for the next activity year. Copies of the comments received, and summary of action taken will be distributed to the CAC and maintained on file in the Community Development Department for neighborhood organizations and the general public to review.

Citizens are encouraged to participate in the development of the Consolidated Annual Performance and Evaluation Report (CAPER). All comments submitted by citizens, along with the City's responses and a summary of any action taken will be included in the CAPER. A period of not less than fifteen (15) days is established to receive comments on performance reports before the report is submitted to HUD. This report is submitted sixty (60) days after the end of the reporting year.

## **ACCESS TO RECORDS**

Residents, public agencies and other interested parties are given reasonable and timely access to the information and records relating to the City's Consolidated Plan and use of assistance under the programs. Presentation materials, resources used to compile the information in the plan, comments compiled at public hearings, and all other related materials from previous five (5) years are available to the public upon request.

Requests may be made via email to [CommunityDevelopment@columbiasc.gov](mailto:CommunityDevelopment@columbiasc.gov).

## **USE OF CITIZEN PARTICIPATION PLAN**

The City will follow the citizen participation plan in full and to the best ability possible, as described above.

## **8. CDBG-DR ACTION PLANS: PUBLIC NOTICE AND COMMENT PERIODS**

The City of Columbia has adopted this Citizen Participation Plan to comply with the public participation requirements of Section 508 of the Housing and Community Development Act of 1974, as amended. The goal of the Citizen Participation Plan is to provide meaningful and inclusive opportunities for citizen involvement in the planning, development, and assessment of all CDBG-Disaster Recovery programs developed in response to the consequences of the 2015 Flood.

### **CDBG-DR Citizen Participation Waiver (81 FR 39693, June 17, 2016)**

Citizen participation waiver and alternative requirement. To permit a more streamlined process and ensure disaster recovery grants are awarded in a timely manner, provisions of 42 U.S.C. 5304(a)(2) and (3), 42 U.S.C. 12707, 24 CFR 570.486, 24 CFR 1003.604, and 24 CFR 91.115(b) and (c), with respect to citizen participation requirements, are waived and replaced by the requirements below. The streamlined requirements do not mandate public hearings but do require the grantee to provide a reasonable opportunity (at least 14 days) for citizen comment and ongoing citizen access to information about the use of grant funds. The streamlined citizen participation requirements for a grant under this notice is:

- Publication of the action plan, opportunity for public comment, and substantial amendment criteria. Before the grantee adopts the action plan for this grant or any substantial amendment to the action plan, the grantee will publish the proposed plan or amendment.
- The manner of publication must include prominent posting on the grantee's official website and must afford citizens, affected agencies, and other interested parties a reasonable opportunity to examine the plan or amendment's contents.



- The topic of disaster recovery should be navigable by citizens from the grantee's (or relevant agency's) homepage.
- Grantees are also encouraged to notify affected citizens through electronic mailings, press releases, statements by public officials, media advertisements, public service announcements, and/or contacts with neighborhood organizations.
- Plan publication efforts must meet the effective communications requirements of 24 CFR 8.6 and other fair housing and civil rights requirements, such as the effective communication requirements under the Americans with Disabilities Act.

## **CDBG-DR ACTION PLAN**

The City will make every effort to publish the proposed CDBG-DR Action Plan in a manner that affords citizens, public agencies, and other interested community stakeholders a reasonable opportunity to examine its contents and to submit comments.

### ***Technical Assistance***

Technical assistance will be available to all individuals, groups or organizations concerning planning, implementation and assessment of the Community Development program as well as with the development of the CDBG-DR Action Plan. A workshop on all federal regulations pertaining to the operation of the Community Development Program is provided for the CAC and is open to the general public.

### ***Public Notice***

No less than **fourteen (14) days** prior to the adoption of a CDBG-DR Action Plan, information will be made available to citizens, public agencies, and other interested community stakeholders. This will include information about the programs involved in the plan, including:

- The amount of assistance the City expects to receive.
- The range of activities that may be undertaken, including the estimated amount that will benefit persons of low-to-moderate income.
- Instructions for requesting accommodations for persons with disabilities or limited English proficiency (LEP).

The City of Columbia also encourages minorities, non- English-speaking persons, and disabled citizens to participate and respond to the Citizen Participation Plan.

### ***Citizen Participation***

The City will hold two (2) outreach events during the development of the Disaster Recovery Action Plan and during the **fourteen (14) day public comment period** to inform residents of the funding process and solicit input regarding the community's

recovery priorities. These outreach efforts will continue as recovery needs evolve and program activities are modified. Attempts will be made to reach all citizens, with emphasis on participation by persons of low-and-moderate income and residents of areas where use of funds has been proposed.

The Disaster Recovery Action Plan will be widely advertised in accordance with the Citizen Participation Plan and substantial efforts will be made to notify neighborhood residents of outreach events. Public notices regarding the Disaster Recovery program will be posted in *The State* newspaper and placed in a prominent location on the Mitigation webpage. This will include information about the programs involved in the plan, including:

- The amount of assistance the City expects to receive.
- The range of activities that may be undertaken, including the estimated amount that will benefit persons of low-to-moderate income.
- Instructions for requesting accommodations for persons with disabilities or limited English proficiency (LEP).

**Please review Sections 3 and 4 of this Citizen Participation Plan for further details on the Citizen Participation Process and Assurance of Engagement Efforts.**

In addition, Community Development will the present the CDBG-DR Action Plan to City Council for approval before submitting to HUD. The Columbia City Council meets regularly, and its meetings are open to the public and broadcast on the City Council webpage (<https://www.como.gov/council/meetings>). In addition to Council members, the public is welcome to attend in-person, ask questions, and voice concerns on matters raised in the meetings. Agendas are publicized in advance to provide broad notice of the items to be discussed.

**WEBSITE**

The City’s Disaster Recovery Action Plan and subsequent amendments will be posted in accessible formats to the City of Columbia CDBG-Disaster Recovery website (<https://dr.columbiasc.gov>) in both English and Spanish. The CDBG-DR web page is linked to the City’s main website: <https://columbiasc.gov/> and the CDBG-MIT web page: CDBG-MIT address <https://mit.columbiasc.gov>. For further information regarding the website content please see **City of Columbia’s Website Policy for CDBG-DR and CDBG-MIT**.

A copy of the CDBG-DR Action Plan may be accessed by:

Obtain All Plans & Reports	Locations
<b>Online, Free of Charge</b>	CDBG-DR: <a href="https://dr.columbiasc.gov">https://dr.columbiasc.gov</a>
<b>In-person Pick Up</b>	Community Development Department Office: 1401 Main Street, 4th Floor 8:00 a.m.- 5:00 p.m., Monday - Friday
<b>Request via Email</b>	CDBG-DR: <a href="mailto:CityRecoveryDR@columbiasc.gov">CityRecoveryDR@columbiasc.gov</a>

<b>Request by Post-Mail</b>	Ship Request To: Community Development Department, CDBG-DR Action Plan 1401 Main Street, 4th Floor Columbia, South Carolina 29201
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To promote transparency and provide the latest available information on its recovery efforts, the City will also post the following on its website:

- Action Plan and Amendments
- Program Policies and Documents
- Environmental Review Record and Public Notices
- DRGR QPR Reports
- Program Performance Reports
- Procurement Policies and Opportunities
- CDBG-DR Contracts

The City of Columbia is committed to compliance with the Americans with Disabilities Act. Persons with mobility, visual or hearing impairments requiring special accommodations will be directed to contact:

**City of Columbia Human Resources Employee Relations Officer/ADA  
Coordinator, Gardner Johnson: 803-545-4625;  
[Gardner.Johnson@columbiasc.gov](mailto:Gardner.Johnson@columbiasc.gov)  
1401 Main Street, 4th Floor  
Columbia, SC 29201**

## **SUBSTANTIAL AMENDMENTS**

As Columbia’s recovery needs change, the City may elect to update its needs assessment, modify or create new activities, or reprogram CDBG-Disaster Recovery funds. The City defines substantial amendments to the Action Plan as those that propose one or more of the following changes:

- A change in the purpose, scope, location or beneficiaries of an activity approved in the Action Plan or subsequent amendment;
- The allocation or re-allocation of more than \$1 million; or
- The addition or deletion of any allowable activity described in the approved plan.

Only substantial amendments are subject to the citizen participation process. Citizens will be provided at least **fourteen (14) days** to review and comment on all substantial Action Plan Amendments. A summary of all comments received and a response to those comments will be included in the final Substantial Amendment submitted to HUD.

## **GRIEVANCE AND COMPLAINT PROCEDURES**

It is the policy of the City of Columbia to review all complaints received. Citizens have an opportunity to register comments or complaints by email, phone, post mail, or in-person. Any written complaints concerning the Community Development operations or CDBG-DR Program will be referred to the appropriate administrator of the activity for response. A written response will be made within 15 working days upon receipt of complaint. A copy of the written complaint and response will be maintained by the Community Development Department, 1401 Main Street, 4th Floor Columbia, South Carolina 29201, (803) 545-3373.

Complaints concerning the general administration of the CDBG Disaster Recovery Program may be submitted via email ([CityRecoveryDR@columbiasc.net](mailto:CityRecoveryDR@columbiasc.net)) or

**Columbia CDBG Disaster Recovery Program  
Community Development Department  
1401 Main Street, 4th Floor  
Columbia, SC 29201**

### ***Complaint Procedures***

The following procedures will be followed on all complaints that cannot be resolved by the Disaster Recovery Manager and require additional peer review with a Grievance Committee.

1. The initial complaint must be expressed in writing.
2. The CDBG Disaster Recovery Manager will notify the Director of Community Development of the complaint, investigate the complaint, and respond in writing within 15 days.
3. If the complainant requests a peer review, the original findings will be reported to the Grievance Committee within eight (8) business days.
4. The Grievance Committee will review the complaint and notify the complainant in writing of its findings within seven (7) business days.
5. If the complainant disagrees with the Grievance Committee's findings, he/she must notify the CDBG Disaster Recovery Manager in writing that he/she desires a hearing by the Grievance Committee for review and reconsideration. The CDBG Disaster Recovery Manager will notify the complainant in writing of the hearing date.
6. The complainant must bring all relevant data, witnesses, etc., to the hearing. After the hearing, the Grievance Committee will determine, based on new information presented by the complainant, whether or not to uphold their decision. Within fifteen (15) days of the hearing, the Director of Community Development will forward the complainant a certified copy of the final decision.
7. The complainant must bring all relevant data, witnesses, etc., to the hearing. After the hearing, the Grievance Committee will determine, based on new

information presented by the complainant, whether or not to uphold their decision. Within fifteen (15) days of the hearing, the Director of Community Development will forward the complainant a certified copy of the final decision.

During application intake for CDBG Disaster Recovery funds, applicants for Disaster Recovery funds will be provided with the City's Grievance Procedures, which contain a point of contact, street address, and telephone number along with timeframes for filing a grievance. As a part of this process, applicants will be required to sign a receipt that they acknowledge and understand the grievance/complaint process. The City will provide a written response to each complaint within 15 calendar days of receiving the complaint.

All citizen or applicant grievances shall be appropriately logged and filed in a central repository for HUD review and monitoring. Additionally, a copy of the grievance and response will be maintained in the applicant's file. If the grievance has been forwarded to the city by HUD, the city's response to the grievance shall be copied to HUD and emailed to HUD's designed Disaster Recovery email address.

Persons objecting to approval of an application for the CDBG Disaster Recovery Program, the Citizen Participation Plan, environmental assessments, or program performance may present their written objection to or should make objection known to the U.S. HUD area office:

**Columbia Area Office  
U.S. Department of Housing and Urban Development  
Community Planning and Development Division  
1835-45 Assembly Street Columbia, South Carolina 29201**

### ***Grievance Committee Purpose and Responsibilities***

The Grievance Committee is comprised of three (3) persons; two (2) members of the Citizen Advisory Committee (CAC) and the CDBG Disaster Recovery (CDBG-DR) Manager or designee.

The purpose of the committee is to provide a means to respond to the concerns of CDBG Disaster Recovery Program applicants or the general public relating to Disaster Recovery activities, rules and decisions. The grievance process provides a way for an applicant's concern to be heard and responded to by a committee of peers.

#### **Committee Member Responsibilities:**

- Review applicant complaints concerning the administration of CDBG Disaster Recovery (CDBG-DR) Program.
- Know the grievance process and how it directly relates to the CDBG-DR Program.
- Review completed grievance form.
- Review logged and filed complaint, written responses, and pertinent correspondence.

- Notify complainant in writing of peer review findings within seven (7) business days of receipt.
- Participate in committee hearings if complainant disagrees with the decision
- Notify complainant in writing of scheduled hearing date.
- Listen with an open mind to the grievance presented.
- Keep information presented during the grievance hearing and subsequent discussions confidential.
- Be consistent in the way decisions are made.
- Ask appropriate questions to ensure all relevant information is presented.
- After conferring with other members of the committee, make a decision regarding the grievance.
- Take responsibility for writing the written resolution to grievance hearings.
- Committee members must remove themselves if they have a personal connection/conflict of interest with an applicant or family filing or named in the grievance.
- Committee members, with the exception of the CDBG-DR Manager or designee, will serve on a rotating basis, i.e. two (2) CAC members will be assigned to each grievance.

## **ACCESS TO RECORDS**

Residents, public agencies and other interested parties are given reasonable and timely access to the information and records relating to the City’s Disaster Recovery Program and use of assistance under the program. This plan provides for full and timely disclosure of program records and information consistent with state and local laws regarding personal privacy and obligations of confidentiality.

Program documents from the previous five (5) years will be made available for citizen review on the Disaster Recovery website and are available to the public upon request. Requests may be made via email to [CityRecoveryDR@columbiasc.gov](mailto:CityRecoveryDR@columbiasc.gov).

Such documents include the following:

- Notices and promotional material.
- Record of hearings.
- Copies of the regulations and issuances governing the program.
- Documents regarding other important program requirements, such as contracting procedures, environmental policies, fair housing, and other equal opportunity requirements.

## **USE OF CITIZEN PARTICIPATION PLAN**

The City will follow the citizen participation plan in full and to the best ability possible, as described above.

## 9. CDBG-MIT ACTION PLANS: PUBLIC HEARINGS AND COMMENT PERIODS

The City of Columbia has been allocated CDBG-MIT funds for mitigation activities to address identified risks resulting from the 2015 Federally Declared disasters (DR-4241). Activities funded with the CDBG-MIT funds must meet HUD's definition of mitigation and 50% of funds must be expended in low-to-moderate income areas. The CDBG-MIT Federal Register notice provided the waiver and requirements cited below regarding Citizen Participation for the CDBG-MIT funds.

### **CDBG-MIT CITIZEN PARTICIPATION WAIVER (84 FR 45838)**

To permit a more robust process and ensure disaster recovery and mitigation activities are developed through methods that allow all stakeholders to participate, and because citizens recovering from disasters are best suited to ensure that grantees will be advised of any missed opportunities and additional risks that need to be addressed, provisions of 42 U.S.C. 5304(a)(2) and (3), 42 U.S.C. 12707, 24 CFR 570.486, 24 § 91.105(b) and (c), and 24 CFR 91.115(b) and (c), with respect to citizen participation requirements, are waived and replaced by the requirements below. These revised requirements mandate public hearings (the number of which is based upon the amount of a grantee's CDBG-MIT allocation) across the HUD-identified MID areas and require the grantee to provide a reasonable opportunity (at least 45 days) for citizen comment and ongoing citizen access to information about the use of grant funds.

### **CDBG-MIT ACTION PLAN**

The City will make every effort to publish the proposed CDBG-MIT Action Plan in a manner that affords citizens, public agencies, and other interested community stakeholders a reasonable opportunity to examine its contents and to submit comments.

### ***Technical Assistance***

Technical assistance will be available to all individuals, groups or organizations concerning planning, implementation and assessment of the Community Development program as well as with the development of the CDBG-MIT Action Plan. A workshop on all federal regulations pertaining to the operation of the Community Development Program is provided for the CAC and is open to the general public.

## ***Citizen Participation***

The City will conduct at least one pre-draft public meeting prior to publishing the Draft CDBG-MIT Action Plan. After the draft CDBG-MIT Action Plan is posted, there will be a **forty-five (45) day comment period** and will conduct at least one public hearing in a different location of the City. These hearings will inform citizens of the funding process, risk-based needs assessment, solicit input from community members, and review potential programs. Attempts will be made to reach all citizens, with emphasis on participation by persons of low-and-moderate income and residents of areas where use of funds has been proposed.

The draft and final Mitigation Action Plan will be widely advertised in accordance with the Citizen Participation Plan and substantial efforts will be made to notify neighborhood residents of meetings. Public notices regarding the Mitigation program will be posted in *The State* newspaper and placed in a prominent location on the Mitigation webpage. This will include information about the programs involved in the plan, including:

- The amount of assistance the City expects to receive.
- The range of activities that may be undertaken, including the estimated amount that will benefit persons of low-to-moderate income.
- Instructions for requesting accommodations for persons with disabilities or limited English proficiency (LEP).

### **Please review Sections 3 and 4 of this Citizen Participation Plan for further details on the Citizen Participation Process and Assurance of Engagement Efforts.**

All plan publication efforts and public hearings will comply with civil rights requirements, including meeting the effective communications requirements under Section 504 of the Rehabilitation Act (see, 24 CFR 8.6) and the Americans with Disabilities Act (see 28 CFR 35.160); and must provide meaningful access for persons with Limited English Proficiency (LEP).

In addition, Community Development will present the CDBG-MIT Action Plan to City Council for approval before submitting to HUD. The Columbia City Council meets regularly, and its meetings are open to the public and broadcast on the City Council webpage (<https://www.como.gov/council/meetings>). In addition to Council members, the public is welcome to attend in-person, ask questions, and voice concerns on matters raised in the meetings. Agendas are publicized in advance to provide broad notice of the items to be discussed.

## **WEBSITE**

The City's Mitigation Action Plan and subsequent amendments will be posted in accessible formats to the City of Columbia CDBG-Mitigation website (<https://mit.columbiasc.gov>) in both English and Spanish. The CDBG-MIT web page is linked to the City's main website: <https://columbiasc.gov/> and the CDBG-DR web



page: CDBG-DR address <https://dr.columbiasc.gov>. For further information regarding the website content please see **City of Columbia’s Website Policy for CDBG-DR and CDBG-MIT**.

A copy of the CDBG-MIT Action Plan may be accessed by:

Obtain All Plans & Reports	Locations
<b>Online, Free of Charge</b>	CDBG-MIT: <a href="https://mit.columbiasc.gov">https://mit.columbiasc.gov</a>
<b>In-person Pick Up</b>	Community Development Department Office: 1401 Main Street, 4th Floor 8:00 a.m.- 5:00 p.m., Monday - Friday
<b>Request via Email</b>	CDBG-MIT: <a href="mailto:CityMitigation@columbiasc.gov">CityMitigation@columbiasc.gov</a>
<b>Request by Post-Mail</b>	Ship Request To: Community Development Department, CDBG-MIT Action Plan 1401 Main Street, 4th Floor Columbia, South Carolina 29201

## PUBLIC HEARINGS

The City will conduct at least one pre-draft public meeting prior to publishing the Draft CDBG-MIT Action Plan. After the draft CDBG-MIT Action Plan is posted, there will be a **forty-five (45) day comment period** and will conduct at least one public hearing in a different location of the City.

All public hearings will be held at a time and accessible location convenient to potential and actual beneficiaries, and with accommodations provided to those who request it for persons with disabilities or limited English proficiency (LEP).

The City will provide notice of meetings via the following methods:

- City Website Announcements.
- Special Mailings.
- Social Media.
- Public Advertisement in the Non-legal Section of *The State* newspaper (or local newspaper with general circulation).
- Posting in Conspicuous Locations that Directly and Indirectly Affect Proposed Activity.
- Engagement with the Resilience Committee for Mitigation (if currently activated).
- Community Liaison contact for Columbia Council of Neighborhoods (CCN).

## TIME PERIOD FOR PUBLIC COMMENTS

The City provides approximately **forty-five (45) days** to receive comments from residents and interested stakeholders on the CDBG-MIT Action Plan. During that time

period, the City schedules at least one public hearing to distribute copies of the plan and discuss the plan with the public. The public hearings give the City the opportunity to present the content of the CDBG-MIT Action Plan and receive and record comments from the public.

## **CONSIDERATION OF PUBLIC COMMENTS**

The City considers any comments or views of residents and interested stakeholders received in writing or orally at the public hearings, in preparing the final CDBG-MIT Action Plan. A summary of these comments, including those not accepted and reasons, therefore, will be attached to the final CDBG-MIT Action Plan.

## **SUBSTANTIAL AMENDMENT**

Substantial Amendments to the CDBG-MIT Action Plan will require public notice and posting on the CDBG-MIT website for **thirty (30) days for public comment**. The public notice will be made in the same manner as prescribed in this document. The thresholds for a substantial amendment are as follows:

An amendment to the CDBG-MIT Action Plan shall be considered substantial (requiring public notification and comment period) in the following events:

- A change in the purpose, scope, location or beneficiaries of an activity approved in an Action Plan or subsequent amendment;
- The addition of a covered project;
- The allocation or re-allocation of more than \$1 million; or
- The addition or deletion of any allowable activity described in the approved plan.

## **AVAILABILITY TO THE PUBLIC**

The City of Columbia will provide the CDBG-MIT Action Plan, as adopted, substantial amendments, use of funds and the performance reports to the public, including materials in a form accessible to persons with disabilities, upon request. These documents are made available to the public electronically at CDBG-MIT web page: <https://mit.columbiasc.gov>.

## **CDBG-MIT RESILIENCE COMMITTEES**

The City of Columbia will form one or more Resilience Committees for Mitigation to meet no less than twice annually to provide increased transparency in the implementation of the CDBG-MIT funds. The Committee will meet in an open forum to solicit and respond to public comment and input regarding the City's mitigation activities. The Committee will serve as an on-going public forum to continuously inform the City's CDBG-MIT projects and programs.

Notice of the Resilience Committee activities including meeting times and places, meeting materials and reports, meeting minutes, and other relevant items will be posted on the CDBG-MIT web page (<https://mit.columbiasc.gov>).

## **CITIZEN OBJECTION TO THE COMMUNITY DEVELOPMENT PROGRAM**

It is the policy of the City of Columbia to review all complaints received. Citizens have an opportunity to register comments or complaints by email, phone, post mail, or in-person. Any written complaints concerning the Community Development operations or CDBG-MIT Program will be referred to the appropriate administrator of the activity for response. A written response will be made within 15 working days upon receipt of complaint. A copy of the written complaint and response will be maintained by the Community Development Department, 1401 Main Street, 4th Floor, Columbia, South Carolina, 29201, (803) 545-3373.

Complaints concerning the general administration of the CDBG Mitigation Program may be submitted via email ([CityMitigation@columbiasc.net](mailto:CityMitigation@columbiasc.net)) or

**Columbia CDBG Mitigation Program  
Community Development Department  
1401 Main Street, 4th Floor  
Columbia, SC 29201**

Persons objecting to approval of an application for the CDBG Mitigation Program, the Citizen Participation Plan, or program performance may present their written objection to or should make objection known to the U.S. HUD area office:

**Columbia Area Office  
U.S. Department of Housing and Urban Development  
Community Planning and Development Division  
1835-45 Assembly Street Columbia, South Carolina 29201**

## **ACCESS TO RECORDS**

Residents, public agencies and other interested parties are given reasonable and timely access to the information and records relating to the City's CDBG-MIT Action Plan and use of assistance under the program. This plan provides for full and timely disclosure of program records and information consistent with state and local laws regarding personal privacy and obligations of confidentiality.

Program documents from the previous five (5) years will be made available for citizen review on the Mitigation website and are available to the public upon request. Presentation materials, resources used to compile the information in the plan, comments compiled at public hearings, and all other related materials are available. Requests may be made via email to [CityMitigation@columbiasc.gov](mailto:CityMitigation@columbiasc.gov).

## **USE OF CITIZEN PARTICIPATION PLAN**

The City will follow the citizen participation plan in full and to the best ability possible, as described above.