



City of Sandusky Citizen Participation Plan

This Citizen Participation Plan (CPP) sets forth the City of Sandusky’s policies and procedures for citizen participation for the use of Community Development Block Grant (CDBG) funds. The Citizen Participation Plan provides an opportunity for the community to work in partnership with the City to identify needs and to allocate CDBG funds.

The City of Sandusky holds the following standards regarding citizen involvement:

1. All citizen participation is to be done openly.
2. Involvement of low- and moderate-income persons, project area residents, elderly, and others is to be evident.
3. Reasonable efforts to ensure continuity of involvement of citizens throughout all stages of the CDBG program are to be evident.
4. Timely and adequate information is to be given to citizens.
5. Citizens are encouraged to submit their comments regarding the Consolidated Plan and use of CDBG funds.

While the Citizen Participation Plan will aim to ensure the participation of all residents, special assurances will be made to ensure the participation of the following groups:

- extremely low-, low-, and moderate-income persons;
- persons living in areas where CDBG funds are proposed to be used;
- residents of publicly assisted housing;
- low-income residents of target neighborhoods;
- minorities;
- non-English speaking persons; and
- persons with disabilities.
- Elderly/Frail Elderly

Definitions

For purposes of the CDBG program, the following definitions will apply:

Community Development Block Grant (CDBG): A grant program administered by the U.S. Department of Housing and Urban Development (HUD). This grant allots money to cities and counties for housing rehabilitation, affordable housing assistance, community services, and community development activities (including community facilities and economic development).

Consolidated Plan (CP): The Consolidated Plan is a three- to five-year planning document for the CDBG program. The CP must contain a housing and community development needs assessment, a three- to five-year strategic plan to address the needs identified, a one-year action plan to identify specify activities and planned use of CDBG funds. The CP is due at HUD no later than 45 days before the beginning of a program year. The City of Sandusky CDBG program begins annually on July 1st, making the CP due at HUD no later than May 15th each year.

Annual Action Plan: Each year, grantees must submit an update to HUD, referred to as an Annual Action Plan. The Annual Action Plan describes the specific planned uses for the CDBG program, as well as certain other program requirements. The Annual Action Plan is due annually at HUD no later than 45 days before the beginning of a program year.

Consolidated Annual Performance Evaluation Report (CAPER): The CAPER is an annual report summarizing the City’s progress in implementing Consolidated Plan. The CAPER is due at HUD 90 days after the close of a program year. For the City of Sandusky, each program year ends on June 30th, making the CAPER due at HUD no later than September 30th of each year.

Median Family Income (MFI): HUD surveys major metropolitan area annually to develop an index of median family income by household size.

Low- and Moderate-Income Households- Pursuant to HUD regulations, the primary beneficiaries of the CDBG program should be low- and moderate-income households, defined by HUD as follows:

- Extremely Low-Income:*** 0-30% County Median family income (MIF) adjusted for household size.
- Low-Income:*** 31-50% County MFI adjusted for household size.
- Moderate-Income:*** 51-80% County MFI adjusted for household size.

Low- and Moderate-Income Neighborhood- Generally defined as a census tract(s) of block group(s) in which a minimum of 51 percent of the residents have an income not exceeding 80 percent of the area median family income as defined by HUD.

Slum and Blighted Area- An area that meets the definition of a slum, blighted, deteriorated or deteriorating area under State or local law, typically identified as Redevelopment Project Areas,

of where a substantial number of deteriorating or dilapidated buildings or improvements are present throughout the area.

Publicly Assisted Housing Developments- Housing projects (either rental or ownership housing) developed with the assistance of public funds such as CDBG and redevelopment set-aside funds.

A. Citizen Involvement

1. Citizen Participation Plan (CPP)

The City of Sandusky recognizes that CDBG funds are tax money returned to the City to be used primarily to benefit extremely low-, low-, and moderate-income persons. City staff and officials are stewards of these public monies and will openly discuss all records, except those confidential records protecting a household's privacy. The City presents the following Citizen Participation Plan (CPP), in accordance with 24 CFR Parts 91, et al.

The Citizen Participation Plan seeks to involve the participation of citizens of Sandusky and social service agencies in the development and adoption of the Consolidated Plan, the Annual Action Plan, any substantial amendments, and the Consolidated Annual Performance Evaluation Report (CAPER). In addition, efforts will be made to focus on the involvement of low- and moderate-income persons, those persons living in slum and blighted areas, persons living in low- and moderate-income areas and persons living in areas where CDBG funds are proposed to be used. The Citizen Participation Plan consists of a number of elements designed to foster community involvement as specified in each section of the Plan.

Pursuant to HUD regulations, the City will conduct a minimum of two hearings annually at different stages in the CDBG program year (July 1 through June 30). The City will conduct public hearings at locations and at times that are convenient to the public, especially for those persons affected by program resources, and the locations will be equipped to accommodate persons with physical disabilities. As such, all public hearings and meetings will be conducted at City Hall, 240 Columbus Avenue and at The Sandusky Fire Station, 600 West Market St, Sandusky. These City Buildings are accessible facilities. If a participant will need auxiliary aids (interpreter, Braille or taped material, listening device, other) due to a disability, please contact the City a minimum of (3) days prior to the meeting.

The schedule for review and adoption of the Consolidated Plan, Annual Action Plan and Consolidated Annual Performance and Evaluation Report is as follows:

- January/February – Public Hearing to review programs and projects currently offered and funded with Community Development Block Grant funds.

- March – September
 - Public Meeting with the Consolidated Plan Advisory Committee (CPAC) to review the draft Consolidated and/or Annual Action Plan and beginning of the 30-day Public Review period.
 - Public Hearing and Adoption of the Consolidated and/or Annual Action Plan by the City Commission.
 - Submittal of the Consolidated and/or Annual Action Plan to the Department of Housing and Urban Development in Columbus, Ohio.
 - Public’s and City Commission’s review of the Consolidated Annual Performance and Evaluation Report and 15-day Public Review period.

Adoption of the Citizen Participation Plan

Prior to the adoption of the Citizen Participation Plan, implementation of the following public comment, review, and adoption procedures will ensure that all citizens have a chance to participate in the development of the Plan.

- i. The City will provide a notice of the 30-day public review period and public hearing on the Citizen Participation Plan in the *Sandusky Register* or another widely circulated publication. The notice will be printed in the *Sandusky Register* or another widely circulated publication a minimum of ten days prior to the public hearing date.
- ii. The proposed Citizen Participation Plan will be available for public review at the following locations:
 - Sandusky City Hall (240 Columbus Avenue)
 - Sandusky Library (W. Adams Street and Columbus Avenue)
 - City of Sandusky’s website at <http://www.ci.sandusky.oh.us/>

Upon request, the Plan will be made accessible to any person with disabilities. The City will provide a reasonable number of free copies of the Citizen Participation Plan to citizens and groups that request copies.

- iii. Comments of views of citizens received in writing during the public review period or orally at the public hearing will be solicited by the Sandusky City Commission.

- iv. The Draft Plan will be adopted upon a majority vote of the Sandusky City Commission at a designated and publicly noticed City Commission meeting. After adoption of the Plan, a Final Plan will be prepared. The Final Plan will include a summary of public comments and a summary of any comments not accepted and the reasons therefore, all of which will be attached to the final Citizen Participation Plan.

Amendment of the Citizen Participation Plan

The City will amend its approved Citizen Participation Plan whenever a change in the public participation process, as outlined in this plan, is proposed. An amendment to the approved Citizen Participation Plan will be reviewed and approved by the CPAC Committee to allow the public the opportunity to review and comment on the amendment. Appeals concerning the amendment should follow the appeal procedures outlined in this document. The City will provide a notice of the 30-day public review period for all proposed amendments to the approved Citizen Participation Plan.

2. Consolidated Plan (Five-Year Strategy and Annual Action Plan)

In developing the Consolidated Plan and the Annual Action Plan, the City of Sandusky is guided by two leading principals:

1. **Customer Service:** focus program efforts on the most critical needs.
2. **Comprehensive Approach:** achieve empowerment of individuals and families while ensuring long economic independence.

Inherent in these principals is extensive, relevant, and ongoing citizen participation. The City of Sandusky believes it is essential to have widespread meaningful participation throughout the planning process to ensure genuine community “ownership” of the plan.

The Consolidated Plan consists of three parts: the needs assessment, housing and community development strategic plan, and an action plan. Commonly known as the Consolidated Plan, the needs assessment and housing and community development strategic plan are updated every five years. The action plan is updated annually, reflecting annual CDBG funding allocations.

The Consolidated Plan identifies the housing and community development needs in the City, prioritizes the needs for funding, and prescribes a comprehensive strategy for addressing the needs. To maintain relevance, an Annual Action Plan is developed which includes the following elements:

- Dollar amounts proposed for each activity
- A description and location of each activity
- The entity responsible for implementation for each activity
- Time frame for each activity

In all cases, the Consolidated Plan and Annual Action Plan seek to minimize the displacement of residents from their homes or places of business.

Three groups involved in the process of Consolidated Plan and Action Plan development include:

- Consolidated Plan Advisory Committee (CPAC)
- Staff Working Group, Public Hearings – General Public
- City Commission

CPAC - the CPAC Committee is a group of Sandusky citizens appointed by the Division of Planning and City Commission, and based upon the needs of the community, to make recommendations to the Commission regarding the expenditure of HUD funds and the administration of the CDBG Program. Meetings of the CPAC are open to the public and the citizens of Sandusky are invited to attend and participate in the discussion of policy. The date, time and location of CPAC public meetings shall be advertised in the legal section of the *Sandusky Register* or another widely circulated publication, along with notices at City Hall.

The City will affirmatively publicize its activities and meetings in the local newspaper, the *Sandusky Register* or another widely circulated publication. Information may also be obtained by calling the City Planning and Development Department or the City Manager's Office.

Staff Working Group – Coordinated through the Division of Planning's Office, the working group will be comprised of representatives from the various City departments and divisions responsible for HUD-funded programs/projects, including General Services, Engineering, Recreation, Police Department, Fire Department and the City Manager's Office. The group will perform in an advisory manner to the City Commission concerning planning, implementing and assessing CDBG programs/activities through the following:

- Collecting citizen input concerning neighborhood/community needs;
- Preparing a prioritized list of neighborhood/community needs for review by the CPAC and City Commission;
- Preparing project recommendations for review by the CPAC and City Commission and for the Commission's final approval; and
- Reviewing project/program progress.

City Commission – The City Commission will fulfill its role by holding public hearings and carrying out the procedures established in this Citizen Participation Plan. The City Commission makes the final determination about the priority of various community needs that will guide the Commission when annually allocating CDBG funds in the Action Plan.

Development of the Consolidated Plan (Five-Year Strategy) and Annual Action Plan

The City of Sandusky will implement the following strategies to solicit meaningful community input in preparation of the Consolidated Plan and Annual Action Plan. Specifically, the City will:

- i. Review past year performance with the CPAC Committee and discuss priority needs for upcoming year(s).
- ii. Consult public agencies including City staff, adjacent local governments, economic development interests, and state and local health agencies.
- iii. Consult private agencies that provide health services, social services for children, elderly, disabled, homeless, persons with AIDS, victims of domestic violence, and persons with alcohol/drug abuses, etc.
- iv. Conduct at least one public meeting during the development of the housing and community development needs assessment.

Citizen participation during the development of the Consolidated Plan and Annual Action Plan will take place at the CPAC meetings, which are open to the public. The citizens of Sandusky are invited to take an advisory role in policy formation regarding program implementation by attending the CPAC meetings and making their views known. This will be made clear in all public announcements of the CPAC meetings.

Adoption of the Consolidated Plan (Five-Year Strategy) and Annual Action Plan

The following procedures will ensure that all citizens will have a chance to influence the final Plan. Specifically, the City will:

- i. Publish a notice announcing the 30–day public comment period and public hearing on the Draft Consolidated Plan and Draft Annual Action Plan. The notice will be published in the *Sandusky Register* or another widely circulated publication and will include a list of the locations where copies of the Draft Plan may be examined. The notice will be published at least ten days prior to the public hearing.

- ii. At a minimum, the Draft Consolidated Plan and Draft Annual Action Plan will be available for public review at the following locations:

- Sandusky City Hall (222 Meigs Street)
- Sandusky Library (W. Adams Street and Columbus Avenue)
- Sandusky City website at <http://www.ci.sandusky.oh.us>

Upon request, the Draft Consolidated Plan and Draft Annual Action Plan will be made accessible to any person with disabilities. The City will provide a reasonable number of free copies of the Draft Consolidated Plan and Action Plan to citizens and groups that request copies.

- iii. The City Commission will conduct a public hearing on the Draft Consolidated Plan and Draft Annual Action Plan.
- iv. At the end of the 30-day review period, the City Commission will consider adoption of the Draft Consolidated Plan and Action Plan. The Draft Consolidated Plan and Draft Annual Action Plan will be adopted upon a majority vote of the Sandusky City Commission. After adoption of the Plan, the Final Consolidated Plan and Final Annual Action Plan will be submitted to HUD. The Final Plan will include a summary of public comments and a summary of any comments not accepted and the reasons therefore, all of which will be attached to the Final Plan.

Substantial Amendments

The City may amend the adopted Consolidated Plan and/or Annual Action Plan. The following outlines the criteria and procedures to be used when amending the Consolidated Plan and/or Annual Action Plan.

Substantial Amendment Criteria

The following actions necessitate a substantial amendment to the Consolidated Plan and/or Annual Action Plan:

- A change in the use of CDBG or other HUD funds from one activity to another.
- The elimination or addition of an activity originally described in the Annual Action Plan and/or Consolidated Plan.
- A change in the purpose of an activity originally described in the Annual Action Plan and/or Consolidated Plan, such as a change in the type of activity or its ultimate objective (i.e., a change in a construction project from housing to commercial).
- A meaningful change in the location of an activity originally described in the Annual Action Plan and/or Consolidated Plan.

- A change that increases or decreases funding or the cost of an activity, project or program by more than 25% of the funds that were originally allocated for that activity, project or program as originally described in the Annual Action Plan. (This does not include activities, projects or programs that are completed under budget by more than 25%. In such cases, the unspent balance may go to existing previously approved activities.)
- A change required by Federal law or regulation.

Changes not listed above will not be considered a substantial change to the Consolidated Plan or Annual Action Plan; no formal amendment to the Consolidated Plan or Annual Action Plan requiring public review and comment will be warranted. (For example, an amendment to the Consolidated Plan is needed if the Five-Year Strategy identifies only a low priority need for historic preservation, but during the Five-Year timeframe the City decides to establish a CDBG-funded historic preservation program that amounts to more than 25% of the City's annual allocation.)

Amendment Process

The following procedures will ensure that all citizens will have a chance to comment on the proposed substantial amendment to the Consolidated Plan and/or Annual Action Plan.

- i. When necessary, a request for written concurrence is sent to the Project Manager at the Columbus Field Office for the U.S. Department of Housing and Urban Development.
- ii. Proposed amendments are reviewed by the CPAC Committee at a regular or special meeting for its recommendation to the City Commission. Publish a notice of the 30-day public comment period and public hearing on the proposed substantial amendment to the adopted Consolidated Plan and/or Annual Action Plan. The notice will be published in the *Sandusky Register* or another widely circulated publication and shall include a summary of the amendment and where copies of the proposed amendment may be examined. The notice will be published at least ten days prior to the public hearing.
- iii. The proposed amendment will be available for public review at the following locations:
 - Sandusky City Hall (240 Columbus Avenue)
 - Sandusky Library (W. Adams Street and Columbus Avenue)
 - Sandusky City website at <http://www.ci.sandusky.oh.us/>

Upon request, the amendment will be made accessible to any person with disabilities.

- iv. At the end of the 30-day review period, the City Commission will consider adoption of the amendment upon a majority vote of the Sandusky City Commission.
- v. A copy of the approved amendment will be sent to the Columbus Field Office of the U.S. Department of Housing and Urban Development.

Back-up Projects

The Annual Action Plan contains a list of projects to be funded for the program year with funding anticipated. During each program year, however, additional funding may become available as a result of program income, projects completed below budget, or projects canceled or delayed due to a variety of reasons. A list of exterior residential and commercial façade, public facility and infrastructure improvement projects will, therefore, be included in the Annual Action Plan and approved by the City Commission for funding as back-up projects. The City may activate these back-up projects at any time when funding becomes available. The City receives HUD approval for these back-up projects along with the approved and funded projects as a part of its approval for the Annual Action Plan. Initiation and funding of these projects would not constitute a “substantial amendment” defined above.

Interim Assistance Activities

Interim Assistance Activities are those immediate activities typically involving a quick repair or temporary alleviation of a sudden emergency by performing work that would otherwise be considered ineligible. There are two types of interim assistance activities.

1. Immediate Interim repairs – These activities are to prevent further deterioration of public improvements and facilities. Permanent improvements must be made as soon as practicable. Examples are: repairing streets, sidewalks, parks, playgrounds, utilities and public buildings and neighborhood cleanup programs.
2. Alleviating Emergency Conditions which threaten public health and safety – These activities require a determination by the City Manager that an emergency condition exists and requires immediate resolution. Examples include those listed above, except parks and playgrounds, and are limited to the extent necessary to alleviate the emergency.

Due to their emergent nature, interim assistance activities are exempt from the citizen participation, public hearing and legal noticing processes. The City Commission is required to document the emergency nature of these activities at the time it is asked to approve the

activity for funding. However, these projects are not exempt from Davis-Bacon wage rates. All interim assistance activities must still meet at least one of the national objectives of the CDBG Program to be eligible.

Other Emergency Projects

In accordance with HUD Memos in response to the COVID-19 Pandemic, the following waivers shall apply to adoption of the Annual Plan and amendment to the 5-Year Consolidated Plan and Citizen Participation Plan when there is a Declaration of Emergency and/or to provide expedited Disaster Response.

- i. Public Notice Period: shall be a minimum of 7 days.
- ii. Public Comment Period: shall be a minimum of 5 days.
- iii. CPAC Committee: will be provided notice of drafts of the plan and/or amendments but will not be required to meet, nor hold a public comment period, nor provide a recommendation to City Commission.
- iv. The City may utilize virtual meeting platforms, when emergency/disaster situations do not allow for public gathering.

3. Consolidated Annual Performance and Evaluation Report (CAPER)

The Consolidated Annual Performance and Evaluation Report (CAPER) details the accomplishments of the Consolidated Plan and the Annual Action Plan. The following procedures will ensure that all citizens will have a chance to comment on the CAPER.

- i. The draft CAPER will be reviewed by the CPAC Committee at one of the committee's meetings.
- ii. Publish a notice of the 15-day public comment period and public meeting on the draft CAPER. The notice will be published in the *Sandusky Register* or another widely circulated publication. The notice will include a list of locations at which the draft CAPER can be reviewed. The notice will be published at least ten days prior to the public hearing.
- iii. The draft CAPER will be available for public review at the following locations:
 - Sandusky City Hall (222 Meigs Street)
 - Sandusky Library (W. Adams Street and Columbus Avenue)
 - Sandusky City Website at <http://www.ci.sandusky.oh.us/>

Upon request, the CAPER will be made accessible to any person with disabilities.

B. Public Notification of Public Hearing

Staff will ensure adequate notice of all public hearings. Adequate noticing will include:

- Printing notices in the *Sandusky Register* at least ten days prior to the public hearings or other public meetings.
- Posting notices at City Hall (222 Meigs St.)
- Posting notices on the Sandusky City website at <http://www.ci.sandusky.oh.us>.

C. Access to Records

The City will provide citizens, public agencies, and other interested parties with reasonable and timely access to information and records relating to the Consolidated Plan documents and the use of assistance during the preceding five years.

At all times during the City Hall operating hours, all information regarding the HUD programs will be made available upon request, including the Federal Regulations governing the CDBG programs, a year-by-year breakdown of the program expenditures, the minutes of the most recent CPAC meeting, the most recent report of the program activities, records of CPAC meetings, mailings and promotional materials, prior years' applications, letters of approval from HUD, grant agreements, this Citizen Participation Plan, reports required by HUD, the current proposed application, and any other documents regarding important program requirements by HUD.

During the period of planning for the next year, information to be made available to the public will include such items as the amount of funds available to Sandusky, the range of activities that may be undertaken with these funds, the kind of activities previously funded in Sandusky, the processes involved in drawing up and approving Sandusky's application, the role of Sandusky's citizens in the CDBG programs and any other information necessary for Sandusky's citizens to participate in the process fully. Requests for information and records must be made to the City of Sandusky in writing. Staff will respond to such requests within fifteen days or as soon as possible thereafter.

D. Technical Assistance

Upon request, staff will provide technical assistance to groups representing extremely-low, low- and moderate-income persons to develop funding requests for CDBG eligible activities. Technical assistance will be provided as follows:

- i. Answer, in writing or verbally, all inquiries received from citizens or representative groups relating to funding requests.
- ii. Meet with groups or individuals as appropriate, to assist in identifying specific needs and to assist in preparing request/application for assistance.
- iii. Provide translation on an as needed basis.

E. Comments and Complaints

1. Comments

Citizens or the City government, as well as agencies providing services to the community, are encouraged to state or submit their comments in the development of the Consolidated Plan documents and any amendments to these documents. Written and verbal comments received at public hearings or during the comment period, will be considered and summarized, and included as an attachment to the final Consolidated Plan documents. Written comments should be addressed to:

City of Sandusky
City Manager's Office
240 Columbus Avenue
Sandusky, OH 44870
Attn: CDBG

A written response will be made to all written comments within fifteen working days, acknowledging the letter and identifying a plan of action, if necessary. Every effort will be made to send a complete response within fifteen working days to those who submit written comments.

2. Complaints

Citizens with complaints concerning the Consolidated Plan, the Annual Action Plan, substantial amendments and the CAPER should contact the City of Sandusky personnel by phone or in writing thirty days from the date the document is published for comment. Complaints concerning any CDBG-funded program in which the person believes access has been limited or denied, must be made within thirty days from the date of the occurrence. Staff will review each complaint based on the information provided within the complaint and provide a complete written response to citizen's complaints within fifteen working days from the date of their complaint when practicable.

The City will accept written complaints provided they specify the following:

- (1) The description of the objection, and supporting facts and data
- (2) Provide name, address, telephone number, and a date of complaint

City of Sandusky
City Manager's Office
240 Columbus Avenue
Sandusky, OH 44870
Attn: CDBG Complaint

A record will be maintained of all complaints received that will include the nature of the complaint, City investigation of facts and evidences, referrals made, and the final disposition.

Citizens may contact HUD directly if they wish to object to any part of the Consolidated Plan, Annual Action Plan or Consolidated Annual Performance or Evaluation Report, or if they feel that they have been aggrieved by any program, activity or procedure funded through the CDBG funds. Such objections should be made to: CPD Office; Department of Housing and Urban Development, Columbus Field Office, 200 N. High Street, Columbus, Ohio 43215-2463.

F. Bilingual Opportunities

Translation services will be provided upon advance request to the extent feasible. Translation services at public hearings and meetings will be provided if translation services are requested at least seven days prior to the meeting date.

G. Appeals

Appeals concerning the Consolidated Plan documents or decisions, statements, recommendations of the staff, or disposition of complaints should be made first to the Chief Planner, then to the City Manager, the City Commission, and finally to the Columbus Field Office of HUD if concerns are not answered.

H. Anti-displacement/Relocation

In the event that any residential displacement and relocation must take place in order to carry out a program activity, the City of Sandusky ensures that it will develop an Anti-displacement and Relocation Plan in connection with that project as applicable per Federal regulations.

In the event that any acquisitions and relocation must take place in order to carry out a program activity, Sandusky will also comply with the acquisition and relocation requirements of

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the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended and implementing regulations of 49 CFR Part 24.

K. Assurances

The City of Sandusky assures that the most diligent effort will be made to comply with the process and procedures outlined in the Citizen Participation Plan.