

CITIZEN PARTICIPATION PLAN

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City of Miami
Department of Community Development

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1.1 Executive Summary

The Citizen Participation Plan (“Plan”) provides a guide for City of Miami (“City”) residents to participate in an advisory role in planning, implementing, and assessing City programs funded by the U.S. Department of Housing and Urban Development (“HUD”) under the following federal entitlement grants: Community Development Block Grant (“CDBG”), HOME Investment Partnerships Program (“HOME”), American Dream Down Payment Initiatives (“ADDI”), Emergency Shelter Grant (“ESG”), and Housing Opportunities for Persons with AIDS (“HOPWA”), and any resulting program income.

The goal of the Plan is to encourage public participation; therefore, the Plan sets forth the jurisdiction’s efforts to foment and stimulate citizen involvement in its planning process.

This Plan focuses on:

- Increasing public participation;
- Encouraging a diverse representation of City residents, including minorities, non-English speaking individuals, and persons with disabilities, to advise the City while developing the five-year Consolidated Plan, annual Action Plans, amendments to any of such plans, and Consolidated Annual Performance & Evaluation Reports (“CAPER”);
- Involving low- and moderate- income residents, especially those living in slum or blighted areas, and in areas where the use of CDBG funds are proposed to be utilized;
- Receiving comments, views, or complaints from residents;
- Reducing public isolation from government.

The City is committed to seeking a balanced strategy that encourages citizen participation. City residents are encouraged to attend public hearings and provide comments to assist the City identify the most important housing and non-housing community development needs of low- and moderate- income persons.

Opportunities for public comment shall be provided throughout the development of the five-year Consolidated Plan, annual Action Plans, amendments to such plans, and CAPER. The City’s five-year strategic Consolidated Plan, which is updated on a yearly basis by the Action Plan, provides a combined planning and reporting document which presents goals and strategies developed as a result of citizen involvement.

City residents and organizations can submit comments and views regarding City programs in the following manner:

- verbal comments may be made during scheduled public hearings, and
- written comments may be submitted directly to the Department of Community Development (“DCD”), during the official comment period, by following the instructions provided on the Public Notice (refer to sub-section 1.2.2).

The City considers all comments and views of City residents when preparing the final five-year strategic Consolidated Plan, annual Action Plans and amendments to such plans. A summary of these comments and views and a brief summary of any comments and views not accepted, and the reasons therefore, shall be attached to the final version of the five-year strategic Consolidated Plan or annual Action Plans.

Copies of the most recent Plans shall be available at no charge at the DCD website.

1.2 Public Hearings

The primary purpose of public hearings is to obtain public comments and views on local community needs. Public hearings shall be the primary setting to facilitate citizen participation and shall mainly address housing and community development needs. City residents are encouraged to verbally share their comments and views and, in general, to participate in this critical component of the City’s overall planning process. There shall be at least two categories of public forums:

- a) Neighborhood-level public hearings;
- b) Public hearings held before the City Commission and/or before the Housing and Commercial Loan Committee.

Public hearings at the neighborhood level shall be held at times and locations appropriate for City residents and shall consist of at least one public hearing per commission district. Public hearings may be held during certain City Commission meetings to address housing and community development needs as well as to gather citizens’ views regarding proposed funding allocations for social, economic development, and other activities under the CDBG, ESG, HOME, ADDI, and HOPWA programs. Public hearings also may be held during certain Housing and Commercial Loan Committee meetings to address matters specific to housing and commercial projects.

Table 1.2.A – Public Hearings

Action/ Document	Public Hearing Required?
Needs Assessment and Strategy (Neighborhood-level) <i>At least one public hearing per Commission district and at least two public hearings for the HOPWA program on an Annual Basis.</i>	Yes
Five-year Consolidated Plan/ Annual Action Plan and/or substantial Amendments	Yes
Consolidated Annual Performance and Evaluation Report	Yes
Fair Housing Plan (Analysis of Impediments) <i>Hearings can be combined with the public hearings for the five-year Consolidated Plan</i>	Yes
Citizen Participation Plan	No

Public hearing locations shall be accessible to persons with disabilities. In addition, upon request or in the event that the City anticipates the attendance of a significant number of non-English speaking persons, the City shall take reasonable steps to arrange, if necessary, the presence of an interpreter. The City will also make reasonable efforts to make other special accommodations, as requested by citizens, in response to a Notice of Public Hearing.

1.2.1 Public Notice – Advertising of Public Hearings

Public Hearings allow citizens the opportunity to provide verbal comments and views on community needs. HUD considers two weeks advance public notice to be adequate. The City shall; therefore, provide public notices at least 14 calendar days¹ prior to the public hearing dates. Public Notices shall be published as follows:

- in one or more general circulation newspapers;
- at least fourteen (14) calendar days prior¹ to the public hearing dates;
- the notice may be drafted in the language(s) spoken by a representative section of the citizens impacted, as determined by the DCD;
- the notice shall include the place, date, time, and purpose of the hearing, how interested persons can receive more information about the items to be discussed and how to submit written comments during the period preceding the public hearing;
- the notice shall include information on how to request special accommodations, including sign language translators for people with disabilities. All requests for special accommodations shall be received, in writing, at least three (3) business days prior to the hearing.

1.2.2 Public Notice - Advertising of Comment Periods

Comment periods allow citizens the opportunity to provide written comments and views on community needs. The advertising of comment periods may be included in notices of public hearing. Comment periods shall be published as follows:

- shall be published, in advance, to meet the comment period criteria in accordance to table 1.2.2.A;
- in one or more general circulation newspapers;
- in the event that the document or item requires a public hearing, the comment period shall end prior to the day of the public hearing;
- the notice shall include a brief summary of the item, the commencement and ending dates of the comment period, information on how to submit written comments, the item's purpose, the location of the item for public review, and if applicable, the date the proposed item will be presented to City Commission for approval;
- the notice may be drafted in the language(s) spoken by a representative section of the citizens impacted.

¹ If a comment period is also required, the public notice shall be advertised following the timeframe in table 1.2.2.A.

The City shall provide advanced public notice to allow City residents the opportunity to provide written comments on any of the following documents:

Table 1.2.2.A – Public Notice Comment Period Requirements (calendar days)

Document	Comment Period
Proposed five-year Consolidated Plan and/ or substantial amendments*	30-day
Proposed annual Action Plan and/ or substantial amendments*	30-day
Proposed Consolidated Annual Performance and Evaluation Report	15-day
Proposed Fair Housing Plan (Analysis of Impediments)*	30-day
Citizen Participation Plan & substantial amendments	15-day

**Following the comment period, a final version of this item will be submitted to City Commission for Approval.*

1.2.3 Citizen Comments and Response to Inquiries

Any comments or views may be directed, in writing, to the City of Miami, Department of Community Development at 444 SW 2nd Avenue, 2 Floor, Miami, FL 33130; Attn: Assistant Director, Programs & Reporting Division.

Any written inquiry received from a citizen related to the Consolidated Plan, annual Action Plan, Citizen Participation Plan, Fair Housing Plan, CAPER or any amendments to any of the mentioned plans shall receive a written response from the DCD within fifteen (15) working days from the date comments were received.

1.2.4 Public Access to Information

The DCD shall provide citizens, public agencies, and all interested parties with reasonable and timely access to information and records. The following documentation shall be made accessible:

- Proposed and final five-year Consolidated Plans;
- Proposed and final annual Action Plans;
- Consolidated Annual Performance and Evaluation Report;
- Citizen Participation Plan;
- Fair Housing Plan (Analysis of Impediments);
- Any amendments to the above mentioned documents.

All documents are available for review during normal business hours at the DCD, located at 444 SW 2nd Avenue, 2 Floor, Miami, FL 33130. The City may charge a fee for copies to recover the cost of materials. The City may require an appointment to review records and may require a City employee to be present during the inspection of records. Audio recordings of public hearings may be obtained, for a fee, by calling the Office of the City Clerk at (305)250-5360. Any comments or views shall be directed, in writing, to the City of Miami, Department of Community Development at 444 SW 2nd Avenue, 2 Floor, Miami, FL 33130; Attn: Assistant Director, Programs & Reporting Division.

1.3 Technical Assistance

DCD staff shall provide technical assistance to City residents in an effort to enable them to adequately and intelligently participate in the planning process. DCD staff shall provide technical assistance to groups representing low- to moderate- income residents who request such assistance in developing proposals for funding assistance. Technical assistance shall be provided as follows:

1.3.1.A. - Informational and Training Session(s)

At least one training session shall be provided for interested persons, not-for-profit organizations and groups. The purpose of this session is to describe the allocation process and funding cycle, instruct attendees on how to develop a complete and competitive application for funding assistance and to answer any questions or concerns those in attendance may have.

1.3.1.B. - Technical Assistance to Interested Individuals/ Groups

DCD staff is available throughout the year to answer inquiries from persons interested in submitting proposals for any DCD program subsidized through HUD formula grants.

1.4 Anti-Displacement and Relocation Plan

The City shall attempt to minimize the involuntary and permanent displacement of residents as a result of federally assisted projects. The City's federal funded programs are operated under a Residential Anti-Displacement and Relocation Assistance Plan as required by HUD. A copy of this plan is available for review at the DCD.

The City shall provide relocation assistance to each low- to moderate- income household displaced by the demolition of housing or by the conversion of a low- to moderate- income dwelling to another use as a direct result of assisted activities. Relocation benefits consistent with HUD regulations shall be offered to those displaced.

1.5 Citizen Participation Plan Process

The Plan was drafted in accordance to 24 CFR 91.105 and shall be reviewed and updated on an as needed basis. Amendments to the Plan shall either be substantial or administrative in nature and based on the type of amendment required, the process to incorporate such amendment may differ.

1.5.1 Substantial Amendments to the Citizen Participation Plan

City residents will be provided with an opportunity to comment on substantial amendments to the Citizen Participation Plan. Substantial amendments shall be available for public review for a period of no less than 15 days prior to its submission to HUD. Please refer to sub-section 1.2.2 and table 1.2.2.a.

Substantial amendments to the Citizen Participation Plan are defined as:

- a) any reduction in citizen comment period for the Consolidated Plan/ Annual Plan;
- b) any change that would restrict or lessen the possibilities of citizen participation as provided in the Plan.

A draft of the Citizen Participation Plan will be available for public review in the DCD during regular business hours throughout the comment period and at DCD's website. A summary of the comments or views not accepted and the reasons, therefore, will be attached to the final version of the Citizen Participation Plan.

1.5.2 Non-Substantial Amendments to the Citizen Participation Plan

Changes required to comply with minimum HUD requirements shall not be considered substantial amendments, and therefore, will be incorporated administratively.

1.6 Consolidated Planning Process

1.6.1 Development of a 5-Year Needs Assessment and Strategy

Once every 5 years, the City works with elected officials, community leaders, community groups, and City residents to develop a comprehensive five-year Consolidated Plan which creates a cohesive strategy for the revitalization of City communities. Neighborhood level public hearings² shall be held in each commission district to encourage citizen participation in identifying community needs.

1.6.2 Development of the Five-Year Consolidated Plan and/ or Annual Action Plan

Once every 5 years, following public hearings a draft of the five-year Consolidated Plan as well as a draft of the annual Action Plan³ shall be developed incorporating citizen comments and recommendations. City residents are encouraged to review these drafts and offer additional comments, views, and/ or suggestions either verbally or in writing. Please refer to section 1.2.

² Neighborhood level public hearings shall be held on a yearly basis; thereafter, to draft the annual Action Plan until the next Consolidated Plan is due.

³ The Action Plan document shall be drafted on a yearly basis.

1.6.2.A - Consolidated Plan/ Annual Action Plan Public Notice - Comment Period

The comment period for the Consolidated Plan/ annual Action Plan shall be in accordance to section 1.2. Following the ending of the public review and comment period, a final version of the Consolidated Plan/ annual Action Plan shall be submitted to City Commission for approval. The final version of either plan shall be available for public review in accordance to section 1.2.

1.6.3 Substantial Amendments to the Consolidated Plan and/or Annual Action Plan

Following the submission of the five-year Consolidated Plan, the City shall monitor the progress of each strategic objective in order to optimize the investment of resources in the community. Substantial amendments are subject to the citizen participation process. For a proposed change to be a substantial amendment, at least one of the following circumstances must be present:

- A change in the use of funds from one eligible activity to another (i.e., from an economic development activity to a housing development activity);
- Addition of a program or activity not previously described in the Consolidated Plan (or in the annual Action Plan);
- Elimination of a program or activity previously described in the Consolidated Plan (or in the annual Action Plan);
- A change in the allocation of CDBG program funds that exceeds the greater of,
 - 2.5% of the annual CDBG entitlement for the current fiscal year; OR
 - \$200,000;
- A change in the allocation of HOME/ ADDI program funds that exceeds the greater of;
 - 5% of the annual HOME/ ADDI entitlement for the current fiscal year; OR
 - \$200,000;
- A change in the allocation of HOPWA program funds that exceeds the greater of;
 - 2.5% of the annual HOPWA entitlement for the current fiscal year; OR
 - \$250,000;
- A change in the allocation of ESG entitlement funds that exceeds \$35,000.

All of the above mentioned actions require a public hearing and a comment period. Please refer to sections 1.2.1 and 1.2.2 for further details.

1.6.3.A - Submission of Substantial Amendments to HUD

On a quarterly basis or as deemed appropriate, the City shall submit to HUD a comprehensive report outlining substantial amendments incorporated into the Consolidated Plan through, in many instances, direct amendments to the City's annual Action Plan. Such report shall summarize the changes previously approved by the City Commission or the Housing and Commercial Loan Committee.

1.6.4 Non-Substantial Amendments to the Consolidated Plan and/or Annual Action Plan

Non-substantial amendments are not subject to the citizen participation process. The following changes shall not be considered substantial amendments:

- A change in purpose, scope, location, and/or beneficiaries of an activity (same activity);
- A change of matrix code without changing the use of fund from one eligible activity to another (i.e., change from a public service matrix code to serve the elderly to a public service matrix code to serve the youth);
- A change in the City’s allocation priorities or a change in the method of distribution of funds;
- Changes arising from urgent needs due to emergency or disaster situations;
- Allocation of program funds earmarked for down payment assistance to beneficiaries purchasing affordable housing.

1.6.5 Consolidated Plan Schedule – At a Glance

The following is the consolidated planning schedule:

1. Meet with other City Departments to address community needs;
2. Advertise neighborhood level public hearings;
3. Neighborhood level public hearings take place;
4. Review citizens’ verbal comments and views;
5. Request for Proposals issued, if applicable;
6. DCD provides funding recommendations to City Commission;
7. Draft proposed five-year Consolidated Plan and annual Action Plan;
8. Advertise the comment period and public hearing for the proposed Consolidated Plan and annual Action Plan;
9. Citizen comments incorporated into the Consolidated Plan and/or annual Action Plan, whenever appropriate;
10. Final versions of the Consolidated Plan and annual Action Plan are presented to the City Commission for approval to submit to HUD.

1.7 Annual Action Plan Process

The annual Action Plan is developed in accordance with sub-sections 1.6.1 through 1.6.4. Note that sub-section 1.6.1 directly relates to the development of the Consolidated Plan; however, the neighborhood public hearings also apply to the development of the annual Action Plan.

1.7.1 Annual Action Plan Schedule – At a Glance

The following is the annual Action Plan schedule:

1. Advertise neighborhood level public hearings;
2. Neighborhood level public hearings take place;
3. Review citizens’ priorities, comments, and views;
4. Request for Proposals issued, if applicable;
5. DCD provides funding recommendations to City Commission;
6. Draft a proposed annual Action Plan;
7. Advertise the comment period and public hearing for the proposed annual Action Plan;
8. Citizen comments incorporated into the annual Action Plan, whenever appropriate;

9. Final version of the annual Action Plan is presented to City Commission for approval of submission to HUD.
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1.8 Housing Opportunities for Persons with AIDS Program

The City receives and administers the Housing Opportunities for Persons with AIDS funds for all of Miami-Dade County. The City shall schedule at least two (2) neighborhood-level public hearings outside the City limits to solicit input and comments from residents of Miami-Dade County.

These hearings shall be conducted according to section 1.2 and proper notice shall be provided in accordance to sub-section 1.2.4. Public comment shall be solicited and considered during the thirty day comment period as well as during the public hearing.

The City will provide at least one training for interested individuals, not-for-profit organizations and groups in Miami-Dade County relative to the planned use and utilization of HOPWA program funds in conjunction with the release of RFPs. In addition, the DCD will provide technical assistance to interested parties throughout the year.