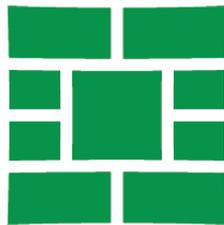


CITY OF SAVANNAH, GEORGIA
CITIZEN PARTICIPATION PLAN



SAVANNAH

savannahga.gov

Effective April 29, 2020

CITY OF SAVANNAH, GEORGIA
HOUSING AND COMMUNITY DEVELOPMENT PLAN
CITIZEN PARTICIPATION PLAN
Effective April 29, 2020

BACKGROUND AND PURPOSE

Savannah's Housing and Community Development Plan (HCD Plan) addresses the City's housing, homelessness, and non-housing community development needs over a five-year period. The HCD Plan is divided into two components: a five-year Strategic Plan which contains the plan's broad goals and specific objectives, and a One-Year Action Plan which identifies the activities to be undertaken in the current fiscal year to implement the longer-range Strategic Plan. The One-Year Plan identifies how federal funds allocated to the City will be spent that year to achieve the objectives set out in the Strategic Plan. The federal fund allocations that are identified in the One-Year Plan are Community Development Block Grant (CDBG) funds, Emergency Solutions Grant (ESG) funds, and HOME Investment Partnerships (HOME) funds. One-Year Action Plans are developed and adopted every year.

The purpose of the HCD Citizen Participation Plan is to facilitate public participation in the development and implementation of the City's Housing and Community Development Plan, including the One-Year Action Plan. The Citizen Participation Plan (CPP) is designed to:

- encourage persons with low- and moderate-incomes and persons living in blighted and/or low- and moderate-income neighborhoods to participate in the development and revision of the Strategic Plan and in the preparation of the One-Year Action Plan;
- encourage persons of all races and ethnic backgrounds to participate in the HCD planning process;
- encourage residents of Housing Authority of Savannah neighborhoods to provide input in the HCD Plan; and
- encourage local residents with disabilities or special needs to participate in the planning effort.

HCD TECHNICAL COMMITTEE

The HCD Technical Committee will be established to oversee participation of the HCD Plan. The Committee is comprised of representatives of social service agencies, housing providers, agencies serving the homeless, and neighborhood organizations.

The HCD Technical Committee will meet to assist the City of Savannah in developing the Consolidated Plan and assisting with revising the document, when necessary. All meetings of the HCD Technical Committee will be open to the public. Notice of meetings will be mailed to Committee members at least seven days before the meeting and posted on City of Savannah's Human Services Department website at <http://savannahga.gov/481/Human-Services>.

COMMUNICATION WITH THE PUBLIC

Various media and methods of communication will be used to inform the public about the HCD Plan, including the One-Year Action Plan, and about the opportunities to involve themselves in its planning, implementation, and evaluation. A special emphasis will be placed on soliciting input and participation from people who live in blighted and/or low- and moderate-income neighborhoods, including Housing Authority of Savannah neighborhoods. Methods of communication may include:

- City of Savannah's website at <http://savannahga.gov> and Human Services Department website at <http://savannahga.gov/481/Human-Services>
- mailing to presidents of neighborhood associations;
- mailing to other individuals and organizations likely to be concerned;
- providing timely information to local news media and encouraging media comment;
- providing information in public libraries;
- publication of leaflets and brochures;
- meetings with neighborhood groups; and
- staff contacts with individual households.

The City's neighborhood planning effort will serve as an ongoing method of involving and communicating with the public on local housing and community development needs. The Housing and Neighborhood Services Department (HNS) is currently involved in planning efforts in low-/moderate-income neighborhoods. The neighborhood planning process involves regular meetings with neighborhood leaders, usually as part of a formal Neighborhood Plan Steering Committee. Residents assist in identifying neighborhood needs and in developing strategies to address those needs. There is a continuous exchange of information between the comprehensive HCD Plan and area-specific neighborhood plans. Relevant objectives of the HCD Plan are incorporated in an appropriate format into neighborhood plans. Similarly, neighborhood plans have been and will continue to be used in the HCD planning process as a source for information on neighborhood needs.

The purpose of media coverage and other public information efforts is to generate interest and input into the HCD planning process. Human Services Department staff will serve as the contact point for individuals and groups concerned with the HCD Plan and the allocation of federal housing, homeless, community development, and economic development funds. Human Services Department staff will provide technical assistance to groups representing low- and moderate-income residents who request help in developing proposals for funding under the One-Year Action Plan.

PUBLIC HEARINGS

During each fiscal year, the City will hold two public hearings on the HCD Plan to obtain citizen input. Each hearing will be advertised at least ten days in advance in the Savannah Morning News, the newspaper of general circulation in the area, and the City of Savannah's Official Government Web Site at www.savannahga.gov. Letters informing the public of the hearings will also be mailed to various neighborhood groups and housing and social service agencies. Access for persons with disabilities will be provided at all public hearings. Translations for non-English speaking persons and interpretation for the deaf will be provided upon request.

The first public hearing will be held in May. This hearing will usually be held on a weekday evening after regular business hours. During this hearing, the public will be informed about the process for allocating federal funds through the CDBG Program, the ESG Program, and the HOME Investment Partnerships Program. Past and current projects funded under these programs will be discussed and citizen comments and proposals for future projects will be solicited. The notice of this hearing will include a summary of the hearing agenda. Application forms for CDBG and ESG grants will be distributed at this hearing.

The second public hearing will be conducted in October or November as part of a City Council meeting. These meetings are usually held on Thursdays at 2:00 PM in the Council Chambers in City Hall. The purpose of the hearing will be to seek input on the draft HCD plan, including the One-Year Action Plan with allocations for the spending of federal HUD entitlement funds. Citizens will be offered the opportunity to comment on the housing and community development needs identified in the Plan, including priority non-housing and community development needs. The notice of this public hearing will contain a summary of the HCD Plan, including its purpose, a description of the Plan's contents, and a list of the core goals of the plan. The hearing notice will list the locations where copies of the entire plan may be examined and will identify:

- the amount of federal funds likely to be available to implement the plan;
- the amount of program income likely to be available to implement the plan;
- the range of activities that may be undertaken with these funds;
- the estimated amount of funds proposed to be used for activities that will benefit low- and moderate-income persons;
- any proposed activities which are likely to result in displacement of people from their homes or businesses; and
- the types and level of assistance the City will provide to persons displaced by federally-funded activities.

The public will have a 30-day period after publication of the hearing notice to submit comments on the draft plan. These comments can be in writing, or given verbally at the second public hearing, or given to a Human Services staff member over the phone. The City will respond to every written adverse comment or suggestion for improvement it receives on the HCD Plan during the 30-day comment period. The response will be in writing and will be made within 15 working days of

receipt of the complaint.

The final HCD Plan will consider all comments received on the Plan and on the proposed use of funds. A summary of citizen comments, including comments or views not accepted and the reasons therefore, will be included in the appendix of the HCD document.

For CDBG, ESG and HOME funding under FY 2019 and FY 2020, and the Coronavirus Aid, Relief, and Economic Security (CARES) Act, the city will provide a 5-day notice/comment period of a proposed off-cycle change effective April 29, 2020 as allowed under a HUD waiver. This includes any new activities proposed.

Alternative Public Hearings during Emergency/Disaster Declaration

It may be necessary to host alternative public hearing on the consolidated or action plan in the event of a declared disaster or emergency. The City will meet the public hearing requirements with virtual public hearings if national/local health authorities recommend social distancing and limiting public gatherings for public health reasons. Attendance at these hearings maybe online or telephonic. Additionally, reasonable notification will be provided for virtual hearings, at least (7) days prior to event along with access information for citizens. Local officials will timely respond to all citizen questions and issues; and public access will be available for all questions and responses.

TECHNICAL ASSISTANCE

The City will provide technical assistance to groups representing persons of low- and moderate-income living in the CDBG target area. The City will provide technical assistance to groups related to any of the programs covered by the HCD Plan. Assistance may include demographic information and assistance with developing proposals for funding. The assistance need not include provision of funds to the groups.

COMMUNITY OUTREACH COORDINATORS

The City has six Community Outreach Coordinators. Their role is to perform street-level outreach within CDBG neighborhoods to inform citizens in local planning efforts, housing improvement, economic development, poverty reduction and other federally funded human services activities according to CDBG regulations.

Community Outreach Coordinators will assist the city in meeting two citizen participation CDBG regulations. The first 570.206 (b) works to ensure citizens have access to the CDBG process and assisted with any questions they might have about the use of federal funds. The second regulation 570.431 discusses the citizen participation plan requirements. Community Outreach Coordinators help implement the citizen participation plan when the City is in its CDBG process.

COMPLAINTS

The City will provide a timely, substantive written response to citizens who have made written complaints related to the consolidated plan, amendments, and performance report. The City will provide written responses within 15 working days of receiving the complaint.

PLAN AMENDMENTS

Citizens will be given an opportunity to comment on substantial amendments to the HCD Plan. “Substantial amendments” are those that:

- add or delete a goal in the current Plan;
- delete a program proposed for funding in the amount of \$300,000 or more in the current One-Year Action Plan section of the HCD Plan;
- add any CDBG, ESG, or HOME project whose funding will be greater than 25% of the current year’s One-Year Action Plan relevant entitlement grant; and/or
- substantially change the purpose, scope, location, or beneficiaries of a program funded in the current One-Year Action Plan.

A variation in funding of \$300,000 or more of a program’s budget will be considered to be a “substantial change” and will require public notice.

Proposed amendment(s) to the HCD Plan will be advertised in the Savannah Morning News, and the Human Services Department’s Website at <http://savannahga.gov/481/Human-Services>, and citizens will be offered a period of 30 days in which comments on the amendment will be received and considered. The City will respond to every written adverse comment or suggestion for improvement it receives on the proposed amendment during the 30-day comment period. This response will be in writing and will be made within 15 working days of receipt of the complaint.

The final plan amendment(s) will consider all comments received on the proposed amendment(s). A summary of citizen comments, including comments or views not accepted and the reasons therefore, will be attached to the plan amendment. The amendment will not be implemented until the 30-day comment period has ended unless it is essential to the public interest or to avoid hardship to individuals that implementation start earlier. In such cases, the U.S. Department of Housing and Urban Development’s waiver of the 30-day period will be sought.

Expedited Plan Amendments (Disaster/Emergency)

It may be necessary to expedite substantial amendments to the Consolidated Plan in the event of a declared disaster or emergency. These expedited substantial amendments may include funding new activities and/or the reprogramming of funds including canceling activities to meet needs resulting

from a declared disaster or emergency. Therefore, the City may utilize CDBG, HOME, or ESG funds to meet these needs with a 5-day public comment period instead of a 30-day public comment period, which is otherwise required for substantial amendments.

For CDBG, ESG and HOME funding under FY 2019 and FY 2020, and the Coronavirus Aid, Relief, and Economic Security (CARES) Act, the City of Savannah may provide a 5-day notice of a proposed off-cycle change or substantial amendments effective April 29, 2020 as allowed under a HUD waiver.

Special ESG funding under the CARES Act referred to as ESG-CV to address the COVID-19 pandemic do not apply to citizen participation requirements that would otherwise apply to ESG funds; however, the City will publish how the ESG-CV funding has or will be used on the City of Savannah website at <http://savannahga.gov/481/Human-Services>.

PERFORMANCE REPORTS

Performance reports on the HCD Plan will be prepared on an annual basis. A draft report will be prepared by Human Services staff and a notice of the availability of this report will be advertised in the Savannah Morning News and on the Human Services Department's Website at <http://savannahga.gov/481/Human-Services>. Citizens will be offered a period of 15 days to comment on the Annual Performance Report. The City will respond to every written adverse comment or suggestion for improvement it receives on the Performance Report during the 15-day comment period. This response will be in writing and will be made within 15 working days of receipt of the complaint.

The final HCD Annual Performance Report will consider all comments received on the proposed Report. A summary of citizen comments received on the Report will be included in the document as an attachment.

ANTI-DISPLACEMENT PLAN

The City's Anti-displacement and Relocation Plan is attached to this plan as an appendix.

AVAILABILITY OF DOCUMENTS

Copies of current and proposed HCD plans, substantial amendments to the Plan, and Annual Performance Reports will be available for public view at the Human Services Department offices located at 1375 Chatham Parkway in Savannah. Data and other materials relevant to preparation of the HCD Plan will also be available for public inspection in the Human Services Department. Office hours are 8:15 a.m. to 5:00 p.m., Monday through Friday.

Copies of draft and adopted documents will be mailed to interested persons upon request. Planning materials will be made available in a form accessible to persons with disabilities upon request.

APPENDIX

CITY OF SAVANNAH, GEORGIA

**ANTI-DISPLACEMENT PLAN
(Revised 4/2020)**

**CITY OF SAVANNAH, GEORGIA
ANTI-DISPLACEMENT PLAN**

The City developed its Anti-Displacement Plan as a guide to help project planners and housing staff in developing projects in the local community. The purpose of the plan is to minimize unnecessary displacement and ease the burden of relocating eligible home owners, tenants, and businesses. The Anti-Displacement Plan consists of the three following strategies:

I. Providing for one-for-one replacement

The City will replace all occupied and vacant (and acceptable for occupancy) low-to-moderate income dwelling units demolished, or converted to a use other than as low-to-moderate income housing, as a direct result of activities assisted with funds provided under the Housing Act. Replacement units may include public housing or existing housing receiving Section 8 project-based assistance. All replacement housing will be provided within three years of the start of the demolition or conversion work and will meeting the following requirements:

§ the units will be located within City

§ the units will be sufficient in number and size to house adequately at least the number of people that could have been housed in the demolished or converted units, and will be in standard condition

§ the units will be designed to remain low-to-moderate-income dwellings for at least 10 years from the date of initial occupancy

Before obligating or expending **CDBG** funds that will directly result in such demolition or conversion, the City will make public the following information:

§ A description of the proposed activity;

§ The general location on a map, and approximate number of dwelling units by size (number of bedrooms) that will be demolished or converted;

§ The source of funding and time schedule for providing replacement units;

§ A time schedule for the demolition/conversion;

§ The general location on a map and approximate number of dwelling units by size that will be provided as replacement units;

§ The source of funding and time schedule for providing replacement units;

§ The basis for concluding that each replacement dwelling unit will remain a low-to-moderate income dwelling unit for at least 10 years.

The basic concept behind “one-for-one replacement” is to ensure that the City’s stock of affordable housing is not reduced.

II. Providing relocation assistance to eligible persons

The Uniform Relocation and Real Property Acquisition Policies Act of 1970 (URA), as amended and Section 104(d) of The Housing and Community Development Act of 1974, as amended governs the assistance provided to eligible persons. Below summarizes eligibility and the assistance offered when a person is involuntarily displaced by **CDBG** activities or other federally-assisted programs.

When displacement is necessary to complete a project successfully, the City will provide relocation assistance to eligible displaced persons that include:

- § *Tenants who have occupied their dwelling for at least 90 days before the “initiation of negotiations” or Code Enforcement action.*
- § *Homeowners who have owned and occupied their dwelling for at least 180 days before the “initiation of negotiations”.*
- § *Displaced persons who have occupied their dwelling for less than 90 days before the “initiations of negotiations” the City will provide assistance per section 206 of the URA.*
- § *Businesses who have occupied their premises for at least 90 days before the “initiation of negotiations.”*

The “initiation of negotiations” is the date the City offers to buy the property, or issues a notice of intent to buy, or approves an application for a loan or grant for rehabilitation. Occupants who do not meet these requirements may still be eligible for part of the assistance, with the exceptions of moving into the premises after the “initiation of negotiations” and after being notified in writing “not to move.”

The City will not make any payments under this policy to a person who receives Federal, State or local payments with the same purpose or effect, except when payments are insufficient to meet replacement housing needs as defined by regulations in URA and Section 104(d).

The relocation assistance for eligible persons includes:

1. **Advice:** The City’s Housing Department staff will interview displaced persons to determine their need and preferences and provide counseling on relocation assistance. Housing staff will notify each occupant in writing of his/her rights and options under URA and/or Section 104(d).

Displaced homeowners and/or tenants will be offered information about not more than three safe, decent and sanitary comparable replacement dwellings (similar to occupant’s current dwelling). The purchase price or rent of the most similar of these dwellings will be used to establish the upper limit for the “replacement housing payment.”

The City will offer transportation to displaced persons to inspect the comparable dwellings.

Business occupants will be given as much information as possible about alternative locations, and advised on reestablishing their business in a new location.

2. **Financial Assistance:** The City will provide assistance for moving expenses and replacement housing payment.

An eligible occupant(s) will be reimbursed for reasonable moving expenses; however, he must choose either an actual move or a fixed move:

a. Actual Moving Expenses:

Eligible costs may include:

- § *transport of people and property (maximum 50 miles)*
- § *packing and unpacking*
- § *disconnecting, dismantling, removing and reinstalling household appliances*
- § *storage of property (maximum 12 months)*
- § *insurance of property during move or storage, or replacement of items lost or damaged in the move, etc.*

The City may require three competitive bids from three moving contractors, and for reimbursement, the occupant must document the cost of the move with contractor’s receipts or vouchers. In a business case, the City will **not** pay the cost of:

- § *loss of profits or goodwill*
- § *rent increases*
- § *loss of trained employees*

b. Fixed Moving Costs:

To compute the amount of assistance, staff would count the number of bedrooms in the displaced unit and refer to an updated moving schedule published by the Federal

Highway Administration for the State of Georgia at https://www.fhwa.dot.gov/real_estate/uniform_act/relocation/moving_cost_schedule.cfm (see chart below). See Federal Register 80 FR 44182.

WITH FURNITURE: (Ga. Revised 8/24/15)

Number of Rooms

1	2	3	4	5	6	7	8	Each Additional Room
600	975	1300	1600	1875	2125	2325	2525	\$200

WITHOUT FURNITURE:

First Room	Each Additional Room
\$375	\$100

In the case of an eligible **business** or a **nonprofit organization**, a **fixed payment** is equal to the average annual net earnings of the business, but may not be less than \$1,000 or more than \$20,000.

In addition to reimbursement for moving expenses, the occupant will be eligible for a replacement housing payment. However, this assistance will vary with homeowners, tenants and businesses.

The City will pay to the displaced **homeowners** the difference between the price paid by the City for the existing dwelling and the price of **either** the most similar comparable dwelling offered by the City **or** the dwelling actually bought by the owner, whichever is less. The City will also pay:

- c. *reasonable incidental expenses (e.g., legal costs, closing costs, loan fees);*
- d. *increased interest costs where the interest rate on the new mortgage is higher than on the old mortgage.*

The owner may choose to rent a replacement dwelling. In this case, the replacement housing payment will be based upon a formula using the difference in rent between the unit from which the tenant was displaced and either the most similar comparable dwelling offered by

the City or the dwelling actually rented by the tenant, whichever is less.

Tenants will be compensated in a lump sum or with installments for increased rent at the new dwelling. Low-to-moderate-income tenants may be eligible for payments under URA and Section 104(d). The tenant will choose between the two payments and receive all or part in the form of cash, housing vouchers or certificates.

Tenants who prefer to buy a house are entitled to down payment assistance. The amount of down payment assistance will equal the amount of rental assistance that would have been paid over the period of monthly installments and paid as a lump sum.

The City will provide displaced persons with referrals to comparable replacement housing and at least a 90-day notice to vacate. The City may require the occupant to vacate the property in less than 90 days with a written waiver of notice or under unusual circumstance.

When a **business** qualifies as a displaced person, it will be eligible **only** for a “replacement” payment not to exceed \$10,000 for expenses actually incurred in reestablishing operations at a replacement site.

III. Minimizing the direct and indirect displacement of persons from their homes

The City’s **Anti-Displacement Policy** requires that every effort is made to ensure that Community Development Block Grant (**CDBG**) activities and other federally-assisted funds are used to minimize the direct or indirect displacement of persons from their homes or place of business. Additionally, the Assistant Director and the Loan Officer in the Housing Department will be responsible for notifying the Relocation Specialist at time of acceptance of any applications with potential displacement of families. The following are steps to minimize the burden of displacement:

- a. Establish a housing counseling program to provide information on available comparable units and to assist in identifying and addressing needs of displaced persons;
- b. Coordinate with Housing Codes Division by informing housing code officers of rehabilitation and housing assistance programs;
- c. Rehabilitate apartment units in phases to allow tenants to remain during and after rehabilitation by working with empty units or buildings first;
- d. Relocate with assistance and expense of the City eligible displaced persons

who require temporary housing;

- e. Reimburse displaced persons while in temporary housing for increased housing costs and **either** reasonable out of pocket moving expenses **or** a fixed payment determined by the City for a specific project;
- f. Furnish a copy of a “Notice of Denial” to the landlord encouraging the landlord to provide this to tenants seeking to lease the property after the “initiation of negotiations”.

The City is committed to implementing the above strategies in a way that will assure compliance with HUD’s URA and Section 104(d) regulations. The City’s Fair Housing Policy requires that every displaced person have an equal opportunity to live in available replacement housing or a place of his/her choice without regard to race, color, religion, sex, national origin, age, familial status or disability. However, the Fair Housing Policy for the Relocation Program shall not be interpreted as requiring the City to provide a larger housing payment than the established upper limit for “replacement housing.”

Anyone who believes that the City has wrongly decided his eligibility for benefits payable under this policy may appeal. The time limit for appeals is 180 days from the date of the City’s decision. The appeal will be reviewed by the City Manager or a person designated by him who has **not** been directly involved in the action leading to the appeal. The hearing of an appeal does not affect the appellant’s right to judicial review. The City will **not** pay any legal costs incurred by the appellant in making the appeal.