Citizen Participation in the Community Development Block Grant Program -- First Year Report

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Title I of the Housing and Community Development Act (HCDA) of 1974 established the Community Development Block Grant (CDBG) program. CDBG is an entitlement program which gives cities broad latitude in spending the funds they receive. The original statute and amendments incorporated in the 1977 HCDA require that citizens be provided an opportunity to participate in the formulation and implementation of each city's program. The 1977 Act stipulates that each city prepare a citizen participation plan, but except for a requirement of public hearings, it does not specify the content of the plan. As a consequence, cities vary considerably in the mode of citizen participation and degree of citizen influence connected with CDBG. In this paper we address the way citizens, especially as organized into community groups, affect CDBG expenditures within cities, and, more broadly, how CDBG-related participation ties into the range of city programs bearing on community development. Conversely, we also inquire how the activities of community groups are shaped by the block grant program.

Our discussion here constitutes a first year report of findings on citizen participation as part of the University of Pennsylvania four-year Community Development Strategies Evaluation (CDSE). The study as a whole is designed to enable the Department of Housing and Urban Development (HUD) to determine the impacts of the residential aspects of the CDBG program on individuals and neighborhoods. The HUD Statement of Work (USDHUD, 1978a)for the study project prescribes that Task 10

"determine the role and effect of neighborhood citizen organizations on CD /community development/ activities." It elaborates the following areas of concern:

> (1) Determinants of the levels of citizen group activity in relation to the CD program, including prior activity of citizens groups, and social, economic, and demographic characteristics of neighborhoods in which activity takes place. "Are the mechanisms established in the legislation and locality appropriate to the task of fostering active citizen involvement?"
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> (2) Determinants of success in participation, as measured by "the extent to which knowledge, opinions and preferences of organized groups and their members are reflected in the CDBG plan or in CD programs actually implemented." Citizen influence is to be assessed in the allocation process, especially in terms of effects on the geographic allocation of funds and types of activities undertaken and whether it increases the share of CDBG funds received by "relatively disadvantaged groups and neighborhoods." Citizen participation in implementation is to be assessed based on whether "the objectives of CD activities /are/ more likely to be achieved if organized groups are explicitly involved in program implementation at the neighborhood level."
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> (3) The possible effects of organized citizen action in the CDBG process on non-CD activities of groups.

The ultimate purpose of the investigation of citizen participation is to "permit inferences about the preconditions affecting meaningful citizen involvement in the allocation of CDBG funds and in CD-plan implementation" (USDHUD, 1978a:109).

Methodology

The research described here is based on observations and interviews in nine cities (New Haven, Connecticut; Pittsburgh, Pennsylvania; Wichita, Kansas; Saint Paul, Minnesota; Corpus Christi, Texas; Birmingham, Alabama; Memphis,

Tennessee; Denver, Colorado; and San Francisco, California). These cities were selected as the study sample for the entire CDSE project, based on the criterion of including maximum variability of city type and program mix (see Appendix A). The period of observation on which this report is based extends from February 1 to December 31, 1979. Our conclusions are therefore based on a relatively short period of observation, which has not yet encompassed the entire CD process from application to implementation in any city.

The material which forms the basis for this report consists of 408 interviews (see Appendix B), as well as reports on meetings attended by the research staff, published documents, and newspaper accounts. Persons to be interviewed were selected by a variety of methods, with the objective of gaining the broadest possible range of informed opinion. The field observers began by identifying several initial informants, who were recommended by city officials or local scholars. These individuals were asked to name others who were active in community development. In addition, all members of official CDBG citizens advisory boards were placed on the list to be interviewed, as well as heads of community organizations, city counselors, other elected officials if they played a role in development decisions, mayors, city administrative staff, and HUD personnel. The interviewing process is continuing at the time of this writing; thus, the composition of the sample on which this report is based may not fully represent the entire group that we expect to interview during the life of the project.

Interviews and other data have been collected by four field observers, who report directly to the leaders of this task. An observer visits a city for two or three weeks at a time, then returns home and writes up his or her interviews, meeting notes, and summaries. Each city had been visited at least twice at this writing, the largest cities more often. From the diverse array of information collected, we formulated a picture of the process of program development in each city, following up discrepancies among our sources and directing further attention to areas which are the focus of divergent viewpoints. Within each city we identified neighborhoods which, as the target of revitalization efforts, deserved concentrated attention. We also studied particular organizations which had been heavily involved in neighborhood development.

The interviews are open-ended and vary according to the city, the information already obtained, and the type of person being interviewed. Examples of the kinds of questions used are as follows:

> To general informants: How are the relations between CD officials and community groups structured on a day-to-day basis? (If one exists) what is the importance of the advisory council? Who does it represent?
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> To general informants: Who makes the decisions about the CDBG program? Through what process? What influence do community groups and associations have? Political parties? City planners? Federal officials?
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> To administrative officials: Characterize citizen participation in CD in this city. Have there been any changes in the character of citizen participation over the years? If any, to what do you attribute them?
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> To administrative officials: Have you relied in any way

on the activity of community groups to help you achieve your planning goals? How? What happened?

To community organization leaders: Have you tried to affect the way CDBG funds are spent here? In what way? What was the result? How do you explain that? Have you proposed projects which your organization itself would implement?

To community organization leaders: What about the citizen participation process--how much of a role do citizens play in determining which neighborhoods will be targetted to receive CDBG programs? How much influence do citizens have? Over what?

To political leaders: Who are the important decision makers in relation to urban development issues? What kinds of programs do they support? What are the roles of federal and city officials? Planners? Community groups? Political parties? How meaningful is the formal structure of decisionmaking and participation?

A number of additional questions were asked concerning the specific history of urban development in each city, the organizational structure and activities of community groups, the availability of technical assistance, and the impact of the CD program on low and moderate income neighborhoods. The interviewers had considerable discretion in terms of modifying the interview format so as to follow up on particular responses or to raise issues that seemed germane.

This report does not involve an analysis of the effect of participation upon the strategies and outcomes being evaluated by other components of the CDSE study. Because various aspects of the study are being developed simultaneously, we do not attempt to determine whether more participation produces specific program results. Even at a later date we only expect to indicate the kinds of results associated with participation, not whether they are better or worse. We restrict ourselves here to

describing the levels of citizen group activity in the CD program, the extent of citizen influence, and the likely reasons for our findings.

We break our general research concerns down into four, more specific, policy-related inquiries:

1. What is the range of procedures for citizen participation in CDBG decisionmaking in our sample cities? What difference does formal procedure make in terms of levels and influence of participation?

2. Who participates and why? In particular, what is the participation of low and moderate income groups, who are intended in the legislation to be the primary beneficiaries of CDBG?

3. What are the political and social conditions which facilitate active citizen participation? In what contexts does participation tend to be absent? We include in our investigation attitudes of city officials, availability of technical assistance, intervention by the Department of Housing and Urban Development (HUD), levels of community mobilization and their antecedents, etc.

4. What is the nature of community group participation in developmental decisionmaking? Over what issues does it take place, and how does CDBG decisionmaking relate to other decision areas which also affect neighborhood quality? At what points in the decision process is there citizen participation? How influential is it?

Answers to these questions are intended to assist three

different audiences in determining their strategies in relationship to citizen participation. First, neighborhood groups themselves need information concerning kinds of procedures which they can use most effectively, and general circumstances which justify their expending energy on CDBG participation. Second, city administrations wish to know the range of citizen participation formats and their potential effects. Third, the federal government wants to find out how its activities shape local behavior.

We start from a value position which assumes that community participation is necessary (although not sufficient) to assure representation of neighborhood residents in city decision-making.[1] We do not, however, assume that all the aforementioned audiences equally value citizen participation (see Fainstein, Fainstein and Armistead, 1979) nor do we believe that high levels of participation always produce the most desirable results. We therefore avoid labeling our findings as good or bad. Instead we limit ourselves to classifying participatory behavior according to a set of descriptive dimensions, then offer suggestions directed at answering the question raised in the Statement of Work concerning "mechanisms. . . appropriate to the task of fostering active citizen involvement." We do not interpret a relatively low level of citizen involvement to mean that a city has failed to comply with the legislation or administrative regulations governing CDBG. Our findings concerning the determinants of citizen activity and influence are addressed to the research concerns of the Statement of Work not to questions of statutory conformity.

We therefore conducted this research under the assumption that all cities were in legal compliance with the statutory provisions concerning participation unless determined otherwise by the appropriate juridical body.

General Applicability of the Findings

The findings on citizen participation, like those of other components of the University of Pennsylvania study, are derived from nine cities. The cities were selected to maximize variation; that is, they were intended to represent as full a range of types of activities as possible. Because of the limited number of city observations, we do not claim statistical generalizability. Rather, we believe that a strong argument can be made that any characteristics present in all nine cities, given their extensive variability according to geographical location, socio-economic base, and program effort, constitute general effects of CDBG. Most of our findings do not comprise such general effects and we therefore seek to trace particular modes of behavior to specific causes. We do not think, however, that these kinds of specific causal chains are unique to particular cities. For example, we indicate in our discussion that citizen participation is either weak or unfocussed in cities without a citywide advisory board. While only three of the study cities do not have such a board, the processes which inhibit citizen input in these cities seem logically to exist wherever there is no citywide board. Thus, we can deduce the consequences of the absence of a board without

examining a great number of cities where such is the case. On the other hand, we cannot use our cities to predict the frequency with which such boards are present or absent within entitlement cities throughout the country.

Dimensions of Analysis

In an earlier paper examining measures of citizen participation,(Fainstein, Fainstein, and Armistead, 1979) we stated that levels of participation and extent of citizen influence could not be evaluated along a single scale. Rather these issues had to be discussed in terms of three broad questions: (1) Through what mechanisms does participation take place? (2) Who participates? (3) How influential are citizen participants, over which decisions do they have influence, and at what points in the process can they affect its outcomes? These questions are translated into the dimensions of mode, representation field, and scope (see Exhibit 1). The dimensions provide a framework in which we can disaggregate the various components which comprise the participatory structure in the cities under study. We therefore group our findings according to these dimensions, then use them to answer the policy-related questions listed above.

MODES OF PARTICIPATION

The Housing and Community Development Act gives cities considerable leeway in devising institutions through which citizens can present their views. HUD guidelines emphasize that cities should conform to the spirit of the legislation:

Exhibit 1

DIMENSIONS OF CITIZEN PARTICIPATION

1. Mode.....by what mechanisms or structures is participation effected? How?

   1.1 Institutionalized.....structures instituted by the municipality for receiving citizen input specific to CDBG and similar programs.

      1.1.1 City-wide advisory boards.
      1.1.2 Public Hearings
      1.1.2 Neighborhood advisory boards

   1.2 Electoral and interest-group politics.....the process by which decisions are made outside of any specific structure for citizen input on CDBG or similar programs.

   1.3 Non-institutionalized....protest movements, litigation, administrative complaints, and other non-routine modes of communication.

2. Representation field.....which interests or individuals participate? Who participates? What geographic areas and social groups do they represent?

3. Scope.....what is the purview of the participants, i.e., what can they affect? How much?

   3.1 Authority.....what degree of legal or customary authority is enjoyed by citizens using institutionalized modes of participation, regardless of span or stage?

   3.2 Span.....over which programs do participants have jurisdiction?

   3.3 Stage.....at what point in the set of activities identified by span may citizens intervene, e.g. anticipatory stage, in agenda setting, decisionmaking implementation, evaluation? When?

> The citizen participation regulations emphasize a process of citizen participation rather than mandating a particular structure. . . . The CDBG program is intended to principally benefit low- and moderate-income persons, but in many communities they have been traditionally left out of decision-making processes. Therefore, special attention must be given to obtaining their participation. (USDHUD /1978b/,4-5.)

Cities have devised a variety of processes for eliciting community opinion; throughout the country the establishment of advisory boards of varying type has been the most popular measure.[2]

The three principal ways by which community groups have affected the CD programs in our study cities have been through public hearings leading to the construction of "wish lists," official citizen participation advisory boards, and lobbying of mayors and councils. By and large these activities have been carried out within the framework established by city officials, and community groups have not used the institutional apparatus of community development as a basis for mobilization. This contrasts with earlier federal programs like Community Action and Model Cities, under which board members sometimes used their resources to confront the city administration and seek independent power. CDBG advisory councils seem to have accepted, or have felt that they had no choice but to accept, their positions as essentially dependent on the city administration's good will and have refrained from behaving in ways that risked forfeiting it

Six of our nine study cities have established citywide boards to advise the mayor and council on community development

activities. Of these six cities, four also have district-based councils which act on concerns particular to their areas. The structures in these six cities are as follows:

> Saint Paul: district councils chosen through a variety of methods are composed of delegates from community groups; citywide council (CIB Committee) is appointed by the Mayor according to state senatorial districts; task forces of district council members meet with the citywide body; each district has a paid community organizer stationed in the district who is hired and fired by the district council.
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> Wichita: neighborhood councils are elected by residents; each neighborhood council selects a delegate to the citywide body.
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> San Francisco: citywide board appointed at large by Mayor; informal geographic representation; no neighborhood councils but Redevelopment Agency project area committees and Rehabilitation Assistance Program (RAP) councils in areas undergoing intensive activity.
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> Memphis: citywide board appointed by Mayor, consisting of citizen representatives, both at-large and by district, citizen members of city commissions, city department heads, and city council members; many small districts, each with designated area organization.
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> Birmingham: citywide board consisting of delegates from community boards; community boards containing delegates from smaller neighborhood boards; elections held at each stage.
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> Denver: citywide board appointed by Mayor and by Council; some members selected by district, others at large.

None of the six boards is chosen by the same method, but Wichita, St. Paul, and Birmingham have roughly similar systems, with extremely elaborate processes of selection and complex organizational structures. Denver and San Francisco have the simplest systems and nominally have no community participation in the appointment of board members. Memphis is the only city that includes administrative officials on its board.

Cities without boards also show a variety of practices. The procedures in the three cities lacking citywide advisory councils are:

> Pittsburgh: high level of citizen group activity oriented around CDBG; 2 non-official citywide bodies concerned with CDBG; city officials participate in one of these bodies (Advisory Committee on Housing and Community Development); planners with specific neighborhood responsibilities elicit ongoing neighborhood input.
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> New Haven: high level of CDBG-oriented activity by directors of service-providing agencies and presidents of neighborhood preservation teams (NPTs); NPTs, chosen at community meetings, resemble RAP councils in San Francisco; project area committees exist in urban renewal areas; development commission, consisting of business and real estate people, advises on downtown development.
>
> Corpus Christi: citizen input into CDBG through hearings held in neighborhoods under auspices of county community action agencies; city planning commission is official citywide body commenting on CDBG.

New Haven and Pittsburgh resemble each other in that much CDBG-related activity goes on through the regular political process rather than through bodies officially designated to deal with development and planning. They differ, however, in that community groups in Pittsburgh, while competitive, have formed citywide coalitions (Pittsburgh Neighborhood Alliance, Advisory Committee on Housing and Community Development) which aim at presenting a unified set of objectives. Corpus Christi differs from these two other cities without advisory boards in having a relatively low level of community activity focused on CDBG and a lower level of inter-neighborhood competition. While black and Chicano areas do vy for resources to some extent, the black community is very small and thus is restricted in its potential

impact.

Non-Institutionalized Participation

In general, the administration of the CDBG programs has averted major protest. Reasons for this are numerous. Significant protest movements have lost strength in American cities, as the old leadership has either melted into the institutionalized power structure or withdrawn. The report of one of our field staff on San Francisco's Mission District, a largely low-income, Hispanic area, captures the quality of political transformation in a formerly highly mobilized neighborhood:

> One often hears people speak of the days of Mission Opposed to Redevelopment and the Mission Coalition. The speakers are usually the directors of current social service organizations who were formerly part of those groups, and the Mission Model Neighborhood Corporation, which antedated the days of CDBG. At that time the Mission was seen as politically strong and well-organized. It is pointed out that people in the Mission made a decision against physical redevelopment by the Redevelopment Agency, while other minority (black) neighborhoods decided to go with redevelopment. Leaders from those neighborhoods are now on the staff of the Redevelopment Agency. The Mission Coalition died out at about the time that the various social service agencies were established with Model Cities funding. Should this be seen as co-optation or a sign of the success of the community movement? After all, they did not want redevelopment; they did want social services; and they got them. On the other hand, with the advent of the individual social service programs and their eventual individualistic relationship to the later CDBG process, a neighborhood-based, broad-issue community coalition died out. The transition to CDBG contributed to this outcome. The centralized Office of Community Development and centralized community advisory board furthered the individualistic, agency-centered tendencies that were developing.

A black leader in Wichita asserted: "Blacks lost when the movement ended, and official programs like CDBG came in."

The political context in which CDBG operates thus makes major conflict around the program unlikely. The energies of neighborhood groups and community organizers have more recently been directed, on the one hand, toward statewide issues such as utility regulation, and on the other, toward very discrete local ones like gaining a neighborhood recreation facility. There are, in addition, a number of factors specific to CDBG which limit its potential as a mobilizing issue. Mainly the activities it funds are small-scale; the goad which area-wide clearance provided for community action under Urban Renewal does not exist. A CD official noted: "It is only in neighborhoods in which a threat is perceived that people are willing to organize." The expectations generated by CDBG, given its limited funding in relation to need and the emphasis on small projects, contrasts with the hopes fostered by Model Cities, which promised the social and physical transformation of poor neighborhoods.

When CDBG has provoked controversy, it has been over the issues of the adequacy of citizen participation provisions and the proportion of funds going to low and moderate income recipients. In three of the nine study cities, administrative complaints were brought to HUD by community groups. HUD, however, has no set procedure for dealing with such complaints, and it

has mediated the issues on an ad hoc basis as they have arisen. In fact, HUD has little power over the cities if they refuse to accede to its interventions. Denial of the entire allocation constitutes a heavy punishment, only to be imposed in the event of flagrant violations of guidelines. Since the citizen participation requirements are vague and mainly hortatory, HUD cannot point to any real violation of the regulations if a city meets the minimum requirements of two public hearings and a citizen participation plan. The principal beneficiary requirement is somewhat more specific, but community groups have difficulty in substantiating violations of it. Moreover, the elimination of slums and blight objective of the legislation offers cities an alternative justification for their spending allocations. Thus, part of the settlement of the Birmingham administrative complaint involved the city's simply dropping its claim that certain projects benefitted low and moderate income people and placing them in the elimination of slums and blight category. A public official in another city commented: "There is a federal schizophrenia--an equity concept of neediest first versus an equality concept of everyone gets a share." This underlying confusion of aims inhibits recourse to the HUD bureaucracy as an option for citizens dissatisfied with local program administration.

Modes of participation under CDBG, then, have been peaceful, and community groups have acceded to city guidelines in using the program. Whether this acquiesence has resulted in program uses in conformity with CDBG's objectives, especially the low

and moderate income benefits requirement, is still unclear. As our research develops further, we will investigate the relationship between community mobilization and the distribution of benefits.

REPRESENTATION FIELD

The cities in our study vary considerably according to racial and ethnic make-up and income distribution. Participation in CDBG policymaking reflects the interaction of local program structure with population composition. We therefore look at representation field in terms of two descriptors--extensiveness or broadness of participation, and intensity or depth of participation. We wish to determine whether the process (a) is broadly inclusive, and (b) particularly responds to input of low and moderate income persons, who are identified by the legislation as principal beneficiaries of CDBG. Our discussion here is limited to the information drawn from interviews and observations of meetings. We expect eventually to be able to identify the class, racial, and geographic characteristics of participants through the analysis of a telephone survey of a random sample of citizen participants in each city.

Extensiveness

Broadest participation exists where there is some form of district representation, either as a result of district-based selection of citywide advisory board members or the existence of separate district councils. The most widespread

involvement within the nine cities is found in Saint Paul, where the Capital Improvement Budget (CIB) Committee advises on the regular capital budget as well as the use of CDBG funds. As a consequence, every district has an incentive to become involved in the budgeting process, even if it does not receive CDBG funding. Saint Paul's system provides for discussion of projects at several stages of the funding process and attracts the attention of a variety of groups including neighborhood business committees as well as residentially oriented associations. Denver and to a lesser degree San Francisco and Birmingham have considerable community activity and permanent formal structures intended to draw out community input. Wichita resembles Saint Paul in its socioeconomic characteristics and district-based system and similarly receives relatively little CDBG funding due to its comparative affluence. But in Wichita the restriction of the citizens advisory board to CDBG policy, given the small amount of funds incorporated in CDBG, results in lower levels of participation. Overall we have some cities which have formal, citywide institutions for ongoing participation combined with differing levels of community activism (ranging from high in Denver to relatively low in Memphis); others with active community groups but no permanent structure of participation (Pittsburgh, New Haven); and one (Corpus Christi) with no official advisory body except the city planning commission and little independent grass-roots activity.

Intensity

The requirement that CDBG benefit primarily low and moderate income groups has meant that individuals drawn from these groups have in most of the cities been active participants. Attempts to affect program outputs by community groups representing lower income people are quite evident in San Francisco and Denver; less substantial but still apparent in Birmingham and Memphis; and seemingly negligible in Saint Paul, Wichita, and Corpus Christi. Saint Paul and Wichita are cities with large middle classes and without large, contiguous black communities; the presence of relatively few low-income participants despite an elaborate formal structure of eliciting input is in part a reflection of these demographic characteristics. Corpus Christi both lacks institutions for ongoing participation and has relatively little group activity independent of government sponsorship, despite the existence of a large, poor Hispanic community. The city relies on the County-funded Community Action Program to act as the organizer for lower class representation. In New Haven and Pittsburgh there is considerable activity, but the lack of a formal representation process makes identification of lower income participants more difficult.

Regardless of format, level of mobilization, and extent of representation of low income groups, agency staffs play a significant role within the formal process. The nature of their interventions varies from actual membership on the advisory board in Memphis to a strongly directive role in agenda-setting

and program evaluation in all the cities. Counterbalances to staff influence are more likely to be found in the Mayor's Office or the city council than within citizen advisory boards. When citizens groups are effective in overriding staff, it is often the result of direct appeal to elected officials.

The significance of staff in shaping program outcomes is a constant of public programs involving full-time salaried bureaucrats and part-time amateur policymakers. Not just community groups but city councils and even mayors must rely on professional staff for information and advice.[3] The extent to which staff regards community groups as a primary reference group varies considerably among the cities and is an indicator of the political power of such groups, the attitude of the mayor, and the perceptions which professional staff themselves hold of their appropriate role. These range from one CD planner's view of herself as a "guerrilla within the bureaucracy," whose purpose was to improve city responsiveness to low income groups, to another's pronouncement that what citizens usually ask for is "junk." The latter individual construed his role as the application of "rational planning criteria" to the range of citizen requests. Several officials commented that citizen participation was most useful as a source of information concerning neighborhood conditions to which planners could respond. According to this model, planners initiate the policy responses to the situations which citizens describe.

Effect of Process on Representation Field

Our findings indicate that the formal structure of participation is only one of a number of elements determining who participates in decisions affecting community development. We still, however, can make some assertions concerning the effect of formal structure upon participation.

1. Cities without a citywide board present major obstacles to participation. The absence of an advisory board causes community groups either to compete with each other for access to the decision process or to give up the effort altogether. Community leaders under this system tend only to represent their particular neighborhood since they are never in a position to view overall policy. The establishment of citywide priorities becomes the exclusive realm of agency staff and elected officials.

2. Cities with a citywide advisory board display considerable variation in the extent of citizen participation. A citywide participatory structure does not guarantee widespread community input. An advisory board's effectiveness depends on both the receptivity of officials and the level of mobilization of participating groups. In the words of one Advisory Board member:

> It is important to have the people in the neighborhoods united behind you because the only real power advisory board members have is persuasion, persuading Council members and the Mayor that the people at large disagree with them. Sometimes they have to take it to City Hall.

3. In cities with advisory boards the method of appointing members makes no noticeable difference in participatory activity.

But whether appointed or elected, board members who are backed by a genuine constituency, as opposed to simply having an interest or expertise in community development issues, are more likely to be consulted.

4. Whether board members are chosen at-large or by district does not matter per se. But whether a member is clearly identified with a particular neighborhood does affect the character of representation. District-oriented people tend to act as advocates of their communities, regardless of the mode of selection.

5. Whatever the format of participation, the level of group mobilization around development issues varies within each city. Some neighborhoods will participate far more actively than others. Level of neighborhood participation is a function of at least four variables: (a) perceived need; (b) prior program history; (c) present leadership; and (d) role of citywide groups in advocating neighborhood revitalization. The last factor represents the willingness of some communities to rely on citywide coalitions or racial/ethnic organizations to represent their interests.

SCOPE OF PARTICIPATION

So far we have discussed who participates and how the formal structure affects participatory activity. But we have not examined the impact of participation on decisionmaking. We now turn to that question by analyzing the degree of authority granted to community leaders, the span of programs over which

they exercise that authority, and the stage of the decision process at which they exert it.

Authority

The Housing and Community Development Act restricts the power of citizens groups to a purely advisory status. Nowhere do they have decisional or even veto power. Nonetheless the authority wielded by such groups varies from a considerable degree of influence over the city's development priorities to virtually none at all. In all places authority is problematical and depends on both the willingness of city officials to listen and the ability of community leaders to persuade. In only two of the study cities (Denver and Saint Paul), are these conditions present at a sufficiently constant level for us to contend that citizen representatives exert substantial control over development priorities. While we argue in this section that a citywide board increases the potential influence of citizen participation, we do not intend to imply that the legislation requires such a format nor that it can, in itself, make a fundamental difference in the effectiveness of neighborhood groups.

In all nine cities the CD offices consult regularly with some neighborhood groups, based on the judgements of administrators that the groups are representative and the interchanges are helpful. In the three cities without citywide boards, the CD office and elected officials make the sole determination of what messages from the neighborhoods should be considered as

genuinely representing citizen demands. In these three cities citizen participation is almost always in connection with issues specific to the interests of particular neighborhoods. There is no formal mechanism by which community groups can influence the setting of overall priorities, other than through elections of city officials.

The absence of a citywide advisory board thus limits the level of citizen authority. Without designated community representatives, advisory powers are at best sporadic, depending on the capacity of community groups to gain attention through political connections, vehemence, or bureaucratic responsiveness. Citywide boards receive more media coverage than separate neighborhood groups, thereby enhancing citizen influence. Newspapers routinely cover advisory board meeting; in Birmingham a television station presents a bi-weekly program on advisory board activities. In contrast, neighborhood groups are rarely significant enough to gain citywide media attention.

Two of the cities--Wichita and Memphis--have complex systems for eliciting citizen input but nevertheless do not provide much citizen authority. While neighborhood and citywide advisory boards are consulted, they are restricted by guidelines which allow them little discretion. The other four cities with advisory boards--Denver, San Francisco, Birmingham and Saint Paul--present varying degrees of citizen authority. The Mayor's Advisory Council (MAC) is rarely overruled and has

considerable effect on developmental priorities. The rating for San Francisco is somewhat more ambiguous. The Citizens Committee for Community Development (CCCD) is highly active and is certainly consulted; the breadth of its discretion and the receptivity of the Mayor to its advice are both difficult to calculate. In Birmingham, too, it is difficult to assess actual influence of community groups on program outcomes, but it does seem to be relatively high compared to most of the other cities. In Saint Paul there is considerable leeway at the neighborhood level for community input in designing programs; citywide bodies are limited by the overall city priority system, especially as it excludes the use of CDBG funds for social service expenditures. Nevertheless, the Saint Paul process incorporates considerable citizen influence throughout the decisionmaking process.

Social service expenditures are especially subject to administrative determinations. City planning and community development officials seek to minimize them as much as possible in most of the cities, usually putting a cap on social service spending below the HUD 20 percent guideline and preventing the advisory boards from exceeding it. Citizen boards are also at a disadvantage when advising on neighborhood strategy area (NSA) selection, since HUD guidelines and local staff interpretations of them prescribe the criteria within which they are to be chosen. For example, the president of one citywide advisory board complained that the city administration had

deliberately excluded eligible neighborhoods from NSAs by drawing the boundaries unnecessarily narrowly. He asserted that "the city could have grouped neighborhoods together for treatment. . . .When we /the Citizens Advisory Board/ get a decision to make, the city is telling us what they are going to do. We have the power to make decisions about streets and sewers, nothing else, really."

In general the authority of community groups is weaker under CDBG than under the Model Cities and Poverty Act programs. The CD legislation clearly intended this result in its stipulation that none of the citizen participation requirements should "be construed to restrict the responsibility and authority of the applicant /the city government/ for the development of the application and the execution of the Community Development Program." In other words the city is prohibited from delegating its powers to develop and execute the CD program to a community advisory body.

The consequence of the weakening of other bodies, either at the city or neighborhood level, is in most cases the centralization of power within the chief executive's office. In some cities where the city council is politically strong, authority is shared. But in all circumstances CDBG has attenuated the trends under other federal programs toward the development of autonomous bodies either by function (e.g. urban renewal authorities, Community Action agencies) or territory (e.g. Model Cities boards, project area committees).

The centralizing effect of the CDBG restrictions are magnified by the paucity of independent resources available to community groups. The HDCA provides no direct federal funding for technical or community organization staff responsible

to neighborhood groups, although a 1978 amendment to the Act provided limited funding to be awarded on a competitive basis to neighborhood organizations for specific projects (Title VII of PL 95-557, entitled the Neighborhood Self-Help Development Act). Some federal support is funneled through VISTA, which supplies workers to a number of community groups. The Community Services Administration (CSA) funds, by way of a contract to the Center for Community Change, monitoring efforts by community groups in a number of cities. On the whole, however, community groups are dependent on the city administration for staff services, while employees of the city administration, except in Saint Paul, do not depend on neighborhood approval to keep their jobs. When neighborhood organizations act as third party grantees to operate city-funded programs, they can hire staff but remain dependent on the city for continuation of their contracts.

HUD itself has little contact with neighborhood groups, even though many community leaders have expressed the desire for assistance in interpreting the regulations and backing in disagreements with the city administration. One HUD area officer, when interviewed on this point, declared:

> I stay away from that. . .I stay out of that stuff. I send complaints back to the city. Citizen participation is a lesser element of my concern. I try to get applications approved.

The reluctance of area offices to intervene routinely in program administration with regard to citizen participation derives from guidelines established in Washington:

> HUD's role. When a city or county submits its CDBG application to the HUD area office, it is required to certify that it has prepared and followed a written citizen participation plan. However, it does not have to submit the plan to the HUD area office as part of the application. HUD will normally accept this assurance. . . (USDHUD, 1978b:3.)

Community leaders complain that HUD will not provide them assistance in validating assertions by city officials that particular community proposals are contrary to program regulations. We have noted in several cities that local government officials contend that certain activities, especially social service programs, are not eligible for CDBG funding rather than admit that they oppose such uses of the funds. Even when city staff do not have a clear position on a controversial issue, they sometimes prefer to avoid taking responsibility for decisions under the program. In the words of one city CD staff person:

> You have established a series of special interest groups, competitive, . . .politicking with the city commissioners. So the city abrogates and sends the decisions to the feds.

The HUD area staff finds itself in a situation of ambiguity. because the legislation does, in fact, give considerable discretion to local officials. HUD personnel thus are reluctant to interpret the nature of eligible activities in controversies between community groups and CD officers. One HUD area officer professed uncertainty concerning her role:

> The job is so subjective and judgemental in nature that it's absolutely maddening. You can go to three offices, to three reps, my counterparts. . .we will not in any fashion, shape, or form come up with the same conclusions on being eligible or fundable, and

> if we did, the rationale why would be completely different. (Interview with HUD area officer.)

Much of the explanation for a diminished community role in CDBG decisionmaking, as compared to previous federal programs, then results from the local discretion intended by the legislation and the interpretation by HUD that its role should not be interventionist. As a result, the shape of local programs reflects the local political constellation rather than any federally prescribed structure.

Another constraint on community activism arises from the content of the program. CDBG differs from community action and social service programs in its capital-intensive, technical nature. The two largest components of CDBG spending are infrastructural improvements and housing rehabilitation. Citizen groups are not well equipped to judge whether the situation of bridges or sewer pipes is so desperate as to require immediate attention. Housing rehabilitation programs tend to have disaggregated effects; their impact on a community is not evident in the way that a large-scale urban renewal project is. The small social service component of CDBG means that the program offers few prospects of jobs for neighborhood people and hence one of the most important stakes in earlier programs is absent. CDBG thus does not in itself provide an intense stimulus for community involvement.

Given the constraining effects of a restrictive administrative structure and weak incentives for community involvement, the existence of some community group authority in several

cities requires explanation. We hypothesize that there will be considerable community group authority when three conditions are present: (1) high levels of community mobilization independent of the CDBG stimulus (Denver, Saint Paul, San Francisco, New Haven, Pittsburgh, Birmingham); (2) receptivity on the part of the city government to citizen input as expressed in a preference for having community leaders resolve conflicting development priorities; and (3) a prior history of federal programs which stimulated the development of community organizations. Our hypothesis corresponds to the conclusion of a study conducted in Northern California on the implementation of Model Cities, general revenue sharing (GRS), and CDBG. The authors of that study find that:

> The ideology and interests of the local dominant coalition /i.e., the elected officials and their constituencies/ and the degree of minority mobilization and incorporation in a dominant coalition are central to the explanation of variations in the implementation of all three federal programs, Model Cities, GRS, and CDBG. (Browning, Marshall, Tabb, 1979:21.)

The character of the interaction between city officials and community advisory bodies is portrayed by one chief executive as follows:

> On /advisory board/ recommendations, we have considerable input on their process, which is heavily influenced by what I would like. For example, on the elm tree disease issue, I went beyond the committee. They disagreed in principle with the removal of trees with CDBG dollars. I appeared before them on the principle that to replenish trees is a capital improvement. They gave money for planting because of my enthusiasm for the program. In other respects, the best test for their importance is that they pick projects which I might not think

> important if I was left alone, for example the new recreation centers.. ..A startling number of times we agree. Given my knowledge of the neighborhoods and cost benefit tradeoffs, I frequently come up with the same conclusions they do. I wouldn't say that it is due to heavy staff influence. Closer to the truth would be the same political influence. . . They listen to the same people I hear.

A report by our Denver field observer similarly illustrates the nature of community influence in a city where the citizens advisory body plays an important role:

> The Mayor's Advisory Council (MAC) is the main mechanism for citizens' input. The authority given to MAC is to serve the CDBG advisory body to the Mayor and Council, who have the final authority to submit an application. The MAC is a diverse and very influential body appointed by the Mayor (14 members) and City Council (13 members). It has been the custom for this body to wield considerable clout as its recommendations are frequently accepted, carried through, and reflected in the final application. It appears that Mayor McNichols, who had been Mayor since the Model Cities program days, made the early decision that he would not be the CDBG hatchet man--instead the weight was shifted to the council district level. The Mayor views the MAC as a true representation of the neighborhoods. The Council-appointed district representatives, especially those representing target areas /NSAs/, are very influential in the decisionmaking process. The Mayor has traditionally concurred with the process of: (1) letting the organizations and neighborhoods within districts fight it out among themselves to establish priorities; (2) letting the districts fight out their priorities with other districts; and (3) going along with the winners of the battles, without having been personally scarred in the process.

As the above description makes clear, a high level of authority for citizens' groups does not insure that all groups are equally well represented. Community participation in Denver may exclude those interests which are not highly mobilized. A few neighborhoods in Denver stand out because they need assistance,

their situation is recognized by the city, and they have effective leadership plus a mobilized citizenry. The relative prosperity of Denver may also result in a more manageable level of need within the funding constraints of CDBG. The most recent program year, however, produced a large increase in the volume of community requests for CDBG support, perhaps as a result of previous successes by neighborhood groups. Thus, it remains to be seen whether Denver's system can maintain itself in the face of greater competitive pressure for funds.

The interactions which enhance neighborhood influence in some of the study cities embodies a chain of connections among local political forces, objective economic and social conditions, and leadership attitudes. HUD, in its guidelines, emphasizes the importance of the attitudinal element:

> One essential attitude is for public officials to trust citizens and to believe that they and their organizations have important contributions to make. This reflects a recognition that no matter how much disagreement and conflict emerges from the citizen participation process, in the end a better program will result from honest discussion of differences and serious efforts to resolve issues in the spirit of a true partnership. (USDHUD, 1978b:11.)

But the determinants of leadership attitudes under CDBG are virtually entirely products of local interactions rather than the federal impetus. A high level of citizen authority in development programming depends on a local political situation whereby the dominant coalition finds it in its own interest to support conflict resolution within the community group structure. The importance of the local political context is particularly important in terms of structuring the character of minority

group influence on programs. Our research corresponds with the finding of the California study:

> Grants characterized by strong statutes directed toward benefitting minorities like Model Cities, result in more local targetting of benefits to minorities and more minority mobilization than grants with less federal control in that direction, such as GRS and CDBG (Browning, Marshall, and Tabb, 1979:21.)

Span

It is possible for community groups to have considerable authority over some aspects of urban development but not others. Within CDBG, citizen bodies may be consulted on the allocation of physical development funds but not permitted to determine the share of CDBG devoted to social services; or they may advise on programs within NSAs but not select the NSAs. Even when community groups can influence CDBG strategies, they may have no input into other urban development expenditures such as water-front development or the construction of tourist facilities. CDBG advisory bodies may be unable to affect the city's regular capital budget, resulting in the designation of CDBG funds for lower income neighborhoods and regular capital budget expenditures to high income and central business district areas. We refer to limits on the span of citizen inputs as segmentation (see Piven, Friedland, and Alford, 1978). Segmentation may permit city administrations to restrict social service and rehabilitation funding, substitute CDBG funds for normal city financing, and divert citizen attention from development issues which, while not directly affecting them, nonetheless have

major spillover effects on them. For example, a planning decision to convert a neighborhood of small industrial and commercial uses to a restaurant/boutique area changes the structure of employment in the central city and can affect rent levels in surrounding residential areas, even though it does not immediately displace any residents.

We have identified two principal modes of segmentation which exclude citizens from significant impact on a city's development program, even where community advisory bodies have nominal influence over CDBG spending. The first is the segregation of programs according to funding sources. Thus, the city's own capital budget is administered separately from CDBG capital expenditures; similarly other federal programs provide for different, or no, organized citizen participation. The major federal programs which support capital expenditures and affect neighborhood quality within cities are Section 8 and Urban Development Action Grants (UDAGs), both administered by HUD; Economic Development Administration (EDA) subsidies offered by the Department of Commerce; and General Revenue Sharing (GRS). A staff member in one of the HUD area offices remarked that the office, in exercising its oversight function, had considerable confusion in sorting out the differences in requirements for citizen participation in the various HUD-sponsored programs. She noted that the economic development programs like UDAG identify "different kinds of citizens."

The principal input in EDA and UDAG activities comes from

business interests. Section 8 rental assistance, in contrast, has as a rule no public participation but is administered by cities on a case-by-case basis. Section 8, however, is the only major program which can be used to keep down effective rental levels in rehabilitated areas. We have found a few instances where community participation in neighborhood planning has involved putting together a package including both rental and rehabilitation assistance. Mainly, however, Section 8 financing is apportioned by staff through a process unrelated to the CDBG one.

The second kind of segmentation, which has come to the fore since the imposition of requirements that cities name neighborhood strategy areas, arises from geographical differentiation. Community advice may be sought for NSAs but not for other neighborhoods. CDBG funds are directed toward the former, thereby fulfilling the principal beneficiary regulation, and regular city funds go to the other, relatively affluent neighborhoods. By this device community representatives in cities without a unified capital budget procedure are circumvented from determining the overall allocation among communities of the total sum of funds going to neighborhood improvements.

In cities where community input is restricted to programs funded by CDBG, the tendency is for diminishing effect on the total development process as CDBG funds become a smaller proportion of the entire development pie. Increased funds for

EDA and UDAG in recent federal budgets plus the passage of more and more local bond issues tied to earmarked revenue streams have meant increased segmentation of citizen participation in those cities.

Nevertheless, Denver's citizens advisory board (MAC) has broad discretion over CDBG strategies as well as over other programs, including UDAG. In Saint Paul CDBG funds are considered within a process which includes all capital improvement monies. A citizen member of the Capital Improvements Budget Committee described the process as follows:

> Districts come in with wish lists and make presentations for their own particular projects. . . We felt the need to spread money around all over . . . We still look for greatest need, especially with regard to CDBG. But tax monies don't work that way, so we give districts who pay heavy taxes something /from the regular capital budget/.

Saint Paul also allows some community participation in the development of UDAG applications.

Birmingham involves its advisory board in the capital budget process, as well as allocating some general revenue sharing funds to neighborhood boards to spend on their own projects. In San Francisco the Citizens Committee on Community Development (CCCD) has an indirect impact on other development funds because the staffs of the urban renewal and economic development agencies are paid with CDBG funds. Pittsburgh combines its CDBG and capital budgetting allowing public comment on both. But community leaders complain that it is done in a manner to obfuscate whether low and moderate income people are receiving CDBG benefits

in conformance with the principal beneficiary rule (CDBG Subcommittee, 1980: 2.) Memphis and Wichita allow considerable citizen participation on narrow allocative decisions but foreordain broad strategy decisions through staff interpretations of permissable expenditures. Memphis, in its second round of selections of NSAs, shifted the consideration of neighborhood applications to the Action Program Advisory Committee (APAC), whereas in the first round this was wholly a staff function. In New Haven and Corpus Christi community groups have virtually no discretion over broad strategy questions and only limited input into specific allocative decisions.

In a number of cities, decisions were made without the consideration of a broad range of alternatives. Thus, San Francisco and New Haven, which had major incomplete urban renewal projects in progress when CDBG was instituted, simply continued them and eventually labeled the project areas as NSAs. In Wichita, Saint Paul, Pittsburgh, and Corpus Christi, CD officials felt for various reasons that the NSA strategy was inappropriate to their situation and modified their programs to comply with HUD regulations while retaining their previous priorities to the greatest extent possible. The following kinds of explanations were offered by city officials in two cities concerning their reluctance to designate NSAs:

> A /low income/ majority in a census tract is hard to find--it is very difficult to identify a few areas in which to concentrate funding. It is city policy to spread the money over the whole city to benefit all. Until now the /HUD/ area office went

> along, but now the city has had to designate eight NSAs and yet only 18 percent of the poor people live in them. . . Ten years ago it was federal policy to disperse low income people, so we did that. Now we may have 40 percent in an area, but it is not eligible as an NSA.
>
> Our application is basically for one big NSA, which includes most or all of the CDBG eligible areas. They made a few gaps, but it is really just one big NSA. NSAs are a ridiculous requirement.

Similarly for many cities the breakdown between the three major components of CD spending--infrastructure improvements, rehabilitation financing, and social services--represented either a continuation of what the city was already doing or a reflection of the initial fact that money could be drawn down faster for already planned infrastructure investment than for housing. As funds have been shifted to other uses, the change has been incremental and seldom subjected to strategic decision-making concerning the overall thrust of the program.

Stage

HUD guidelines concerning community participation emphasize the importance of including citizens at all stages of the decisional process. These stages are enumerated as:

> (1) developing the citizen participation plan, (2) developing the application, (3) program implementation, and (4) assessment of performance. (USDHUD, 1978b:21.)

Our analysis breaks down the process somewhat differently into the following divisions: (1) agenda setting; (2) initiation of project proposals; (3) allocative decisions; (4) implementation; (5) evaluation. In the majority of the study cities,

sustained community participation through these five stages was not achieved. Memphis and Denver were exceptions in reserving some funds to be controlled by neighborhoods throughout the process, but the amounts so allocated are small.

In all the cities, agenda setting was dominated by CD staff. As interpreters of the federal mandate and possessors of information on previous programs, staff tended to define the possibilities under CDBG, and community groups rarely challenged this prerogative. The recent effort by neighborhood groups in a number of cities to frame a neighborhood platform in conjunction with the National Association of Neighborhoods (NAN) national platform represents an attempt to break out of this pattern. In San Francisco a group representing primarily tenant interests has sought to use the ballot to bring issues of displacement into the public arena. While the CCCD has similar concerns over residential displacement, it had been unable to shape programs which address the problem. In Pittsburgh community groups complain that they were excluded from the formulation of the citizen participation plan and asked to consider options only at a later stage and according to a format devised wholly by the planning department staff (CDBG Subcommittee, 1980: 20).

The citizen input most encouraged, especially in the cities relying exclusively on public hearings for participation, is project initiation. The resulting "wish lists" mean that virtually

any project which is subsequently supported can be attributed to citizen requests. In the cities with advisory boards, there is also participation in allocative decisions, but the boards inevitably rely heavily on city staff for guidelines in terms of project eligibility and feasibility. Requests exceed available funding by ratios of two or three to one; in San Francisco, for example, in 1979 the city received 118 proposals for $60 million with many projects proposed by organizations about which board members had no first-hand knowledge. There is rarely a way to determine potential program effectiveness in advance of funding. Proposals are numerous and must all be reviewed in a brief period of time. Even with the use of task forces and subcommittees, citizen bodies are limited in their ability to arrive at independent judgments concerning the usefulness of a proposal.

Community group involvement in implementation of programs using CDBG funds tends to be minimal. Most projects funded by CDBG are carried out by city agencies, which use their regular personnel regardless of funding source. CDBG has not spawned the kinds of paraprofessional staffs that grew under War on Poverty programs and Model Cities. Rarely if ever is there routine citizen participation in departmental operations. In those cities like Memphis or San Francisco where city departments are responsible to independent boards or commissions, the citizen members of these bodies are generally downtown businessmen or civic notables; neighborhood leaders are not usually appointed to these positions. Several cities do contract to

neighborhood groups for some, mainly social service projects, although these constitute only a small proportion of the total CDBG program. Often, as in San Francisco, these groups were formerly Model Cities agencies. In Corpus Christi a community group has received a contract for the training of minority contractors to work on federally funded construction projects; the same group is planning to use CDBG funds to assist minority commercial development in the central business district. Housing corporations, which plan to sponsor low-income housing under federal and state programs, are relatively recent bidders for CDBG support in Pittsburgh and San Francisco. The Saint Paul Tenants Union receives $29,000 per year to support staff salaries.

On the whole community groups lack the tools for program evaluation. The federal Community Services Administration (CSA) grant of citizen monitoring projects may eventually aid in remedying this situation. Denver provides considerable technical assistance to neighborhood groups; in Saint Paul the Ad Hoc Citizens Evaluation Committee works with city planning department staff to perform an annual program evaluation. In most cities, however, community leaders must rely on the city's CD office or the agency being evaluated in order to gain information on performance. Often performance indicators are presented in forms which make them very difficult to assess, particularly in terms of the program's impact on low and moderate income groups. Birmingham is currently developing an improved evaluation procedure, although so far advisory board

members complain that progress is measured only in terms of dollars spent rather than results obtained. For the first time in 1979 the San Francisco CCCD was evaluating social service projects on a one-by-one basis.

We have divided our examination of the scope of citizen participation in community development into three categories: authority, span, and stage. We have found that the study cities are not uniform in terms of the role of community groups within these three different means of measurement. Some cities invite citizen comment on all aspects of community development (broad span) but give community groups little authority. There is an increasing tendency to involve citizens at more stages of the decisional process, especially as CDBG has now been in place long enough to have completed projects to its credit. Effective community participation implies both involvement in strategic decisionmaking and ability to call public officials to account. We have concluded that community groups have some authority but are inhibited from strategic decisionmaking by segmentation, and have difficulty in commanding accountability because of exclusion from the implementation and evaluation stages of decisionmaking.

We have, however, also found that some cities do include community input as an important component of the decisional process; and we have observed some broadening of span as well

as increased participation in more stages in almost all the study cities. Authority even where it exists is never assured; it remains problematical everywhere, dependent as it is on the attitudes of the selected officials in power.

CONCLUSIONS

In our discussion of the dimensions of citizen participation under the CDBG program, we have endeavored to trace the relationship between the legislative framework and the mode, representation field, and scope of participation. Our generalizations are limited, both because of the short period of observation and the changing character of CDBG since its inception. Varying local pressures, changes in emphasis from the Republican administration that began the program to the Democratic one that has been continuing it, and changes in the regulations deriving from program experience mean that the nature of participation has also changed. The time lag between changes in program parameters and responses to them by the communities further complicates the discussion. Moreover, it is only in the most recent period that the "hold harmless" provisions have lapsed, and cities have completed the projects to which they had committed funds under previous programs. Thus, is some cities (e.g. San Francisco) only now have cities obtained the funding flexibility intended by the block grant method of assistance. This greater flexibility means that in some cities the scope of citizen participation will increase. Conversely, in other cities, (e.g. Corpus Christi) where there

was only limited reliance on previous federal programs, the uses of CDBG were set early, and it is possible that the potential scope of citizen participation has narrowed.

Our findings then are constrained by the different meaning of the program within each city. We therefore present our analysis with the caveat that it represents an attempt to sort out a large number of influences, both historic and contemporary, on the operations of CDBG. While they are based on the systematic collection of data, conclusions from this data rely considerably on the interpretations of the researchers.

We find that much community participation moves through the traditional modes of interest group pluralism and the lobbying of city officials. CDBG is thus comparable to any other capital expenditure program in the type of politics it creates. Within the framework of pressure and bargaining which is implied by normal urban political decisionmaking, initial resources of participants count a great deal. As a result, overall capital expenditures of the cities, as opposed to those which are specifically funded by CDBG, reflect the traditional redevelopment constituency of business, especially tourist industry, interests. This is particularly true of major capital construction projects funded by EDA, UDAG, and municipal bonds, which have important spillover effects but over which community groups have little say. The part of the capital budget which is attributable directly to CDBG is more responsive to community group input, but not necessarily through the formal citizen

participation as opposed to the informal lobbying process. Some neighborhoods, frequently those which once had a Model Cities program, stand out as able to influence the resource allocation process.

CDBG tends to be a Mayor's program in cities where there is already a strong mayor. In others, like San Francisco where the Mayor must develop her power base against a number of competing bidders, it has proved to be an important mayoral resource. In Corpus Christi, where the city manager is the center of administrative power, the program is particularly responsive to his directives. In New Haven, which resembles San Francisco in the fluidity of its politics, the Board of Aldermen has recently increased its role. In Denver some community groups play a central role in CDBG policymaking; their influence, however, is at the pleasure of the Mayor and with the active support of some city council members.

Our findings correspond with the Brookings study (Dommel et al, 1980:3-6) which states: "Not surprisingly executive actors were clearly dominant in all four years, though with declining frequency." Brookings found that citizen groups were the leading actor in two of their sixty sample jurisdictions (3 percent) and shared the role of principal actor in five more (8 percent). We did not find citizen domination anywhere; whether citizens in Denver, Saint Paul, or San Francisco should be classified as sharing the role of principal actor with the executive depends on the viewpoint of the observer. Brookings'

ratings were based on the assessments of their field associates, who were asked to estimate "the relative influence of each type of actor over the program content of CDBG in their jurisdictions. . . ." (Dommel et al, 1980:3-4). Such a judgment is necessarily subjective; when based on the opinion of only one observer it must be interpreted with caution. Nevertheless, using different sample jurisdictions and uncalibrated measurements of influence, we come to conclusions compatible with the Brookings findings.

The important decisions concerning CDBG are made centrally. Despite the rhetorical stress on neighborhood which surrounds CDBG, it is a neighborhood program only in the sense that most expenditures attributed to it go to residential areas. Even since the March 1978 regulation calling for the designation of neighborhood strategy areas, the neighborhood focus is reduced from the preceding programs of Urban Renewal, Community Action, and Model Cities, all of which concentrated exclusively on a few, or only one, target area in each city. By the time a CDBG funding allocation reaches a neighborhood, the influence of neighborhood groups on its use is marginal since its purpose is already designated. For neighborhood residents to affect the program, they must intervene in the decisional process at an earlier point. The very strong district system in Saint Paul is a partial exception to this generalization.

While the switch from categorical to block grant embodied

in CDBG has increased the flexibility of the city government in addressing development issues, it has in various ways limited the leeway of community groups. First, community groups cannot use the power of the federal government as a resource when pressing demands against the city. Second, while the program provides funds for activities to which city planning departments accord first priority (infrastructure in particular), it constrains severely the amount of attention that can be given to certain functions with high priority to low income citizens. The restriction, which in some cities is interpreted by the CD office as an interdiction, on social service spending means that job-creating and service-receiving opportunities for low income people are limited. While CDBG does finance construction jobs, these are usually of less interest to neighborhood people than the paraprofessional positions of Community Action, Model Cities, and in some places the Comprehensive Employment and Training Act (CETA).

Third, for those low and moderate income individuals who are renters, active involvement in the CDBG policymaking process offers few prospective rewards because of limitations on eligible activities. While the data collection on which this report is based does not permit us to break down active participants by owner/renter status, observation and interview data support this point.[4] Neighborhood leaders have repeatedly reported frustration in their efforts to involve renters:

> District councils represent, to the extent they represent anybody, homeowners. Tenants don't identify with neighborhoods. . . We don't know what to

> do to improve citizen participation /by tenants/. The city's community organizers don't talk to tenants.

The citizen participation liaison person employed by another city, discussing her efforts to obtain participation in a street landscaping program, commented:

> Each block is about 50 percent renter, and renters and landlords don't want to participate. Renters fear that landlords might raise rents, and landlords don't see the benefit to them in getting involved.

Lack of benefits to renters formed a principal basis for an administrative complaint signed by 25 members of the official citizens advisory board in Birmingham:

> The City's objectives and strategy, aimed at stabilizing the city and therefore stressing homwownership and production of single family housing, do not appropriately address the needs of lower income families who need rental assistance.
>
> These same objectives and strategy, in determining the selection of NSA's, have caused black neighborhoods with significant populations of very low income families who are not homeowners and with major concentrations of substandard housing, to be systematically excluded from NSA designation. (Tainsh, 1979.)

Low renter participation and insufficient program benefits to renters cannot, however, be attributed solely to local program operations. For renters the housing problem is felt most intensely as the lack of low-cost housing (Sternlieb and Hughes, 1979: 254-5); the emphasis of CDBG programs on improving housing and neighborhood quality implies for them a trade-off between improved living conditions and low rents. A city staff person expressed her frustration at using CDBG

in order to improve the situation of low income renters:

> Census Tract #16 is 75-100 percent tenant occupied. Most of these low income people can't afford to own homes. So, doing slums and blight, you're helping owners, not poor people. HUD is wrong. If you solve slums and blight, the poor can't afford to live there.

The primary objective of low-income renters in relationship to capital development programs is the construction or substantial rehabilitation of low-cost rental units. The former, however, is prohibited as a use of CDBG funds under the Act. Local option thus is narrowed to two policy choices: use of rehabilitation funds on rental buildings and assistance to not-for-profit low-income housing sponsors, who would then raise construction funds through regular financial institutions. Rehabilitation assistance to private landlords presents difficulties for a variety of reasons including landlord reluctance to incur governmental regulation and the city's fear of "subsidizing slumlords." Neighborhood groups are only just beginning to bid for CDBG funds to support their efforts as non-profit sponsors. While it is possible that in the future more CDBG funds will be used for this purpose, current high interest rates make it a difficult strategy. So far, of the nine cities in our sample, only San Francisco, in the most recent program year, has committed substantial CDBG support for community housing organizations with renter constituencies.

For the most part, therefore, participation in the CDBG allocation and implementation process does not constitute an effective means by which tenants can counter the upward pressure

on rents that may result from neighborhood revitalization. Tenant movements usually focus on rent control, as in the 1979 San Francisco referendum aimed at preventing speculation and rent increases. While many analysts argue that limiting rents further discourages supply (Sternlieb and Hughes, 1979: 254), the limited availability of subsidies tends to preclude other strategies. The problem is further exacerbated within homogeneously black neighborhoods, where HUD currently restricts any new subsidized construction because of racial impact. Thus, in New Haven where both the city and community residents desire construction of housing in areas where demolition had taken place under the former Urban Renewal program, federal restrictions prevent activity.

Effective community group participation depends on active local leadership, coalition building, and the ability to gain technical assistance. Differences among neighborhoods in terms of their ability to gain a hearing can be traced almost entirely to the effectiveness of their representatives. Only through coalitions are community groups able to influence overall priorities of the CDBG program. The capital intensive nature of the program, and the domination of the agenda setting phase of the decisional process by professional staff, mean that community groups are at a serious disadvantage, especially in terms of program evaluation, if they do not have access to technical assistance. HUD has refused to deal directly with community groups and thus does not constitute a source of such

assistance. Community groups have looked to private foundations, other federal agencies, federally sponsored groups like Neighborhood Legal Services, VISTA, and the Center for Community Change for aid. They also receive assistance from the city itself, but it is rare that city-funded planners will oppose the administration.

Unless city hall genuinely wishes to encourage citizen participation, the CDBG program will not precipitate it. This is true both because CDBG does not provoke the extreme opposition of urban renewal and urban highways, nor does it provide substantial support for citizen participation as did the Community Action Program and Model Cities. In some cities the Mayor considers community groups to be a useful element in the governing coalition; in others he or she regards them as a threat. It is our perception that the reference groups of planning offices have changed from the period when Robert Dahl (1961:139) wrote:

> With reference to the physical pattern of the city, the redevelopment leaders were radical; with respect to the socioeconomic structure they were - by comparison with proponents of the New Deal, for example - conservative.

Planning staff have become more sensitive to the need for neighborhood preservation and the impact of community development programs on low income groups. Nevertheless, cities continue to invest heavily, especially using their own bonding powers, in economic development, rather than neighborhood improvement programs. The inadequacy of funds to assist low

income people is everywhere lamented by planners we interview, but this is not reflected in a diversion of funds away from major capital improvements into investment in low income housing. Planners themselves continue to lack sufficient political clout to translate their desires for neighborhood development into public programs. The deference paid in words to the needs of low income groups has not been translated into funding comparable to that given to waterfront development, commercial revitalization, etc.

Cities have tended to rely on different sources of funding for economic investment and neighborhood improvement. Thus, these objectives have mainly not clashed in the CDBG decisional process. In San Francisco, however, where CDBG funds are used to pay staff in both the Redevelopment and Economic Development Agencies, the struggle between conflicting investment aims is openly expressed. At a meeting between the Mayor and the Citizens Committee, the Mayor asserted in response to CCCD opposition to continued funding of the Economic Development Agency (EDA):

> I don't know what the problem is between your group and EDA. . . You two need to improve your communication. UDAG /for which EDA was writing the proposal/ is our big hope. If we can get industrial parks and industry to come in, then we get the key jobs we're looking for. The two most critical areas as I see it are jobs and economic development first, and housing second. We must deal with the priorities in that order. (Meeting of July 16, 1979)

The outcomes of CDBG tend, within the constraints of the program guidelines, to reflect the balance of power within each

city. The principal beneficiary requirement undoubtedly causes more program money to flow to low and moderate income groups than would otherwise be the case (Dommel et al, 1980: chap. 7). But CDBG has relatively little independent effect in determining the politics of development in each city. The restrictions on the use of its funding, while presenting cities from using it principally to foster downtown development, also limit the capabilities of community groups by constraining the objectives they can seek and by having extremely minimal requirements for community input.

NOTES

[1]Citizen participation is an especially value laden and controversial subject within contemporary urban analysis. We adhere to the position taken by Nicos Mouzelis in summarizing various theories of organization:

> A point which seems to gain the consensus of most social scientists is that the attempt to disguise one's values under a pseudo-scientific cloak is misleading and useless. Although value judgments are evidently related to facts, and although they can be studied from the outside as facts, they cannot be reduced to factual propositions (in the sense that they are not as the latter amenable to objective validation or rejection by experiment). From this point of view the attempt of some managerial theorists. . . to disguise their value judgments under the cover of scientific objectivity, their claim to provide scientific solutions to power conflicts arising from antagonistic interests is . . . naive.
>
> On the other hand, it becomes increasingly clear that one is not obliged to disguise one's values and preferences or to make them somehow disappear from one's research in order to be objective. In spite of the fact that values inevitably play a role in the determination of the problems to be examined and even of the conceptual tools which are used, they do not necessarily distort social research. (Mouzelis, 1967: 170).

[2]HUD's third annual report on CDBG found that "three-fourths of the cities have created citizen advisory committees, usually appointed (61 percent) and city-wide in coverage (70 percent)" (USDHUD, 1978c:377).

[3]The classic statement of bureaucratic domination within democratically governed states was made by Max Weber:

> Under normal conditions, the power position of a fully developed bureaucracy is always overtowering. The 'political master' finds himself in the position of the 'dilettante' who stands opposite the 'expert,' facing the trained official who stands within the management of administration. This holds whether the 'master' whom the bureaucracy serves is a 'people,' equipped with the weapons of 'legislative initiative,' the 'referendum,' and the right to remove officials, or a parliament, elected on a more aristocratic or more

> 'democratic' basis and equipped with the right to vote a lack of confidence, or with the actual authority to vote it. It holds whether the master is an aristocratic, collegiate body, legally or actually based on self-recruitment, or whether he is a popularly elected president, a hereditary and 'absolute' or a 'constitutional' monarch. (Gerth and Mills, 1946: 232-3.)

Subsequent scholars have qualified the absoluteness of Weber's generalizations, but in the words of the author of a major contemporary text on bureaucratic theory, "this empirical re-examination does not modify radically the insights of the earlier writers" (Mouzelis, 1967:62). A recent discussion of the accountability of American urban bureaucracies contends:

> the central features of bureaucracy militate very strongly against maintaining accountability in the administrative state. Administrators, agencies, and programs are heavily insulated from control by elected and politically appointed officials. In the United States this normal condition. . . is further compounded by the constitutional status of public employees. . . . (Rosenbloom, 1978: 96.)

The argument which underlies virtually all examinations of the relationship between bureaucracy and political democracy is that the structural position of bureaucrats, rather than their individual desires for power, creates bureaucratic autonomy. In particular, expertise, control over information ("the files"), and civil service tenure comprise the basis for the authoritative role of professional administrators.

[4]The telephone survey of citizen participants that we plan to administer during the summer of 1980 will identify renter/owner status of activists.

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The initial HUD "Statement of Work" (December 1977) envisioned field work in thirty cities. Due to budget constraints on data collection and an appreciation for the complexity of the requisite analysis, the final selection process resulted in a substantial reduction in the number of study areas. Indeed, with the total household survey limited to approximately 4,000 completed interviews, it was determined that the most cost effective city sample size would be about ten. The rationale for this decision is described below.

A critical requirement for the research design is that the sample cities represent a wide diversity of CDBG program mixes. This is necessary for our ability to understand how and why specific types of effects occur or fail to occur as a result of the implementation of varying combinations of CD activities. It is also important since CD programs are not fixed: they vary not only from place to place, but over time--in one place or year emphasizing public infrastructure, in another housing rehabilitation. Thus, the question of CDBG impact, of who benefits and how, is properly asked as, how do benefits vary from different types of CDBG activities and how do varying circumstances, e.g., household and neighborhood characteristics, affect the outcomes of particular activities.

The first stage of the city selection process was aimed at identifying an initial sample of 60 cities from the list of 410 entitlement cities in the continental United States with populations over 50,000 (in 1970). This initial sample was not selected at random but according to criteria designed to maximize the sample's diversity with respect to: (a) sociodemographic and program background characteristics; (b) region of the country; and (c) population size. At this stage adequate data

were not available on the CDBG programs in the cities. It was assumed, however, that a sample of sufficient diversity on the other characteristics would yield a sample diverse in its programs.

A purely random selection of only ten cities would not have ensured that different types of cities with respect to socio-economic and demographic conditions, population size and region of the country would be adequately represented. These selection criteria were incorporated within a cluster analysis of all 410 entitlement cities. The analysis yielded grouping of cities with respect to their socio-demographic characteristics and within the regional and size categories. Sixty cities were selected from these clusters so as to minimize redundancy within the sample. That city was selected within each cluster whose scores most closely approximated the cluster means.*

The second stage in selection occurred in the reduction of candidate cities from 60 to 10. The list was first reduced from 60 to 27 by eliminating the 33 cities with population between 50,000-100,000 in 1970. For the most part these cities had very much smaller CDBG allocations, which were generally spent largely on a single activity, e.g., sewer construction. Thus, they represented a quite different universe than the larger cities, which may differ in program emphasis, but generally span the range of expenditures.

The following 27 cities, (of population size over 100,000 in 1970) were designated for field reconnaissance by Abt Associates, to determine the details of their CDBG programs, the quality of their records, and

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*The cluster analysis is described by Julian Wolpert, "Selection of Sample Cities for CDBG Evaluation," (August 14, 1978).

a number of other items necessary to the study and subsequent data collection.

Atlanta, Ga.	Lincoln, Neb.
Birmingham, Ala.	Memphis, Tenn.
Boston, Mass.	Minneapolis, Minn.
Bridgeport, Conn.	New Haven, Conn.
Cleveland, O.	New Orleans, La.
Chicago, Ill.	Oakland, Ca.
Corpus Christi, Tex.	Pittsburgh, Pa.
Denver, Colo.	Rochester, N.Y.
Des Moines, Iowa	St. Paul, Minn.
Detroit, Mich.	San Francisco, Ca.
Erie, Pa.	San Jose, Ca.
Gary, Ind.	Springfield, Mass.
Lansing, Mich.	Tacoma, Washington
	Wichita, Kan.

Based upon these Abt field reports, 15 of these cities were also visited by a group representing the University of Pennsylvania research team, HUD, Abt Associates and the National Opinion Research Center.*

Following these visits, each city was re-examined with respect to the original cluster analysis that had identified the set of 60 cities. Nine cities were selected to provide balance of regional and size diversity, to maintain representativeness of the city to its cluster of places, and to ensure CDBG program diversity. The final list of 9 cities** contains five in size category 100,000 to 500,000 and 4 in the over 500,000 category (Table 1). Two are in the northeast, two in the

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*A few cities were eliminated from consideration for a variety of reasons. A detailed accounting is provided in Addendum to "Selection of Sample Cities for CDBG Evaluation," (memorandum from Janet Rothenberg Pack to Raymond Struyk, April 3, 1979).

**The City of Chicago was among those initially selected but ultimately dropped from the sample for a number of reasons, one of the more important being the delay in acceptance of the study by the city due to the Mayoral election, with the result that the field work would have been completely unsynchronized with that in the other nine cities.

north central region, three in the south and two in the west. Each of the selected cities has been drawn from a cluster that isplaces similar with respect to socio-demographic characteristics and prior program experience.

As indicated above, a critical characteristic of the sample cities for the research design is that they represent a wide diversity of CDBG program mixes. Summary Table 2 compares some of the major (qualitative) features of the group of 27 and illustrates our success in selecting a sample which embodies substantial program variety. These summaries are derived from the interviews carried out by Abt Associates with city officials and other persons acquainted with the CDBG program in each of the cities.*

*These comparisons are taken from the memorandum from Janet Rothenberg Pack to Raymond Struyk cited above. Additional comparisons were made of draw-down rates and budget allocations. The qualitative appraisals shown here cannot be directly compared with the budget data. In many ways they are more useful, however, since draw-down rates can vary very substantially and budgeted and realized expenditures may be quite different. These qualitative data generally reflect several years of realized expenditure patterns. Performance reports, which should reflect actual expenditures, were also examined. They are, however, generally difficult to compare across cities and are not considered very reliable.

TABLE 2

SUMMARY OF CDBG PROGRAM CHARACTERISTICS

	9 Sample Cities	27 City Group
Housing rehab.	7 high 1 moderate 1 no information	15 high 2 moderate 7 low 1 none 2 no information
Residential redevelopment	6 yes 3 no	17 yes 8 no 1 planned 1 no information
Relocation	7 none or minimal 1 extensive 1 80 households	20 none or minimal 1 moderate 3 extensive 3 80, 125, 189 households
Public works	9 yes	26 yes 1 no
Public facilities	9 yes	26 yes 1 no
Geographic characteristics	3 dispersed 5 targeted 1 mixed	10 dispersed 13 targeted 4 mixed
Citizen participation	5 active 3 moderate 1 no information	14 active 9 moderate 3 low 1 no information

Source: Field interviews by Abt Associates, Fall 1978.

APPENDIX B

INTERVIEWS BY CITY AND TYPE OF RESPONDENT

City	Political leaders[a]	Administrators[b]	Advisory Bd. members[c]	Organization leaders[d]	Other informants[e]	Total
Birmingham	9	10	19	10	-	48
Corpus Christi	7	3	--	10	6	26
Denver	3	14	7	12	4	40
Memphis	1	6	6	5	3	21
New Haven	12	10	--	24	4	50
Pittsburgh	3	9	--	15	9	36
Saint Paul	14	17	6	10	6	53
San Francisco	9	21	16	32	12	90
Wichita	5	18	10	10	1	44
Total	63	108	64	128	45	408

[a]Includes elected officials, political party leaders, aspirants to elected office, leaders of broad-based political movements

[b]Includes federal, state, and local, both political and civil service appointees

[c]Includes only members of official CDBG citizens advisory bodies

[d]Includes leaders of both neighborhood and citywide organizations

[e]Includes those not otherwise categorized (e.g. members of city planning commissions, staff of downtown development organizations, university professors)